Housing Element Sites Rezone Project

SCH# 2023100581

Final Environmental Impact Report

Prepared for

Placer County

April 2024

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years

1501 Sports Drive, Suite A, Sacramento, CA 95834

Housing Element Sites Rezone Project
Final Environmental Impact Report

SCH# 2023100581

Lead Agency

County of Placer
Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

Shirlee Herrington
Environmental Coordination Services
(530) 745-3132

Prepared By

Raney Planning and Management, Inc.
1501 Sports Drive, Suite A
Sacramento, CA 95834
(916) 372-6100

Contact:
Nick Pappani
Vice President

Table of Contents

TABLE OF CONTENTS

CHAPTER **PAGE**

1. Introduction and List of Commenters 1-1

1.1 Introduction 1-1
1.2 Background 1-1
1.3 Purpose of the Final EIR 1-2
1.4 List of Commenters 1-3
1.5 Organization of the Final EIR 1-13

2. Responses to Comments 2-1

2.1 Introduction 2-1
2.2 Master Responses 2-1
2.3 Responses to Comments 2-10

3. Revisions to the Draft EIR Text 3-1

3.1 Introduction 3-1
3.2 Description of Changes 3-1

4. Mitigation Monitoring and Reporting Program 4-1

4.1 Introduction 4-1
4.2 Compliance Checklist 4-1
4.3 Mitigation Monitoring and Reporting Program 4-2

1. Introduction and List of Commenters

1. INTRODUCTION AND LIST OF COMMENTERS

1.1 INTRODUCTION

This Final Environmental Impact Report (EIR) contains agency and public comments received during the public review period of the Housing Element Sites Rezone Project (proposed project) Draft EIR. This document has been prepared by Placer County, as Lead Agency, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, Section 15132. The Introduction and List of Commenters chapter of the Final EIR discusses the background of the Draft EIR and purpose of the Final EIR, identifies the comment letters received on the Draft EIR, and provides an overview of the Final EIR's organization.

1.2 BACKGROUND

The Draft EIR identifies the proposed project's potential environmental impacts and the mitigation measures that would be required to be implemented. The following environmental analysis chapters are contained in the Draft EIR:

- Air Quality and Greenhouse Gas (GHG) Emissions;
- Biological Resources;
- Cultural Resources;
- Noise;
- Transportation;
- Tribal Cultural Resources;
- Fire Protection and Wildfire;
- Statutorily Required Sections; and
- Alternatives Analysis.

The remaining environmental issue areas identified by Appendix G of the CEQA Guidelines are addressed in the Initial Study prepared for the proposed project, which is included as Appendix A of the Housing Element Sites Rezone Project Draft EIR.

In accordance with CEQA, the Draft EIR was sent to the State Clearinghouse (SCH#: 2022010188) for distribution to State agencies on February 2, 2024, for a 45-day public review period. In addition, the Draft EIR and a Notice of Availability (NOA) for the Draft EIR were published on the Placer County Community Development Resource Agency website. Printed copies of the Draft EIR were made available for review at the following locations:

- Colfax Public Library (10 W Church Street);
- Foresthill Public Library (24580 Main Street);
- Granite Bay Public Library (6475 Douglas Boulevard);
- Kings Beach Public Library (301 Secline Street);
- Lincoln Public Library (485 Twelve Bridges Drive);
- Loomis Public Library and Community Learning Center (6050 Library Drive);
- Rocklin Public Library (4890 Granite Drive);

- Roseville Public Library (225 Taylor Street);
- Tahoe City Public Library (740 N Lake Boulevard);
- Truckee Public Library (10031 Levon Avenue);
- Placer County Community Development Resource Agency office in Auburn (3091 County Center Drive);
- Placer County Community Development Resource Agency office in Tahoe City (775 N Lake Boulevard); and
- County Clerk's Office (2954 Richardson Drive).

A public hearing was held on February 22, 2024, to solicit public comments regarding the Draft EIR.

1.3 PURPOSE OF THE FINAL EIR

Under CEQA Guidelines Section 15132, the Final EIR shall consist of:

1. The Draft EIR or a revision of the Draft.
2. Comments and recommendations received on the Draft EIR.
3. A list of persons, organizations, and public agencies commenting on the Draft EIR.
4. The responses to significant environmental points raised in the review process.
5. Any other information added by the Lead Agency.

As required by CEQA Guidelines, Section 15090(a)(1)-(3), a Lead Agency must make the following three determinations in certifying a Final EIR:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the Lead Agency's independent judgment and analysis.

Under CEQA Guidelines Section 15091, a public agency shall not approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects. Findings of Fact must be accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The Findings of Fact are included in a separate document that will be considered for adoption by the County's decision-makers.

Pursuant to CEQA Guidelines, Section 15093(b), when a Lead Agency approves a project that would result in significant and unavoidable impacts, the agency must state in writing the reasons supporting the action (Statement of Overriding Considerations). The Statement of Overriding Considerations shall be supported by substantial evidence, and are subject to adoption by the County's decision-makers along with the Findings of Fact. The Housing Element Sites Rezone Project would result in a significant and unavoidable impact related to the following:

- Conflict with or obstruct implementation of the applicable air quality plan during project operation (Impact 4-2);
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality

standard (including releasing emissions which exceed quantitative thresholds for ozone precursors) (Impact 4-4);
- Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs (Impact 4-5);
- Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5 (Impact 6-1);
- Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (Impact 7-1); and
- Result in VMT which exceeds an applicable threshold of significance, except as provided in CEQA Guidelines Section 15064.3, subdivision (b) (Impact 8-5).

Thus, a Statement of Overriding Considerations must be adopted if the project is approved.

1.4 LIST OF COMMENTERS

Placer County received seven comment letters from agencies, 14 letters from groups, and 473 individual comment letters during the public comment period on the Draft EIR for the proposed project. In addition, verbal comments were received at the Public Hearing. This Final EIR includes all comment letters received, including duplicate letters authored by the same individual(s), but sent to multiple recipients. Some agencies, groups, and/or individuals submitted multiple letters, and, as a result, their name appears multiple times in the lists below. The comment letters were authored by the following agencies, groups, and individuals:

Agencies

Letter 1 ..... Placer County Airport Land Use Commission
Letter 2 ..... City of Auburn (Letter 1 of 2, 03/18/24)
Letter 3 ..... City of Auburn (Letter 2 of 2, 03/18/24)
Letter 4 ..... Dry Creek Joint Elementary School District
Letter 5 ..... Placer County Transportation Planning Agency
Letter 6 ..... Placer Hills Fire Protection District
Letter 7 ..... South Placer Municipal Utility District

Groups

Letter 8 ..... Defend Granite Bay (Letter 1 of 4, 02/20/24)
Letter 9 ..... Defend Granite Bay (Letter 2 of 4, 02/21/24)
Letter 10 ..... Defend Granite Bay (Letter 3 of 4, 03/07/24)
Letter 11 ..... Defend Granite Bay (Letter 4 of 4, 03/18/24)
Letter 12 ..... Dry Creek Residents (Letter 1 of 2, 02/27/24)
Letter 13 ..... Dry Creek Residents (Letter 2 of 2, 02/27/24)
Letter 14 ..... Mountain Air Preservation (Letter 1 of 2, 03/07/24)
Letter 15 ..... Mountain Air Preservation (Letter 2 of 2, 03/18/24)
Letter 16 ..... Plan Steward
Letter 17 ..... Munir Management Corporation
Letter 18 ..... PC Residents
Letter 19 ..... Penryn Chit-Chat
Letter 20 ..... Public Interest Coalition
Letter 21 ..... TCS Planning

Individuals

Letter 22 ..... Sofyan Abbasi
Letter 23 ..... Steve Abella
Letter 24 ..... Saeed Ahmed
Letter 25 ..... Scott Alexander
Letter 26 ..... Taylor Alexander
Letter 27 ..... John Anderson
Letter 28 ..... Kelly Anderson
Letter 29 ..... Lois Anderson
Letter 30 ..... Cristen Andrews
Letter 31 ..... Carol Apple
Letter 32 ..... Dennis Arietta
Letter 33 ..... Anita Arietta
Letter 34 ..... Lottie Ashton and Jason Long
Letter 35 ..... Jane Bailey
Letter 36 ..... Judie Barlupi
Letter 37 ..... Rhiannon Beck (Letter 1 of 2, 03/07/24)
Letter 38 ..... Rhiannon Beck (Letter 2 of 2, 02/12/24)
Letter 39 ..... Amber Beckler (Letter 1 of 4, 02/21/24)
Letter 40 ..... Amber Beckler (Letter 2 of 4, 03/18/24)
Letter 41 ..... Amber Beckler (Letter 3 of 4, 02/16/24)
Letter 42 ..... Amber Beckler (Letter 4 of 4, 02/12/24)
Letter 43 ..... Jim Beckmeyer
Letter 44 ..... Courtney Berger
Letter 45 ..... Cheryl Berkema (Letter 1 of 6, 02/13/24)
Letter 46 ..... Cheryl Berkema (Letter 2 of 6, 02/27/24)
Letter 47 ..... Cheryl Berkema (Letter 3 of 6, 03/12/24)
Letter 48 ..... Cheryl Berkema (Letter 4 of 6, 03/11/24)
Letter 49 ..... Cheryl Berkema (Letter 5 of 6, 02/21/24)
Letter 50 ..... Cheryl Berkema (Letter 6 of 6, 02/13/24)
Letter 51 ..... Steven Berry
Letter 52 ..... Darlene Bettencourt (Letter 1 of 4, 03/11/24)
Letter 53 ..... Darlene Bettencourt (Letter 2 of 4, 03/07/24)
Letter 54 ..... Darlene Bettencourt (Letter 3 of 4, 03/11/24)
Letter 55 ..... Darlene Bettencourt (Letter 4 of 4, 03/06/24)
Letter 56 ..... Marie Blomgren
Letter 57 ..... Daniel Bojckov (Letter 1 of 2, 03/14/24)
Letter 58 ..... Daniel Bojckov (Letter 2 of 2, 02/23/24)
Letter 59 ..... Nicholas Boliard
Letter 60 ..... Walter Boswell
Letter 61 ..... Brad and Susan Bransen
Letter 62 ..... Babette Breisacher (Letter 1 of 2, 03/08/24)
Letter 63 ..... Babette Breisacher (Letter 2 of 2, 03/06/24)
Letter 64 ..... James Brennan
Letter 65 ..... Jennifer Brooks
Letter 66 ..... Douglas P. Brosnan
Letter 67 ..... George Brown
Letter 68 ..... Chris Brown
Letter 69 ..... Dee Browning (Letter 1 of 2, 03/08/24)
Letter 70 ..... Dee Browning (Letter 2 of 2, 02/16/24)

Letter 71 ..... Shannon Browning (Letter 1 of 2, 02/08/24)
Letter 72 ..... Shannon Browning (Letter 2 of 2, 02/15/24)
Letter 73 ..... Bernice Bryant
Letter 74 ..... Joseph Buckwalter
Letter 75 ..... Laura Bullard (Letter 1 of 4, 03/08/24)
Letter 76 ..... Laura Bullard (Letter 2 of 4, 03/18/24)
Letter 77 ..... Laura Bullard (Letter 3 of 4, 03/08/24)
Letter 78 ..... Laura Bullard (Letter 4 of 4, 02/12/24)
Letter 79 ..... Rachel Buller
Letter 80 ..... Karen and Garland Burrell
Letter 81 ..... Julie Burkett
Letter 82 ..... Janice Burnham
Letter 83 ..... Jan Burnham
Letter 84 ..... Richard Burtzlaff (Letter 1 of 4,03/08/24)
Letter 85 ..... Richard Burtzlaff (Letter 2 of 4, date unknown)
Letter 86 ..... Richard Burtzlaff (Letter 3 of 4, 02/18/24)
Letter 87 ..... Richard Burtzlaff (Letter 4 of 4, date unknown)
Letter 88 ..... Terri Burtzlaff (Letter 1 of 2, 03/17/24)
Letter 89 ..... Terri Burtzlaff (Letter 2 of 2, 03/08/24)
Letter 90 ..... Myron Butler
Letter 91 ..... Duane and Karen Calkins
Letter 92 ..... Jaynnie Caraway
Letter 93 ..... Jo Anne Carmona
Letter 94 ..... Katharine Carpenter
Letter 95 ..... Donna Carver (Letter 1 of 2, 02/10/24)
Letter 96 ..... Donna Carver (Letter 2 of 2, 02/09/24)
Letter 97 ..... Jessica Lang Casares
Letter 98 ..... Richie Chan (Letter 1 of 2, 03/14/24)
Letter 99 ..... Richie Chan (Letter 2 of 2, 03/06/24)
Letter 100 ..... Angela Chang
Letter 101 ..... Linda Christensen
Letter 102 ..... Jennifer Clarke-Pena (Letter 1 of 2, 03/14/24)
Letter 103 ..... Jennifer Clarke-Pena (Letter 2 of 2, 02/14/24)
Letter 104 ..... Cindy Cloud
Letter 105 ..... Eileen Cook
Letter 106 ..... Brittney Martines-Copeland
Letter 107 ..... C. Costa
Letter 108 ..... Kristin Cox (Letter 1 of 2, 03/08/24)
Letter 109 ..... Kristin Cox (Letter 2 of 2, 02/15/24)
Letter 110 ..... Kellie Criscione
Letter 111 ..... Kelly Cross (Letter 1 of 2, 03/14/24)
Letter 112 ..... Kelly Cross (Letter 2 of 2, 03/07/24)
Letter 113 ..... Gary Dahlbeck (Letter 1 of 2, 03/05/24)
Letter 114 ..... Gary Dahlbeck (Letter 2 of 2, 02/20/24)
Letter 115 ..... Dave W.
Letter 116 ..... David Horti (Letter 1 of 2, 03/16/24)
Letter 117 ..... David Horti (Letter 2 of 2, 02/21/24)
Letter 118 ..... Muriel Davis (Letter 1 of 5, 03/07/24)
Letter 119 ..... Muriel Davis (Letter 2 of 5, 03/08/24)
Letter 120 ..... Muriel Davis (Letter 3 of 5, 03/18/24)

Letter 121 ..... Muriel Davis (Letter 4 of 5, 03/07/24)
Letter 122 ..... Muriel Davis (Letter 5 of 5, 02/02/24)
Letter 123 ..... Eva Dayananthan
Letter 124 ..... Donna Delno (Letter 1 of 5, 02/22/24)
Letter 125 ..... Donna Delno (Letter 2 of 5, 03/06/24)
Letter 126 ..... Donna Delno (Letter 3 of 5, 03/07/24)
Letter 127 ..... Donna Delno (Letter 4 of 5, 02/27/24)
Letter 128 ..... Donna Delno (Letter 5 of 5, 02/22/24)
Letter 129 ..... Kadie DeMar
Letter 130 ..... James and Linda Dennis
Letter 131 ..... Elizabeth Donnelly (Letter 1 of 2, 03/01/24)
Letter 132 ..... Elizabeth Donnelly (Letter 2 of 2, 03/17/24)
Letter 133 ..... Kevin Donnelly
Letter 134 ..... Chris Driessen (Letter 1 of 2, 03/18/24)
Letter 135 ..... Chris Driessen (Letter 2 of 2, 03/11/24)
Letter 136 ..... Craig Dulis
Letter 137 ..... Dimple Dullabh
Letter 138 ..... Christi Earhart
Letter 139 ..... Christi and Brandon Earhart
Letter 140 ..... Kasie Eaton (Letter 1 of 2, 03/11/24)
Letter 141 ..... Kasie Eaton (Letter 2 of 2, 03/08/24)
Letter 142 ..... Sharon Elam
Letter 143 ..... Tanja S. Elbert
Letter 144 ..... Jack and Bonnie Ellering
Letter 145 ..... Carrie Ellinwood
Letter 146 ..... Judy Ellis
Letter 147 ..... Eddie Epperson
Letter 148 ..... Erik
Letter 149 ..... MacKenzie Evans
Letter 150 ..... Scott Faber
Letter 151 ..... Melissa Fannin
Letter 152 ..... Michael Farrauto
Letter 153 ..... Antoinette Fabela
Letter 154 ..... Kathrine Fegette
Letter 155 ..... Carolina Fenske Arnone
Letter 156 ..... Jon Fenske
Letter 157 ..... Janice Fera
Letter 158 ..... Leslie Ferrini
Letter 159 ..... Mike Fitzpatrick
Letter 160 ..... Francine Foerster
Letter 161 ..... Alicia Forsythe
Letter 162 ..... Jaclyn Freeman (Letter 1 of 5, 03/06/24)
Letter 163 ..... Jaclyn Freeman (Letter 2 of 5, 03/18/24)
Letter 164 ..... Jaclyn Freeman (Letter 3 of 5, 03/18/24)
Letter 165 ..... Jaclyn Freeman (Letter 4 of 5, 03/06/24)
Letter 166 ..... Erik Freeman
Letter 167 ..... Barbara Funez
Letter 168 ..... Todd Gaither
Letter 169 ..... Elizabeth Gaither
Letter 170 ..... Cindy Garbutt, Gene Garbutt, Jessie Garbutt, and Robert Garbutt

Letter 171 ..... Theodore Garelis
Letter 172 ..... Melissa George
Letter 173 ..... David and Afina Gibbs
Letter 174 ..... Andrea Glassberg (Letter 1 of 2, 03/17/24)
Letter 175 ..... Andrea Glassberg (Letter 2 of 2, 02/26/24)
Letter 176 ..... Laura Gleason
Letter 177 ..... Ryan Gleason
Letter 178 ..... Chris Gleason
Letter 179 ..... Julie Goodwin
Letter 180 ..... Aliona Gorceac
Letter 181 ..... Laura Gorceac
Letter 182 ..... Sandra Gordon
Letter 183 ..... Zack Gossell
Letter 184 ..... Shelley Gray (Letter 1 of 2, 02/09/24)
Letter 185 ..... Shelley Gray (Letter 2 of 2, 02/09/24)
Letter 186 ..... Christopher Hale
Letter 187 ..... Blair and Madeline Halliday
Letter 188 ..... Linda and Sajjad Hamid
Letter 189 ..... Jane Hamilton
Letter 190 ..... Steve Haney
Letter 191 ..... Greg Harper and Kyle Herbold
Letter 192 ..... J. Harriman
Letter 193 ..... Sandra Harris
Letter 194 ..... Michael Hartmann
Letter 195 ..... Doug Hawkins
Letter 196 ..... Ryan Haynes (Letter 1 of 2, 03/08/24)
Letter 197 ..... Ryan Haynes (Letter 2 of 2, 02/21/24)
Letter 198 ..... Sophia Heidrich
Letter 199 ..... Ann Henderickson
Letter 200 ..... Desiree Hennessy
Letter 201 ..... Donna L. Hogue
Letter 202 ..... Craig and Nita Hollyfield
Letter 203 ..... Dale and Jane Holmgren
Letter 204 ..... Valerie Houghton
Letter 205 ..... Daniel Howell (Letter 1 of 2, 03/15/24)
Letter 206 ..... Daniel Howell (Letter 2 of 2, 02/11/24)
Letter 207 ..... Patricia Hurley
Letter 208 ..... Sue Ingle
Letter 209 ..... Steve Irvine (Letter 1 of 3, 03/16/24)
Letter 210 ..... Steve Irvine (Letter 2 of 3, 03/16/24)
Letter 211 ..... Steve Irvine (Letter 3 of 3, 03/05/24)
Letter 212 ..... Bryan Jackson (Letter 1 of 2, 03/15/24)
Letter 213 ..... Bryan Jackson (Letter 2 of 2, 03/15/24)
Letter 214 ..... Dana Jacques
Letter 215 ..... Alice Jenkins (Letter 1 of 4, 03/06/24)
Letter 216 ..... Alice Jenkins (Letter 2 of 4, 03/06/24)
Letter 217 ..... Alice Jenkins (Letter 3 of 4, 03/06/24)
Letter 218 ..... Alice Jenkins (Letter 4 of 4, 02/26/24)
Letter 219 ..... Steve and Julie Jensen
Letter 220 ..... Jessica

Letter 221 ..... Kris Johnson
Letter 222 ..... Scott Johnson
Letter 223 ..... Allana Jones
Letter 224 ..... Trisha Jones
Letter 225 ..... Zenith Jones (Letter 1 of 2, 03/18/24)
Letter 226 ..... Zenith Jones (Letter 2 of 2, 02/02/24)
Letter 227 ..... Cathy Jordan
Letter 228 ..... Steve Kastan
Letter 229 ..... J. Keith
Letter 230 ..... Naymel Khan
Letter 231 ..... Ann Kiliany (Letter 1 of 2, 03/15/24)
Letter 232 ..... Karl Kiliany
Letter 233 ..... Ann Kiliany (Letter 2 of 2, 02/20/24)
Letter 234 ..... Dianah Kalibbala
Letter 235 ..... Courtney Kimmel
Letter 236 ..... Katerina Kutsenko
Letter 237 ..... Kathleen Kincheloe
Letter 238 ..... Knopp
Letter 239 ..... Trina Knutsen
Letter 240 ..... Rhonda Kurtz
Letter 241 ..... Brian Larsen
Letter 242 ..... Allan Lashbrook
Letter 243 ..... Tiffany and Anthony J Latino Jr., and Sharon Garsee (Letter 1 of 2, 02/11/24)
Letter 244 ..... Tiffany and Anthony J Latino Jr., and Sharon Garsee (Letter 2 of 2, 02/11/24)
Letter 245 ..... Jerry Lawson
Letter 246 ..... Amy Lee
Letter 247 ..... Margaret Lemke and Micki Lemke
Letter 248 ..... Margaret Lemke (Letter 1 of 2, 03/07/24)
Letter 249 ..... Micki Lemke
Letter 250 ..... Margaret Lemke (Letter 2 of 2, 02/08/24)
Letter 251 ..... Shelby Leni
Letter 252 ..... Linda and Mike Lessner
Letter 253 ..... David Lewis
Letter 254 ..... Jaime Lim
Letter 255 ..... Pamela Lindsay (Letter 1 of 6, 02/12/24)
Letter 256 ..... Pamela Lindsay (Letter 2 of 6, 02/14/24)
Letter 257 ..... Pamela Lindsay (Letter 3 of 6, 03/07/24)
Letter 258 ..... Pamela Lindsay (Letter 4 of 6, 03/15/24)
Letter 259 ..... Pamela Lindsay (Letter 5 of 6, 02/12/24)
Letter 260 ..... Pamela Lindsay (Letter 6 of 6, 02/12/24)
Letter 261 ..... Cynthia Litzko
Letter 262 ..... Scott Lockwood
Letter 263 ..... Wesley Lucey
Letter 264 ..... Lauren Ludlow
Letter 265 ..... Jessica Lynch
Letter 266 ..... Karenda MacDonald
Letter 267 ..... Meredith Manz
Letter 268 ..... Sandy Marquez
Letter 269 ..... Charles L. Marsh
Letter 270 ..... Melissa Masinter

Letter 271 ..... Dana L. Mazza-Youell and Matthew C. Youell
Letter 272 ..... Susan McAtee
Letter 273 ..... Lisa McGlone (Letter 1 of 2, 03/18/24)
Letter 274 ..... Lisa McGlone (Letter 2 of 2, 03/08/24)
Letter 275 ..... Rosanne McHenry (Letter 1 of 2, 02/20/24)
Letter 276 ..... Rosanne McHenry (Letter 2 of 2, 02/17/24)
Letter 277 ..... Alexis McIntire
Letter 278 ..... Keith McKee
Letter 279 ..... Shauna Frost McKinney
Letter 280 ..... Margarete McMahan
Letter 281 ..... Dolores McSweeney (Letter 1 of 2, 03/14/24)
Letter 282 ..... Dolores McSweeney (Letter 2 of 2, 03/10/24)
Letter 283 ..... Richard Melconian and Brenda Melconian (Letter 1 of 2, 03/06/24)
Letter 284 ..... Richard Melconian and Brenda Melconian (Letter 2 of 2, 03/06/24)
Letter 285 ..... Lisa Mendenhall
Letter 286 ..... Karen Fraser-Middleton
Letter 287 ..... Jeff and Cathy Mikles
Letter 288 ..... Christina Milane (Letter 1 of 2, 02/22/24)
Letter 289 ..... Christina Milane (Letter 2 of 2, 02/22/24)
Letter 290 ..... Jim Miller
Letter 291 ..... Kaitlin Miller
Letter 292 ..... Leslie Miller
Letter 293 ..... Mary Miller
Letter 294 ..... Rita Miller
Letter 295 ..... Antoinette Mirabelli
Letter 296 ..... Jeeno Miranda (Letter 1 of 2, 02/28/24)
Letter 297 ..... Jeeno Miranda (Letter 2 of 2, 02/27/24)
Letter 298 ..... MM
Letter 299 ..... Diane Modiste
Letter 300 ..... Sarah Isabel and Nils Moe (Letter 1 of 2, 03/13/24)
Letter 301 ..... Sarah Isabel and Nils Moe (Letter 2 of 2, 03/13/24)
Letter 302 ..... Sarah Isabel Moe
Letter 303 ..... Casey Mohan
Letter 304 ..... Mike Monahan
Letter 305 ..... Tara Moon
Letter 306 ..... Greg Moore (Letter 1 of 3, 03/14/24)
Letter 307 ..... Greg Moore (Letter 2 of 3, 03/14/24)
Letter 308 ..... Laura Moore (Letter 1 of 3, 03/08/24)
Letter 309 ..... Laura Moore (Letter 2 of 3, 03/11/24)
Letter 310 ..... Greg Moore (Letter 3 of 3, 03/13/24)
Letter 311 ..... Laura Moore (Letter 3 of 3, 03/08/24)
Letter 312 ..... Kenneth and Susan Moore
Letter 313 ..... Al Lauer and Kelley Moreno, Megan Moreno, Ken Magee and Antoinette Fabela, Richard and Linda Schlais, John and Wendy Shingle, Mark Cardin, Mike Kelly, Matt and Mahala Archer, Nancy Nebilak and Travis Rose, Maggie Henning, and Tom and Deb Faciana (Letter 1 of 3, 03/05/24)
Letter 314 ..... Al Lauer and Kelley Moreno, Megan Moreno, Ken Magee and Antoinette Fabela Richard and Linda Schlais, John and Wendy Shingle, Mark Cardin, Mike Kelly, Matt and Mahala Archer, Nancy Nebilak and Travis Rose, Maggie Henning, and Tom and Deb Faciana (Letter 2 of 3, 03/05/24)

Letter 315 ..... Al Lauer and Kelley Moreno, Megan Moreno, Ken Magee and Antoinette Fabela Richard and Linda Schlais, John and Wendy Shingle, Mark Cardin, Mike Kelly, Matt and Mahala Archer, Nancy Nebilak and Travis Rose, Maggie Henning, and Tom and Deb Faciana (Letter 3 of 3, 03/05/24)
Letter 316 ..... Terry Mornin
Letter 317 ..... Jeffrey Moss
Letter 318 ..... Tariq Munir
Letter 319 ..... Susana Munoz
Letter 320 ..... Art and Carol Murschel (Letter 1 of 3, 02/14/24)
Letter 321 ..... Art and Carol Murschel (Letter 2 of 3, 02/13/24)
Letter 322 ..... Art and Carol Murschel (Letter 2 of 3, 02/12/24)
Letter 323 ..... MWAC
Letter 324 ..... Bruce Nagle
Letter 325 ..... Katie Nahorn
Letter 326 ..... Karen Nault
Letter 327 ..... Nancy Nebilak (Letter 1 of 2, 03/14/24)
Letter 328 ..... Nancy Nebilak (Letter 2 of 2, 03/06/24)
Letter 329 ..... Jane Negri (Letter 1 of 5, 03/07/24)
Letter 330 ..... Jane Negri (Letter 2 of 5, 03/15/24)
Letter 331 ..... Jane Negri (Letter 3 of 5, 03/18/24)
Letter 332 ..... Jane Negri (Letter 4 of 5, 02/14/24)
Letter 333 ..... Jane Negri (Letter 5 of 5, 02/02/24)
Letter 334 ..... Patty Neifer (Letter 1 of 3, 02/20/24)
Letter 335 ..... Patty Neifer (Letter 2 of 3, 03/06/24)
Letter 336 ..... Patty Neifer (Letter 3 of 3, 02/17/24)
Letter 337 ..... Virgil Nelson
Letter 338 ..... Dorothy Nunley
Letter 339 ..... Alex Nguyen
Letter 340 ..... Desiree Osterback (Letter 1 of 2, 03/18/24)
Letter 341 ..... Desiree Osterback (Letter 2 of 2, 03/13/24)
Letter 342 ..... Blanca Papas
Letter 343 ..... Donna Parada
Letter 344 ..... Wendy Parks
Letter 345 ..... Pixie Patton
Letter 346 ..... Eric and Paula Peach
Letter 347 ..... Karen Pearson
Letter 348 ..... Valerie Peluso
Letter 349 ..... Dean and Kathy Perkins
Letter 350 ..... Stephanie Perlberg
Letter 351 ..... Chris and Stephanie Perlberg
Letter 352 ..... Bob Peterson
Letter 353 ..... Jeff Petit
Letter 354 ..... Dennis and Barbara Peyton
Letter 355 ..... Karen A. Phillips
Letter 356 ..... Rebecca Pierce
Letter 357 ..... Darcie Pillsbury (Letter 1 of 2, 03/08/24)
Letter 358 ..... Darcie Pillsbury (Letter 2 of 2, 02/14/24)
Letter 359 ..... Jasmine Pinder (Letter 1 of 2, 03/01/24)
Letter 360 ..... Jasmine Pinder (Letter 2 of 2, 03/15/24)
Letter 361 ..... Ryan Pinder (Letter 1 of 3, 03/05/24)

Letter 362 ..... Ryan Pinder (Letter 2 of 3, 03/15/24)
Letter 363 ..... Ryan Pinder (Letter 3 of 3, 03/08/24)
Letter 364 ..... Karen and Izzy Plarisan
Letter 365 ..... Karen Plarisan
Letter 366 ..... Molly Plarisan (Letter 1 or 3, 03/08/24)
Letter 367 ..... Molly Plarisan (Letter 2 or 3, 02/12/24)
Letter 368 ..... Molly Plarisan (Letter 3 or 3, 03/05/24)
Letter 369 ..... Fran Predoehl
Letter 370 ..... Kellen Prindiville
Letter 371 ..... Steve Quigley
Letter 372 ..... Dr. Flora Rafii
Letter 373 ..... Tracy Rainsbury
Letter 374 ..... M. Ransdell
Letter 375 ..... Kris and Steve Rath
Letter 376 ..... Ed Reeder
Letter 377 ..... Kathy Remington
Letter 378 ..... Sherrill Renfro (Letter 1 of 3, 03/05/24)
Letter 379 ..... Sherrill Renfro (Letter 2 of 3, 03/16/24)
Letter 380 ..... Sherrill Renfro (Letter 3 of 3, 03/03/24)
Letter 381 ..... Mike Renfro
Letter 382 ..... James and Julianna Rice
Letter 383 ..... Rick Riedman
Letter 384 ..... Charles Riglick
Letter 385 ..... Christian Riolo
Letter 386 ..... Stacy Robinson
Letter 387 ..... Linda Rodriguez
Letter 388 ..... Melissa Roth
Letter 389 ..... Ivette Rothenberg
Letter 390 ..... Aaron Rudolph
Letter 391 ..... Gayle Russell
Letter 392 ..... Delana Ruud
Letter 393 ..... Nick Sadek
Letter 394 ..... Farrukh Saeed
Letter 395 ..... Karly Sahr Plarisan
Letter 396 ..... Pauline Sakai
Letter 397 ..... Rick and Dana Salaices
Letter 398 ..... John and Marie Schell (Letter 1 of 2, 03/07/24)
Letter 399 ..... John and Marie Schell (Letter 2 of 2, 03/08/24)
Letter 400 ..... Jay Schiffman
Letter 401 ..... Richard and Linda Schlais
Letter 402 ..... Jeanine Schulz
Letter 403 ..... John A. Schwarzenberg
Letter 404 ..... David Schweickert Jr.
Letter 405 ..... Rachael Scott
Letter 406 ..... Dean Shankland (Letter 1 of 2, 03/15/24)
Letter 407 ..... Dean Shankland (Letter 2 of 2, 03/08/24)
Letter 408 ..... Ali Sharif
Letter 409 ..... Shewmon
Letter 410 ..... John and Wendy Shingle (Letter 1 of 2, 03/04/24)
Letter 411 ..... John and Wendy Shingle (Letter 2 of 2, 03/04/24)

Letter 412 ..... Paula Shortt
Letter 413 ..... Farzana Shubarna
Letter 414 ..... Javed T. Siddiqui, P.E.
Letter 415 ..... Riaz Siddiqui
Letter 416 ..... Karan Singh
Letter 417 ..... Terri Skondin
Letter 418 ..... Lora Slade
Letter 419 ..... Mona Sousou
Letter 420 ..... Sara Spencer
Letter 421 ..... Cristen and Darren Spicer (Letter 1 of 2, 02/10/24)
Letter 422 ..... Darren Spicer (Letter 1 of 2, 03/13/24)
Letter 423 ..... Darren Spicer(Letter 2 of 2, 03/04/24)
Letter 424 ..... Cristen and Darren Spicer (Letter 2 of 2, 02/10/24)
Letter 425 ..... Nancy Stangel
Letter 426 ..... Jerry and Claudia Starkey
Letter 427 ..... Rebecca Stern (Letter 1 of 2, 02/21/24)
Letter 428 ..... Rebecca Stern (Letter 2 of 2, 01/29/04)
Letter 429 ..... Janice Stevens
Letter 430 ..... Kris Steward
Letter 431 ..... Mark Stroup
Letter 432 ..... Dawn Suits
Letter 433 ..... Aren Swartz
Letter 434 ..... Zac Sweet
Letter 435 ..... Michael Sysum
Letter 436 ..... Tamer Taddross
Letter 437 ..... Holli Tamas (Letter 1 of 2, 03/16/24)
Letter 438 ..... Holli Tamas (Letter 2 of 2, 03/06/24)
Letter 439 ..... Gary Taverrite
Letter 440 ..... Karrie Taylor
Letter 441 ..... Dena Thomas
Letter 442 ..... Debra and Robert Neil Thompsen (Letter 1 of 2, 03/08/24)
Letter 443 ..... Debra and Robert Neil Thompsen (Letter 2 of 2, 03/18/24)
Letter 444 ..... Gregg Thompson
Letter 445 ..... Jennifer Thompson
Letter 446 ..... Courtnee Thorton (Letter 1 of 2, 03/18/24)
Letter 447 ..... Courtnee Thorton (Letter 2 of 2, 02/07/24)
Letter 448 ..... Nancy Thym
Letter 449 ..... Brittany Tiago
Letter 450 ..... Brenda L. Timmins and Donald R. Timmins
Letter 451 ..... Brenda L. Timmins
Letter 452 ..... Kristen Tinucci
Letter 453 ..... Sheila Toner
Letter 454 ..... Marjorie Truppa (Letter 1 of 2, 03/15/24)
Letter 455 ..... Marjorie Truppa (Letter 2 of 2, 03/06/24)
Letter 456 ..... Linda Turner
Letter 457 ..... Aaron Unden
Letter 458 ..... Susan Unden
Letter 459 ..... Del Valadez
Letter 460 ..... Oskar Vierny
Letter 461 ..... Kim Vincent

Letter 462 ..... Ron Volle
Letter 463 ..... Brian Wall
Letter 464 ..... James Wallace (Letter 1 of 3, 03/04/24)
Letter 465 ..... James Wallace (Letter 2 of 3, 03/14/24)
Letter 466 ..... Lindsey Wallace (Letter 3 of 3, 03/18/24)
Letter 467 ..... Lindsey Wallace (Letter 1 of 3, 03/17/24)
Letter 468 ..... Lindsey Wallace (Letter 2 of 3, 03/08/24)
Letter 469 ..... James Wallace (Letter 3 of 3, 03/08/24)
Letter 470 ..... Sasha Warren
Letter 471 ..... Craig Watts (Letter 1 of 3, 03/04/24)
Letter 472 ..... Craig Watts (Letter 2 of 3, 03/08/24)
Letter 473 ..... Craig Watts (Letter 3 of 3, 03/01/24)
Letter 474 ..... Terry Webb
Letter 475 ..... Coree Wehr
Letter 476 ..... Susan Weinstein
Letter 477 ..... Dani Weinstein
Letter 478 ..... Jaime Welcher
Letter 479 ..... Wanda Ferranti West
Letter 480 ..... Herb Whitaker (Letter 1 of 2, 03/18/24)
Letter 481 ..... Herb Whitaker (Letter 2 of 2, 03/13/24)
Letter 482 ..... Frances White
Letter 483 ..... Joseph White
Letter 484 ..... Alice Meltzer Wiens
Letter 485 ..... Andre Wiens
Letter 486 ..... James and Victoria Wilcox
Letter 487 ..... Yvette A. Williams
Letter 488 ..... Laura Wolfrey
Letter 489 ..... Liz Wray (Letter 1 of 3, 03/14/24)
Letter 490 ..... Liz Wray (Letter 2 of 3, 02/22/24)
Letter 491 ..... Liz Wray (Letter 3 of 3, 03/12/24)
Letter 492 ..... Susan Yomogida
Letter 493 ..... Jaime Zezini
Letter 494 ..... Laura Zuckerman

In addition, 50 verbal comments were received during the public hearing held on February 22, 2024 to solicit public comments regarding the Draft EIR. A summary of the comments from the Draft EIR comment hearing are included as Letter 495.

Letter 495 ..... Summary of Verbal Comments: Draft EIR Public Hearing (February 22, 2024)

1.5 ORGANIZATION OF THE FINAL EIR

The Final EIR is organized into the following chapters:

1. Introduction and List of Commenters

Chapter 1 provides an introduction and overview of the document, describing the background and organization of the Final EIR. Chapter 1 also provides a list of commenters who submitted letters in response to the Draft EIR.

2. Responses to Comments

Chapter 2 presents the comment letters received and responses to each comment. Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. For example, the first comment in Letter 1 would have the following format: 1-1. The response to each comment will reference the comment number.

3. Revisions to the Draft EIR Text

Chapter 3 summarizes minor changes made to the Draft EIR text since its release.

4. Mitigation Monitoring and Reporting Program

CEQA Guidelines, Section 15097, requires lead agencies to adopt a program for monitoring the mitigation measures required to avoid the significant environmental impacts of a project. The intent of the Mitigation Monitoring and Reporting Program (MMRP) is to ensure implementation of the mitigation measures identified within the EIR for the Housing Element Rezone Sites Project.

2. Responses to Comments

2. RESPONSES TO COMMENTS

2.1 INTRODUCTION

The Responses to Comments chapter contains responses to each of the comment letters submitted regarding the Housing Element Sites Rezone Project (proposed project) Draft EIR during the public review period and a response to the verbal comments received at the hearing to receive public comment on the Draft EIR.

The County appreciates the time and effort taken by commenters to express their views and concerns as a part of this process. These views and recommendations are considered by County staff in developing the staff recommendation, and by the Planning Commission and Board of Supervisors in their deliberations and decision-making regarding certification of the EIR and adoption of the proposed project.

2.2 MASTER RESPONSES

Many of the commenters raised similar concerns regarding the proposed project. For such concerns, the County has prepared master responses. Through master responses, the County can address the common topics in a comprehensive manner and without duplication in the individual responses. Some of the thematic comments submitted on the Draft EIR pertain to issues that are not considered significant impacts on the environment under CEQA, as will be discussed in Master Responses 1, 2, and 3. Such issues include administrative issues, social and economic impacts, and site selection as it relates to County-owned properties. The remaining thematic comments are primarily in regard to traffic safety, level of analysis contained within the EIR, and impacts to local schools, which are addressed through Master Responses 4 through 6 presented below.

Summary of Master Responses

The following is a summary of the master responses provided below.

- Master Response 1: Non-EIR/Administrative Issues
- Master Response 2: Social and Economic Impacts
- Master Response 3: County-Owned Sites
- Master Response 4: Traffic Safety
- Master Response 5: Programmatic EIR vs. Site-Specific EIR
- Master Response 6: Impacts to Local Schools

Master Response 1 - Non-EIR/Administrative Issues

Comments

The CEQA Guidelines frame the scope and focus of review and the extent, nature and scope of responses by a lead agency to comments on a Draft EIR. This Final EIR addresses specific comments pertaining to environmental impact analyses contained within the EIR and acknowledges comments not related to environmental impact and analysis. However, a number of comments received expressed the commenter's opinion on approval or denial and/or

expressed general environmental concerns. This section provides a response to these types of comments, which are either general or unrelated to the Project's impacts on the physical environment.

Discussion

CEQA Guidelines Section 15204. FOCUS OF REVIEW

> (a) In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. 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. At the same time, reviewers should 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. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.
>
> (c) Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

Notwithstanding the above guidelines language, CEQA Guidelines section 15204(e) states that these limitations should "not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

Comments on Merits of Project

The environmental review process provides an impartial evaluation of the environmental impacts should the proposed project be implemented and not opinions on whether the project should be approved or denied. The County is the public agency with land use authority and the Community Development Resource Agency is the primary County agency providing information and recommendations on land development to the Planning Commission and Board of Supervisors. The decision-makers, typically the Planning Commission and/or Board of Supervisors, weigh factors outside the scope of the EIR, including public support, taxes, jobs, economic benefits, and other non-environmental factors, in considering approval of a project.

Comments in support/opposition of the project do not convey environmental impacts; therefore, such comments are hereby noted and referred to the decision-makers for consideration in their deliberations for approval or denial of the project.

Pursuant to the CEQA Guidelines, in reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. When responding to comments, lead agencies need only respond to significant environmental issues. This master response recognizes that many public comments submitted on the Draft EIR

are outside of the scope of CEQA; and thus, do not require a specific response from the County. Nevertheless, this Final EIR includes all comments for the record and review and consideration by the decisionmakers.

General Comments Pertaining to Environmental Concerns

Comments that voiced general opposition to or support for the proposed project often were combined with other general statements about environmental concerns (e.g., air quality, traffic, noise). According to CEQA Guidelines Section 15088, "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment." Thus, when a commenter expresses general concerns like the proposed project would result in "more traffic", "increased traffic safety hazards", "increased air pollution", or "increased noise", a specific response is not offered. Rather, the commenter is referred to those sections of the Draft EIR where the referenced general concern is evaluated in detail. For example, project-related traffic and potential traffic safety hazards are programmatically evaluated in Chapter 8, Transportation, of the Draft EIR. The project-related increase in air quality emissions and the related effect on the surrounding environment is programmatically addressed in Chapter 4, Air Quality and Greenhouse Gas Emissions, and potential impacts related to noise and vibration associated with construction and operation of future development associated with the proposed project are programmatically addressed in Chapter 7, Noise, of the Draft EIR, etc.

It is also noted that many comments expressed concerns related to how future potential residential development on rezone sites could increase traffic congestion on surrounding roadways. While traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA.

As discussed in the Draft EIR (Chapter 8), at the beginning of 2019, updated California Environmental Quality Act (CEQA) Guidelines went into effect. The new Guidelines require CEQA lead agencies such as Placer County to transition from using "level of service" (LOS) to "Vehicle Miles Traveled" (VMT) as the metric for assessing transportation impacts under CEQA (see Section 15064.3). The State's requirement to transition from LOS to VMT is aimed at promoting infill development, public health through active transportation, and a reduction in greenhouse gas (GHG) emissions. Pursuant to the Guidelines, any project that did not initiate CEQA public review prior to July 1, 2020 must use VMT rather than LOS as the metric to analyze transportation impacts. LOS will still be used by the County for purposes of determining consistency with general plan and community plan goals and policies but is no longer used for determining significant impacts under CEQA. The County adopted the Placer County Transportation Study Guidelines (TSG) in November 2020 to reflect the changes described above by establishing analysis techniques for transportation studies based on the current state-of-the-practice in transportation planning and engineering.

Thus, in the case of traffic operations, specifically intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately programmatically reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers. Additionally, each individual

site will be required to prepare a site-specific transportation study consistent with the requirements of the TSG if the site is proposed for development. At that time, details regarding the project location, access points, size, density, traffic patterns, mode splits, and other relevant features that are unknown today will be provided by the project applicant. These site-specific project characteristics are needed to analyze the project's full transportation effects. The site-specific transportation study will include analysis of traffic operations (congestion), safety, on-site circulation, and multi-modal connections. The site-specific study will be required through the Subsequent Conformity Review process, reviewed by County staff, and made available to the public for review before any discretionary actions are taken on proposed entitlements of the proposed project's sites. Additionally, all new development will be subject to the County's traffic fee program and various regional fee programs. Through payment of traffic fees, the project applicant would contribute the project's fair share for transportation projects within the fee district where the project is located and throughout Placer County.

Master Response 2 - Social and Economic Impacts

Comments

Select comments submitted on the Draft EIR state that the project would result in social or economic impacts, such as potentially having an effect on neighboring property values or quality of life.

Discussion

The scope of an EIR is limited to a lead agency's evaluation of potentially significant environmental impacts of a project, which by definition are limited to physical conditions, rather than social or economic conditions (Public Resources Code [PRC] Section 21060.5; CEQA Guidelines Section 15360). The analysis of social or economic impacts unrelated to a physical change is not included within an EIR because such potential impacts are not considered to be effects on the environment (CEQA Guidelines Sections 15064[e], 15131[a], 15358[b], 15382). Therefore, potential social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment, are not substantial evidence of a significant environmental effect (PRC Section 21080[e][2]; CEQA Guidelines Section 15064[f][6]).

California courts have routinely dismissed challenges to projects under CEQA when premised on potential social or economic impacts. (see *Clews Land & Livestock, LLC v. City of San Diego* [2017] 19 Cal.App.5th 161, 196 [potential effect of project's noise on nearby business's economic viability not reviewable under CEQA]; *Chico Advocates for a Responsible Economy v. City of Chico* [2019] 40 Cal.App.5th 839, 846–48 [loss of close and convenient shopping not an environmental issue subject to CEQA review]; *City of Hayward v. Board of Trustees of the California State University* [2015] 242 Cal.App.4th 833, 840–47 [project's potential economic impacts on costs of providing public services not a cognizable environmental impact under CEQA]; *Maintain Our Desert Environment v. Town of Apple Valley* [2004] 124 Cal.App.4th 430, 446 ["social, economic and business competition concerns are not relevant to CEQA analysis unless it is demonstrated that those concerns will have a significant effect on the physical environment"]; *Preserve Poway v. City of Poway* [2016] 245 Cal.App.4th 560, 576–82 [change in community character is a social and psychological impact not reviewable under CEQA]).

Property Values

More specifically, courts have dismissed CEQA challenges that are based on an assertion that a project will have an adverse impact on nearby property values. For example, in *Porterville Citizens*

for Responsible Hillside Development v. City of Porterville (2007) 157 Cal.App.4th 885, neighboring landowners expressed concern that a housing project would have the effect of lowering their property values. The Court of Appeal held that such concerns were not reviewable under CEQA and were not substantial evidence of an environmental effect. The Court confirmed:

> CEQA is not an economic protection statute. Landowners surrounding a proposed project site do not state a valid CEQA concern when they express fears that the proposed project could adversely affect their property value.

(*Porterville Citizens*, 157 Cal.App.4th at 903 [citing *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1205 *and* CEQA Guidelines Section 15131(a)]). The California Supreme Court subsequently denied review of the *Porterville Citizens* decision. Therefore, the court's holding remains valid and CEQA concerns have not been raised.

Further, evidence that physical effects to other properties would occur as a result of the proposed project does not exist, nor does evidence exist that the proposed project would result in reduction of property values, or that if such reduction in property values happened to occur, such reduced values would result in physical effects subject to CEQA review. Comments regarding the project's potential to affect property values are hereby noted and referred to the decision-makers for consideration in their deliberations for approval or denial of the proposed project.

Quality of Life

Other comment letters oppose the proposed project because it would allegedly affect the nature of the community, particularly in rural areas, or otherwise negatively affect residents' perceived current quality of life.

In enacting CEQA, the California Legislature declared policies explaining its intent. Included were:

> Public Resources Code, Section 21000-21001:
>
> - The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.
> - It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
> - The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
> - Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.

The EIR process undertaken by the County has been accomplished in a manner consistent with the CEQA statute and guidelines. CEQA is not a tool to forestall any and all changes to the environment, but rather to establish thresholds and manage such changes accordingly, while meeting the economic requirements and needs of the community.

To this end, the CEQA statute and guidelines confirm that environmental needs must at times be secondary to economic and social needs, and authorized lead agencies, after considering the environmental consequences, to approve projects in spite of one or more significant effects:

> Public Resources Code, Section 21002:
>
> The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

Thus, CEQA acknowledges that a project may be approved despite environmental effects. The environmental review process focuses on physical impacts to the environment. Therefore, quality of life comments are hereby noted and referred to the decisionmakers for consideration in their deliberations for approval or denial of the proposed project.

Based on the above, comments concerning potential social or economic effects of the project, when not contributing to, or when not caused by, a physical change to the environment, need not be analyzed or addressed further in this EIR.

Master Response 3 - County-Owned Sites

Comments

Many of the comments received on the Draft EIR have questioned why more candidate rezone sites have not been identified on County-owned property.

Discussion

The Placer County 2021-2029 Housing Element identified 406 lower-income units on County-owned property at the Placer County Government Center in North Auburn. Other affordable housing projects on County-owned property include Dollar Creek Crossing in the Tahoe Basin and Sabre City in the western portion of the County.

The Draft EIR considered but rejected an alternative focused on County-owned properties. As stated on page 12-6 of the Draft EIR:

> Publicly-owned lands were evaluated within Appendix D of the Placer County Housing Strategy and Development Plan, Housing Opportunity Site Evaluation Tool. In considering sites potentially available for future development, the objectives of the proposed project and development feasibility were used to assess the suitability of available sites. While some publicly-owned sites were ranked highly by the Site Evaluation Tool, such sites were not considered for the rezone due to either existing development on the site, being owned by other public agencies other than Placer County, or being too small unless aggregated with an adjacent site. For example, parcels identified by Accessor's Parcel Number (APN) 051-120-067 and 051-120-065 are owned by Placer County, but are developed with Home Depot and Mercy Housing, respectively. Parcels identified by APNs 112-090-001, -002, -003, -004 are publicly-owned by a public agency other than Placer County. Parcels identified by APNs 090-142-001, -002, -011, -029 are owned by Placer County, but are too small unless aggregated with an adjacent site.

County staff has identified two County-owned properties that could potentially support multi-family residential development; however, an amendment to the Sunset Area Plan (SAP), where the sites are located, would be required in order to develop multi-family residences on the two additional sites. These two sites were identified well into the EIR process and could not be added to the sites list evaluated by this EIR. The SAP amendment is moving forward under a separate Addendum.

In summary, the County has carefully considered the suitability of County-owned properties for purposes of rezoning to accommodate future residential development, and based on substantial evidence, determined that such sites are not suitable to accommodate the objectives of the proposed project.

Master Response 4 - Traffic Safety

Comments

Many of the comments received on the Draft EIR have expressed concerns related to roadway safety hazards and how vehicle trips associated with future residential development on the rezone sites could result in additional vehicle and/or pedestrian safety hazards.

Discussion

Impacts related to vehicle safety hazards were programmatically discussed under Impact 8-3 of the Draft EIR. As discussed therein, the proposed project does not include any site-specific development plans, designs, or proposals at this time. As such, the project's potential to substantially increase hazards to vehicle safety due to a geometric design feature cannot be specifically evaluated at this time. However, all new developments that occur within the County would be required to comply with all applicable design standards as part of constructing or modifying the transportation system. For example, Policy 3.A.2 of the Placer County General Plan requires all streets and roads to be constructed in accordance with General Plan, community plan, and specific plan standards. The County also has adopted roadway and encroachment standards in the Placer County Land Development Manual. The manual was recently updated in 2023 to reflect current roadway and encroachment standards. Furthermore, the foreseeable residential development on the rezone sites would not introduce incompatible uses, such as farm equipment or heavy-duty truck traffic, to area roadways during operations.

In addition to requiring developments within the County to comply with applicable design standards, Placer County also maintains multiple ongoing programs and procedures to monitor and address traffic safety concerns:

- The County developed a Local Roadway Safety Plan (LRSP),[1] adopted in 2021, which is planned to be updated every five years in collaboration with the California Highway Patrol (CHP). The LRSP establishes a framework and process for identifying, analyzing, and prioritizing roadway safety improvements on County roadways. The report analyzed five years of Countywide collision trends on County-maintained roadways, including collision location and severity, pedestrian and bicycle-involved collision trends, collision types (hit object, rear-end, etc.), primary collision factors (unsafe speed, improper turning, driving under the influence [DUI], etc.). The LRSP also analyzed traffic enforcement data for speeding, DUI's, and other violations. Through this analysis, the LRSP identified

[1] Placer County. *Local Roadway Safety Plan*. March 9, 2021.

Emphasis Areas intended to efficiently direct resources towards the highest priority systemic collision patterns for safety improvements.

- In addition to the LRSP, the County analyzes traffic collisions on an annual basis. The annual review includes locations with the highest collision rates for the Emphasis Areas, as described in the LRSP. The annual review includes detailed review of collision reports, identification of collision trends, site visits, assessment of existing traffic control devices and warning signs, recommendations for roadway improvements, and follow-up implementation.
- The County applies every two years for Highway Safety Improvement Program (HSIP) grants from Caltrans to fund improvements to address safety concerns. Recent projects include the Roadway Safety Sign Audit and Upgrade Project, enhanced pedestrian crosswalks, high friction surface treatment, guardrail replacements, traffic signal upgrades, and enhanced pavement markings.
- The County operates Placer Connect, a community resource for reporting concerns of any type. Concerns are reported by the public and routed to the most appropriate County staff person, who reviews the complaint, contacts the resident, collects data and/or performs a site visit, and follows up with the resident on how the concern will be addressed.
- Every traffic safety concern submitted by the public (by email, phone call, in-person, or Placer Connect) is reviewed and responded to by County staff.
- For residential neighborhoods, the County administers the Neighborhood Traffic Management Program (NTMP). The NTMP is a community-led program that brings traffic calming strategies to local residential streets. Through this program, the County facilitates community meetings with residents to understand concerns, collects data to quantify the issue, and develops recommendations to address the issue. The strategies are voted on by local residents and implemented by the County if there is support and agreement among the residents.
- In addition to the programs above, the County conducts regular coordination with the CHP for additional traffic enforcement.

Implementation of the foregoing programs helps to ensure that all development within the County does not increase hazards to vehicle safety.

Master Response 5: Programmatic EIR vs. Site-Specific EIR

Comments

Many of the comments received on the Draft EIR have expressed that a site-specific EIR should be prepared for the rezone sites.

Discussion

The CEQA Guidelines provide: “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” (CEQA Guidelines, Section 15146). This section specifically notes that, “an EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance…should focus on the secondary effects that can be expected to follow from the adoption or amendment of a comprehensive zoning ordinance…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” (CEQA Guidelines, Section 15146[b]).

The Chapter 1, Introduction, of the Draft EIR discusses how a program-level analysis for the proposed project is appropriate because:

- Site-specific details, including development proposals or technical studies, are not available at this time;
- The General Plan Amendment, Housing Element, Zoning Text Amendment, and Rezone cover a defined geographic area, with similar land use characteristics; and
- A program-level analysis provides the County with the opportunity to consider "broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts" (CEQA Guidelines Section 15168(b)(4).

If development is proposed on a rezone site, the County intends to use the streamlining/tiering provisions of CEQA to the maximum feasible extent, so that future environmental review of specific projects can rely when appropriate on the Draft EIR without the need for repetition and redundancy, as provided in CEQA Guidelines Section 15152 (Tiering) and elsewhere. Specifically, pursuant to CEQA Guidelines Section 15183, streamlined environmental review is allowed for projects that are consistent with the development density established by zoning, community plan, specific plan, or general plan policies for which an EIR was certified, unless such a project would have environmental impacts peculiar or unique to the project or project site. Likewise, PRC Section 21094.5 and CEQA Guidelines Section 15183.3 also provide for streamlining certain qualified, infill projects. In addition, CEQA Guidelines Sections 15162-15164 allow for preparation of a Subsequent (Mitigated) Negative Declaration, Supplemental or Subsequent EIR, and/or Addendum, respectively, to a certified EIR when certain conditions are satisfied.

Master Response 6: Impacts to Local Schools

Comments

Many of the comments received on the Draft EIR have expressed concerns related to impacts to schools resulting from the project including schools that are "at-capacity" or school districts that have had recent campus closures. Many comments also specifically questioned the safety of students at Cavitt Junior High School if development of Rezone Site #26 occurs and traffic increases; traffic safety impacts are discussed above in Master Response 4.

Discussion

Impacts related to new school facilities were programmatically addressed under Section XV, Public Services, of the Initial Study. As discussed therein, the proposed project does not include any site-specific development plans, designs, or proposals at this time. However, the reasonably foreseeable consequence of the proposed project is future development of the rezone sites; such development would result in an increase in the student population of the County, which would result in an increased demand on schools. If a residential project is proposed on a rezone site, the development would be subject to payment of applicable school impact fees to fund necessary facility improvements at the school districts serving the project.

In addition, according to Senate Bill (SB) 50, payment of the necessary school impacts fees for projects would be considered full and satisfactory CEQA mitigation. Proposition 1A/SB 50 prohibits local agencies from using the inadequacy of school facilities as basis for denying or

conditioning approvals of any '[…] legislative or adjudicative act […] involving […] the planning, use, or development of real property" (Government Code 65996[b]). Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which would cause significant environmental impacts in order to maintain performance objectives for maintenance of schools.

2.3 RESPONSES TO COMMENTS

The following 494 letters were received by the County during the public comment period for the Draft EIR. Each bracketed comment letter is followed by numbered responses to each bracketed comment. In addition, comments from 50 verbal commenters were received during the public hearing held by the Planning Commission on February 22, 2024 to solicit public comments on the Draft EIR. A numbered response is provided to the verbal comments, following the responses to the 494 letters. The responses amplify or clarify information provided in the Draft EIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project that are unrelated to its environmental impacts) are noted for the record. Where revisions to the Draft EIR text are required in response to the comments, such revisions are noted in the response to the comment, and are also listed in Chapter 3 of this Final EIR. All new text is shown as double underlined and deleted text is shown as ~~struck through~~.

The changes to the analysis contained in the Draft EIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with CEQA Guidelines, Section 15088.5, recirculation of the Draft EIR is not required. Each letter has been considered by the County and addressed, according to CEQA Guidelines Section 15088, prior to certification of this Final EIR.

Letter 1

PLACER COUNTY
AIRPORT LAND USE
COMMISSION

ALICE DOWDIN CALVILLO
City of Auburn
TRINITY BURRUSS
City of Colfax
PAUL JOINER
City of Lincoln
AMANDA CORTEZ
Town of Loomis
KEN BROADWAY
City of Rocklin
BRUCE HOUDESHELDT
City of Roseville
JIM HOLMES
SUZANNE JONES
Placer County
DAN WILKINS
Citizen Representative
MATT CLICK, AICP
Executive Director

February 29, 2024

Chris Pahule, Planning Director
Placer County Planning Services Division
3091 County Center Drive
Auburn, CA 95603

RE: Placer County Airport Land Use Commission Consistency Determination
Case No. 2023/24-03: Placer County Housing Element Rezone Project

On January 22, 2024, Placer County submitted a request to the Placer County Airport Land Use Commission (ALUC) to review the proposed Placer County Housing Element Rezone Project for consistency with the Placer County Airport Land Use Compatibility Plan (ALUCP). Under State law the rezone and associated amendments to the General Plan, the Housing Element, and Chapter 17 Zoning ordinance are subject to mandatory ALUC review. Before Placer County can take final action to approve the Housing Element Rezone Project, the ALUC must determine whether the proposal is consistent with the ALUCP.

The ALUCP establishes land use compatibility criteria and zones based on four factors: noise, safety, airspace protection, and overflight provisions. The enclosed ALUC consistency analysis recommends that approval of the Housing Element Rezone Project by the Placer County Board of Supervisors include the following conditions:

1-1

1. ***The proposed project is consistent with ALUCP safety provisions provided rezone sites in Compatibility Zones C1 and C2 comply with ALUCP Policy 3.6.1. The portion of Site #43 within Compatibility Zone C1 would need to be developed as an alternative use, such as parking, open or public space. Residential would not be permitted in the portion of Site #43 in Compatibility Zone C1.***

2. ***The project is consistent with ALUCP airspace protection provisions provided any structures, including construction cranes, do not exceed 150 feet in height, which would require an airspace review by the FAA.***

3. ***The project is consistent with ALUCP overflight provisions provided residential projects in Compatibility Zones C1 and C2 require buyer awareness measures, including recorded Overflight Notifications.***

1-2

Based on the foregoing, the ALUC determined on February 28, 2024, that the proposed Housing Element Rezones Project is consistent with the 2021 ALUCP subject to the aforementioned conditions. Please note, the project's Notice of Preparation indicated additional sites could be added later if necessary. Any such additions located within an airport influence area would be

299 Nevada Street • Auburn, CA 95603 • (530) 823-4030 (tel/fax)

1-2 (cont.)

subject to ALUC review because they would be proposed after ALUC review of the current proposal.

If you have any questions regarding the ALUC consistency determination, please contact David Melko of my staff at (530) 823-4090, or email at dmelko@pctpa.net. Also, please thank Kally Kedinger-Cecil for her effort to facilitate this ALUC review.

Sincerely,

Matt Click, AICP
Executive Director

Encl: ALUC Staff Memo - ALUC Placer County Housing Element Rezone Project Consistency Determination

c: Placer County Airport Land Use Commission
Chris Schmidt, Placer County Planning Services Division
Kally Kedinger-Cecil, Placer County Planning Services Division
Jonathan Wright, City of Auburn
Tyghe Richardson, City of Auburn
Matthew Friedman, Caltrans Division of Aeronautics Office of Aviation Planning
Rick Carter, PCTPA
David Melko, PCTPA

2260 Douglas Blvd, Ste 130 • Roseville, CA 95661 • (530) 823-4030 (tel/fax)

LETTER 1: MATT CLICK, PLACER COUNTY AIRPORT LAND USE COMMISSION

Response to Comment 1-1

The comment is noted for the record. The County will condition future residential development on the rezone sites to comply with the conditions listed in Letter 1, as applicable.

Response to Comment 1-2

It is noted that while the original site list for the proposed project included 72 properties, on February 13, 2024, the County Board of Supervisors directed staff to continue consideration of only 19 sites for inclusion of the rezone program. Additional sites within an airport influence area would not be identified as part of the proposed project, and additional ALUC review is not required.

Letter 2

CITY OF AUBURN
1225 LINCOLN WAY • AUBURN, CA 95603 • PHONE (530) 823-4211 • FAX (530) 885-5508

March 18, 2024

Placer County Community Development Resource Agency (CDRA)
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Subject: Comments on Draft EIR for the Placer County Housing Element Rezone Project

Dear CDRA Staff and Placer County Supervisors:

2-1 The City of Auburn (City) is submitting this letter to provide its comments on the Draft Environmental Impact Report (DEIR) for the Placer County Housing Element Rezone Project. The City appreciates the efforts of County staff and elected officials to be responsive to the City's concerns, as well as the County's efforts to comply with State housing mandates and meet the housing needs of its residents. We recognize that this task requires balancing competing objectives.

Context and Assumptions

The City has worked closely with Placer County CDRA to refine the list of sites to be rezoned. We expressed concerns with the initial list published in Fall 2023, which disproportionately relied on the unincorporated Auburn Sphere of Influence to meet the County's future housing needs. Many of these concerns are expressed in our comments on the Notice of Preparation (NOP) transmitted on November 20, 2023, and some will be reiterated in this comment letter.

2-2 Our review of the proposed zoning changes was facilitated by work sessions with Placer County CDRA staff on November 3 and December 12, 2023, and January 4 and February 16, 2024. At each meeting, we discussed our concerns with specific sites as well as the cumulative effects of the proposed rezoning on Auburn's municipal airport, circulation system, infrastructure, community services, and evacuation capacity. We also stressed and continue to stress the importance of working collaboratively with Placer County, since the City is in the process of updating its own General Plan at this time. Many of the sites evaluated in the DEIR are in the Auburn Planning Area and the City is actively working to determine their future land use designation. We appreciate that the County has been receptive to our input.

In our initial comments on the NOP, we noted that 45 percent of the 72 properties proposed for rezoning were located in the Auburn sphere of influence. The County estimated that these 42 sites could yield 3,138 housing units under their new zoning. We pointed out that North Auburn has 12 percent of the County's unincorporated area population but was being assigned 42 percent of the County's lower income housing capacity. As our November 20, 2023 letter stated, the median income in unincorporated North Auburn is already substantially below the County average, and further concentration of affordable units within this area could run counter to the countywide goal of affirmatively furthering fair housing.

2-2 cont.

Our November 20, 2023 letter also noted that Sites 71 and 72 (located at 85 Lincoln Way) were not among the sites originally considered in the County Housing Element and were late additions to the list. This concerned us not only because of the lack of prior community notification that these sites were being considered, but also because they should logically be annexed to the City prior to any change in use. The sites are adjacent to the City limits and urbanized parts of Auburn, rely on Auburn streets, and would be served by City sewer.

Based on our meetings with the County, it is our understanding that the list of sites under active consideration for rezoning has been reduced from 72 sites to 19 sites. A table provided to us by CDRA staff on February 16, 2024 indicated that the updated list includes six sites in the unincorporated Auburn sphere of influence, totaling 18.3 acres with an estimated capacity of 370 units. Unincorporated Auburn now represents 27 percent of the countywide rezone capacity, compared to the 42 percent proposed initially.

2-3

The City appreciates the reduction from 3,138 units to 370 units in its sphere of influence, as it substantially lessens potential impacts on Auburn. However, it does not eliminate impacts entirely and we continue to have concerns about some of the remaining sites. These are articulated in this letter, particularly with regard to the findings of the Draft EIR.

It is our understanding that the sites under active consideration in the unincorporated Auburn Sphere of Influence are as follows:

- Site 34 (Canal Street), 5.6 acres with the potential for 112 units
- Sites 42 and 43 (access via Graegle Ln), 3.7 acres, with the potential for 74 units
- Site 51 (Plaza Way at Willow Creek Dr), 1.8 acres, with the potential for 36 units
- Sites 71 and 72 (85 Lincoln Way), 7.2 acres, with the potential for 148 units

As these are the sites currently under consideration for rezoning, our comments focus on these properties. In the event the County restores sites in the Auburn sphere of influence to the list or "substitutes" new sites in the Auburn sphere not previously analyzed, we will have comments about the potential for additional impacts. We have included a global comment below that expresses general concerns about the disconnect between the "project" as described in the DEIR and the action that is now under consideration by the Board of Supervisors.

2-4

Specific Comments



2-5

1. **The "Project" being evaluated in the Draft EIR is fundamentally different from the rezoning action now under consideration by the Board of Supervisors**

We have an overarching concern about the DEIR, which is that evaluates a project that is substantially different from the rezoning proposal now under consideration by the Board of Supervisors. The DEIR considers the impacts of rezoning 72 scattered sites totaling 235.1 acres, consistent with the County's initial proposal presented in 2023. As defined in the DEIR Project Description, the project would create the capacity for 7,053 housing units, thereby closing a 1,257-unit deficit for high density (30 units/acre) housing sites required by the State of California to meet the County's Regional Housing Needs Allocation. Several alternatives are addressed in the DEIR, including two that assume a smaller number of sites and units.

As noted in the previous section of our letter, it is our understanding that the list of 72 sites has been reduced to 19 sites totaling 67.9 acres with an assumed capacity of 1,386 units. Additionally, the number of units and capacity of each site has been changed since the DEIR was prepared, with fewer units now being presumed on each site. The updated list of sites does not match either of the alternatives considered in the DEIR.

We recognize that the 19 sites now under consideration were among the 72 originally listed in the DEIR, and that the DEIR has evaluated the impacts of their rezoning (along with 53 other sites no longer under consideration). It might be argued that the DEIR therefore evaluates a "worst case scenario." However, the nature and extent of the impacts associated with the smaller list of sites and the lower buildout assumptions could result in different conclusions than the DEIR, making the document a flawed tool for the disclosure of potential impacts. The EIR should evaluate the smaller list of sites, thereby allowing for a more focused, nuanced, and ultimately more accurate assessment of the rezoning program, along with mitigation measures that align more closely with the sites actually being rezoned. Simply put, evaluating the impacts of rezoning 19 sites and 1,386 units requires a different analysis than evaluating 72 sites and 7,053 units.

2-6

We understand the County's time constraints and the urgency of its rezone project. We further recognize that these time constraints mean it may be infeasible to redo the EIR to only include the smaller list of sites. However, we request that at minimum the County revise its Project Description to explain the changes made between the Notice of Preparation and the adoption of the EIR, and the ways in which these changes may affect the findings, mitigation measures, and the expected level of CEQA clearance required for future projects. The Project Description should also address the extent to which the County may use this EIR to provide CEQA clearance for future zoning changes to the 53 sites that are *not* proposed for rezoning at this time. This could be a concern for the public, who are currently focusing comments on the 19 shortlisted sites.

2. **The method for calculating the capacity of each site is inconsistent.**

2-7

As we noted in our comments on the Notice of Preparation in November, 2023, the number of housing units on each site in the DEIR was estimated by multiplying the area of each site by 30 units per acre. Thus, Site 34 in Auburn, which is 12.8 acres, was estimated to have the capacity for 384 units. Sites 71 and 72 on Lincoln Way were estimated to have the capacity for 222 units. These assumed yields were used in the DEIR, but they do not reflect the estimates currently under consideration by the county.

The Draft zoning regulations for the County's new RM-30 High Density Zoning District indicate that the 30 unit/acre density applies only to developable areas on each site. It states that steep slopes, sensitive habitats such as wetlands, road easements, and similar uses are to be subtracted from when calculating the yield of a site. Because such a calculation was not provided in the DEIR, the true yield of the rezone sites is unknown. Again, the Draft EIR presumes a "worst case scenario" by counting all sites as 100 percent developable. The Final EIR should provide a more complete inventory of environmental resources on each site and a more precise accounting of potential dwelling units.

We understand that the County is now refining the developable area definitions on some of the sites to incorporate these considerations. For example, we note that the County's February 2024 rezoning proposal has reduced the area of Site 34 from 12.8 acres to 5.6 acres and the presumed yield from 384 units (30 units/acre) to 112 units (20 units/acre). Assumptions have been made about which portions of this site are undevelopable, indicating an additional level of suitability analysis has been performed for this site. This analysis is not discussed or disclosed in the DEIR, although it presumably reflects the presence of natural resources or site conditions such as slopes, wetlands, and easements—at least, on Site 34.

A similar level of analysis has not been provided for Sites 71 and 72, which also have constraints that could render portions of these sites undevelopable. Given the smaller number of sites now being considered for rezoning, a more accurate inventory of natural resources and estimate of the potential yield on each of the 19 "shortlisted" sites should be provided in the Final EIR.

2-8

3. Multi-family residential development on Sites 42 and 43 would be inconsistent with the Airport Land Use Plan, present an aviation hazard that is not addressed by the DEIR, and create a potential constraint for operations at Auburn Municipal Airport.

The City disagrees with the DEIR's conclusion that aviation hazard impacts are less than significant and therefore do not need to be addressed in the DEIR. Our response to the Notice of Preparation expressed our concern that 13 of the 72 sites were located in Land Use Compatibility zones around Auburn Municipal Airport. Upzoning of sites for high-density housing within the Airport Influence Area conflicts with the County's own policies, as expressed in its adopted Airport Land Use Compatibility Plan.[1] Upzoning is also inconsistent

[1] Policy 3.1.4 in the adopted Placer County Airport Land Use Compatibility Plan (2021) states that the compatibility of uses in Airport Influence Areas shall be preserved to the maximum feasible extent. It further states that conversion of land from commercial to residential uses within Compatibility Zone C1 should be "strongly discouraged", while actions in Zone C2 should be subject to "careful consideration of overflight impacts."

with Caltrans guidelines for airport land use planning, which urge "*careful consideration*" of potential overflight impacts when making land use changes around airports.[2]

2-8 cont.

The DEIR's finding that there is no potential for a significant aviation hazard impact indicates that "careful consideration" has not occurred. Our understanding is that amendments to an airport land use compatibility plan are usually sent to a qualified airport planning consultant for review prior to adoption. The ensures the consistency of the amendments with Federal Aviation Administration (FAA) regulations. There is no documentation of such a review in the DEIR.

2-9

We expressed particular concerns about sites #42 and #43, which the 2021 Placer County Housing Element describes as being in Airport Overflight Zones C1 and C2. The Housing Element itself indicated that restrictions on multi-family density apply on these sites and estimated a realistic capacity of only eight units. Site #51, in Zone C2, also remains on the County's shortlist of sites to be rezoned. Despite our earlier objection, these three sites remain on the list of sites now under consideration.

The DEIR Project Description acknowledges that Sites 42 and 43 are subject to Policy 4.3.4(b) of the Airport Land Use Compatibility (ALUC) Plan and would be subject to conditions of approval in the event residential development is proposed. Of the 72 sites evaluated in the DEIR, these are the only two sites subject to this limitation. Yet they remain on the County's shortlist of 19 sites to be rezoned. Policy 4.3.4(b) identifies design features to be included in the event an aircraft "strikes a building", as well as notification requirements for future occupants that they live in an overflight zone. These requirements are intended for existing residentially zoned properties in the overflight zone. They should not be used as justification to create even more residential zoning in the overflight zone. Given that sites 42 and 43 are currently zoned Commercial, that is exactly what is proposed here.

2-10

In addition to the increased aviation hazards associated with multi-family development in the overflight zone, the additional population density in this area could result in airport-related noise issues. The City regularly receives complaints about noise, and increasing population density in the overflight zones would likely lead to additional complaints. The DEIR concludes that because Sites 42 and 43 are outside the 55 dBA contour, there would be no aviation noise impacts. However, the ambient noise environment at these sites is already impacted by Highway 49 and noise from adjacent commercial businesses, and the cumulative effects of these sources and aviation noise could be significant.

We urge the county to remove Sites 42 and 43 from the list of sites under active consideration. We further urge that all sites in the airport flyover area be removed from future consideration for upzoning to higher residential densities. There are more suitable sites in unincorporated North Auburn that could be considered.

[2] Caltrans Division of Aeronautics. https://dot.ca.gov/programs/aeronautics/airport-land-use-planning



2-11

4. Development on the Lincoln Way sites (#71 and 72) and on the Canal Street site (Site 34) would have Land Use Planning impacts that should be addressed by the EIR.

As stated in our November 2023 comments on the NOP, we disagree with the DEIR's conclusion that the land use impacts of the project are "less than significant." County Sites 34, 71, and 72 are not only in the unincorporated Auburn sphere of influence, they are actually adjacent to the Auburn City limits. County Sites 64 and 73 (Edgewood Road) are also adjacent to the City limits, but our understanding is that these sites are no longer being considered for rezoning. Many of the other sites recently removed from the County's list of potential housing sites are also in areas under study by the City as part of its General Plan Update.

Sites 71 and 72 pose a particular concern for the City, as they are functionally part of a neighborhood that is located within the Auburn City limits. Although they are currently unincorporated, the sites effectively form a "notch" in the city boundaries and abut incorporated Auburn on both the east and west sides. This area will receive basic services, including sanitary sewer, from the City and should be annexed to the City prior to any development. The current County zoning on the site envisions single family housing at densities of 2-5 units per acre. The adopted Auburn General Plan supports this designation, as it reflects the land use context of the site, its topography, its proximity to other single family neighborhoods, and location near the State Recreation Area and the rim of the American River Canyon.

The City's land use strategy is to focus higher density housing and mixed use development in the Downtown/ Old Town areas, on underutilized commercial properties, near the train station, and in areas that are walkable, with access to urban services. Sites 71 and 72 do not meet any of these criteria. They are also not within the Highway 49 and Bowman "Green Means Go" zones, where higher densities are encouraged. Allowing high-density multifamily development on an undeveloped greenfield site with access constraints, steep terrain, and in a High Fire Hazard Severity Zone would be inconsistent with the City's land use policies. This creates a land use conflict that should be addressed by the Draft EIR.

Site 34, on Canal Street, presents a different set of land use policy conflicts. This site also adjoins the Auburn City limits but cannot be accessed from the City due to developed single family homes along its eastern property line. While the site is commercially zoned, its context is industrial, with land uses that include auto glass shops, auto detailers, electric motor repair, and truck repair shops. Multi-family development in this location should only be considered in the context of a comprehensive redevelopment plan that addresses land use compatibility, access and circulation improvements, and utilities.

Canal Street itself is substandard, and access to Site 34 is via a narrow "stem" easement that could not accommodate the number of units anticipated. While the City has not yet assigned a Land Use Map designation to Site 34 as part of its General Plan Update, redesignating this property from commercial uses to high-density housing would not be consistent with the City's land use policies. Thus, the inclusion of this site presents a conflict with local land use policy.



2-11 cont.

As noted in our previous comment, development on Sites 42, 43, and 51 would also have land use impacts. They create potential consistency issues with the Airport Land Use Compatibility Plan, in that each of these rezonings would intentionally increase the number of potential units within airport overflight zones. While the impacts of new housing on these sites would be incremental, such actions could ultimately affect operations at Auburn Municipal Airport and threaten its role as an economic driver and capital asset in Auburn.

2-12

5. Development on the Lincoln Way sites (#71 and 72) would have potentially significant impacts on traffic safety and emergency access.

CEQA requires that decision makers consider if a project will "substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections)" or result in "inadequate emergency access" due to narrow road width and limited access points. The Draft EIR concludes that potential impacts related to these criteria are "less than significant" because this is a program-level EIR and there are no site plans for any of the sites.

Sites 71 and 72 are, in fact, located on a sharp curve with limited sight lines and limited points of access to Lincoln Way. The 2-5 unit/acre density permitted by current County zoning reflects that constraint and limits the number of units that could conceivably be built to about 36. The proposed rezoning could allow up to 216 units on the property, a 500 percent increase. This would affect safety and could potentially affect emergency access. The DEIR concludes that existing Placer County policies would mitigate these hazards. However, this site is likely to require annexation by the City and should also be evaluated for its consistency with Auburn's standards and policies. Multifamily housing at 30 units per acre would not be compatible with these standards.

2-13

6. Development on the Lincoln Way sites (#71 and 72), and potentially other sites under consideration, would impact utilities provided by the City of Auburn.

The Draft EIR concludes that the rezoning project would have less than significant impacts on utilities, including sewer and storm drainage systems. We questioned that conclusion in our response to the Notice of Preparation, given that the project (as defined in the DEIR) would create the capacity for more than 3,000 additional housing units in the unincorporated Auburn sphere of influence, including sites that would receive utilities from the City. We appreciate the reduction in the number of sites now under consideration by the County, which would result in only 370 units in the Auburn sphere of influence. This will substantially reduce expected impacts.

Our comments here focus on Sites 71 and 72, as these sites are still under consideration for rezoning. The sites currently have no sewer service. The most cost-effective solution for providing service would be to extend City sewer mains from their current point of termination nearby. The City would seek to recover the cost from the developer, consistent with City policy. As discussed in previous sections, sewer service could not be provided without written



2-13 cont. approval from LAFCo or after annexation is approved by LAFCo. The Draft EIR should consider the effects on City utilities as well as County utilities.

2-14 **7. Development on the Lincoln Way sites (#71 and 72), and potentially other sites under consideration, would impact public services provided by the City of Auburn.**

The Draft EIR concludes that the rezoning project would have less than significant impacts on public services, including police and fire services. We questioned that conclusion in our response to the Notice of Preparation, given that it did not consider potential impacts on City services. For example, the Draft EIR identifies the Placer County Sheriff's Office as the only potentially impacted law enforcement agency. Allowing more than 3,000 additional housing units in the unincorporated Auburn sphere of influence also would impact the Auburn Police Department.

In the case of Sites #71 and 72, there would be an increase in emergency service calls, an increase in traffic collisions, and increased staffing and equipment demands placed on the City. The DEIR indicates that such impacts would be offset by increased property taxes, but this would benefit the County rather than the City.

City fire protection needs also will be strained as a result of development on Sites 71 and 72. Page 10-35 of the Draft EIR notes that staffing and equipment are not considered CEQA impacts. However, Page 10-43 states that additional staffing and equipment will be required and will be funded by Fire Facilities Fees. The City would receive no fees for a project constructed in unincorporated Placer County. Again, this site should logically be annexed to the City as part of any development plan, with facility improvement funds provided to the City rather than the County. While the Auburn Fire Department supports and participates in the concept of "closest resources" as a fire response strategy, the EIR should not presume automatic mutual aid as a way to mitigate potential impacts.

2-15 **8. Development on the Lincoln Way sites (#71 and 72) have potential wildfire-related impacts that should be addressed.**

Again, our comments focus on Sites 71 and 72, since they remain on the "shortlist" of sites under consideration for rezoning. It is worth noting that several other sites covered by this EIR are located in portions of the unincorporated Auburn sphere of influence with wildfire hazard risks. While these other sites have been removed from the County's shortlist, any attempt to use this EIR to provide CEQA clearance for their future rezoning would be a concern for the City.

Sites 71 and 72 are located in a *High* Fire Hazard Severity Zone area and abut a *Very High* Fire Hazard Severity Zone. Rezoning these sites to allow a 500 percent increase in the number of potential units (from 36 to 216) would increase wildfire risks, as well as the number of households that are exposed to these risks. It would make evacuation more difficult, given potentially vulnerable populations residing in new multi-family development, constrained access to Lincoln Way, and the limited capacity and narrow width of Lincoln Way. Increasing



2-15 cont. the population along the rim of the American River Canyon raises concerns about elevated wildfire ignition risks in and around Auburn. These risks should be assessed in the DEIR.

Conclusion

2-16 The City appreciates the opportunity to provide these comments and hopes the County will consider them as it prepare the Final EIR. We wish to particularly thank Chris Pahule and Chris Schmidt for their responsiveness to the City's concerns. We look forward to a continued collaborative relationship with County staff as we continue our respective General Plan Updates and participate in the North Auburn Bowman Community Plan Update.

If you have any questions about our comment letter, please contact Jonathan Wright, Community and Economic Development Director, at jwright@auburn.ca.gov, or 530-823-4211.

Sincerely,

Sean Rabé
City Manager

LETTER 2: SEAN RABE, CITY OF AUBURN

Response to Comment 2-1
The comment provides an introductory statement and does not address the adequacy of the Draft EIR.

Response to Comment 2-2
The comment provides a summary of agency-to-agency coordination to date as well as City of Auburn assumptions. The comment does not address the adequacy of the Draft EIR.

Response to Comment 2-3
The comment provides a summary of the City of Auburn's understanding of how the list of sites under consideration for rezoning has changed. The comment does not address the adequacy of the Draft EIR.

Response to Comment 2-4
The comment explains the City of Auburn's focus of review and directs the reader to a global comment related to the project description. Please see response below related to the City's specific comments on the project description.

Response to Comment 2-5
The project description in the Draft EIR remains unchanged. As stated on page 3-3 of Chapter 3, Project Description, of the Draft EIR, "The site list for rezoning includes 72 properties totaling approximately 235.1 acres. The final list of sites to be rezoned is expected to ultimately contain fewer properties and acreage as the list is refined; however, this EIR will analyze all 72 sites to ensure adequate environmental review regardless of which properties ultimately compromise the refined list."

While the list of properties currently being considered by the Board of Supervisors (BOS) for rezoning has been refined from the original proposed list of 72 properties, the list of properties evaluated by the Draft EIR has remained consistent and covers all properties that were considered for potential rezoning. Analysis of all 72 sites in the Draft EIR provides for a conservative assessment of project impacts and is an appropriate approach for a program-level CEQA document.

The CEQA Guidelines provide: "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" (CEQA Guidelines, Section 15146). The section specifically notes that, "an EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance…should focus on the secondary effects that can be expected to follow from the adoption or amendment of a comprehensive zoning ordinance…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" (CEQA Guidelines, Section 15146[b]).

The Chapter 1, Introduction, of the Draft EIR discusses how a program-level analysis for the proposed project is appropriate because:

- Site-specific details, including development proposals or technical studies, are not available at this time;
- The General Plan Amendment, Housing Element, Zoning Text Amendment, and Rezone cover a defined geographic area, with similar land use characteristics; and
- A program-level analysis provides the County with the opportunity to consider "broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts" (CEQA Guidelines Section 15168(b)(4).

Regarding project alternatives, CEQA Guidelines 15126.6 states, "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." Furthermore, as noted in the Chapter 12, Alternatives, of the Draft EIR: "…the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained, while reducing the magnitude of, or avoiding, one or more of the significant impacts of the proposed project." Two alternatives in the Draft EIR analyzed scenarios with fewer sites. The governing body's decision to reduce the number of sites under consideration does not require a more targeted or focused CEQA analysis. The full analysis in the Draft EIR ensures that all sites have been adequately analyzed and discloses the full extent of potential impact, regardless of the composition the list ultimately takes.

Response to Comment 2-6

The Project Description has not changed between the Notice of Preparation (NOP) and the release of the Draft EIR; the project being analyzed in the Draft EIR includes the complete list of 72 properties.

The extent to which the County may use the analysis for future potential projects is addressed on page 3-21 of Chapter 3, Project Description, of the Draft EIR. The BOS directed staff to continue consideration of 19 of the 72 sites for the rezone program. Any future actions by the BOS to change the zoning of the balance of the sites beyond those 19 is speculative. However, development of any of the remaining sites that are not rezoned with this current action would be subject to existing entitlement processes for rezoning. In addition, any residential development analyzed by the Draft EIR but not chosen by the BOS for rezoning with this current action would be required to undergo an analysis to determine whether subsequent environmental analysis pursuant to CEQA Guidelines Section 15162 would be required.

Response to Comment 2-7

The Draft EIR is a program level EIR that conservatively discloses the maximum housing unit yield per property by multiplying the site acreage by 30 units per acre. This conservative approach was consistently applied for all properties analyzed in the Draft EIR and is appropriate for a program level environmental review.

For general information purposes relative to the Site Inventory (i.e., not the site analysis in the Draft EIR), two of the 19 sites that the BOS directed staff to continue considering for the rezone program are larger than 10 acres, including Rezone Site #34. The constraints analysis for Rezone Site #34 is consistent with the California Department of Housing and Community Development (HCD) guidance for large sites, which is a site greater than 10 acres. The HCD Sites Inventory Guidebook requires a further "large site analysis" for sites greater than 10 acres. However, if a site is less than 10 acres then a "large site analysis" is not required. For the purposes of the Site

Inventory, the County analyzed the development potential based on the Biological Resources Assessment prepared for the Draft EIR as well as County habitat mapping to determine the size of the resulting potential development area. The analysis shows that the potential development area is less than 10 acres and, therefore, a "large site analysis" was not prepared; HCD does not require such an analysis for all rezone sites.

Response to Comment 2-8

On February 28, 2024, the Airport Land Use Commission (ALUC) determined that the proposed project is consistent with the 2021 Airport Land Use Compatibility Plan (ALUCP), subject to the following conditions:

1. The proposed project is consistent with the ALUCP safety provisions provided rezone sites in Compatibility Zones C1 and C2 comply with ALUCP Policy 3.6.1. The portion of Rezone Site #43 within Compatibility Zone C1 would need to be developed as an alternative use, such as parking, open or public space. Residential would not be permitted in the portion of Rezone Site #43 in Compatibility Zone C1.
2. The project is consistent with ALUCP airspace protection provisions provided any structures, including construction cranes, do not exceed 150 feet in height, which would require an airspace review by the FAA.
3. The project is consistent with ALUCP overflight provisions provided residential projects in Compatibility Zones C1 and C2 require buyer awareness measures, including recorded Overflight Notifications.

If and when a development proposal is submitted to the County, staff would review the proposal for consistency with the ALUCP, including the above three conditions.

The February 28, 2024 determination by the ALUC that the proposed project is consistent with the 2021 ALUCP, including the ALUCP safety provisions, suggests that the Draft EIR's conclusion of less than significant impacts to aviation hazards is appropriate.

Response to Comment 2-9

The comment does not address the adequacy of the Draft EIR.

In response to the non-CEQA-related concerns expressed by the City of Auburn: concerns have been noted on all sites in the rezone program and these concerns have been conveyed to the BOS. On February 13, 2024, the BOS directed staff to continue consideration of 19 sites including six sites in the North Auburn community and within the City of Auburn Sphere of Influence. The BOS must balance these concerns with the needs of Placer County residents, appropriate land use practices, a desire to only rezone parcels with willing property owners and not force rezones, adherence to State law for rezone sites inventories, and compliance with the Board-adopted and State-certified 2021-2029 Housing Element. Many objections have been raised on many of the rezone sites and the ultimate decision of sites to be rezoned would be made by the BOS.

As noted above, the ALUC reviewed the sites within the Airport Compatibility Zones and determined that the only sites requiring further conditions are Rezone Sites #42 and #43, and all other sites are within Compatibility Zones which permit multifamily residential development.

The comment from the City of Auburn states that the requirements of ALUCP Policy 4.3.4(b) are intended for existing residentially zoned properties in the overflight zone. In review of this policy,

there is not a reference to the policy being limited to existing residential zoned parcels. The policy is called the "Placer County Infill Green Zone" and discusses criteria for infill development. The policy discusses conditions of approval for new multifamily and mixed-use residential projects. Furthermore, Rezone Sites #42 and #43 are zoned C2 "General Commercial" and multifamily residential development is an existing permissible use in the zone district.

Response to Comment 2-10

The comment does not address the adequacy of the EIR. The airport is an existing use. CEQA requires an analysis of project impacts on the environment, not the impact that an existing use may have on a future project. The ALUCP determined multifamily uses on Rezone Sites #42 and #43 are conditionally compatible with airport operations.

Response to Comment 2-11

The City has not proposed annexation nor are the rezone sites annexed into the city limits. Comments regarding annexation are speculative. The City has not updated its General Plan, and Rezone Site #34 is not within the City's jurisdiction.

Response to Comment 2-12

If a development proposal is submitted to the County for the Lincoln Way sites (Rezone Sites #71 and #72), transportation circulation including ingress and egress would be analyzed and a site-specific Traffic Impact Analysis would be required. To the extent improvements would be required, they would be a condition of approval for a future project. Because the proposed project does not include any site-specific development plans, the feasibility of the site access cannot be fully evaluated at this time. While the proposed sites are in the unincorporated County, the roadway itself is owned, operated, and maintained by the City of Auburn. If development is proposed on Rezone Sites #71 and/or #72, the proposed project would be reviewed in accordance with the City's roadway and encroachment standards. The project applicant would be required to provide engineering designs to meet these requirements. The project applicant would be required to obtain an encroachment permit from the City of Auburn in order to construct an access point on Lincoln Way. The sites are not within the City's jurisdiction and annexation is not currently proposed. Please see also Master Response 4 – Traffic Safety.

Response to Comment 2-13

As discussed on page 68 of the Initial Study prepared for the proposed project:

> "…pursuant to General Plan Policy 4.D.3, the project applicant of each future residential development project on the rezone sites would be required to provide written certification from the service provider that either existing services are available or needed improvements would be made prior to occupancy of the development. Compliance with General Plan Policy 4.D.3 would ensure that adequate capacity would be available to serve the projected demand generated by the future residential development of each rezone site, in addition to the County's existing commitments. To ensure compliance with General Plan Policy 4.D.3, future residential development projects would be required to comply with the following condition:
>
> > *As part of the Zoning Clearance application for multifamily development on the rezone sites, applicants shall provide written certification, such as a will-serve letter, from the service provider that either existing services are available or that improvements to the infrastructure must be made prior to occupancy of the development.*

Response to Comment 2-14

The City is not the only fire protection service provider or law enforcement provider. The California Department of Forestry and Fire Protection (CAL FIRE) has a station within 2.3 miles north of the site (Bowman Station 10 located at 13760 Lincoln Way), and the station would also provide emergency fire suppression in the event of a wildfire or structural fire. The Bowman Station 10 is the Operational Headquarters for the Placer County Fire Department and resources assigned to this station include two wildland fire trucks, one structure engine, one bulldozer, one fire helicopter, and one medical helicopter.

CAL FIRE also operates the Atwood Station 180 located at 11645 Atwood Road, and can provide services to properties in the Auburn area. A Placer County Sheriff's Office is located 6.5 miles northwest of the site and would also provide service to the site in the event of an emergency. These sites would not exclusively receive services from the City of Auburn.

Response to Comment 2-15

Analysis of the potential for exacerbation of wildfire risks is analyzed under Impact 10-3 in Chapter 10, Fire Protection and Wildfire, of the Draft EIR. As discussed therein, Rezone Sites #71 and #72 are located within a High Fire Hazard Severity Zone (FHSZ). Development on sites within a High FHSZ would be required to comply with Chapter 7A of the California Building Code including standards for ignition-resistant materials, fire-intrusion design of roofing and vents, and use of glazed exterior and windows. Development would also be subject to the provisions of PRC Section 4291 for defensible space. The Draft EIR notes that compliance with applicable regulations for development within or near high FHSZs, potential impacts would be less than significant.

Response to Comment 2-16

The comment is a closing statement and does not address the adequacy of the Draft EIR.

Letter 3

From: Tia Klumpp
To: Placer County Environmental Coordination Services
Cc: Christopher Pahule; Christopher Schmidt; Meghan Schwartz; Sean Rabe; Jonathan Wright; Tyghe Richardson; John Rogers; Ryan Kinnan; Gary Bell; Barry Miller
Subject: City of Auburn Comments on Draft EIR for the Placer County Housing Element Rezone Project
Date: Monday, March 18, 2024 3:31:05 PM
Attachments: City of Auburn Comments on Draft EIR_March 18 2024.pdf

Good Afternoon Placer County CDRA, Environmental Coordination Services:

The City appreciates the opportunity to provide comments (attached) on the Draft EIR for the Housing Element Rezone Project and look forward to continuing the discussion with County staff.

If you have any questions about our comment letter, please contact Jonathan Wright, Community and Economic Development Director, at jwright@auburn.ca.gov, or 530-823-4211.

3-1

Thank you,

Tia Klumpp
Senior Planner
City of Auburn | Building, Planning, & Public Works
1225 Lincoln Way | Auburn, CA 95603
(530) 823-4211 ext. 140 |tklumpp@auburn.ca.gov
www.auburn.ca.gov

CITY OF AUBURN
1225 LINCOLN WAY • AUBURN, CA 95603 • PHONE (530) 823-4211 • FAX (530) 885-5508

March 18, 2024

Placer County Community Development Resource Agency (CDRA)
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Subject: Comments on Draft EIR for the Placer County Housing Element Rezone Project

Dear CDRA Staff and Placer County Supervisors:

The City of Auburn (City) is submitting this letter to provide its comments on the Draft Environmental Impact Report (DEIR) for the Placer County Housing Element Rezone Project. The City appreciates the efforts of County staff and elected officials to be responsive to the City's concerns, as well as the County's efforts to comply with State housing mandates and meet the housing needs of its residents. We recognize that this task requires balancing competing objectives.

3-1 cont.

Context and Assumptions

The City has worked closely with Placer County CDRA to refine the list of sites to be rezoned. We expressed concerns with the initial list published in Fall 2023, which disproportionately relied on the unincorporated Auburn Sphere of Influence to meet the County's future housing needs. Many of these concerns are expressed in our comments on the Notice of Preparation (NOP) transmitted on November 20, 2023, and some will be reiterated in this comment letter.

Our review of the proposed zoning changes was facilitated by work sessions with Placer County CDRA staff on November 3 and December 12, 2023, and January 4 and February 16, 2024. At each meeting, we discussed our concerns with specific sites as well as the cumulative effects of the proposed rezoning on Auburn's municipal airport, circulation system, infrastructure, community services, and evacuation capacity. We also stressed and continue to stress the importance of working collaboratively with Placer County, since the City is in the process of updating its own General Plan at this time. Many of the sites evaluated in the DEIR are in the Auburn Planning Area and the City is actively working to determine their future land use designation. We appreciate that the County has been receptive to our input.

In our initial comments on the NOP, we noted that 45 percent of the 72 properties proposed for rezoning were located in the Auburn sphere of influence. The County estimated that these 42 sites could yield 3,138 housing units under their new zoning. We pointed out that North Auburn has 12 percent of the County's unincorporated area population but was being assigned 42 percent of the County's lower income housing capacity. As our November 20, 2023 letter stated, the median income in unincorporated North Auburn is already substantially below the County average, and further concentration of affordable units within this area could run counter to the countywide goal of affirmatively furthering fair housing.

Our November 20, 2023 letter also noted that Sites 71 and 72 (located at 85 Lincoln Way) were not among the sites originally considered in the County Housing Element and were late additions to the list. This concerned us not only because of the lack of prior community notification that these sites were being considered, but also because they should logically be annexed to the City prior to any change in use. The sites are adjacent to the City limits and urbanized parts of Auburn, rely on Auburn streets, and would be served by City sewer.

Based on our meetings with the County, it is our understanding that the list of sites under active consideration for rezoning has been reduced from 72 sites to 19 sites. A table provided to us by CDRA staff on February 16, 2024 indicated that the updated list includes six sites in the unincorporated Auburn sphere of influence, totaling 18.3 acres with an estimated capacity of 370 units. Unincorporated Auburn now represents 27 percent of the countywide rezone capacity, compared to the 42 percent proposed initially.

3-1 cont.

The City appreciates the reduction from 3,138 units to 370 units in its sphere of influence, as it substantially lessens potential impacts on Auburn. However, it does not eliminate impacts entirely and we continue to have concerns about some of the remaining sites. These are articulated in this letter, particularly with regard to the findings of the Draft EIR.

It is our understanding that the sites under active consideration in the unincorporated Auburn Sphere of Influence are as follows:

- Site 34 (Canal Street), 5.6 acres with the potential for 112 units
- Sites 42 and 43 (access via Graegle Ln), 3.7 acres, with the potential for 74 units
- Site 51 (Plaza Way at Willow Creek Dr), 1.8 acres, with the potential for 36 units
- Sites 71 and 72 (85 Lincoln Way), 7.2 acres, with the potential for 148 units

As these are the sites currently under consideration for rezoning, our comments focus on these properties. In the event the County restores sites in the Auburn sphere of influence to the list or "substitutes" new sites in the Auburn sphere not previously analyzed, we will have comments about the potential for additional impacts. We have included a global comment below that expresses general concerns about the disconnect between the "project" as described in the DEIR and the action that is now under consideration by the Board of Supervisors.

Specific Comments

1. The "Project" being evaluated in the Draft EIR is fundamentally different from the rezoning action now under consideration by the Board of Supervisors

We have an overarching concern about the DEIR, which is that evaluates a project that is substantially different from the rezoning proposal now under consideration by the Board of Supervisors. The DEIR considers the impacts of rezoning 72 scattered sites totaling 235.1 acres, consistent with the County's initial proposal presented in 2023. As defined in the DEIR Project Description, the project would create the capacity for 7,053 housing units, thereby closing a 1,257-unit deficit for high density (30 units/acre) housing sites required by the State of California to meet the County's Regional Housing Needs Allocation. Several alternatives are addressed in the DEIR, including two that assume a smaller number of sites and units.

As noted in the previous section of our letter, it is our understanding that the list of 72 sites has been reduced to 19 sites totaling 67.9 acres with an assumed capacity of 1,386 units. Additionally, the number of units and capacity of each site has been changed since the DEIR was prepared, with fewer units now being presumed on each site. The updated list of sites does not match either of the alternatives considered in the DEIR.

We recognize that the 19 sites now under consideration were among the 72 originally listed in the DEIR, and that the DEIR has evaluated the impacts of their rezoning (along with 53 other sites no longer under consideration). It might be argued that the DEIR therefore evaluates a "worst case scenario." However, the nature and extent of the impacts associated with the smaller list of sites and the lower buildout assumptions could result in different conclusions than the DEIR, making the document a flawed tool for the disclosure of potential impacts. The EIR should evaluate the smaller list of sites, thereby allowing for a more focused, nuanced, and ultimately more accurate assessment of the rezoning program, along with mitigation measures that align more closely with the sites actually being rezoned. Simply put, evaluating the impacts of rezoning 19 sites and 1,386 units requires a different analysis than evaluating 72 sites and 7,053 units.

3-1 cont.

We understand the County's time constraints and the urgency of its rezone project. We further recognize that these time constraints mean it may be infeasible to redo the EIR to only include the smaller list of sites. However, we request that at minimum the County revise its Project Description to explain the changes made between the Notice of Preparation and the adoption of the EIR, and the ways in which these changes may affect the findings, mitigation measures, and the expected level of CEQA clearance required for future projects. The Project Description should also address the extent to which the County may use this EIR to provide CEQA clearance for future zoning changes to the 53 sites that are *not* proposed for rezoning at this time. This could be a concern for the public, who are currently focusing comments on the 19 shortlisted sites.

2. The method for calculating the capacity of each site is inconsistent.

As we noted in our comments on the Notice of Preparation in November, 2023, the number of housing units on each site in the DEIR was estimated by multiplying the area of each site by 30 units per acre. Thus, Site 34 in Auburn, which is 12.8 acres, was estimated to have the capacity for 384 units. Sites 71 and 72 on Lincoln Way were estimated to have the capacity for 222 units. These assumed yields were used in the DEIR, but they do not reflect the estimates currently under consideration by the county.

The Draft zoning regulations for the County's new RM-30 High Density Zoning District indicate that the 30 unit/acre density applies only to developable areas on each site. It states that steep slopes, sensitive habitats such as wetlands, road easements, and similar uses are to be subtracted from when calculating the yield of a site. Because such a calculation was not provided in the DEIR, the true yield of the rezone sites is unknown. Again, the Draft EIR presumes a "worst case scenario" by counting all sites as 100 percent developable. The Final EIR should provide a more complete inventory of environmental resources on each site and a more precise accounting of potential dwelling units.

We understand that the County is now refining the developable area definitions on some of the sites to incorporate these considerations. For example, we note that the County's February 2024 rezoning proposal has reduced the area of Site 34 from 12.8 acres to 5.6 acres and the presumed yield from 384 units (30 units/acre) to 112 units (20 units/acre). Assumptions have been made about which portions of this site are undevelopable, indicating an additional level of suitability analysis has been performed for this site. This analysis is not discussed or disclosed in the DEIR, although it presumably reflects the presence of natural resources or site conditions such as slopes, wetlands, and easements—at least, on Site 34.

3-1 cont.

A similar level of analysis has not been provided for Sites 71 and 72, which also have constraints that could render portions of these sites undevelopable. Given the smaller number of sites now being considered for rezoning, a more accurate inventory of natural resources and estimate of the potential yield on each of the 19 "shortlisted" sites should be provided in the Final EIR.

3. **Multi-family residential development on Sites 42 and 43 would be inconsistent with the Airport Land Use Plan, present an aviation hazard that is not addressed by the DEIR, and create a potential constraint for operations at Auburn Municipal Airport.**

The City disagrees with the DEIR's conclusion that aviation hazard impacts are less than significant and therefore do not need to be addressed in the DEIR. Our response to the Notice of Preparation expressed our concern that 13 of the 72 sites were located in Land Use Compatibility zones around Auburn Municipal Airport. Upzoning of sites for high-density housing within the Airport Influence Area conflicts with the County's own policies, as expressed in its adopted Airport Land Use Compatibility Plan.[1] Upzoning is also inconsistent

[1] Policy 3.1.4 in the adopted Placer County Airport Land Use Compatibility Plan (2021) states that the compatibility of uses in Airport Influence Areas shall be preserved to the maximum feasible extent. It further states that conversion of land from commercial to residential uses within Compatibility Zone C1 should be "strongly discouraged", while actions in Zone C2 should be subject to "careful consideration of overflight impacts."

with Caltrans guidelines for airport land use planning, which urge "*careful consideration*" of potential overflight impacts when making land use changes around airports.[2]

The DEIR's finding that there is no potential for a significant aviation hazard impact indicates that "careful consideration" has not occurred. Our understanding is that amendments to an airport land use compatibility plan are usually sent to a qualified airport planning consultant for review prior to adoption. The ensures the consistency of the amendments with Federal Aviation Administration (FAA) regulations. There is no documentation of such a review in the DEIR.

We expressed particular concerns about sites #42 and #43, which the 2021 Placer County Housing Element describes as being in Airport Overflight Zones C1 and C2. The Housing Element itself indicated that restrictions on multi-family density apply on these sites and estimated a realistic capacity of only eight units. Site #51, in Zone C2, also remains on the County's shortlist of sites to be rezoned. Despite our earlier objection, these three sites remain on the list of sites now under consideration.

The DEIR Project Description acknowledges that Sites 42 and 43 are subject to Policy 4.3.4(b) of the Airport Land Use Compatibility (ALUC) Plan and would be subject to conditions of approval in the event residential development is proposed. Of the 72 sites evaluated in the DEIR, these are the only two sites subject to this limitation. Yet they remain on the County's shortlist of 19 sites to be rezoned. Policy 4.3.4(b) identifies design features to be included in the event an aircraft "strikes a building", as well as notification requirements for future occupants that they live in an overflight zone. These requirements are intended for existing residentially zoned properties in the overflight zone. They should not be used as justification to create even more residential zoning in the overflight zone. Given that sites 42 and 43 are currently zoned Commercial, that is exactly what is proposed here.

3-1 cont.

In addition to the increased aviation hazards associated with multi-family development in the overflight zone, the additional population density in this area could result in airport-related noise issues. The City regularly receives complaints about noise, and increasing population density in the overflight zones would likely lead to additional complaints. The DEIR concludes that because Sites 42 and 43 are outside the 55 dBA contour, there would be no aviation noise impacts. However, the ambient noise environment at these sites is already impacted by Highway 49 and noise from adjacent commercial businesses, and the cumulative effects of these sources and aviation noise could be significant.

We urge the county to remove Sites 42 and 43 from the list of sites under active consideration. We further urge that all sites in the airport flyover area be removed from future consideration for upzoning to higher residential densities. There are more suitable sites in unincorporated North Auburn that could be considered.

[2] Caltrans Division of Aeronautics. https://dot.ca.gov/programs/aeronautics/airport-land-use-planning

3-1 cont.

4. Development on the Lincoln Way sites (#71 and 72) and on the Canal Street site (Site 34) would have Land Use Planning impacts that should be addressed by the EIR.

As stated in our November 2023 comments on the NOP, we disagree with the DEIR's conclusion that the land use impacts of the project are "less than significant." County Sites 34, 71, and 72 are not only in the unincorporated Auburn sphere of influence, they are actually adjacent to the Auburn City limits. County Sites 64 and 73 (Edgewood Road) are also adjacent to the City limits, but our understanding is that these sites are no longer being considered for rezoning. Many of the other sites recently removed from the County's list of potential housing sites are also in areas under study by the City as part of its General Plan Update.

Sites 71 and 72 pose a particular concern for the City, as they are functionally part of a neighborhood that is located within the Auburn City limits. Although they are currently unincorporated, the sites effectively form a "notch" in the city boundaries and abut incorporated Auburn on both the east and west sides. This area will receive basic services, including sanitary sewer, from the City and should be annexed to the City prior to any development. The current County zoning on the site envisions single family housing at densities of 2-5 units per acre. The adopted Auburn General Plan supports this designation, as it reflects the land use context of the site, its topography, its proximity to other single family neighborhoods, and location near the State Recreation Area and the rim of the American River Canyon.

The City's land use strategy is to focus higher density housing and mixed use development in the Downtown/ Old Town areas, on underutilized commercial properties, near the train station, and in areas that are walkable, with access to urban services. Sites 71 and 72 do not meet any of these criteria. They are also not within the Highway 49 and Bowman "Green Means Go" zones, where higher densities are encouraged. Allowing high-density multifamily development on an undeveloped greenfield site with access constraints, steep terrain, and in a High Fire Hazard Severity Zone would be inconsistent with the City's land use policies. This creates a land use conflict that should be addressed by the Draft EIR.

Site 34, on Canal Street, presents a different set of land use policy conflicts. This site also adjoins the Auburn City limits but cannot be accessed from the City due to developed single family homes along its eastern property line. While the site is commercially zoned, its context is industrial, with land uses that include auto glass shops, auto detailers, electric motor repair, and truck repair shops. Multi-family development in this location should only be considered in the context of a comprehensive redevelopment plan that addresses land use compatibility, access and circulation improvements, and utilities.

Canal Street itself is substandard, and access to Site 34 is via a narrow "stem" easement that could not accommodate the number of units anticipated. While the City has not yet assigned a Land Use Map designation to Site 34 as part of its General Plan Update, redesignating this property from commercial uses to high-density housing would not be consistent with the City's land use policies. Thus, the inclusion of this site presents a conflict with local land use policy.



As noted in our previous comment, development on Sites 42, 43, and 51 would also have land use impacts. They create potential consistency issues with the Airport Land Use Compatibility Plan, in that each of these rezonings would intentionally increase the number of potential units within airport overflight zones. While the impacts of new housing on these sites would be incremental, such actions could ultimately affect operations at Auburn Municipal Airport and threaten its role as an economic driver and capital asset in Auburn.

5. **Development on the Lincoln Way sites (#71 and 72) would have potentially significant impacts on traffic safety and emergency access.**

CEQA requires that decision makers consider if a project will "substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections)" or result in "inadequate emergency access" due to narrow road width and limited access points. The Draft EIR concludes that potential impacts related to these criteria are "less than significant" because this is a program-level EIR and there are no site plans for any of the sites.

Sites 71 and 72 are, in fact, located on a sharp curve with limited sight lines and limited points of access to Lincoln Way. The 2-5 unit/acre density permitted by current County zoning reflects that constraint and limits the number of units that could conceivably be built to about 36. The proposed rezoning could allow up to 216 units on the property, a 500 percent increase. This would affect safety and could potentially affect emergency access. The DEIR concludes that existing Placer County policies would mitigate these hazards. However, this site is likely to require annexation by the City and should also be evaluated for its consistency with Auburn's standards and policies. Multifamily housing at 30 units per acre would not be compatible with these standards.

3-1 cont.

6. **Development on the Lincoln Way sites (#71 and 72), and potentially other sites under consideration, would impact utilities provided by the City of Auburn.**

The Draft EIR concludes that the rezoning project would have less than significant impacts on utilities, including sewer and storm drainage systems. We questioned that conclusion in our response to the Notice of Preparation, given that the project (as defined in the DEIR) would create the capacity for more than 3,000 additional housing units in the unincorporated Auburn sphere of influence, including sites that would receive utilities from the City. We appreciate the reduction in the number of sites now under consideration by the County, which would result in only 370 units in the Auburn sphere of influence. This will substantially reduce expected impacts.

Our comments here focus on Sites 71 and 72, as these sites are still under consideration for rezoning. The sites currently have no sewer service. The most cost-effective solution for providing service would be to extend City sewer mains from their current point of termination nearby. The City would seek to recover the cost from the developer, consistent with City policy. As discussed in previous sections, sewer service could not be provided without written

approval from LAFCo or after annexation is approved by LAFCo. The Draft EIR should consider the effects on City utilities as well as County utilities.

7. **Development on the Lincoln Way sites (#71 and 72), and potentially other sites under consideration, would impact public services provided by the City of Auburn.**

The Draft EIR concludes that the rezoning project would have less than significant impacts on public services, including police and fire services. We questioned that conclusion in our response to the Notice of Preparation, given that it did not consider potential impacts on City services. For example, the Draft EIR identifies the Placer County Sheriff's Office as the only potentially impacted law enforcement agency. Allowing more than 3,000 additional housing units in the unincorporated Auburn sphere of influence also would impact the Auburn Police Department.

In the case of Sites #71 and 72, there would be an increase in emergency service calls, an increase in traffic collisions, and increased staffing and equipment demands placed on the City. The DEIR indicates that such impacts would be offset by increased property taxes, but this would benefit the County rather than the City.

City fire protection needs also will be strained as a result of development on Sites 71 and 72. Page 10-35 of the Draft EIR notes that staffing and equipment are not considered CEQA impacts. However, Page 10-43 states that additional staffing and equipment will be required and will be funded by Fire Facilities Fees. The City would receive no fees for a project constructed in unincorporated Placer County. Again, this site should logically be annexed to the City as part of any development plan, with facility improvement funds provided to the City rather than the County. While the Auburn Fire Department supports and participates in the concept of "closest resources" as a fire response strategy, the EIR should not presume automatic mutual aid as a way to mitigate potential impacts.

3-1 cont.

8. **Development on the Lincoln Way sites (#71 and 72) have potential wildfire-related impacts that should be addressed.**

Again, our comments focus on Sites 71 and 72, since they remain on the "shortlist" of sites under consideration for rezoning. It is worth noting that several other sites covered by this EIR are located in portions of the unincorporated Auburn sphere of influence with wildfire hazard risks. While these other sites have been removed from the County's shortlist, any attempt to use this EIR to provide CEQA clearance for their future rezoning would be a concern for the City.

Sites 71 and 72 are located in a *High* Fire Hazard Severity Zone area and abut a *Very High* Fire Hazard Severity Zone. Rezoning these sites to allow a 500 percent increase in the number of potential units (from 36 to 216) would increase wildfire risks, as well as the number of households that are exposed to these risks. It would make evacuation more difficult, given potentially vulnerable populations residing in new multi-family development, constrained access to Lincoln Way, and the limited capacity and narrow width of Lincoln Way. Increasing

3-1 cont.

the population along the rim of the American River Canyon raises concerns about elevated wildfire ignition risks in and around Auburn. These risks should be assessed in the DEIR.

Conclusion

The City appreciates the opportunity to provide these comments and hopes the County will consider them as it prepare the Final EIR. We wish to particularly thank Chris Pahule and Chris Schmidt for their responsiveness to the City's concerns. We look forward to a continued collaborative relationship with County staff as we continue our respective General Plan Updates and participate in the North Auburn Bowman Community Plan Update.

If you have any questions about our comment letter, please contact Jonathan Wright, Community and Economic Development Director, at jwright@auburn.ca.gov, or 530-823-4211.

Sincerely,

Sean Rabé

Sean Rabé
City Manager

LETTER 3: SEAN RABE, CITY OF AUBURN

Response to Comment 3-1

Please see Responses to Comment Letter 2.

Letter 4

From: James Ferguson
To: Placer County Environmental Coordination Services; Kally Kedinger-Cecil
Subject: Placer County Housing Element Sites Rezone DEIR Comment
Date: Monday, March 18, 2024 12:07:51 PM
Attachments: DCJESD DEIR Letter - Placer Rezoning 031824.pdf

4-1 Good Afternoon-
I am submitting the attached letter on behalf of the Dry Creek Joint Elementary School District to submit comments regarding the Draft Environmental Impact Report for the Housing Element Sites Rezone Project. Should you have any questions or need additional clarification regarding the letter, please contact my office via responding to this email or calling 916-770-8800.
Sincerely,

photo

Jim Ferguson
Assistant Superintendent, Administrative Services
Dry Creek Creek Joint Elementary School District

916-770-8800 | www.drycreekschools.us | jferguson@dciesd.us
8849 Cook Riolo Rd., Roseville, CA 95747

DRY CREEK JOINT ELEMENTARY SCHOOL DISTRICT CONFIDENTIALITY NOTICE: This transmission, including any attachments, is confidential and may contain information that is privileged, confidential or exempt from disclosure by law. If you are not the intended recipient, or their agent, you are hereby notified that reading, disclosing, copying, distributing or using any information contained in this transmission is strictly prohibited. If you have received this transmission in error, please immediately notify us by e-mail or by telephone at (916)-770-8800 and destroy the transmission.

Dry Creek Joint Elementary School District

8849 Cook Riolo Road
Roseville, California 95747
Phone (916) 770-8800 | Fax (916) 771-0650

"Excellence in Education Since 1876"

Superintendent
Brad Tooker, Ed.D

Board Members
Jon Fenske
Scott Otsuka
Jean Pagnone
Jeff Randall
Jason Walker

March 18, 2024

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

Re: Response of Dry Creek Joint Elementary School District to "Draft Environmental Impact Report for the Placer County Housing Element Sites Rezone Project"

Dear Ms. Kedinger-Cecil:

4-2 On behalf of the Dry Creek Joint Elementary School District ("District"), we provide this letter to submit comments regarding the Draft Environmental Impact Report ("DEIR") for the Housing Element Sites Rezone Project ("Project") proposed by the County of Placer ("County"). According to the DEIR, the Project would implement Program HE-1 of the Placer County Housing Element. Program HE1 is a rezoning program to accommodate the need for low and very-low-income households as required by the State's Regional Housing Needs Assessment ("RHNA") allocation for the County. The County is creating a new zoning district called Residential Multifamily 30 ("RM30") to plan for potential sites to accommodate the RHNA calculations. The RM30 zone prescribes a minimum density of 20 units per acre and a maximum density of 30 units per acre. The site list for rezoning is comprised of 72 properties dispersed throughout unincorporated Placer County and totaling approximately 235.1 acres.

4-3 As a threshold issue, the District is sparsely mentioned in the DEIR. There is no mention of the District or the linkages between housing development, their impact on the District, and the need for infrastructure to support the community's students. As a general note, the District requests additional discussion of these topics be included in the Housing Element and particularly in the policies set forth therein. Specifically, two of the sites listed, Site Number 9 and 10, are located immediately adjacent to the Creekview Ranch School ("Creekview") located at 8779 Cook Riolo Road, Roseville, CA 95747. Combined, Sites 9 and 10 would be evaluated for a minimum of ninety-two and a maximum of one hundred and thirty-eight potential residential units based on the RM30 calculation. However, there is no calculation provided as to how many residents would result from this increase and the strain this would place on the District.

4-4 Furthermore, the Housing Accountability Act prohibits local planning agencies from denying a residential project (or approving it at a reduced density) if the project complies with all applicable objective standards. (Gov. Code § 65589.5(j).) The County cannot impose any condition on such a project if the condition makes the project infeasible, financially or

physically. These objective standards are set out in the general plan and zoning documents approved by local planning agencies. As such, once the Housing Element is approved, the District will no longer have an avenue to ensure that the impact of high-density residential units on schools is adequately identified, analyzed, addressed, and mitigated. This is also explicitly acknowledged in the DEIR, which states,

4-4 Cont.

> "The County intends to use the streamlining/tiering provisions of the California Environmental Quality Act ("CEQA") to the maximum feasible extent, so that future environmental review of specific projects can rely when appropriate on this EIR without the need for repetition and redundancy Specifically, pursuant to CEQA Guidelines Section 15183, streamlined environmental review is allowed for projects that are consistent with the development density established by zoning, community plan, specific plan, or general plan policies for which an EIR was certified, unless such a project would have environmental impacts peculiar or unique to the project or project site. Likewise, PRC Section 21094.5 and CEQA Guidelines Section 15183.3 also provide for streamlining certain qualified, infill projects."

(DEIR at 1-3 and 4.)

Therefore, through this letter, the District wishes to emphasize that this Project has the potential to have a profound negative effect on the District's students, their families, and residents who will reside in and near Sites 9 and 10 of the Project. Overall, the DEIR fails to present any information needed to assess the Project's environmental impacts on the District, specifically Creekview.

4-5

With the foregoing in mind, the District requests the County revise the DEIR to address the serious deficiencies identified in this letter, develop appropriate mitigation measures for impacts that are identified as significant, and then recirculate the revised DEIR as required by CEQA. (CEQA Guidelines § 15088.5.) The District is hopeful that collaboration with the County, as outlined in this letter, will yield meaningful solutions that alleviate the impacts caused by the Project. The District is prepared to provide information as necessary to assist the County in addressing each of the District's concerns regarding the proposed Project.

I. The DEIR does not meet its purpose as an informational document because it fails to provide an adequate description of the environmental setting related to schools.

4-6

One of CEQA's basic purposes is to inform government decision-makers and the public about the potential significant environmental effects of proposed projects and to disclose to the public the reasons for approval of a project that may have significant environmental effects. (CEQA Guidelines § 15002(a)(1) and (a)(4).) In line with this goal, the preparer of an EIR must make a genuine effort to obtain and disseminate information necessary to the understanding of the impacts of project implementation. (See, CEQA Guidelines § 15151; *Sierra Club v. State Board of Forestry* (1994) 7 Cal.4th 1215, 1236.)

An EIR must describe existing environmental conditions in the vicinity of the proposed project from a local and regional perspective, which is referred to as the "environmental setting." (CEQA Guidelines § 15125.) This description of existing environmental conditions serves as the

4-6 Cont.

"baseline" for measuring the qualitative and quantitative changes to the environment that will result from the project and for determining whether those environmental effects are significant. (*Id.*; see also, CEQA Guidelines § 15126.2(a); *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 C4th 439, 447.)

4-7

District facilities are a critical part to the Project location's environment and should be considered throughout the DEIR impact categories. As noted, Sites 9 and 10 of the Project are located directly across the street from a District school, Creekview Ranch School. According to the District's School Facilities Master Plan, adopted February 9, 2023, student enrollment at Creekview is projected to continue to increase as new development occurs, with the School anticipated to exceed available capacity in the 2026-27 school year. This is based on anticipated students from new development apart from this Project. As of February 2023, an additional five classrooms would need to be added by 2026-27 to account for already scheduled development. This figure does not reflect the massive influx of new students that would likely result from the residential units that may be built as a result of the Project. The District is inadequately equipped to house these excess students.

4-8

Furthermore, and as explicitly stated in the DEIR, it is common practice for cities and counties to rely on program-level environmental documents to excuse further analysis at the project-level. (See *Citizens for Responsible Equitable Environmental Development v. City of San Diego Redevelopment Agency* (2005) 134 Cal.App.4th 598, 608.) Applied to this instance, the County would be able to approve further project-specific entitlements without informing the public regarding the impact of such specific projects on school facilities. Therefore, the County must do the work of identifying and analyzing these impacts in this DEIR to ensure that the document complies with the basic principles of CEQA.

4-9

The DEIR purports to describe the Project's environmental setting in each of the seven environmental impact categories that are analyzed in the DEIR. However, in doing so, the DEIR barely mentions the District or the Creekview school throughout the entire document. The DEIR fails to present any information needed to assess the Project's environmental impacts on the District or Creekview. For instance, the DEIR fails to address the current and projected future enrollment at Creekview or any other District schools that will be affected by the Project; the District's educational program objectives at Creekview; a description of how the District currently uses its facilities at Creekview; and the current vehicular and pedestrian paths of travel used by District staff, students and their families to get to and from this school. Without consideration of these factors, it is impossible for the lead agency and public to assess whether the Project has any impacts on the District's students, families, and staff, and whether those impacts are significant.

II. The DEIR fails to identify and analyze all impacts on school facilities.

4-10

The DEIR does not address student generation within the context of the overall growth within the County and its impact on enrollment and potential overcrowding of school sites. The District requests the County consider the cumulative impacts of the Project alongside other new developments within the County, related to student generation, the facilities needed to

accommodate such growth, and all the impacts on the District, direct and indirect, resulting from the Project.

CEQA Guidelines, Appendix G, states that a project may have public services impacts on schools if the project would "result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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" for the provision of school services.

There is a myriad of ways in which large residential and commercial development projects can impact a school district's need for new or physically altered facilities in order to maintain performance objectives. The DEIR does not and should analyze all potential impacts under this standard, including but not limited to: (1) whether the influx of students would require "physically altered" school facilities unrelated to the accommodation of additional enrollment; (2) whether other impacts of the proposed Project, such as increased traffic, noise, or air pollutants in the neighborhood, could impact the District's need for new or physically altered school facilities; and (3) whether other impacts of the proposed Project could otherwise interfere with the District's ability to accomplish its own performance objectives. Consideration of the above-listed categories information is essential to properly making these determinations.

4-10
Cont.

Lead agencies often cite to SB 50 (specifically, Government Code sections 65995(h) and 65996(a)), for the proposition that the payment of school impact fees (commonly referred to as "developer fees") excuses them from their obligations to analyze and mitigate impacts posed on school districts by development. In addition, the relevant text in the DEIR is a misstatement of the law related to developer fees and CEQA. While SB 50 does declare that the payment of the developer fees authorized by Education Code section 17620 constitutes "full and complete mitigation of the impacts of any legislative or adjudicative act on the provision of adequate school facilities," (Gov. Code § 65995(h)), SB 50 does not excuse lead agencies from analyzing such impacts on school facilities in the first place. Further, California courts have since acknowledged that developer fees do not constitute full and complete mitigation for school-related impacts other than school overcrowding. (*Chawanakee Unified Sch. Dist. v. Cty. of Madera* (2011) 196 Cal.App.4th 1016.) Thus, the payment of fees does not constitute full mitigation for all impacts caused by development related to traffic, noise, biological, pedestrian safety, and all other types of impacts related to the District and its educational program. The District expects the County to analyze and mitigate all such impacts for this Project.

From a practical standpoint, the amount of developer fees received by school districts typically falls woefully short of alleviating the impacts caused by development. This is due largely to the fact that: (1) statutory developer fee amounts fail to acknowledge the differences in costs of school construction from one district to another; (2) the developer fee amounts fail to contemplate the special facilities needs of those districts experiencing rapid growth, such as the need for portables; and (3) the adjustment formula for developer fees is based on a "construction cost index" and does not include indexing related to the increases in land costs, resulting in the actual costs of facilities (i.e., land and improvements) increasing at a greater rate than the adjustment.



The inadequacy of developer fees as a source of funding for school facilities has forced school districts to rely increasingly on other sources of funding, primarily including local bond funds and State bond funds administered under the School Facilities Program ("SFP"). However, these sources of funds can be equally unreliable. Local bond funds are also difficult to generate, as local bonds are subject to district bonding capacity limitations and voter approval. Either way, the funding formula was never intended to require the State and local taxpayers to shoulder a disproportionate portion of the cost of school facilities.

4-10 Cont.

In addition to the fact that current school sites do not have sufficient space to accommodate additional students, an inadequate infrastructure – which might include cafeterias, restroom facilities, sewerage, electrical capacity, and the like – may also preclude any additional growth. Placing too great a strain on the infrastructure is itself a physical impact to be addressed in an EIR.

Thus, the payment of fees does not constitute full mitigation for all impacts caused by development related to traffic, noise, biological, pedestrian safety, and all other types of impacts related to the District and its educational program. The District expects the County to analyze and mitigate all such impacts for this Project.

III. The DEIR fails to identify and analyze all impacts on housing.

The DEIR should estimate the amount of development fees to be generated by development in accordance with implementation of the Project and should describe the phasing of residential and development over time from inception to build-out of the Project.

The timing of development will also determine when new students are expected to be generated, and therefore is an important consideration particularly when considering the cumulative impact of a project in conjunction with other approved or pending development. High-density residential units, such as multi-family housing, have a proportionally larger impact on the District when compared to single family homes. This is because multi-family units generate a similar number of students to single family units but over a smaller square footage. Therefore, the developer fees collected on such multi-family housing do not accurately reflect the burden placed on the District to ensure adequate facilities are ready to house the students generated by development. Therefore, significant multi-family residential development often leads to a scenario where the developer fees imposed on such development does not track with the need for facilities to house students generated by such development.

4-11

While the foregoing funding considerations raise fiscal issues, they translate directly into physical and environmental impacts, in that inadequate funding for new school construction results in overcrowding of existing facilities. Furthermore, fiscal and social considerations are relevant to an EIR, particularly when they either contribute to or result from physical impacts. (Pub. Resources Code § 21001(g); 14 Cal. Code Regs. §§ 15021(b), 15131(a)-(c), 15142 & 15382.)

IV. The County Must Consider All Traffic and Related Impacts, Including Impacts on Traffic on Student Safety, Caused by the Project.

The DEIR was required to address potential effects related to traffic, including noise, air quality, and any other issues affecting schools. (Pub. Resources Code, §§ 21000, et seq.; Cal. Code Regs., tit. 14, §§ 15000, et seq.; *Chawanakee Unified School District v. County of Madera, et al.*, (2011) 196 Cal.App.4th 1016.) Additionally, specifically related to traffic, the DEIR was required to analyze safety issues related to traffic impacts, such as reduced pedestrian safety, particularly as to students walking or bicycling to and from Creekview; potentially reduced response times for emergency services and first responders traveling to these schools; and increased potential for accidents due to gridlock during school drop-off and pick up hours. Though the DEIR generally analyzes the traffic impacts anticipated by the Project, its analysis is inadequate, particularly in relation to schools. Traffic issues are a particular concern for school districts in that increased traffic volume may interfere with established school bus routes, require new and additional routes, and may increase safety concerns for students walking or riding bicycles or other modes of transportation to and from school.

Any environmental analysis related to the Project must address potential effects related to traffic, noise, air quality, and other issues affecting schools. (Pub. Resources Code, §§ 2100, et seq.; Cal. Code Regs., tit. 14 §§ 15000, et seq.; *Chawanakee Unified School District v. County of Madera, et al.*, (2011) 196 Cal.App.4th 1016.) Specifically related to traffic, there must be an analysis of safety issues, such as reduced pedestrian safety; potentially reduced response times for emergency services and first responders traveling to these schools; and increased potential for accidents due to gridlock during school drop-off and pick-up hours. (See, Journal of Planning Education and Research, "Planning for Safe Schools: Impacts of School Siting and Surrounding Environments on Traffic Safety," November 2015, Chia-Yuan Yu and Xuemei Zhu, pg. 8 [Study of traffic accidents near Austin, Texas schools found that "[a higher percentage of commercial uses was associated with more motorist and pedestrian crashes" around schools].)

4-12

The State Office of Planning and Research has developed new CEQA Guidelines that sets forth new criteria for the assessment of traffic impacts and now encourages the use of metrics such as vehicle miles traveled ("VMT"), rather than level-of-service ("LOS"), to analyze project impacts on traffic. (14 Cal. Code Regs. §15064.3.) However, local agencies may still consider impacts on traffic congestion at intersections where appropriate and must do so where, as here, such traffic congestion will cause significant impacts on air quality, noise, and safety issues caused by traffic. (Pub. Res. Code § 21099(b)(3).)

To the extent the Project may implement construction that impedes circulation in the County, and clog the access roads to, from, and around the District campuses, such items should be addressed in the EIR. (See, 5 Cal. Code Regs. § 14010(k), which requires that school facilities be easily accessible from arterial roads.)

In addition to increased risks of vehicular accidents, the traffic and parking impacts posed by the Project may impact the safety and convenience of students who walk or bike to school. Title 5 of the California Code of Regulations requires that school sites be located within a proposed attendance area that encourages student walking and avoids extensive bussing. (5 Cal. Code Regs.

§ 10410(1).) As per the District Board Policy 5142.2, the District is committed to reducing vehicle emissions by encouraging students to walk or bicycle to school or to use district or public transportation. It is important that these traffic impacts are not only assessed through a VMT analysis, but also through a LOS analysis, as traffic congestion that may result from the Project may cause significant issues related to safety, noise, and air quality.

The requirement to analyze student safety issues is rooted in both the California Constitution and CEQA. Article I, section 28(c), of the California Constitution states that all students and staff of primary, elementary, junior high, and senior high schools have the inalienable right to attend campuses that are "safe, secure, and peaceful." CEQA is rooted in the premise that "the maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern." (Pub. Res. Code § 21000(a).) Naturally, safety is crucial in the maintenance of a quality environment. "The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached." (Pub. Res. Code § 21000(d).) The Legislature has made clear in declarations accompanying CEQA's enactment that public health and safety are of great importance in the statutory scheme. (Pub. Res. Code §§ 21000 (b), (c), (d), (g); 21001(b), (d) (emphasizing the need to provide for the public's welfare, health, safety, enjoyment, and living environment.) (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 386.)

4-12 Cont.

The District notes that no mention is made in the DEIR regarding travel-to-school analysis, including school bus routes, or walking/riding paths or routes. The District requests these school-related transportation, traffic, and safety impacts be analyzed and addressed, including those resulting from traffic and transportation impacts from the Project as a whole, and those school impacts relating to both (1) Project resident students' travel to and from yet-to-be identified school sites, and (2) congestion and related impacts on Creekview school's pick-up and drop-off procedures in light of increased traffic on major and arterial roads outside the Project. As mentioned, Creekview school is currently nearing capacity and will not support the Project's full population. As a result, students residing in the Project will likely need to travel from the Project to interim or new alternative school sites, which necessitates analysis of contingency bus and home to school travel routes to same. Furthermore, as per the District's BP/AR 3541 students are only eligible for bussing if they live more than 2 miles from their designated campus. Due to the location of the rezoned areas, and their nature as high-density residential, it is more than likely that the developments in the re-zoned areas will generate a proportionally large number of students that will not be eligible for bussing and, therefore will have to walk to school on a road that will be significantly busier due to the traffic generated by development.

The DEIR fails to provide a sufficient and adequate analysis of the environmental impacts the Project will have related to Cook Riolo Road, which would otherwise run along the east side of Project Sites 9 and 10 and is the only main road that serves the Creekview school. Cook Riolo Road is a shared-use path, and is a two-lane, north-south collector road that transitions to Woodcreek Oaks Boulevard in the City of Roseville to the north. The proposed project does not include any site-specific development plans, designs, or proposals at this time regarding this

road. The District anticipates that the construction and operation of the proposed Project will have significant impacts on traffic, transportation, circulation, and student safety.

The DEIR is inadequate in its discussion of the significant and inevitable traffic and transportation impacts, particularly as related to the Project's construction. The construction of, and traffic generated by, the Project will severely exacerbate the existing inadequacies in the County's roadways/sidewalks and the safety issues posed thereby. These impacts will severely inhibit the District's ability to operate its educational programs, including at the Creekview school. However, none of these issues were properly analyzed in the DEIR.

4-12 Cont.

The foregoing categories of information are critical for determining the extent of both physical and fiscal impacts on the District caused by increased population growth.

V. The County Must Consider Social Impacts Caused by the Project.

The Final EIR should identify how school facilities are currently utilized as civic centers, and are projected to serve in that capacity in the future, and assess the impacts of the Project on that use and identify how the District's grounds are currently utilized for recreation (parks) and open space, and are projected to serve in that capacity in the future, and assess the impacts of the Project on that use. These two requests are made in light of school districts' roles in providing recreational space and civic centers to the community. As overcrowding increases at school sites, the community's ability to utilize school facilities becomes limited, which has both physical and social impacts on the community. For example, the addition of relocatable classrooms to house new students may reduce available playing fields or recreational space. Similarly, moving schools to alternative class schedules, or having to set aside additional space for new alternative education students, may interfere with the community's ability to gain access to school facilities for civic use.

4-13

VI. Conclusion

The District is prepared to provide any information necessary to assist the County in preparation of the final EIR and in addressing each of the issues set forth above. The District is committed to working with the County and any developers to ensure that the District's needs are met and that development located in the area of the proposed Project, as well as all of the residents of the community, can receive adequate and appropriate educational facilities.

Importantly, the District's comments and suggestions provided herein should be read as primarily focused on those impacts that go beyond the Project's direct impact on the need for school facilities to house the Project's students. While the direct impact may be statutorily mitigated, it should still be analyzed and discussed. And, importantly, the direct impact is not the only school-related impact foreseeably caused by the Project. Other environmental impacts which have an effect on school services, including those related to traffic and transportation,

4-14

4-14 Cont.

including travel to school routes and bus stops and routes, noise and air quality, pedestrian and alternative travel safety and convenience, infrastructure impacts, and all other types of impacts related to school services and school-related community concerns, all of which are important to the District's mission. Therefore, the District respectfully requests that the final EIR, include a discussion, analysis, and mitigation of all such impacts.

Please feel free to contact me directly if we can be of any assistance.

Sincerely,

Dr. Brad Tooker
Superintendent
Dry Creek Joint Elementary School District

LETTER 4: BRAD TOOKER, DRY CREEK JOINT ELEMENTARY SCHOOL DISTRICT

Response to Comment 4-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 4-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 4-3
Please see Master Response 5 – Programmatic vs. Site-Specific EIR.

Response to Comment 4-4
The County does intend to use the streamlining/tiering provisions of CEQA. However, additional opportunities for public input, including input from potentially affected agencies or other governmental bodies such as a school district, would be available during the design review process for potential projects. Future residential projects on the rezone sites would also be subject to a Subsequent Conformity Review, and if the review determined that a proposed project would result in more severe impacts than previously identified, further CEQA analysis would be required. In such an instance, the Dry Creek Joint Elementary School District (DCJESD) would have further opportunity to review a development proposal.

Response to Comment 4-5
The comment states the rezone project would have a "profound negative effect on the District's students, their families, and residents who will reside in and near Sites 9 and 10 of the Project." The comment letter does not provide sufficient detail to arrive at this conclusion, and does not include specific examples of how the project would negatively impact the DCJESD's ability to continue to serve the Dry Creek community.

Response to Comment 4-6
The comment letter does not specifically identify how the environmental setting is inadequate as it relates to schools.

Response to Comment 4-7
Please see Master Response 6 – Impacts to Local Schools.

Response to Comment 4-8
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 4-9
Please see Master Response 5 – Programmatic vs. Site-Specific EIR.

Response to Comment 4-10
The Draft EIR acknowledges on page 1-15 in Chapter 1, Introduction, that future residential development would result in an increase in the overall student population in the County, and such an increase in population would result in an increased demand on schools. The Draft EIR further notes that each residential development would be subject to payment of applicable school impact

fees to fund necessary facility improvements. Please see also Master Response 6 – Impacts to Local Schools.

Impacts to the non-school environment (i.e., traffic, air quality, noise generated from construction activities, public infrastructure, biological impacts, etc.), including cumulative impacts, are analyzed in the Draft EIR. Projects would be required to adhere to mitigation measures to reduce the severity of impacts. The comment letter does not explain how the Draft EIR's analysis with regards to the non-school environment is inadequate. The DCJESD sets developer impact fees, not the County. Lastly, the adequacy of school impact fees is not an issue to be addressed under CEQA.

Response to Comment 4-11

Active development proposals are not currently proposed for the rezone sites in District 1, and, therefore, the timing of future development is currently unknown. Please see Master Response 6 – Impacts to Local Schools.

Response to Comment 4-12

Please see Master Response 4 – Traffic Safety.

Response to Comment 4-13

Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 4-14

The statement is a closing summary of the letter, which the above responses have addressed.

Letter 5

From: David Melko
To: Placer County Environmental Coordination Services
Cc: Kally Kedinger-Cecil; Rick Carter
Subject: Housing Element Sites Rezone (PLN22-00476) Draft EIR - ALUC Comments/Corrections
Date: Monday, February 12, 2024 2:11:01 PM
Attachments: image001.png
image002.png
image003.png
image004.png

Environmental Coordinator:

Please note the following ALUC comments/corrections to the Housing Element Sites Rezone (PLN22-00476) Draft EIR:

Chapter 1 – Introduction, Hazards and Hazardous Materials (1st paragraph on Page 1-11)

5-1

All rezone sites within airport influence areas, with the exception of ~~Site #42~~ and Site #43, are located in airport land use zones that allow development of multi-family residential development as a compatible use. However, with regard to ~~Sites #42~~ and #43, ~~compliance with conditions 1 through 3 of the Placer County Airport Land Use Compatibility Plan (PCALUCP) Policy 4.3.4(b) would be required as conditions of approval to ensure development within Sites #42 and #43 is compatible with the airport land use zone in which the sites are located.~~ Site #43 **is split between Compatibility Zones C1 (one-third) and Zone C2 (two-thirds). Zone C1 does not permit multi-family development as a compatible use. The portion of Site #43 within Zone C1 would need to be developed as a lower density residential, such as single-family residential, short-term lodging, or an alternative use, such as parking, open or public space.**

Comments/Corrections:

5-2 • Site #42 borders Compatibility Zone C1. Site #42 is located in Compatibility Zone C2. Multi-family residential is a compatible use.

5-3 • Site #43 is split between Compatibility Zones C1 (one-third) and Zone C2 (two-thirds). Zone C1 does not permit multi-family development as compatible use. The portion of Site #43 within Zone C1 would need to be developed as a lower density residential, such as single-family residential, short-term lodging, or an alternative use, such as parking, open or public space.

5-4 • ALUCP Policy 4.3.4(b) is not applicable to Sites #42 and #43. ALUCP Policy 4.3.4 and subsections only apply to parcels in Auburn Municipal ALUCP "Infill Green Zones." Neither Sites #42 nor #43 are in the Infill Green Zones. The citation is incorrect.

5-5 • All the rezone sites in Auburn Municipal ALUCP Zones C1 and C2 will require compliance with ALUCP Policy 3.6.1"Recorded Overflight Notification." Policy 3.6.1 will be required as a condition of approval for any residential development in these compatibility zones.

Chapter 7 – Noise, Impact 7-4 (Page 7-28)

5-6

Three airports are located within Placer County: the Lincoln Regional Airport, the Auburn Municipal Airport, and the Blue Canyon-Nyack Airport. Of the 72 rezone sites, none are located within the Lincoln Regional Airport or Blue Canyon-Nyack Airport influence areas. However, ~~12~~ **11** of the proposed rezone sites are located entirely within the Auburn Municipal Airport influence area (Sites #35, #36, #42, ~~#43~~, #51, #56, #57, #61, #65, #66, #70, and #74), and one rezone site (Site #58) is located partially within the Auburn Municipal Airport influence area. **Site #43 is split between Zones C1 (one-third) and Zone C2 (two-thirds).** It should also be noted that while the Truckee Tahoe Airport is not located within Placer County, a portion of the airport's overflight zone is within the County boundaries. As a result, one of the proposed rezone sites (Site #44) is located within the Truckee Tahoe Airport influence area.

Chapter 7 – Noise, Impact 7-4 (Page 7-31)

5-7

Therefore, exterior noise levels would comply with the Placer County 60 dBA Ldn exterior noise standard for rezone sites located closest to local airports. Additionally, it should be noted that the Placer County Airport Land Use Compatibility Plan (PCALUCP) ~~includes~~ **requires** buyer awareness measures including Recorded Overflight Notifications for projects within ~~overflight zones~~ **Compatibility Zones C1 and C2**. An overflight notification informs property owners that the property is subject to aircraft overflight and generation of noise. Overflight notifications are generally appropriate in areas outside the 60 dB CNEL noise contour. 4

5-8

Comment/Corrrection:

- All the rezone sites in Zones C1 and C2 will require compliance with ALUCP Policy 3.6.1"Recorded Overflight Notification." Policy 3.6.1 will be required as a condition of approval.

Thank you for the opportunity to provide comments on the Draft EIR. Should there be any questions regarding our comments, please let me know.

David M. Melko
Senior Transportation Planner
Placer County Transportation Planning Agency
2260 Douglas Blvd., Suite 130, Roseville, CA 95661
Office (530) 823-4090
website | vCard | email

LETTER 5: DAVID MELKO, PLACER COUNTY AIRPORT LAND USE COMMISSION

Response to Comment 5-1

In response to the comment, page 1-11 of Chapter 1, Introduction, of the Draft EIR is hereby revised, as follows:

> Three airports are located within Placer County including the Lincoln Regional Airport, the Auburn Municipal Airport, and the Blue Canyon-Nyack Airport. Of all the rezone sites, none are located within the Lincoln Regional Airport or Blue Canyon-Nyack Airport influence areas. However, ~~12~~ 11 of the proposed rezone sites are located entirely within the Auburn Municipal Airport influence area (Sites #35, #36, #42, ~~#43,~~ #51, #56, #57, #61, #65, #66, #70, and #74), and one rezone site (Site #58) is located partially within the Airport influence area. In addition, while the Truckee Tahoe Airport is not located within Placer County, a portion of the Airport's overflight zone is within the County boundaries, and, as a result, one of the proposed rezone sites (Site #44) is located within the Truckee Tahoe Airport influence area. All rezone sites within airport influence areas, with the exception of ~~Site #42 and~~ Site #43, are located in airport land use zones that allow development of multi-family residential development as a compatible use. However, according to the Placer County Airport Land Use Compatibility Plan (PCALUCP), ~~with regard to~~ Sites ~~#42 and~~ #43 is split between Compatibility Zone C1 and Zone C2. Zone C1 does not permit multi-family development as a compatible use. As such, the portion of Site #43 that is within Zone C1, approximately one-third of the site, would be required to be developed as a lower density residential use, such as single-family residential or short-term lodging, or as an alternative use, such as parking, open space, or public space.~~, compliance with conditions 1 through 3 of the Placer County Airport Land Use Compatibility Plan (PCALUCP) Policy 4.3.4(b) would be required as conditions of approval to ensure development within Sites #42 and #43 is compatible with the airport land use zone in which the sites are located~~. Therefore, the proposed project would not likely result in a safety hazard for people residing or working in the Auburn Municipal Airport influence area or Truckee Tahoe Airport influence area. Therefore, a *less-than-significant* impact would occur.

The foregoing revisions to Chapter 1 of Draft EIR are provided for clarification purposes in response to public comment and do not affect the adequacy of the Draft EIR analysis.

Response to Comment 5-2

Please see Response to Comment 5-1.

Response to Comment 5-3

Please see Response to Comment 5-1.

Response to Comment 5-4

Please see Response to Comment 5-1.

Response to Comment 5-5

The comment is noted for the record. The County will condition future residential development on all rezone sites within ALUCP Zones C1 and C2 to comply with ALUCP Policy 3.6.1, as applicable.

Response to Comment 5-6

In response to the comment, page 7-28 of Chapter 7, Noise, of the Draft EIR is hereby revised, as follows:

> Three airports are located within Placer County: the Lincoln Regional Airport, the Auburn Municipal Airport, and the Blue Canyon-Nyack Airport. Of the 72 rezone sites, none are located within the Lincoln Regional Airport or Blue Canyon-Nyack Airport influence areas. However, ~~12~~ 11 of the proposed rezone sites are located entirely within the Auburn Municipal Airport influence area (Sites #35, #36, #42, ~~#43,~~ #51, #56, #57, #61, #65, #66, #70, and #74), and one rezone site (Site #58) is located partially within the Auburn Municipal Airport influence area. Site #43 is split between Zone C1 and Zone C2. It should also be noted that while the Truckee Tahoe Airport is not located within Placer County, a portion of the airport's overflight zone is within the County boundaries. As a result, one of the proposed rezone sites (Site #44) is located within the Truckee Tahoe Airport influence area.

The foregoing revisions to Chapter 7 of Draft EIR are provided for clarification purposes in response to public comment and do not affect the adequacy of the Draft EIR analysis.

Response to Comment 5-7

In response to the comment, page 7-31 of Chapter 7, Noise, of the Draft EIR is hereby revised, as follows:

> Therefore, exterior noise levels would comply with the Placer County 60 dBA L_{dn} exterior noise standard for rezone sites located closest to local airports. Additionally, it should be noted that the Placer County Airport Land Use Compatibility Plan (PCALUCP) ~~includes~~ requires buyer awareness measures including Recorded Overflight Notifications for projects within ~~overflight zones~~ Compatibility Zones C1 and C2. An overflight notification informs property owners that the property is subject to aircraft overflight and generation of noise. Overflight notifications are generally appropriate in areas outside the 60 dB CNEL noise contour.

The foregoing revisions to Chapter 7 of the Draft EIR are provided for clarification purposes in response to public comment and do not affect the adequacy of the Draft EIR analysis.

Response to Comment 5-8

See Response to Comment 5-5.

Letter 6

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezone Draft EIR
Date: Tuesday, February 20, 2024 9:38:18 AM

From: Mark D'Ambrogi <dambrogi@placerhillsfire.org>
Sent: Monday, February 19, 2024 2:36 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Rezone Draft EIR

Hello Kally,

6-1 I was reading through the draft EIR and noticed some information that is not correct. It doesn't affect the document, but it would be good to have correct info in the document.

Page 10-8

6-2 Penryn Fire Facilities Fees is $.96, a nexus study was completed in 2023, the fee was not updated. This study and request to implement the new fee is going to the BOS, supposedly in March (2024).

Page 10-10

6-3 Auto aid agreement between Placer Hills FPD and Peardale Chicago Park FPD does not exist. It references the MSR study from 2017?

6-4 Placer Hills FPD Fire Facility Fees are currently $.98, this was last updated in 2020, not 2008.
(Placer Hills, Newcastle, and Penryn FPD's, Fire Facility Fees request to increase are at the BOS for review and approval currently)

Page 10-38

6-5 The Newcastle Fire Station (new station) is located at 9350 Old State Highway, not 9211 Cypress St (old station location).

Again, not to be picky, just wanted to let you know of incorrect information in the document.

Thanks
Mark

LETTER 6: MARK D'AMBROGI, PLACER HILLS-NEWCASTLE-PENRYN FIRE PROTECTION DISTRICTS

Response to Comment 6-1

The commenter states that incorrect information was included in Chapter 10, Fire Protection and Wildfire, of the Draft EIR. As shown in the following Responses to Comments, the suggested minor revisions have been implemented.

Response to Comment 6-2

In response to the comment, page 10-8 of Chapter 10, Fire Protection and Wildfire, of the Draft EIR is hereby revised, as follows:

> The Penryn FPD collects development impact fees on new construction within the district, which goes towards the district's Mitigation Fund, used to purchase capital equipment. Currently, the Penryn FPD's Fire Facilities Fee is $0.96 per square foot of residential development. The fee was last updated in ~~2023~~ 2014.[6]

The foregoing revisions to Chapter 10 of Draft EIR are provided for clarification purposes in response to public comment and do not affect the adequacy of the Draft EIR analysis.

In addition, the information included in the Draft EIR was current at the time it was drafted. Future potential residential developers would be required to pay the applicable development impact fees in effect at the time of issuance of building permits.

Response to Comment 6-3

In response to the comment, page 10-10 of Chapter 10, Fire Protection and Wildfire, of the Draft EIR is hereby revised, as follows:

> Automatic and mutual aid agreements between Placer Hills FPD and 12 other fire protection agencies in western Placer County, including Alta FPD, South Placer FPD, Newcastle FPD, Penryn FPD, CAL FIRE, and the cities of Lincoln, Rocklin, and Roseville, are in place to provide an increased level of protection and to ensure the most efficient service to the communities. ~~Placer Hills PFD also has a formal automatic aid agreement with the Peardale Chicago Park FPD in Nevada County.[13]~~ In addition, the Placer Hills FPD has an Administrative Agreement with the Newcastle FPD and the Penryn FPD wherein the FPD's all operate under the same administration and share one chief officer. Although the Placer Hills FPD does not have an adopted response time standard for emergency calls, current response times in the Placer Hills FPD are between seven and ten minutes, which is better than the State average of 12 minutes.

The foregoing revision to Chapter 10 of Draft EIR is provided for clarification purposes in response to public comment and does not affect the adequacy of the Draft EIR analysis.

Response to Comment 6-4

In response to the comment, page 10-10 of Chapter 10, Fire Protection and Wildfire, of the Draft EIR is hereby revised, as follows:

> The Placer Hills FPD collects development impact fees specific to fire services for the area within the Placer Hill FPD, which was last updated in ~~2008~~ 2020. The fee was established to fund facility upgrades and new facilities that would be needed to serve new development.

> The Placer Hills FPD's facilities impact fees are $0.98 per square foot of residential development.

The foregoing revision to Chapter 10 of Draft EIR is provided for clarification purposes in response to public comment and does not affect the adequacy of the Draft EIR analysis.

In addition, as discussed under Response to Comment 6-2, future potential residential developers would be required to pay the applicable development impact fees in effect at the time of issuance of building permits.

Response to Comment 6-5

In response to the comment, page 10-38 of Chapter 10, Fire Protection and Wildfire, of the Draft EIR is hereby revised, as follows:

> While a new ladder truck within the FPDs' service area would be needed to meet the response time targets (NFPA Standard 1710), this would not constitute a CEQA impact unless a new or expanded fire station facility would be needed to house the ladder truck, as such new construction or alteration could result in physical impacts to the environment. According to Chief D'Ambrogi, the Newcastle FPD station, which is a new station completed last year located at ~~9211 Cypress Street~~ 9350 Old State Highway, Newcastle, CA 95658, was designed to accommodate a ladder truck and can do so efficiently.[33] If this were to be done, the response times would be in the range of 5-7 minutes, using Taylor Road or I-80 to the Penryn/Loomis areas.[34] Thus, the reasonably foreseeable residential development that could potentially result from the proposed project within the Penryn FPD and Placer Hills FPD jurisdictions would not require a new fire station or alteration of an existing fire station to house a new ladder truck, should the Newcastle FPD obtain sufficient funding to purchase said truck.

The foregoing revision to Chapter 10 of Draft EIR is provided for clarification purposes in response to public comment and does not affect the adequacy of the Draft EIR analysis.

Letter 7

From: Josh Lelko
To: Placer County Environmental Coordination Services
Cc: Carie Huff
Subject: Housing Element Sites Rezone (PLN22-00476)
Date: Monday, March 18, 2024 11:39:10 AM
Attachments: Request for Comment Letter - Housing Element DEIR.pdf
SPMUD Facilities Map - 3-3 B.pdf
SPMUD Facilities Map - 3-5.pdf
SPMUD Facilities Map - 3-3 A.pdf

Good Morning,

Attached the Districts comments regarding the Housing Element Sites Rezone (PLN22-00476) as well as facilities maps of the parcels located within the District's Boundary. Please confirm receipt of this email with attachments.

7-1

Please feel free to contact me if you have any questions or concerns.

Thank you,
Josh

Josh Lelko | Engineering Technician
South Placer Municipal Utility District | Technical Services Department
5807 Springview Drive, Rocklin, CA 95677
T: (916) 786-8555 x317 | E: jlelko@spmud.ca.gov | W: www.spmud.ca.gov
Our Mission: Protect | Provide | Prepare

E-mail correspondence with the South Placer Municipal Utility District (and attachments, if any) may be subject to the California Public Records Act, and as such may therefore be subject to public disclosure unless otherwise exempt under the Act.

SOUTH PLACER
MUNICIPAL UTILITY DISTRICT

March 18, 2024

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

Subject: Housing Element Sites Rezone (PLN22-00476)
(State Clearinghouse No. 2023100581)

To Whom it May Concern,

Thank you for the opportunity to comment on the Housing Element Sites Rezone Draft Environmental Impact Report (EIR) identifying the rezoning of seventy-two parcels to the new Residential Multifamily 30 zoning district.

The District has reviewed the draft environmental impact report and comments are provided below:

7-2 a. The proposed project includes the following parcels located within the District's boundary: APNs 043-060-032, 032-191-020, 032-220-010, 032-220-051, 043-060-045, 043-060-048, 043-072-018 and 043-072-019.

7-3 b. The change in zoning and density will require a sewer study/analysis stamped by a licensed engineer that compares sewer flow generated by the existing land use to that of the proposed project for review and approval (reference Section 3 of the District's Standards for design flow determination). The sewer study shall identify potential downstream capacity limitations. Offsite sewer improvements to accommodate the project(s) may be required.

7-4 c. The existing sewer trunk line adjacent to APN 043-060-048 requires upsizing and relocation to accommodate development of the parcel.

7-5 d. All on-site public and private sewer facilities shall be designed and constructed to the District's Standards.

7-6 e. There are existing sewer lines and manholes located on several of the parcels. Access to District facilities shall be maintained at all times.

7-7 f. Easements are required over all existing and proposed public sewer facilities. Any existing substandard easement, within the limits of the proposed project(s), shall be upgraded to current standards prior to approval of improvement plans, change of use or other entitlement request. The minimum easement width is 20-feet; however, the final width will be determined based on the size and depth of pipe. Buildings, structures, walls,

5807 SPRINGVIEW DRIVE • ROCKLIN, CALIFORNIA 95677 • PHONE (916) 786-8555 • FAX (916) 785-8553

7-7 Cont. fences, trees (including the drip line), large shrubs, and other permanent structures shall not encroach into the easement area. Note that the 20-feet includes vertical clearance (no building overhangs or other structures shall encroach into the easement).

7-8 g. All weather drivable access to and over existing District facilities is required and is not to be obstructed by permanent structures, including fencing, landscaping, parking, or other limiting improvements. The District's Standards define all-weather access as 3-inches of asphalt concrete (AC) over 8-inches of aggregate base (AB).

7-9 h. Minimum separation between utilities is required. The minimum separation between water and sewer is 10-feet from outside of pipe/structure to outside of pipe/structure. The minimum separation between sewer and all other utilities is 5-feet from outside of pipe/structure to outside of pipe/structure.

7-10 i. Improvement plans are required to be submitted to the District for review and approval.

7-11 j. Please contact the District for additional information on sewer participation fees.

7-12 k. In addition to the District's Capacity Charges/Participation Fees, the parcels are located within the boundary of two refund agreement areas. These fees are due at plan approval:
   a. Rocklin 60 - Phase 1 - $68.32 per EDU
   b. Rocklin 60 - Phase 2 - $139.76 per EDU

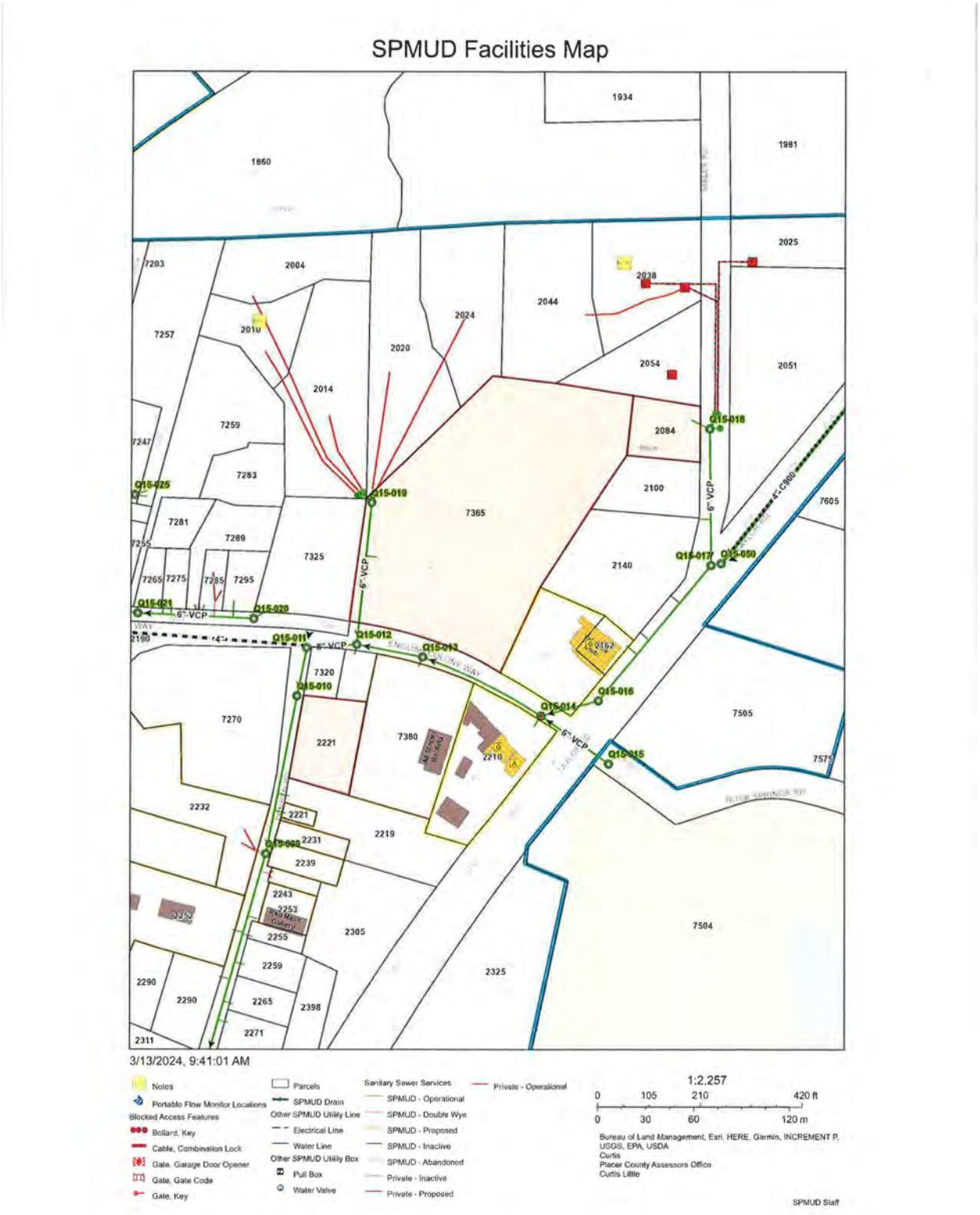
Please note that the District's Standards can be viewed at the District's website:

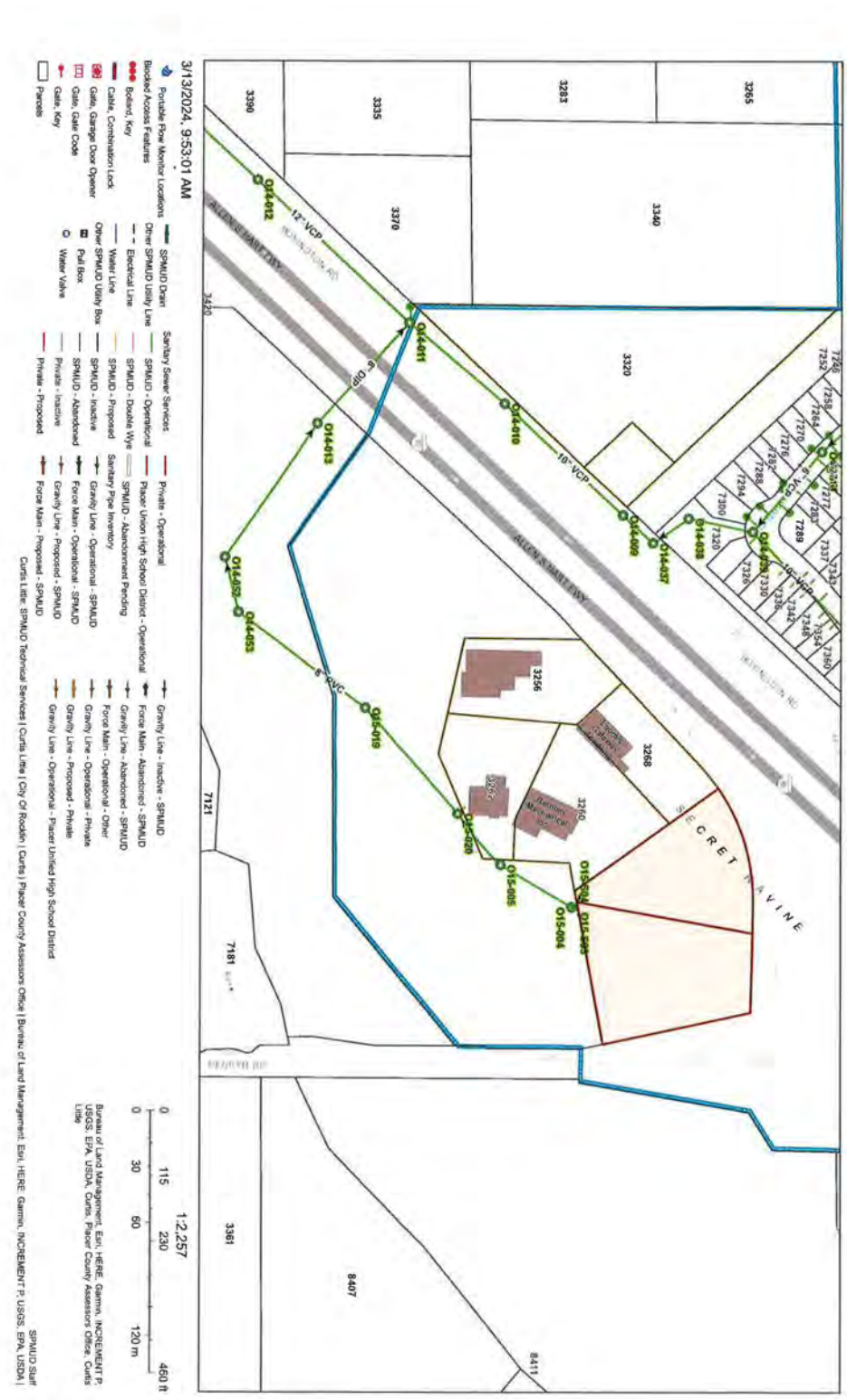
https://spmud.ca.gov/specifications-and-ordinances

Please do not hesitate to contact Josh Lelko at (916) 786-8555 extension 317 or jlelko@spmud.ca.gov if you have any questions or need additional information.

Sincerely,

Carie Huff, P.E.
District Engineer


SPMUD Facilities Map
1860
1934
1981
2025
7203
2004
2038
2044
7257
2010
2024
2020
2054
2051
2014
7259
2084
7247
Q15-018
Q15-025
7283
2100
Q15-019
7365
7605
7281
7289
6" VCP
7255
7325
2140
Q15-017
Q15-050
7265
7275
7285
7295
Q15-021
Q15-020
6" VCP
Q15-011
Q15-012
8" VCP
Q15-013
7320
Q15-010
Q15-016
Q15-014
7270
2221
7380
7505
6" VCP
Q15-015
7575
2232
2210
2219
2231
Q15-009
2239
2243
2253
2255
2305
7504
2259
2290
2265
2398
2325
2271
2311
3/13/2024, 9:41:01 AM
Notes
Portable Flow Monitor Locations
Blocked Access Features
Bollard, Key
Cable, Combination Lock
Gate, Garage Door Opener
Gate, Gate Code
Gate, Key
Parcels
SPMUD Drain
Other SPMUD Utility Line
Electrical Line
Water Line
Other SPMUD Utility Box
Pull Box
Water Valve
Sanitary Sewer Services
SPMUD - Operational
SPMUD - Double Wye
SPMUD - Proposed
SPMUD - Inactive
SPMUD - Abandoned
Private - Inactive
Private - Proposed
Private - Operational
1:2,257
0 105 210 420 ft
0 30 60 120 m
Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, USDA
Curtis
Placer County Assessors Office
Curtis Little
SPMUD Staff


SPMUD Facilities Map
3/13/2024, 9:53:01 AM
Portable Flow Monitor Locations
Blocked Accoss Features
Bollard, Key
Cable, Combination Lock
Gate, Garage Door Opener
Gate, Gate Code
Gate, Key
Parcels
SPMUD Drain
Other SPMUD Utility Line
Electrical Line
Water Line
Other SPMUD Utility Box
Pull Box
Water Valve
Sanitary Sewer Services
SPMUD - Operational
SPMUD - Double Wye
SPMUD - Abandonment Pending
SPMUD - Proposed
SPMUD - Inactive
SPMUD - Abandoned
Private - Inactive
Private - Proposed
Private - Operational
Placer Union High School District - Operational
Sanitary Pipe Inventory
Gravity Line - Operational - SPMUD
Force Main - Operational - SPMUD
Gravity Line - Proposed - SPMUD
Force Main - Proposed - SPMUD
Gravity Line - Inactive - SPMUD
Force Main - Abandoned - SPMUD
Gravity Line - Abandoned - SPMUD
Force Main - Operational - Other
Gravity Line - Operational - Private
Gravity Line - Proposed - Private
Gravity Line - Operational - Placer Unified High School District
Curtis Little, SPMUD Technical Services | Curtis Little | City Of Rocklin | Curtis | Placer County Assessors Office | Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, USDA |
1:2,257
0 115 230 460 ft
0 30 60 120 m
Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, USDA, Curtis, Placer County Assessors Office, Curtis Little
SPMUD Staff
3265
3283
3340
3335
3370
3390
3320
3420
3256
3268
3260
3250
7121
7181
3361
8407
8411
ALLEN'S BAR LEAVY
SECRET RAVINE
12" VCP
10" VCP
8" VCP
6" DIP
8" PVC
014-011
014-012
014-013
014-010
014-009
014-037
014-038
014-052
014-053
015-019
015-020
015-005
015-004
015-003

SPMUD Facilities Map



LETTER 7: CARIE HUFF, SOUTH PLACER MUNICIPAL UTILITY DISTRICT

Response to Comment 7-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 7-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 7-3
The comment is noted. As growth occurs, proposed projects will be required to analyze their impacts to sewer infrastructure capacity, if necessary, construct sewer improvements to serve their developments, and pay fair share fees to fund the required future capacity improvements to the existing sewer infrastructure.

Response to Comment 7-4
Please see Response to Comment 7-3.

Response to Comment 7-5
The comment is noted. Proposed projects within the South Placer Municipal Utility District's (SPMUD's) jurisdiction will be reviewed and conditioned by SPMUD per the District's standards and requirements, with appropriate fees paid accordingly. The comment does not address the adequacy of the Draft EIR.

Response to Comment 7-6
Please see Response to Comment 7-5.

Response to Comment 7-7
Please see Response to Comment 7-5.

Response to Comment 7-8
Please see Response to Comment 7-5.

Response to Comment 7-9
Please see Response to Comment 7-5.

Response to Comment 7-10
Please see Response to Comment 7-5.

Response to Comment 7-11
Please see Response to Comment 7-5.

Response to Comment 7-12
Please see Response to Comment 7-5.

Letter 8

From: Defend Granite Bay - A Community Association
To: Placer County Environmental Coordination Services
Cc: Kally Kedinger-Cecil; Christopher Schmidt; Megan Wood; GBCA; public-interest@live.com
Subject: Comments for Planning Commission Hearing RM 30 rezone proposal
Date: Wednesday, February 21, 2024 2:35:23 PM
Attachments: image.png
image.png

DEFEND GRANITE BAY

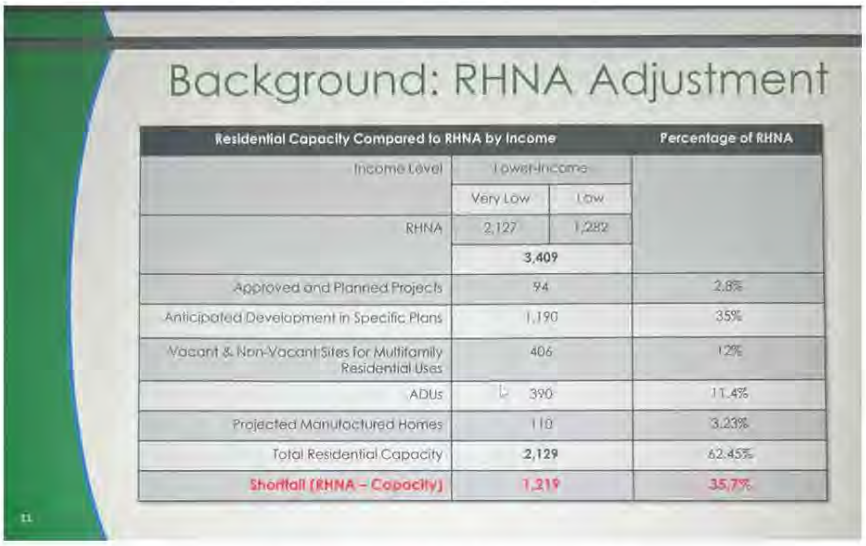
Planning Commissioners,

Prior to being able to comment on the DEIR for the proposed RM30 zone district, the following information is required. We respectfully request that you address staff with our concerns:

8-1 1) Staff indicates that additional information will be presented at today's hearing. To comply with Brown Act requirements, will the date to comment on the DEIR be extended?

8-2 2) Exactly what is the county shortfall of affordable housing? The housing element approved by HCD cited 1,107 units, staff presentations list 1,219 however the slide presented to the community and Board has mathematical errors. When adding the number of total residential capacity, the total is 2190, yet the total presented is **2129**. Is the overall need 1219 or 1280? This is a significant difference of 61 units. (3409 - 94 -1190 - 406 - 390 - 110 = 1219 or 3409-2129= 1280)

8-2 con't



8-3

3) The housing element considered increasing the minimum number of units of current RM zoning to 30 units from 20, which reduces the total obligation from 55.3 acres to 36.9 acres. Why was this previously contemplated zoning text amendment change not considered as an alternative in the DEIR (chpt 4 - pg 110)?

3) The housing element considered increasing the minimum number of units of current RM zoning to 30 units from 20, which reduces the total obligation from 55.3 acres to 36.9 acres. Why was this previously contemplated zoning text amendment change not considered as an alternative in the DEIR (chpt 4 - pg 110)? This would reduce the numbers and impacts on rural communities.

8-4

4) The 18-acre parcel in Granite Bay #26 does not meet existing CA requirements of being 10 acres or less. How does this meet the intent of the law?

8-5

5) Parcel 26 has been used for more than 5 years as an access point to Folsom Lake and Cavitt Junior High School based on individual comments submitted to the Housing Element Workshop. The property owner has taken no steps to discourage or post that the property is private. Has this been taken into consideration?

8-6 6) Supervisor Gustafson has stated that some parcels in District 5 have had dozens of comments deeming the parcels inappropriate. These are to be removed. Parcel 26 is the subject of a petition which has received 800+ signatures within 245 hours. Is this being taken into consideration?

8-7 7) How is selecting 74 random parcels distributed throughout the county with concentration in 3 communities not considered "spot rezones" prohibited under CEQA? No consideration of immediately adjacent and contiguous parcels has been considered. This selection process defeats the intent of orderly development guaranteed to property owners through the General and multiple community plans

8-8 8) How will the decrease in adjacent property values be addressed?

The Defend Granite Bay Board and members

PREVIOUS COMMENTS

DEFEND GRANITE BAY

Supervisors Gore, Landon, Holmes, Jones and Gustafson,

8-9 Since 2019, CDRA has been well aware of the shortfall of affordable housing in Placer County. At that time, HCD indicated that Placer was "in their crosshairs" since the County progress report showed that 99%+ above moderate housing was constructed with only 2.6% very low/extremely low and 8.8% of low income housing completed which is needed by 55+% of all households. Even with this information, 3 current members of this board, Supervisor Gore, Supervisor Holmes and Supervisor Gustafson proceeded to approve the most environmentally destructive alternative in the Placer Ranch/Sunset Area Plans with affordable housing in the last phases of construction.

8-9 con't

At that time, a Citizen's Initiated Smart Growth Plan was presented which achieved almost all the County objectives while providing a mix of housing that would have fulfilled Placer obligations for at least a decade. Since that time, the County has continued to rezone away high density and commercial properties in favor of low-density, high end-urban sprawl. Now in a "put your feet to the fire" because "the State is making us do it", a Rezone program is being presented with population inducing "spot rezones" in established communities; further compromising already at capacity schools, fire, police and traffic. Sewer and water availability are poor qualifiers to double the population of Penryn, over-inundate Auburn with low-income housing and create pockets of high density in Granite Bay where affordable is $4000.00 per month.

None of these areas are equipped to handle this type of increase in population without compromising existing residents' quality of life.

Before proceeding, it should be clarified by staff exactly what percentage of affordable housing is required for each community such as Auburn, Penryn and Granite Bay based on population and acreage as indicated in the housing element.

Staff indicates that 'County Owned" properties could relieve almost half the affordable housing shortfall, yet does not include these or other potential county properties in their analysis. Excuses that areas within Placer Ranch and Sunset cannot be rezoned since it is not time feasible to amend the plans; yet it is time feasible to amend numerous community plans???.

Metrics are inconsistently applied. A 15+ acre in Auburn was excluded since it exceeded the 10 acre maximum, yet an 18 acre parcel in Granite Bay is being subdivided to fit the model. This is haphazard and piecemeal to say the very least.

After 20 years of accommodating projects, it is time to course correct and have projects accommodate the residents you represent. An entire city is being built on the west side of the County. All mixed-use should be allowed higher density and intensity; of the 2300+ units in the active CEQA project list, none should be allowed to fulfill their obligation with ADU's since it is clear very few if any will be rented or lead to home ownership.

Established communities should be required to provide their fair share based on population as per your own housing element. Residents should not be asked to have their property values impacted or their health, safety and quality of lives diminished due to preferential decisions prior to 2020.

Thank you
The Defend Granite Bay Board and members

LETTER 8: DEFEND GRANITE BAY

Response to Comment 8-1
The County has elected not to extend the public comment period for the Draft EIR beyond the State-mandated 45-day period.

Response to Comment 8-2
The Regional Housing Needs Assessment (RHNA) "shortfall" is 1,219 units.

Response to Comment 8-3
In order to meet State housing requirements identified in the County's Housing Element, high density residential zoning at 20-units minimum per acre is required to meet the County's unmet housing needs. State law requires that the rezoned sites provide for a minimum density of 20-units per acre and those sites allow the development of higher density housing as an allowed use. Establishing a 30-unit minimum per acre is not a feasible option because there are not any multi-family housing developments in unincorporated Placer County or neighboring jurisdictions constructed at that density and, therefore, HCD would not accept a higher-density minimum approach to meeting the County's unmet housing needs.

The suggested increased density alternative therefore was not considered. CEQA Guidelines section 15124(b) requires an EIR's project description to describe the purpose of the proposed project including a statement of the objectives sought by the proposed project: "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project." The underlying purpose of the project is compliance with HCD regulations and ensuring residential opportunities for all residents of the County.

Response to Comment 8-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 8-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 8-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 8-7
CEQA documents analyze and disclose the direct or indirect physical impacts of a project on the environment. CEQA documents are fact-based and impartial impact analyses that provide decision making bodies with a clear understanding of the environmental ramifications of their decisions. CEQA analyses do not prohibit projects. Spot rezoning is a planning consideration, not a CEQA issue. Rezoning a single property has been determined by the California Courts (see *Foothill Communities Coalition v. County of Orange* and *Avenida San Juan Partnership v. City of San Clemente*) to be proper so long as it is in the public interest. Rezones are discretionary actions that require approval from the legislative body, in this case, the Placer County Board of Supervisors. The Board will be required to make requisite findings to support its decision.

Response to Comment 8-8

Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 8-9

Please see Responses to Comment Letter 10.

Letter 9

From:	Kally Kedinger-Cecil
To:	Placer County Environmental Coordination Services
Subject:	FW: Housing Element Amendment Available for Public Review
Date:	Thursday, March 7, 2024 4:21:41 PM
Attachments:	image001.png image.png

From: Defend Granite Bay - A Community Association <defendgb@gmail.com>
Sent: Thursday, March 7, 2024 3:02 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Christopher Schmidt <CRSchmid@placer.ca.gov>
Cc: GBCA <gbca@granitebay.com>; public-interest@live.com; Suzanne Jones <SuzanneJones@placer.ca.gov>; Jim Holmes <JHolmes@placer.ca.gov>
Subject: Re: Housing Element Amendment Available for Public Review

DEFEND GRANITE BAY

Thank you for the opportunity to comment on the proposed housing element amendments.

9-1

HE 51 Replacement Units

1. The language is convoluted/confusing and requires clarity.

9-2

2. In order to achieve the Quantified Objective "to prevent **displacement** of lower-income households due to loss of affordable units", it should be clarified that units cannot be built off site or transferred to later phases as the definition of "displacement" is "to move something from its place or position".

   a. Allowing units to be constructed off site would defeat the policy objective, Fair Housing legislation and HCD guidelines.

   b. Allowing units to be constructed off site would further segregate the housing mix of new development and disproportionately distribute units countywide .

HE-52 Large Site Development

1. HCD guidelines for inventory site selection are in direct conflict with Large Site development.

9-3

a. "…parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location."

2. The two parcels identified as the Quantified Objective to facilitate development on sites 34 and 26 which could accommodate 357 units for lower income households, fail to meet HCD guidelines for selection.

a. Parcel 34 is located in a community with a median salary below the moderate-income threshold.

9-4

i. Per HCD Housing Element Site Inventory Guidebook Government Code Section 65583.2., "For purposes of the housing element site inventory, this means that sites identified to accommodate the lower-income need are **not concentrated** in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty."

ii. The Auburn school district is in financial distress and job centers are located in Roseville which defeat other HCD and Legislative guidelines.

1) Parcel 26 in Granite Bay does not meet the requisite of Financial Feasibility.

9-5

a. An estimated value per acre is $500,000.00. With the increased density permitted, this raised the value significantly which can be fairly argued would make construction of Low or

Very Low-income housing cost prohibitive.

b. Should funding be miraculously found, per HCD "parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location."

9-5 con't

c. Unless deed restricted to low or very low-income housing, density of this nature is in violation of the Granite Bay Community Plan, which HCD recognizes at the authoritative document. Granite Bay currently has less than 1% of land use designated for high density with the intent to keep the community rural.

2) Environmental Constraints Government Code section 65583.2(b)(4)

9-6

a. Since this programmatic EIR does not take site specific constraints into consideration, it is unknown at this time if the site is suitable. Reliance on mitigation under the PCCP is premature and would require a PCCP review prior to selection for eligibility.

b. Under Current zoning of CPD Dc, the parcel is identified in both the General and Granite Bay Community Plan as aesthetically and biologically significant.

i. It can be fairly argued that to achieve the proposed intensity, most if not all significant Oaks, Oak Woodlands and wetlands would be destroyed.

9-7

In summary, these Policies, without modification, create a development program promoting income segregation and low-income concentration in violation of AB 686.

The proposed large parcel sites and concentration within Auburn and Penryn disproportionately concentrate low and very low-income units in

already below moderate and at moderate income communities. Parcel 26, provides a significant number of financially unachievable units within Granite Bay.

9-7 Cont.

Alternatives with county owned properties should be explored in order to meet HCD deadlines or an extension is fairly requested so that staff has time for further analysis.

Consider these comments as for both the amendment and DEIR.

The Granite Bay Board and members

On Fri, Mar 1, 2024 at 3:15 PM Kally Kedinger-Cecil <KKedinge@placer.ca.gov> wrote:

> Hello,
>
> This email is to inform you of the availability of the Housing Element Amendment for a seven-day public review period. The amendment has been compiled to address changes that have occurred since adoption in 2021 including the revisions to the Regional Housing Needs Allocation (RHNA) shortfall, the change in approach for accommodating the shortfall (from relying on an overly to now completing a rezone), and the modifications to the Housing Element Residential Land Inventory which includes the addition of nine new sites that were not previously identified in the adopted Housing Element. The public review period is beginning today (March 1, 2024) and closes on **March 7, 2024**. Following the public review period, the amendment and any comments received will be provided to the California Department of Housing and Community Development (HCD) for a 60-day review period. The amendment will be included with the report package for the Board of Supervisors meeting for a final action in May. The amendment and the appendix are available on the Housing Element webpage. In addition to this email notice and the posting on the Housing Element webpage, a notice regarding the amendment is being posted on the County's main webpage, the Housing Needs Rezone Program webpage, and social media.
>
> Comments on the Housing Element Amendment can be submitted to Senior Planner Kally Kedinger-Cecil at kkedinge@placer.ca.gov or submitted in writing to:
>
> Placer County Community Development Resource Agency
> Planning Services Division
> 3091 County Center Dr., Ste. 190
> Auburn, CA 95603
>
> Regards,
>
> Kally Kedinger-Cecil
> Senior Planner

Placer County Planning Services Division
kkedinge@placer.ca.gov
530-745-3034



LETTER 9: DEFEND GRANITE BAY

Response to Comment 9-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 9-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 9-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 9-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 9-5
Please see Response to Comment 9-4.

Response to Comment 9-6
As discussed in Chapter 5, Biological Resources, of the Draft EIR, future development on rezone sites within the jurisdiction of the Placer County Conservation Program (PCCP) would be subject to mitigation measures to reduce biological resource impacts to less-than-significant including but not limited to field surveys by a qualified biologist, avoidance and minimization measures, PCCP land conversion authorization, Section 1600 Lake or Streambed Alternation Agreement from the California Department of Fish and Wildlife (CDFW), coverage under the County Aquatic Resources Program (CARP), etc.

Response to Comment 9-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 10

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Elements Sites Rezone workshop 2/13/2023
Date: Tuesday, February 20, 2024 9:19:34 AM
Attachments: image.png

From: Defend Granite Bay - A Community Association <defendgb@gmail.com>
Sent: Monday, February 12, 2024 5:40 PM
To: Megan Wood <MWood@placer.ca.gov>; Bonnie Gore <BonnieGore@placer.ca.gov>; Shanti Landon <SLandon@placer.ca.gov>; Jim Holmes <JHolmes@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>
Cc: GBCA <gbca@granitebay.com>; Alliance For Environmental Leadership <Allianceforenviroleadership@gmail.com>; public-interest@live.com; Christopher Schmidt <CRSchmid@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Housing Elements Sites Rezone workshop 2/13/2023

DEFEND GRANITE BAY

Supervisors Gore, Landon, Holmes, Jones and Gustafson,

10-1 Since 2019, CDRA has been well aware of the shortfall of affordable housing in Placer County. At that time, HCD indicated that Placer was "in their crosshairs" since the County progress report showed that 99%+ above moderate housing was constructed with only 2.6% very low/extremely low and 8.8% of low income housing completed which is needed by 55+% of all households. Even with this information, 3 current members of this board, Supervisor Gore, Supervisor Holmes and Supervisor Gustafson proceeded to approve the most environmentally destructive alternative in the Placer Ranch/Sunset Area Plans with affordable housing in the last phases of construction.

At that time, a Citizen's Initiated Smart Growth Plan was presented which achieved almost all the County objectives while providing a mix of housing that would have fulfilled Placer obligations for at least a decade. Since that time, the County has continued to rezone away high density and commercial properties in favor of low-density, high end-urban sprawl. Now in a "put your feet to the fire" because "the State is making us do it", a Rezone program is being presented with population inducing

"spot rezones" in established communities; further compromising already at capacity schools, fire, police and traffic. Sewer and water availability are poor qualifiers to double the population of Penryn, over-inundate Auburn with low-income housing and create pockets of high density in Granite Bay where affordable is $4000.00 per month.

10-1 con't

None of these areas are equipped to handle this type of increase in population without compromising existing residents' quality of life.

Before proceeding, it should be clarified by staff exactly what percentage of affordable housing is required for each community such as Auburn, Penryn and Granite Bay based on population and acreage as indicated in the housing element.

10-2

Staff indicates that 'County Owned" properties could relieve almost half the affordable housing shortfall, yet does not include these or other potential county properties in their analysis. Excuses that areas within Placer Ranch and Sunset cannot be rezoned since it is not time feasible to amend the plans; yet it is time feasible to amend numerous community plans???.

10-3

Metrics are inconsistently applied. A 15+ acre in Auburn was excluded since it exceeded the 10 acre maximum, yet an 18 acre parcel in Granite Bay is being subdivided to fit the model. This is haphazard and piecemeal to say the very least.

10-4

After 20 years of accommodating projects, it is time to course correct and have projects accommodate the residents you represent. An entire city is being built on the west side of the County. All mixed-use should be allowed higher density and intensity; of the 2300+ units in the active CEQA project list, none should be allowed to fulfill their obligation with ADU's since it is clear very few if any will be rented or lead to home ownership.

Established communities should be required to provide their fair share based on population as per your own housing element. Residents should not be asked to have their property values impacted or their health, safety and quality of lives diminished due to preferential decisions prior to 2020.

Thank you
The Defend Granite Bay Board and members

LETTER 10: DEFEND GRANITE BAY

Response to Comment 10-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 10-2
Please see Master Response 3 – County-Owned Sites.

Response to Comment 10-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 10-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 11

From:	Defend Granite Bay - A Community Association
To:	Placer County Environmental Coordination Services; Kally Kedinger-Cecil; Christopher Schmidt
Cc:	GBCA; public-interest@live.com; srabe@auburn.ca.gov; jrogers@auburn.ca.gov; cconsolini@loomis.ca.gov; info@mapf.org
Subject:	Comments - Housing Needs Rezone Program
Date:	Monday, March 18, 2024 2:09:41 PM
Attachments:	image.png sites_inventory_memo_final06102020 (1).pdf County Owned Properties Granitte Bay 2.pdf County Owned Properties West Rosevillepdf.pdf County Owned Properteis Newcastle Penryn.pdf County Owned Properties Auburn Sites 1-6, 117-125, 157-158, 162-167.pdf

DEFEND GRANITE BAY



Please accept our comments as part of the administrative record.

11-1 In preface, by not adhering to HCD procedures and guidelines for site inventory selection, it can be perceived that the County is opening itself up to scrutiny regarding fair housing practices. (See HCD's sites_inventory_memo_final attached) At minimum, the concentration of units in Penryn will double its population.

11-2 Based on letters received from the City of Auburn, Town of Loomis, Penryn Fire Department, Auburn Fire Department, Penryn and Granite Bay regarding the targeting of communities with median salaries at or below the low-income level, lack of fire protection, impacted school, closed library and fire station, no jobs, no mass transit and identified sewer infrastructure deficiencies, the concentration of low housing in Auburn, Penryn and Granite Bay can be seen as violating the intent of HCD Goals and Policies, AB686 and the General Plan:

AB686

"Under state law, affirmatively further fair housing means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation".

Placer's Housing element further cites "Ensure that sites zoned to accommodate housing for lower-income households are not concentrated in lower resource areas and segregated concentrated areas of poverty, but rather dispersed

11-2 con't | throughout the community, including in areas with access to greater resources, amenities, and opportunity.":

COMMENTS

11-3 | I. The Reduced Inventory Site Alternative is flawed as it relies on adoption of a new Policy which authorizes **illegal** spot rezones, denial of **guaranteed rights** to public notification and the HCD intent to keep projects small so as not to segregate, concentrate or create pockets of disparity. Without approval of a Large Lot Development Policy, this alternative is not feasible. As such, the DEIR does not offer a range of feasible alternatives for comments and decision makers.

a. CEQA Guidelines Section 15126.6(d)). By examining a range of alternatives, the Lead Agency can demonstrate that it has taken a "hard look" at the project objectives to select alternatives that allow for meaningful comparison (See Residents Ad Hoc Stadium Committee v. Board of Trustees (1979)).

11-4 | II. DEIR incorrectly states that sites selected are "planned for" which conflicts with State recognized community plans of Auburn, Granite Bay, Loomis and Horseshoe Bar/ Penryn where significant resources have been identified as **unavailable**: therefore internally inconsistent.

a. AB686

i. A (c) (i) Existing state law requires that housing elements are internally consistent and that the housing element and the other components of a jurisdiction's General Plan are internally consistent.

ii. 2 (a) (ii) (b) Encouraging development of new affordable housing in high resource areas

11-5 | III. The DEIR failed to take comments from the NOP Scoping meeting into any consideration regarding lack of jobs, transportation, income inequity, impacted schools, adequate sewer, etc.

a. AB 686 3 (b) (i) Ensure that sites zoned to accommodate housing for lower-income households are not concentrated in lower resource areas and segregated concentrated areas of poverty, but rather dispersed throughout the community, including in areas with access to greater resources, amenities, and opportunity.

11-6 | b. Placer County finds that "Existing sewer infrastructure is not

11-6 con't

sufficient to meet the projected build out needs of the community plan in GB Penryn/Horseshoe Bar. Some portion of the existing trunk line collection system lacks adequate capacity to accommodate the projected needs for the future buildout of the service area. Individual developments proposed in the area would be required to pay fair share fees to fund the required capacity improvements to the existing sewer infrastructures."

11-7

IV. Parcel 26 in Granite Bay was not recognized as scenic in the EIR; its current zoning designation is CPD Dc.

11-8

V. As prime real estate in an upper priced community, the DEIR fails to provide an explanation of how affordable housing is financially feasible as required by HCD in its site inventory selection. Have grants been identified to purchase what has been estimated at ~ $500,000 per acre at current zoning with significant increase in value after the rezone?

i. Chapter 2: Housing Needs Assessment), a four-person low-income household can afford a maximum purchase price of $296,011, which includes financing costs, taxes, mortgage insurance, and homeowners' insurance.

ii. With no requirement for affordable housing, how will this parcel contribute to the number of low and very low-income housing objective?

11-9

Withdrawal of parcels 26 & 34 would provide the 75% of identified units needed to request an extension, not require a presumably illegal County Policy as the County may have more restrictive but not less restrictive requirements than the state and allow staff time to review smaller county-owned parcels which would more evenly distribute affordable units and aligned with HCD and community goals and plans. (see provided county-owned potential properties)

Respectfully

The Defend Granite Bay Board and members

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY — GAVIN NEWSOM, *Governor*

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

June 10, 2020

MEMORANDUM FOR: Planning Directors and Interested Parties

FROM: Megan Kirkeby, Acting Deputy Director
Division of Housing Policy Development

SUBJECT: **Housing Element Site Inventory Guidebook**
Government Code Section 65583.2

The housing element of the general plan must include an inventory of land suitable and available for residential development to meet the locality's regional housing need by income level. The purpose of this Guidebook is to assist jurisdictions and interested parties with the development of the site inventory analysis for the 6th Housing Element Planning Cycle and identify changes to the law as a result of Chapter 375, Statutes of 2017 (AB 1397), Chapter 958, Statutes of 2018 (AB 686), Chapter 664, Statutes of 2019 (AB 1486), and Chapter 667, Statutes of 2019 (SB 6). The Guidebook should be used in conjunction with the site inventory form developed by the California Department of Housing and Community Development (HCD). These laws introduced changes to the following components of the site inventory:

- Design and development of the site inventory (SB 6, 2019)
- Requirements in the site inventory table (AB 1397, 2017 AB 1486, 2019)
- Capacity calculation (AB 1397, 2017)
- Infrastructure requirements (AB 1397, 2017)
- Suitability of nonvacant sites (AB 1397, 2017)
- Size of site requirements (AB 1397, 2017)
- Locational requirements of identified sites (AB 686, 2018)
- Sites identified in previous housing elements (AB 1397, 2017)
- Nonvacant site replacement unit requirements (AB 1397, 2017)
- Rezone program requirements (AB 1397, 2017)

The workbook is divided into five components: (Part A) identification of sites; (Part B) sites to accommodate the lower income RHNA; (Part C) capacity analysis; (Part D) non-vacant sites; and (Part E) determination of adequate sites.

If you have any questions, or would like additional information or technical assistance, please contact the Division of Housing Policy Development at (916) 263-2911.

Table of Contents

BACKGROUND AND PURPOSE 3
Housing Element Site Inventory Requirements 3
SITE INVENTORY GUIDEBOOK FRAMEWORK 4
Guidebook Structure 4
PART A: IDENTIFICATION OF SITES 5
Step 1: Identification of Developable Sites 5
Step 2: Inventory of Sites 7
Step 3: Infrastructure Availability 7
Step 4: Map of Sites 8
Step 5: Determination of Consistency with Affirmatively Furthering Fair Housing 8
Step 6: Sites by RHNA Income Category 9
Step 7: Environmental Constraints 10
PART B: SITES TO ACCOMMODATE LOW AND VERY LOW- INCOME RHNA 11
Step 1: Sites Used in Previous Planning Periods Housing Elements 11
Step 2: Zoning Appropriate to Accommodate Low- and Very Low- Income RHNA 13
Step 3: Size of Sites 15
PART C: CAPACITY ANALYSIS 19
Step1: Utilizing minimum densities to calculate realistic capacity of sites 19
Step 2: Utilizing factors to calculate realistic capacity of sites 19
PART D: NONVACANT SITES 24
Step 1: Description of the nonvacant site 25
Step 2: Nonvacant site analysis methodology 25
Step 3: Reliance on nonvacant sites to accommodate more than 50 percent of the RHNA for lower income households 26
Step 4: Program and policy requiring replacement of existing affordable units 28
PART E: DETERMINATION OF ADEQUATE SITES 30
Step 1: Consider any alternative means of meeting the RHNA 30
Step 2: Determine whether there is sufficient capacity to accommodate the RHNA for the jurisdiction by income. 32
Step 3: Adequate Sites Program 33
ATTACHMENT 1: SUMMARY OF NEW LAWS REFERENCED IN THE GUIDEBOOK 39
ATTACHMENT 2: GOVERNMENT CODE SECTION 65583.2 40

BACKGROUND AND PURPOSE

Housing Element Site Inventory Requirements

Scarcity of land with adequately zoned capacity is a significant contributor to increased land prices and housing development costs. A lack of adequately zoned sites exacerbates the already significant deficit of housing affordable to lower income households. An effective housing element provides the necessary conditions for conserving, preserving and producing an adequate supply of housing affordable at a variety of income levels and provides a vehicle for establishing and updating housing and land-use strategies to reflect changing needs, resources, and conditions. Among other things, the housing element establishes a jurisdiction's strategy to plan for and facilitate the development of housing over the five-to-eight year planning period by providing an inventory of land adequately zoned or planned to be zoned for housing and programs to implement the strategy.

The purpose of the housing element's site inventory is to identify and analyze specific land (sites) that is available and suitable for residential development in order to determine the jurisdiction's capacity to accommodate residential development and reconcile that capacity with the jurisdiction's Regional Housing Need Allocation (RHNA). The available and suitable sites are referred to as "adequate sites" throughout this Guidebook. The site inventory enables the jurisdiction to determine whether there are sufficient adequate sites to accommodate the RHNA by income category. A site inventory and analysis will determine whether program actions must be adopted to "make sites available" with appropriate zoning, development standards, and infrastructure capacity to accommodate the new development need.

Sites are suitable for residential development if zoned appropriately and available for residential use during the planning period. If the inventory demonstrates that there are insufficient sites to accommodate the RHNA for each income category, the inventory must identify sites for rezoning to be included in a housing element program to identify and make available additional sites to accommodate those housing needs early within the planning period.

Other characteristics to consider when evaluating the appropriateness of sites include physical features (e.g., size and shape of the site, improvements currently on the site, slope instability or erosion, or environmental and pollution considerations), location (e.g., proximity to and access to infrastructure, transit, job centers, and public or community services), competitiveness for affordable housing funding (e.g., Low Income Housing Tax Credit scoring criteria), and likelihood or interest in development due to access to opportunities such as jobs and high performing schools[1]. When determining sites to include in the inventory to meet the lower income housing need, HCD recommends that a local government first identify development potential in high opportunity neighborhoods. This will assist the local government in meeting its requirements to affirmatively further fair housing and ensure developments are more competitive for development financing.

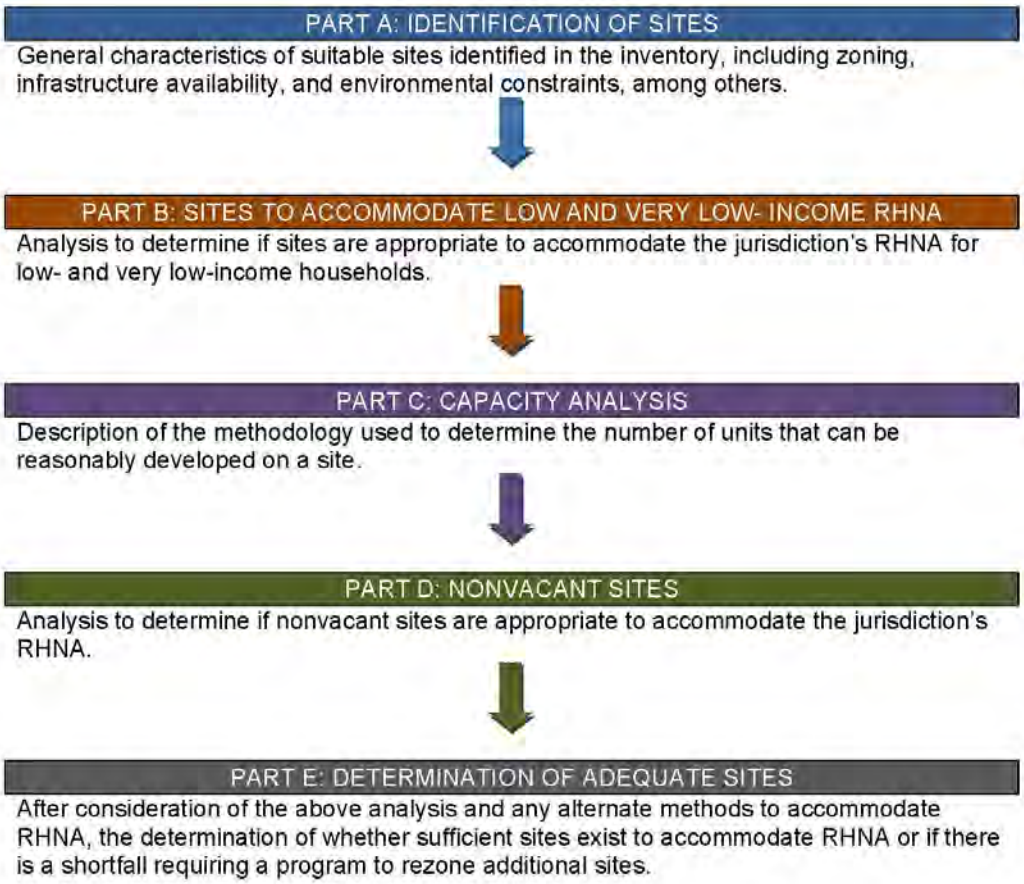
---

[1] Please Note: Significant increases in the housing capacity of the residential land inventory of the housing element could also warrant planning for updating of other elements, including the land use, safety, circulation elements and inclusion of an environmental justice element or environmental justice policies. The housing element must include a program describing the means by which consistency will be achieved with other general plan elements and community goals (GC 65583(c)(8)).

SITE INVENTORY GUIDEBOOK FRAMEWORK

The following is a Guidebook designed to assist a jurisdiction through the site inventory analysis required by Housing Element Law. Use of the Guidebook is not required for a determination of compliance by HCD. The Guidebook is intended to facilitate the jurisdiction in determining if adequate sites are available by income category to accommodate the jurisdiction's share of the RHNA or if rezoning or other program actions are needed. Areas of the law that are newly added since the beginning of the 5th housing element cycle are marked with the designation ***NEW***.

Guidebook Structure



PART A: IDENTIFICATION OF SITES

Step 1: Identification of Developable Sites
Government Code section 65583.2(a)

Generally, a site is a parcel or a group of parcels that can accommodate a portion of the jurisdictions RHNA. A jurisdiction must identify, as part of an inventory, sites within its boundaries (i.e., city limits or a county's unincorporated area)[2] that could have the potential for new residential development within the eight- or five-year timeframe of the housing element planning period.

Types of sites include:

- Vacant sites zoned for residential use.
- Vacant sites zoned for nonresidential use that allow residential development.
- Residentially zoned sites that are capable of being developed at a higher density (nonvacant sites, including underutilized sites).
- Sites owned or leased by a city, county, or city and county.
- Sites zoned for nonresidential use that can be redeveloped for residential use and a program is included to rezone the site to permit residential use.

Pending, approved, or permitted development:

Projects that have been approved, permitted, or received a certificate of occupancy since the beginning of the RHNA projected period may be credited toward meeting the RHNA allocation based on the affordability and unit count of the development. For these projects, affordability is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project (See Part E). For projects yet to receive their certificate of occupancy or final permit, the element must demonstrate that the project is expected to be built within the planning period.

Definition of Planning Period: The "Planning period" is the time period between the due date for one housing element and the due date for the next housing element (Government Code section 65588(f)(1).) For example, the San Diego Association of Governments' 6th Cycle Planning Period is April 15, 2021 to April 15, 2029.

Definition of Projection Period: "Projection period" is the time period for which the regional housing need is calculated (Government Code section 65588(f)(2).). For example, the San Diego Association of Governments' 6th Cycle Projection Period is June 30, 2020 to April 15, 2029.

Please note, sites with development projects where completed entitlements have been issued are no longer available for prospective development and must be credited towards the RHNA based on the affordability and unit count of the development. "Completed entitlements" means a housing development or project which has received all the required land use approvals or entitlements necessary for the issuance of a building permit. This

[2] In some cases, jurisdictions may want to include sites anticipated to be annexed in the planning period. Annexation is considered a rezoning effort to accommodate a shortfall of sites. For more information on annexation please see Part E, Step 3.

means that there is no additional action required to be eligible to apply and obtain a building permit.

Jurisdictions may choose to credit sites with pending projects since the beginning of the RHNA projection period towards their RHNA based on affordability and unit count within the proposed project but must demonstrate the units can be built within the remaining planning period. Affordability must be based on the projected sales prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project.

Census definition of a unit: A housing unit is a house, an apartment, a group of rooms, or a single room occupied or intended for occupancy as separate living quarters. Separate living quarters are those in which the occupants do not live and eat with other persons in the structure and which have direct access from the outside of the building or through a common hall. Living quarters of the following types are excluded from the housing unit definition: dormitories, bunkhouses, and barracks; quarters in predominantly transient hotels, motels, and the like, except those occupied by persons who consider the hotel their usual place of residence; quarters in institutions, general hospitals, and military installations, except those occupied by staff members or resident employees who have separate living arrangements.

Student/University Housing: Please be aware, college and university student housing may be considered noninstitutional group quarters and not a housing unit for purposes of meeting the RHNA. According to the census, college/university student housing includes residence halls and other buildings, including apartment-style student housing, designed primarily to house college and university students in group living arrangements either on or off campus. These facilities are owned, leased, or managed by a college, university, or seminary or can be owned, leased, or managed by a private company or agency. Residents typically enter into "by the bed" leases (i.e., single-liability leases). Another distinguishing factor is that the unit is not available for rent to non-students. For further information on whether university housing meets the definition of a housing unit, please contact the Department of Finance at (916) 323-4086.

Exempt entity-controlled sites (state excess sites, military, university, and tribal land)

HCD recognizes that the development of new housing on exempt entity sites (land controlled by exempt federal, state, or tribal entities) can meet a portion of a jurisdiction's RHNA. However, sites located on land controlled by exempt entities are analyzed differently because the jurisdiction may not have control over the planning, permitting, and decision-making processes of land owned by another public entity.

Sites controlled by exempt entities can be used to accommodate RHNA when documentation can be provided that demonstrates the likelihood that the planned housing will be developed within the current RHNA/housing element cycle. Adequate documentation can vary due to differences in the planning processes on land controlled by exempt federal, state, or tribal entities. The following are examples of documentation that demonstrates the likelihood of housing being developed on sites outside the control of a local government. In each of these examples, the units would have to meet the U.S. Census Bureau (Census) definition of a housing unit:

- Agreement with the entity controlling the land that grants the jurisdiction authority regarding approving, permitting, certifying occupancy, and/or reporting new units to the California Department of Finance.
- Documentation from the entity controlling the land that demonstrates planned housing has been approved to be built within the current RHNA cycle.
- Data pertaining to the timing of project construction and unit affordability by household income category.
- If the site is listed on the Department of General Services Real Estate Excess State Property map located EO N-06-19 Affordable Housing Development webpage.

Step 2: Inventory of Sites
Government Code section 65583.2(b)

Provide a parcel specific inventory of sites that includes the following information for each site:

- ***NEW*** Assessor parcel number(s).
- Size of each parcel (in acres).
- General plan land use designation.
- Zoning designation.
- For nonvacant sites, a description of the existing use of each parcel (See Part D)
- ***NEW*** Whether the site is publicly owned or leased.
- Number of dwelling units that the site can realistically accommodate (See Part C)
- ***NEW*** Whether the parcel has available or planned and accessible infrastructure (Part A: Step 3).
- ***NEW*** The RHNA income category the parcel is anticipated to accommodate (See Part A: Step 5).
- ***NEW*** If the parcel was identified in a previous planning period site inventory (Part B: Step 1).

NEW Please note pursuant to Chapter 667, Statutes of 2019 (SB 6), the site inventory must be prepared using the standards, form, and definitions adopted by HCD. HCD has prepared a form and instructions for this purpose that includes space for the information above and commonly provided optional fields. Starting January 1, 2021, local governments will need to submit an electronic version of the site inventory to HCD on this form along with its adopted housing element.

NEW Pursuant to Chapter 664, Statutes of 2019 (AB 1486), at Government Code section 65583.2(b)(3), if a site included in the inventory is owned by the city or county, the housing element must include a description of whether there are any plans to sell the property during the planning period and how the jurisdiction will comply with the Surplus Land Act Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.

Step 3: Infrastructure Availability
Government Code section 65583.2(b)(5)(B)

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer, and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program or plan, including a program or plan of a public or private entity to secure sufficient water, sewer, and dry utilities supply to support housing development on the site in time to make housing development realistic during the planning period. Dry utilities include, at minimum, a reliable energy source that supports full functionality of the

home and could also include access to natural gas, telephone and/or cellular service, cable or satellite television systems, and internet or Wi-Fi service.

If Yes: Provide an analysis in the housing element describing existing or planned water, sewer, and other dry utilities supply, including the availability and access to parcels on the site inventory, distribution facilities, general plan programs or other mandatory program or plan (including a program or plan of a public or private entity to secure water or sewer service) to support housing development on the site. The housing element must include sufficient detail to determine whether the service levels of water delivery/treatment systems and sewer treatment facilities are sufficient and have the capacity to accommodate development on all identified sites in order to accommodate the RHNA. For example, the water supply should be a reliable supply that meets federal and state drinking water standards.

Please note sites identified as available for housing for above moderate-income households can still be in areas not served by public sewer systems.

If No: Include a program in the housing element that ensures access and availability to infrastructure to accommodate development within the planning period. If this is not possible, the site is not suitable for inclusion in the site inventory or in a program of action identifying a site for rezoning.

Step 4: Map of Sites
Government Code section 65583.2(b)(7)

Provide a map that shows the location of the sites included in the inventory. While the map may be on a larger scale, such as the land use map of the general plan, the more detailed the map, the easier it will be to demonstrate the sites meet new requirements pursuant to Chapter 958, Statutes of 2018 (AB 686) as stated below.

Step 5: Determination of Consistency with Affirmatively Furthering Fair Housing
Government Code section 65583.2(a)

NEW Pursuant to AB 686, for housing elements due on or after January 1, 2021, sites must be identified throughout the community in a manner that affirmatively furthers fair housing opportunities (Government Code Section 65583(c)(10)).

Affirmatively Furthering Fair Housing means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency's[3]

[3] Public Agencies include the state, including every state office, officer, department, division, bureau, board, and commission, including the California State University, a city, including a charter city, county, including a charter county, city and county, and a redevelopment successor agency, a public housing authority created pursuant to the Housing Authorities Law, a public housing agency, and any other political subdivision of the state that is a grantee or subgrantee receiving funds provided by the United States Department of Housing and Urban Development (Government Code section 8899.5(a)(2)

activities and programs relating to housing and community development." (Government Code section 8899.50(a)(1)).

For purposes of the housing element site inventory, this means that sites identified to accommodate the lower-income need are not concentrated in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Instead, sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing. One resource the jurisdiction could use when completing this analysis is the California Tax Credit Allocation/California Department of Housing and Community Development Opportunity Maps, which can be accessed at https://www.treasurer.ca.gov/ctcac/opportunity.asp. Particularly, the jurisdiction should consider the barriers and opportunities identified in its assessment of fair housing pursuant to Government Code section 65583(c)(10). HCD plans to release a technical assistance memo to assist jurisdictions in addressing AB 686 requirements in their housing element in the Summer of 2020.

Jurisdictions should also consider integrating this analysis with the requirements of Government Code 65302(h), as added by SB 1000 (Statutes of 2016), which requires the preparation and adoption of an Environmental Justice element or equivalent environmental justice-related policies, objectives, and goals throughout other elements of their general plan, to address the needs of disadvantaged communities. More information on Environmental Justice elements can be found on the Governor's Office of Planning and Research Website.

Step 6: Sites by RHNA Income Category
Government Code section 65583.2(c)

NEW Identify which RHNA income category that each site in the inventory is anticipated to accommodate. On the site inventory, specify whether the site or a portion of the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing. Sites can accommodate units for more than one income category. However, the inventory should indicate the number of units of each income category, and together the total of units attributed to each income category may not exceed total units attributed to the site, so that no unit is designated for more than one income category. This requirement is particularly important because the No Net Loss Law (Government Code section 65863) requires adequate sites be maintained throughout the planning period to accommodate the remaining RHNA by income category. For more information, please consult the HCD's memo on No Net Loss Law.

HCD Best Practices for selecting sites to accommodate the lower income RHNA:
When determining which sites are best suited to accommodate the RHNA for lower income households, the jurisdiction should consider factors such as:

- Proximity to transit.
- Access to high performing schools and jobs.
- Access to amenities, such as parks and services.
- Access to health care facilities and grocery stores.
- Locational scoring criteria for Low-income Housing Tax Credit (TCAC) Program funding.
- Proximity to available infrastructure and utilities.

- Sites that do not require environmental mitigation.
- Presence of development streamlining processes, environmental exemptions, and other development incentives.

Step 7: Environmental Constraints
Government Code section 65583.2(b)(4)

Provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites. The housing element need only describe those environmental constraints where documentation of such conditions is available to the local government. This analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities. This information need not be identified on a site-specific basis. However, local governments will find it beneficial to describe site specific environmental conditions when demonstrating site suitability and realistic buildout capacity of each site, as these types of impediments to building must be considered when determining how many residential units can be developed on the site.

NEXT STEP:

- If the site is selected to accommodate its low or very-low income RHNA, move to Part B: Sites to Accommodate Low and Very-Low Income RHNA.
- If the site accommodates moderate or above-moderate RHNA, move to Part C: Capacity Analysis.

PART B: SITES TO ACCOMMODATE LOW AND VERY LOW- INCOME RHNA

Step 1: *NEW* Sites Used in Previous Planning Periods Housing Elements
Government Code section 65583.2(c)

Determine if the site identified to accommodate the low- and very low-income RHNA pursuant to Part A, Step 6 was used in the previous planning period[4]. Generally, previously identified sites refer to parcels that were identified in a previous housing element's site inventory to accommodate any portion of any income category of the jurisdiction's RHNA, as follows:

For a nonvacant site: Included in a prior planning period's housing element (e.g., 5th cycle housing element)

For a vacant site (see definition of vacant site on page 21): Included in two or more consecutive planning periods (e.g., 5th cycle and 4th cycle housing element)

If Yes: move to Step 1A

If No: move to Step 2

Unusual Circumstances

Sites rezoned or identified for rezoning to accommodate a RHNA shortfall
Previously identified sites can also include sites that were subject to a previous housing element's rezone program but that were ultimately not rezoned. For example: a previous housing element's rezone program to address a shortfall of sites for lower income households committed to rezone four acres to R-4 zoning, and identified five candidate sites for rezoning, A through E, and each site was two acres in size. If the program was completed in the prior planning period and four acres were rezoned, only those sites rezoned are considered "previously identified." However, if none or fewer than four acres were rezoned, all the non-rezoned sites identified as candidate sites would be considered as "previously identified."

Sites rezoned to a higher density as part of a general plan update (not needed to accommodate a shortfall)
Due to updates in the prior planning period to the general plan or other planning activities, such as the creation of a specific plan, some sites previously identified in the housing element may have been rezoned allowing a higher density, and therefore increasing the potential housing capacity of the site. Because the zoning characteristics of this site have changed, it can be considered a new site for the purposes of the housing element inventory. This is only the case if it was not utilized to accommodate a shortfall of sites to accommodate the RHNA.

[4] Sites in unincorporated areas in a nonmetropolitan county without a micropolitan area are exempt from this step. This includes the unincorporated parts of Alpine, Amador, Calaveras, Colusa, Glenn, Mariposa, Modoc, Mono, Plumas, Sierra, Siskiyou, Trinity.

Step 1A:
Indicate in the housing element site inventory that this parcel was used in a prior housing element planning period.

Step 1B:
Include a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by right at specified densities (see Step 2) for housing developments in which at least 20 percent of the units are affordable to lower income households. This program can be an overlay on these specific sites. Please be aware that the intent of this requirement is to further incentivize the development of housing on sites that have been available over one or more planning periods. The application of the requirement should not be used to further constrain the development of housing. As such, housing developments that do not contain the requisite 20 percent would still be allowed to be developed according to the underlying (base) zoning but would not be eligible for "by right" processing. However, the jurisdiction would have to make findings on the approval of that project pursuant to No Net Loss Law (Government Code section 65863) and proceed to identify an alternative site or sites pursuant to that law. Sites where zoning already permits residential "use by right" as set forth in Government Code section 65583.2 (i) at the beginning of the planning period would be considered to meet this requirement.

Definition of Use By Right (Government Code section 65583.2 (i))

By right means the jurisdiction shall not require:

- A conditional use permit.
- A planned unit development permit.
- Other discretionary, local-government review or approval that would constitute a "project" as defined in Section 21100 of the Public Resources Code (California Environmental Quality Act "CEQA").

However, if the project requires a subdivision, it is subject to all laws, including CEQA.

This does not preclude a jurisdiction from imposing objective design review standards. However, the review and approval process must remain non discretionary and the design review must not constitute a "project" as defined in Section 21100 of the Public Resources Code. For example, a hearing officer (e.g., zoning administrator) or other hearing body (e.g., planning commission) can review the design merits of a project and call for a project proponent to make design-related modifications, but cannot exercise judgment to reject, deny, or modify the "residential use" itself. (See *McCorkle Eastside Neighborhood Group v. City of St. Helena* (2019) 31 Cal.App.5th 80.)

For reference, CEQA applies when a governmental agency can exercise judgment in deciding whether and how to carry out or approve a project. This makes the project "discretionary" (CEQA Guidelines, §15357.) Where the law requires a governmental agency to act on a project using fixed standards and the agency does not have authority to use its own judgment, the project is called "ministerial," and CEQA does not apply. (CEQA Guidelines, §§ 15268(a), 15369.)

Sample Program:
Provide Adequate Sites for Lower Income Households on Nonvacant and Vacant Sites Previously Identified

The City of X will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower income households on sites identified in Table A to accommodate the lower income RHNA that was previously identified in past housing elements. Specifically, the City will rezone the nonvacant sites identified on Table A previously identified in the 5th cycle housing element, and the vacant sites identified on Table A as previously identified for both the 5th and 4th cycle housing elements.

Objective: Create opportunity for at least X units of rental housing for lower income households

Responsible Agency: Community Development Department

Timeline: Sites rezoned by (a specific date, no more than three years from the beginning of the planning period)

Funding Source(s): General fund

Step 2: Zoning Appropriate to Accommodate Low- and Very Low- Income RHNA
Government Code section 65583.2(c)(3)

Determine if the zoning on the site is appropriate to accommodate low- and very low-income (termed together as "lower") housing.

The statute allows jurisdictions to use higher density as a proxy for lower income affordability, as long as certain statutory requirements are met. Parcels must be zoned to allow sufficient density to accommodate the economies of scale needed to produce affordable housing. To make this determination, the statute allows the jurisdiction to either demonstrate that the zoning allows a specific density set forth in the statute (default density)[5] or to provide an analysis demonstrating the appropriateness of the zoned densities of the site identified to accommodate the lower RHNA.

Step 2A: Does the parcel's zoning allow for "at least" the following densities?

- For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre.
- For an unincorporated area in a nonmetropolitan county not included in the first bullet: sites allowing at least 10 units per acre.
- For a suburban jurisdiction: sites allowing at least 20 units per acre.
- For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.

"At least" means the density range allowed on the parcel by the zone has to include the default density. For example, if a jurisdiction has a default density of 30 units per acre and the zone allows for range of 24 – 35 units per acre, the zoning is considered appropriate to accommodate the RHNA for lower income households. This is different than the program standard outlined in Part E which requires a minimum of a specific density in the allowed

[5] Sometimes called "Mullin densities" after the author of AB 2348, Statutes of 2004, which originated these requirements.

density range in the zone. To determine the default density for jurisdictions, please refer to HCD Memorandum: Default Density Standard Option (2010 Census Update).

If Yes: Move to Step 3

If No: Move to Step 2B

Step 2B: Can the analysis demonstrate the appropriateness of the zoning to accommodate housing?

Provide an analysis demonstrating how the allowed densities facilitate the development of housing to accommodate the lower income RHNA. The analysis shall include, but is not limited to, factors such as market demand, financial feasibility, and information based on development project experience within a zone or zones, or at densities that accommodate housing for lower income households.

Information gathered from local developers on densities ideal for housing development in the community and examples of recent residential projects that provide housing for lower income households is helpful in establishing the appropriateness of the zone. Other information could include land costs, market demand for various types of affordable housing, and the gap between typical market rents and subsidized rents. It is recognized that housing affordable to lower income households requires significant subsidies and financial assistance. However, for this analysis, identifying examples of subsidized housing projects alone is not sufficient to demonstrate the adequacy of a zone and/or density to accommodate the housing affordable to lower income households. In particular, identification of older project(s) or one-off projects that cannot be easily duplicated is not sufficient to demonstrate a development trend.

The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility.

If Yes: Move to Step 3

If No: Site is not appropriate to accommodate lower income. Reclassify pursuant to Part A, Step 5.



Housing Overlays

Affordable housing or zoning overlays are a zoning tool that allows jurisdictions to modify existing zoning to allow for or require certain types of residential development, or development at certain densities, on a parcel without modifying the standards of the underlying zoning district. Usually, they have specific requirements and conditions (e.g., a percentage of the development must be deed-restricted as affordable to lower income households for a specific number of years) that must be met in order for a developer to take advantage of the overlay. These are often combined with incentives to encourage developers to utilize the overlay. Jurisdictions use overlays to help promote a specific type of development, and to increase densities without having to go through a rezoning procedure on the actual parcel and can be more useful when issues such as density and affordable housing become contentious. To ensure the overlay is considered zoning and not just a development incentive, the overlay must demonstrate the following:

- There is no additional discretionary action needed above what is required in the base zone (i.e., a conditional use permit or other review) for a developer to take advantage of overlay.
- Development standards are consistent with those needed to allow for the density allowed under the overlay. Development standards for use exclusively in the overlay may be needed in order to ensure maximum allowable densities can be achieved.
- The developer can access State Density Bonus Law in addition to using the densities allowed in the overlay. For example, if the underlying zoning allows a maximum density of 15 units per acre, but the overlay allows a maximum density of 25 units per acre, and if the developer is using the overlay and wants to use State Density Bonus Law, the density bonus is calculated assuming the base density is 25 units per acre.

If the overlay has conditions such as an affordability requirement, incentives should be sufficient and available to make development feasible and more profitable than the underlying zoning.

For an affordable housing overlay, the element should describe affordability threshold requirements to utilize the overlay (i.e., percentage of units and levels of affordability which must be met to develop at the increased densities). Please note, the jurisdiction should talk with for-profit and nonprofit developers to determine an appropriate mix of incomes that make development feasible in their community. For example, a 100 percent affordability requirement may act as a constraint to using the overlay depending on the level of subsidy required per unit and the availability of funding to support the level of affordability or available incentives.

Step 3: Size of Sites
Government Code section 65583.2(c)(2)(A), (B), and (C)

NEW Is the size of the site appropriate to accommodate housing for lower income households?

To achieve financial feasibility, many assisted housing developments using state or federal resources are between 50 to 150 units. Parcels that are too small may not support the number of units necessary to be competitive and to access scarce funding resources. Parcels that are large may require very large projects, which may lead to an over concentration of affordable housing in one location, or may add cost to a project by

requiring a developer to purchase more land than is needed, or render a project ineligible for funding. If the size of the site is smaller than one half acre or larger than 10 acres, the following analysis is required.

If the parcel is more than 0.5 acres or less than 10 acres, is the size of the site automatically considered appropriate to accommodate lower income RHNA?

Not necessarily. If the size of the parcel in combination with the allowable density and accompanying development standards cannot support a housing development affordable to lower income households, further analysis and programs may be needed to demonstrate the suitability of that site to accommodate the portion of the RHNA for lower income households.

Is the size of the parcel under 0.5 acres?
If Yes: Move to Step 3A

Is the size of the parcel over 10 acres?
If Yes: Move to Step 3B

If No to Both: Move to Part C: Capacity Analysis

Step 3A: Sites smaller than 0.5 acres
A parcel smaller than one half acre is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible. While it may be possible to build housing on a small parcel, the nature and conditions (i.e., development standards) necessary to construct the units often render the provision of affordable housing infeasible. The housing element must consider and address the impact of constraints associated with small lot development on the ability of a developer to produce housing affordable to lower income households. To demonstrate the feasibility of development on this type of site, the analysis must include at least one of the following:

- An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.
- Evidence that the site is adequate to accommodate lower income housing. Evidence could include developer interest, potential for lot consolidation, densities that allow sufficient capacity for a typical affordable housing project, and other information that can demonstrate to HCD the feasibility of the site for development. For parcels anticipated to be consolidated, the housing element must include analysis describing the jurisdiction's role or track record in facilitating small lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for consolidation such as common ownership, and recent trends of lot consolidation. The housing element should include programs promoting, incentivizing, and supporting lot consolidations and/or small lot development.
- A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

The housing element must also describe existing and proposed policies or incentives the jurisdiction will offer to facilitate development of small sites. Examples of program incentives for lot consolidation include deferring fees specifically for consolidation, expediting permit processing, providing flexible development standards such as setback requirements, reduced parking or increased heights, committing resources for development of affordable housing on small sites, or increasing allowable density, lot coverage or floor area ratio.

Step 3B: Sites larger than 10 acres
Parcels larger than 10 acres are considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on such sites was successful during the prior planning period, or there is other evidence that the site is realistic and feasible for lower income housing.

Definition of a Large Site

For purposes of this requirement, "site" means that portion of the parcel designated to accommodate lower income housing needs. For example, a parcel greater than 10 acres in size could have to be split zoned, have an overlay zone with identified boundaries, or be identified in a specific plan that provides for subdivision of the parcel. If the specified boundaries of the site identified to accommodate the RHNA for lower income is less than 10 acres in size, then the large site analysis would not be required. However, the analysis must describe how the development will work on the site, including opportunities and timing for specific-plan development, further subdivision, or other methods to facilitate the development of housing affordable to lower income households on the identified site within the planning period.

To demonstrate the feasibility of development on this type of site, the analysis must include at least one of the following:

- An analysis demonstrating that sites of equivalent size were successfully developed during the prior planning period with an equivalent number of lower income housing units as projected for the site.
- Evidence that the site is adequate to accommodate lower income housing. Evidence may include developer interest, proposed specific-plan development, potential for subdivision, the jurisdiction's role or track record in facilitating lot splits, or other information that can demonstrate to HCD the feasibility of the site for development. The housing element should include programs promoting, incentivizing, and supporting lot splits and/or large lot development.
- A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

Specific Plans, Master Plan, and other Subdivisions

To utilize residential capacity in Specific Plan areas, areas under a Master Plan, or a similar multi-phased development plan, the housing element must identify specific sites by parcel number and demonstrate that the sites are available and suitable for development within the planning period. The analysis should include the following information:

- Identify the date of approval of the plans and expiration date.
- Identify approved or pending projects within these plans that are anticipated in the planning period, including anticipated affordability based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project.
- Describe necessary approvals or steps for entitlements for new development (e.g., design review, site plan review, etc.).
  Describe any development agreements, and conditions or requirements such as phasing or timing requirements, that impact development in the planning period.

The housing element must also describe existing and proposed policies or incentives the jurisdiction will offer to facilitate development of large sites. Examples of facilitation include expedited or automatic approval of lot splits or creation of new parcels, waivers of fees associated with subdivision, or expedited processing or financial assistance with the development of infrastructure required to develop the site.

NEXT STEP:

- Move to Part C: Capacity Analysis

PART C: CAPACITY ANALYSIS

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to calculate the projected residential development capacity of the sites identified in the housing element that can be realistically be achieved. The housing element must describe the methodology used to make this calculation. Jurisdictions have two options to make this calculation.

- Utilize minimum densities (Step 1)
- Utilize adjustment factors (Step 2)

Step1: Utilizing minimum densities to calculate realistic capacity of sites
Government Code section 65583.2(c)(1)

If the jurisdiction has adopted a law, policy, procedure, or other regulation that requires the development of a site to contain at least a certain minimum residential density, the jurisdiction can utilize that minimum density to determine the capacity of a site. For purposes of this analysis, the use of either gross or net acreage is acceptable but should be consistent with the standard the jurisdiction typically uses for determining allowable units for a residential development project. For example:

Site Description	Value
Size of site (Gross acreage)	3 acres
Zoning	Residential Multifamily
Allowable density	20 (required minimum) – 30 dwelling units per acre
Realistic capacity utilizing minimum	**3 X 20 = 60 units**

Please note, to meet this standard on a zone that allows for multiple uses, the general plan or zoning must require the specified minimum number of residential units on the identified sites regardless of overlay zones, zoning allowing nonresidential uses, or other factors potentially impacting the minimum density. Otherwise, the capacity of the site must be calculated using the factors outlined in Step 2.

Step 2: Utilizing factors to calculate realistic capacity of sites
Government Code section 65583.2(c)(2)

The housing element must describe the methodology used to determine the number of units calculated based on the following factors:

- Land use controls and site improvements requirements,
- ***NEW*** The realistic development capacity for the site,
- ***NEW*** Typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction,
- ***NEW*** The current or planned availability and accessibility of sufficient water, sewer, and dry utilities.

Applicable land-use controls and site improvement requirements
The analysis must consider the imposition of any development standards that impact the residential development capacity of the sites identified in the inventory. When establishing realistic unit capacity calculations, the jurisdiction must consider the cumulative impact of standards such as maximum lot coverage, height, open space, parking, on-site improvements such as sidewalks or easements, and floor area ratios. The analysis should consider any development standards or the cumulative effect of development standards that would limit the achievable density on a site. For example, if a mixed-use zone requires commercial on the ground floor and has a height limit of three stories along with lot coverage and other development standards, the density that can actually be achieved on that site might be less than the maximum allowable density.

The capacity of a site should also be adjusted for areas that cannot be developed due to environmental factors such as hazards, wetlands, or topography that cannot be mitigated. The capacity of sites subject to specific plans, overlays or other modifications of the base zoning should be adjusted to reflect those factors. For purposes of this analysis, it is recommended that the jurisdiction start with the gross acreage and adjust the buildable acreage accordingly to reach net buildable acreage.

Form Based Codes

To estimate capacity for sites in jurisdictions that have adopted form-based codes, the element should describe the relationship between general plan land-use designation and the form-based code and density assumptions used to determine capacity. Specifically, describe where residential development is allowed, how density requirements found within the general plan are incorporated, how the zoning designations under the form-based code relate to the land-use designations of the general plan, identify potential densities, and consider development standards such as bulk, height, and build-to requirements, buildings types, and use requirements. The element could include examples of recently built projects and densities to support the analysis.

Realistic development capacity for nonresidential, nonvacant, or overlay zoned sites
The capacity calculation must be adjusted to reflect the realistic potential for residential development capacity on the sites in the inventory. Specifically, when the site has the potential to be developed with nonresidential uses, requires redevelopment, or has an overlay zone allowing the underlying zoning to be utilized for residential units, these capacity limits must be reflected in the housing element. Factors used to make this adjustment may include the following:

- Performance standards mandating a specified portion of residential development in mixed use or nonresidential zones (e.g., residential allowed only above first floor commercial).
- The likelihood for residential development such as incentives for residential use, market demand, efforts to attract and assist developers, or allowance of 100 percent residential development.
- Local or regional residential development trends in the same nonresidential zoning districts.
- Local or regional track records, past production trends, or net unit increases/yields for redeveloping sites or site intensification. This estimate may be based on the rate at which similar parcels were developed during the previous planning period, with

adjustments as appropriate to reflect new market conditions or changes in the regulatory environment. If no information about the rate of development of similar parcels is available, report the proportion of parcels in the previous housing element's site inventory that were developed during the previous planning period. For example, if past production trends indicate that two out of three similar sites were developed for residential use, and one out of three similar sites was developed for commercial use, an initial estimate of the proportion of new development which is expected to be residential would be two-thirds, i.e., 0.67.

- Local or regional track records, trends, or build out yields for redeveloping sites or site intensification.

In addition, the housing element should include monitoring programs with next-step actions to ensure sites are achieving the anticipated development patterns. The programs should identify modifications to incentives, sites, programs, or rezoning the jurisdiction will take should these strategies not yield the expected housing potential.

Typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction

While using typically built densities to determine realistic capacity has long been an option to be used as an adjustment factor, the statute now requires this factor to be adjusted based on approved project by affordability level. For example, if a site is identified to accommodate the lower income RHNA, it should use project densities for housing affordable to lower income households developed either locally or regionally to determine typical densities[6]. Using this adjustment factor may result in utilizing different capacity methodologies for above moderate-, moderate-, and lower income sites.

Current or planned availability and accessibility of sufficient water, sewer, and dry utilities

The capacity methodology must be adjusted to account for any limitation as a result of availability and accessibility of sufficient water, sewer, and dry utilities (i.e., if the capacity of the site could be limited because a development would have to use a septic system, if there are any septic tank requirements or restrictions that constrain capacity, or limitations on water hook-ups). See Part A, Step 3 for more information on infrastructure requirements.

Example Capacity Calculation

Here is an example of the actual capacity calculation for a particular site in the inventory. The methodology analysis must describe how each of these adjustments was generated per the analysis requirements above. The factors used below are based on the factors outlined in the statute. The percentages and how the factors are applied will vary depending on the unique circumstance in each jurisdiction.

[6] In using this adjustment factor, because of the use of density bonus, it may be possible that trends demonstrate typical densities higher than the maximum allowable densities, especially for housing affordable to lower income households. On a case-by-case basis, it may be appropriate to utilize increased densities due to density bonuses when determining the adjustment factor in the capacity methodology.

Site Description	
Size of site	2.5 acres
Zoning	Residential Mixed-Use
Allowable density	20 – 45 dwelling units per acre
RHNA affordability	Lower income
Existing Use	Nonvacant, single storefront
Infrastructure availability	Yes, no constraints
Environmental constraints	None known

Capacity Factors	Adjustment	Reasoning
Land Use Controls and Site Improvements	95%	For net acreage due to on-site improvements including sidewalks, utility easement
Realistic capacity of the site	55%	55% adjustment based on past development trends for residential redevelopment in the residential mixed-use zones, and programs to incentivize development in this zone.
Typical densities	95%	Affordable housing projects are built out to almost maximum density
Infrastructure availability	No adjustment	Not applicable, no constraint
Environmental constraints	No adjustment	No known site constraint

Realistic capacity utilizing factors = (2.5 X 45)(.95)(.55)(.95) = 56 units

Realistic Capacity = 56 Units

No Net Loss Law

In estimating realistic capacity on sites in the sites inventory, jurisdictions may want to consider No Net Loss Law. This law was amended by Chapter 367, Statutes of 2017 (Senate Bill 166), which requires sufficient adequate sites to be available at all times throughout the RHNA planning period to meet a jurisdiction's remaining unmet housing needs for each income category. To comply with the No Net Loss Law, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites according to the No Net Loss Law if a jurisdiction rezones a site or if the jurisdiction approves a project at a different income level than shown in the sites inventory. Lower density means fewer units than the capacity assumed in the site inventory.

To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, it is recommended the jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower income RHNA. Jurisdictions can also create a buffer by projecting site capacity at less than the maximum density to allow for some reductions in density at a project level.

NEXT STEP:

- If the parcel is nonvacant, including underutilized sites (see definition of vacant site on page 22), move to Part D: Nonvacant Sites Analysis
- If not, move to Part E: Determination of Adequate Sites

PART D: NONVACANT SITES

Local governments with limited vacant land resources or with infill and reuse goals may rely on the potential for new residential development on nonvacant sites, including underutilized sites, to accommodate their RHNA. Examples include:

- Sites with obsolete uses that have the potential for redevelopment, such as a vacant restaurant.
- Nonvacant publicly owned surplus or excess land; portions of blighted areas with abandoned or vacant buildings.
- Existing high opportunity developed areas with mixed-used potential.
- Nonvacant substandard or irregular lots that could be consolidated.
- Any other suitable underutilized land.

Local governments can meet other important community objectives to preserve open space or agricultural resources, as well as assist in meeting greenhouse gas emission-reduction goals, by adopting policies to maximize existing land resources and by promoting more compact development patterns or reuse of existing buildings.

Definition of a Vacant Site

A vacant site is a site without any houses, offices, buildings, or other significant improvements on it. Improvements are generally defined as development of the land (such as a paved parking lot, or income production improvements such as crops, high voltage power lines, oil-wells, etc.) or structures on a property that are permanent and add significantly to the value of the property.

Examples of Vacant Sites:

- No improvement on the site (other than being a finished lot).
- No existing uses, including parking lots.
- Underutilized sites are not vacant sites.
- Sites with blighted improvements are not vacant sites.
- Sites with abandoned or unoccupied uses are not vacant sites.

If the inventory identifies nonvacant sites to address a portion of the RHNA, the housing element must describe the realistic development potential of each site within the planning period. Specifically, the analysis must consider the extent that the nonvacant site's existing use impedes additional residential development, the jurisdiction's past experience converting existing uses to higher density residential development, market trends and conditions, and regulatory or other incentives or standards that encourage additional housing development on the nonvacant sites.

Step 1: Description of the nonvacant site
Government Code Section 65583.2(b)

As stated in Part A, the site inventory must describe the specific existing use on the site, such as a surplus school site, auto shop, restaurant, single family residence, nursery, etc. Additional details, such as whether the use is discontinued, land to value information, age and condition of the structure, known leases, developer or owner interest, whether the property is currently being marketed, degree of underutilization, etc., are useful for demonstrating the potential for the site to be redeveloped within the planning period (See Step 2).

Step 2: Nonvacant site analysis methodology
Government Code section 65583.2(g)(1)

Provide an explanation of the methodology used to determine the development potential. This methodology can be done on a site-specific basis by utilizing factors (e.g., common ownership, valuation, age, etc.) in common that demonstrate the potential for residential development within the planning period, or a combination of both approaches. The methodology shall consider factors including:

Existing Uses:
Include an analysis that demonstrates the extent to which existing uses may constitute an impediment to additional residential development. Among other things, this analysis includes considerations for the current market demand for the existing use, ***NEW*** an analysis of any known existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, and could include other market conditions that would encourage redevelopment of the property. For example, an analysis might describe an identified site as being developed with a 1960's strip commercial center with few tenants and expiring leases and, therefore, a good candidate for redevelopment, versus a site containing a newly opened retail center, an active Home Depot, the only grocery store in the city, etc. that is unlikely to be available for residential development within the planning period.

Development Trends:
The inventory analysis should describe development and/or redevelopment trends in the community as it relates to nonvacant sites, i.e., the rate at which similar sites have been redeveloped. This could include a description of the local government's track record and specific role in encouraging and facilitating redevelopment, adaptive reuse, or recycling to residential or more intensive residential uses. If the local government does not have any examples of recent recycling or redevelopment, the housing element should describe current or planned efforts (via new programs) to encourage and facilitate this type of development (e.g., providing incentives to encourage lot consolidation or assemblage to facilitate increased residential-development capacity). The results of the analysis should be reflected in the capacity calculation described in Part C, above.

Market Conditions:
Housing market conditions also play a vital role in determining the feasibility or realistic potential of nonvacant sites for residential development. The nonvacant sites analysis should include an evaluation of the impact of local market conditions on redevelopment or reuse strategies. For example, high land and construction costs, combined with a limited supply of available and developable land, may indicate conditions "ripe" for more intensive, compact and infill development or redevelopment and reuse.

Availability of Regulatory and/or other Incentives:
The analysis should describe existing or planned financial assistance, incentives or regulatory concessions to encourage residential development on nonvacant sites. Many local governments develop partnerships with prospective developers to assist in making redevelopment/reuse economically feasible. Examples of these incentives include:

- Organizing special marketing events geared towards the development community.
- Identifying and targeting specific financial resources.
- Allowing streamlined or by right development application processing for infill sites.
- Reducing appropriate development standards.

Absent a track record or development trends to demonstrate the feasibility of a recycling or redevelopment strategy, the housing element should describe existing or planned financial assistance or regulatory relief from development standards that will be provided sufficient to encourage and facilitate more intensive residential development on the identified nonvacant sites.

Step 3: *NEW* Reliance on nonvacant sites to accommodate more than 50 percent of the RHNA for lower income households
Government Code Section 65583.2(g)(2)

Determine if more than 50 percent of the lower income RHNA is on nonvacant sites.

- Calculate the sum of lower income RHNA capacity on vacant sites and other alternatives not related to capacity on nonvacant sites (e.g., accessory dwelling units, vacant sites to be rezoned (see Part E)).
- Subtract that sum from the total lower income RHNA to get the amount of RHNA needed to be accommodated on nonvacant sites.
- Determine if this number is greater than 50 percent of the RHNA.

Example calculation for a jurisdiction with a lower income RHNA of 500:

Adjustment Factor	Number of units
Proposed Lower Income Project	50
Accessory Dwelling Unit Capacity (affordable to lower)	15
Capacity on Vacant Sites	100
Total Capacity (not related to non-vacant sites)	165
RHNA on Nonvacant sites	500 - 165 = 335
Percentage of Lower Income RHNA accommodated on Nonvacant sites	**335/500 = 77%**

If Yes: Move to Step 3A

If No: Move to Step 4

Step 3A:
If a housing element relies on nonvacant sites to accommodate 50 percent or more of its RHNA for lower income households, the nonvacant site's existing use is presumed to impede additional residential development, unless the housing element describes findings based on substantial evidence that the use will likely be discontinued during the planning period. The housing element must include the following:

- As part of the resolution adopting the housing elements, findings stating the uses on nonvacant sites identified in the inventory to accommodate the RHNA for lower income is likely to be discontinued during the planning period and the factors used to make that determination. This can be included in the body or in the recital section of the resolution.

  Example: WHEREAS, based on <name factors here (e.g., expiring leases, dilapidated building conditions, etc.)>, the existing uses on the sites identified in the site inventory to accommodate the lower income RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the housing element.

- The housing element should describe the findings and include a description of the substantial evidence they are based on.

  In general, substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. An example of substantial evidence would be a nonvacant site with a grocery store and with a building lease expiring in a year, and evidence that the store has entered into a lease to relocate to another site subsequent to the lease expiring.

  Examples of substantial evidence that an existing use will likely be discontinued in the current planning period include, but are not limited to:

  - The lease for the existing use expires early within the planning period,
  - The building is dilapidated, and the structure is likely to be removed, or a demolition permit has been issued for the existing uses,
  - There is a development agreement that exists to develop the site within the planning period,
  - The entity operating the existing use has agreed to move to another location early enough within the planning period to allow residential development within the planning period.
  - The property owner provides a letter stating its intention to develop the property with residences during the planning period.

  If multiple sites make up a common existing use and the same factors affect each of the sites, the same findings can be used for each of the sites (e.g., an abandoned shopping mall with sites under common ownership that will not be restored to commercial use located in an area where there is recent residential development). The "substantial evidence" would indicate the existing use will not impede further residential development or that the existing use will be discontinued during the planning period. In this type of situation, use of the same findings for each of the multiple sites would be appropriate.



However, the same finding for multiple sites in a specific area may not be appropriate if their characteristics widely vary. For example, nonvacant sites with differing existing uses and lacking in common ownership, whether contiguous or located in the same general area, may not rely on a generalized analysis. While the sites may be located in an area with common economic issues, individual owners may not wish to sell their property or redevelop their site with residential uses. In addition, each site's existing use, e.g., grocery store, retail shop, parking lot, and offices, may have lease agreements of different lengths of time or the owner may not wish to relocate or redevelop the site with a more intensive residential use. In this type of situation, use of the same findings for the multiple sites would not be appropriate.

Step 4: *NEW* Program and policy requiring replacement of existing affordable units
Government Code Section 65583.2(g)(3)

The housing element must include a program in the housing element and policy independent of the housing element requiring the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in Density Bonus Law (Government Code section 65915(c)(3).) Replacement requirements shall be required for sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power, or
- Occupied by low or very low-income households

For the purpose of this program "previous five years" is based on the date the application for development was submitted.

Please note, until 2025, pursuant to Government Code section 66300(d) (Chapter 654, Statutes of 2019 (SB 330)), an affected city or county shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the inventory unless a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met. A listing of affected cities and counties can be found at https://www.hcd.ca.gov/community-development/accountability-enforcement/statutory-determinations.shtml.

SAMPLE PROGRAM

Program X: Replacement Unit Program

XXXX will adopt a policy and will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions:

- currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and
- was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or
- subject to any other form of rent or price control through a public entity's valid exercise of its police power, or
- occupied by low or very low-income households

Funding: General Funds

Responsible Parties: Planning and Community Development Department

Objectives: In order to mitigate the loss of affordable housing units, require new housing developments to replace all affordable housing units lost due to new development.

Timeframes: The replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed, and local policy shall be adopted by <DATE>. End of Sample Program

NEXT STEP:

- Move to Part E: Determination of Adequate Sites

PART E: DETERMINATION OF ADEQUATE SITES

The last step in this process is a determination of whether the housing element demonstrates sufficient land suitable and available for residential development to meet the locality's housing need for each designated income level or if further program actions are required to accommodate a shortfall.

Step 1: Consider any alternative means of meeting the RHNA
Government Code section 65583.1

The housing element may satisfy its RHNA requirement though a variety of methods other than identifying sites. The following is a description of those alternative methods.

- Units permitted, built, entitled or pending: (See Part A, Step 1)
- Potential for accessory dwelling units (ADU) or junior accessory dwelling units (JADU): The jurisdiction can count the potential for the development of ADUs within the planning period. The analysis is based on the following factors:
  - the number of ADUs or JADUs developed in the prior planning period
  - community need and demand for these types of housing units
  - the resources and/or incentives available that will encourage the development of ADUs
  - the availability of ADUs and JADUs for occupancy, rather than used as offices or guest houses
  - the unit must meet the Census definition of a housing unit, which can be found on the U.S. Census Bureau website, and be reported to the Department of Finance as part of the annual City and County Housing Unit Change Survey
  - the anticipated affordability of these units. The purpose of this analysis is to determine the appropriate RHNA income category to be accommodated through ADU and JADU development.

    Affordability can be determined in a number of ways. As an example, a community could survey existing ADUs and JADUs for their current market rents and consider other factors such as square footage, number of bedrooms, amenities, age of the structure and general location, including proximity to public transportation. Another method could examine current market rents for reasonably comparable rental properties to determine an average price per square foot in the community. This price can be applied to anticipated sizes of these units to estimate the anticipated affordability of ADUs and JADUs. Available regional studies and methodology on ADU affordability can also be a resource to determine the likely affordability mix for ADUs and JADUs.

  - other relevant factors as determined by HCD.

  In addition, the housing element must describe and analyze any currently adopted ordinance and other factors that could affect ADU and JADU development within the planning period. At a minimum, the housing element should analyze whether the ordinance conforms with state ADU and JADU requirements and any additional development standards (i.e., setbacks, maximum unit sizes, lot coverage, etc.) adopted by the local government, zones allowing ADUs, fees and exactions, and any other potential constraints impacting the development of ADUs and JADUs.

Impact of New Accessory Dwelling Unit Laws

Since 2017, the Legislature has passed a series of new laws that significantly increase the potential for development of new ADUs and JADUs by removing development barriers, allowing ADUs through ministerial permits, and requiring jurisdictions to include programs in their housing element that incentivize their development. As a result, using trend analysis when estimating the potential for development may not accurately reflect the increased potential for these units. To account for this increased potential, HCD recommends the following options when performing this analysis:

- Use the trends in ADU construction since January 2018 to estimate new production. This is a conservative option to only account for the effect of the new laws without local promotional efforts or incentives (safe harbor option).
- Where no other data is available, assume an average increase of five times the previous planning period construction trends prior to 2018. This option is a conservative estimate based upon statewide data on ADU development since the implementation of the new laws (safe harbor option).
- Use trends from regional production of ADUs.
- Include programs that aggressively promote and incentivize ADU and JADU construction.
- Other analysis (reviewed on a case-by-case basis).

Potential affordability of these units must still be calculated per the analysis outlined on the previous page. In addition to the above options, the element should also include a monitoring program that a) tracks ADU and JADU creation and affordability levels, and b) commits to a review at the planning cycle mid-point to evaluate if production estimates are being achieved. Depending on the finding of that review, amendments to the housing element may be necessary, including rezoning pursuant to Government Code 65583.2 (h)and (i).

- Alternative Adequate sites: Under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units that will be:
  - substantially rehabilitated
  - in a multifamily rental or ownership housing complex of three or more units that are converted from non affordable to affordable rental
  - preserved at levels affordable to low- or very low-income households, where the local government has provided those units with committed assistance

  For more information on this option, please refer to HCD's Building Blocks Webpage

- Manufactured housing, manufactured housing park hook-ups, floating homes/live aboard berths: In certain circumstances a jurisdiction can utilize the potential for new manufactured housing either in a manufactured housing park or on large properties in rural areas, or new floating home/liveaboard berths with sewer and water hook ups. In cases of a manufactured home park or in floating home/liveaboard berth marinas, the jurisdiction may count new spaces with infrastructure hook-ups intended for permanent residential occupancy and reported to the Department of Finance. Potential for manufactured homes in rural areas should be analyzed using the same factors as those

Site Inventory Guidebook Page 31 May 2020

for potential ADUs, including establishing the market rate affordability of the units and crediting them to the appropriate RHNA category. In addition, the analysis should indicate if appropriate water and sewer infrastructure is available to support the development.

- Former military housing: Sites that contain permanent housing units located on a military base undergoing closure or conversion as a result of action pursuant to the Defense Authorization Amendments and Base Closure and Realignment Act (Public Law 100-526), the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), or any subsequent act requiring the closure or conversion of a military base may be identified as an adequate site if the housing element demonstrates that the housing units will be available for occupancy by households within the planning period of the housing element. No sites containing housing units scheduled or planned for demolition or conversion to nonresidential uses shall qualify as an adequate site.
- In consultation with HCD, other alternatives may be considered, such as motel conversions, adaptive reuse of existing buildings, or legalization of units not previously reported to the Department of Finance.

Step 2: Determine whether there is sufficient capacity to accommodate the RHNA for the jurisdiction by income.
Government Code Section 65583(a)(3)

The following table is an example of that calculation:

Adjustment Factor	Very Low	Low	Moderate	Above Moderate
RHNA	**300**	**200**	**165**	**465**
Entitled, Permitted, or Constructed Project Projects	50	50	0	200
Accessory Dwelling Unit Potential	10	15	15	10
Adequate Sites Alternative Preservation	20	16		
Multifamily Residential R-3 (Vacant)	75	50		
Mixed Use MU (Nonvacant)	75	50	50	
Multifamily Residential (Vacant) R-2			75	
Single-Family (Vacant) R-1				200
Spring Valley Specific Plan			150	250
Total	**230**	**181**	**290**	**660**
Shortfall/Surplus	**-70**	**-19**	**+125**	**+195**

While the jurisdiction has sufficient sites to accommodate its RHNA for moderate- and above moderate-income units, it has a shortfall of 89 units to accommodate its lower income need. The jurisdiction would be required to include a program in the housing element to accommodate that shortfall.

If Yes: Congratulations, the site inventory analysis is complete

If No: Move to Step 3

Step 3: Adequate Sites Program
Government Code section 65583(f) and Government Code section 65583.2(h)

Where the inventory of sites does not identify adequate sites to accommodate the RHNA for lower income households, a program must be included to identify sites that can be developed for housing within the planning period. The housing element should include an inventory of potential sites for rezoning. Those sites must meet the adequate sites requirements in terms of the suitability and availability outlined above.

General Program Requirements
A jurisdiction's adequate sites program must accommodate 100 percent of the shortfall of sites necessary to accommodate the remaining housing need for housing for very low- and low-income households during the planning period and include the following components:

- Permit owner-occupied and rental multifamily uses by right for developments in which 20 percent or more of the units are affordable to lower income households. By right means local government review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval.
- Permit the development of at least 16 units per site.
- Ensure sites within suburban and metropolitan jurisdictions — as defined by Government Code Section 65583.2(c)(3)(B)(iii) and (iv) — permit a minimum of 16 dwelling units per acre for incorporated cities within nonmetropolitan/rural counties and nonmetropolitan counties with micropolitan areas or 20 dwelling units per acre for suburban and metropolitan jurisdictions.
- Ensure a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses, or b) if accommodating more than 50 percent of the low- and very low-income regional housing need on sites designated for mixed-uses, all sites designated for mixed-uses must allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.

Timing
Rezones due to a shortfall from the current planning period:

A locality's ability to accommodate needed housing during the planning period requires designating appropriate zoning as early as possible. Generally, however, a rezoning should occur no later than three years and 120 days from the beginning of the planning period. A one-year extension to the deadline to complete required rezoning may be allowed if a local government has completed rezoning at sufficient densities to accommodate at least 75 percent of the units for very-low and low-income households. Also, the jurisdiction must determine after a public meeting that substantial evidence supports findings and adoption of a resolution that the rezone deadline was not met due to one of the following reasons:

- Action or inaction beyond the control of the local government of any other state, federal, or local agency.
- Infrastructure deficiencies due to fiscal or regulatory constraints.

- The local government must undertake a major revision to its general plan in order to accommodate the housing-related policies of a sustainable communities strategy or an alternative planning strategy adopted pursuant to Section 65080.

The jurisdiction must provide HCD a copy of the resolution and findings along with: - a detailed budget and schedule for preparation and adoption of required rezoning within one year of the adoption of the resolution, - plans for citizen participation, and - expected interim actions to complete the rezoning, and any revisions to the general plan (Government Code section 65583(f).

Consequences for Failing to Complete Rezoning Deadline:
If a local government fails to complete all rezoning's by the prescribed deadline, a local government may not disapprove a housing development project[7], nor require a conditional use permit, planned unit development permit, or other locally imposed discretionary permit, or impose a condition that would render the project infeasible, if the housing development project:

- Is proposed to be located on a site included in a housing element program to be rezoned.
- Complies with applicable objective general plan and zoning standards and criteria, including design review standards, described in the rezone program action.

However, any subdivision of the site is subject to the Subdivision Map Act.

A jurisdiction may disapprove a housing development or approve it upon the condition that the project be developed at a lower density only if it makes written findings supported by substantial evidence on the record that both of the following conditions exist:

- The housing development project would have a specific, adverse impact upon the public health or safety[8].
- There is no feasible method to satisfactorily mitigate or avoid the adverse impact.

The local government may also be subject to enforcement actions by HCD, including a determination that the housing element no longer complies with the requirements of state law and referral to the Attorney General pursuant to Government Code section 65585(i) and (j).

[7] "Housing development project" is defined a project to construct residential units for which the project developer provides sufficient legal commitments to the appropriate legal agency to ensure the continued availability and use of at least 49 percent of the housing units for very-low, low-, and moderate-income households with an affordable housing cost or affordable rent.

[8] "Specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.



Housing Accountability Act and the Housing Element

The Housing Accountability Act (Government Code section 65589.5) establishes state overarching policy that a local government not deny, reduce the density of, or make infeasible housing development projects, emergency shelters, or farmworker housing that are consistent with objective local development standards and contribute to meeting housing need. Jurisdictions without a housing element in compliance with State Housing Element Law or without a complete site inventory are further limited in the ability to deny a housing development application.

Among other requirements (including those related to housing development regardless of affordability levels), the Housing Accountability Act states that a local agency shall not disapprove or condition approval in a manner that renders the housing development project infeasible, including through the use of design review standards, for development of an emergency shelter or a housing development project for very low, low-, or moderate-income households unless it makes written findings, based upon a preponderance of the evidence in the record, as to one of the following:

- The jurisdiction has adopted a housing element in substantial compliance with Housing Element Law and the jurisdiction has met or exceeded its share of the RHNA for the planning period for the income category proposed for the housing development project.
- The project would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to low- and moderate-income households or rendering the development of the emergency shelter financially infeasible.
- The denial of the project or imposition of conditions is required in order to comply with specific state or federal law, and there is no feasible method to comply without rendering the development unaffordable or rendering the development of the emergency shelter financially infeasible.
- The project is proposed on land zoned for agriculture or resource preservation, or which does not have adequate water or wastewater facilities to serve the project.
- The project is inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation, unless the housing development project is proposed on a site that is identified as suitable or available for very low, low-, or moderate-income households in the jurisdiction's housing element, or if the local agency has failed to identify in the inventory of land in its housing element sites that can be developed for housing within the planning period and are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels pursuant to Section 65584.

"Housing for very low, low-, or moderate-income households" means where at least 20 percent of the total units are or will be sold or rented to lower income households or 100 percent of the units will be sold or rented to persons and families of moderate income, or persons and families of middle income.

Site Inventory Guidebook Page 35 May 2020

Rezoned due to an unaccommodated need from previous planning period[9]:
Pursuant to Government Code section 65584.09, if the jurisdiction failed to make adequate sites available to accommodate the regional housing need in the prior planning period, the jurisdiction must zone or rezone sites to accommodate any unaccommodated need within the first year of the planning period. If more than one year has lapsed since the beginning of the planning period, the housing element cannot be found in compliance with Housing Element Law until the required zoning or rezoning is complete and the housing element is amended to reflect the necessary rezoning.

Annexation

If the jurisdiction must rely on annexation to accommodate its RHNA, the housing element must include a program committing to completing the annexation within three years of the planning period. In addition, the housing element must also include an evaluation of the suitability of the annexed sites, including the following information:

- Consistency with Local Agency Formation Commission (LAFCO) policies
- Actions to pre-zone prior to annexation
- Descriptions of the zone, density, development standards and design requirements
- The anticipated housing capacity allowed by each site
- Timeline to complete annexation which is early enough in the planning period to facilitate development of annexed sites (e.g., within the first three years of the planning period)
- Analysis of the suitability and availability of sites, including identification of any sites currently under Williamson Act contracts
- Demonstrated compliance with the requirements of the adequate sites program requirements of Government Code section 65583.2, subdivisions (h) and (i)

Please note, if the potential for annexation was not included in the RHNA allocation methodology, a portion of the county's allocation may be transferred to the city pursuant to Government Code section 65584.07(d). This transfer of RHNA would require an amendment to the housing element to ensure that any additional RHNA can be accommodated on sites within the inventory.

[9] Sometimes called the AB 1233 consequence.

Sample Rezone Program:

To accommodate the remaining lower-income RHNA of 89 units, the City of X will identify and rezone a minimum of 4.5 acres of vacant land to the R3 zoning district, allowing exclusively residential uses and a minimum of 20 units per acre to a maximum of 30 units per acre by June 30, 2024. Rezoned sites will permit owner-occupied and rental multifamily uses by right pursuant to Government Code section 65583.2(i) for developments in which 20 percent or more of the units are affordable to lower income households and will be selected from sites 20 through 30 in the parcel listing (Appendix A). As reflected in Appendix A, each site has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.

Objective: Create opportunity for at least 89 units of multifamily housing for lower income households

Responsible Agency: Community Development Department

Timeline: Sites rezoned by June 30, 2024

Funding Source(s): General fund

Other program ideas for increasing capacity or facilitating development on identified sites:

- Up-zone existing neighborhoods in areas of opportunity or in high quality neighborhood transit areas at appropriate densities to facilitate development of housing.
- Increase maximum allowable residential densities in existing residential, commercial, and mixed-use zones and modify development standards, such as height limitations to ensure maximum density can be achieved.
- Establish minimum densities — Designate minimum densities of development to ensure that existing available land is not underutilized.
- Allow and encourage mixed-use zoning — Permit housing in certain nonresidential zones either as part of a mixed-use project or as a standalone residential use.
- Rezone underutilized land from nonresidential to residential to expand the supply of available residential land.
- Institute flexible zoning — Allow various residential uses within existing nonresidential zones without requiring rezoning or conditional approvals.
- Redevelop and/or recycle underutilized existing land to more intensive uses.
- Convert obsolete, older public/institutional/commercial/industrial buildings to residential use through adaptive reuse and/or historic preservation.
- Over-zone — Create a surplus of land for residential development during the current planning period of at least 20 percent more than the locality's share of the regional housing need. Over-zoning compensates for urban land left vacant due to ownership and development constraints and creates a real surplus. A sufficient supply of land beyond the time frame of the housing element helps prevent land shortages from bidding up land costs.
- Allow and promote small and irregular-size lot development.



- Consolidate lots — Facilitate combining small residential lots into larger lots to accommodate higher-density development.
- Increase height limitations — At a minimum, allow three stories in multifamily zones.
- Increase Floor Area Ratios — Allow for larger buildings on smaller lots and/or more units per lot by reducing the floor area ratio (total lot area divided by the total building area).
- Identify publicly owned land suitable for affordable housing development and sell parcels for $1 (with consideration of the Surplus Land Act as amended by AB 1486, Statutes of 2019).
- Facilitate development by encouraging staff outreach to owners of potential sites and affordable housing developers to discuss needs and constraints in the jurisdiction.
- Adopt incentives such as a super density bonus or by right approval for housing that meets community objectives, such as housing near transit, affordability, housing that meets the needs of special populations, etc.
- Adopt a specific plan that streamlines CEQA compliance.

Common Program Questions and Answers for Shortfall Zoning:

Q: How do I establish the density range for a rezone site?
A: The density range is set at the minimum density (either 16 or 20 dwelling units per acre, depending on the jurisdiction). While there is no specific maximum density requirement, the range must include the density that was identified as appropriate to accommodate housing affordable to lower-income households (Part B, Step 2).

However, jurisdictions should not set the minimum and maximum density range at the same density (e.g., 20 units per acre minimum as both a minimum and maximum density). If identifying a narrow density range, the housing element must analyze the range as a potential governmental constraint on housing development, including potential impacts resulting from site constraints, financial considerations, and other development factors.

Q: If a development is proposed with less than 20 percent affordability to lower income, can the jurisdiction approve it?
A: Yes, however, the project would not qualify for the by right provisions of this law unless the underlining zone already permitted housing by right. This, and all housing development projects, is subject to the Housing Accountability Act. In addition, the jurisdiction may be subject to No Net Loss Law provisions.

Q: How is the 20 percent calculated when State Density Bonus Law is added?
A: This 20 percent calculation is based upon the total number of units in the development including additional units provided by a density bonus. This calculation methodology is consistent with several other pieces of housing laws, including the Streamlined Ministerial Approval Process (Government Code section 65913.4) and the Housing Accountability Act.

ATTACHMENT 1: SUMMARY OF NEW LAWS REFERENCED IN THE GUIDEBOOK

AB 1397, Low (Chapter 375, Statutes of 2017): The law made a number of revisions to the site inventory analysis requirements of Housing Element Law. In particular, it requires stronger justification when nonvacant sites are used to meet housing needs, particularly for lower income housing, requires by right housing when sites are included in more than one housing element, and adds conditions around size of sites, among others.

AB 686, Santiago (Chapter 958, Statutes of 2018): The law ensures that public entities, including local governments, administer their programs relating to housing and urban development in a manner affirmatively to further the purposes of the federal Fair Housing Act and do not take any action that is materially inconsistent with its obligation to affirmatively further fair housing. It also requires that housing elements of each city and county promote and affirmatively further fair housing opportunities throughout the community for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act, Government Code Section 65008, and any other state and federal fair housing and planning law. AB 686 requires jurisdictions to conduct an assessment of fair housing in the housing element, prepare the housing element site inventory through the lens of affirmatively furthering fair housing, and include program(s) to affirmatively further fair housing.

SB 6, Beall (Chapter 667, Statutes of 2019): Jurisdictions are required to prepare the site inventory on forms developed by HCD and send an electronic version with their adopted housing element to HCD. HCD will then send those inventories to the Department of General Services by December 31 each year. The law (?) authorizes HCD to review, adopt, amend, and repeal the standards, forms, or definitions to implement this subdivision and subdivision (a) of Section 65583.

AB 1486, Ting (Chapter 644, Statutes of 2019): The law expanded the definition of surplus land and added additional requirements on the disposal of surplus land. In addition, local agencies must send notices of availability to interested entities on a list maintained by HCD. This list and notices of availability are maintained on HCD's website. Local agencies must also send a description of the notice and subsequent negotiations for the sale of the land, which HCD must review, and within 30 days submit written finding of violations of law. Violations of the Surplus Land Act can be referred to the Attorney General. Finally, it adds a requirement in Housing Element Law for the jurisdiction to identify which of the sites included in the inventory are surplus property.



ATTACHMENT 2: GOVERNMENT CODE SECTION 65583.2

As of January 1, 2020

(a) A city's or county's inventory of land suitable for residential development pursuant to paragraph (3) of subdivision (a) of Section 65583 shall be used to identify sites throughout the community, consistent with paragraph (9) of subdivision (c) of Section 65583, that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels pursuant to Section 65584. As used in this section, "land suitable for residential development" includes all of the sites that meet the following standards set forth in subdivisions (c) and (g):

(1) Vacant sites zoned for residential use.

(2) Vacant sites zoned for nonresidential use that allows residential development.

(3) Residentially zoned sites that are capable of being developed at a higher density, including sites owned or leased by a city, county, or city and county.

(4) Sites zoned for nonresidential use that can be redeveloped for residential use, and for which the housing element includes a program to rezone the site, as necessary, rezoned for, to permit residential use, including sites owned or leased by a city, county, or city and county.

(b) The inventory of land shall include all of the following:

(1) A listing of properties by assessor parcel number.

(2) The size of each property listed pursuant to paragraph (1), and the general plan designation and zoning of each property.

(3) For nonvacant sites, a description of the existing use of each property. If a site subject to this paragraph is owned by the city or county, the description shall also include whether there are any plans to dispose of the property during the planning period and how the city or county will comply with Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.

(4) A general description of any environmental constraints to the development of housing within the jurisdiction, the documentation for which has been made available to the jurisdiction. This information need not be identified on a site-specific basis.

(5) (A) A description of existing or planned water, sewer, and other dry utilities supply, including the availability and access to distribution facilities.

(B) Parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan, including a program or plan of a public or private entity providing water or sewer service, to secure sufficient water, sewer, and dry utilities supply to support housing development. This paragraph does not impose any additional duty on the city or county to construct, finance, or otherwise provide water, sewer, or dry utilities to parcels included in the inventory.

(6) Sites identified as available for housing for above moderate-income households in areas not served by public sewer systems. This information need not be identified on a site-specific basis.

(7) A map that shows the location of the sites included in the inventory, such as the land use map from the jurisdiction's general plan, for reference purposes only.

Site Inventory Guidebook Page 40 May 2020

(c) Based on the information provided in subdivision (b), a city or county shall determine whether each site in the inventory can accommodate the development of some portion of its share of the regional housing need by income level during the planning period, as determined pursuant to Section 65584. The inventory shall specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing. A nonvacant site identified pursuant to paragraph (3) or (4) of subdivision (a) in a prior housing element and a vacant site that has been included in two or more consecutive planning periods that was not approved to develop a portion of the locality's housing need shall not be deemed adequate to accommodate a portion of the housing need for lower income households that must be accommodated in the current housing element planning period unless the site is zoned at residential densities consistent with paragraph (3) of this subdivision and the site is subject to a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households. An unincorporated area in a nonmetropolitan county pursuant to clause (ii) of subparagraph (B) of paragraph (3) shall not be subject to the requirements of this subdivision to allow residential use by right. The analysis shall determine whether the inventory can provide for a variety of types of housing, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. The city or county shall determine the number of housing units that can be accommodated on each site as follows:

(1) If local law or regulations require the development of a site at a minimum density, the department shall accept the planning agency's calculation of the total housing unit capacity on that site based on the established minimum density. If the city or county does not adopt a law or regulation requiring the development of a site at a minimum density, then it shall demonstrate how the number of units determined for that site pursuant to this subdivision will be accommodated.

(2) The number of units calculated pursuant to paragraph (1) shall be adjusted as necessary, based on the land use controls and site improvements requirement identified in paragraph (5) of subdivision (a) of Section 65583, the realistic development capacity for the site, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.

(A) A site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site is adequate to accommodate lower income housing.

(B) A site larger than 10 acres shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site can be developed as lower income housing. For purposes of this subparagraph, "site" means that portion of a parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision.



(C) A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.

(3) For the number of units calculated to accommodate its share of the regional housing need for lower income households pursuant to paragraph (2), a city or county shall do either of the following:

(A) Provide an analysis demonstrating how the adopted densities accommodate this need. The analysis shall include, but is not limited to, factors such as market demand, financial feasibility, or information based on development project experience within a zone or zones that provide housing for lower income households.

(B) The following densities shall be deemed appropriate to accommodate housing for lower income households:

(i) For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre.

(ii) For an unincorporated area in a nonmetropolitan county not included in clause (i): sites allowing at least 10 units per acre.

(iii) For a suburban jurisdiction: sites allowing at least 20 units per acre.

(iv) For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.

(d) For purposes of this section, a metropolitan county, nonmetropolitan county, and nonmetropolitan county with a micropolitan area shall be as determined by the United States Census Bureau. A nonmetropolitan county with a micropolitan area includes the following counties: Del Norte, Humboldt, Lake, Mendocino, Nevada, Tehama, and Tuolumne and other counties as may be determined by the United States Census Bureau to be nonmetropolitan counties with micropolitan areas in the future.

(e) (1) Except as provided in paragraph (2), a jurisdiction shall be considered suburban if the jurisdiction does not meet the requirements of clauses (i) and (ii) of subparagraph (B) of paragraph (3) of subdivision (c) and is located in a Metropolitan Statistical Area (MSA) of less than 2,000,000 in population, unless that jurisdiction's population is greater than 100,000, in which case it shall be considered metropolitan. A county, not including the City and County of San Francisco, shall be considered suburban unless the county is in an MSA of 2,000,000 or greater in population in which case the county shall be considered metropolitan.

(2) (A) (i) Notwithstanding paragraph (1), if a county that is in the San Francisco-Oakland-Fremont California MSA has a population of less than 400,000, that county shall be considered suburban. If this county includes an incorporated city that has a population of less than 100,000, this city shall also be considered suburban. This paragraph shall apply to a housing element revision cycle, as described in subparagraph (A) of paragraph (3) of subdivision (e) of Section 65588, that is in effect from July 1, 2014, to December 31, 2028, inclusive.

(ii) A county subject to this subparagraph shall utilize the sum existing in the county's housing trust fund as of June 30, 2013, for the development and preservation of housing affordable to low- and very low-income households.

(B) A jurisdiction that is classified as suburban pursuant to this paragraph shall report to the Assembly Committee on Housing and Community Development, the Senate Committee on

Housing, and the Department of Housing and Community Development regarding its progress in developing low- and very low income housing consistent with the requirements of Section 65400. The report shall be provided three times: once, on or before December 31, 2019, which report shall address the initial four years of the housing element cycle, a second time, on or before December 31, 2023, which report shall address the subsequent four years of the housing element cycle, and a third time, on or before December 31, 2027, which report shall address the subsequent four years of the housing element cycle and the cycle as a whole. The reports shall be provided consistent with the requirements of Section 9795.

(f) A jurisdiction shall be considered metropolitan if the jurisdiction does not meet the requirements for "suburban area" above and is located in an MSA of 2,000,000 or greater in population, unless that jurisdiction's population is less than 25,000 in which case it shall be considered suburban.

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

(2) In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.

(3) Notwithstanding any other law, and in addition to the requirements in paragraphs (1) and (2), sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control through a public entity's valid exercise of its police power, or occupied by low or very low income households, shall be subject to a policy requiring the replacement of all those units affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall be consistent with those set forth in paragraph (3) of subdivision (c) of Section 65915.

(h) The program required by subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583 shall accommodate 100 percent of the need for housing for very low and low-income households allocated pursuant to Section 65584 for which site capacity has not been identified in the inventory of sites pursuant to paragraph (3) of subdivision (a) on sites that shall be zoned to permit owner-occupied and rental multifamily residential use by right



for developments in which at least 20 percent of the units are affordable to lower income households during the planning period. These sites shall be zoned with minimum density and development standards that permit at least 16 units per site at a density of at least 16 units per acre in jurisdictions described in clause (i) of subparagraph (B) of paragraph (3) of subdivision (c), shall be at least 20 units per acre in jurisdictions described in clauses (iii) and (iv) of subparagraph (B) of paragraph (3) of subdivision (c) and shall meet the standards set forth in subparagraph (B) of paragraph (5) of subdivision (b). At least 50 percent of the very low and low-income housing need shall be accommodated on sites designated for residential use and for which nonresidential uses or mixed uses are not permitted, except that a city or county may accommodate all of the very low and low-income housing need on sites designated for mixed uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

(i) For purposes of this section and Section 65583, the phrase "use by right" shall mean that the local government's review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Any subdivision of the sites shall be subject to all laws, including, but not limited to, the local government ordinance implementing the Subdivision Map Act. A local ordinance may provide that "use by right" does not exempt the use from design review. However, that design review shall not constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Use by right for all rental multifamily residential housing shall be provided in accordance with subdivision (f) of Section 65589.5.

(j) Notwithstanding any other provision of this section, within one-half mile of a Sonoma-Marin Area Rail Transit station, housing density requirements in place on June 30, 2014, shall apply.

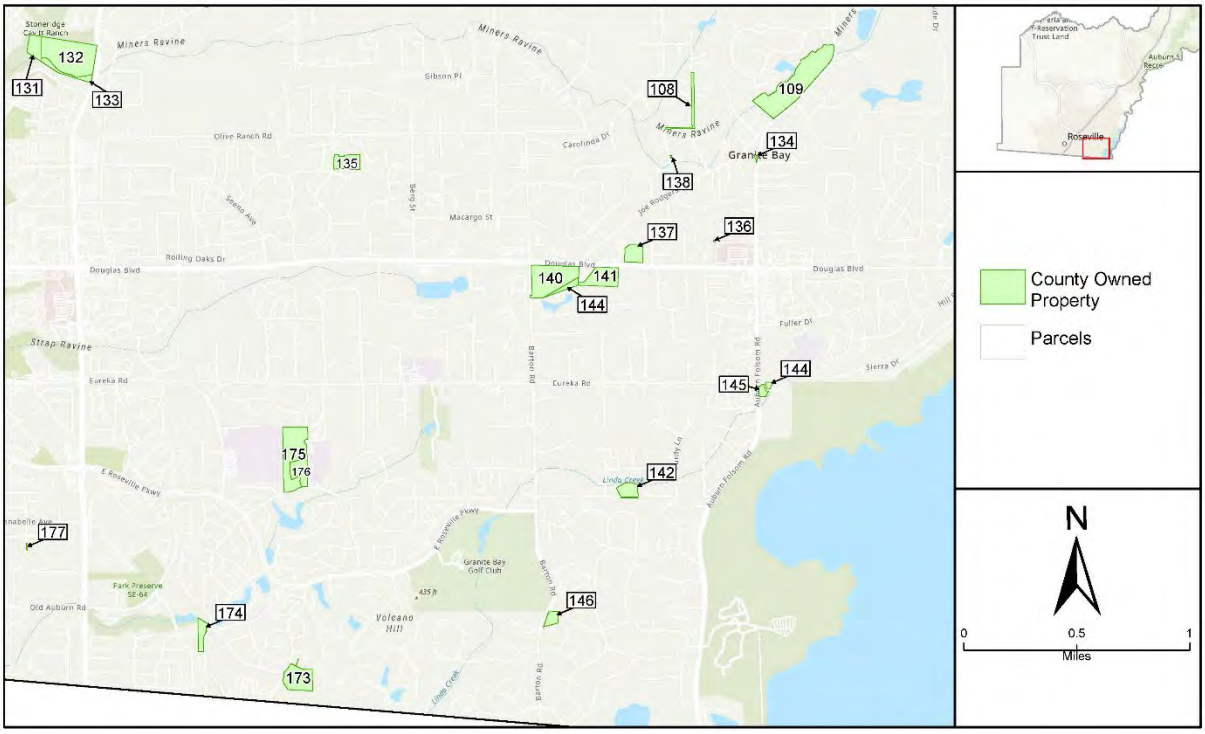
(k) For purposes of subdivisions (a) and (b), the department shall provide guidance to local governments to properly survey, detail, and account for sites listed pursuant to Section 65585.

(l) This section shall remain in effect only until December 31, 2028, and as of that date is repealed.

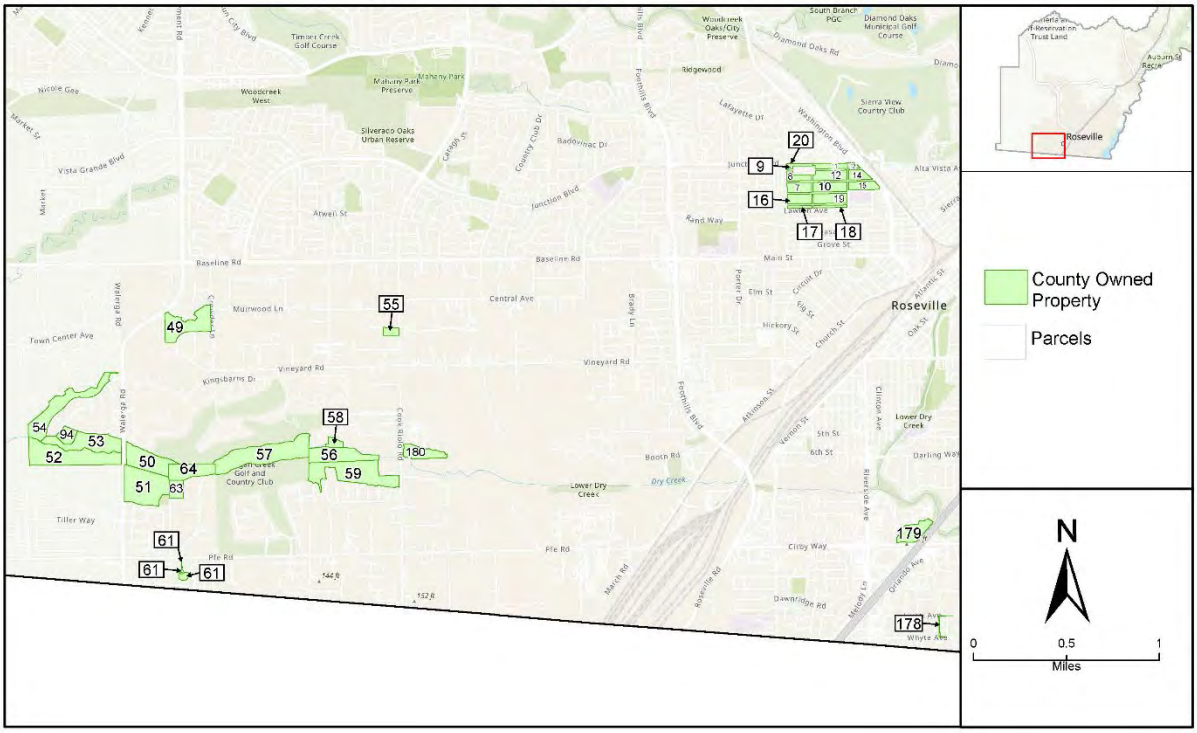
(Amended (as amended by Stats. 2018, Ch. 958, Sec. 3) by Stats. 2019, Ch. 664, Sec. 15.5. (AB 1486) Effective January 1, 2020. Repealed as of December 31, 2028, by its own provisions. See later operative version amended by Sec. 16.5 of Stats. 2019, Ch. 664.)



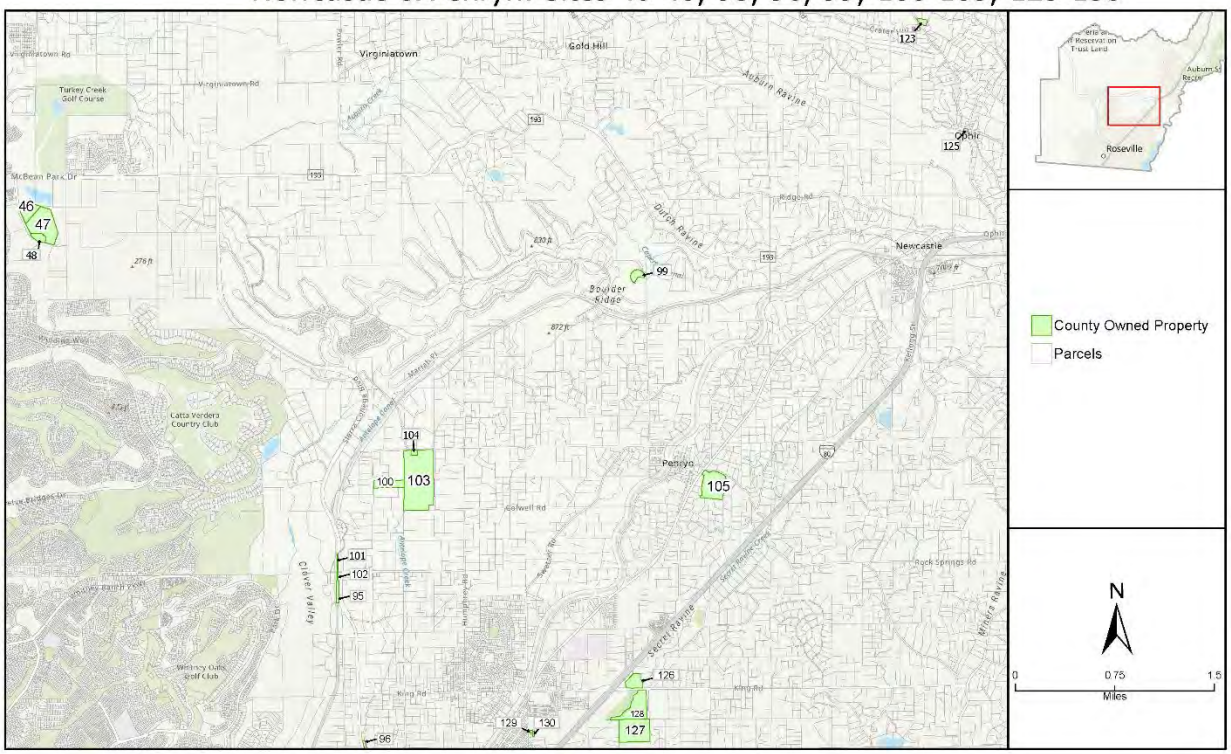
Granite Bay: 108 & 109; 131-146; 173-176



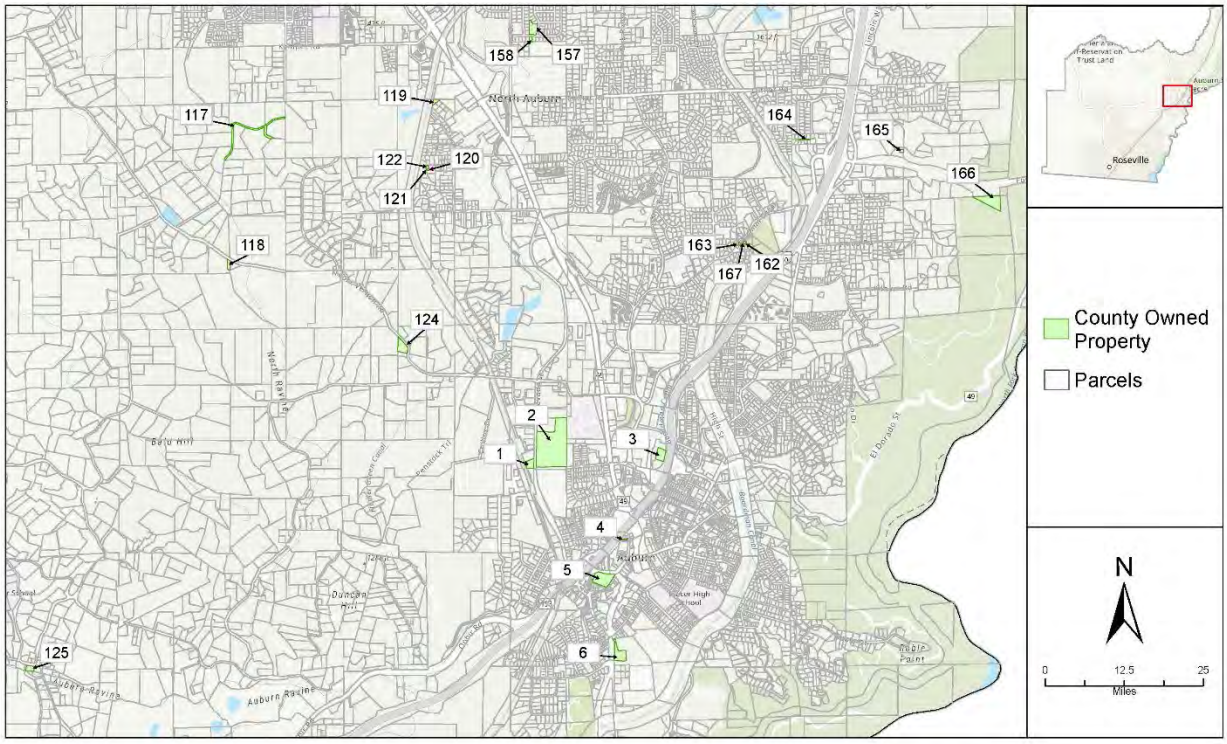
West Roseville: Sites 7-20; 49-61; 94; 179-190



Newcastle & Penryn: Sites 46-48; 95, 96, 99; 100-105; 123-130



Auburn: Sites 1-6; 117-125; 157-158; 162-167



LETTER 11: DEFEND GRANITE BAY

Response to Comment 11-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 11-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 11-3
Please see Master Response 1 – Non-EIR/Administrative Issues. The Draft EIR meets CEQA's alternatives requirement by evaluating a reasonable range of alternatives (15126.6[f]). According to 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The alternatives evaluated in the Draft EIR present a range of alternatives that meet most of the basic objectives of the proposed projects and avoid one or more significant effects of the proposed project (15126.6[c]). In doing so, they meet CEQA requirements for an alternatives analysis and foster informed decision making.

Response to Comment 11-4
Access to services and resources was one of the criteria that was used in the selection of the sites. However, it was just one factor that was considered and weighed in the evaluation process. Given the rural nature of unincorporated area of Placer County as a whole, the number of locations where community services, infrastructure, and employment opportunities all exist around one site are limited. The rezone sites were identified based on the relative lack of constraints, the ability of the sites to provide adequate infrastructure to support high density residential development, and proximity to local services.

Response to Comment 11-5
Please see Response to Comment 11-2 and Response to Comment 11-4.

Response to Comment 11-6
Pursuant to General Plan Policy 4.D.3, the project applicant of each future residential development project on the rezone sites would be required to provide written certification from the service provider that either existing services are available or needed improvements would be made prior to occupancy of the development. Compliance with General Plan Policy 4.D.3 would ensure that adequate capacity would be available to serve the projected demand generated by the future residential development of each rezone site, in addition to the County's existing commitments. The County also requires a connection fee and payment of development mitigation fees each time a building permit is issued which funds sewer system infrastructure and capacity improvements.

Response to Comment 11-7
Appendix C, Site Inventory Forms, of the Draft EIR, correctly lists the zoning of Rezone Site #26 as Commercial Planned Development, combining Design Scenic Corridor (CPD-Dc). The –Dc combining district provides special regulations to protect and enhance the aesthetic character of lands and buildings within public view. Development of the site would be subject to review and approval by Placer County. Such an assessment would be conducted during the review of the Improvement Plans and all building permits for a proposed project and include, but is not limited

to, architectural colors, materials, and textures of all structures; landscaping; irrigation; exterior lighting; fences and walls; site amenities, and signs and entry features.

Response to Comment 11-8

Financial feasibility is beyond the scope of a CEQA analysis. Please see Master Response 1 – Non-EIR/Administrative Issues. For information purposes, the Housing Element includes an analysis that demonstrates the zoning and densities that encourage and facilitate the development of housing for lower-income households. Information gathered from local developers and examples of recent residential projects that provide housing for lower-income households has informed the proposed Rezone Program that has established a minimum residential density of 20 units per acre. It is recognized that housing affordable to lower-income households requires significant subsidies and financial assistance.

The Housing Element includes a number of programs that are intended to work in concert to increase the amount of affordable housing in the County, including Program HE-15, through which the County will provide technical assistance in the development of affordable housing, facilitate plan development for affordable housing, and support the financing of affordable housing.

Response to Comment 11-9

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 12

February 27, 2024

To: Placer County
Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr., Ste 190
Auburn, CA 95603

From: Dry Creek Resident

Subject: Housing Needs Rezone Program

Placer County Planning Commission and Placer County Board of Supervisors:

12-1 The impact of this rezoning proposal to allow high density, low and very low income housing projects to be developed in Dry Creek would be a huge blow to our community's long established rural lifestyle. The County should have required the developers of projects in our area to include low income housing in their plans, but they didn't. Now they are asking us to pay the price for their mistake. The site off Cook-Riolo Rd (9-10) would cause damage to existing residents, strain resources, and increase traffic in our community. It should not be up to one homeowner to decide for the community if multifamily housing should be built in Dry Creek.

12-2 The Dry Creek/West Placer Community Plan was developed with the County, existing Dry Creek residents, and potential developers. Once adopted, it was expected that only compliant, *compatible* "rural infill" housing would be constructed that would not ruin the area's rural character, affect its riparian corridor, compromise the water quality and quantity of our wells, or disrupt drainage routes to filter rain runoff and allow groundwater to recharge. Based upon the Community Plan, Dry Creek residents have invested in improving the value of their homes, property and our rural community. They have made this their home because they welcome the escape from crowded urban living and they enjoy its rural ambience. High rise, multifamily housing would destroy this community and the security and sanctity of our rural lifestyle.

12-3 Obviously, a multi-unit apartment complex cannot magically be made inconspicuous or compatible with the existing rural homes and property, nor can it be seen as desired rural infill housing. The high density housing proposal for sites 9-10 in Dry Creek would add considerable and permanent noise and light pollution, as well as the construction noise that would adversely affect the quality of life and property values of residents who live directly adjacent to the project. Construction vehicle traffic and future residents would create a serious conflict with the existing traffic pattern and congestion already under strain from parents dropping off/picking up their children at the Creekview Ranch School which is located directly across the street from the proposed site.

12-4 The County says they need RM30, but in reality, the rezone does not require the sites to *actually* be built as low income, so this just seems like an excuse to push for more housing in Dry Creek without much oversight.

Typically, urban areas have high density housing and are more walkable with greater public transportation, while rural areas have low density housing. There are no buses, sidewalks or street lights in Dry Creek. This really is country living, so please don't destroy our lives just to meet a housing quota!

12-5 We respectfully request that the County select a different site where it will complement neighboring design goals and meet the needs of those future residents. We request Dry Creek be excluded and exempt from the rezoning program which would be extremely detrimental to this small country neighborhood.

Sincerely,

LETTER 12: DRY CREEK RESIDENTS

Response to Comment 12-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 12-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 12-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 12-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 12-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 13

Hello Fellow Dry Creek Residents,

Please support our rural community and help protect it by providing your valuable input to our Placer County officials as soon as possible. The County is planning to rezone areas in Dry Creek to allow high density multifamily housing, one of which they have designated across the street from the entrance to the Creekview Ranch School on Cook-Riolo. Traffic here is already an issue and adding a few hundred more cars to the mix would be a disaster. They have suggested 92 units, but according to the County, the new Residential Multifamily 30 (RM30) district will be a new zone with a *minimum* density of 20 dwelling units per acre and maximum density of 30 units per acre. Ultimately, the number of units in the complex could be much closer to 140.

13-1 Dry Creek is ill-equipped to absorb more urban housing, and most certainly can't accommodate the higher density housing and traffic a multifamily rezone project will incur at this location. There's already a large 500 home development going in on Vineyard between Cook-Riolo and Brady Ln. The County should have required developers of projects in our area to include low income housing in their plans, but they didn't. Now they are trying to find project sites in Dry Creek, even though apartments are not compatible with our rural community. The County has to *designate* sites for affordable housing, and once it's rezoned the property can only be used for high density type housing, which means high rise apartments. Dry Creek was originally supposed to be 2 acre, then 1 acre minimum housing but they keep whittling our community down with sprawling developments that have much smaller lots. High rise, multifamily housing would destroy this community and the security of our rural lifestyle. The County contacted the property owners of the rezone sites and requested their approval. It shouldn't be up to an individual homeowner to decide for the rest of us in the community if high density apartments should be built here.

Please ask the County to put more effort into selecting a more suitable site for the rezone project. Placer County is required to submit the projects identified in its Housing Element HE-1 to the State by May 15, 2024. Please express your concerns to the Board and our Rep. Bonnie Gore by mail, phone or email by March 18. https://www.placer.ca.gov/8794/Housing-needs-rezone-program

Watch the Board of Supervisors Feb 22, 2024 meeting on YouTube
https://www.youtube.com/watch?v=AYfnQCMev-Q&t=651s

You are welcome to use or edit the letter included here, or compose your own. Please mail to the address below as soon as possible to contest the rezoning project.

Shirlee Herrington
Environmental Coordination Services
3091 County Center Dr.
Auburn, CA 95603

Robyn Dahlgren, District 1 Planning Commission Representative
Placer County Planning Commission
3091 County Center Dr.
Auburn, CA 95603

Or via email or fax to: cdraecs@placer.ca.gov
Fax: (530) 745-3080

In addition, please voice your opinion with our District 1 Supervisor, Bonnie Gore.

Email her at: SupervisorGore@Placer.CA.Gov
Phone: 916-787-8950
Fax: 530-889-4009

Deadline to submit comments must be received by 5pm on March 18, 2024.

February 27, 2024

To: Placer County
Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr., Ste 190
Auburn, CA 95603

From: Dry Creek Resident

Subject: Housing Needs Rezone Program

Placer County Planning Commission and Placer County Board of Supervisors:

The impact of this rezoning proposal to allow high density, low and very low income housing projects to be developed in Dry Creek would be a huge blow to our community's long established rural lifestyle. The County should have required the developers of projects in our area to include low income housing in their plans, but they didn't. Now they are asking us to pay the price for their mistake. The site off Cook-Riolo Rd (9-10) would cause damage to existing residents, strain resources, and increase traffic in our community. It should not be up to one homeowner to decide for the community if multifamily housing should be built in Dry Creek.

The Dry Creek/West Placer Community Plan was developed with the County, existing Dry Creek residents, and potential developers. Once adopted, it was expected that only compliant, *compatible* "rural infill" housing would be constructed that would not ruin the area's rural character, affect its riparian corridor, compromise the water quality and quantity of our wells, or disrupt drainage routes to filter rain runoff and allow groundwater to recharge. Based upon the Community Plan, Dry Creek residents have invested in improving the value of their homes, property and our rural community. They have made this their home because they welcome the escape from crowded urban living and they enjoy its rural ambience. High rise, multifamily housing would destroy this community and the security and sanctity of our rural lifestyle.

13-2

Obviously, a multi-unit apartment complex cannot magically be made inconspicuous or compatible with the existing rural homes and property, nor can it be seen as desired rural infill housing. The high density housing proposal for sites 9-10 in Dry Creek would add considerable and permanent noise and light pollution, as well as the construction noise that would adversely affect the quality of life and property values of residents who live directly adjacent to the project. Construction vehicle traffic and future residents would create a serious conflict with the existing traffic pattern and congestion already under strain from parents dropping off/picking up their children at the Creekview Ranch School which is located directly across the street from the proposed site.

The County says they need RM30, but in reality, the rezone does not require the sites to *actually* be built as low income, so this just seems like an excuse to push for more housing in Dry Creek without much oversight.

Typically, urban areas have high density housing and are more walkable with greater public transportation, while rural areas have low density housing. There are no buses, sidewalks or street lights in Dry Creek. This really is country living, so please don't destroy our lives just to meet a housing quota!

We respectfully request that the County select a different site where it will complement neighboring design goals and meet the needs of those future residents. We request Dry Creek be excluded and exempt from the rezoning program which would be extremely detrimental to this small country neighborhood.

Sincerely,

LETTER 13: DRY CREEK RESIDENTS

Response to Comment 13-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 13-2

Please see Responses to Comment Letter 12.

Letter 14

mountain area preservation

March 7, 2024

Kally Kedinger-Cecil, Senior Planner
Placer County Community Development Resource Agency
Planning Services Division
3091 County Center Dr., Ste. 190
Auburn, CA 95603

Submitted via Email to kkedinge@placer.ca.gov

Re: Housing Element Amendment

Dear Ms. Kedinger-Cecil,

14-1 Thank you for the opportunity to comment on Placer County's Housing Element Amendment. Mountain Area Preservation (MAP) is a 36-year-old grassroots environmental non-profit dedicated to protecting open space, preserving mountain character, and advocating for smart growth in the Truckee Tahoe region. We are also committed to ensuring that environmental justice is woven into local planning processes and that new development supports low-income community members and the workforce. With those goals in mind, we submit the following comments for consideration.

Workforce and Affordable Housing

14-2 Truckee Tahoe is in an extreme affordable and workforce housing crisis, as is much of California. However, in our region, this is not due to a lack of housing stock but rather to a lack of housing availability, as somewhere between half to two-thirds of the housing in this region sits vacant most of the year, functioning as second homes or vacation rentals. Truckee Tahoe does not need more market-rate luxury condos for second homeowners. This area needs housing for

mountain area preservation

14-2 con't | the workers who power the community. Through project review, land use advocacy, and collaboration with local partners, MAP has helped to bring over 700 workforce housing units to the region, so we know how to get these projects built.

14-3 | We are concerned that the proposed housing rezones will encourage developers to build more market-rate units. Affordable by design does not work in Truckee Tahoe. The new zone district does not include a requirement to construct affordable housing beyond the requirements of County Code Article 15.64, Affordable Housing, but it should. If Placer County is going to provide more density and development potential, strategies must be considered to incentivize affordable and workforce housing. We understand that an increase in density would enable the construction of various housing types, but time and again, we have seen that developers will always choose to build the most lucrative housing product, which means more luxury condos. This should be factored into the Housing Rezone Program in order to develop a strategy that truly addresses the region's housing needs.

14-4 | That said, we understand the State's requirements and the Regional Housing Needs Allocation (RHNA) shortfall that Placer County is trying to address. Given the nature of our organization, MAP is specifically interested in potential upzones in the Truckee Tahoe region. Initially, several sites were included for consideration in Truckee Tahoe, but that list has since narrowed to one parcel (Site 45 at 235 Alpine Meadows Road, close to CA 89). We appreciate and support the removal of the other sites. Our comments today are focused on Site 45.

14-5 | This site already serves an important function as it's currently developed with workforce housing. It is also located in close proximity to a Very High Fire Hazard Severity Zone with only one route of ingress/egress. Upzoning the site to the

mountain area preservation

14-5 con't

RM30 zoning designation could result in the addition of 48 residential units. This site could be a good location for higher-density workforce housing to support nearby ski resorts, including Alpine Meadows and Palisades, but special considerations are warranted to ensure that existing residents are not displaced to accommodate the construction of new units.

14-6

This site would also require a comprehensive analysis of potential increases in vehicle miles traveled (VMT) through this heavily trafficked area and any associated impacts on wildfire evacuation risks or Lake Tahoe water quality related to sediment deposition. Due to its proximity to the ski resorts, redevelopment of this site could result in the construction of luxury condos and market-rate housing if restrictions are not put in place to ensure that the units are affordable for low-income families and workers. Please utilize this opportunity to create the housing our region so desperately needs, not more market-rate luxury condos. Thank you for considering these comments.

Sincerely,

Alexis Ollar, MAP Executive Director

Sophia Heidrich, MAP Advocacy Director

LETTER 14: ALEXIS OLLAR, MOUNTAIN AREA PRESERVATION

Response to Comment 14-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 14-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 14-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 14-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 14-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 14-6
Impacts related to VMT are discussed in Chapter 8, Transportation, of the Draft EIR. As discussed therein, future development of Rezone Site #45 would exceed the County's VMT threshold. Even with implementation of VMT reduction strategies as required in Mitigation Measure 8-5, the VMT impact of future development on Rezone Site #45 would remain significant and unavoidable.

Letter 15

mountain area preservation

March 18, 2024

Shirlee Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
Submitted via Email to cdraecs@placer.ca.gov

Re: Placer County Housing Rezone - Draft Environmental Impact Report

Dear Ms. Herrington,

15-1 Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for Placer County's proposed Housing Element Sites Rezone Project. Mountain Area Preservation (MAP) is a 36-year-old grassroots environmental non-profit dedicated to protecting open space, preserving mountain character, and advocating for smart growth in the Truckee Tahoe region. We are also committed to ensuring that environmental justice is woven into local planning processes and that new development supports low-income community members and the workforce. With those goals in mind, we submit the following comments for your consideration.

Workforce and Affordable Housing

15-2 Truckee Tahoe is in an extreme affordable and workforce housing crisis. This is not due to a lack of housing stock but rather to a lack of housing availability, as somewhere between half to two-thirds of the housing in this region sits vacant most of the year, functioning as second homes or vacation rentals. Truckee Tahoe does not need more market-rate luxury condos for second homeowners. This area needs housing for the workers who power the community. Through project review, land use advocacy, and collaboration with local partners, MAP

1

mountain area preservation

has helped to bring over 700 workforce housing units to the region, so we know how to get these projects built.

Our group has seen firsthand how projects that utilize density and height incentives still need tax credit funding to be affordable to the local workforce. When tax credits are utilized, there is no local control over how affordable housing serves community needs. Local market-rate rentals, often under the guise of achievable housing, have been built as modular development. These developments have both functioned and failed in Truckee. Unfortunately, modular development does not typically stand the test of time in our mountain elements. These projects have been afforded more density, height, and a streamlined process, but the local deed restriction enforcement has failed, with many of these units not going to the required recipients. Essentially, the result is more housing for those who can afford what the market can bear, which is not the Tahoe workforce. Severe deed-restriction enforcement provisions need to be outlined in development agreements to avoid these issues, improve public trust, and create better accountability so that the land use advantages are not exploited.

15-2 con't

We are concerned that the proposed housing rezones will encourage developers to build more market-rate units. The new zone district does not include a requirement to construct affordable housing beyond the requirements of County Code Article 15.64, Affordable Housing, *but it should*. We cannot stress this point enough. If Placer County is going to provide more density and development potential, strategies must be considered to incentivize affordable and workforce housing. We understand that an increase in density would enable the construction of various housing types, but time and again, we have seen that developers will most often choose to build the most lucrative housing product, which means more luxury condos. This should be factored into the

15-3

mountain area preservation

15-3 con't | Housing Rezone Program to develop a strategy that truly addresses the region's housing needs.

DEIR Alternatives

15-4 | At the Board of Supervisors hearing on February 13th, the Board directed staff to continue considering an amended site list. We understand that this is a rushed process due to State requirements and deadlines, but one of the alternatives considered in the DEIR should be the one the Board of Supervisors directed staff to pursue. The Board directed staff to move forward in consideration of rezoning 19 properties to address RHNA requirements. This would be an environmentally superior alternative that is likely to be adopted, yet it is not analyzed or included in the DEIR.

Comments on Specific Sites (Sites 44, 45, 68, and 69)

15-5 | Given the nature of our organization, MAP is specifically interested in the four parcels in the Truckee Tahoe region (Sites 44, 45, 68, and 69). The amended site list the Board of Supervisors directed staff to move forward with does not include Sites 44, 68, and 69. Site 44 was added late in this process, and staff noted at the February 13th hearing that the parcel was removed because the property owner wanted to refrain from participating in the rezone. Sites 68 and 69 were withdrawn from consideration because those property owners have yet to respond to staff inquiries about whether they would like to participate. Staff has noted that should the property owners respond to their inquiries and wish to be included in the rezone program, the Board could direct staff to resume consideration of these parcels. Since all four sites are being analyzed in the DEIR, we will continue to provide comments related to these four parcels.

15-6 | **Sites 44, 45, 68, and 69 (Aesthetic Resources Impacts):**
The DEIR fails to analyze potential impacts on aesthetic resources in the highly scenic Highway 89 and Highway 267 corridors. While the DEIR accurately notes

mountain area preservation

15-6 con't

that there are no federal, state, or county-designated scenic corridors in the planning area, it is impossible to deny the scenic qualities of these two areas. In fact, Visit Truckee Tahoe names these two corridors as top scenic drives near Truckee to capture fall colors, AllTrips calls Highway 89 a scenic drive not to miss, and the Town of Truckee has designated the portion of SR 89 within its jurisdiction (SR 89 North) as a scenic corridor. The Town's Truckee 2040 General Plan even contains policies to regulate the visual appearance and location of development along SR 89 North (Truckee 2040, Policy CC-1.3 Scenic Corridor Standards for New Development). Given their wonderful aesthetic qualities, Placer County should designate State Route 89 and Highway 267 as scenic corridors, and the DEIR should certainly consider potential aesthetic impacts that may result from additional density/development potential at Sites 44, 45, 68, and 69.

15-7

Additionally, regarding Sites 68 and 69, we would argue that there could be a significant impact on scenic resources if these parcels were developed with high-density and tall building heights along the river corridor. These sites can be viewed from public areas, including California Department of Fish and Wildlife Land, I-80 (another Town of Truckee-designated scenic corridor), the Truckee River, Truckee Springs open space easement, and Hilltop protected open space. Excessively tall buildings would not make sense in this location. The Truckee River is a scenic and ecologically important resource that needs thoughtful planning and visual protection, not large buildings that would degrade the viewshed. Light pollution is another environmental concern with dense housing along this corridor, which the DEIR failed to evaluate.

15-8

After the Town of Truckee adopted the Truckee 2040 General Plan last May, they initiated the River 2 River (R2R) Revitalization Steering Committee to begin a new action plan for the Truckee River Revitalization effort, which is a 20-year-old vision that never was enacted. The new R2R committee is tasked with starting a

mountain area preservation

15-8 con't

new community planning process and vision for a reimagined West and East River Street Corridor. The committee held its first meeting in July and has been meeting regularly since then. How is Placer County engaging with the Town of Truckee knowing the significance of Sites 68 and 69 adjacent to the R2R plan area? The two jurisdictions need to collaborate and ensure that development in this corridor meets a set of shared goals. Placer County should initiate a conversation with the Town of Truckee and join the committee to understand the future of West River Street and how to collaborate on this opportunity site and the river corridor. Placer County can align with a new vision for housing, industrial, mixed-use, public space, and revitalization in this special plan area by working with the Town of Truckee. MAP Executive Director serves on this committee, and it is envisioned to be a multi-year process, so it is best to engage now, while early in the process.

15-9

Site 44 (Impacts Related to Transportation, Biological Resources, Incompatible Land Uses, and Cumulative Impacts):
On behalf of MAP, we would like to provide some context and history related to Site 44. In the early 2000s, Placer County revised the Martis Valley Community Plan, which had originally envisioned thousands of luxury housing units in that planning area. The Plan was challenged by MAP and other environmental groups on the grounds of placing too much density within a significant watershed, wildlife migration corridor, and high-severity fire danger zone.

While Site 44 is next to existing land uses, such as the Donner Veterinary Office, it is also adjacent to protected open space that was negotiated by MAP and in an area that experiences very high traffic volumes, with thousands of units nearby in Schaffer Mills, Martis Camp, Lahontan, Hopkins Village, and the Tahoe Expedition Academy. Existing conditions along this corridor have drastically changed in the last handful of years, with extreme congestion year-round due to a combination of increased visitation at the ski resorts, luxury housing, the

mountain area preservation

15-9 con't

Truckee Tahoe Airport, and commercial uses at Planned Community 3 (PC3), such as the Raley's. Two more phases are approved as part of PC3, including 200+ residential units and 33,000 square feet of commercial space. Is this really the best location for high-density housing?

15-10

The DEIR notes that a portion of the Truckee Tahoe Airport's overflight zone is within the County boundaries and Site 44 is within its influence area. Multi-family residential is a compatible use, but given that the property is located next to protected open space and in an area with high traffic volumes and congestion due to the heavy use by the Truckee Tahoe Airport District (TTAD), workers and residents serving Martis Camp, Schaffer Mills, Lahontan, Northstar, and the ever-growing tourism VMTs that come to Tahoe year-round, this is not an ideal location for high-density development. It is unclear in the DEIR whether TTAD was consulted as part of the environmental review process, but as a regional land agency with extensive open space easements and noise and annoyance abatement in the Martis Valley for flight arrivals and departures, they may find the proposed additional density and height at Site 44 as a non-compatible use due to the cumulative impacts from the 200+ units that have been approved and remain unbuilt at PC3, within the Town of Truckee boundary. When cumulative impacts, adjacent land uses, and existing conditions are considered, Site 44 is inappropriate for high-density housing.

15-11

Site 45 (DEIR Inaccuracies; Impacts on Transportation, Wildfire and Evacuation, VMT, Water Quality, and Population and Housing):

Site 45 needs to be correctly classified in the DEIR on Tables 3-2, 12-1, and 12-2. Those tables show that the existing site use is recreation when the existing site use is workforce housing. This site in Alpine Meadows, just off Highway 89, can be challenging to access due to extreme congestion in this travel corridor. It could be a good location for higher-density workforce housing to support nearby ski

mountain area preservation

15-11 con't | resorts, including Alpine Meadows and Palisades, but special considerations are also warranted.

15-12 | The DEIR should have included a comprehensive analysis of potential increases in vehicle miles traveled (VMT) through this heavily trafficked area and any associated impacts on wildfire evacuation risks or Lake Tahoe water quality related to the deposition of sediments. Instead, the DEIR indicates that a VMT analysis would be required as part of the site development process and states that impacts on fire protection and wildfire are less than significant. We would argue that the cumulative impacts on evacuation and wildfire risk of this proposed upzone with other reasonably foreseeable projects, such as the Alpine Sierra Subdivision (38 unbuilt but approved single-family dwellings on Alpine Meadows Road) and the Revised Village at Palisades Specific Plan, could be significant and require further analysis.

15-13 | Additionally, due to its proximity to the ski resorts, redevelopment of this site could result in the construction of luxury condos and market-rate housing if restrictions are not put in place to ensure that the units are affordable for low-income families and workers. To truly address the housing crisis, deed restrictions are needed.

15-14 | **Sites 68 & 69 (Impacts on Population and Housing)**
Sites 68 and 69 are located between West River St. and Highway 89, adjacent to the incorporated Town of Truckee boundary and close to the Truckee River. Currently, these sites serve as low-income housing for mobile home residents and should continue to function as affordable housing. Displacement of existing low-income residents not only runs counter to the goals of the Housing Program but is also socially unjust and will not likely satisfy HCD requirements. Given these considerations, we do not support further consideration of upzoning these properties, even if the owners are willing.

7

mountain area preservation

15-14 con't

The DEIR notes that the development of these sites could result in the displacement of existing people or housing. However, it argues that new housing could be found within the existing supply, so the potential impact is less than significant. This statement disregards the reality of housing in the Truckee Tahoe region. The 2023 Housing Needs Assessment Update for Mountain Housing Council identified a need for 8,197 homes to satisfy unmet demand in Eastern Placer County and Truckee. Indeed, the very reason Placer County is undergoing this rezone process is due to a lack of affordable and workforce housing, so to dismiss the issue of displacement based on the assumption that new housing could be found within the existing supply is not only inaccurate, but also dismisses a key social and environmental justice concern and runs counter to the very premise of this process.

General Concerns

15-15

We understand the need to provide additional development potential based on state laws and RHNA requirements. However, Placer County is only required to provide an additional 1,671 units. If all candidate sites were rezoned and developed, the sites would accommodate a minimum of 5,002 units and a maximum of 7,503 units. That is not a conservative approach; it is an excessive pro-growth approach and not mindful of the resources and constraints in Truckee Tahoe or the rest of rural Placer County.

The proposed rezones far exceed the requirement and could have lasting impacts on the communities in which they are located. Properties could be developed with buildings as tall as 55' and up to 90' with the density bonus. In urban infill areas, these heights may make sense. In the rural communities of Truckee Tahoe, these heights would be egregious and out of character with their surroundings, with the potential to scar mountain and river views. MAP is supportive of moving forward with a smaller number of properties with

mountain area preservation

15-15 con't

consideration of each property's site characteristics and surrounding context. Once properties are upzoned, it is next to impossible to reverse the action, so MAP urges Placer County to view the potential upzones in the Truckee Tahoe region with a special lens that considers the area's unique constraints and permanently remove Sites 44, 68, and 69 from consideration.

Sincerely,

Alexis Ollar, MAP Executive Director

Sophia Heidrich, MAP Advocacy Director

LETTER 15: ALEXIS OLLAR, MOUNTAIN AREA PRESERVATION

Response to Comment 15-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 15-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 15-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 15-4
While the list of properties currently being considered by the Board of Supervisors for rezoning has been refined from the original proposed list of 72 properties, the list of properties evaluated by the Draft EIR covers all properties that were considered for potential rezoning.

As noted by the comment, the Board of Supervisors directed staff to continue consideration of 19 of the 72 sites for the rezone program. The governing body's decision to reduce the number of sites under consideration does not require a more targeted or focused CEQA analysis, nor does it require a new alternative to be developed that exactly matches the sites the Board directed staff to continue to consider. The Draft EIR includes two reduced sites alternatives that consider at a program level how impacts of the project would be reduced through site reduction. Further, the full analysis in the Draft EIR ensures that all sites have been adequately analyzed and discloses the full extent of potential impact, regardless of what composition the list ultimately takes.

The sites were evaluated based on the direction provided by the Board of Supervisors and their ability to meet the project objectives. The Draft EIR identifies ways in which the significant effects of the proposed project might be minimized and identifies alternatives to the proposed project.

CEQA Guidelines section 15124(b) requires an EIR's project description to describes the purpose of the proposed project including a statement of the objectives sought by the proposed project: "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project."

Response to Comment 15-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 15-6
As noted in Section I, Aesthetics, of the Initial Study prepared for the project, according to the California Scenic Highway Mapping System, officially designated State Scenic Highways are not located within Placer County. While State Route (SR) 28, SR 49, and SR 89 are Eligible State Scenic Highways, the roadways have not been officially designated. The Initial Study concluded that established scenic vistas are not located on or adjacent to the potential rezone sites, the proposed project would not have a substantial adverse effect on a scenic vista, no impact would occur, and mitigation measures would not be required.

Response to Comment 15-7

Please see Response to Comment 15-6. In addition, as discussed in Section I, Aesthetics, of the Initial Study prepared for the proposed project, impacts related to light pollution were determined to be less than significant with implementation of Mitigation Measure I-1, which requires the submittal of a lighting plan for future project demonstrating that proposed lighting is Dark-Sky compliant, as specified by the International Dark-Sky Association.

Response to Comment 15-8

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 15-9

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 15-10

The Truckee Tahoe Airport District received the Notice of Availability of the Draft EIR.

Response to Comment 15-11

In response to the comment, Table 3-2, Table 12-1, and Table 12-2 have been revised, as follows:

Table 3-2
Proposed Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
1	474-130-001-000	2575 PFE Road	4.3	1	Residence
2	474-130-002-000	Antelope Road	3.7	1	Undeveloped
3	473-010-012-000	8230 Brady Lane	4.4	1	Undeveloped
4	473-010-013-000	8230 Brady Lane	10.3	1	Undeveloped
5	473-010-014-000	8230 Brady Lane	4.5	1	Residence
6	473-010-020-000	8230 Brady Lane	2.7	1	Residence
7	473-020-015-000	Vineyard Road	2.7	1	Undeveloped
8	473-010-001-000	8101 East Drive	6.9	1	Agriculture
9	023-240-077-000	8830 Cook Riolo Road	2.2	1	Residential Accessory Structure
10	023-240-038-000	8830 Cook Riolo Road	2.4	1	Single-Family Residential
11	019-191-020-000	5780 13th Street	0.8	2	Undeveloped
12	019-211-013-000	4881 Riosa Road	1.1	2	Undeveloped
13	043-060-032-000	3066 Penryn Road	2.6	3	Undeveloped
14	032-191-020-000	2221 Taylor Road	0.5	3	Undeveloped

Table 3-2
Proposed Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
15	032-220-010-000	2084 Sisley Road	0.4[1]	3	Undeveloped
16	032-220-051-000	7365 English Colony Way	4.8	3	Undeveloped
17	043-060-045-000	3130 Penryn Road	4.7	3	Undeveloped
18	043-060-048-000	Hope Way	6.1	3	Undeveloped
19	047-150-012-000	7100 Douglas Boulevard	1.6	4	Undeveloped
20	047-150-042-000	7190 Douglas Boulevard	1.4	4	Undeveloped
21	043-072-018-000	Penryn Road	1.2	4	Undeveloped
22	043-072-019-000	Penryn Road	1.0	4	Undeveloped
23	046-090-042-000	Cavitt Stallman Road	3.2	4	Undeveloped
24	048-132-071-000	Eureka & Auburn-Folsom	1.8	4	Residence
25	048-132-073-000	8950 Auburn Folsom Road	1.7	4	Multifamily Residential
26	047-150-053-000	8989 Auburn Folsom Road	17.4	4	Undeveloped
27	047-150-015-000	7130-7160 Douglas Boulevard	0.9	4	Commercial
28	047-150-016-000	7130-7160 Douglas Boulevard	0.8	4	Commercial
29	468-060-019-000	3865 Old Auburn Road	4.8	4	Single-Family Residential
30	048-084-033-000	5890 Granite Lake Drive	2.7	4	Undeveloped
31	048-630-023-000	5890 Granite Lake Drive	4.0	4	Undeveloped
34[2]	038-104-095-000	Canal Street	12.8	5	Undeveloped
35	052-071-001-000	Masters Court	2.9	5	Storage
36	052-071-039-000	Willow Creek Drive	0.8	5	Undeveloped
37	053-103-026-000	Bowman Road	1.1	5	Mostly Undeveloped & Parking Lot
38	053-104-004-000 & 053-104-005-000	Channel Hill	2.3	5	Undeveloped
39	054-143-016-000	Dolores Drive	3.9	5	Undeveloped

Table 3-2
Proposed Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
40	054-143-018-000	13445 Bowman Road	1.0	5	Mostly Undeveloped & Parking Lot
41	054-181-029-000	395 Silver Bend Way	2.0	5	Undeveloped
42	076-420-063-000	Graeagle Lane	3.1	5	Mostly Undeveloped & Parking Lot
43	076-420-064-000	Dry Creek & Highway 49	0.6	5	Undeveloped
44	080-270-067-000	Highway 267	1.0	5	Undeveloped
45	095-050-042-000	235 Alpine Meadows Road	1.6	5	~~Recreation~~ Workforce Housing
46	054-171-034-000	Silver Bend Way	2.3	5	Parking Lot
47	054-171-027-000	355 Silver Bend Way	3.0	5	Residence
48	054-171-049-000	Silver Bend Way	0.8	5	Undeveloped
49	038-104-094-000	12150 Luther Road	2.2	5	Undeveloped
50	054-171-033-000	180 Silver Bend Way	0.8	5	Undeveloped
51	052-043-009-000	Plaza Way	1.8	5	Undeveloped
52	054-143-019-000	13431 Bowman Road	3.2	5	Lodging
53	053-103-054-000	Mill Pond Road	1.9	5	Undeveloped
54	073-170-053-000	17905 Applegate Road	1.3	5	Undeveloped
55	073-170-055-000	Applegate Road	1.0	5	Undeveloped
56	052-042-015-000	Plaza Way	0.9	5	Undeveloped
57	052-042-016-000	Plaza Way	1.2	5	Undeveloped
58	076-112-094-000	4960 Grass Valley Highway	13.0	5	Undeveloped
59	038-104-085-000	1451 Lowe Lane	1.3	5	Apartments
60	038-113-031-000	1185 Edgewood Road	1.9	5	Undeveloped
61	076-092-008-000	No Address On File	2.2	5	Undeveloped

Table 3-2
Proposed Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
62	038-121-067-000	Edgewood Road/Blitz Lane	1.3	5	Undeveloped
63	038-104-082-000	1475 Lowe Lane	0.6	5	Single-Family Residential
64	038-121-030-000	11764 Edgewood Road	4.2	5	Single-Family Residential
65	076-070-002-000	4362 Grass Valley Highway	1.8	5	Single-Family Residential
66	076-070-068-000	4390 Grass Valley Highway	0.8	5	Multi-Family Residential
67	076-112-084-000	4950 Grass Valley Highway	1.1	5	Single-Family Residential
68	080-020-013-000	10715 Highway 89	2.3	5	Mobile Homes
69	080-020-014-000	10715 River Road	1.6	5	Mobile Homes
70	051-120-068-000	3120 Deseret Drive	8.6	5	House of Worship
71	054-290-064-000	Lincoln Way Property 1	2.9	5	Undeveloped
72	054-290-065-000	Lincoln Way Property 2	4.5	5	Undeveloped
73	038-121-068-000	920 Blitz Lane	10.1	5	Single-Family Residential
74	052-171-005-000	Bell Road	15.8	5	Undeveloped
		Total acres	**235.1**	-	-

[1] This site is adjacent to the 4.8-acre site identified by APN 032-220-051-000. If both sites are rezoned, a 5.3-acre area would be available for development.
[2] Sites #32 and #33 have been removed from this list due to Assembly Bill (AB) 52 tribal consultation efforts conducted by Placer County for the proposed project.

Table 12-1
Reduced Sites (Willing Property Owners Only) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
3	473-010-012-000	8230 Brady Lane	4.4	1	Undeveloped
4	473-010-013-000	8230 Brady Lane	10.3	1	Undeveloped
5	473-010-014-000	8230 Brady Lane	4.5	1	Residence
7	473-020-015-000	Vineyard Road	2.7	1	Undeveloped
8	473-010-001-000	8101 East Drive	6.9	1	Agriculture

Table 12-1
Reduced Sites (Willing Property Owners Only) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
9	023-240-077-000	8830 Cook Riolo Road	2.2	1	Residential Accessory Structure
10	023-240-038-000	8830 Cook Riolo Road	2.4	1	Single-Family Residential
11	019-191-020-000	5780 13th Street	0.8	2	Undeveloped
12	019-211-013-000	4881 Riosa Road	1.1	2	Undeveloped
13	043-060-032-000	3066 Penryn Road	2.6	3	Undeveloped
14	032-191-020-000	2221 Taylor Road	0.5	3	Undeveloped
16	032-220-051-000	7365 English Colony Way	4.8	3	Undeveloped
17	043-060-045-000	3130 Penryn Road	4.7	3	Undeveloped
18	043-060-048-000	Hope Way	6.1	3	Undeveloped
23	046-090-042-000	Cavitt Stallman Road	3.2	4	Undeveloped
24	048-132-071-000	Eureka & Auburn-Folsom	1.8	4	Residence
25	048-132-073-000	8950 Auburn Folsom Road	1.7	4	Multifamily Residential
26	047-150-053-000	8989 Auburn Folsom Road	17.4	4	Undeveloped
29	468-060-019-000	3865 Old Auburn Road	4.8	4	Single-Family Residential
30	048-084-033-000	5890 Granite Lake Drive	2.7	4	Undeveloped
34	038-104-095-000	Canal Street	12.8	5	Undeveloped
35	052-071-001-000	Masters Court	2.9	5	Storage
42	076-420-063-000	Graeagle Lane	3.1	5	Mostly Undeveloped & Parking Lot
43	076-420-064-000	Bowman Road	0.6	5	Undeveloped
45	095-050-042-000	235 Alpine Meadows Road	1.6	5	~~Recreation~~ Workforce Housing
47	054-171-027-000	355 Silver Bend Way	3.0	5	Residence
48	054-171-049-000	Silver Bend Way	0.8	5	Undeveloped

Table 12-1
Reduced Sites (Willing Property Owners Only) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
49	038-104-094-000	12150 Luther Road	2.2	5	Undeveloped
50	054-171-033-000	180 Silver Bend Way	0.8	5	Undeveloped
51	052-043-009-000	Plaza Way	1.8	5	Undeveloped
53	053-103-054-000	Mill Pond Road	1.9	5	Undeveloped
56	052-042-015-000	Plaza Way	0.9	5	Undeveloped
58	076-112-094-000	4960 Grass Valley Highway	13.0	5	Undeveloped
59	038-104-085-000	1451 Lowe Lane	1.3	5	Apartments
60	038-113-031-000	1185 Edgewood Road	1.9	5	Undeveloped
61	076-092-008-000	No Address On File	2.2	5	Undeveloped
62	038-121-067-000	Edgewood Road/Blitz Lane	1.3	5	Undeveloped
63	038-104-082-000	1475 Lowe Lane	0.6	5	Single-Family Residential
64	038-121-030-000	11764 Edgewood Road	4.2	5	Single-Family Residential
68	080-020-013-000	10715 Highway 89	2.3	5	Mobile Homes
69	080-020-014-000	10715 River Road	1.6	5	Mobile Homes
71	054-290-064-000	Lincoln Way Property 1	2.9	5	Undeveloped
72	054-290-065-000	Lincoln Way Property 2	4.5	5	Undeveloped
73	038-121-068-000	920 Blitz Lane	10.1	5	Single-Family Residential
74	052-171-005-000	Bell Road	15.8	5	Undeveloped
		Total acres	**179.7**	-	-

Table 12-2
Reduced Sites (Smaller Unit Buffer) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
7	473-020-015-000	Vineyard Road	2.7	1	Undeveloped

Table 12-2
Reduced Sites (Smaller Unit Buffer) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
8	473-010-001-000	8101 East Drive	6.9	1	Agriculture
9	023-240-077-000	8830 Cook Riolo Road	2.2	1	Residential Accessory Structure
10	023-240-038-000	8830 Cook Riolo Road	2.4	1	Single-Family Residential
11	019-191-020-000	5780 13th Street	0.8	2	Undeveloped
17	043-060-045-000	3130 Penryn Road	4.7	3	Undeveloped
18	043-060-048-000	Hope Way	6.1	3	Undeveloped
25	048-132-073-000	8950 Auburn Folsom Road	1.7	4	Multifamily Residential
26	047-150-053-000	8989 Auburn Folsom Road	17.4	4	Undeveloped
29	468-060-019-000	3865 Old Auburn Road	4.8	4	Single-Family Residential
34	038-104-095-000	Canal Street	12.8	5	Undeveloped
35	052-071-001-000	Masters Court	2.9	5	Storage
42	076-420-063-000	Graeagle Lane	3.1	5	Mostly Undeveloped & Parking Lot
43	076-420-064-000	Bowman Road	0.6	5	Undeveloped
45	095-050-042-000	235 Alpine Meadows Road	1.6	5	~~Recreation~~ Workforce Housing
47	054-171-027-000	355 Silver Bend Way	3.0	5	Residence
51	052-043-009-000	Plaza Way	1.8	5	Undeveloped
53	053-103-054-000	Mill Pond Road	1.9	5	Undeveloped
68	080-020-013-000	10715 Highway 89	2.3	5	Mobile Homes

Table 12-2
Reduced Sites (Smaller Unit Buffer) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
69	080-020-014-000	10715 River Road	1.6	5	Mobile Homes
		Total acres	**81.3**	-	-

The foregoing revisions to the Draft EIR are provided for clarification purposes in response to public comment and do not affect the adequacy of the Draft EIR analysis.

Response to Comment 15-12
Please see Response to Comment 14-6.

Response to Comment 15-13
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 15-14
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 15-15
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 16

PLAN STEWARD

March 18, 2024

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

Re: Housing Element Sites Rezone Project (PLN22-00476) Draft Environmental Impact Report
Site 23 – Sierra College Boulevard

On behalf of Bayside Covenant Church, Inc. (Bayside), we are writing with comments on the Housing Element Sites Rezone Draft Environmental Impact Report (Draft EIR).

16-1

Bayside Covenant Church, Inc. owns APN 046-090-042-0000 east of Sierra College Boulevard and west of Cavitt Stallman Road, which is Rezone Project Site 23. Site 23 is a 3.2-acre *portion* of APN 046-090-042-0000, as depicted on the attached exhibit. The site is south of a 1.25-acre open space preserve and north of Bayside Fields and the Bayside Church campus. Miners Ravine Drive is southwest of the site.

The Site 23 boundaries depicted in the Draft EIR are inaccurate[1] and overstate the parcel limits. The Draft EIR depicts the site as north of Olive Ranch Road. The site is north of Lawrence Drive and south of the open space preserve. Throughout the DEIR, revise the site boundary to correspond to the shaded area on the attached exhibit.

The Site Inventory lists Site 23 on Cavitt Stallman Road. Bayside will restrict all future vehicular access to the site to Sierra College Boulevard and, if required, allow only emergency vehicle access on Cavitt Stallman Road.

Thank you for the opportunity to review the Draft EIR.

Sincerely,

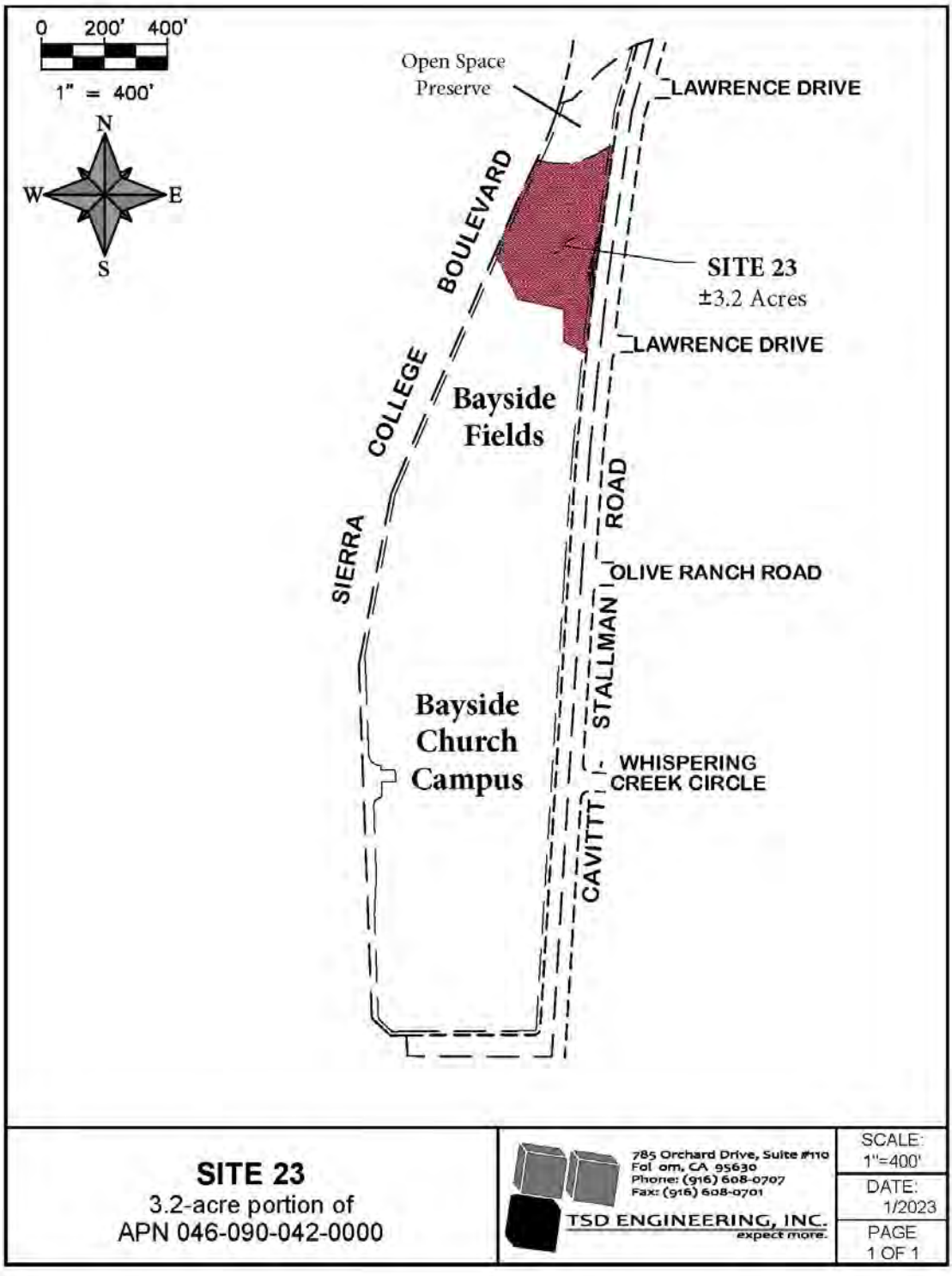
Kris Steward

Enclosure: Site 23 Exhibit
NOP Comment Letter, November 27,2023

cc: John Stewart, Bayside Church

[1] The Site 23 exhibit in Appendix G (Biological Resources Assessment) is accurate. See Appendix G, Exhibit E, PDF page 287.

916-425-7906 ▪ 5716 Folsom Boulevard #339, Sacramento, CA 95819


0 200' 400'
1" = 400'
N
W
E
S
Open Space Preserve
LAWRENCE DRIVE
BOULEVARD
SITE 23
±3.2 Acres
LAWRENCE DRIVE
COLLEGE
Bayside Fields
SIERRA
ROAD
OLIVE RANCH ROAD
STALLMAN
Bayside Church Campus
WHISPERING CREEK CIRCLE
CAVITT
SITE 23
3.2-acre portion of
APN 046-090-042-0000
785 Orchard Drive, Suite #110
Folsom, CA 95630
Phone: (916) 608-0707
Fax: (916) 608-0701
TSD ENGINEERING, INC.
expect more.
SCALE: 1"=400'
DATE: 1/2023
PAGE 1 OF 1

PLAN STEWARD

November 27, 2023

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

Re: Housing Element Sites Rezone Project – Notice of Preparation
Site 23 – Sierra College Boulevard

Dear Ms. Herrington,

On behalf of Bayside Church (Bayside), we are writing with comments on the County's proposed Housing Element Sites Rezone Project (Rezone Project) Notice of Preparation (NOP).

Bayside Covenant Church, Inc. owns APN 046-090-042-0000 east of Sierra College Boulevard and west of Cavitt Stallman Road. Rezone Project Site 23 is a 3.2-acre *portion* of the 17.3-acre APN 046-090-042-0000, as depicted on the attached exhibit. The site is south of a 1.25-acre open space preserve and north of Bayside Fields and the Bayside Church campus. Miners Ravine Drive is southwest of the site.

The Site 23 boundaries depicted in NOP Figure 4 (page 10) and Appendix A[1] are inaccurate. In the environmental impact report, please adjust the site boundary to correspond to the shaded area on the attached exhibit. The NOP Site Inventory lists Site 23 on Cavitt Stallman Road. Bayside will restrict all future vehicular access to the site to Sierra College Boulevard and, if required, an emergency vehicle access on Cavitt Stallman Road.

Thank you for the opportunity to review the NOP.

Sincerely,

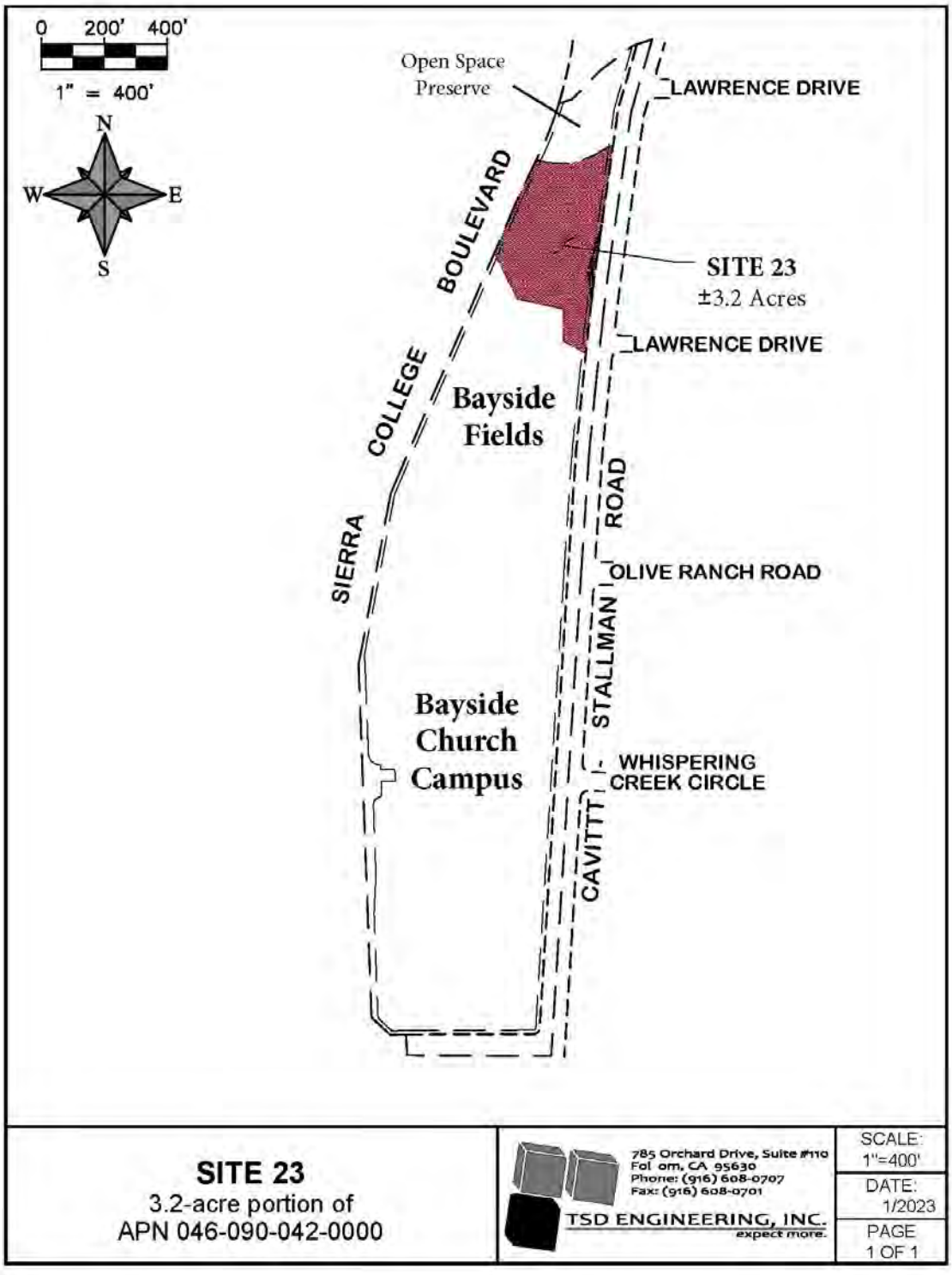
Kris Steward

Enclosure: Site 23 Exhibit

cc: John Stewart, Bayside Church

[1] The NOP Appendix A (Site Inventory) pages are not numbered. The exhibit is on page 146 of the NOP PDF.

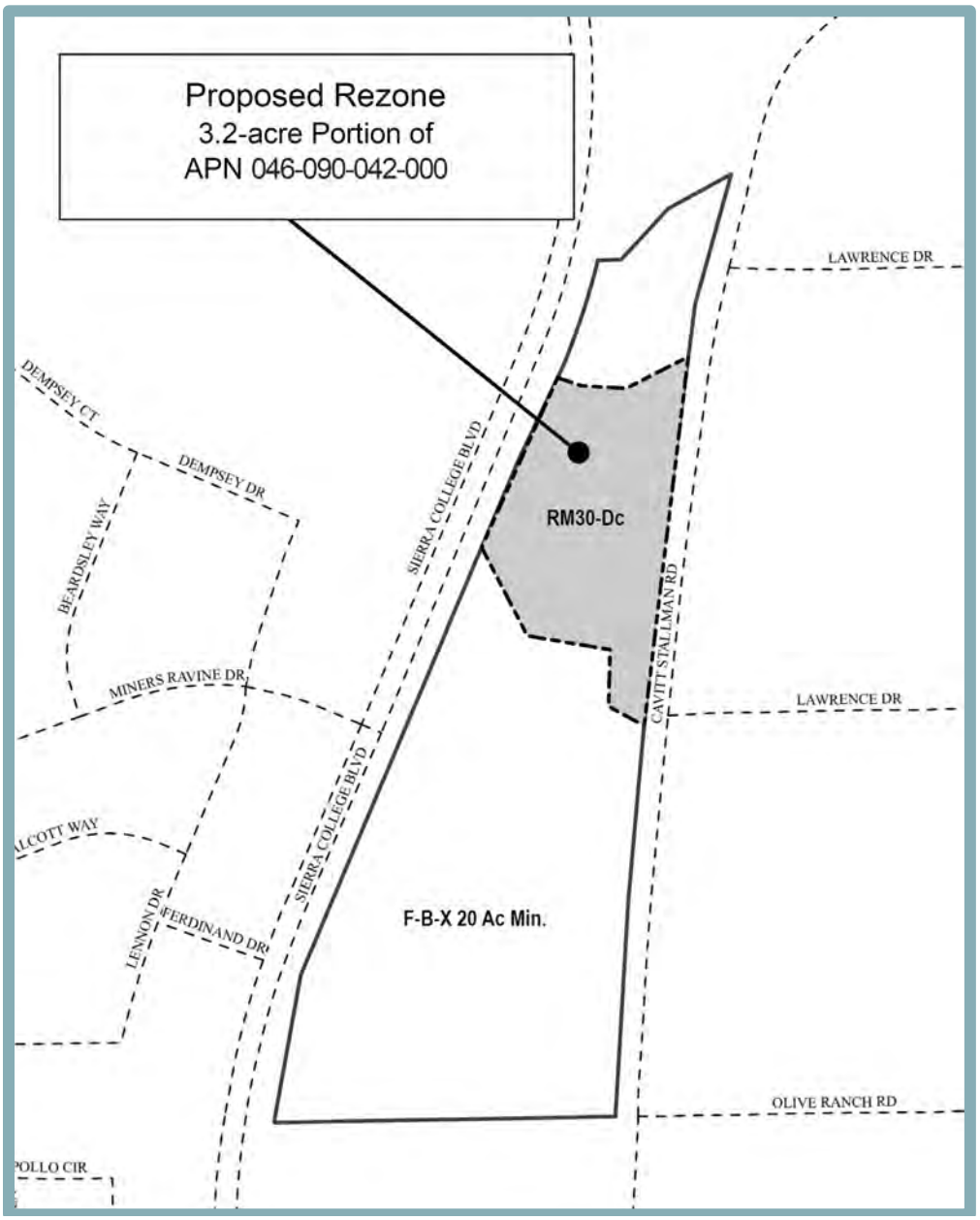
916-425-7906 ▪ 5716 Folsom Boulevard #339, Sacramento, CA 95819


0 200' 400'
1" = 400'
N
W
E
S
Open Space Preserve
LAWRENCE DRIVE
BOULEVARD
SITE 23
±3.2 Acres
LAWRENCE DRIVE
COLLEGE
Bayside Fields
SIERRA
ROAD
OLIVE RANCH ROAD
STALLMAN
Bayside Church Campus
WHISPERING CREEK CIRCLE
CAVITT
SITE 23
3.2-acre portion of
APN 046-090-042-0000
785 Orchard Drive, Suite #110
Folsom, CA 95630
Phone: (916) 608-0707
Fax: (916) 608-0701
TSD ENGINEERING, INC.
expect more.
SCALE: 1"=400'
DATE: 1/2023
PAGE 1 OF 1

LETTER 16: KRIS STEWARD, BAYSIDE CONVENT CHURCH, INC.

Response to Comment 16-1

It is noted that Rezone Site #23 consists of a 3.2-acre portion of Assessor's Parcel Number (APN) 046-090-042-000, not the entire parcel. As such, in response to the comment, Appendix C, Site Inventory Forms, to the Draft EIR, is hereby revised to include the following figure:



The foregoing revision to the Draft EIR is provided for clarification purposes in response to public comment and does not affect the adequacy of the Draft EIR analysis.

Letter 17

From: Accounts Payable
To: Placer County Environmental Coordination Services
Subject: Housing Element Sites Rezoning
Date: Monday, March 18, 2024 2:44:18 PM

Dear Sirs/Madams:

As a senior administrator for a large franchise group, I am saddened that I cannot convince my employees to move closer to our office. Instead, I am presented with capable people who are already fatigued after a minimum 30-minute commute to get to our office.

I wish I could offer suggestions for affordable housing near our office and our business locations, but I cannot. There simply is no place affordable for the 20 - 30-year-olds that are the majority of our employees.

17-1

Our senior management who have purchased homes have done so out of this area, and hence, must commute.

Placer County needs to take the lead by approving the rezoning of the parcels described for higher density development. Doing so will start a trend of affordable housing alternatives, enabling families to put down roots and continue their employment locally.

Enable family cohesion. Enable a diverse and thriving business community.

Please approve the Housing Element Rezoning.

Regards,

Munir Management Corp.
9281 Sierra College Blvd.
Roseville, CA 95661
P: 916.332.2450
F: 916.332.2480

LETTER 17: MUNIR MANAGEMENT CORP

Response to Comment 17-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Signature M Reddy

Print name MOOLA P. REDDY

Email Address

MPREDDY 1946 @ YAHOO.COM

Signature M G Vijaya Reddy

Print name VIJAYA REDDY

Email Address

Vijaya33@yahoo.com

Signature

Print name

Email Address

12

Letter 18

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Site 26
Comments and Questions

Acronyms utilized throughout the comments and questions.

- Housing Element Program HE-1 (HE-1)
- Regional Housing Needs Allocation (RHNA)
- County Residential Multifamily 30 (RM30)
- Granite Bay General Plan, new land use designation "High Density Residential 20/30" (HDR 20/30)
- California Environmental Quality Act (CEQA)
- Rezone project is comprised of 72 specific sites as included in the Draft Environmental Impact Report (EIR), Date 2.2.24
- Vehicle Miles Traveled (VMT)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

I. Questionable objectives of HE-1, Project Description as they pertain to RM-30 or HDR 20/30.

18-1

1. "Support Employment growth by increasing availability of housing that meets the needs of the workforce."(pg3-2, Draft EIR,) How does this rezone of site 26 materially impact employment growth? Employment local to site 26 is primarily retail, not administrative or work of a professional nature, hence what is the linkage to site 26 rezone and development to employment growth specifically? VMT would not be decreased due to increased housing density; "Reduce vehicle miles traveled by encouraging infill development near employment centers and services."(pg. 3-2, Draft EIR) Employment and major services are located over 7 miles away close to the I-80 and I-50 corridors. That would be a minimum of 14 miles a day times the number of residents needing to commute just to get to those corridors. Most likely, employment would be more miles away.

II. Questions relating to Employment, VMT and Pedestrian traffic.

18-2

2. "Reduce vehicle miles traveled by encouraging infill development near employment centers and services." (pg. 3-2, Draft EIR) As mentioned in my previous question to employment growth,

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-2 con't

3. there are no significant employers (large employers) within close proximity to site 26. Therefore, potential residents of site 26 would be required to travel by vehicle to employment centers primarily located near the I-80 corridor and possibly the i-50 corridor. This would increase VMT based on a higher density of population, this would significantly increase traffic on Auburn-Folsom Road and Douglas Blvd.

18-3

4. Tangent to the employment and VMT issue is the fact that there is a public junior high school within feet of site 26. Currently, the traffic pattern is very hectic at the usual school hours of 8:00 a.m. and 2:30 p.m.; Fuller Road which leads to the junior high is generally packed from the intersection of Fuller and Auburn Folsom road. Further, traffic along Auburn Folsom is negatively impacted as cars seek to merge onto Auburn Folsom Road where the signal delays traffic through the Auburn Folsom corridor. Exacerbating the traffic problem, due to the increased density in housing, there would be increased pedestrian traffic utilizing the signal at Fuller and Auburn Folsom road. This would increase traffic backed up to Eureka Road which is a T intersection with Auburn Folsom road. Currently, traffic spills down to the Eureka intersection; this increased pedestrian traffic will increase the backlog of traffic on Auburn Folsom road and increase noise as well as pollution. How is the EIR addressing this issue as well as mitigation?

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-4

5. The draft EIR, pg. 8-29, within Section 8-Transportation section, the EIR states "The proposed project does not include any site-specific development plans, designs or proposals. Thus, the development of specific rezone sites cannot be analyzed for adequacy of emergency access at this time." Further, the draft EIR states, "Additional vehicles associated with the rezone sites could increase delays for emergency response vehicles during peak commute hours." The following mitigation response to these two negative outcomes in the analysis, such as "sirens", "Yield, right of way" are not even close to a gold standard of countermeasures which would negate the negative impact of site 26 to emergency response vehicles need for access through Auburn Folsom road and Fuller drive areas. Is site 26 development endangering lives due to this impact?

18-5

6. The California Department of Transportation (DOT) sent a letter dated 12.15.2023 (ref# 03-PLA2023-01130), of great significance in the letter, it states, "Placer County has a plan to execute VMT studies, as well as preparing a programmatic level EIR. Once the VMT analysis and Programmatic level EIR have been completed, Caltrans will review and assess each parcel development, case-by-case, as development proposals are made."(pg. 2) We in the community would like to postpone any rezoning of site 26 or approval of development plans for

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-5 con't

site 26 until the community of Granite Bay has had an opportunity to review any Caltrans analysis and report for those analysis and reports that pertain to site 26. Wouldn't this course of action be prudent in assessing the impact of rezoning and any development plans for site 26?

18-6

7. Regarding the VMT analysis presented in Appendix I, CEQA, Transportation Impact Analysis (pg 55), we found no mention of Emergency Response Vehicles response times. With added congestion, seasonal factors as well as regular increased traffic due to school hours at Cavitt-Stallman Junior, increased traffic due to this site 26 plan (rezoning) would have a significant (negative) impact on emergency response vehicles access to those areas surrounding site 26. When seconds count in the Health & Safety in emergency medical response times, site 26 can only thwart the mission of saving lives and preventing serious health risks by our first responders.

18-7

8. Within the Granite Bay Community Plan, updated and approved by the board of Supervisors, July 2019; Section 10, "Recreation"; the following information is provided on page 160, "According to Folsom Lake State Recreation Area Resource Inventory, total park attendance in 2000 was 1.57 million. Of that, 508,000 accessed via the Granite Bay entrance and an additional 220,000 utilized Beals Point. Forty-six percent of users accessed the State Park

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-7 cont.

through Granite Bay." There is a need to update these attendance numbers, but it is only prudent to say that those numbers are far below what the park has been experiencing in the recent past or decade. What should be of concern is the VMT by visitors and consequential traffic congestion to the Folsom Lake which is accessed via Auburn Folsom Road and Douglas Blvd. Auburn Folsom Road borders one side of site 26, and Douglas Blvd. is approximately ½ mile away from site 26 and Fuller Drive, which is the other border of site 26.

18-8

9. Further contained within page 160 of section 10(Recreation) of the Granite Bay Community Plan, it states the following; "Capacity is a concern at Granite Bay, particularly during peak season weekends when the day use parking area and launch ramps at the launch ramps area fill by midday. There is one entrance to Granite Bay at Douglas Blvd. and one entrance to Beals Point at Oakhill Drive. Significant backups occur along the roadway and onto Auburn Folsom Road when the parking areas fill." Those of us who have lived in this area for some time can attest to the fact that once the 460 spaces at Beals Point fills up, visitors begin to park on the side of the road on Auburn Folsom road, Crown Point Vista (residential area, Oakhill Drive (residential area), Muir Way (residential area) and Fuller Drive. With an increased housing density at site 26, there

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-8 cont.

is a significant possibility of conflicts with future tenants at site 26 with the visitors to Lake Folsom, especially during peak season. Traffic congestion would be serious and this could reduce the right of way for first responders, causing lifesaving delays for services needed. I could not find where this dilemma is addressed in the Draft EIR. Please provide analysis and/or response how these issues would be addressed.

III. Questions/comments related to CEQA

18-9

10. The California code, Public Resources Code PRC 21159.25 "Infill Housing in Unincorporated Counties (CEQA) states "The project is consistent with general plan and zoning." As stated in the EIR, this rezoning project is not consistent with the general plan. Even though the general plan can be amended, what forum would be provided to amend the general plan to the community? If the general plan reflected the values and needs of the community, what would you consider a project that violates that plan by considering site 26? What other county property is available for HDR 20/30?

18-10

11. Within the same paragraph the CEQA also states, "The project site is less than 5 acres." It appears that the project site (site 26) contemplates rezoning 17 plus acres at site 26. What is being contemplated beyond the

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-10 Con't

single development which may occupy 5 of the 17 acres?

18-11

12. The California code, Public Resources Code PRC 21159.25 "Infill Housing in Unincorporated Counties (CEQA), "The project site will not cause significant effects relating to transportation, noise, air quality, greenhouse gas emissions, or water quality." As I mentioned in another comment/question, it appears that an increase in density at the intersection of Fuller and Auburn Folsom would significantly increase all the factors related to transportation as cautioned in CEQA. How is this being resolved within the guidelines of CEQA? What about seasonal traffic to Lake Folsom as it relates to Beals Point and Folsom Lake Maingate?

18-12

13. Continued within The California code, Public Resources Code PRC 21159.25 "Infill Housing in Unincorporated Counties (CEQA), "The project is within ½ mile of a major transit stop." If a transit stop is referring to a bus stop or light rail, I am not aware of any transit service available within ½ mile of site 26. How is the county reconciling this anomaly with CEQA?

IV. SB 423 Questions

18-13

14. Section 1. (e) of SB 423 states, "Least cost zoning law (Section 65913.1) of the government code. 65913.1 refers to housing development costs as a barrier to be overcome in producing

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-13 con't

affordable housing; of great concern is Health & Safety in this paragraph. Per the draft EIR, page 10-26, Health 7 Safety Element, Policy 3, it states; "Continue a program whereby new development pays the cost of new capital improvements necessary to provide the fire district with new fire stations, equipment and apparatus necessary to maintain the desired level of service, and to serve new development in the Granite Bay Area." On page 10-37 of the draft EIR, South Placer Fire Protection District(SPFPD) confirms that the district has insufficient staffing to adequately serve the new residences that could be considered reasonably foreseeable as a result of the proposed project. This points to increased capital cost outlays as well as increased need for staffing which would impact the cost of the project, directly or indirectly. Further, SPFPD states they have certain necessary equipment and facilities exist, but due to funding they are not operational. This would increase the cost of this project and would be necessary in ensuring the Health & Safety of all Granite Bay citizens. Before any rezoning or project being built, it would seem mandatory that these resource factors be addressed. Therefore, it would seem prudent to drop site 26 from the proposed rezone plan contemplated by this draft EIR.

18-14

15. As noted in comment/question #7, we are not aware of any Major Transit Stop within ½ mile

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-14 con't

of site 26; will this mandate the county introduce a Major Transit Stop? At what cost? Where would it be located? What tangent properties would be impacted?

V. Other Issues

18-15

16. Folsom Lake is a state recreational area, however development on site 26 could have a negative impact on the safety and health of the lake's environment as well as endangering wildlife, since there is no barrier to entering the lake from the junior high parking lot which is only feet away from the proposed development site 26. There is an unsupervised shoreline accessible through the parking lot of the junior high school, so it is foreseeable that during summertime, residents or friends of the residents may utilize the lake creating a possible danger since this area is not monitored. Further, there are no facilities such as restrooms in that section of the lake, causing an inconvenience as well as possible Health & Safety issues. Has the Department of Parks and Recreation been informed of this possibility? What liability could the State and Placer County incur for Health & Safety issues relating to this portion of the lake?

18-16

17. Finally, there are many "Goals" of the Granite Bay Community Plan that are violated by this proposed rezoning and development of site

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-16 con't

26. Most egregious of these violations being the potential lack of public stewardship directed to restoring, enhancing and maintaining the natural environment. Any development of site 26 would be out of character with the community within which site 26 resides. The values, priorities and quality of life standards promoted by the Granite Bay Community Plan are those of the citizens who make up the community. How is it Placer County can ignore, seek to change the Granite Bay Community Plan wholesale without seeking out the will of the citizens of Granite Bay? That will is already expressed in the existing Granite Bay Community Plan.

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

18-17 We, represented by the signatures to this comment and questions document respectfully request responses and answers individually or corporately from each Placer County Board Supervisor and all other Placer County departments and officials making decisions relative to the rezoning and development of Site 26 as noted and defined in the draft EIR.

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Print name

Email Address

Signature

DAN AHMAD

Print name

DAN@PEAKFIN.COM

Email Address

SIGNATURE PAGE(S)

Signature

Rachit Lohani

Print name

rachitlohani@yahoo.com

Email Address

(1)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Signature

Print name

MIKE A. CLARY

Email Address

MCLARY4839@yahoo.com

SIGNATURE PAGE(S)

Signature

Valerie D. Houghton

Print name

Validated@Surewest.net

Email Address

Signature

Gregory Houghton

Print name

Validated@Surewest.net

Email Address

Signature

(2)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Print name

Email Address

SIGNATURE PAGE(S)

Signature

LISA DAMON

Print name

LADAMON59@YAHOO.COM

Email Address

Signature

THERESA M. CLARY

Print name

freesac25@gmail.com

Email Address

(3)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Print name

Email Address

SIGNATURE PAGE(S)

Nabil Hamdan
Signature

Nabil Hamdan
Print name

nhamdan84@yahoo.com
Email Address

Rick
Signature

Rick Damon
Print name

ricklisadamon@yahoo.com
Email Address

Signature

(4)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Signature

Kirk J Staggs

Print name

KStaggs@pacbell.net

Email Address

LAN DELATORRE

Signature

Lan DeLaTorre

Print name

landelatorre@yahoo.com

Email Address

5

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

SIGNATURE PAGE(S)

Signature

Alan Bumgarner

Print name

abumgarn@gmail.com

Email Address

Signature

Print name

Email Address

Signature

(1)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Orna Ovadia
Signature

Orna Ovadia
Print name

obovadia@yahoo.com
Email Address

Boaz Ovadia
Signature

Boaz Ovadia
Print name

obovadia@hotmail.com
Email Address

Signature

Print name

Email Address

(4)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Signature

George Kievlan Jr 408-9689389
Print name

GKievlan@Sbcglobal.net
Email Address

408-918 9398
Signature

Joanne Kievlan
Print name

Email Address

Signature

Joseph De La Torre
Print name

jtradz@gmail.com
Email Address

8

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Soraya H Foutouhi

Print name

shfoutouhi@gmail.com

Email Address

Signature

Ehssan Ghassemi

Print name

ehssan@@gmail.com

Email Address

Signature

Print name

Email Address

Signature

(9)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Maya Reddy
Signature

Maya Reddy
Print name

mayareddy345@gmail.com
Email Address

Signature

Print name

Sureicha Reddy
Email Address

Sunreddy100@gmail.com
Signature

Print name

VINAY REDDY
Email Address

VREDDY@SPINENERVE.COM.

10

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Signature

Robin Saros
Print name

925 395 7606
Email Address

Signature

Print name

Email Address

Signature

Print name

Email Address

(11)

LETTER 18: PLACER COUNTY RESIDENTS

Response to Comment 18-1
The County disagrees with the premise of this comment that workforce housing should only be provided for workers in the administrative or professional fields. In addition, as shown in Table 8-3 of the Draft EIR, Rezone Site #26 is below the Baseline VMT Threshold of 26.26 with a Site Baseline 2022 VMT Metric of 24.58. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 18-2
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 18-1.

Response to Comment 18-3
Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 18-4
Please see Master Response 1 – Non EIR/Administrative Issues.

Response to Comment 18-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 18-6
Response times are not generally considered an environmental impact unless they lead to a need for additional facilities to house additional staff. Rezone Site #26 falls within South Placer Fire Protection District (FPD). As discussed in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, the South Placer FPD has stated in a personal communication that if adequate funding was available to reopen the two foregoing stations, the district would be capable of providing adequate fire protection services to the rezone sites located within the South Placer FPD. Although adequate physical facilities and equipment exist to serve the proposed development, due to lack of funding, such facilities are not currently operational. Payment of the fees would contribute towards providing the necessary funds to bring the currently closed fire stations and unmanned ladder truck back to operation.

Adequate funding is not a CEQA concern.

Response to Comment 18-7
Please see Response to Comment 18-3.

Response to Comment 18-8
Please see Response to Comment 18-3.

Response to Comment 18-9
Please see Master Response 3 – County-Owned Sites. In addition, because the proposed rezoning project is not consistent with the General Plan, the proposed project includes General Plan Amendments to do the following:

- Create a new General Plan Land Use designation called "High Density Residential 20/30" for the sites to allow for the increased density;
- Revisions to General Plan Table 1-1: Relationship Between General and Community Plan Land Use Designations;
- Revisions to Table 1-2: Development Standards by Land Use Designation; and
- Revisions to Table 1-3: General Plan Land Use Designations and Consistent Zoning Districts

The foregoing General Plan Amendments will be considered by the Board at the time of the rezonings.

Response to Comment 18-10
While the entirety of Rezone Site #26 is proposed for rezoning, site-specific project designs have not been prepared. Constraints such as stream systems and setbacks could limit full development of the 17-acre property.

Response to Comment 18-11
Please see Response to Comment 18-3.

Response to Comment 18-12
The proposed project is not CEQA exempt, and the Infill Sites exemption does not apply to the project.

Response to Comment 18-13
Please see Response to Comment 18-6.

Response to Comment 18-14
The proposed project does not include any site-specific development plans, designs or proposals and Rezone Site #26 is currently not served by transit. Any transit stops or bus turn-outs would be required as a condition of approval if an adopted Transit Master Plan calls for such a stop at the time of future project approval.

Response to Comment 18-15
The proposed project's potential impacts related to recreational facilities are discussed in Section XVI, Recreation, of the Initial Study. As discussed therein, a less-than-significant impact would occur.

Response to Comment 18-16

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 18-17

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 19

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: DEIR comments #2--Auburn passes resolution supporting local control...
Date: Tuesday, March 19, 2024 10:30:09 AM

From: Donna Delno <delnofamily@aol.com>
Sent: Saturday, March 16, 2024 11:34 PM
To: Jim Holmes <JHolmes@placer.ca.gov>; Patty Neifer <Pneifer@gmail.com>; Cheryl Berkema <cheryl.berkema@gmail.com>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Larissa Berry <lzkberry2@gmail.com>; Chuck-Muriel Davis <chamdavis@yahoo.com>; janice fera <janicefera@gmail.com>
Subject: DEIR comments #2--Auburn passes resolution supporting local control...

Dear Jim, Suzanne and copies to Kally, Larissa, Cheryl, Patty, Muriel and Janice;

19-1

Please see the article from GCM
And see the actions taken regarding the City of Auburn.
We expect our community plans to prevail and request RHNA numbers be reevaluated with current population- not outdated California census info.
Can you sign a resolution protecting penryn too?
I am actively involved in with several local long time community members- supporting our community plans and want accountability for local government.

Please keep penryn rural and follow our long time community plan to "preserve the rolling hills and granite boulders and peaceful meandering roads" .
Please and thanks-

Donna Delno
Founder- of Penryn Chit-chat
24 year Penryn advocate

https://goldcountrymedia.com/news/298650/auburn-passes-resolution-supporting-local-control-regarding-housing-issues/

LETTER 19: DONNA DELNO, PENRYN CHIT-CHAT

Response to Comment 19-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 20

PUBLIC INTEREST COALITION

March 18, 2024

Sent via email to CDRAECS&placer.ca.gov , kkedinge@placer.ca.gov , and others

To Placer County CDRA

Ladies and Gentlemen:

We support and defer to the vast majority of comments that oppose the burdens of locating affordable/low income (A/LI) housing in incompatible locations, and stress that any proposed locations should not be at the expense of rural residents who complied with County zoning with their (or their builders') Conditions of Approval (COA) when they originally built or bought their homes. No rural communities should now suddenly and unwillingly become "victims" of unacceptable, unnecessary "re-zoning" or previous agency malfeasance with little-to-no recourse.

With its obvious incompatibility issues (lack of services, traffic, etc.) as well as significant-but-unavoidable impacts, these Housing Element Sites Rezone proposals would never be approved during the many decades of normal, legal planning and permit processing that occurred. Because this current A/LI housing "crisies" has in part been created by Placer County and other agencies for NOT appropriately enforcing mandated codes as required by law, to mitigate the current problems, we respectfully submit that the following mitigation measures (MM) be fully adopted:

20-1

A. Placer County must place a moratorium on all permit issuances and/or building processes until the crisis or problems are resolved. The only exceptions may be to existing permitted projects that already have the required A/LI housing construction either completed or more than 80% completed.

B. Require that each of these COA or MM be fully met:

(1) The required state-mandated A/LI units shall be INCLUDED in any development's FIRST-phase construction plans and implanted as such;

(2) No "in lieu" fees "options" or alternatives shall be allowed unless a viable bond is provided to cover all required A/LI future construction costs that shall be continually funded to cover known or unknown inflation rates until all the A/LI units are finalized and legally signed off by the County.

(3) A strictly enforced time limit to meet construction of the required A/LI units shall be set with penalties for failure to comply that include: having all of the project's permits cancelled immediately, bonds forfeited, and a ban or suspension of the developer's (owner, contractor, applicant, and/or other designation) license(s) or right(s) to any future construction permit approvals for a period of not less than five years.

Thank you for considering our views,
/S/*Marilyn Jasper*
Marilyn Jasper, Chair

P.O. Box 671 Loomis, CA 95650 Public-Interest@live.com

LETTER 20: MARILYN JASPER, PUBLIC INTEREST COALITION

Response to Comment 20-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 21

TCS
PLANNING | DESIGN
PROJECT MANAGEMENT

March 18, 2024

Chris Pahule, Placer County Planning Director
Placer County
3091 County Center Drive
Auburn, CA 95603

Subject: **Housing Needs Rezone Program – Public Comment Letter**

Dear Mr. Pahule:

21-1 Our firm, TCS Planning, provides land use planning and entitlement support on a variety of large-scale and infill residential projects throughout Sacramento County. As a consulting company we represent an adjacent property owner. The property adjacent to the Whispering Creek subdivision at 8300 Cook Riolo Road (APN 023-240-077-000 & 023-240-038-000) has requested to be a candidate rezone property. This request changes the zoning designation to 20 – 30 units per acre which would allow and additional 80 to 120 units on the parcels. Consideration of such a project at this location is inappropriate on many levels which I will summarize below.

Property Specific Concerns

Traffic and Circulation

21-2 The DEIR Traffic component considers the two parcels referenced above individually and lacks specificity to the site. When a project moves forward, it is highly likely that it will consist of both parcels referenced above which differs from how the DEIR considers the zoned area. What type of project specific traffic analysis will be required when a project comes forward? There appears to be a significant gap in the analysis to rezone the sites when compared to what would normally be required for a rezone if it was part of a project application.

This proposed location as a rezone property is along Cook Riolo Road, a two lane, collector road with a speed limit of 35 miles per hour. As this newly proposed site will be targeted for low and very-low income households, these families and individuals will be reliant on walking and biking. Many areas along Cook Riolo Road are unimproved without sidewalks which can make it treacherous for pedestrian and bicycle traffic.

Allowing an additional 120 units would will add 180 vehicles along Cook Riolo Road, an already congested roadway system. Being across from Dry Creek Joint Elementary School, the traffic during morning and afternoon school hours is extremely problematic. Additionally, given the existing circulation pattern, the site would only have one point of connection for ingress/egress with Cook Riolo Road. This would not meet fire standards and would make the project unbuildable.

TCS
PLANNING | DESIGN
PROJECT MANAGEMENT

21-3

Neighborhood Compatibility
The proposed site is narrow at only about 315 feet wide and is encumbered by utility and access easements to the benefit of additional parcels that further narrows the parcels. In order to provide adequate parking for a development between 80 and 120 units, the building envelope would be significantly impacted, which would result in the construction of a building at least four stories tall. A four-story building is incompatible with the adjacent properties that are all single-story homes on large lots. While development has occurred in the surrounding area, the County has thus far done a good job of approving projects in keeping with the rural nature of the area.

21-4

Noise
The Dry Creek-West Placer Community Plan states "where noise levels have a potential to be in excess of normally acceptable CNEL levels, landscaped setbacks should be considered versus sound walls for noise mitigation"[1] Due to the constraints of the site and the proposed density, a sound wall would be required for mitigation with surrounding differing land-uses. A sound wall would diminish the character and rural aspect of the plan area.

21-5

Conclusion
The DEIR provides a superficial analysis of the impacts associated with buildout under the proposed zoning. Given the lack of specificity, it is inappropriate to rezone parcels and lose the discretionary power during a project approval in the future.

We appreciate the opportunity to provide comment and diligent and comprehensive efforts by Placer County staff to bring quality new housing at all income levels to the Placer Region. There are other sites within the County that have not been considered and may be more suited for the rezoning program.

We are available to discuss further with the County Staff at your convenience.

Respectfully,

TCS Planning

Laura Zuckerman

Laura Zuckerman
Associate Principal

[1] Dry Creek/West Placer Community Plan, Placer County Planning Department, 1994

LETTER 21: LAURA ZUCKERMAN, TCS PLANNING DESIGN PROJECT MANAGEMENT

Response to Comment 21-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 21-2
The proposed project does not include any site-specific development plans, designs or proposals, but the Draft EIR conservatively assumes future residential development on the rezone sites. As required by General Plan Policy 3.A.11, the County will require an analysis of the effects of traffic from all land development projects and each project must construct or fund improvements necessary to mitigate the effects of traffic from the project.

The comment also addresses pedestrian and biking facilities. Pedestrian and bicycle facilities surrounding each of the rezone sites is discussed in the CEQA Transportation Impact Analysis Final Report prepared by Fehr & Peers in January 2024 (Appendix I of the Draft EIR). The County does not agree that future low and very-low income households will be reliant on walking and biking.

Also noted is the possibility of one point of access to Cook Riolo Road. As there are not specific development plans for Rezone Sites #9 and #10, access has not been determined. The local fire district will determine whether the proposed access on any planned development is adequate.

Response to Comment 21-3
Please see Response to Comment 11-7.

Response to Comment 21-4
Community Design Element Goal 2, Policy 15 of the Dry Creek West Placer Community Plan requires wherever possible the use of setbacks and landscaping rather than sound walls in the Plan area. Because site-specific development plans, designs, or proposals have not been prepared for Rezone Sites #9 and #10, it is unknown what measures may be needed to reduce noise levels for future residents of the sites. The Policy recommends measures other than sound walls, but sound walls have been constructed throughout the Plan area in recent developments. The design of any such walls would be subject to County review as described in Response to Comment 11-7.

Response to Comment 21-5
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, the analysis in the Draft EIR has been prepared at a program level and is based on scientific and factual data that has been reviewed by the lead agency and reflects its independent judgment and conclusions.

Only projects with a minimum 20 percent affordable housing (as defined in Government Code Section 65915), could be permitted by-right as defined by Government Code Section 65583.2(i). Future development of the rezone sites would be subject to a Subsequent Conformity Review and Design Review Agreement process, the latter of which requires a public hearing as a discretionary process.

Letter 22

From: sofyan abbasi
To: Placer County Environmental Coordination Services
Date: Monday, March 18, 2024 4:23:25 PM

Hi,

22-1

I think this a great idea to further establish Roseville and placer county as inviting to all diverse populations regardless of income. For a very long time, Roseville, granite bay and placer county were regarded as a place for upper middle class or the elite. Approving this would definitely increase the local community's diversity. As housing prices keep going up, it's important to make sure there are places which are more affordable so all classes of people can live in a city to avoid any possibility of gentrification. I run a local restaurant in Roseville and most of my employees cannot afford to live in the Roseville area. They commute from other cities where they can afford housing, I would love to see more projects to make housing affordable so that they can live in the city where they work, so their kids go to a better school district in an area where their parents work. No one should be driving 30-40 minutes to commute to work just because they can't afford the housing market. There should always be options for everyone.

Sent from my iPhone

LETTER 22: SOFYAN ABBASI

Response to Comment 22-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 23

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Site 71 and 72
Date: Tuesday, March 12, 2024 8:42:36 AM

-----Original Message-----
From: Steve Abella <sabellasportsturf@hotmail.com>
Sent: Monday, March 11, 2024 10:36 PM
To: Board Clerk <BoardClerk@placer.ca.gov>
Cc: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Site 71 and 72

To whom it may concern
I am very concerned and have seen nothing in written form about the environmental impact on this steep canyon side site. I'm totally against the re zoning of site 71 and 72. For many additional reasons. This proposed 200 plus condos/ apts. will heavily impact traffic on this stretch of narrow, two lane road in rural Auburn. The sites entrance and egris off this narrow blind curve in the road, is not a feasible location for this high density of project. Two cars per household is potentially over 400 plus cars. Traffic will undoubtedly be increased up Lincoln Way. Due to limited freeway access near the site, vehicles will be forced to use the Foresthill intersection which will impact one of the most busiest freeway intersections in Placer County. There is very little foot traffic and no continuous sidewalks in this area, up Lincoln Way. It will be an extreme hazard for any Pedestrians.
Question, has anybody on the Board or planning commission actually walked this site? I invite you to do so and you will see that this location is one of the most ridiculous locations for this type of development.
Long time resident
Steve Abella
Hillcrest Dr.

Sent from my iPhone

23-1

LETTER 23: STEVE ABELLA

Response to Comment 23-1

Regarding slopes, the presence of a steep slope is not, in and of itself, an environmental impact. However, potential impacts related to slope are discussed in Section VII, Geology and Soils, of the Initial Study. As discussed therein, Mitigation Measure VII-2 requires projects to demonstrate conformance with the County Grading Ordinance, including slope heights and slope ratios.

Regarding traffic, please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. The proposed project does not include any site-specific development plans, so the feasibility of the site access cannot be fully evaluated. While the proposed sites are in the unincorporated County, the roadway itself is owned, operated, and maintained by the City of Auburn. If development is proposed on Rezone Sites #71 and/or #72, the proposed project would be reviewed in accordance with the City's roadway and encroachment standards. The project applicant would be required to provide engineering designs to meet these requirements, based on the size of the proposed project. The project applicant would be required to obtain an encroachment permit from the City of Auburn in order to construct an access point on Lincoln Way.

Regarding foot traffic, as shown in Figure 8-9 of the Draft EIR, there is a network of sidewalks on Lincoln Way near sites 71 and 72. The existing sidewalks are on the north/west side of Lincoln Way immediately opposite the frontage of sites 71 and 72. The sidewalks extend approximately 1,000 feet to the north and 0.5 mile to the south.

With respect to the question regarding if the Planning Commissioners or the Board of Supervisors have physically walked the site, please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 24

From: saeed ahmad
To: Placer County Environmental Coordination Services
Subject: DEIR 3865 Old Auburn rd
Date: Monday, March 18, 2024 1:44:33 PM

24-1

Dear Board of Supervisors,
I think it is a good idea to rezone the parcel to provide more housing in the community. It will bring more tax revenue for services and the local community. I urge you to approve rezoning for this land.

Thank you
Saeed Ahmed
916 343 4944
210 Broughton Ct
Granite Bay CA 95746

LETTER 24: SAEED AHMED

Response to Comment 24-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 25

From: scott alexander
To: Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Bonnie Gore; Kally Kedinger-Cecil; Frank Udvarhely; Placer County Environmental Coordination Services; Planning Commission; Board Clerk
Subject: 8989 Auburn Folsom Road Re-Zoning for a 4 Story Building
Date: Wednesday, March 13, 2024 1:54:45 PM

25-1

To all of you on this email string… First, let me express my appreciation for the hard work you have and are doing to comply with state and county laws and to obtain adequate funding for a variety of the counties needs. I imagine that in many ways this work can be thankless and interactions with a sometimes uninformed public is frustrating. With that said, my neighbors and I are very concerned about the potential for rezoning this property and building a 4 story housing structure. Currently the county is undergoing tremendous growth that is often times viewed by residents as excessive and with inadequate infrastructure in place. Most importantly to residents is to not alter the atmosphere and environment of our neighborhoods. Please look for alternative locations that have greater access to public transportation, greater access to good paying jobs, that have existing infrastructure in place and most importantly will not alter the feel of our neighborhoods. This later item is the one that causes most residents to get angry and frustrated with public officials.

25-2

My final comment is a question… Does the fire, police and sheriff departments feel that they currently have adequate infrastructure and staffing in place to safely accommodate such a re-zoning in this location? If not, where will the funding come from and how long will it take to hire and build for such a change.

Thank you for taking the time to review my concerns.

Sincerely,

Scott Alexander

LETTER 25: SCOTT ALEXANDER

Response to Comment 25-1

Please see Master Response 1 – Non-EIR/Administrative Issues. With respect to looking for alternative locations, as discussed in Chapter 3, Project Description, of the Draft EIR, the County's adopted Housing Element includes a Residential Land Inventory that identified 32 "candidate rezone sites." Following adoption of the Housing Element, the Residential Land Inventory list was evaluated and further refined to include a total of 74 sites as part of the EIR analysis. Some of the sites identified in the Residential Land Inventory have been developed or have active entitlement applications under review by the County and, thus, warrant removal. Other sites were eliminated based on potential environmental constraints, including likely Tribal Cultural Resources, and development feasibility. Sites have also been added by staff or included by request of a property owner. The list has been expanded to include additional sites so as to ensure that the properties ultimately rezoned incorporate a "buffer" to avoid rezoning later in the planning cycle to ensure "no net loss" of suitable residential sites. Through the planning and EIR process for the Housing Element Sites Rezone Project, the sites were further refined to include 72 sites. On February 13, 2024, the County Board of Supervisors directed staff to continue consideration of only 19 sites for inclusion of the rezone program. As such, the County has spent considerable time and effort in evaluating alternative locations for rezone sites.

Response to Comment 25-2

The commenter expresses concerns regarding adequate fire and police protection services to accommodate future residential development of Rezone Site #26. As discussed under Item XV-2 in the Initial Study prepared for the proposed project, increased property taxes associated with future residential development on rezone sites would contribute to County Public Safety funding, which can be used to offset increased demands placed on the Placer County Sheriff's Office (PCSO) as a result of increased population. In addition, as discussed in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, Rezone Site #26 is located within the jurisdiction of the South Placer FPD. Rezone Site #26 is located less than 500 feet from the South Placer FPD headquarters, located at 6900 Eureka Road, Granite Bay. In addition, as discussed under Impact 10-1, as part of preparing the Draft EIR, South Placer FPD personnel were consulted and confirmed that given payment of the applicable Fire Facilities Fees, the future residential development within Rezone Site #26 would be adequately served by the relevant fire protection district.

Letter 26

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezone Memorandum ERRORS - Please advise and correct ASAP
Date: Tuesday, February 20, 2024 9:15:13 AM

-----Original Message-----
From: Taylor Beshore <taylorbeshore@gmail.com>
Sent: Thursday, February 8, 2024 9:22 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Rezone Memorandum ERRORS - Please advise and correct ASAP

Hello,

26-1

In reviewing your Memorandum for the upcoming Feb 13th meeting, I am finding many mathematical errors that do not add up. Can you please clarify how your list below (taken from your Memorandum on Page 4/footnote 182) adds up to 112 units? Based on your enclosed list, I am getting 188 units (148 LI + 40 VLI).

• Martis Valley West: 47 Low-Income units • Shaffer's Mill: 35 Very Low-Income units, 20 Low-Income units (total of 55 units) • Hopkins: 5 Very Low-Income units, 13 Low-Income units (total of 18 units) • Dollar Creek Crossing: 30 Low-Income units • Sabre City: 38 low-income units • Total Units: 112 (40 Very-Low Income units and 72 Low-Income units)

Because this entire Rezoning debacle is based off of how many units are still needed, it should be of upmost importance to be using accurate numbers in your reports that you are presenting to the public and to the Board of Supervisors. Tens of thousands of people are being misled by this.

Please advise, and correct this memorandum as soon as possible.

Thank you,
Taylor Alexander

LETTER 26: TAYLOR ALEXANDER

Response to Comment 26-1

Please see Master Response 1 – Non-EIR/Administrative Issues. An error in the February 13 Board of Supervisors Staff Report Memo was identified on Page 4. The Placer County Housing Element also identified a shortfall of 1,107 lower income units. Since approval and certification of the Housing Element in 2021, several sites identified in the Residential Land Inventory as being *Approved or Planned* have either been developed or are the subject of litigation, which result in larger shortfall. These include the following projects:

- Martis Valley West: 47 Low-Income units
- Shaffer's Mill: 35 Very Low-Income units, 20 Low-Income units (total of 55 units)
- Hopkins: 5 Very Low-Income units, 13 Low-Income units (total of 18 units)
- Dollar Creek Crossing: 30 Low-Income units
- Sabre City: 38 low-income units
- Total Units: 112 (40 Very-Low Income units and 72 Low-Income units)

As a result of the above adjustments, the shortfall has been increased by 112 units for a new shortfall of 1,219.

Letter 27

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30
Date: Tuesday, March 19, 2024 10:58:59 AM
Attachments: Outlook-a3x34r35.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:14 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: John Anderson <johnganderson@hotmail.com>
Sent: Monday, March 18, 2024 3:21 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>
Cc: Debbie Anderson <debbiesanderson@hotmail.com>
Subject: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

27-1

Dear Board of Supervisors and Members of the Planning Department,

I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per

acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:

Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

27-1 cont.

Many of the properties are self contained with septic systems and wells that the property owners have invested in order to live in this community. What happens to those systems when the high density apartments are built next door. I have heard of wells being contaminated and septic systems damage due to runoff changes. Several of the proposed sites are in flood plains and drainage diversion could have a unforeseen environmental impacts.

Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

This is evident by the necessity to have speed bumps on Cook Riolo Road. This is the main north-south throughfare though the eastern portion of the community. Think of it as Woodcreek Oaks, would you consider putting speed bumps on Wood Creek Oaks, No, it was designed as a main traffic artery with no homes facing the street. There are many homes, including those that are licensed day care facilities that front Cook Riolo. Even Walegera Avenue has been designed as a main artery. Watt avenue is still undeveloped and could be planned appropriately. But Cook Riolo and East Avenue are long time county roads with no ability to do preplanning, just add some speed bumps to slow the traffic down and that will solve the problem.

27-2

Furthemore, the traffice impact will be felt by the City of Roseville and the community of Antelope in Sacramento County. There are no direct routes to the freeway as PFE deadends into the railroad tracks. Is the county prepared to carry the burden of building a overpass or tunnel to connect PFE with Cirby way. If not all roads lead to one of 2 major roadways, Walegra or Baseline. Yes, there are other roads but these are country roads with no sidewalks and homes that enter and exit directly onto the roadway. Shall we just add more speedbumps and that will solve the issue.

Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

As indicated in the DEIR there is only one Fire Station in our community. In many of the newer planned communities the roads are Private roads meaning that there are no patrols by the Sheriff or Highway Patrol, only when a call is made for assistance.

In the workshop "Welcome to Placer County's Community Conversations onHousing! Session 1: Demystifying Multifamily Housing" held on June 1, 2023

The following slide listed the "BENEFITS OF MULTIFAMILY HOUSING"
• More compact development saves land & resources - why develop compact housing in a area that has ample space and still provides the country life style
• Gentle density in the right places can create more walkable, bikeable, and transit-oriented places AND reduce car dependency (i.e., how much we have to drive for our daily needs) - there are no stores to walk to and no public transit to get you there. This will only increase gas emissions.
• Can provide greater sense of community by creating shared spaces and walkable neighborhoods - The negative responses that you have received are a indication of how the new high density housing will be received by the existing community

27-3

We understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

We respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning.

Furthermore, in the future hold the new planned developments responsible for 10% of high density (lower income) rather than let them "buy out" of the responsibility to provide for this need. it is better to plan for this need in new developments rather than change the life style of long time communities.

Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely,

John G Anderson
Debbie S Anderson
Janae A Anderson
Joshua j Anderson

John G Anderson

LETTER 27: JOHN ANDERSON

Response to Comment 27-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. It is specifically noted that existing residential septic systems and groundwater wells within the Dry Creek area would not be adversely impacted by any future residential development on rezone sites given that said development would be required to connect to the public sewer and water systems, and stormwater runoff from new development would be routed to the County's storm drain system and not onto adjacent properties where it could infiltrate into septic leach fields or underlying groundwater.

The potential for development within the floodplain is addressed in Discussion Item X-5 of the Initial Study, which is attached to the Draft EIR as Appendix A. As discussed on page 52 of the Initial Study, seven rezone sites (Sites #3, #4, #5, #6, #7, #23, and #26) are located, or partially located, within Flood Hazard Zone AE. Flood Hazard Zone AE is defined as being areas subject to inundation by the one percent annual chance flood event, and the Federal Emergency Management Agency (FEMA) provides base flood elevations for such areas. In addition, one rezone site (Site #32) is located within Flood Hazard Zone A, which is defined as being areas subject to inundation by the one percent annual chance flood event, and without a FEMA-provided base flood elevation. Future development of the rezone sites would be required to comply with several General Plan policies related to flood hazards, such as Policy 8.B.1.3, which requires future development applications to evaluate the potential of flood hazards; Policy 8.B.1.4, which restricts new construction from being permitted within 100 feet of the centerline of permanent streams and within 50 feet of intermittent streams, or within the 100-year floodplain; and Policy 8.B.1.5, which requires that the County maintain natural conditions within the 100-year floodplain, while allowing limited crossings and improvements for public roads, trails, and utilities.

In addition, all future improvements would be subject to Article 15.52, Flood Damage Prevention Regulations, of the Placer County Code, which is intended to minimize public and private losses due to flood conditions, including where public facilities and utilities are located within areas of special flood hazard. The Flood Damage Prevention Regulations provide methods for reducing flood losses and set forth standards for construction in all areas of special flood hazards. As noted within the Flood Damage Prevention Ordinance, new development (including all site grading) is required to be outside of the 100-year floodplain, unless another option is not available.

Considering the above, the proposed project is not anticipated to result in the impediment or redirection of flood flows such that on- or off-site structures would be exposed to flood risk. However, if avoidance of the 100-year floodplain is not feasible, a Conditional Letter of Map Revision (CLOMR) would be required prior to Improvement Plan approval for the sites located within Flood Hazard Zones in order to ensure the project's compliance with existing regulations. Therefore, the Initial Study includes mitigation measures (X-7 through X-10) to ensure that any residential development within the floodplain would not adversely affect upstream or downstream properties.

Response to Comment 27-2

Please see Master Response 4 – Traffic Safety.

Response to Comment 27-3

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 6 – Impacts to Local Schools. In addition, as discussed under Impact 10-1 in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, Placer County Fire Department personnel confirmed in correspondence with the County that the existing fire stations that would serve and are located proximate to the rezone sites would be adequate to serve the proposed rezone sites. Rezone sites in Dry Creek would be served by Dry Creek Station 100, located at 8350 Cook Riolo Road. Furthermore, a new fire station is planned to be developed as part of the Placer Vineyards Specific Plan.

Letter 28

From: Kelly Anderson
To: Placer County Environmental Coordination Services
Subject: I need a home
Date: Monday, March 18, 2024 10:29:53 AM

28-1 I am hopeful to get a place in one of these housing develpments
Sent from Kelly Anderson

LETTER 28: KELLY ANDERSON

Response to Comment 28-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 29

From: Lois Anderson
To: Pauline Sakai; Board Clerk; Kally Kedinger-Cecil; Supervisor Gore; Placer County Environmental Coordination Services
Subject: Re: FW: HOUSING NEEDS REZONE PROGRAM
Date: Tuesday, February 13, 2024 1:53:18 PM

29-1

To Whom it may concern in Placer County Government:
We too are unhappy constituents in Placer County. This rezone was just posted on the property at the corner of East and Foothills Blvd. on Saturday, the 10th of February, leaving little time to voice our concerns.
We agree with everything mentioned in the attached letter from Pauline Sakai, a neighbor and friend. We have lived in this area for 38 years. Proper notification was not given about this rezoning plan. As I'm sure you know, this property and surrounding areas are zoned for 1 and 2 acre lots. Was there any thought given to other areas in Placer County or was this just the first property to be found that could be rezoned; as it appears you were rushing to meet a deadline.
There are acres and acres further west on Baseline Road. Was that area considered for rezoning also?
The entire Dry Creek Community is concerned about this proposed zoning change.
Another unhappy constituent,
Lois Anderson

On Tue, Feb 13, 2024 at 9:40 AM Pauline Sakai <sakaip@surewest.net> wrote:

Hello All,

Thank you Laura for sharing your letter to the County. I also wrote my own letter, stealing bits from Laura's. See attached.

Below is a response to my letter from Bonnie Gore. Sorry, I won't be able to attend meeting today but would appreciate follow-ups regarding this topic.

Pauline Sakai

From: Supervisor Gore <SupervisorGore@placer.ca.gov>
Sent: Tuesday, February 13, 2024 7:15 AM
To: Pauline Sakai <sakaip@surewest.net>
Subject: RE: HOUSING NEEDS REZONE PROGRAM

Good morning Pauline,

Thank you so much for your comments concerning the Residential Land Inventory Rezone Program. This is a challenging issue, and we are working to address this while reducing the impact to current residents as much as possible.

I appreciate you taking the time to write. Please do not hesitate to reach out again if you have any other questions or concerns.

Sincerely,

Bonnie

~Supervisor Bonnie Gore

Placer County, District 1

From: Pauline Sakai <sakaip@surewest.net>
Sent: Monday, February 12, 2024 10:32 PM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Supervisor Gore <SupervisorGore@placer.ca.gov>; Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>
Subject: HOUSING NEEDS REZONE PROGRAM

To Whom It May Concern in Placer County Government:

See the attached letter regarding my concerns over the plans to rezone parcels along East Drive in West Roseville.

Unhappy constituent,

Pauline Sakai

LETTER 29: LOIS ANDERSON

Response to Comment 29-1

Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 25-1. Furthermore, it is noted that the County complied with all CEQA requirements related to proper EIR noticing.

Letter 30

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: MAJOR Issue in Granite Bay community - HE-1 Site 26
Date: Wednesday, March 13, 2024 11:37:05 AM

From: Cristen Andrews <c10andrews@gmail.com>
Sent: Wednesday, March 13, 2024 10:04 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: MAJOR Issue in Granite Bay community - HE-1 Site 26

Dear Kally,

I'm writing to you today about the proposed Housing Element Program (HE-1), and more specifically the Draft EIR, which lists Site #26 in Granite Bay as a top choice to place hundreds of 'low income' & 'very low income' multi-family housing. https://www.placer.ca.gov/DocumentCenter/View/77692/Housing-Element-Appendix-F?bidId=). This site is 17 acres on the corner of Fuller Drive and Auburn Folsom Road (8989 Auburn Folsom Road). Respectfully, for the safety of ALL current and future citizens in Granite Bay and Placer County, this site needs to be REMOVED from the candidate list immediately.

As a citizen of Granite Bay living directly across the street from this proposal, as well as someone who has children in the local school system, I'd like to share grave concerns about this proposal, and why the entire community of Granite Bay does not think this is in the best interest of anyone in Placer County:

30-1

#1 SAFETY
a) Placing 'very low income' housing bordering a SCHOOL is incredibly reckless and will absolutely lead to an increase in crime. It appears there is no consideration for the safety and well-being of the children who attend Cavitt Middle School.
b) An increase in crime and deterioration of Cavitt will undoubtedly lead to a downgrade in the school's ranking as well.
c) Auburn-Folsom Rd functions like a highway, with cars easily going 60-70mph on a regular basis. Where are the kids who would live in this proposed development going to play? The answer is on and around Auburn-Folsom, and you will sadly see an increase in fatalities along the corridor, many of whom likely will be children. This again is beyond reckless.

30-2

#2 LACK OF INFRASTRUCTURE
a) Auburn-Folsom Rd is not equipped to handle the additional presence of hundreds of cars a day at the intersection with Fuller Drive. What is already jammed every single morning will turn into utter chaos, which will then require additional law enforcement resources that the county simply does not possess.
b) We do not have the proper resources to handle adding hundreds of residents at Site #26. There's no close access to hospitals & other essential needs, & adding

'very low income' housing into an area already stretched thin is not setting up anyone for success, but rather is penalizing everyone. It doesn't support the citizens of Granite Bay.

30-2 cont.

c) There is no Public Transportation locally available to accommodate this. How are 'very low income' residents expected to commute/find reliable transportation, and to what jobs are they commuting to? The local area does not have a surplus of jobs.

#3 ENVIRONMENTALLY IRRESPONSIBLE & POTENTIALLY UNLAWFUL

a) Multiple protected species, including the Golden Eagle, utilize this parcel of land. We are also of the belief that the proper environmental studies were not conducted. CDFW has been informed of this.

30-3

b) Linda Creek (which would be severely impacted by this project) is home to protected salmon that swim upstream to spawn.

c) The state's VERY OWN CRITERIA specifically notes that the housing program is not intended for larger sites in excess of 10 acres. This isn't even close even with adding in a buffer zone around the creek.

Kally, I respectfully ask that you move to join Supervisor Jones and eliminate Site #26 from the list of candidate sites. Please do the right thing by the very people you were elected to serve. We will pursue this from every angle possible, including legal action if required, to ensure that OUR community is safe.

Thank you for your time and consideration.

Sincerely,

Cristen Andrews Spicer
c10andrews@gmail.com
cell: 925.997.7074

LETTER 30: CRISTEN ANDREWS

Response to Comment 30-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety.

Response to Comment 30-2

Please see Master Response 4 – Traffic Safety. In addition, the Kaiser Medical Center is a hospital that is 5.6 miles west of the site. Other social amenities within a mile of the site include: public sewer, public water, bus stations (4.1 miles to the west near the intersections of Douglas Boulevard and Sierra College Boulevard and Eureka Road and Sierra College Boulevard), schools, grocery stores, and parks.

Response to Comment 30-3

According to Madrone Ecological Consulting (Madrone), the professional consultants who prepared the Biological Resources Assessment used in the Draft EIR analysis, evidence is not available to support the assertion that golden eagle utilize Rezone Site #26. A search of both the eBird database and iNaturalist reveal only three records of golden eagle in the vicinity of the site (all on eBird), none of which are on-site, and none of which indicate any use of the location; all such records may be birds soaring past. Furthermore, the only golden eagle nest in the greater vicinity on iNaturalist is a nest in the vicinity of El Dorado Hills that is located in an expansive grassland, which is suitable habitat for golden eagle. According to Madrone, Rezone Site #26 lacks such suitable habitat for the species, and, thus, the potential for golden eagle to use the site for foraging or nesting was determined to be extremely low, and the species was not discussed further in the Biological Resources Assessment. Nonetheless, Mitigation Measure 5-1(a) of the Draft EIR requires a field survey to be conducted for any rezone site prior to approval of any permit authorizing construction, which would include a site-specific evaluation for special-status species, including golden eagle. Should special-status species be encountered on-site, appropriate actions would be taken.

Please see Master Response 1 – Non-EIR/Administrative Issues. However, the following response is provided to clarify the state's guidelines for "large sites," which the State defines as a parcel greater than 10 acres in size:

The Site Inventory Guidebook (Guidebook) from the California HCD, page 17 states: "Parcels larger than 10 acres are considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on such sites was successful during the prior planning period, or there is other evidence that the site is realistic and feasible for lower income housing." The adopted Housing Element initially assumed that an overlay zoning designation would be established, primarily for commercial-zoned sites. Prior to the *Clovis v. City of Martinez* court case, the guidance from HCD was to assume a "realistic density" calculation that would have resulted in a lower unit assumption for commercial-zoned sites, as is the case with Rezone Site #26. Following the court case, the County has initiated a program that would rezone sites instead of imposing an optional overlay. Accordingly, the unit assumptions in the Housing Element are no longer applicable. In February 2024, the County amended the Housing Element to acknowledge this change, and to include a discussion of affordable housing projects on large sites in Roseville.

In addition, the Guidebook notes that for large sites, “evidence” that a large site can accommodate lower income housing is required if a jurisdiction includes a large site in their site inventory. The Guidebook states that “evidence may include developer interest, proposed specific-plan development, potential for subdivision, the jurisdiction’s track record in facilitating lot splits, or other information that can demonstrate to HCD the feasibility of a site for development” (Site Inventory Guidebook page 17). In the instance of Rezone Site #26, the property owner is interested in rezoning the site and has successfully developed other projects in the County including Granite Bay. Furthermore, netting out the 100-foot stream system setback from Linda Creek, a 50-foot riparian vegetation buffer, and setbacks from the adjacent roadways, the overall area available for development is approximately 12.3 acres.

Letter 31

From: Carol Apple
To: Placer County Environmental Coordination Services
Subject: development of property next to Cavitt Jr High.
Date: Thursday, March 7, 2024 9:31:07 AM

31-1
31-2
31-3
31-4

This area has been a habitat for alot of foxes, skunks, deer and other little wild life. The area also has alot of traffic now, due to Auburn Folsom Road, and when school is open and finishing for the day. Also, my concern is how is this going to affect the classes at the schools? More children, overcrowding, and the rising property tax bills. This is wrong on so many levels. I AM AGAINST this!!!

Carol Apple
7363 Bainbridge Ct, Granite Bsy, Ca. 95746

LETTER 31: CAROL APPLE

Response to Comment 31-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 31-2
Please see Master Response 4 – Traffic Safety.

Response to Comment 31-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 6 – Impacts to Local Schools.

Response to Comment 31-4
Please see Master Response 2 – Social and Economic Impacts and Master Response 6 – Impacts to Local Schools.

Letter 32

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: SITE 74 SHOULD BE REMOVED
Date: Tuesday, February 20, 2024 9:16:30 AM

From: Dennis Arietta <djarietta292@hotmail.com>
Sent: Saturday, February 10, 2024 12:50 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: SITE 74 SHOULD BE REMOVED

32-1 I'm sending you this email to voice my opposition to the rezoning of property map site 74, parcel number 052-171-005-000. I am both a tax professional and realtor As a realtor, the rezoning of this parcel to "very low income" housing would negatively impact the value of not only my home but all homes in Princeton Club Estates. This proposal which includes 316 units is located withing ¼ mile of our subdivision entrance.

32-2 Currently, Bell Road is an "Expressway" and is impacted with traffic traveling from Highway 49 and Highway 80. I would conclude that the only way to not further impact Bell Road, would be to create easements across property lines to Bill Francis Drive which will further negatively impact our subdivision since Bill Francis Drive is our only ingress and egress to our homes.

I respectfully submit my opposition to this rezoning.

Dennis Arietta
1527 Radcliffe Way

LETTER 32: DENNIS ARIETTA

Response to Comment 32-1

Please see Master Response 2 – Social and Economic Impacts. In addition, it is noted that pursuant to direction provided at the February 13, 2024 Placer County Board of Supervisors meeting, Rezone Site #74 has been removed from the list of rezone sites being considered by the County as part of the project.

Response to Comment 32-2

Please see Master Response 4 – Traffic Safety.

Letter 33

From: Anita Arietta
To: Kally Kedinger-Cecil; Placer County Environmental Coordination Services
Subject: SITE 74 MUST BE REMOVED!
Date: Thursday, February 8, 2024 12:43:34 PM

33-1 I have lived in Auburn since 1977 and have been a homeowner in Princeton Club since 2000. Recently I became aware that at a Placer Rezoning "town hall" meeting on August 8, 2023, a sixteen acre site (Site 74) was not even discussed. When the question was asked if the designation of "very low income" included the "Homeless" the answer was "Yes!". Site 74 will include 316 units, more than tripling the 90 homes in Princeton Club. 'Very low income' people will be living just 1/4 mile from our entrance. I am concerned of the impact to nearby services and schools due to the influx of individuals and vehicles a high density development would bring.

33-2 Let's think about the low income people. There is no support structure for them at Site 74. How will they shop for food? If they have no car, will they be safe walking along Bell Road to Safeway, along New Airport Road to Bel Air? I don't think so. What about schools for their children? The closest elementary school is Auburn Elementary which is 2-3 miles from the site. Site 74 is quite isolated from services. yo

LETTER 33: ANITA ARIETTA

Response to Comment 33-1

Please see Master Response 2 – Social and Economic Impacts and Master Response 6 – Impacts to Local Schools. In addition, it is noted that pursuant to direction provided at the February 13, 2024 Placer County Board of Supervisors meeting, Rezone Site #74 has been removed from the list of rezone sites being considered by the County as part of the project.

Response to Comment 33-2

The concerns expressed by the commenter are not environmental impacts that require analysis under CEQA. Nonetheless, as discussed under Impact 8-2 in Chapter 8, Transportation, of the Draft EIR, the County would require future applicants seeking to develop the rezone sites to construct frontage improvements to the rezone sites, which would include the development of any planned bicycle and/or pedestrian facility improvements. Further, any alterations to existing bicycle, pedestrian, or transit facilities proposed at the time individual rezone sites are developed would be required to comply with all applicable Placer County and community plan policies and design standards. In addition, please see Master Response 2 – Social and Economic Impacts and Master Response 4 – Traffic Safety. The comment has been forwarded to the decision-makers.

Letter 34

February 9, 2024

Subject: Housing Element Sites Rezone Project/Request to Preserve the Natural Environment near Our Residence

Dear Board of Supervisors/Placer County Community Development Resource Agency,

We're writing to express our deep concerns regarding the proposed construction of low-income housing in the forest area near our residence in Auburn, on Taylor Lane. The proposed site is 12.8 acres, No. 34 on your property map (APN: 038-104-095-000).

34-1 First and foremost, we would like to emphasize that our intention is not to oppose the provision of affordable housing for those in need. We understand the significance of such initiatives and the positive impact they can have on society. However, we firmly believe that it is equally important to strike a balance between meeting housing needs and preserving our natural surroundings.

34-2 As long-term residents of this neighborhood for the past 40+ years, we have witnessed the beauty and serenity of this natural environment, and strongly believe in the importance of preserving it. The forest near our home has been a sanctuary for countless wildlife, a source of fresh air, and a place of solace in terms of noise for nearby residents. Just like so many others we moved to the Auburn area (and this street) to provide a safe and quiet environment to live and raise our children in. One of the main reasons we have stayed is the nearby forest area and our homes placement near the end of the quiet cul-de-sac. The proposed site (No. 34) runs directly against our residents' homes and along our cul-de-sac.

34-3 The forest's lush greenery, diverse flora and fauna, and tranquil atmosphere contribute to the overall well-being of our community and the residents of our quiet street. The construction of low-income housing in this area would not only disrupt the delicate ecosystem but also diminish the unique charm and character of our neighborhood. Many residents choose to live in North Auburn due to its rural surroundings, and every year we're seeing our only remaining natural spaces shrinking by over-development. The noise and light pollution from developments on nearby Hwy 49 have been getting worse in recent years, as well as increased traffic congestion. It is critically important that any development that would add traffic to 49, which this certainly would, must cautiously be evaluated. The addition of a housing development of this scope will significantly and permanently increase the overall residential noise and pollution in the area, and it will bring years' worth of construction noise and environmental degradation as well.

34-4 We kindly request that you consider alternative locations for the proposed low-income housing project, focusing on areas that would not require razing the cherished forest near our residence, and displace so many living creatures. There may be other suitable areas within the county that can accommodate the housing needs without compromising the natural environment that we hold dear.

34-5

We understand that decisions regarding land use and development are complex and require careful consideration. However, we believe that by working together, we can find a solution that respects the needs of the community while preserving the natural beauty that has been cherished for decades. If the county declines the wishes of residents and plans to move forward with site No. 34, we can only ask that under *no circumstances* you consider punching through the end of our cul-de-sac here on Taylor Lane, and that you keep a wide buffer of nature between our residents' homes and the proposed development.

Thank you for your attention to this matter. We trust that you will take our concerns into account and make a decision that upholds the best interests of both the residents and the environment.

Yours sincerely,

Lottie Aston & Jason Long
1230 Taylor Lane
Auburn, CA 95603
lottieaston@outlook.com

On behalf of some residents who don't have means to attend in person, or the ability to submit comment by the deadline this afternoon, they have asked that their names be added to this letter to be included on record for public comment.

Sandra Herrill
1240 Taylor Lane
Auburn, CA 95603
530-762-8133

Karyn Bradley
1250 Taylor Lane
Auburn, CA 95603
revbradleyk@hotmail.com

Deborah & Edward Riley
1260 Taylor Lane
Auburn, CA 95603
riley102000@yahoo.com

LETTER 34: LOTTIE ASTON AND JASON LONG

Response to Comment 34-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 34-2
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 34-3
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, impacts related to protected biological resources are addressed in Chapter 5 of the Draft EIR.

Response to Comment 34-4
Please see Response to Comment 25-1.

Response to Comment 34-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. The concern about "punching" through the end of the cul-de-sac on Taylor Lane is noted for the record and would be considered should the site be rezoned and an application be submitted at a later date for residential development. The proposed project does not include any site-specific development plans, designs, or proposals at this time. As such, the project's potential to substantially increase hazards to vehicle safety due to a geometric design feature cannot be specifically evaluated at this time. However, all new developments that occur within the County would be required to comply with all applicable design standards as part of constructing or modifying the transportation system. For example, Policy 3.A.2 of the Placer County General Plan requires all streets and roads to be constructed in accordance with General Plan, community plan, and specific plan standards.

Letter 35

From: Jane Bailey
To: Placer County Environmental Coordination Services
Subject: Environmental Impact Report for Project 26, 8989 Auburn Folsom Rd
Date: Friday, March 8, 2024 5:14:54 PM

To whom it may concern:

35-1 Respectfully requesting that a proper and legal EIR must be conducted on this property prior to any and all construction.

Thank you.
Jane Bailey
12140 Mont Vista
Auburn, 95603
Sent from my iPad

LETTER 35: JANE BAILEY

Response to Comment 35-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 36

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: OPPOSE THIS!!
Date: Tuesday, February 20, 2024 9:08:46 AM

From: Judie Barlupi <jbarlupi@att.net>
Sent: Sunday, February 4, 2024 1:44 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: OPPOSE THIS!!

36-1 I am writing to go on record that I STRONGLY OPPOSE the housing development proposal on Bell Road & New Airport Road
We do NOT want this in our community!
Too many reasons to state all of the negative impact this would have on our beautiful area.

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

LETTER 36: JUDIE BARLUPI

Response to Comment 36-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 37

From: Rhiannon Beck
To: Kally Kedinger-Cecil; Suzanne Jones; Frank Udvarhelyi; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Subject: Housing Element Amendment 2024 and Housing Element Appendix F Adoption
Date: Thursday, March 7, 2024 4:54:54 PM
Attachments: 030624 Letter by Jaclyn Freeman.pdf

March 7, 2024

Placer County Board of Supervisors
Attn: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

Dear Placer County Board of Supervisors:

My name is Rhiannon Beck. I am a Placer County resident with an address at 1359 Sun Tree Drive, Roseville, CA 95661. I was born in Placer County, and with my husband, are raising our children here.

37-1 With regard to the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

37-2 I am writing in support of the letter written by Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024 (attached). I respectfully request the Board consider the concerns expressed therein (but not limited to) an extension of my own opinion.

In addition to the aforementioned concerns, I am baffled, and frankly, OUTRAGED at the point made (read: buried) on page F-43 of said Housing Element Amendment Appendix F:

37-3 "Two of the census tracts where rezone capacity was identified we considered Racially Concentrated Areas of Affluence (RCAAs) as part of the HCD's analysis using data from the 2015-2019 ACS (206.01 and 206.07). Both are located in the Granite Bay area. By identifying sites in this area to rezone for higher density residential uses, the County can facilitate the development of housing affordable lower-income households in this area and mitigate the current concentration of affluence."

Let me say it again for the people in the back: ***RACIALLY*** Concentrated Areas of Affluence. ***MITIGATE*** the current concentration of ***AFFLUENCE***. This is abhorrent, racist in the literal use of the word, and should NOT be tolerated. I would imagine this would offend even the minority of races.

37-4 On a separate note, I would like to bring to the attention of everyone that the County has been accepting money from developers (they say fees, I read BRIBE) since at least 2021, so that the developer/owner does not have to set aside any units for low income. The County (or whomever received these monies) must show an accounting of where those funds have gone, as by all rights, those monies should have been set aside for this project to mitigate the cost, rather than pass the entire bill on to the taxpayers.

37-5 I will end my statement with a simple request of the Board of Supervisors: Please take all of our public comments to heart. This is your community too, let's work together to make it the best we can, for as many as we can, and keep it the beautiful community it has always been.

Thank you,

Rhiannon Beck
Placer County Resident

LETTER 37: RHIANNON BECK

Response to Comment 37-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 37-2
Please see Responses to Comment Letter 162.

Response to Comment 37-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 37-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 37-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 38

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: High-Density Project 8989 Auburn-Folsom Road
Date: Tuesday, February 20, 2024 9:19:14 AM

From: Rhiannon Beck <rmtwn2@gmail.com>
Sent: Monday, February 12, 2024 4:44 PM
To: Suzanne Jones <SuzanneJones@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: High-Density Project 8989 Auburn-Folsom Road

38-1 I am writing in protest of the re-zoning of the commercial property to residential for the purpose of high-density, low and very low income housing. The property in question is located at the corner of Auburn-Folsom Road/Fuller Drive in Granite Bay, Unincorporated Placer County.

While I understand that there is a need for this housing, this parcel is not appropriate for this project. The following issues MUST be considered:

1) Lack of services:

38-2 a) Public Transportation: This area of Placer County does not have a public transportation system. Most very low income families do not own a vehicle or only have one between two adults.

b) Grocery Services: The nearest non-premium market is 3.8 miles away (Walmart Neighborhood Market). Raley's is a premium grocery market and is not affordable for citizens on a low-budget income.

c) Medical Care: The nearest non-private medical facility is Kaiser Roseville at 4.8 miles away.

38-3 d) Impact On Property Values: The area of Placer County that this parcel is located is surrounded by established single-family homes. A project of this size, style, and volume does not fit the landscape of the area. This would be the equivalent of putting a Walmart in the middle of Shelborne, or a 7-Eleven in Wexford. This area of Granite Bay was developed with the quiet of rural, but the convenience of suburb. High-density apartment units are not a distinguishing desire for current or future residents of this particular space next to our beautiful Folsom Lake.

38-4 e) Population Impact: Five hundred and ten (510) units, with the potential of fifteen hundred (1,500) additional people in this space is unfathomable. Fuller Drive is a two lane residential street with Cavitt Junior High located just East of the parcel. Traffic on the streets surrounding the school is already impacted during the school year with students and parents; and outside the school year and operating hours, the parking lot and Fuller are crowded with residents using the trail system along the property to access the lake. Introducing this many more residents that largely may not have transportation elsewhere will add to the degradation of the trail system and resources.

38-5 I respectfully, but decisively urge the Board to find another location for this project that has the services available for the potential new residents. This parcel is zoned commercial and should remain either open-space, a picnic area, or used as something that would complement the landscape and keep the area as non-impact on our natural resources.

Sincerely,

Rhiannon Beck
Placer County Resident
(530)409-1831

LETTER 38: RHIANNON BECK

Response to Comment 38-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 38-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 38-3
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 38-4
With the exception of traffic congestion, which is not a CEQA issue (See Master Response 1), impacts of the proposed project related to transportation are addressed in Chapter 8, Transportation, of the Draft EIR. As discussed under Impact 8-2, the potential future residential development of the proposed rezone sites would not interfere with any existing or planned multi-modal facilities. In addition, please see Master Response 4 – Traffic Safety.

Response to Comment 38-5
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 25-1.

Letter 39

Rezoning DEIR Comments 2/21/2024 – Amber Beckler

1. **Scoping Changing during DEIR Process.** How can I provide full comments on the DEIR when the scoping of the project is changing in parallel and the final table or inventory of potential rezone sites is not in the DEIR based on direction provided by the Board on 2/14/24? I understand the DEIR contains a list of parcels that is bigger than the Board direction was given on 2/14/24 at the Rezoning workshop but as an example county owned parcels are not included in the DEIR analysis and only show up as an alternative. How is the procedure even valid following CEQA law when the Board is being asked for direction on the scope of the project AFTER the Draft EIR is already published and circulated for review? Isn't the scope of the project supposed to be validated and locked down during the NOP phase? How can the public effectively provide comments on a moving target of scope for a DEIR?

39-1

2. **County-owned properties and existing Specific Plans not included in DEIR analysis.** During the 2/14/24 Rezoning Board Workshop, the Board asked that the two county-owned properties be evaluated for inclusion. In addition, it was raised that existing property owners with Specific Plans in the Sunset Area could be contacted to increase density to accommodate more of the burden and where a new planned community including taxpayer funded infrastructure is being developed. Staff said that those weren't part of the DEIR so would not be analyzed. The county-owned properties were brought up in the November workshop but still not included except for in an alternative which showed it to be an all or none which is not what was requested. By what procedural rule was the County able to exclude those two properties in the DEIR analysis (not as an alternative) to contribute the unmet needs since they were known in November? Will the existing Specific plans be evaluated for increased density in the DEIR prior to submittal to HCD?

39-2

3. **Inconsistent application of Government Code Section 65583.2** The County did not provided the specific mechanism or "program" from HCD that allows the selection of parcels over 10 acres even though the DEIR includes a parcel over 10 acres (Site 26 8989 Auburn Folsom Road). What program or exception enabled the County to include this parcel over 10 acres in the DEIR? Furthermore, in the 2/14/24 Rezoning Board workshop the County proposed to split Site 26 property to get it under 10 acres and it is listed as

39-3

Rezoning DEIR Comments 2/21/2024 – Amber Beckler

39-3 cont.

9.9. acres. Because the information is inconsistent between the DEIR and the 2/14/24 Workshop, what environmental analysis and impacts were evaluated, the full parcel or a proposed split parcel? How did the County include this when it falls outside of the government code criteria?

39-4

4. **Site 26 size inconsistences** On site 26 (8989 Auburn Folsom Rd), the County proposes that the property be split and the southern 9.9 acres be rezoned to the RM-30 high density and given the calculation, it would net out to the 198 units buildable. The rest of the property would remain as Commercial with a combing Design Corridor district which allows mixed use housing. I have a couple of questions that were not answered in the Board workshop:
    - I heard County staff state that that parcel was 17.9 acres but on the County GIS website it is listed as 18.1 acres. How many acres is this parcel in total? I understand in one of the calculations you netted out the stream and riparian vegetation setbacks. Please provide a breakdown of the total acreage and the corresponding elements.
    - I would like to see the site plan for this proposed parcel split. Even after netting out the stream setbacks and vegetation per the description in the staff report, there is significant oak woodland cover on that property especially the southern portion. Given the County's approved policy through the Conservation Plan, with minimization and avoidance measures in place that 9.9 acres would have to be reduced significantly more than what was included hence it wouldn't be possible to build 198 units. Unless the County is using the assumption that they would clearcut the property and pay mitigation so they can build all 198 units. If so, that is in complete violation of the tenants of the County's own policy with the PCCP and the Granite Bay Community Plan Natural Resources Chapter. What assumptions were used in the realistic buildable space on this property?
    - How can the County describe a parcel that does not meet the legal requirements available by public access where the legal description does not match what the County is submitting to HCD (ie. listed as 9.9 acres in the Board Workshop, the DEIR shows it as 17.9, the County GIS site shows 18.1 and the parcel is not split)?



Rezoning DEIR Comments 2/21/2024 – Amber Beckler

5. **Community Plan Amendments** Parcels identified for Rezoning will require amendments to the Community Plans. Why would the amendments to Community Plans or rezoning for properties listed in Table 4 from the 2/14/24 staff report be any quicker than the amendment needed for the amendments to Community Plans or rezoning for the properties listed in Table 7? Why can't the amendments required for properties in Table 7 follow the same path and timing as the properties in Table 4? This question did not get answered in the Workshop.

39-5

6. **General Plan Amendment** The County staff report states that the General Plan amendments will supersede the existing Community Plans (ie. in Granite Bay only 4-10 dwelling units are allowed per acre). What authority does the General Plan amendment take precedence over a Community Plan?

39-6

7. **Equity across Districts** Isn't there a requirement to have equity across districts? At the time of the 2/14/24 Rezoning Workshop, District 4 made up ~35% of the burden of the ~1200 unit unmet need which as I mentioned is not equitable for our district. Why should residents in District 4 be unequally burdened compared to others across the County?

39-7

8. **Accountability to build affordable units** What policy is in place to enforce accountability to build affordable units? The requirements for low and very low income housing is not new and has been deferred in previous building projects. The County has forgiven units by allowing developers to pay in lieu fees which doesn't cover the cost of building to comply with HCD requirements.

39-8

9. County staff stated that Site 26 along with others in Granite Bay were included in the original Housing Element and that there were premium qualifiers or something like that which indicated Granite Bay should be included. The example was schools but then Kally flipped through the handbook to state the others. What specific chapter were these qualifiers included?

39-9

Rezoning DEIR Comments 2/21/2024 – Amber Beckler

39-10 10. What were the proper noticing requirements for this project as no-one in Granite Bay knew about this until late last week. When did the 10-day clock start ticking for signage on each parcel?

39-11 11. Why did the County not include increasing density in existing zoning districts to meet the RHNA requirements? Existing zoning districts such as medium density residential, multi-family designations could have been increased and this would have been better planning zoning changes not triggering a General Plan amendment and would not be considered a Spot Rezones which is not allowed per CEQA?

39-12 12. What project level CEQA analysis would be done if any of the sites were to move forward compared to the Program Level EIR being drafted?

LETTER 39: AMBER BECKLER

Response to Comment 39-1
Chapter 3, Project Description, of the Draft EIR notes that "The site list for rezoning includes 72 properties totaling approximately 235.1 acres. The final list of sites to be rezoned is expected to ultimately contain fewer properties and acreage as the list is refined; however, this EIR will analyze all 72 sites to ensure adequate environmental review regardless of which properties ultimately compromise the refined list."

While the list of properties currently being considered by the BOS for rezoning has been refined from the original proposed list of 72 properties, the list of properties evaluated by the Draft EIR has remained consistent and covers all properties that were considered for potential rezoning. Analysis of all 72 sites in the Draft EIR provides for a conservative assessment of project impacts and is an appropriate approach for a program-level CEQA document.

Response to Comment 39-2
Please see Master Response 3 – County-Owned Sites.

Response to Comment 39-3
Please see Response to Comment 30-3.

Response to Comment 39-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 39-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 39-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 39-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 39-8
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 39-9
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 39-10
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 39-11
Please see Master Response 1 – Non-EIR/Administrative Issues. CEQA does not preclude "spot" rezones and a "spot" rezone can be approved if such an action would be in the public interest. CEQA is not a zoning document.

Response to Comment 39-12

Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 40

3/18/24 Housing Rezone DEIR Comments Amber Beckler

The DEIR fails to clarify how Sites 26 and 34 align with Government Code Section 65583.2. By what mechanism were best practices and requirements waived in order to include Parcels 26 and 34 in the DEIR?

40-1 Large Site Development should not be included in the Rezone program based on Government Code Section 65583.2. Sites should be .5 to 10 acres because they are more aligned to the intent and spirit of the development of affordable units. Placer County has not shown evidence that it would be able to build affordable units on a parcel larger than 10 acres so therefore it cannot be accepted via separate program namely via the proposed HE-52 as part of the Housing Element. Furthermore, HCD best practices promote the selection of "*Sites that do not require environmental mitigation*" (HCD Memo to Planning Directors and Interested Parties June 10, 2020). Clearly in the DEIR, environmental mitigation is proposed on all sites but most particular large parcels that have significant natural biological resources would presumably require extensive impact and therefore mitigation. This extensive environmental analysis would only be fully understood and known through a project level EIR.

40-2 By what methodology does the Programmatic EIR assume that properties (including Sites 26 and 34) contained within the PFG (Potential Future Growth Area) of the PCCP, can mitigate significant biological resource impacts to less than significant level prior to site specific environmental review?

It is only through detailed environmental review on each site (triggered by the environmental review process), that the PCCP participation and therefore avoidance and mitigation measures would be evaluated, determined and ultimately applied to mitigate any significant biological resource impacts to less than significant level. Therefore, the DEIR impact analysis for biological resources is inadequate since there is the potential for significant impacts which cannot be mitigated.

40-3 Section 1.5 Scope of the EIR – Aesthetics incorrectly states that no selected parcels are designated scenic. Site 26 is currently zoned as Commercial with a Design Corridor (CPD-Dc). Per CEQA, is it not required to evaluate all known potential impacts even through a programmatic EIR?

Should the DEIR not include analysis consistent with the Section 17.52.079 for Site 26 based on its underlying zoning?

*Purpose and Intent. The purpose of the design review (-Dc, -Dh, -Ds) combining districts is to provide special regulations to protect and enhance the **aesthetic character** of lands and buildings within public view; to protect historic buildings; to minimize any adverse impacts of conflicting land uses; to enhance tourism*

1

40-3 cont.

through the protection of lands and buildings having unique aesthetic characteristics; and to provide special project review procedures for lands and uses which by their nature require special attention to architectural design and massing, landscaping, circulation, and/or energy conservation.

40-4

Site 26 and Site 34 should be removed from the RHNA Rezoning inventory. These large parcels will require detailed environmental review and impact analysis that is not included in the draft Programmatic EIR. **By removing these two Sites 26 and 34** (over 10 acres) from the rezoning inventory, it:

- Removes the conflict with Government Code Section 65583.2
- Aligns with HCD best practices
- Minimizes the risk of legal action on the grounds of proper CEQA analysis that is required for all known and possible impacts and cannot be assumed through mitigation by the PCCP prior to the proper environmental evaluation.

Since this is a Programmatic EIR, it is unknown if mitigation measures are possible to achieve less than significant impacts and therefore the alternatives also may not be able to meet its objective. By removing these two Sites 26 and 34, it also removes a controversial and unvetted newly proposed HE-52 policy that would allow large lot development for affordable housing with no evidence of efficacy, promotes streamlining of the development process making it difficult for neighbors to provide adequate feedback on highly controversial sites and there is absolutely no enforcement mechanism that affordable housing would be built onsite. This is ripe for abuse now and into the future.

The removal of Site 26 (246 units minimum) and Site 34 (112 units minimum) from the DEIR and the RHNA Rezoning inventory would bring the current inventory of properties comprised of 1,402 minimum units down to 1,044 minimum units which is within the 75% threshold that is required to request an extension from HCD.

The extension should be requested so that County staff can properly evaluate ALL County–owned properties (both at Cincinnati Ave and throughout the County), plus ensure that that small set of willing property owner sites (less than 10 acres) contextually fits within the surrounding zoning and consider redevelopment/infill projects. In addition, an evaluation of an increase in existing high and medium density zoning minimum units nominally from 20 to 22 could provide sufficient units while meeting with the intent not to concentrate and segregate affordable housing units.

LETTER 40: AMBER BECKLER

Response to Comment 40-1

Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 30-3.

Response to Comment 40-2

Please see Chapter 5, Biological Resources, of the Draft EIR for a discussion of mitigation measures, including PCCP measures.

Response to Comment 40-3

The Draft EIR is not required to include an analysis of aesthetics in relation to the Zoning Ordinance, because CEQA is not a zoning document. Section 17.52.0790 of the Zoning Ordinance requires that projects on sites that include a combining -Dc zoning designation undergo a review to ensure the project would comply with any special regulations applicable to the design of the site and/or any proposed buildings. For example, if Rezone Site #26 were to be rezoned to RM30, the combining -Dc designation would remain. This would be done to ensure that future residential or mixed-use project complies with the Placer Couty Multifamily and Mixed Use Design Guidelines. The Guidelines include requirements for height, setbacks, open space, and other development standards to provide guidance for achieving high quality design for this kind of housing in unincorporated areas of Placer County.

The zoning of the site is not the same as a State, federal, or local designation as a “scenic vista.” Auburn-Folsom Road is not designated by federal, State, or local agencies as a “scenic highway.” Rezone Site #26 is not under any recorded conservation easements and the site is a privately owned property that does not support public trails. The Draft EIR includes a discussion of the development guidelines and procedures future development would be subject to, and identifies mitigation measures for future residential projects that would reduce potential impacts to public viewpoints.

Response to Comment 40-4

The Draft EIR identifies mitigation measures for future site development consistent with CEQA. The programmatic nature of the analysis does not mean that “it is unknown if mitigation measures are possible to achieve less than significant impacts.” Please see Chapter 5, Biological Resources, of the Draft EIR. The ultimate decision to include or remove sites from consideration for rezoning is under the authority of the Board of Supervisors.

For general information purposes relative to the Site Inventory (i.e., not the site analysis in the Draft EIR), two of the 19 sites that the Board directed staff to continue considering for the rezone program are larger than ten acres, including Sites 26 & 34. The constraints analysis for Site 34 is consistent with the California Department of Housing and Community Development (HCD) guidance for large sites, which is a site greater than 10 acres. The HCD Sites Inventory Guidebook requires a further “large site analysis” for sites greater than 10 acres, however if a site is less than 10 acres a then a “large site analysis” is not required. For the purposes of the Site Inventory, the County analyzed the development potential based on the Biological Resources Assessment prepared for the EIR as well as County habitat mapping to determine the size of the resulting potential development area. For Site 34, the analysis shows that the potential development area is less than 10 acres and therefore a “large site analysis” was not prepared; HCD does not require such an analysis for all rezone sites. In the instance of Site 26, the potential buildable area

exceeds 10 acres based on the constraints analysis. A large site analysis was prepared in the Housing Element Amendment and programs developed specific to large sites, consistent with HCD guidelines. In addition, please see Response to Comment 30-3.

Letter 41

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Follow-up questions on the Rezoning Workshop
Date: Tuesday, February 20, 2024 9:36:00 AM
Importance: High

From: Amber Beckler <zagnut@hotmail.com>
Sent: Friday, February 16, 2024 10:12 AM
To: Christopher Pahule <cpahule@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Michael Spelis <MichaelSpelis@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Gregg McKenzie (CDR) <GAMckenz@placer.ca.gov>
Subject: Follow-up questions on the Rezoning Workshop
Importance: High

Hi Kally and Chris,

I wanted to first say that I appreciate all the work that you have done up to this point and this is not easy.

I hope with the addition of the two parcels from Cindy's district and getting the two County-owned parcels AND renegotiating the Specific Plans for higher density (which absolutely should be done before final submittal), at least Site 26 can be evaluated for removal from the Rezone list and maintain its more appropriate landuse that is consistent with the surrounding parcels and the Community Plan. It allows for ~80 units that was already identified in the Housing element while preserving the many natural features on the property.

There are several follow-up questions that I would like to get answered asap so that I can make comments on the DEIR well before next Thursday's planning commission meeting.

Thanks!
Amber

41-1

1. I would like to have the revised parcel inventory that was part of the approved motion for the new Table 4 along with the summarized burden by District showing the various columns. Before the motion, District 4 made up ~35% of the burden of the ~1200 unit unmet need which as I mentioned is not equitable for our district.

41-2

2. On site 26 (8989 Auburn Folsom Rd), the County proposes that the property be split and the southern 9.9 acres be rezoned to the RM-30 high density and given the calculation, it would net out to the 198 units buildable. The rest of the property would remain as

Commercial with a combing Design Corridor district which allows mixed use housing. I have a couple of questions about this:

- I heard County staff state that that parcel was 17.9 acres but on the County GIS website it is listed as 18.1 acres. How many acres is this parcel in total? I understand in one of the calculations you netted out the stream and riparian vegetation setbacks. Please provide a breakdown of the total acreage and the corresponding elements.

41-2 cont.

- I would like to see the site plan for this proposed parcel split. Even after netting out the stream setbacks and vegetation per the description in the staff report, there is significant oak woodland cover on that property especially the southern portion. Given the County's approved policy through the Conservation Plan, with minimization and avoidance measures in place that 9.9 acres would have to be reduced significantly more than what was included hence it wouldn't be possible to build 198 units. Unless the County is using the assumption that they would clearcut the property and pay mitigation so they can build all 198 units. If so, that is in complete violation of the tenants of the County's own policy with the PCCP and the Granite Bay Community Plan Natural Resources Chapter. Please advise on your assumptions and the building footprint.

41-3

5. County staff stated that Site 26 was included in the original Housing Element and that there were premium qualifiers or something like that which indicated Granite Bay should be included. The example was schools but then Kally flipped through the handbook to state the others. I'd like to have the reference to that information.

41-4

6. I would like to get my question answered from my initial written submission: The County staff report states that the General Plan amendments will supersede the existing Community Plans (ie. in Granite Bay only 4-10 dwelling units are allowed per acre), what authority does the General Plan amendment take precedence over a Community Plan with the new RM-30 designation? Why is a General Plan amendment needed versus adding the Zoning designation only? Either way, as confirmed in the last MAC meeting, the Community Plan can have more restrictions than the County Zoning. Why is this no longer the case with the Rezone?

41-5

7. What were the proper noticing requirements for this project as no-one in Granite Bay knew about this until late last week. When did the 10-day clock start ticking for signage on each parcel?

41-6

8. If the Site 26 property were to remain as Commercial with mixed use housing, what is the potential housing units (minimum and maximum) that could be built after netting out the constraints on the property. In the Housing element table, I see that it shows 88 units reasonable. Is that after netting out all of the natural features?

41-7

9. If the County identified the two County-owned properties during the November workshop, why weren't those properties included in the DEIR? There was reference that these properties can't be evaluated because they are not in the DEIR in addition to the time to amend the Sunset Area Plan.

LETTER 41: AMBER BECKLER

Response to Comment 41-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 41-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 41-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 41-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 41-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 41-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 41-7
Please see Master Response 3 – County-Owned Sites.

Letter 42

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Public Comment and Clarification Requested - 2/13 BOS Hearing on Rezoning Item
Date: Tuesday, February 20, 2024 9:18:26 AM

From: Amber Beckler <zagnut@hotmail.com>
Sent: Monday, February 12, 2024 1:01 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; bos@placer.ca.gov
Cc: Megan Wood <MWood@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Jim Holmes <JHolmes@placer.ca.gov>; Shanti Landon <SLandon@placer.ca.gov>; Bonnie Gore <BonnieGore@placer.ca.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Michael Spelis <MichaelSpelis@placer.ca.gov>
Subject: Public Comment and Clarification Requested - 2/13 BOS Hearing on Rezoning Item

Hello Board of Supervisors and Placer County Staff,

I'm reaching out because the County Proposed Rezoning effort is confusing and portions are fairly deceptive and difficult for the average person to understand and be able to provide comment. I am very experienced in County landuse and this type of analysis and found the Proposed Rezone proposal to be confusing even with my level of experience. My request of the Board of Supervisors is to defer the vote scheduled on 2/13 at 2PM until the Rezoning information is clearly written so the public understands and can comment on the full impact of the rezone.

A few of my specific questions related to the proposed Rezoning are below and I would like the County to provide explanations to what seem to be inconsistencies in the Proposed Rezoning plan.

My specific comments/questions:

42-1 **1. County-owned parcels and Sunset Area Plan Amendment:** Why are the two County owned parcels identified in Table 7 excluded from the Table 4 inventory when they meet the requirements?

Only after the public requested that other County owned property be evaluated, did the County staff include the 2 sites in the Sunset Area Plan that could be modified to accommodate high density units. These two sites comprise 528 units- which is almost HALF of the required shortfall of 1,219 units. The staff report mentions that it would take too long to make the necessary modifications and amend the Sunset Area Plan by May.

I recognize that amending the Sunset Area Plan to include these two parcels may require more effort than others on the list of parcels. As a resident of Placer County, my preference is to do it right and include the County owned parcels to minimize the impact on existing communities.

42-2 **2. Privately-owned parcels in Sunset Area Plan**: Given the planned growth in D2 and the Sunset Area Plan, can there be privately owned parcels rezoned to include higher density to meet the requirements within that area rather than placing the burden on existing planned communities?

3. Inconsistent application of Government Code Section 65583.2: The County defined criteria to identify specific parcels yet the parcels selected show inconsistent application of the criteria. Why were there exceptions to the criteria for identifying potential parcels to be rezoned?

42-3

Per the staff report, Government Code Section 65583.2. was used to determine sites in the inventory. One of the requirements is **Size:** Sites between half an acre and 10 acres.

Site 26 (8989 Auburn Folsom Road) is 18.1 acres and was included in the inventory in Table 4 only after County staff proposed a split of the property to meet the criteria.

Site 74 on Bell Rd is 15.9 acres was not proposed as a split parcel to meet criteria nor was it included in the inventory in Table 4.

Site 26 (8989 Auburn Folsom Road) is already zoned as Commercial which allows mixed use residential which is appropriate for that area and the existing infrastructure. There seems to be no valid reason provided in any of the reports as to why Site 26 and only Site 26 needs to be split to accommodate the County's criteria.

Based on the County's criteria, neither parcel Site 26 or Site 74 should have been included in the list. It seems that the County has gone out of its way to propose a split of Site 26 to make it fit the criteria. This seems inconsistent in the way other parcels were selected and added to the list.

Why were the criteria applied inconsistently?

4. Amending Community Plans: Parcels identified in both Table 4 and 7 will require amendments to the Community Plans yet the proposal is to proceed with Table 4 and not Table 7 based on the time required to process the amendment. Why would the amendments to Community Plans or rezoning for properties listed in Table 4 (the inventory) be any quicker than the amendment needed for the amendments to Community Plans or rezoning for the properties listed in Table 7? Why can't the amendments required for properties in Table 7 follow the same path and timing as the properties in Table 4?

42-4

The County staff report states that the General Plan amendments will supersede the existing Community Plans (ie. in Granite Bay only 4-10 dwelling units are allowed per acre), what authority does the General Plan amendment take precedence over a Community Plan?

5. Actions on the Agenda are incomplete: Moving forward on the Proposed Rezone analysis without separate actions for Community Plan Amendments or changing selection criteria seems to be a violation of the Brown Act. By taking action today, the Board would be essentially taking action on approval of Community Plan Amendments and approval of changing the original selection criteria to now include parcels over 10 acres which are not on the current agenda.

42-5

6. **Policy to include enforcement and accountability:** The requirements for low and very low income housing is not new and has been deferred in previous building projects. I understand that the County needs to comply with HCD requirements. I'm asking that the County thoughtfully devise a solution rather than rushing into something which results in even bigger problems in the future. This current Proposed Rezoning seems to be a short-term patch rather than a well though out, sustainable solution.

42-6

42-6 cont.

This seems to be an exercise to get the numbers to fit and check the box rather than an effort to truly solve the problem of affordable housing. What action will the Board of Supervisors take to ensure that the affordable units identified as a gap will in fact be built. The current Proposed Rezoning does nothing to ensure enforcement to build these units.

In closing, given the discrepancies in selection and that items may be missing from the agenda for action that should be included based on the Proposed Rezone, I would appreciate the Board provide responses to my questions and suggest that action be deferred until some of the issues I raised are addressed in a more clear and cohesive way so that the public can understand and comment on the impacts.

Thank you,

Amber Beckler

Granite Bay

LETTER 42: AMBER BECKLER

Response to Comment 42-1
Please see Master Response 3 – County-Owned Sites.

Response to Comment 42-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 42-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 42-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 42-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 42-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 43

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element Program HE-1 Rezoning next to Cavitt School
Date: Tuesday, February 20, 2024 9:19:03 AM

From: Jim Beckmeyer <jebeckmeyer@gmail.com>
Sent: Monday, February 12, 2024 4:19 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Jim Beckmeyer <jebeckmeyer@gmail.com>
Subject: Housing Element Program HE-1 Rezoning next to Cavitt School

Dear Suzanne, Board of Supervisors, Anyone else I can Find,

My name is Jim Beckmeyer. I live at 8852 Bronson Drive, Granite Bay. Our house is around the corner from Cavitt School. We have lived here since 1986.

43-1

The overcrowding and corresponding traffic in Granite Bay is ridiculous and dangerous. Auburn Folsom Road and Douglas have developed in to a nightmare corridor of traffic on both week ends and week days. Fuller drive is a subset of this issue, especially during school starting and ending hours. I'm surprised a child or parent has not been run over as cars park for school drop off and pick up all along Fuller. Weekly I see cars running red lights at the intersections of Eureka and Auburn Folsom, Fuller and Auburn Folsom, and Douglas and Auburn Folsom. Jamming increased housing density in to this corridor is irresponsible, and will no doubt increase the likelihood of serious injury. Please do not add fuel to the traffic nightmare that's been developing over the past years.

43-2

The notice for the meeting on the 13th has not been well communicated through our community so my schedule does not allow me to attend in person. I am happy to schedule time with anyone in the decision tree for a friendly common sense conversation at a location of their choice.

Thank you,
Jim Beckmeyer
916-835-4084

LETTER 43: JIM BECKMEYER

Response to Comment 43-1

As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Please also see Master Response 4 – Traffic Safety.

Response to Comment 43-2

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 44

From: Kelly Kerlinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: High Density Rezone Sites 71 and 72 Lincoln Way
Date: Thursday, March 14, 2024 2:22:39 PM

From: Courtney Berger <croseberger@gmail.com>
Sent: Wednesday, March 13, 2024 6:35 PM
To: Board Clerk <BoardClerk@placer.ca.gov>
Subject: High Density Rezone Sites 71 and 72 Lincoln Way

Hello,

I live in the neighborhood and strongly oppose high density housing in this location.

44-1 There is already heavy traffic on that turn and adding a driveway with numerous cars entering/exiting creates a traffic hazard. I also have grave concerns about safe evacuation in the event of a fire evacuation. Time is of the essence in evacuations and this high density housing would create a huge traffic backup.

If you have any further questions, please let me know

Courtney Blumer
450 Foresthill Ave, Auburn, CA 95603

LETTER 44: COURTNEY BERGER

Response to Comment 44-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. In addition, potential impacts related to fire evacuation are addressed under Impact 10-2 in Chapter 10, Fire Protection and Wildfire, of the Draft EIR.

Letter 45

From: Cheryl Berkema
To: Placer County Environmental Coordination Services
Subject: Fwd: Public Comment RHNA Rezone
Date: Wednesday, February 21, 2024 5:00:34 PM
Attachments: RHNA Rezone Timeline.pptx

Please forward my comments to the Planning Commission for the DEIR comments

--------- Forwarded message ---------
From: **Cheryl Berkema** <cheryl.berkema@gmail.com>
Date: Tue, Feb 13, 2024 at 11:32 AM
Subject: Public Comment RHNA Rezone
To: bos@placer.ca.gov <bos@placer.ca.gov>, Suzanne Jones <SuzanneJones@placer.ca.gov>, Supervisor Holmes <jholmes@placer.ca.gov>, Shanti Landon <SLandon@placer.ca.gov>, Bonnie Gore <BonnieGore@placer.ca.gov>, Cindy Gustafson <cindygustafson@placer.ca.gov>, Michael Spelis <MichaelSpelis@placer.ca.gov>
Cc: kkedinge@placer.ca.gov <kkedinge@placer.ca.gov>, Megan Wood <MWood@placer.ca.gov>, Christopher Pahule <cpahule@placer.ca.gov>, Cheryl Berkema <cheryl.berkema@gmail.com>

Hello Supervisors and Planning Staff,

45-1 We are here today under 2 falsely promoted assumptions (1) that the state is just now coming up with a "new requirement" that Placer must show RHNA numbers for low income housing can be met throughout the current housing element, (2) that Placer unincorporated existing residents should pick up the shortfall. The County owes an explanation why residents are expected to pay for the RHNA shortfall when the county knew it was not meeting their 2013-2021 Housing Element obligation. The County Supervisors Gore, Weygandt (ret), Holmes, Uhler (voted out of office) and Gustafson ignored their Housing Element obligation. Instead, these supervisors repeatedly approved amendments for special interests, accepted in-lieu fees, or forgave the obligations completely. Residents pay their tax obligations when they are due or they are penalized; the County is expected to meet their Housing Element obligations on time. So we are here today because those supervisors defaulted on their Housing Element obligations.

Transparency

45-2
- The Notice Of Preparation for this program was posted in the Sacramento Bee, a paid subscription, rather than in the local community publication on a subject to remedy affordable housing shortfall. That pretty much sums up Planning's intent to keep the project from being communicated to residents.
- All public feedback should be posted on the Rezone website. The public should not have to sift through staff reports in multiple places to see public comment. The EIR scoping meeting should have minutes included on the Rezone website.
- Expecting residents to go to multiple places to find the history of the project is confusing to the public.
- Confusing the EIR feedback with the workshop feedback not providing "after comments to the public" also shows a lack of project management. Some of this has been corrected, but many residents are frustrated with the lack of notice and inability to find information.

Insufficient diagrams for residents to be able to visualize the rezones

45-3

- I have made requests from county staff to provide County owned properties on the rezone maps by districts including job centers and amenities. Other residents have requested the same. The context of these properties compared to the proposed rezone properties needs to be a visual. All properties that could qualify should be shown side by side to help provide context.

Traffic

45-4

- I have made requests for Level Of Service (LOS) for all major intersections in Granite Bay along Auburn Folsom, Eureka, Sierra College and Douglas Blvd. The information still has not been provided.Some Granite Bay intersections are LOS F.
- Granite Bay has not had a traffic study since 2012 with the update of the Community Plan.Granite Bay has had many accidents and deaths. The safety of existing residents should be the top priority.

Signage

45-5

- Proposed Rezone signs have not been posted on Granite Bay.If they are on the ever revolving list then they should be posted. Properties.County staff has not done due diligence in notifying residents. Have residents within 300 ft been notified?
- Have signs been posted on ALL of the proposed rezone properties in the County?

Criteria for rezone parcels & change control

45-6

- The criteria for property inclusion should have been determined with the notice of preparation which is expected to describe the project in sufficient detail.
- A sliding set of properties shows lack of change control for the project.The superset of properties: county properties, specific plans, volunteered private properties , and amended Sunset Area Plan should have been determined and then properties removed from the list as they were disqualified. The criteria for the projects should remain consistent. If parcels meet the criteria then they should be ranked. Properties that do not meet the criteria should then be excluded. Properties should not be able to be "modified" to meet the criteria- this would be an infinite loop and suspect to provide special treatment to individual property owners.

Incomplete analysis

45-7

- **The Draft EIR fails to identify why County owned properties are being excluded from the rezones.**
- The draft EIR fails to provide hybrid solutions. The County has received significant feedback that specific plans, a Sunset Area Plan/Placer Ranch amendment, and District 2 additional rezone acreage inclusion.
- The county has failed to explain why they cannot/did not **purchase suitable areas** for the RHNA Rezone. Planning has had years to come up with solutions.

45-7 cont.

- The County has failed to include Specific plans in the plan. Planning has had years to come up with solutions, not having time now is a poor performance indicator not a valid excuse, **If Planning cannot get their work done within the specified timeframe ask for an extension. The deadline was well known in advance.** There are specific plans on the active projects list (applications pending). New project proposals should not be considered until the county fixes the shortfall of RHNA rezones. If the county cannot manage their workload to meet their obligations they should have a moratorium on new developments.

Social Justice

45-8

- The County has also failed to adequately explain the disparity of high density low income parcels in the Auburn area and low- medium density high income properties that use ADUs as their affordable obligation in West Placer.

Lack of a Master Plan for County infrastructure and services to support housing obligations

45-9

- The RHNA rezone was a housing program proposal by the Housing Manager to correct Placer's Housing obligation deficits, with no "actual communicated plan" for the Countywide infrastructure required to support the rezones. The County owes an explanation on the significant infrastructure funding provided to West Placer high income low density area for future residents for roads & sewers, for the sewer study for Auburn area with an incomplete Auburn General Plan update to justify low income high density developments. Auburn already has a significant number of high density low income residents.
- Piecemeal infrastructure spending resolutions by the County to create the illusion that they are solving individual community challenges while in reality setting up a system where West Placer low density high income residents will reside with ADUs accepted for their affordable housing obligation, Auburn is targeted for high density low income residents, and rural residents are targeted to have clusters of high density to subsidize the County's shortfall in RHNA numbers without adequate infrastructure and services. Where is the infrastructure spending for those rural residents?

The County needs to pick up the tab for their default through hybrid solutions that include county owned properties, specific plans, an amendment to the Sunset Area Plan and new development. The County should ask for an extension from the state. Pay your bills.

Thank you for the opportunity to provide feedback. Please include my comments as part of the Administrative Record,
Cheryl Berkema
Placer County Resident

LETTER 45: CHERYL BERKEMA

Response to Comment 45-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 45-2
Please see Master Response 1 – Non-EIR/Administrative Issues. The Draft EIR was prepared in compliance with all applicable provisions of CEQA and County Code related to noticing including published notices.

Response to Comment 45-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 45-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 45-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 45-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 45-7
Please see Master Response 3 – County-Owned Sites. County-owned properties were not excluded from the rezones, and Chapter 12, Alternatives, of the Draft EIR includes a discussion of publicly-owned lands. Page 12-6 of the Draft EIR states, "While some publicly-owned sites were ranked highly by the Site Evaluation Tool, such sites were not considered for the rezone due to either existing development on the site, being owned by other public agencies other than Placer County, or being too small unless aggregated with an adjacent site." The Housing Element identified 406 lower-income units on the Placer County Government Center in North Auburn; the Government Center Master Plan permits densities of 21-30 units per acre and therefore a rezone was not needed for these units. The County is proposing to rezone two County-owned properties in the Sunset Area Plan. The Housing Element identifies lower-income units in the Specific Plans.

Response to Comment 45-8
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 45-9
Infrastructure information for unincorporated Placer County is discussed in the Housing Element, including the Amendment submitted to HCD in February, the Site Inventory Forms included as Appendix C to the Draft EIR, and Section XIX, Utilities and Service Systems, of the Initial Study.

Letter 46

Board of Supervisors hearing on RHNA Rezones

November 27, 2023

Good morning Supervisors,

The reason for the RHNA Rezones program is listed by Placer Planning to be:

Because the Housing Element did not identify sufficient sites to accommodate the RHNA across all income levels, state law requires the County to implement a rezone program to allow higher density residential development.

46-1 The question to be asked is: Why Placer County's Housing Element did not identify sufficient sites? The most recent budget report 2022-2023 Adopted Budget the CEO identified **Critical Success Criteria:** https://www.placer.ca.gov/DocumentCenter/View/61990/Budget-Overview-PDF

Placer County has epic fails across ALL Adopted Budget CEO identified **Critical Success Criteria**. The most egregious county fails are:

- Community Engagement
- Diversity of Achievable Housing Throughout the County
- Public Serving Infrastructure and Amenities
- Fiscally Sustainable Public Safety Services
- Balanced Land Use Planning and Environmental Stewardship

Placer County has failed to meet the ~55% extremally low, very low, and low income levels obligations in both the fifth (2013-2020) and sixth (2021-2029) housing elements. Placer County has instead accepted in lieu fees rather than construction of affordable units, forgiven special interest developments' housing obligations, and forgiven workforce housing obligations from special interests. However, the obligations for those RHNA numbers still exist.

46-2 Signs have not been posted on the 74 properties identified in the Notice of Preparation.

On November 3, 2021 EIR scoping meeting a public request was made for ALL Placer properties and their acreage to be provided to the public. As of November 27, 2023 all Placer sites and acreage have not been identified. This is a Brown Act Violation.

- All Placer owned properties and their acreage need to be identified on the maps of proposed RHNA rezones by district.
- The goal should be to have commercial properties with affordable housing units on top.

46-2 cont. Placer County has strategically "predetermined housing placement type" by systematic approval of the location of infrastructure funding using the Sunset Area Plan County funding, the American Recue Plan Act funding, and Supervisor Bonnie Gore's representation on SACOG's "Green means Go" infrastructure funding. The result of this spending is homogenous low-density above-moderate-income housing in the Sunset Area whose benefactors are special interest developers and the burden of the clustering of low income high density developments to be burdened by rural residents in Auburn, Penryn, and Granite Bay.

46-3 The Director of Planning when asked about the specific plans said time was of the essence, EIRs would be needed. Placer Planning has had 3 years since the draft element was submitted to HCD. Poor time management and performance are not valid excuses for excluding the specific plans from the rezone proposal. The Specific plans where the infrastructure and amenities lie are completely unburdened with this proposal. The Specific plans have delivered zero in affordable housing. The systematic predetermination of housing placement type" by systematic approval of the location of infrastructure funding is a misuse of County funds and misuse of the trust that Placer residents have placed in their elected officials.

46-4 In analyzing the RHNA Rezone proposal, the cost of parcels and impact on housing needed for more than 50% of PC residents will not be addressed, legislative requirements of engaging residents of the proposed rezones has not happened, and the proposed concentration of affordable communities is creating a disparity. HCD has expressed concerns over the clustering of high-density low-income units, yet this is exactly what is being proposed. To further exacerbate this proposal, the other Housing Programs such as Group homes of 7+ in Rural Residential have not been cumulatively analyzed with the RHNA Rezone. The proposal fails to identify the RHNA rezones not to be used as comparables for future development. This opens the door for planning abuses.

46-5 I encourage Placer Supervisors to ask for an extension of time from the state to internally audit your own infrastructure spending and its correlation to housing segregation with this proposal and to delay any decision on this proposal until all County parcels with acreage have been identified and the infrastructure spending impacts on segregation are understood. Failing to do so, a California State Attorney General Audit of HCD & Placer County transactions, Placer County RHNA numbers, Placer rezone proposal, and Placer infrastructure funding to segregate is needed to evaluate the Placer Housing Element 2013-2020 and 2021-2029 programs and results.

46-7 I also encourage the Supervisors to place a moratorium on any large development and specific plan proposals until the housing disparity and County spending on infrastructure is understood.

Thank you for the opportunity to provide comment on the rezones.

Cheryl Berkema
Placer County Resident

To: Planner for the Housing Element Amendment;

CC: Placer Board of Supervisors;

CDRA Director, Planning Director; Executive Director PCCP

CC: Housing and Community Development (HCD) Staff

This Amendment was not properly noticed, did not have sufficient review period, did not follow standard Placer County procedures of being presented to the Municipal Advisory Councils for both information and action items, and Housing Program -52 was hidden within Housing Element -1 on both the Board of Supervisors Feb 13, 2024 agenda items and in the voting resolutions. Using language "Direct staff to submit the properties listed in Table 4 of the staff report and **related Housing Element amendments** to the State Department of Housing and Community Development following the required public posting period for consideration" is a deceptive way to hide amendments within other amendments. Placer County was aware of the shortfall of RHNA numbers during the 2013-2021 Housing Element but failed to course correct allowing development to provide in lieu fees and forgiven obligations. Placer Planning's proposal with RM-30 is to have rural unincorporated residents pick up the shortfall of RHNA units and the Housing Element Amendment allows for installation of a loophole in the system to allow developers to streamline future development of high-density-high income residences with design reviews.

RM-30 proposes a "use" for Senior living. Granite Bay has a dozen senior living centers which are for higher income individuals. Granite Bay is number 3 in the nation for senior beds per capita. Without deed restriction, HCD is being presented with the false narrative by Placer County that RM-30 does anything to add to extremely low, very low, or low housing RHNA numbers. Granite Bay property values are too high for developers to be feasible to build low-income units. Higher density does not equate to affordability. Placer Planning is using the RHNA shortfall to create a system that allows the County to continue to default on their housing obligations and just keep reusing the RM-30 zoning as a credit card to keep paying for RHNA shortfalls. The streamlining feature is another example of scope creep for the problem being addressed. A programmatic EIR being produced in parallel has not been approved and t does not address significant impacts, inadequate infrastructure, inadequate services, lack of amenities, and cumulative impacts in communities.

A much simpler solution of a Zoning Text Amendment could be created by increasing density in already denser multi-family and commercial areas where the impacts are already expected. Placer County is land rich. This solution could be viable for many years. Placer County is listening to special interests rather than residents in unincorporated Placer.

County properties were removed from selection in the DEIR without explanation. Specific Plans were also excluded even though over the past decade they have had multiple extensions, multiple changes/amendments (which open up contracts) and the Sunset Area Plan have all been excluded from the list of properties in this amendment. These should be prioritized as the highest because they have the infrastructure and funding. The HCD website also lists the priorities that surplus properties should be given and actively pursued for development. In addition, all districts do not have a similar distribution of RHNA. The proposed properties in Granite Bay comprise 34% of the RHNA shortfall. District 2 has nothing.

The sites proposed in District 4 Granite Bay are in direct conflict with the Granite Bay Community Plan. Granite Bay has high, medium, and low densities incorporated into the Granite Bay Community Plan and we are close to buildout in population. The Granite Bay Community Plan was approved by Placer County Supervisors in 2012. He plan was thoughtfully designed with smart design and consideration for residents. Placer Planning's proposal is also avoiding addressing the Placer County Conservation Program (PCCP) which requires environmental assessment and has much higher fees than will be received by Placer streamlining of projects. The CDRA director should clearly be articulating and addressing the conflict present in this proposal with the PCCP, as should the PCCP Executive Director. The Traffic Circulation Element in Granite Bay has not been updated in over a decade. Please see attached for major accidents and deaths provided by California Highway Patrol. Placer Planning and Placer Department of Public Works have not provided similar information in the DEIR for RHNA Rezones. Additionally, because jobs and affordable markets are not available in Granite Bay, VMT will be increased. We have one sheriff and have closed 2 fire stations. Granite Bay residents voted down the last increase for fire services. In addition, our schools are full.

Placer County Supervisors Bonnie Gore, Cindy Gustafson, and Jim Holmes have voted to provide services, funding, and infrastructure to new development areas in Districts 1 and 2. Sewer service and dollars for an Auburn General Plan have been provided to Auburn to design disparate communities. This infrastructure funding should be examined by HCD for the unequal distribution of housing that is being created.

I respectfully request (1) HCD not approve the Housing Element Amendment in its entirety; (2) HCD provide Justification of the RHNA numbers and shortfall in the 2021-2029 Placer Housing Element; (3) HCD grant an extension to allow Placer County to include Placer County owned properties in the shortfall, amend the Sunset Area Plan, include specific plans in the shortfall, and for Placer County to evaluate a Zoning Text Amendment in the DEIR as an alternative to satisfy the RHNA shortfall and provide the requested buffer.

Please see attachments for traffic accidents and deaths in District 4, timeline for RHNA shortfall, and comments to Placer Board of Supervisors opposing the creation of Housing Element policies by Placer County that promote high density/low income communities and low density/high income often gated communities that allow ADUs for affordable housing. These proposed policies promote disparity.

Please include my comments as part of the Administrative Record for The Housing Element Amendment and for the DEIR.

Respectfully,

Cheryl Berkema
Placer County Resident

RHNA Rezone: Placer Creates Deficit then Proposes Rural Residents in Auburn, Penryn, & Granite Bay Pay



1. **Housing Element (2013-2021) low & very low income repeatedly ignored by Supervisors: Gore, Weygandt, Holmes, Uhler, & Gustafson**
   - ***Housing Manager fails to advocate*** *to correct affordable housing deficit for Specific Plans and large developments proposals*
   - *Supervisors continue to grant amendments and variances without correcting deficit*
2. **Sunset Area Plan/Placer Ranch the largest plan in Placer History approved with known RHNA deficit**
   - Only 10% affordable housing required
   - Huge entitlements granted to special interests
   - Alliance for Environmental Leadership alternative rejected with **more affordable housing deemed "too dense"**
3. **Sunset Area Plan & Housing Element Draft for 2020-2029 approved within a year of each other transferring deficit to rural residents**
   - Planning has had years to provide a solution, now claims time constrained
   - Housing Manager works with State Housing and Community Development (HCD) to ***transfer RHNA deficit to rural residents***
   - Federal American Rescue Plan $28 M dollars targeted for Sunset Area infrastructure ***benefitting low density high income***
   - Bonnie Gore on SACOG, knows the RHNA numbers, procures funds to position Auburn area as ***high density low income***

Recommend ***"hybrid solution"*** *that includes county owned properties, specific plans, amendment to Sunset Area Plan, moratorium on development, and an extension from the state*

Crash Year	2012					
Location	**Total Crashes**	**Fatal Crashes**	**Injury Crashes**	**Property Damage Only Crashes**	**Killed Victims**	**Injured Victims**
Douglas Bl and Cavitt Stallman Rd	3	0	0	3	0	0
Douglas Bl and Seeno Av	2	1	0	1	1	0
Douglas Bl and Berg St	4	0	3	1	0	4
Douglas Bl and Barton Rd	18	0	9	9	0	10
Douglas Bl and Joe Rodgers Rd	5	0	1	4	0	1
Eureka Rd and Wellington Wy	3	0	1	2	0	1
Auburn Folsom Rd north of Eureka Rd	7	0	4	3	0	6
Auburn Folsom Rd north of Oak Hill Dr/Beals Point	2	0	2	0	0	2
Grand Total	**44**	**1**	**20**	**23**	**1**	**24**

Crash Year	2013					
Location	**Total Crashes**	**Fatal Crashes**	**Injury Crashes**	**Property Damage Only Crashes**	**Killed Victims**	**Injured Victims**
Douglas Bl and Cavitt Stallman Rd	5	0	2	3	0	4
Douglas Bl and Seeno Av	1	0	0	1	0	0
Douglas Bl and Berg St	1	0	0	1	0	0
Douglas Bl and Barton Rd	8	0	1	7	0	2
Douglas Bl and Joe Rodgers Rd	1	0	0	1	0	0
Douglas Bl and Iris Pl	2	0	1	1	0	1
Barton Rd north of Eureka Rd	1	0	1	0	0	1
Eureka Rd and Wellington Wy	2	0	0	2	0	0
Auburn Folsom Rd north of Eureka Rd	11	0	5	6	0	6
Grand Total	**32**	**0**	**10**	**22**	**0**	**14**

Crash Year	2014					
Location	Total Crashes	Fatal Crashes	Injury Crashes	Property Damage Only Crashes	Killed Victims	Injured Victims
Douglas Bl and Cavitt Stallman Rd	4	0	1	3	0	2
Douglas Bl and Seeno Av	2	0	1	1	0	1
Douglas Bl and Berg St	3	0	1	2	0	1
Douglas Bl and Barton Rd	7	0	6	1	0	6
Douglas Bl and Joe Rodgers Rd	1	0	1	0	0	1
Douglas Bl and Dover Dr	1	0	0	1	0	0
Barton Rd south of Eureka Rd	1	0	1	0	0	1
Eureka Rd and Greyhawk Dr	1	0	0	1	0	0
Eureka Rd and Wellington Wy	3	0	0	3	0	0
Auburn Folsom Rd north of Eureka Rd	11	0	4	7	0	4
Auburn Folsom Rd north of Fuller Dr	1	0	0	1	0	0
Grand Total	35	0	15	20	0	16

Crash Year	2015

Location	Total Crashes	Fatal Crashes	Injury Crashes	Property Damage Only Crashes	Killed Victims	Injured Victims
Douglas Bl and Cavitt Stallman Rd	6	0	3	3	0	5
Douglas Bl and Seeno Av	7	0	4	3	0	4
Douglas Bl and Berg St	3	0	2	1	0	2
Douglas Bl and Barton Rd	11	0	5	6	0	7
Auburn Folsom Rd north of Eureka Rd	4	0	1	3	0	2
Grand Total	**31**	**0**	**15**	**16**	**0**	**20**

Crash Year	2016					
Location	**Total Crashes**	**Fatal Crashes**	**Injury Crashes**	**Property Damage Only Crashes**	**Killed Victims**	**Injured Victims**
Douglas Bl and Cavitt Stallman Rd	6	0	3	3	0	
Douglas Bl and Seeno Av	3	0	2	1	0	
Douglas Bl and Berg St	4	0	3	1	0	
Douglas Bl and Barton Rd	9	0	5	4	0	
Douglas Bl and Joe Rodgers Rd	2	0	0	2	0	
Douglas Bl and Dover Dr	1	0	0	1	0	
Eureka Rd and Greyhawk Dr	1	0	1	0	0	
Eureka Rd and Wellington Wy	2	0	0	2	0	
Eureka Rd east of Barton Rd	1	0	1	0	0	
Auburn Folsom Rd north of Eureka Rd	1	0	0	1	0	
Auburn Folsom Rd north of Fuller Dr	2	0	1	1	0	
Auburn Folsom Rd north of Oak Hill Dr/Beals Point	1	0	0	1	0	
Grand Total	**33**	**0**	**16**	**17**	**0**	

Crash Year	2017					
Location	**Total Crashes**	**Fatal Crashes**	**Injury Crashes**	**Property Damage Only Crashes**	**Killed Victims**	**Injured Victims**
Douglas Bl and Cavitt Stallman Rd	10	0	7	3	0	
Douglas Bl and Seeno Av	3	0	2	1	0	
Douglas Bl and Berg St	3	0	2	1	0	
Douglas Bl and Barton Rd	14	0	7	7	0	
Douglas Bl and Joe Rodgers Rd	1	0	1	0	0	
Douglas Bl and Dover Dr	2	0	1	1	0	
Auburn Folsom Rd north of Eureka Rd	2	0	1	1	0	
Auburn Folsom Rd north of Fuller Dr	3	0	0	3	0	
Auburn Folsom Rd north of Oak Hill Dr/Beals Point	1	0	1	0	0	
Grand Total	**39**	**0**	**22**	**17**	**0**	

Crash Year	2018					
Location	**Total Crashes**	**Fatal Crashes**	**Injury Crashes**	**Property Damage Only Crashes**	**Killed Victims**	**Injured Victims**
Douglas Bl and Cavitt Stallman Rd	2	0	1	1	0	
Douglas Bl and Seeno Av	5	0	3	2	0	
Douglas Bl and Berg St	8	1	1	6	1	
Douglas Bl and Barton Rd	5	0	1	4	0	
Douglas Bl and Joe Rodgers Rd	2	0	1	1	0	
Douglas Bl and Dover Dr	3	0	2	1	0	
Douglas Bl and Iris Pl	1	0	0	1	0	
Barton Rd south of Roseville Pkwy	1	0	1	0	0	
Eureka Rd east of Sierra College Bl	1	0	1	0	0	
Auburn Folsom Rd north of Eureka Rd	4	0	1	3	0	
Auburn Folsom Rd north of Fuller Dr	2	0	1	1	0	
Auburn Folsom Rd north of Oak Hill Dr/Beals Point	1	0	0	1	0	
Grand Total	**35**	**1**	**13**	**21**	**1**	

Crash Year	2019

Location	Total Crashes	Fatal Crashes	Injury Crashes	Property Damage Only Crashes	Killed Victims	Injured Victims
Douglas Bl and Cavitt Stallman Rd	9	0	3	6	0	
Douglas Bl and Seeno Av	2	0	2	0	0	
Douglas Bl and Berg St	4	0	0	4	0	
Douglas Bl and Barton Rd	17	0	8	9	0	
Douglas Bl and Dover Dr	1	0	1	0	0	
Roseville Pkwy west of Barton Rd	1	0	0	1	0	
Auburn Folsom Rd north of Eureka Rd	3	0	1	2	0	
Auburn Folsom Rd north of Fuller Dr	1	0	0	1	0	
Auburn Folsom Rd north of Oak Hill Dr/Beals Point	2	0	2	0	0	
Grand Total	**40**	**0**	**17**	**23**	**0**	

Crash Year	2020

Location	Total Crashes	Fatal Crashes	Injury Crashes	Property Damage Only Crashes	Killed Victims	Injured Victims
Douglas Bl and Cavitt Stallman Rd	10	0	6	4	0	
Douglas Bl and Seeno Av	3	0	2	1	0	
Douglas Bl and Berg St	2	0	1	1	0	
Douglas Bl and Barton Rd	14	0	7	7	0	
Douglas Bl and Joe Rodgers Rd	1	0	1	0	0	
Douglas Bl and Dover Dr	1	0	0	1	0	
Auburn Folsom Rd north of Eureka Rd	2	1	1	0	1	
Auburn Folsom Rd north of Fuller Dr	4	0	1	3	0	
Auburn Folsom Rd north of Oak Hill Dr/Beals Point	1	0	0	1	0	
Grand Total	**38**	**1**	**19**	**18**	**1**	

Crash Year	2021

Location	Total Crashes	Fatal Crashes	Injury Crashes	Property Damage Only Crashes	Killed Victims	Injured Victims
Douglas Bl and Cavitt Stallman Rd	6	0	1	5	0	1
Douglas Bl and Seeno Av	3	0	2	1	0	2
Douglas Bl and Berg St	2	0	1	1	0	3
Douglas Bl and Barton Rd	12	0	0	12	0	0
Douglas Bl and Joe Rodgers Rd	3	0	2	1	0	2
Douglas Bl and Dover Dr	1	0	0	1	0	0
Eureka Rd and Greyhawk Dr	1	0	1	0	0	1
Eureka Rd and Wellington Wy	1	0	0	1	0	0
Auburn Folsom Rd north of Fuller Dr	2	0	2	0	0	2
Grand Total	**31**	**0**	**9**	**22**	**0**	**11**

Crash Year	2022

Location	Total Crashes	Fatal Crashes	Injury Crashes	Property Damage Only Crashes	Killed Victims	Injured Victims
Douglas Bl and Cavitt Stallman Rd	6	0	2	4	0	2
Douglas Bl and Seeno Av	3	0	2	1	0	3
Douglas Bl and Berg St	4	0	1	3	0	2
Douglas Bl and Barton Rd	16	0	7	9	0	12
Douglas Bl and Joe Rodgers Rd	2	0	2	0	0	2
Douglas Bl and Dover Dr	1	0	0	1	0	0
Auburn Folsom Rd north of Eureka Rd	3	0	2	1	0	3
Auburn Folsom Rd north of Fuller Dr	2	0	0	2	0	0
Grand Total	**37**	**0**	**16**	**21**	**0**	**24**

Crash Year	2023					
Location	**Total Crashes**	**Fatal Crashes**	**Injury Crashes**	**Property Damage Only Crashes**	**Killed Victims**	**Injured Victims**
Douglas Bl and Cavitt Stallman Rd	4	0	0	4	0	
Douglas Bl and Seeno Av	3	0	1	2	0	
Douglas Bl and Berg St	5	1	2	2	1	
Douglas Bl and Barton Rd	13	1	5	7	1	
Douglas Bl and Joe Rodgers Rd	3	0	0	3	0	
Douglas Bl and Dover Dr	1	0	1	0	0	
Eureka Rd east of Sierra College Bl	1	0	0	1	0	
Eureka Rd and Wellington Wy	2	0	1	1	0	
Auburn Folsom Rd north of Eureka Rd	4	0	0	4	0	
Auburn Folsom Rd north of Oak Hill Dr/Beals Point	1	0	0	1	0	
Grand Total	**37**	**2**	**10**	**25**	**2**	

LETTER 46: CHERYL BERKEMA

Response to Comment 46-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 46-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 46-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 46-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 46-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 46-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 47

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Request for Sewer study Granite Bay
Date: Tuesday, March 19, 2024 10:34:45 AM
Attachments: Sewer Capacity Modeling Analysis TM 3-6 Final 2.25.11[1] (1).pdf

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, March 18, 2024 7:46 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Cheryl Berkema <cheryl.berkema@gmail.com>
Subject: Fwd: Request for Sewer study Granite Bay

Hello Kally,

Please note, I have not received a response from public works for the latest sewer reports/studies. The Consultant for the DEIR has access to the County so should be able to obtain the requested information for the DEIR feedback that was requested.

DEIR feedback:

47-1

Since the sewer report from 2011 for Granite Bay reported that there may be a sewer line size increase required in Granite Bay and that would have an impact to residents, the feasibility for the sewer line improvement being needed and the funding availability should be provided. The DEIR just states sewer is available which is not sufficient.

The DEIR should look at the most current sewer study which has been requested but not yet provided. Again, the DEIR Consultant has access to the county records working with Placer County.

Thank you. Please include my DEIR feedback on the administrative record.

Cheryl Berkema

---------- Forwarded message ---------
From: **Cheryl Berkema** <cheryl.berkema@gmail.com>
Date: Tue, Mar 12, 2024 at 2:16 PM
Subject: Request for Sewer study Granite Bay
To: <sewer@placer.ca.gov>

Hello Public Works,

I am looking for a copy of the most recent sewer study for Granite Bay SMD2.

The most recent sewer information I could find was a rate increase in 2019 and a

report from 2011 (attached).
https://www.placer.ca.gov/DocumentCenter/View/35019/Granite-Bay-Sewer-Public-Hearing-Notice?bidId=

Thank you for your assistance,

Cheryl Berkema

Brown AND Caldwell

201 North Civic Drive, Suite 115
Walnut Creek, California 94596
Tel: 925-937-9010
Fax: 925-937-9026

Technical Memorandum
FINAL

Prepared for: County of Placer – Department of Facility Services/Environmental Engineering Division

Project Title: SMD 3 Regional Sewer Project Design

Project No: 129738-001-003

Technical Memorandum No. 1-6

Subject: Hydraulic Model Analysis

Date: February 25, 2011

To: Heather Knutson, PE

From: Scott Duren, PE, Project Manager

Prepared by: Christopher M. Peters

REGISTERED PROFESSIONAL ENGINEER CHRISTOPHER M. PETERS 69669 Exp. 6/30/12 CIVIL STATE OF CALIFORNIA

Christopher Peters, Project Engineer
Engineer in Responsible Charge, CA License No. C 69669, Exp. 06/30/12

Erik Zalkin, Project Engineer
California License No. C 75392

Reviewed by: Pete Bellows, Vice President
California License No. C 34337

Table of Contents

List of Figures iii
List of Tables iv
1. Introduction 1
2. Flow Scenarios 1
3. Hydraulic Analysis 4
3.1 Deficiency Criteria 4
3.2 Modeling of Capacity Deficiencies 5
3.3 Model Results 5
3.3.1 Scenario 1 Summary: Current (2010) PWWF, SMD 2 6
3.3.2 Scenario 2 Summary: Current (2010) PWWF, SMD 2 and SMD 3 at MH I17-10 6
3.3.3 Scenario 3 Summary: Current (2010) PWWF, SMD 2 and SMD 3 at MH E14-48 6
3.3.4 Scenario 4 Summary: Ultimate Build-out PWWF, SMD 2 6
3.3.5 Scenario 5 Summary: Ultimate Build-out PWWF, SMD 2 and SMD 3 at MH I17-10 7
3.3.6 Scenario 6 Summary: Ultimate Build-out PWWF, SMD 2 and SMD 3 at MH E14-48 7
3.3.7 Scenario 7 Summary: Interim Build-out PWWF, SMD 2 and SMD 3 at MH I17-10 7
4. Conclusions 9
5. Future Model Updates 9
Attachment A: Hydraulic Profiles ..... A
Attachment B: Recommendations ..... B

List of Figures

Figure 2-1. Model Flow Projection Scenarios 3
Figure 3-1. Scenario 1 Pipe Deficiencies 11
Figure 3-2. Scenario 1 Pipe Upsizing 12
Figure 3-3. Scenario 2 Pipe Deficiencies 13
Figure 3-4. Scenario 2 Pipe Upsizing 14
Figure 3-5. Scenario 3 Pipe Deficiencies 15
Figure 3-6. Scenario 3 Pipe Upsizing 16
Figure 3-7. Scenario 4 Pipe Deficiencies 17
Figure 3-8. Scenario 4 Pipe Upsizing 18
Figure 3-9. Scenario 5 Pipe Deficiencies 19
Figure 3-10. Scenario 5 Pipe Upsizing 20
Figure 3-11. Scenario 6 Pipe Deficiencies 21

Figure 3-12. Scenario 6 Pipe Upsizing....22
Figure 3-13. Scenario 7A Pipe Deficiencies (10 percent)....23
Figure 3-14. Scenario 7B Pipe Deficiencies (15 percent)....24
Figure 3-15. Scenario 7A and 7B Pipe Upsizing....25

List of Tables

Table 2-1. Model Flow Scenarios....2
Table 3-1. Model Pipe Deficiency Criteria....4
Table 4-1. Model Pipe Deficiency Summary....9

1. Introduction

This Technical Memorandum (TM) 1-6 describes the hydraulic model analysis of the Sewer Maintenance District (SMD) 2 trunk sewers under the land use development and flow projection scenarios presented in TM 1-4 (Model Flows) and TM 1-5 (Hydraulic Model Development). The purpose of this analysis is to simulate the effects of peak wet weather flows (PWWF) on the existing system, determine which land use development scenarios may cause capacity deficiencies in the SMD 2 trunk sewer system, and identify where those problems would be expected to occur.

Once capacity deficiencies were identified, the model was used to identify recommendations to resolve them. Recommendations discussed in this TM include upsizing specific pipe reaches and changing the future SMD 3-to-SMD 2 connection point.

This is a planning level evaluation; construction considerations such as geotechnical conditions and utility conflicts have not been taken into consideration at this time. Further geotechnical and utility investigations will be conducted and presented in the project preliminary design. Preliminary and final design recommendations should be verified with the hydraulic model.

2. Flow Scenarios

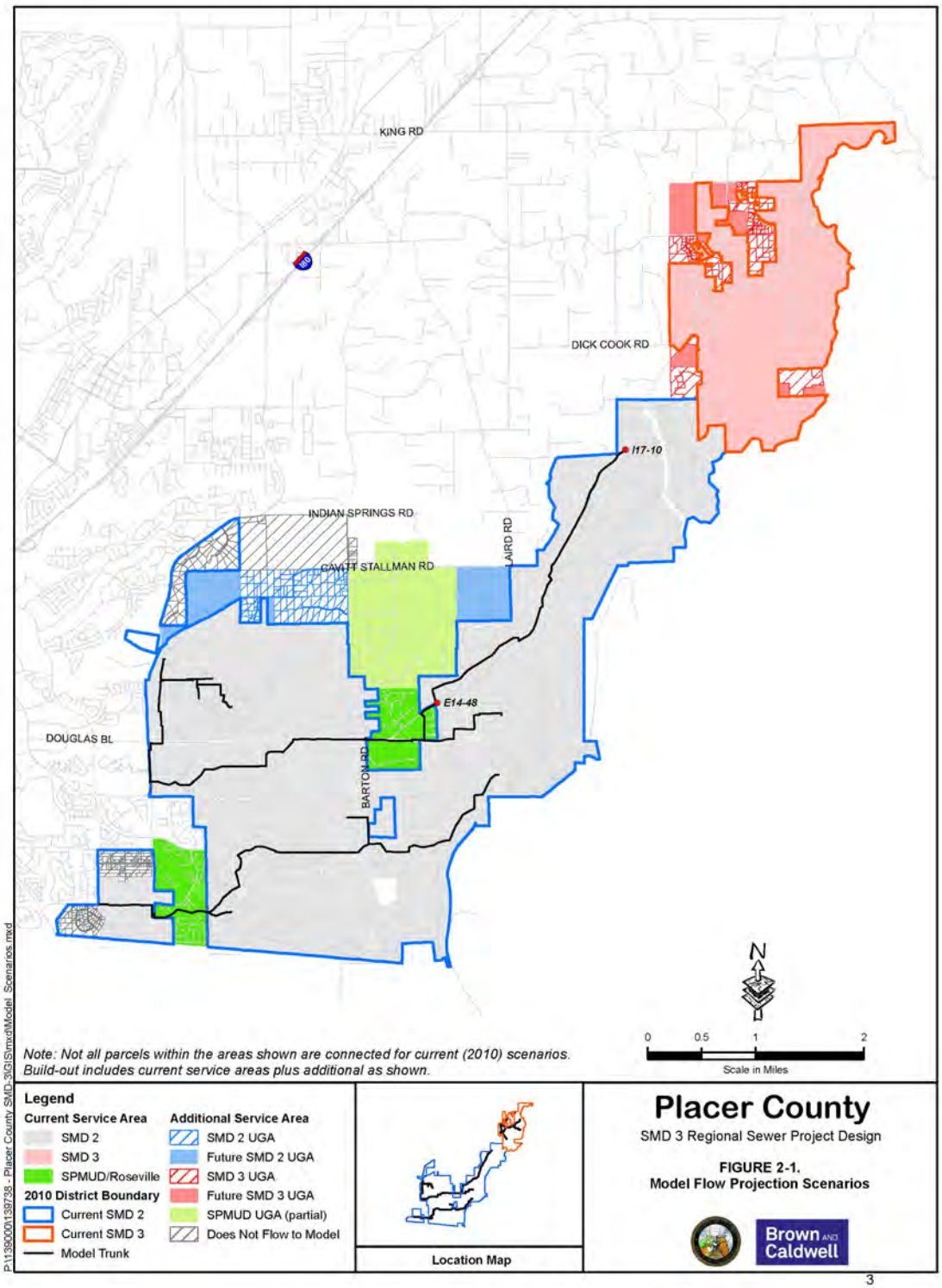
The hydraulic modeling analysis was performed for seven distinct flow projection scenarios as directed by Placer County (County). The scenarios were developed to simulate the impact of current (2010) and build-out PWWFs on the existing trunk sewer system.

Flows from SMD 2 only and from SMD 2 and SMD 3 were modeled for the Current (2010), Ultimate Build-out and Interim Scenarios to show the impact that SMD 3 development would have above and beyond the impact of projected SMD 2 development. The scenarios are described in Table 2-1. Geographical areas included in each scenario are shown on Figure 2-1.

Table 2-1. Model Flow Scenarios

Scenario	Description	Service Area[1]
1. Current (2010) PWWF, SMD 2	Connected parcels within the current (2010) SMD 2 boundary and adjacent contributing areas (SPMUD).	SMD 2 and parts of Rodgersdale and Roseville.
2. Current (2010) PWWF, SMD 2 and SMD 3 (Connection Point at MH I17-10)	Same as Scenario 1 plus connected parcels within the current (2010) SMD 3 boundary flowing into SMD 2 MH I17-10.	Same as Scenario 1 plus SMD 3.
3. Current (2010) PWWF, SMD 2 and SMD 3 (Connection Point at MH E14-48)	Same as Scenario 1 plus connected parcels within the current (2010) SMD 3 boundary flowing into SMD 2 MH E14-48.	Same as Scenario 1 plus SMD 3.
4. Ultimate Build-out PWWF, SMD 2	Same as Scenario 1 plus all parcels within the extended future SMD 2 boundary and adjacent contributing areas (SPMUD) that could potentially develop and become connected, as identified by the County.	Same as Scenario 1 plus SMD 2 UGAs.
5. Ultimate Build-out PWWF, SMD 2 and SMD 3 (Connection Point at MH I17-10)	Same as Scenario 4 plus additional parcels within the future SMD 3 boundary that could potentially develop and become connected, as identified by the County flowing into MH I17-10.	Same as Scenario 4 plus SMD 3 UGAs.
6. Ultimate Build-out PWWF, SMD 2 and SMD 3 (Connection Point at MH E14-48)	Same as Scenario 4 plus additional parcels within the future SMD 3 boundary that could potentially develop and become connected, as identified by the County flowing into MH E14-48.	Same as Scenario 4 plus SMD 3 UGAs.
7. Interim Build-out PWWF, SMD 2 and SMD 3 (Connection Point at MH I17-10)	Future scenario at some time between Scenarios 2 and 5 with the SMD 3 connection point at MH I17-10. Predicted PWWFs trigger the need to construct the second phase of the SMD 3 project.	Same as Scenario 2 plus approximately 15 percent of the probable development within SMD 2 and SMD 3 UGAs and additional SPMUD area north of Rodgersdale.[2] SMD 3 PWWF of 0.77 mgd (798 EDU; ADWF of 0.16 mgd).

[1] *As shown on Figure 2-1.*
[2] *All areas are assumed to develop at the same rate.*
[3] *PWWF=Peak Wet Weather Flow; SMD=Sewer Maintenance District; SPMUD=South Placer Municipal Utility District; MH=Manhole*


KING RD
DICK COOK RD
I17-10
INDIAN SPRINGS RD
GAMETT STALLMAN RD
LAIRD RD
E14-48
DOUGLAS BL
BARTON RD
N
0 0.5 1 2
Scale in Miles
Note: Not all parcels within the areas shown are connected for current (2010) scenarios.
Build-out includes current service areas plus additional as shown.
Legend
Current Service Area
SMD 2
SMD 3
SPMUD/Roseville
2010 District Boundary
Current SMD 2
Current SMD 3
Model Trunk
Additional Service Area
SMD 2 UGA
Future SMD 2 UGA
SMD 3 UGA
Future SMD 3 UGA
SPMUD UGA (partial)
Does Not Flow to Model
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 2-1.
Model Flow Projection Scenarios
Brown AND Caldwell
P:\139000\138738 - Placer County SMD-3\GIS\mxd\Model_Scenarios.mxd

3. Hydraulic Analysis

The seven scenarios were modeled using the 10-year, 24-hour design storm described in TM 1-5 (Model Development). Also, as described in TM 1-5, there is one pump station included in the model (PS26). This variable speed pump station pumps flow from the south trunk at MH A9-01 to the extension of the north trunk in the City of Roseville, downstream of the last modeled manhole (C9-M5). The maximum flow diverted is 360 gallons per minute (gpm).

The capacity analysis was an iterative process. First, existing trunk sewer pipes with hydraulic capacity deficiencies were identified by running the model without upsizing any pipes. If capacity problems were identified, the pipes in question were upsized to eliminate the deficiency for the current model run, and then the model was re-run. Several runs for each scenario were carried out to eliminate all of the deficiencies and identify the ultimate pipe diameters required to pass all of the flow without exceeding the County's deficiency criteria.

3.1 Deficiency Criteria

The County identified two deficiency criteria for this analysis. First, for current (2010) and interim scenarios, the criteria defines a pipeline to be hydraulically deficient when the hydraulic grade line (HGL) is less than or equal to five feet from the ground surface (rim) elevation at a manhole (five feet of freeboard), yet must be surcharged equal to or greater than one foot above the pipe crown. Second, for all other build-out scenarios, the criteria defines a pipeline to be hydraulically deficient when the HGL is less than or equal to eight feet from the ground surface (rim) elevation at a manhole (eight feet of freeboard), yet must be surcharged equal to or greater than one foot above the pipe crown. Freeboard distance is measured to the nearest 1/100th of a foot. The criteria was developed in this manner to prevent unnecessary capacity upgrades in shallow pipes unless the pipe was under capacity and surcharged equal to or greater than one foot. The deficiency criteria for this project is summarized in Table 3-1.

The criteria for current (2010) and interim scenarios is less conservative than build-out because current flows are based on measured data and are more accurately defined. Future flows are more difficult to predict and are subject to more variability.

Table 3-1. Model Pipe Deficiency Criteria

Scenario	Deficiency Criteria
1. Current (2010) PWWF, SMD 2	Freeboard ≤ 5 feet; Surcharge ≥ 1 foot
2. Current (2010) PWWF, SMD 2 and SMD 3 (Connection Point at MH I17-10)	Freeboard ≤ 5 feet; Surcharge ≥ 1 foot
3. Current (2010) PWWF, SMD 2 and SMD 3 (Connection Point at MH E14-48)	Freeboard ≤ 5 feet; Surcharge ≥ 1 foot
4. Ultimate Build-out PWWF, SMD 2	Freeboard ≤ 8 feet; Surcharge ≥ 1 foot
5. Ultimate Build-out PWWF, SMD 2 and SMD 3 (Connection Point at MH I17-10)	Freeboard ≤ 8 feet; Surcharge ≥ 1 foot
6. Ultimate Build-out PWWF, SMD 2 and SMD 3 (Connection Point at MH E14-48)	Freeboard ≤ 8 feet; Surcharge ≥ 1 foot
7. Interim Build-out PWWF, SMD 2 and SMD 3 (Connection Point at MH I17-10)	Freeboard ≤ 5 feet; Surcharge ≥ 1 foot

3.2 Modeling of Capacity Deficiencies

Pipes can become surcharged and lead to sanitary sewer overflows (SSOs) at unsealed manholes when the flow exceeds the pipe capacity. Two kinds of surcharge are identified in H2OMap Sewer model output: throttle surcharge and backwater surcharge.

Throttle surcharge occurs when the model flow exceeds the hydraulic capacity of an individual pipe as calculated by Manning's equation. The model output profile (as shown in Attachment A) shows the water surface depth within the pipe (blue) corresponding to the crown of the pipe (black), and the HGL (red) above the crown of the pipe. The water surface depth is always shown within the pipe, while the HGL may be above water surface depth if the pipe is under pressure or backwatered. The HGL slopes up from downstream to upstream at a steeper slope than the pipe slope indicating the pipe is flowing under pressure. The water surface level must rise in the upstream manhole to match the HGL to allow the modeled flow to pass through the pipe. Under-capacity pipes must be upsized and/or have their gradients increased to eliminate the deficiency.

Backwater surcharge occurs when the HGL is above the crown of the pipe because of a downstream capacity deficiency. If the upstream section has sufficient capacity, the profile water surface level is shown to lie between the pipe crown and invert, but the HGL is shown above the water surface level, and often above the crown as well. Backwater surcharge is remedied by eliminating the downstream throttle surcharge capacity deficiency.

3.3 Model Results

This section presents the results for the seven model scenarios described in Section 2. The capacity analysis was performed for the three major trunk sewer network components: the North Trunk; the South Trunk; and the West Trunk as illustrated on Figures 3-1 through 3-15. The legend on the subsequent Pipe Deficiency figures shows pipes as "Deficient with less than allowable freeboard" colored red; "Backwatered with less than allowable freeboard" colored orange; "Throttled with more than allowable freeboard" colored yellow; "Backwatered with more than allowable freeboard" colored green. Pipes with no surcharging (flow is contained within the pipe) are colored gray.

In Attachment A, each trunk was divided into multiple segments to show the pipe profiles at an appropriate scale for ease of viewing. Each pipe profile has a legend illustrating the specific profile components: pipe invert (horizontal black); pipe crown (horizontal black); ground surface (green); manholes (vertical black); and HGL (red). HGLs at or above the pipe crown indicate throttle surcharge or backwater conditions. HGLs at the ground surface indicate a potential SSO location at an unsealed manhole. HGLs above the ground surface can only occur when manhole lids are sealed in the model (assumed bolted shut). Manholes at the dual siphon were assumed to be sealed.

Model results shown on Attachment A pages 15, 25, 26, 27, 34, 35, 39 and 40 represent a situation where the HGL is rising positively while the ground surface is sloping negatively. When this happens at unsealed manholes in H2OMap Sewer, the HGL is shown as a horizontal, then vertical line connecting the HGL to the ground surface at the next upstream manhole. In reality, the HGL would follow the ground surface, indicating potential SSOs where the HGL meets the ground surface. This illustration in the H2OMap Sewer model is simply a unique way of representing this condition.

Capacity problems that cause surcharging which exceeds the deficiency criteria are identified in each scenario summary. Deficiencies were addressed by upsizing deficient pipes to convey the flow for the specific scenario only (parallel relief sewers were not considered). Due to extremely steep topography in between some deficient areas, pipe sizes may decrease while traveling downstream. This should be investigated further during preliminary design. As a conservative assumption, no adjustments were made to improve pipe gradients (including flat and adverse slopes). Experience has shown that improving the pipe

gradient is often not possible due to utility conflicts or other reasons. This should be investigated further during preliminary design. Pipe segments requiring upsizing are also identified for each scenario in Figures 3-1 through 3-15. Pipes are represented by their pipe ID in the figures and the summaries below. The pipe ID is the same number as the pipe segment's upstream manhole number. Figures illustrating the hydraulic profiles (with location legend) and a table with recommended pipe size improvements are presented in Attachments A and B, respectively.

3.3.1 Scenario 1 Summary: Current (2010) PWWF, SMD 2

- **North Trunk** – Isolated throttle surcharge and backwater conditions with greater than five feet of freeboard downstream of pipe H16-02. One pipe segment (Pipe ID: H16-02) with throttle surcharge causing backwater conditions with less than five feet of freeboard. 362 linear feet (lf) of 6-inch diameter pipe (Pipe ID: H16-02) requires upsize to 10-inches.
- **West Trunk** - Isolated throttle surcharge conditions with greater than five feet of freeboard. No improvements required.
- **South Trunk** – Isolated throttle surcharge and backwater conditions with greater than five feet of freeboard. No improvements required.

Scenario 1 is presented on Figures 3-1 and 3-2 and Attachment A pages 1 through 10.

3.3.2 Scenario 2 Summary: Current (2010) PWWF, SMD 2 and SMD 3 at MH I17-10

- **North Trunk** – For this scenario a hydrograph with a PWWF of 0.58 mgd (611 EDU; ADWF of 0.11mgd) is input at MH I17-10 to represent SMD 3 flows that are conveyed to SMD 2. Isolated throttle surcharge and backwater conditions with greater than five feet of freeboard downstream of pipe G16-29. Over 6,500 lf of throttle surcharge and backwater conditions with less than five feet of freeboard in areas of existing 6-inch and 8-inch diameter pipe downstream of pipe I17-10. 6,584 lf of 6-inch and 8-inch diameter pipe requires upsize to 10-inches from pipe I17-10 to G16-29.
- **West Trunk** - Same conditions as Scenario 1. No improvements required.
- **South Trunk** – Same conditions as Scenario 1. No improvements required.

Scenario 2 is presented on Figures 3-3 and 3-4 and Attachment A pages 11 through 15.

3.3.3 Scenario 3 Summary: Current (2010) PWWF, SMD 2 and SMD 3 at MH E14-48

- **North Trunk** – For this scenario a hydrograph with a PWWF of 0.58 mgd (611 EDU; ADWF of 0.11mgd) is input at MH E14-48 to represent SMD 3 flows that are conveyed to SMD 2. Isolated throttle surcharge and backwater conditions with greater than five feet of freeboard downstream of pipe H16-02. One pipe segment (H16-02) with throttle surcharge causing backwater conditions with less than five feet of freeboard. 362 lf of 6-inch diameter pipe (H16-02) requires upsize to 10-inches.
- **West Trunk** – Same conditions as Scenario 1 and 2. No improvements required.
- **South Trunk** – Same conditions as Scenario 1 and 2. No improvements required.

Scenario 3 is presented on Figures 3-5 and 3-6 and Attachment A pages 16 through 20.

3.3.4 Scenario 4 Summary: Ultimate Build-out PWWF, SMD 2

- **North Trunk** – Isolated throttle surcharge and backwater conditions with greater than eight feet of freeboard downstream of pipe G16-29. Over 4,000 lf of throttle surcharge and backwater conditions with less than eight feet of freeboard in areas of existing 6-inch and 8-inch diameter pipe downstream of pipe I17-10. 1,841 lf of 6-inch and 8-inch diameter pipe requires upsize to 8- and 10-inches from pipe H16-02 to G16-29.
- **West Trunk** - Significant throttle surcharge conditions throughout the trunk with greater than eight feet of freeboard. Over 9,400 lf of throttle surcharge and backwater conditions with less than eight feet of

freeboard. 8,836 lf of 10-inch to 15-inch diameter pipe requires upsize to 15- and 18-inches. This includes upsizing downstream pipe that does not meet the deficiency criteria in order to lower the HGL enough to prevent further deficiencies upstream.

- **South Trunk** – Significant throttle surcharge conditions throughout the trunk with greater than eight feet of freeboard. Over 5,500 lf of throttle surcharge and backwater conditions with less than eight feet of freeboard downstream of pipe B11-16. 4,415 lf of 15-inch to 18-inch diameter pipe requires upsize to 18- and 21-inches from pipe A10-07 to pipe A9-11. This includes upsizing downstream pipe that does not meet the deficiency criteria in order to lower the HGL enough to prevent further deficiencies upstream.

Scenario 4 is presented on Figures 3-7 and 3-8 and Attachment A pages 21 through 30.

3.3.5 Scenario 5 Summary: Ultimate Build-out PWWF, SMD 2 and SMD 3 at MH I17-10

- **North Trunk** – For this scenario a hydrograph with a PWWF of 1.84 mgd (1,850 EDU; ADWF of 0.41mgd) is input at MH I17-10 to represent SMD 3 flows that are conveyed to SMD 2. Isolated throttle surcharge and backwater conditions with greater than eight feet of freeboard throughout the trunk. Over 19,000 lf of throttle surcharge and backwater conditions with less than eight feet of freeboard downstream of pipe I17-10. 27,793 lf of pipe from pipe I17-10 to pipe C10-04 requires upsize to 12- to 21-inches. This includes upsizing downstream pipe that does not meet the deficiency criteria in order to lower the HGL enough to prevent further deficiencies upstream.
- **West Trunk** - Same conditions and recommendations as Scenario 4.
- **South Trunk** – Same conditions and recommendations as Scenario 4.

Scenario 5 is presented on Figures 3-9 and 3-10 and Attachment A pages 31 through 35.

3.3.6 Scenario 6 Summary: Ultimate Build-out PWWF, SMD 2 and SMD 3 at MH E14-48

- **North Trunk** – For this scenario a hydrograph with a PWWF of 1.84 mgd (1,850 EDU; ADWF of 0.41mgd) is input at MH E14-48 to represent SMD 3 flows that are conveyed to SMD 2. Between pipe E14-48 and C10-04, pipe flows, deficiencies and recommendations are essentially the same as Scenario 5 with 10,382 lf of 15- and 18-inch diameter pipe requiring upsize to 18- and 21-inches. Upstream of E14-48, pipe flows, deficiencies and recommendations are essentially the same as Scenario 4 with 1,841 lf of 6-inch and 8-inch diameter pipe between pipe H16-02 and E14-48 requiring upsize to 8- and 10-inches.
- **West Trunk** - Same conditions and recommendations as Scenario 4 and 5.
- **South Trunk** – Same conditions and recommendations as Scenario 4 and 5.

Scenario 6 is presented on Figures 3-11 and 3-12 and Attachment A pages 36 through 40.

3.3.7 Scenario 7 Summary: Interim Build-out PWWF, SMD 2 and SMD 3 at MH I17-10

Scenario 7 was developed through an iterative process using the hydraulic model. Current PWWF for SMD 3 was connected to the SMD 2 system at MH I17-10, and all pipe segments that were identified as having deficient capacity were upsized to meet the ultimate build-out capacity for SMD 2 and SMD 3 flows. Growth in both SMD 2 and SMD 3 was simulated by gradually increasing the percentage of connected parcels expected in future development, resulting in proportionate increases in the PWWF. The percentage increase in connected area was applied across the sewersheds for both SMD 2 and SMD 3 until additional capacity improvements were required in the SMD 2 trunk sewers upstream of MH E14-48. When between 10 and 15 percent of the connections expected between current and build-out scenarios for both the SMD 2 and SMD 3 sewersheds had occurred, additional deficiencies were detected. The 15 percent scenario was defined as the interim scenario. Flows for SMD 3 in this scenario are represented by a hydrograph with a PWWF of 0.77 mgd (798 EDU; ADWF of 0.16 mgd).

The growth represented by the interim scenario was quantified by EDUs and compared to the actual observed growth in EDUs per year in SMD 3 over the past 10 years. Based on that comparison, the interim PWWFs would be expected to occur in approximately 10 years.

Scenario 7 is presented on Figures 3-13 through 3-15 and Attachment A pages 41 and 42. The figures and attachments illustrate the iterative process incurred to identify the specific development level at 15 percent between current (2010) and build-out conditions. Ten percent and 25 percent development levels were also investigated, as shown on Attachment A pages 43 and 44, respectively.

4. Conclusions

Table 4-1 summarizes the amount of pipe requiring upsizing to facilitate flow projections from each model scenario. For the build-out SMD 2 and SMD 3 condition, Scenario 5 requires over twice the amount of pipe upsizing; however, a longer force main would be required for Scenario 6 to transport the SMD 3 flow to MH E14-48.

Table 4-1. Model Pipe Deficiency Summary

Scenario	Pipe Requiring Upsize (lf)		
	North Trunk	West Trunk	South Trunk
1. Current (2010) PWWF, SMD 2	362	0	0
2. Current (2010) PWWF, SMD 2 and SMD 3 (Connection Point at MH I17-10)	6,584	0	0
3. Current (2010) PWWF, SMD 2 and SMD 3 (Connection Point at MH E14-48)	362	0	0
4. Ultimate Build-out PWWF, SMD 2	1,841	8,836	4,415
5. Ultimate Build-out PWWF, SMD 2 and SMD 3 (Connection Point at MH I17-10)	27,793	8,836	4,415
6. Ultimate Build-out PWWF, SMD 2 and SMD 3 (Connection Point at MH E14-48)	12,223	8,836	4,415
7. Interim Build-out PWWF, SMD 2 and SMD 3 (Connection Point at MH I17-10)	6,584	N/A	N/A

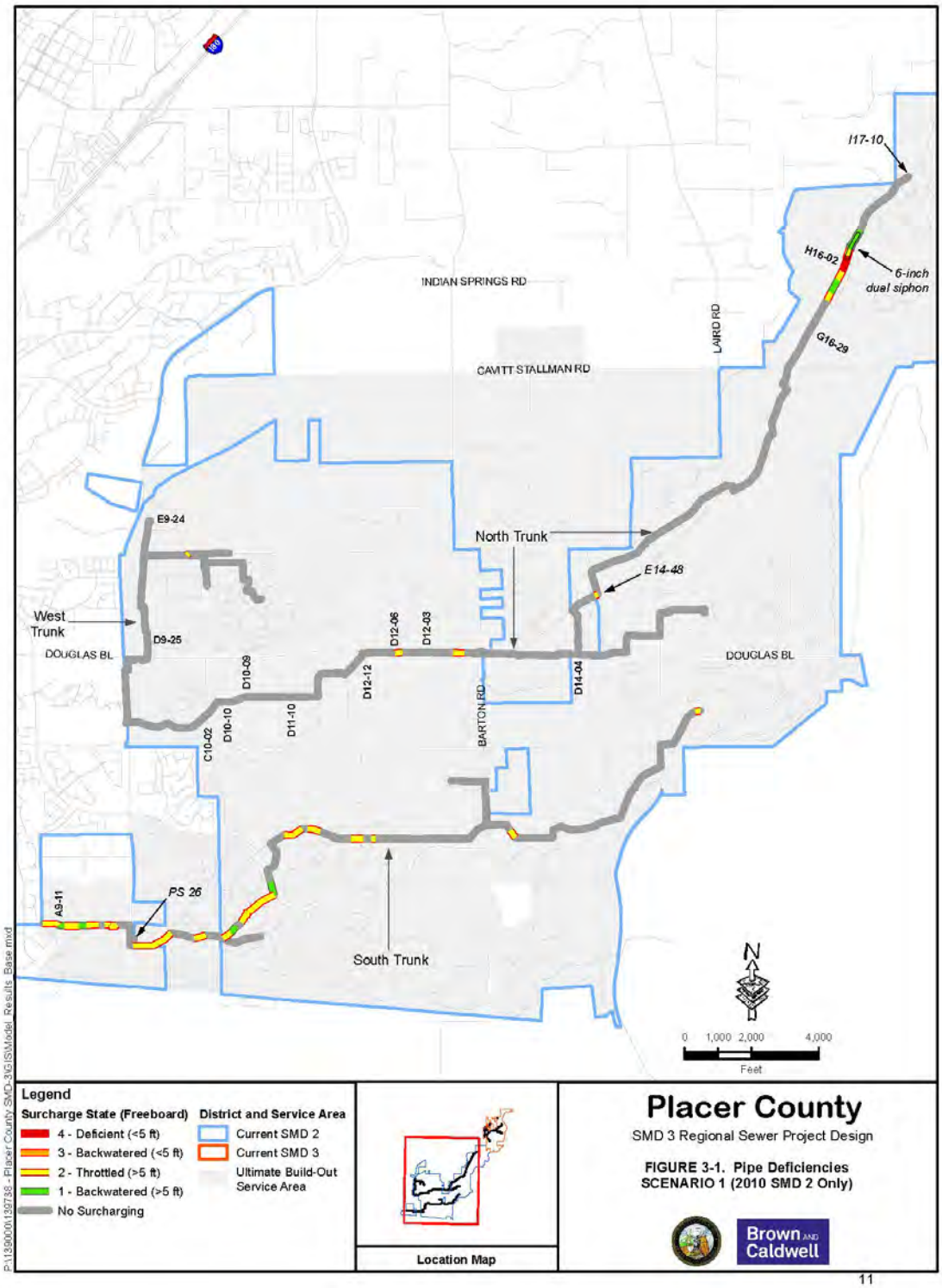
The results of the capacity analysis for all of the scenarios presented in this TM will be used to analyze options for phasing the construction of the SMD 3 Regional Sewer Project. A subsequent Phasing and Cost Comparison TM will analyze and compare the life-cycle costs of various phasing options between two pipeline alignment alternatives for conveying wastewater from SMD 3 into the SMD 2 trunk sewer system. The first alignment alternative will consist of a pressurized force main from the SMD 3 wastewater treatment plant (WWTP) to manhole I17-10, with upsizing of existing SMD 2 trunk sewers to meet projected capacity requirements. The second alignment alternative will continue the pressurized force main to manhole E14-48, with upsizing of existing SMD 2 trunk sewers as necessary to meet projected capacity requirements. A preferred alignment and recommended initial construction phase for the SMD 3 Regional Sewer Project will be presented and used to develop a preliminary design report for the project.

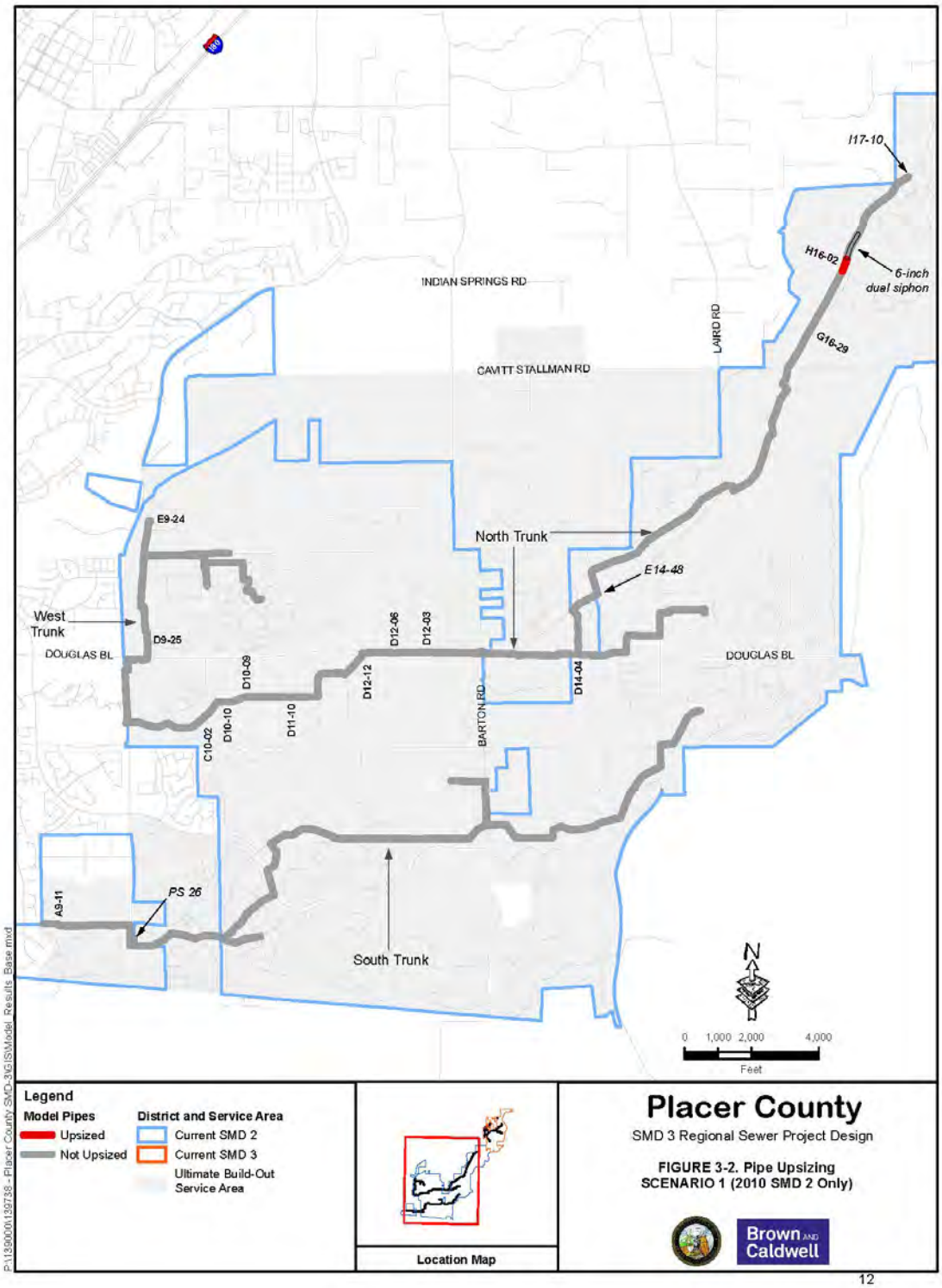
5. Future Model Updates

In the future, the County may desire to perform periodic updates to the model as new pipe network, land use or flow data become available. The steps outlined in this series of technical memoranda provide a framework for performing these updates. As a first step, the County should develop a regular dry and wet weather flow monitoring plan for these areas. Flow monitors can be deployed during each wet weather season and periodic dry weather seasons. For consistency and comparative purposes, flow monitoring sites should be located in the same areas as the current (2010) flow monitoring program. Some of the duplicate sites that were near each other (4/5 and 6/7) could be eliminated to save costs. For this project, monitored storm events were significantly smaller than the design event. It would be helpful to capture and calibrate to several larger storm events to compare actual system flows to the design storm under a variety of

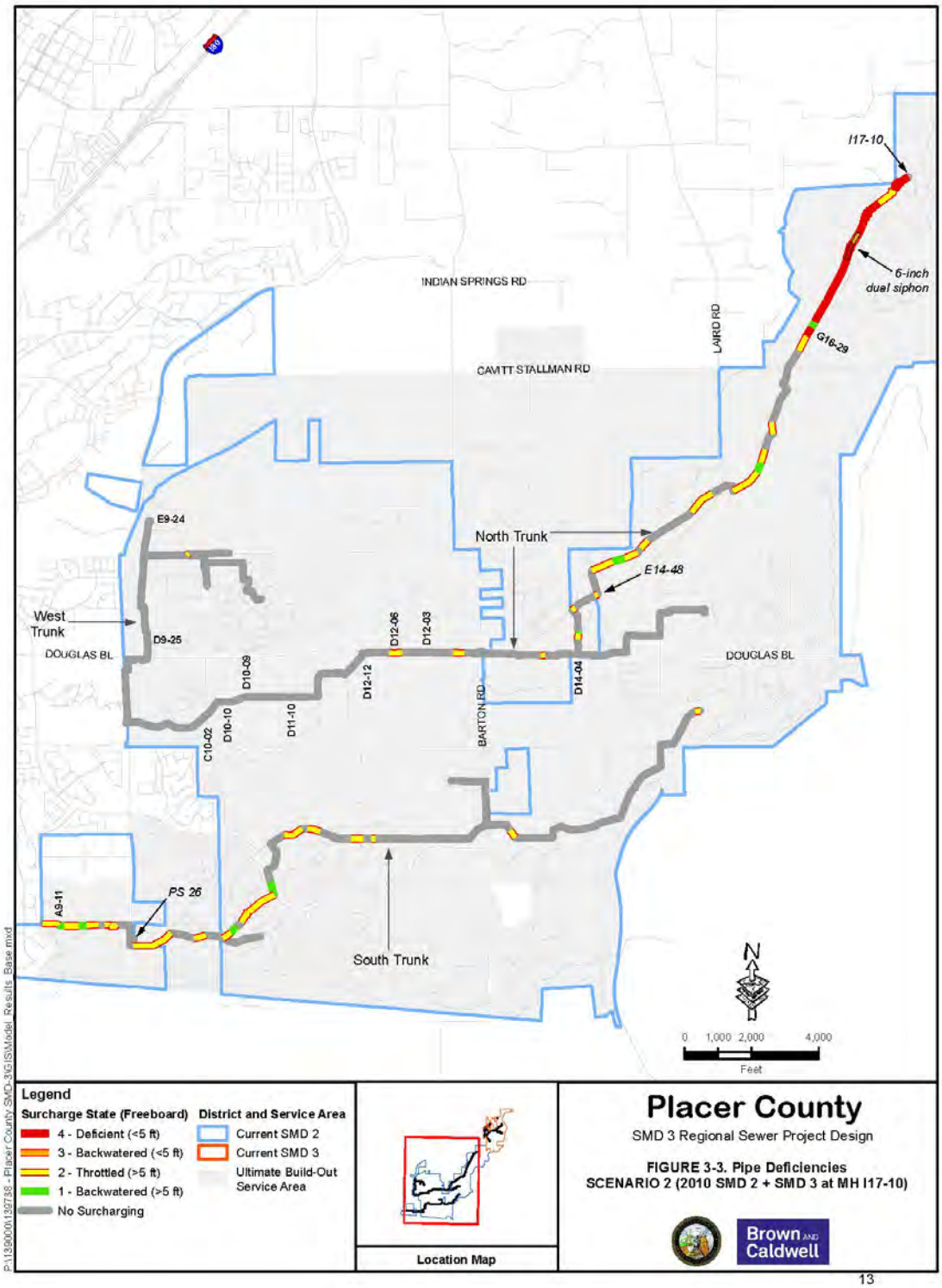


conditions. Over a period of years, the County could develop a significant collection of results and identify if current RDI/I parameters are appropriate under other storm scenarios.

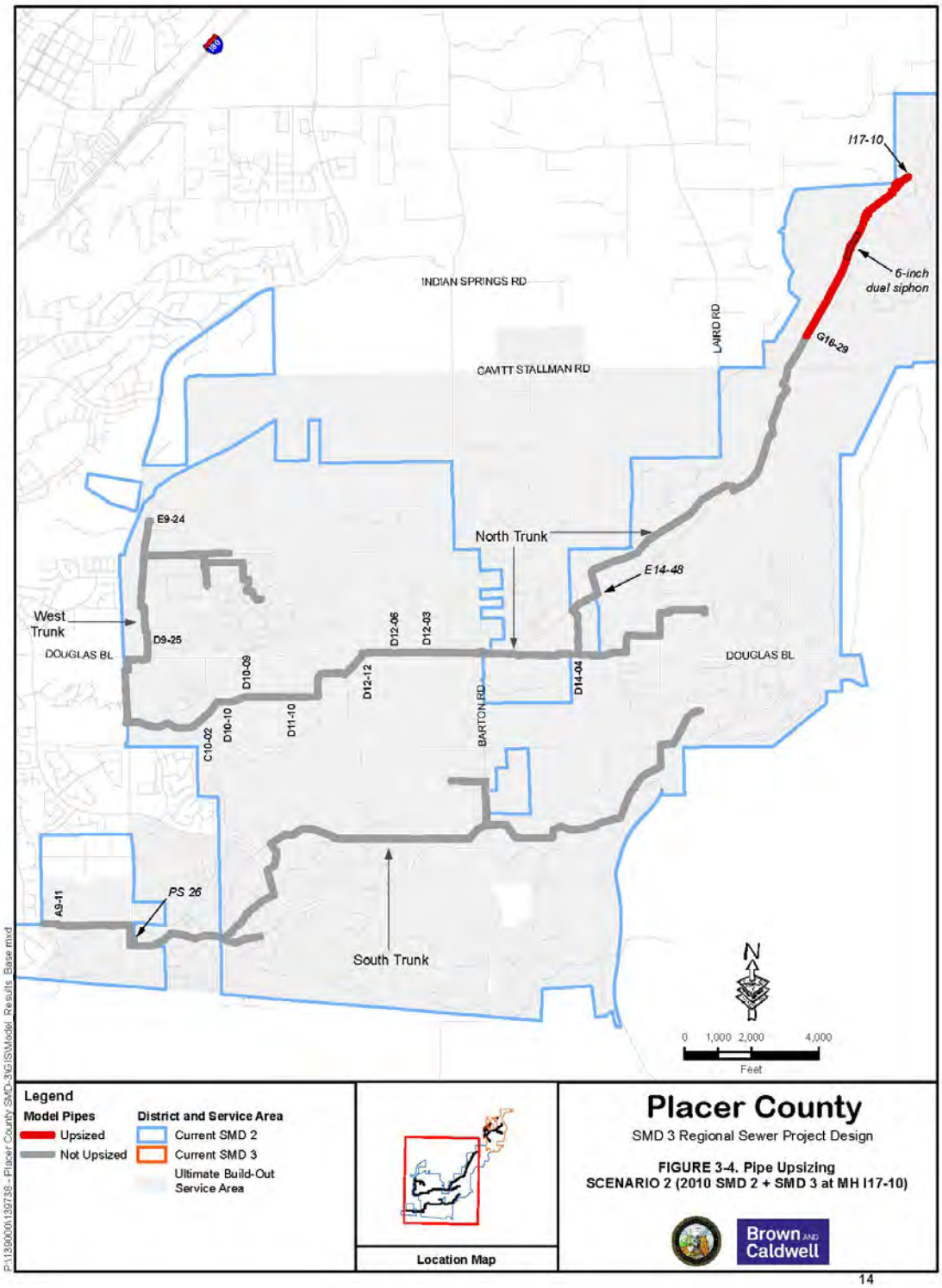

I17-10
H16-02
6-inch dual siphon
G16-29
INDIAN SPRINGS RD
LAIRD RD
CAVITT STALLMAN RD
E9-24
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D12-06
D12-03
D10-09
D12-12
D14-04
DOUGLAS BL
BARTON RD
C10-02
D10-10
D11-10
A9-11
PS 26
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Surcharge State (Freeboard)
4 - Deficient (<5 ft)
3 - Backwatered (<5 ft)
2 - Throttled (>5 ft)
1 - Backwatered (>5 ft)
No Surcharging
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-1. Pipe Deficiencies
SCENARIO 1 (2010 SMD 2 Only)
Brown AND Caldwell
P:\139000\139736 - Placer County SMD-3\GIS\Model Results Base.mxd
11

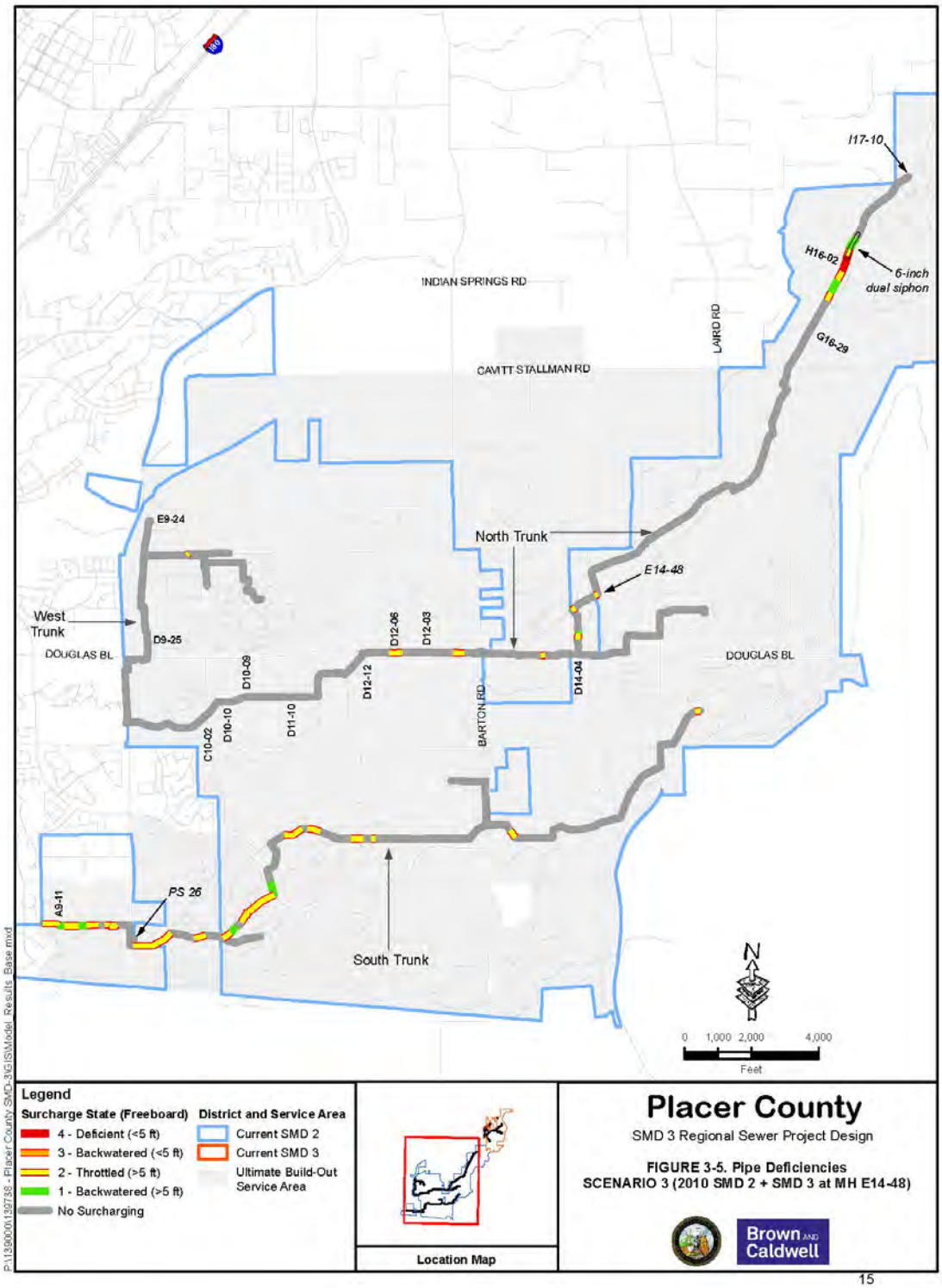

I17-10
H16-02
6-inch dual siphon
INDIAN SPRINGS RD
LARD RD
G16-29
CAVITT STALLMAN RD
E9-24
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D12-06
D12-03
D10-09
D12-12
D14-04
DOUGLAS BL
BARTON RD
C10-02
D10-10
D11-10
A9-11
PS 26
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Model Pipes
Upsized
Not Upsized
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-2. Pipe Upsizing
SCENARIO 1 (2010 SMD 2 Only)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd

12

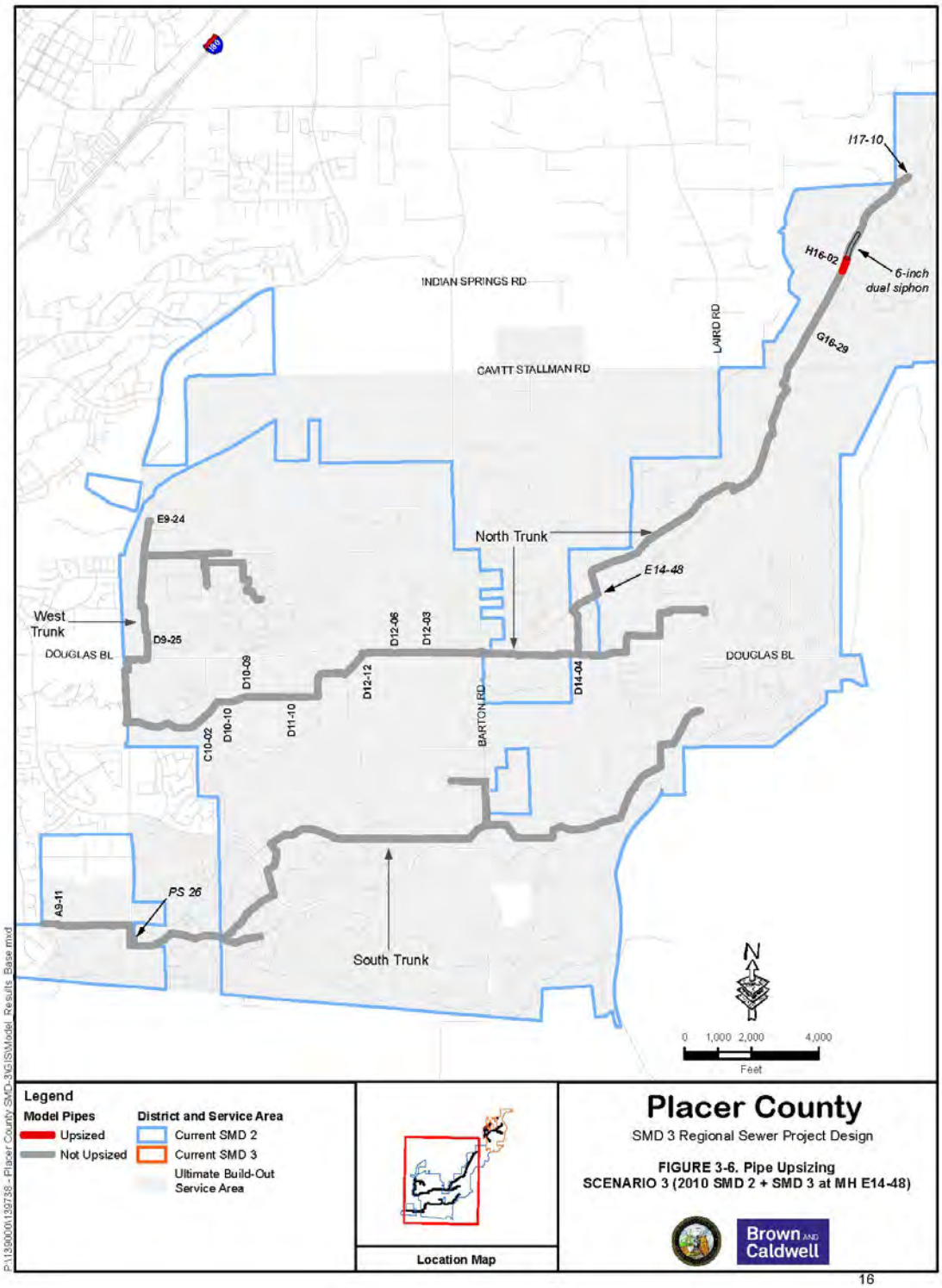

I17-10
6-inch dual siphon
G16-29
INDIAN SPRINGS RD
CAVITT STALLMAN RD
LAIRD RD
E9-24
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D12-06
D12-03
D10-09
D12-12
D14-04
BARTON RD
C10-02
D10-10
D11-10
AS-11
PS 26
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Surcharge State (Freeboard)
4 - Deficient (<5 ft)
3 - Backwatered (<5 ft)
2 - Throttled (>5 ft)
1 - Backwatered (>5 ft)
No Surcharging
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-3. Pipe Deficiencies
SCENARIO 2 (2010 SMD 2 + SMD 3 at MH I17-10)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd

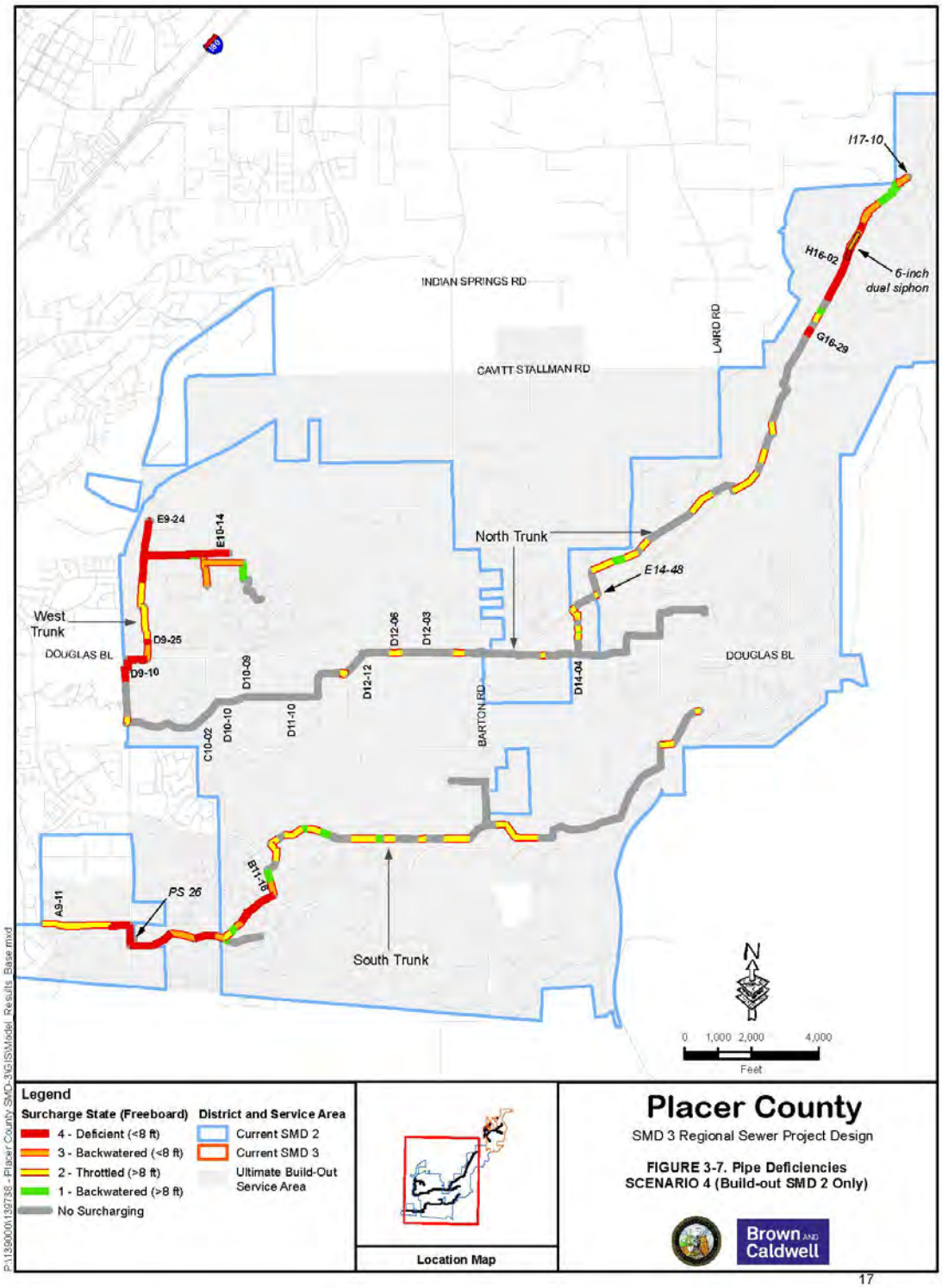
13

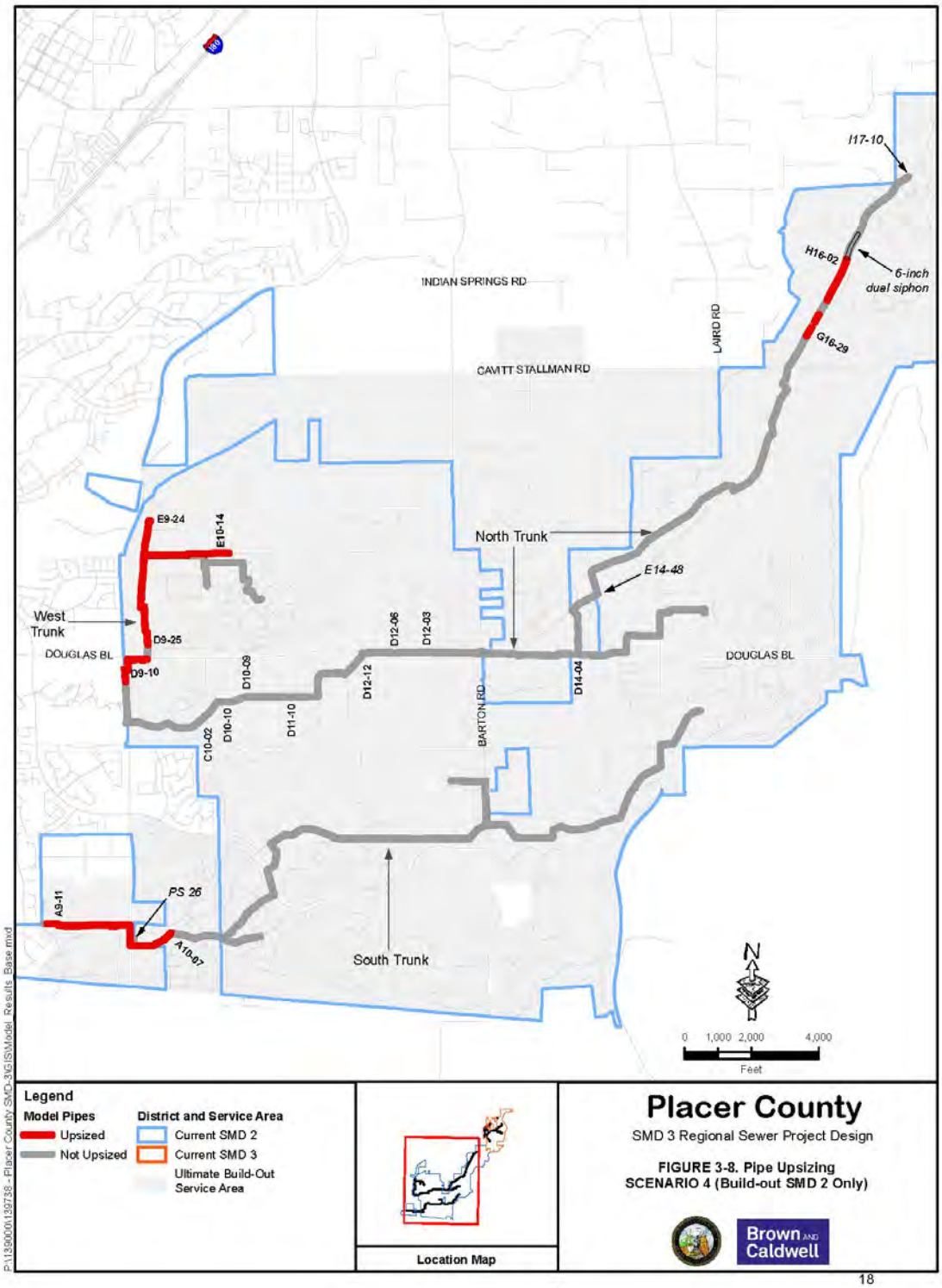

I17-10
6-inch dual siphon
G16-29
INDIAN SPRINGS RD
CAVITT STALLMAN RD
LAIRD RD
E9-24
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D12-06
D12-03
D10-09
D12-12
D14-04
BARTON RD
C10-02
D10-10
D11-10
A9-11
PS 26
South Trunk
0 1,000 2,000 4,000
Feet
Legend
Model Pipes
Upsized
Not Upsized
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-4. Pipe Upsizing
SCENARIO 2 (2010 SMD 2 + SMD 3 at MH I17-10)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd
14


I17-10
H16-02
6-inch dual siphon
G16-29
INDIAN SPRINGS RD
LAIRD RD
CAVITT STALLMAN RD
E9-24
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D12-06
D12-03
D10-09
D12-12
D14-04
BARTON RD
C10-02
D10-10
D11-10
AS-11
PS 26
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Surcharge State (Freeboard)
4 - Deficient (<5 ft)
3 - Backwatered (<5 ft)
2 - Throttled (>5 ft)
1 - Backwatered (>5 ft)
No Surcharging
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-5. Pipe Deficiencies
SCENARIO 3 (2010 SMD 2 + SMD 3 at MH E14-48)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd

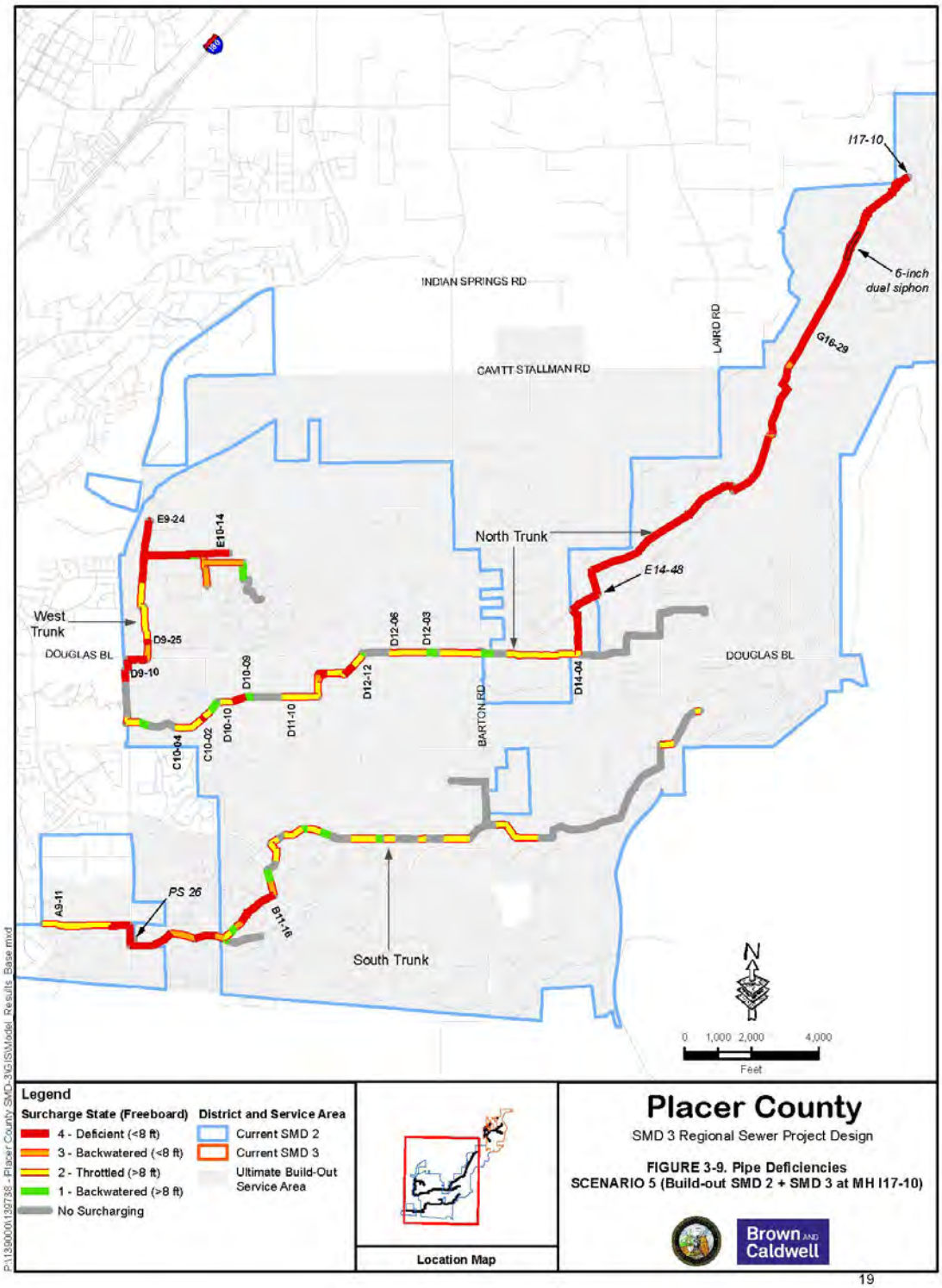
15


I17-10
H16-02
6-inch dual siphon
INDIAN SPRINGS RD
LARD RD
G16-29
CAVITT STALLMAN RD
E9-24
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D12-06
D12-03
D10-09
D12-12
D14-04
DOUGLAS BL
BARTON RD
C10-02
D10-10
D11-10
A9-11
PS 26
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Model Pipes
Upsized
Not Upsized
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-6. Pipe Upsizing
SCENARIO 3 (2010 SMD 2 + SMD 3 at MH E14-48)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd
16

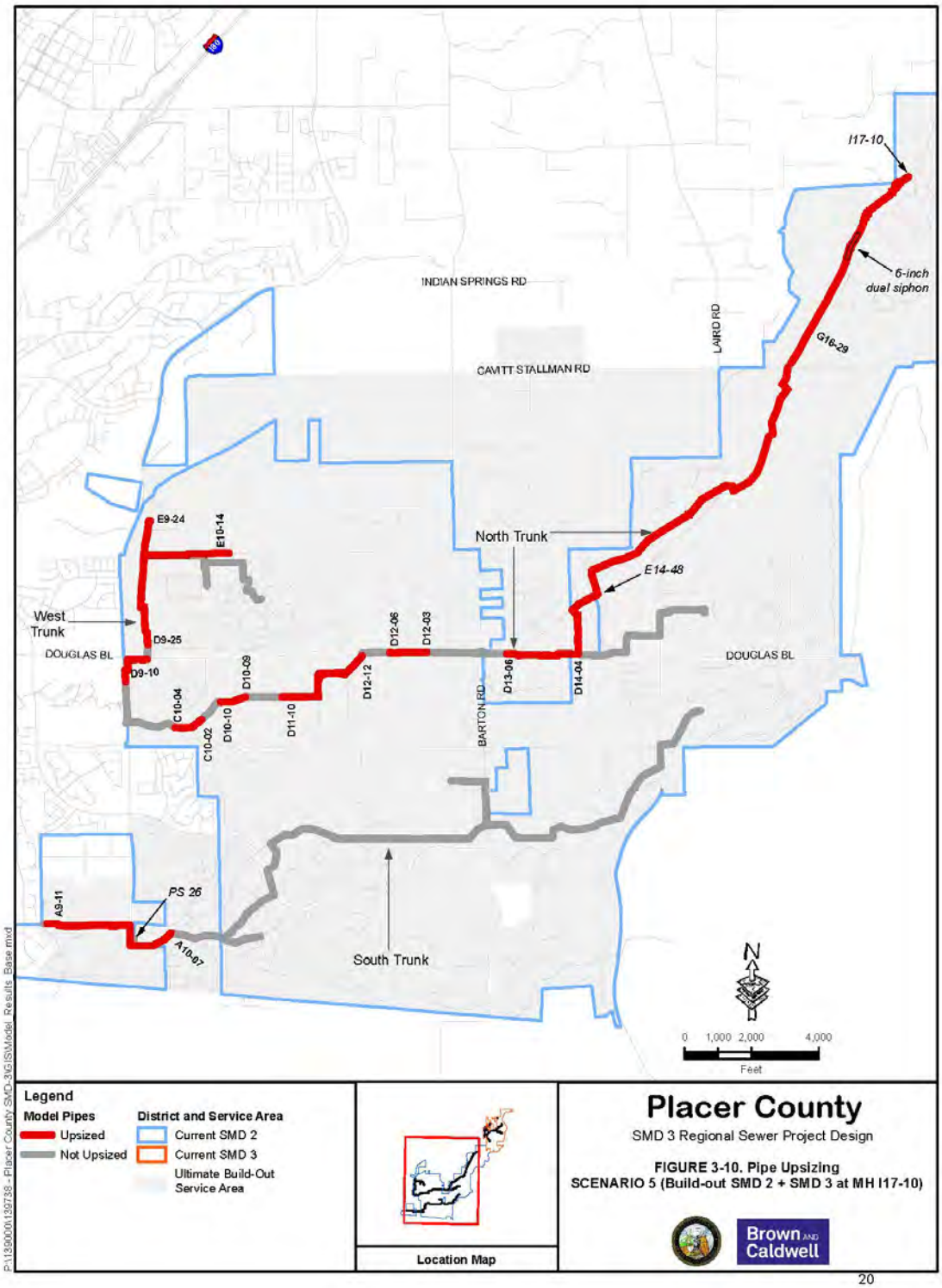

I17-10
H16-02
6-inch dual siphon
G16-29
INDIAN SPRINGS RD
LAIRD RD
CAVITT STALLMAN RD
E9-24
E10-14
North Trunk
E14-48
West Trunk
D9-25
D9-10
DOUGLAS BL
D10-09
D12-06
D12-03
D12-12
D14-04
DOUGLAS BL
C10-02
D10-10
D11-10
BARTON RD
B11-16
A9-11
PS 26
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Surcharge State (Freeboard)
4 - Deficient (<8 ft)
3 - Backwatered (<8 ft)
2 - Throttled (>8 ft)
1 - Backwatered (>8 ft)
No Surcharging
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-7. Pipe Deficiencies
SCENARIO 4 (Build-out SMD 2 Only)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd
17

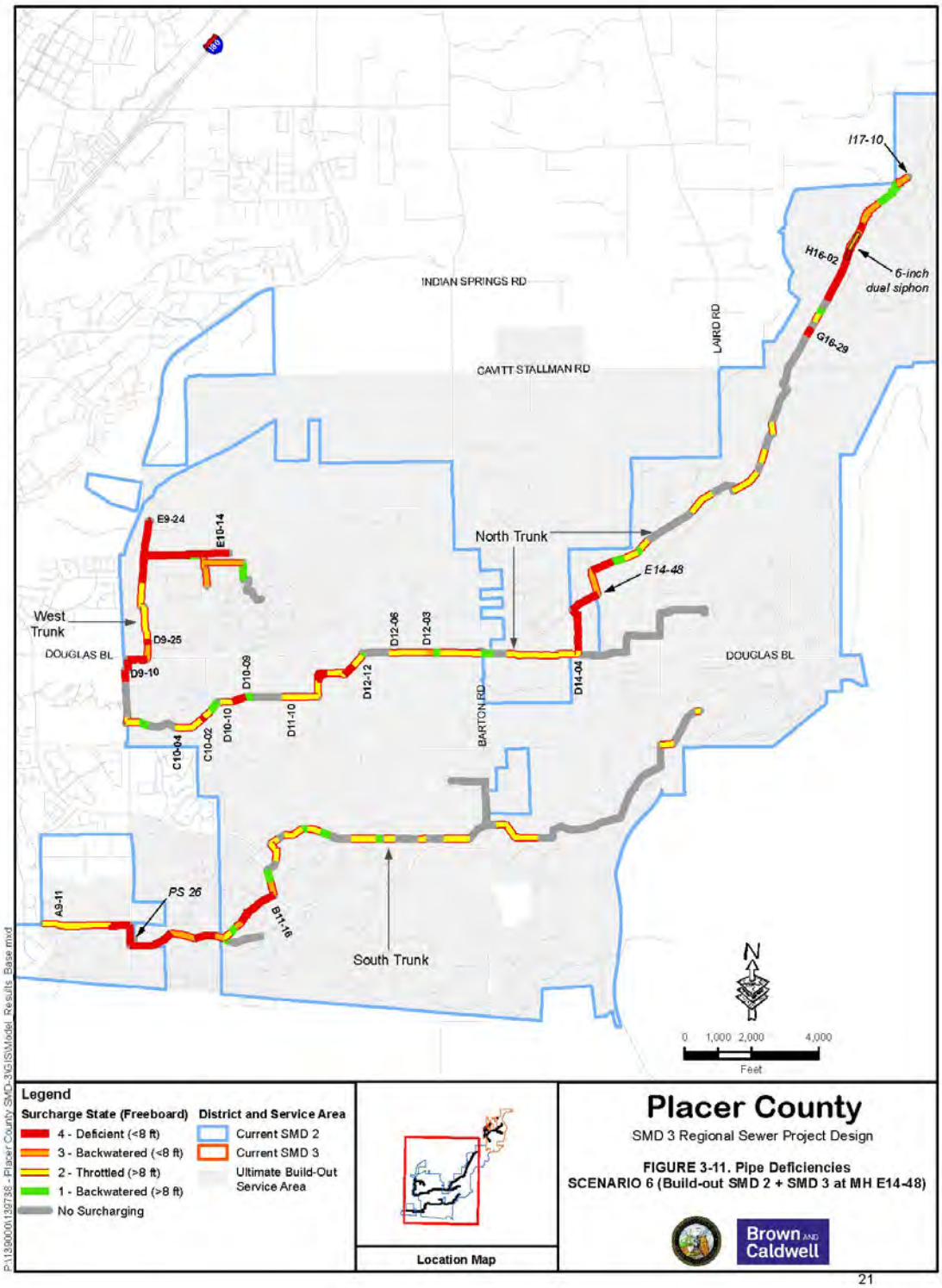

I17-10
H16-02
6-inch dual siphon
G16-29
INDIAN SPRINGS RD
LARD RD
CAVITT STALLMAN RD
E9-24
E10-14
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D9-10
D10-09
D12-06
D12-03
D12-12
D14-04
BARTON RD
C10-02
D10-10
D11-10
A9-11
PS 26
A10-07
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Model Pipes
Upsized
Not Upsized
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-8. Pipe Upsizing
SCENARIO 4 (Build-out SMD 2 Only)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd

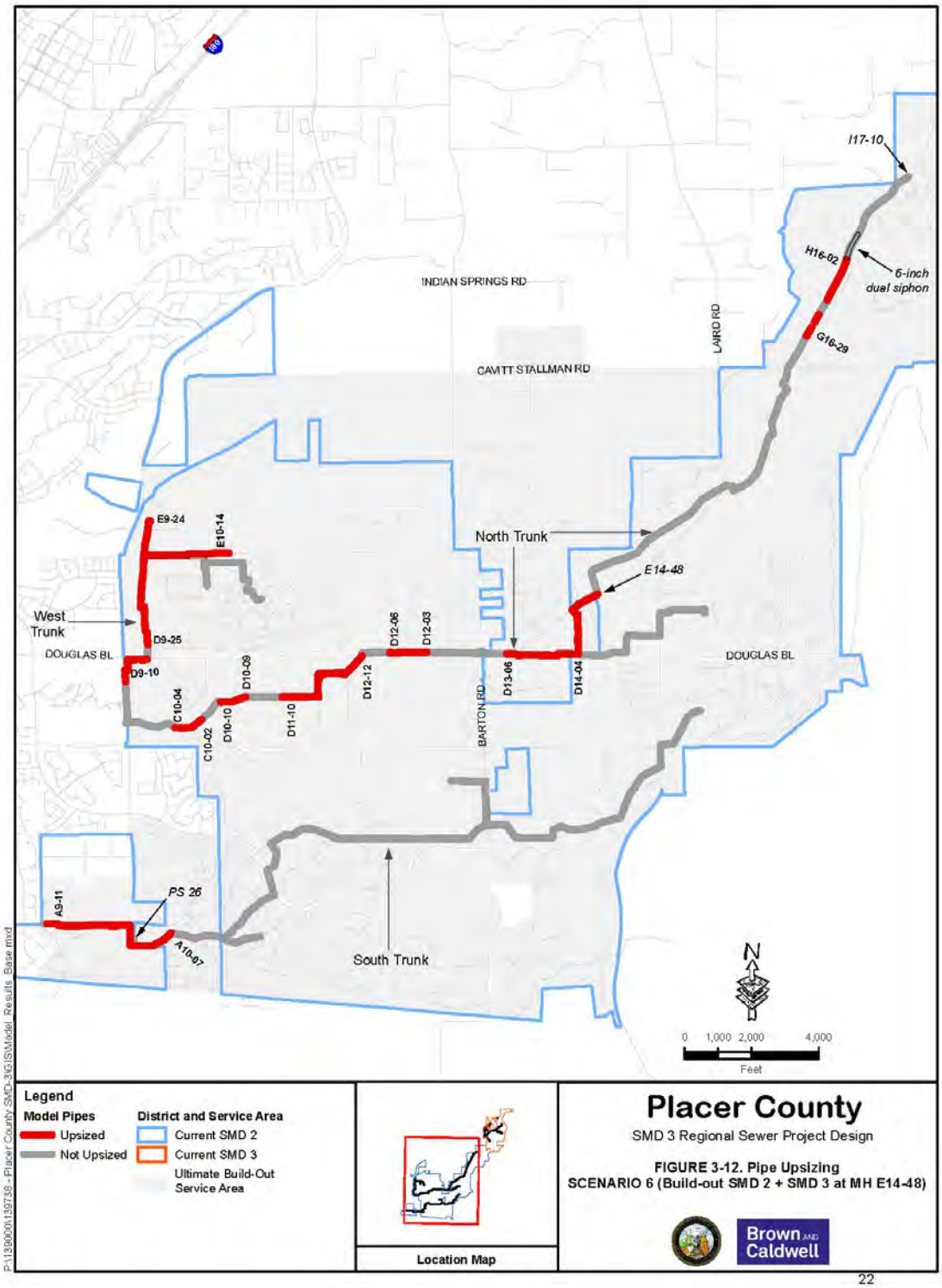
18

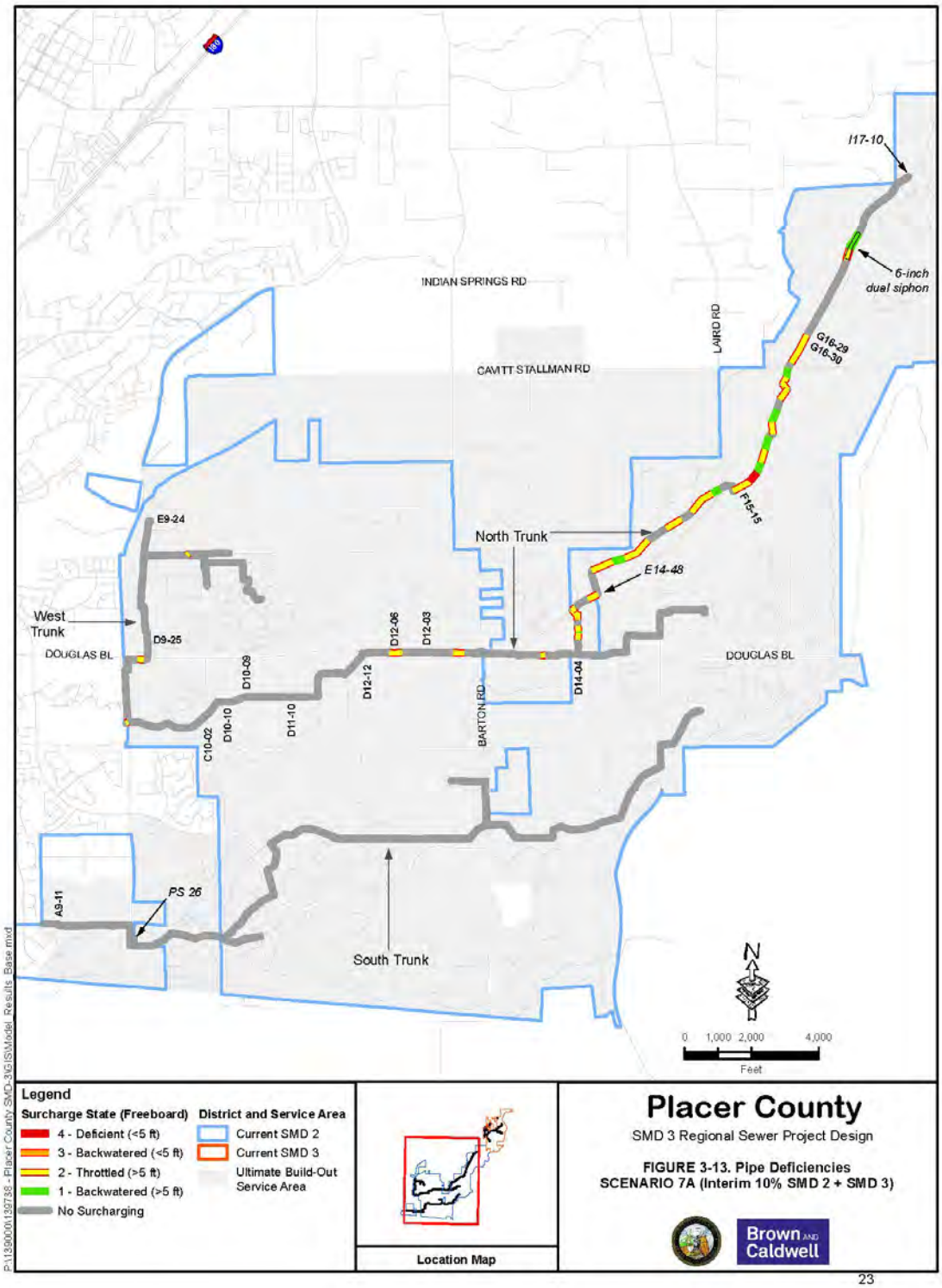

I17-10
6-inch dual siphon
G16-29
INDIAN SPRINGS RD
LAIRD RD
CAVITT STALLMAN RD
E9-24
E10-14
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D9-10
D10-09
D12-06
D12-03
D12-12
D14-04
DOUGLAS BL
BARTON RD
C10-04
C10-02
D10-10
D11-10
A9-11
PS 26
B11-16
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Surcharge State (Freeboard)
4 - Deficient (<8 ft)
3 - Backwatered (<8 ft)
2 - Throttled (>8 ft)
1 - Backwatered (>8 ft)
No Surcharging
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-9. Pipe Deficiencies
SCENARIO 5 (Build-out SMD 2 + SMD 3 at MH I17-10)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd

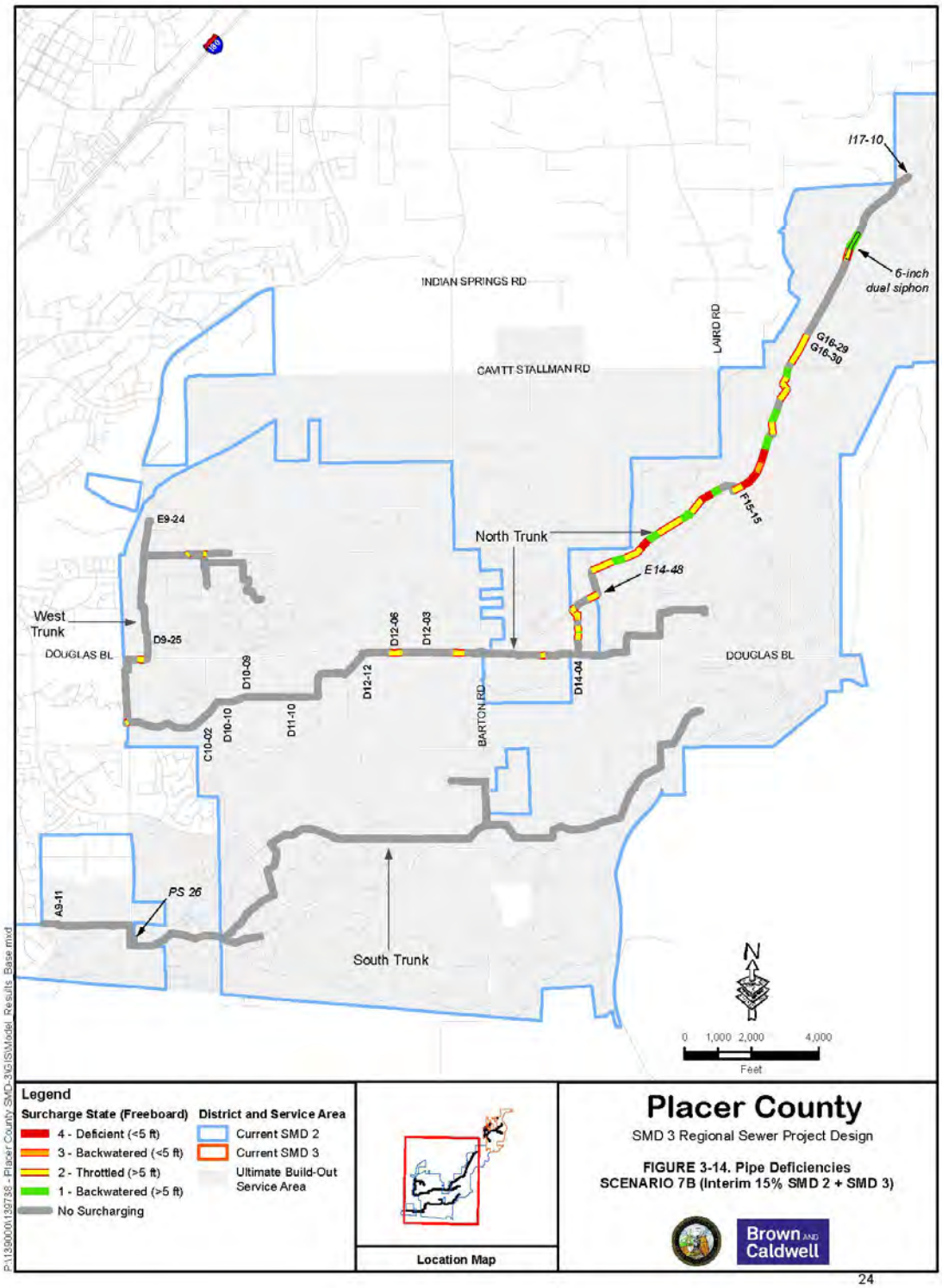
19

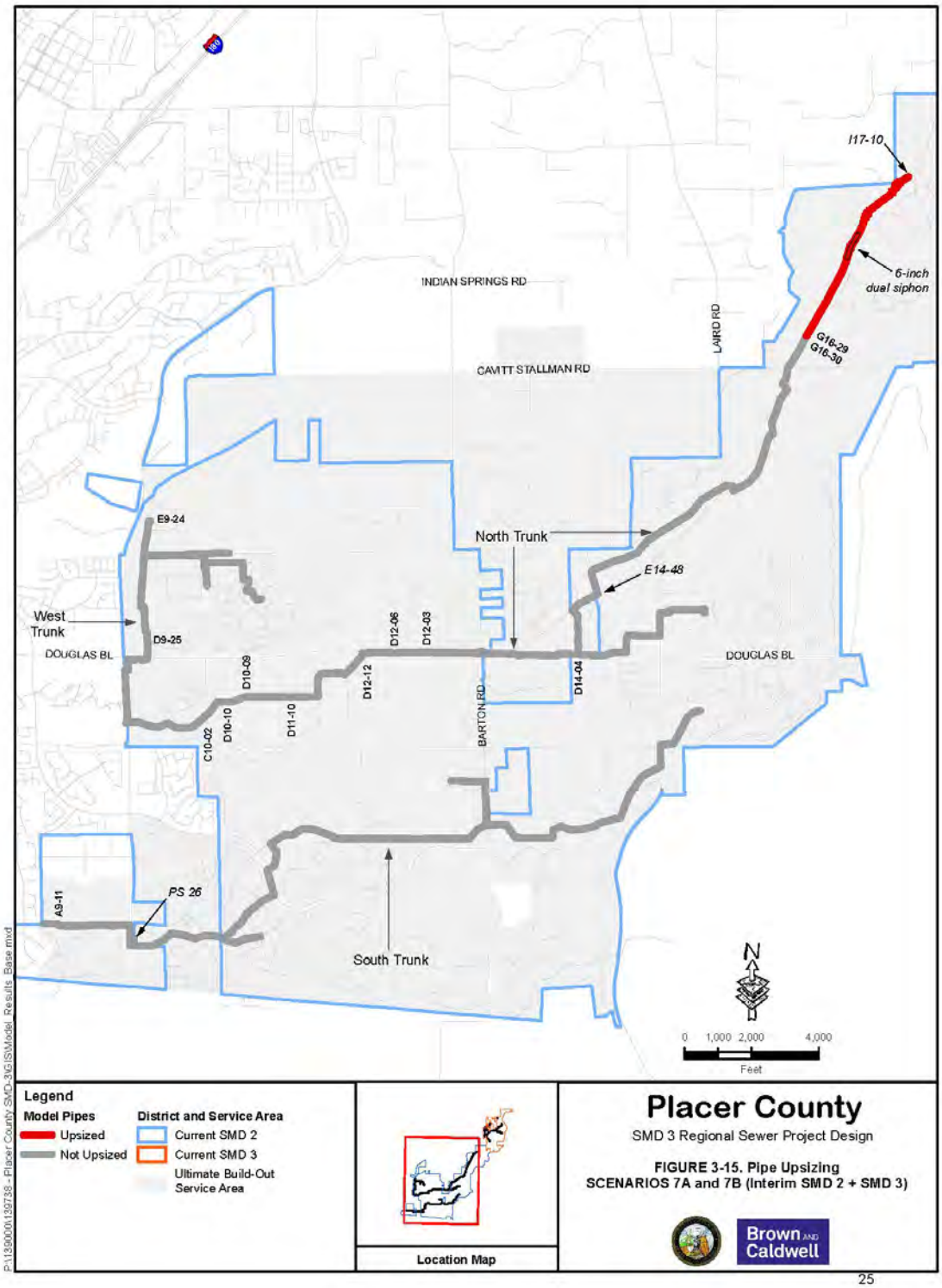

I17-10
6-inch dual siphon
INDIAN SPRINGS RD
LAIRD RD
G16-29
CAVITT STALLMAN RD
E9-24
E10-14
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D9-10
D10-09
D12-06
D12-03
D12-12
D13-06
D14-04
DOUGLAS BL
C10-04
D10-10
D11-10
C10-02
BARTON RD
A9-11
PS 26
A10-07
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Model Pipes
Upsized
Not Upsized
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-10. Pipe Upsizing
SCENARIO 5 (Build-out SMD 2 + SMD 3 at MH I17-10)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd


I17-10
H16-02
6-inch dual siphon
G16-29
INDIAN SPRINGS RD
CAVITT STALLMAN RD
LAIRD RD
E9-24
E10-14
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D9-10
D10-09
D12-06
D12-03
D12-12
D14-04
DOUGLAS BL
BARTON RD
C10-04
C10-02
D10-10
D11-10
A9-11
PS 26
B11-16
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Surcharge State (Freeboard)
4 - Deficient (<8 ft)
3 - Backwatered (<8 ft)
2 - Throttled (>8 ft)
1 - Backwatered (>8 ft)
No Surcharging
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-11. Pipe Deficiencies
SCENARIO 6 (Build-out SMD 2 + SMD 3 at MH E14-48)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd
21


I17-10
H16-02
6-inch dual siphon
G16-29
INDIAN SPRINGS RD
LARD RD
CAVITT STALLMAN RD
E9-24
E10-14
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D9-10
C10-04
D10-09
D12-06
D12-03
D12-12
D13-06
D14-04
BARTON RD
C10-02
D10-10
D11-10
A9-11
PS 26
A10-07
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Model Pipes
Upsized
Not Upsized
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-12. Pipe Upsizing
SCENARIO 6 (Build-out SMD 2 + SMD 3 at MH E14-48)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd

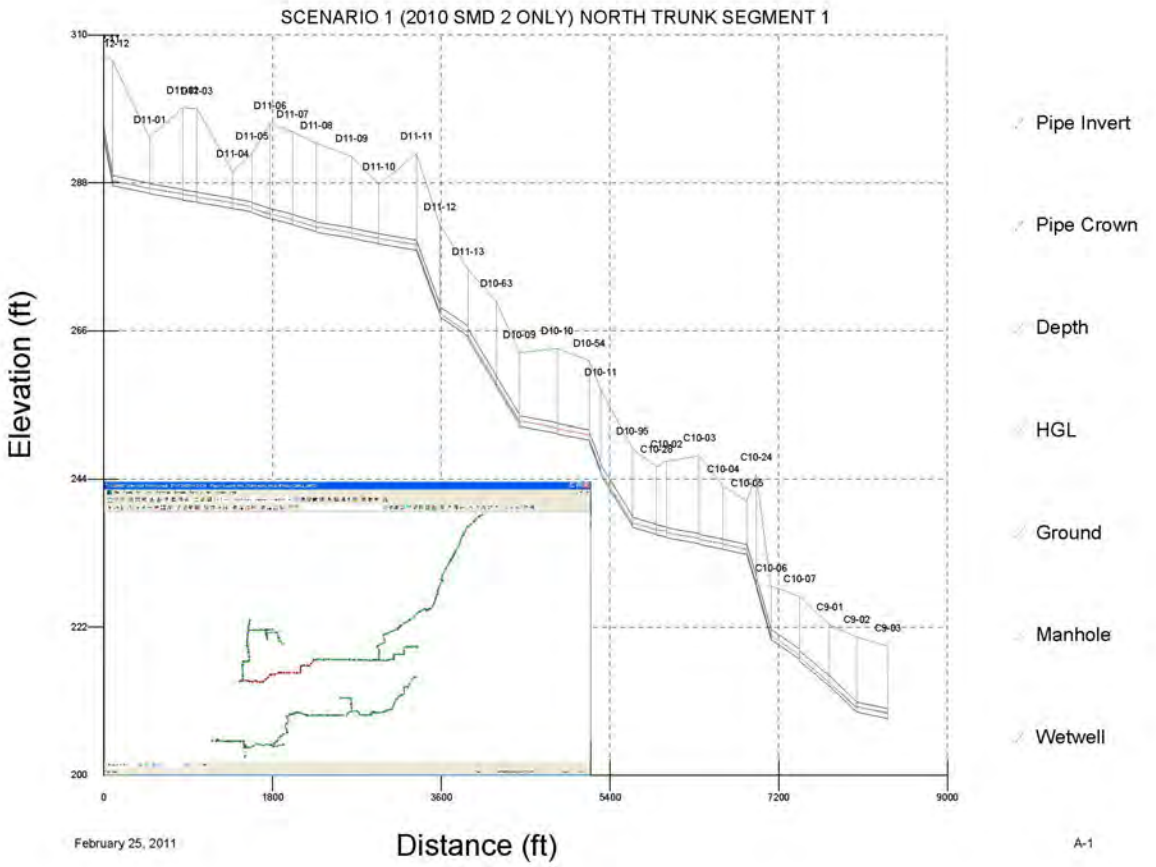

I17-10
6-inch dual siphon
INDIAN SPRINGS RD
LAIRD RD
CAVITT STALLMAN RD
G16-29
G16-30
F15-15
E14-48
North Trunk
E9-24
West Trunk
D9-25
DOUGLAS BL
D10-09
D12-06
D12-03
D12-12
D14-04
DOUGLAS BL
BARTON RD
C10-02
D10-10
D11-10
A9-11
PS 26
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Surcharge State (Freeboard)
4 - Deficient (<5 ft)
3 - Backwatered (<5 ft)
2 - Throttled (>5 ft)
1 - Backwatered (>5 ft)
No Surcharging
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-13. Pipe Deficiencies
SCENARIO 7A (Interim 10% SMD 2 + SMD 3)
Brown AND Caldwell
P:\13900\139738 - Placer County SMD-3\GIS\Model Results Base.mxd
23

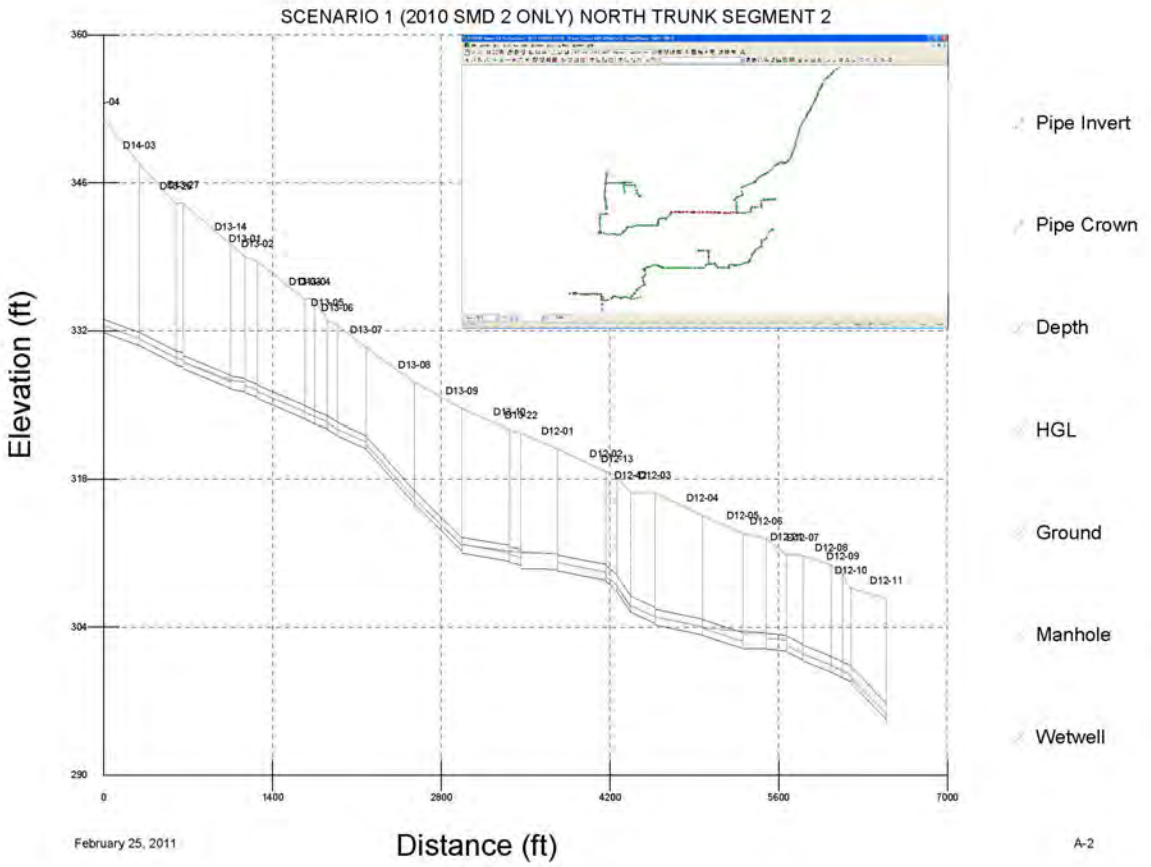

I17-10
6-inch dual siphon
INDIAN SPRINGS RD
LAIRD RD
CAVITT STALLMAN RD
G16-29
G16-30
F15-15
E14-48
E9-24
North Trunk
West Trunk
D9-25
DOUGLAS BL
D12-06
D12-03
D10-09
D12-12
D14-04
BARTON RD
C10-02
D10-10
D11-10
A9-11
PS 26
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Surcharge State (Freeboard)
4 - Deficient (<5 ft)
3 - Backwatered (<5 ft)
2 - Throttled (>5 ft)
1 - Backwatered (>5 ft)
No Surcharging
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-14. Pipe Deficiencies
SCENARIO 7B (Interim 15% SMD 2 + SMD 3)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd
24

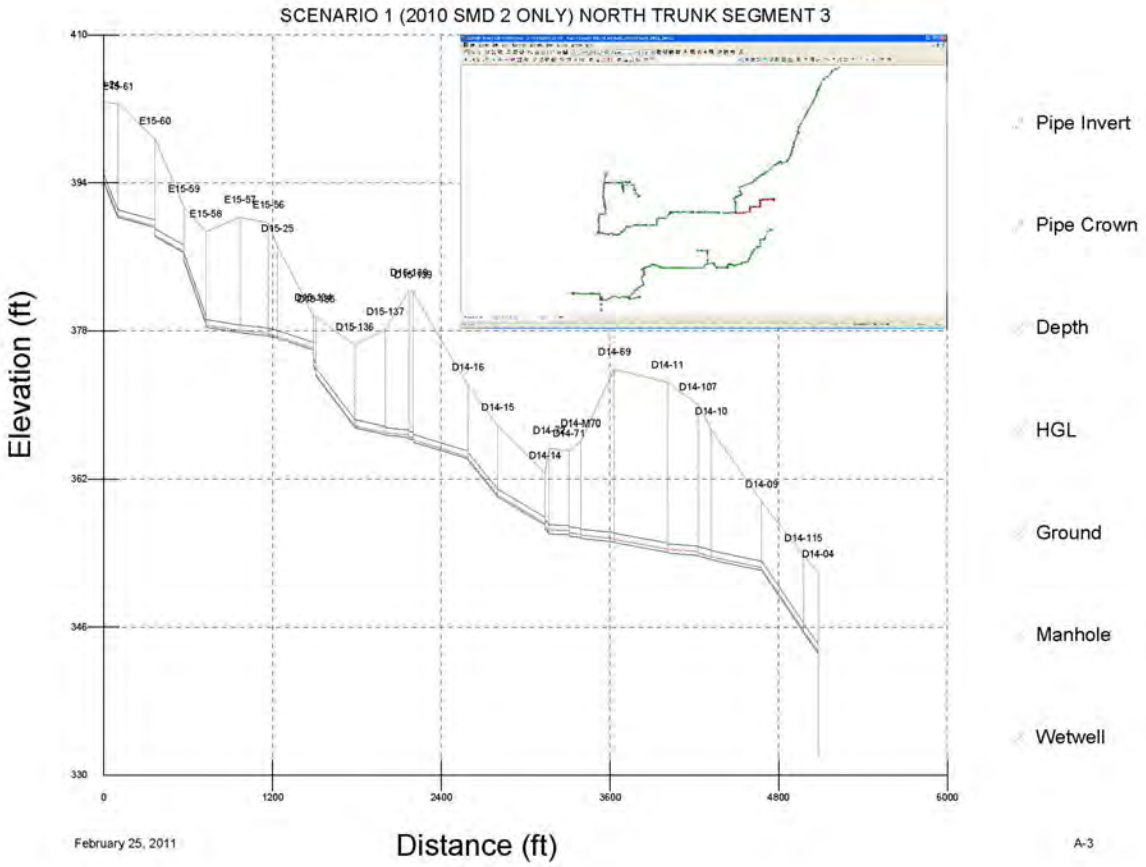

I17-10
6-inch dual siphon
G16-29
G16-30
INDIAN SPRINGS RD
LARD RD
CAVITT STALLMAN RD
E9-24
North Trunk
E14-48
West Trunk
D9-25
DOUGLAS BL
D12-06
D12-03
D10-09
D12-12
D14-04
BARTON RD
C10-02
D10-10
D11-10
A9-11
PS 26
South Trunk
N
0 1,000 2,000 4,000
Feet
Legend
Model Pipes
Upsized
Not Upsized
District and Service Area
Current SMD 2
Current SMD 3
Ultimate Build-Out Service Area
Location Map
Placer County
SMD 3 Regional Sewer Project Design
FIGURE 3-15. Pipe Upsizing
SCENARIOS 7A and 7B (Interim SMD 2 + SMD 3)
Brown AND Caldwell
P:\139000\139738 - Placer County SMD-3\GIS\Model Results Base.mxd

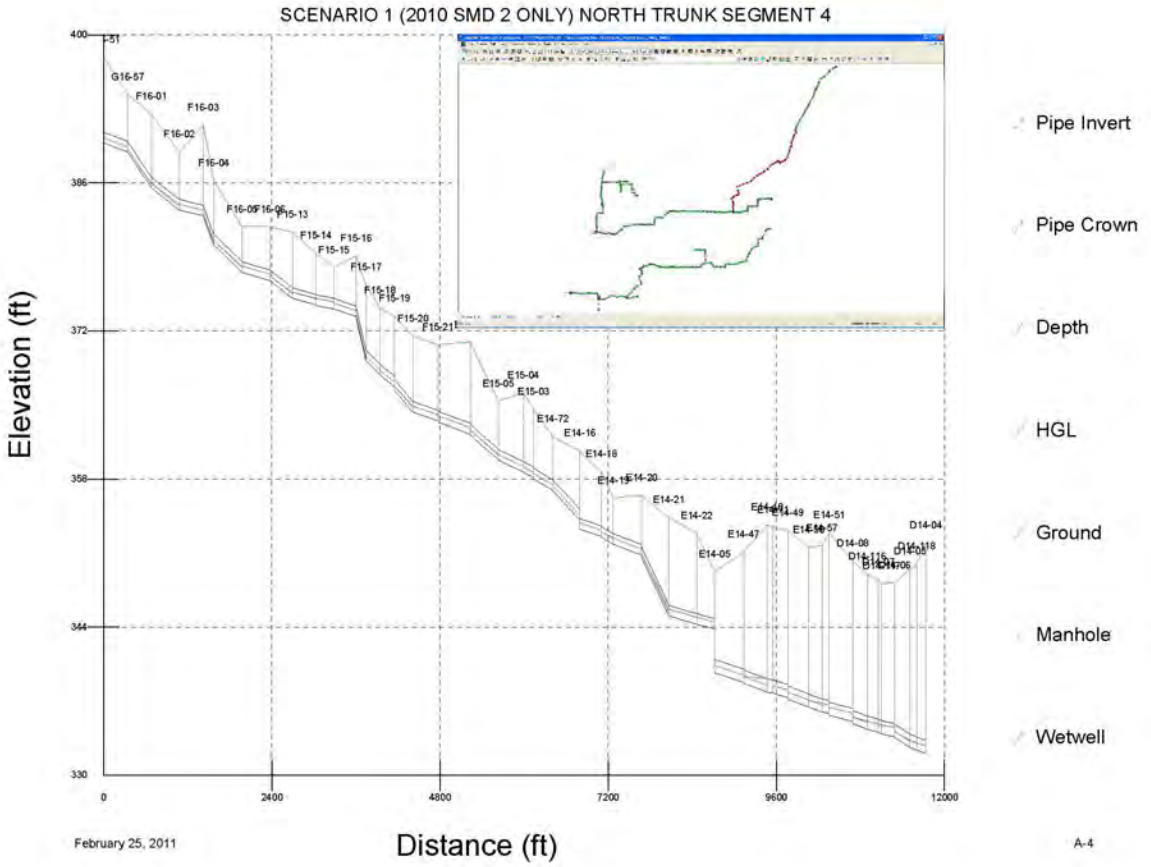
25

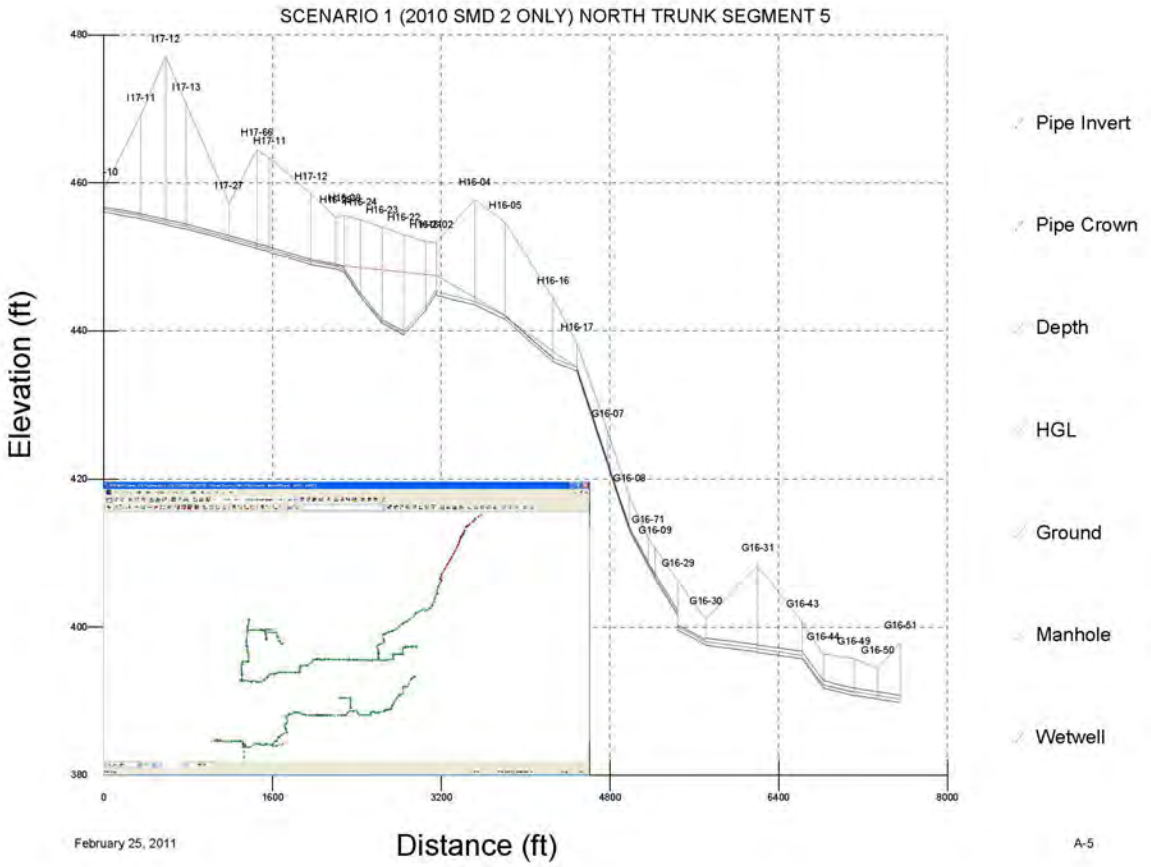
Attachment A: Hydraulic Profiles

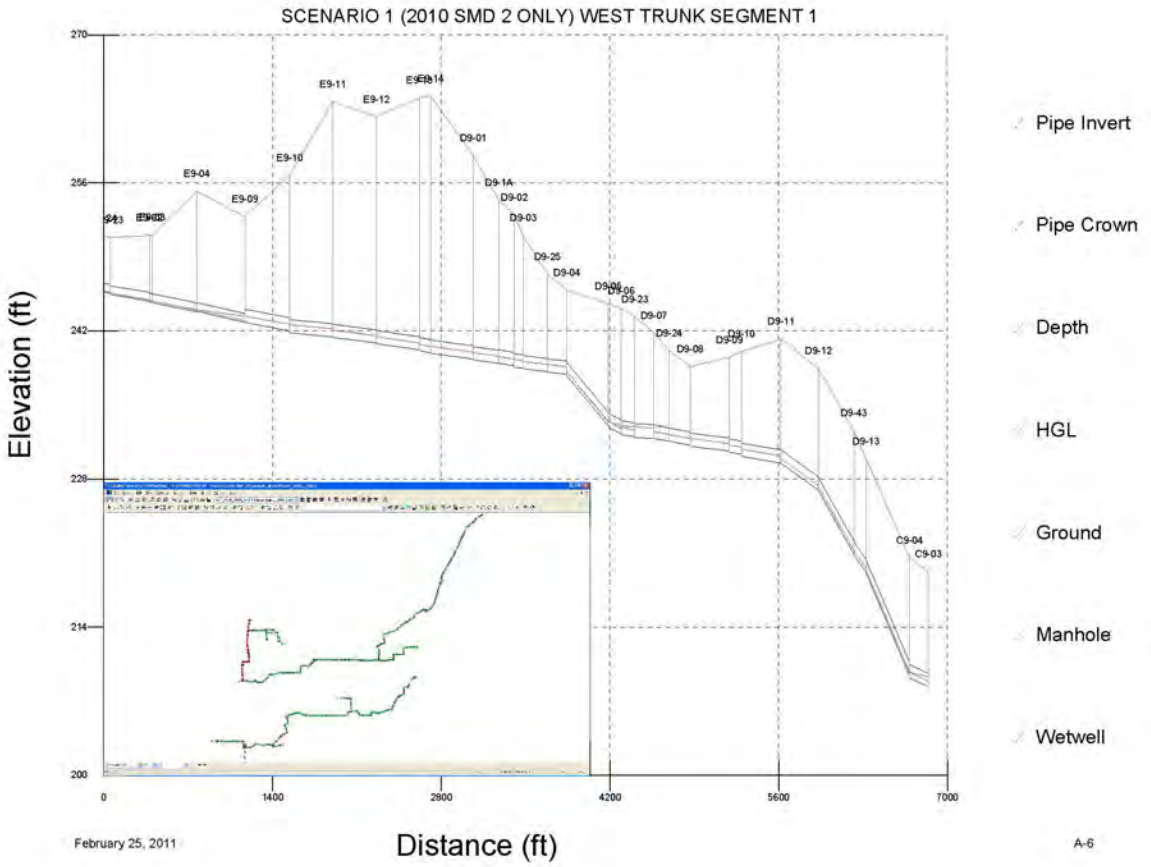

SCENARIO 1 (2010 SMD 2 ONLY) NORTH TRUNK SEGMENT 1
Elevation (ft)
310
288
266
244
222
200
0
1800
3600
5400
7200
9000
Distance (ft)
February 25, 2011
A-1
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

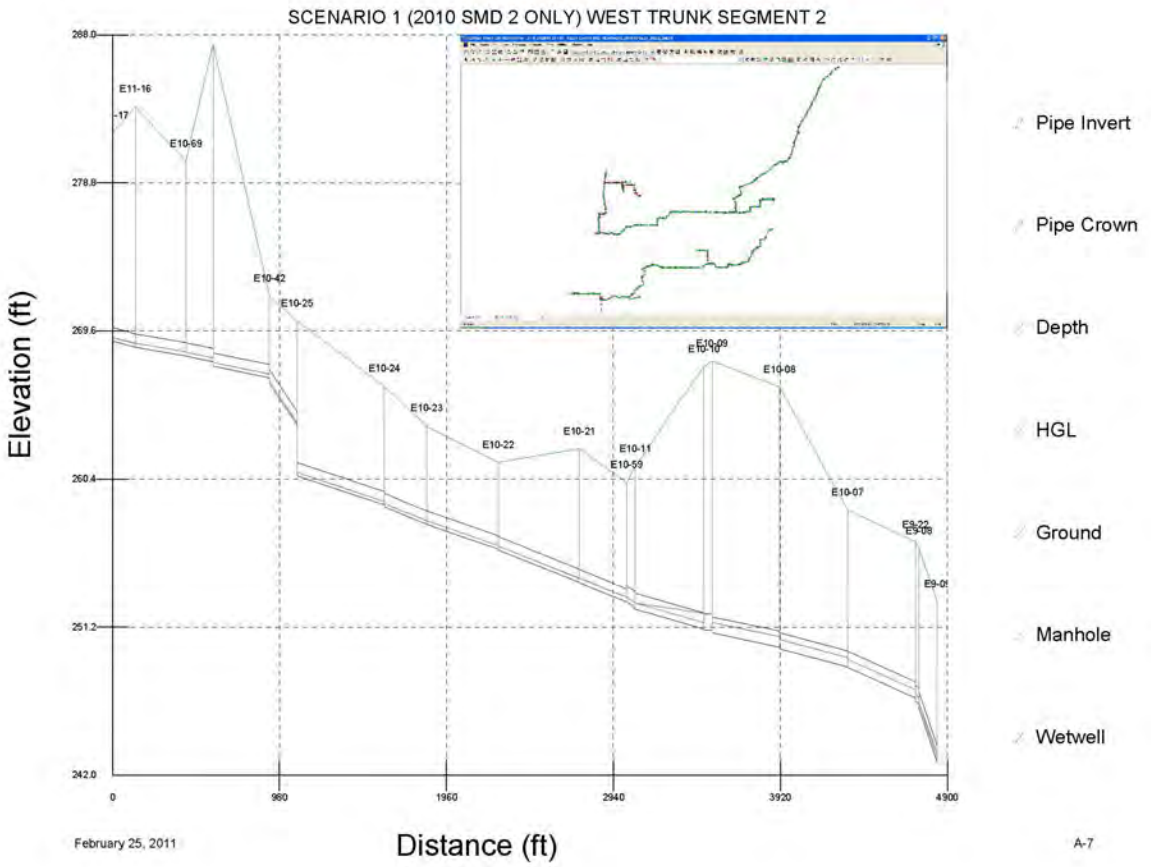

SCENARIO 1 (2010 SMD 2 ONLY) NORTH TRUNK SEGMENT 2
Elevation (ft)
360
346
332
318
304
290
0
1400
2800
4200
5600
7000
Distance (ft)
February 25, 2011
A-2
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

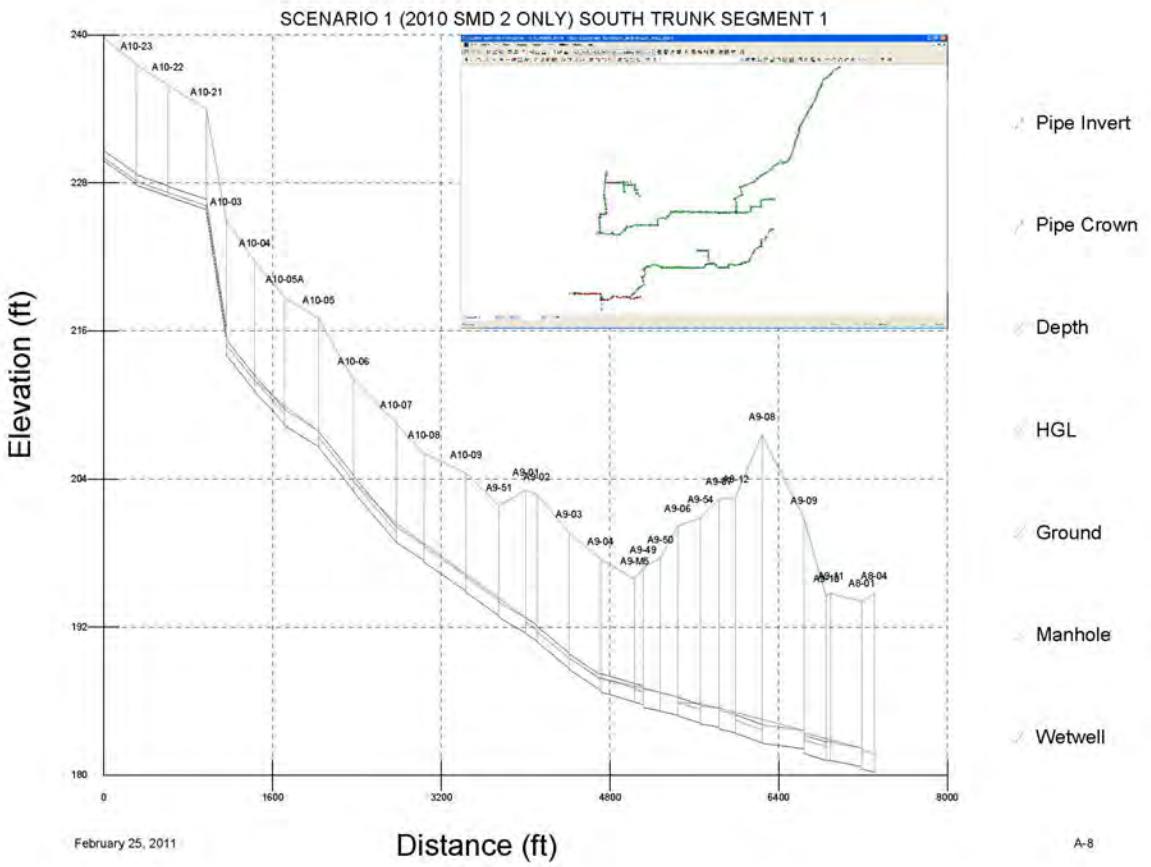

SCENARIO 1 (2010 SMD 2 ONLY) NORTH TRUNK SEGMENT 3
Elevation (ft)
410
394
378
362
346
330
0
1200
2400
3600
4800
6000
Distance (ft)
February 25, 2011
A-3
E15-60
E15-59
E15-58
E15-57
E15-56
D15-25
D15-137
D15-136
D14-16
D14-15
D14-69
D14-11
D14-107
D14-10
D14-09
D14-115
D14-04
D14-14
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

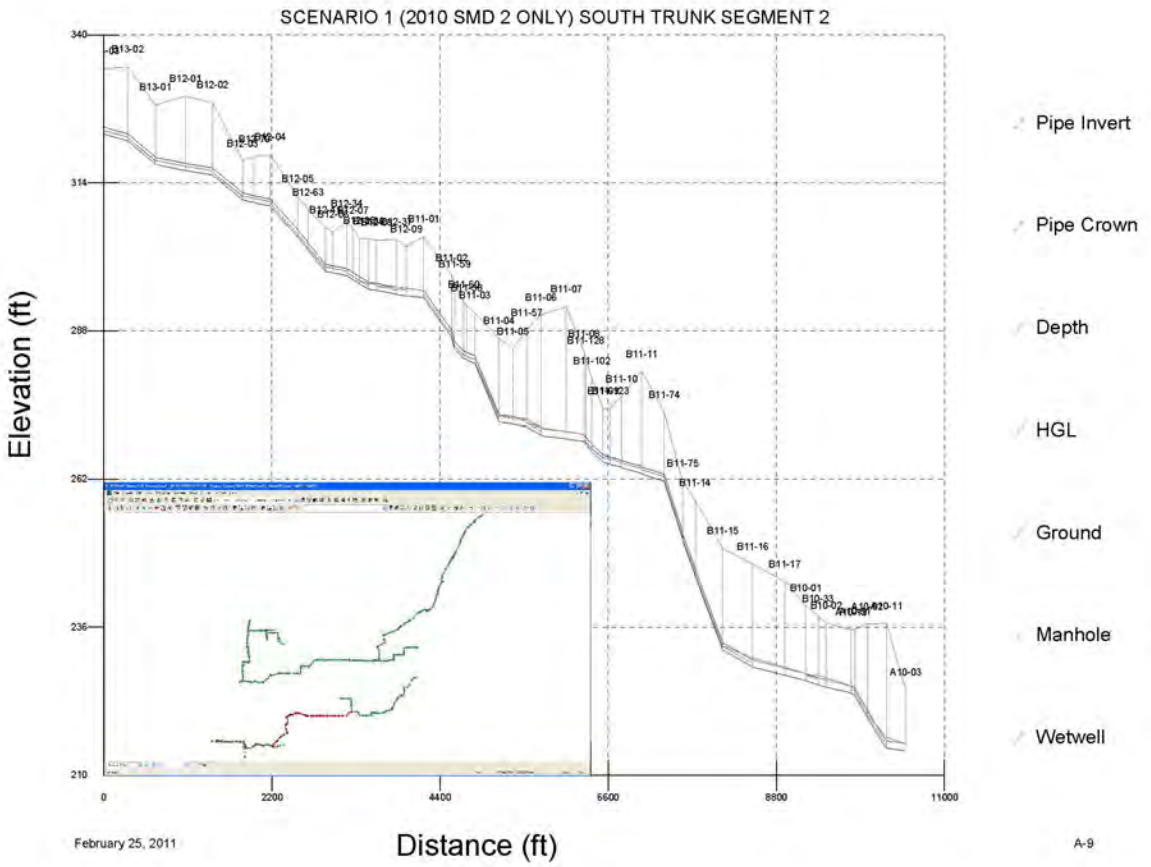

SCENARIO 1 (2010 SMD 2 ONLY) NORTH TRUNK SEGMENT 4
Elevation (ft)
400
386
372
358
344
330
0
2400
4800
7200
9600
12000
Distance (ft)
February 25, 2011
A-4
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

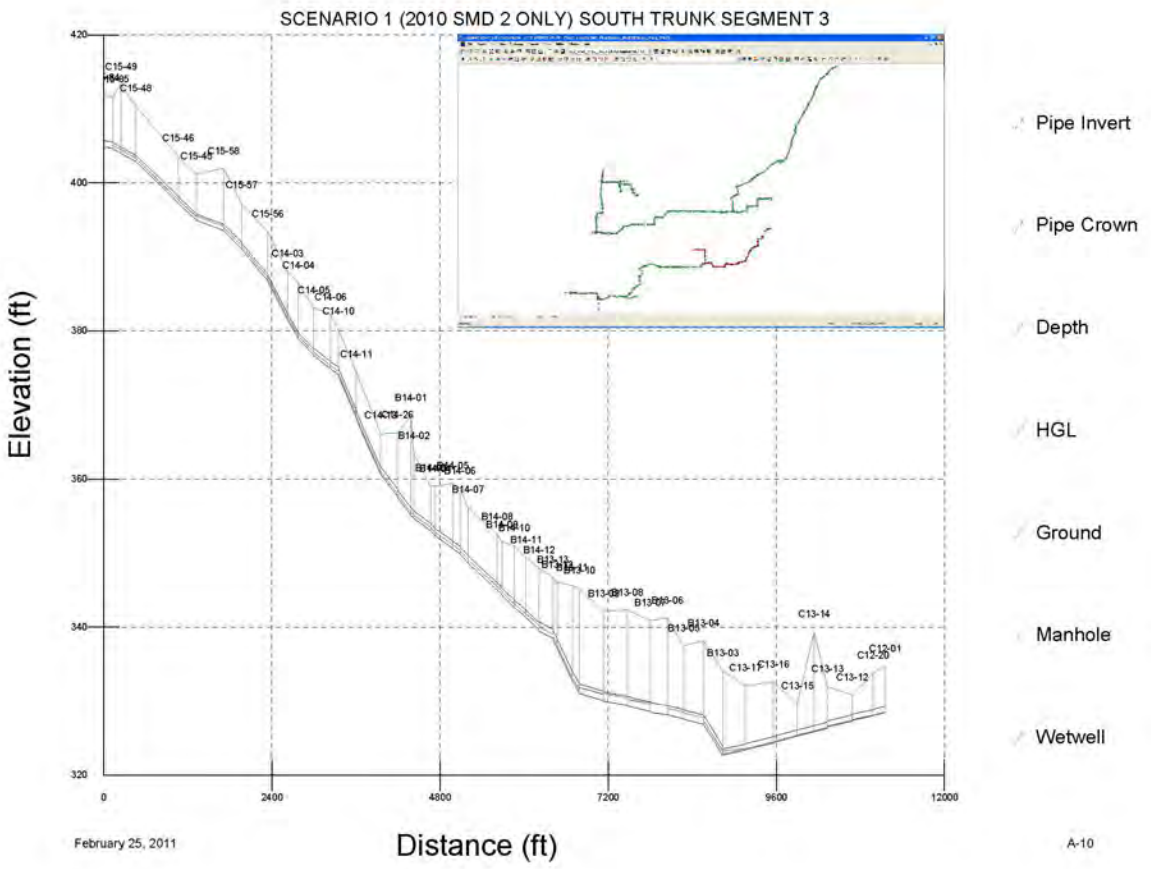

SCENARIO 1 (2010 SMD 2 ONLY) NORTH TRUNK SEGMENT 5
Elevation (ft)
480
460
440
420
400
380
0
1600
3200
4800
6400
8000
Distance (ft)
I17-12
I17-11
I17-13
H17-66
H17-11
I17-27
H17-12
H16-04
H16-05
H16-16
H16-17
G16-07
G16-08
G16-71
G16-09
G16-29
G16-31
G16-30
G16-43
G16-51
G16-44
G16-49
G16-50
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-5

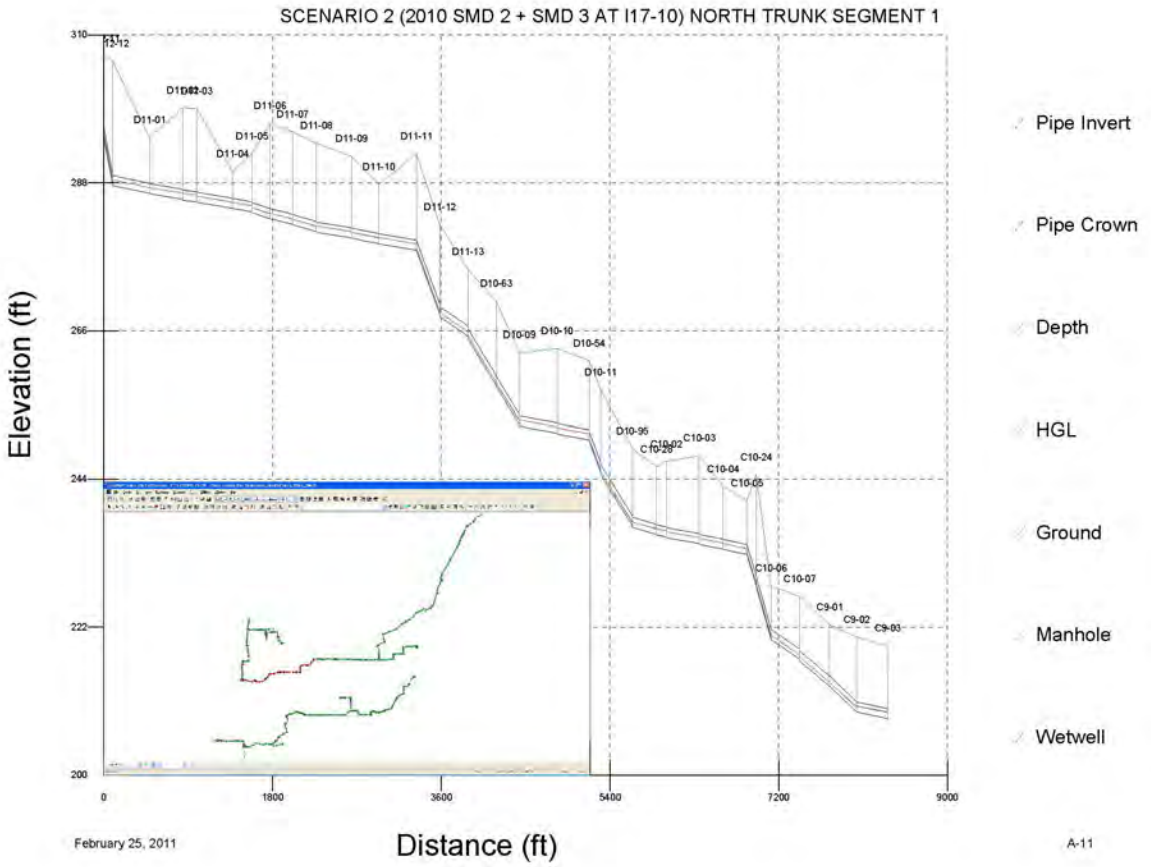

SCENARIO 1 (2010 SMD 2 ONLY) WEST TRUNK SEGMENT 1
Elevation (ft)
270
256
242
228
214
200
0
1400
2800
4200
5600
7000
Distance (ft)
February 25, 2011
A-6
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

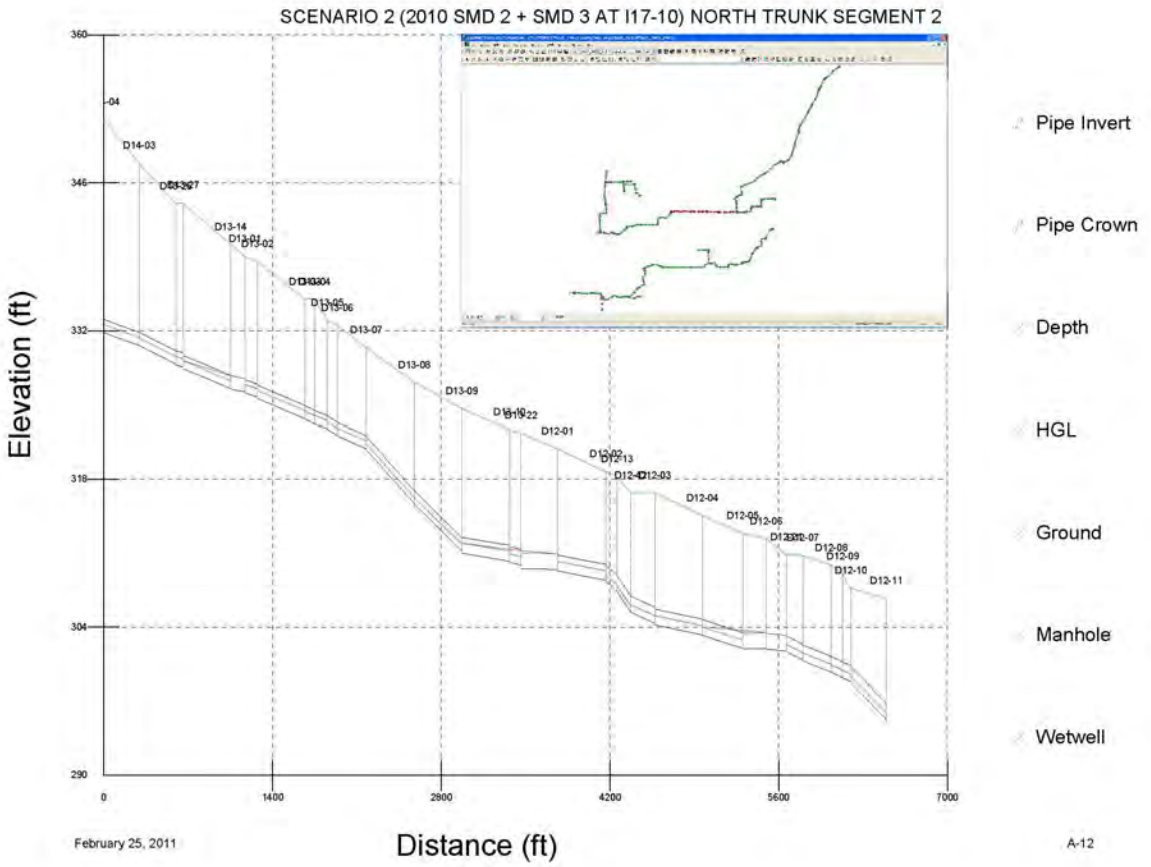

SCENARIO 1 (2010 SMD 2 ONLY) WEST TRUNK SEGMENT 2
Elevation (ft)
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
E11-16
E10-69
E10-42
E10-25
E10-24
E10-23
E10-22
E10-21
E10-11
E10-59
E10-09
E10-10
E10-08
E10-07
February 25, 2011
A-7

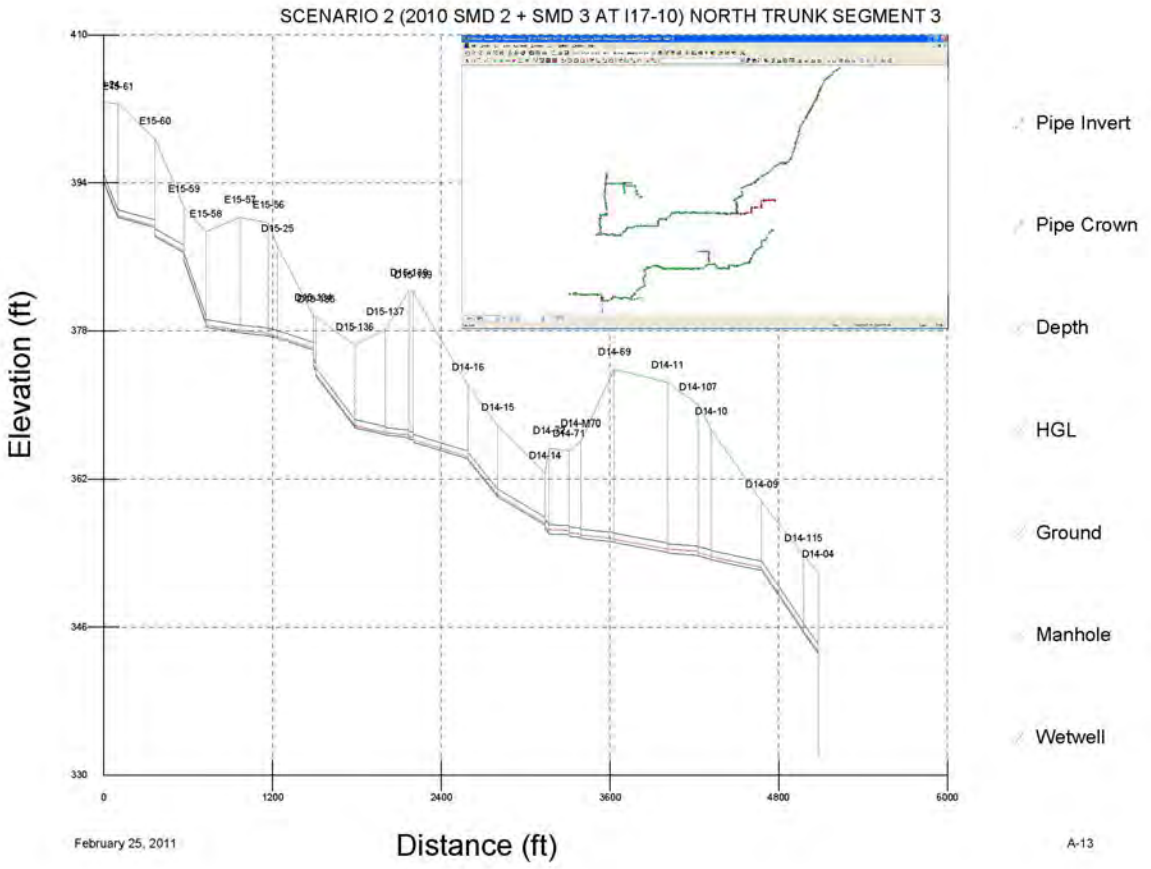

SCENARIO 1 (2010 SMD 2 ONLY) SOUTH TRUNK SEGMENT 1
Elevation (ft)
240
228
216
204
192
180
0
1600
3200
4800
6400
8000
Distance (ft)
February 25, 2011
A-8
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

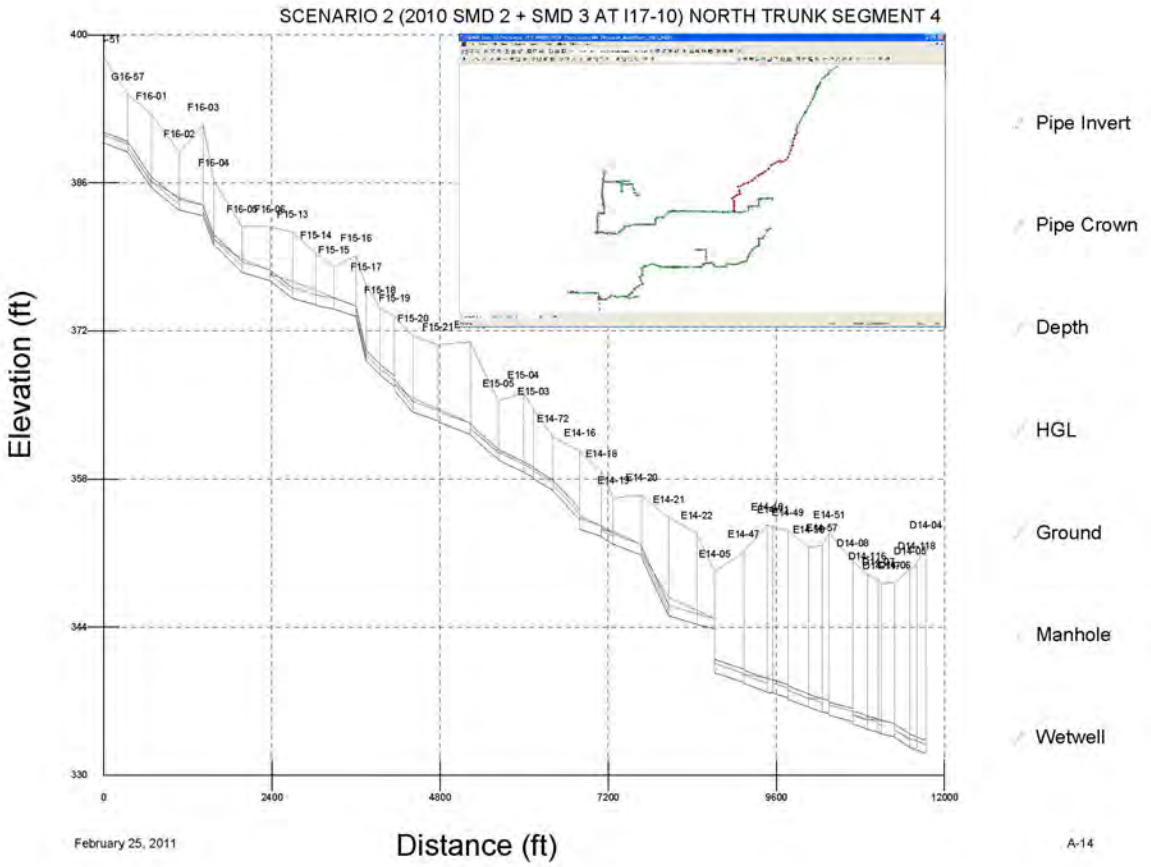

SCENARIO 1 (2010 SMD 2 ONLY) SOUTH TRUNK SEGMENT 2
Elevation (ft)
340
314
288
262
236
210
0
2200
4400
6600
8800
11000
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-9

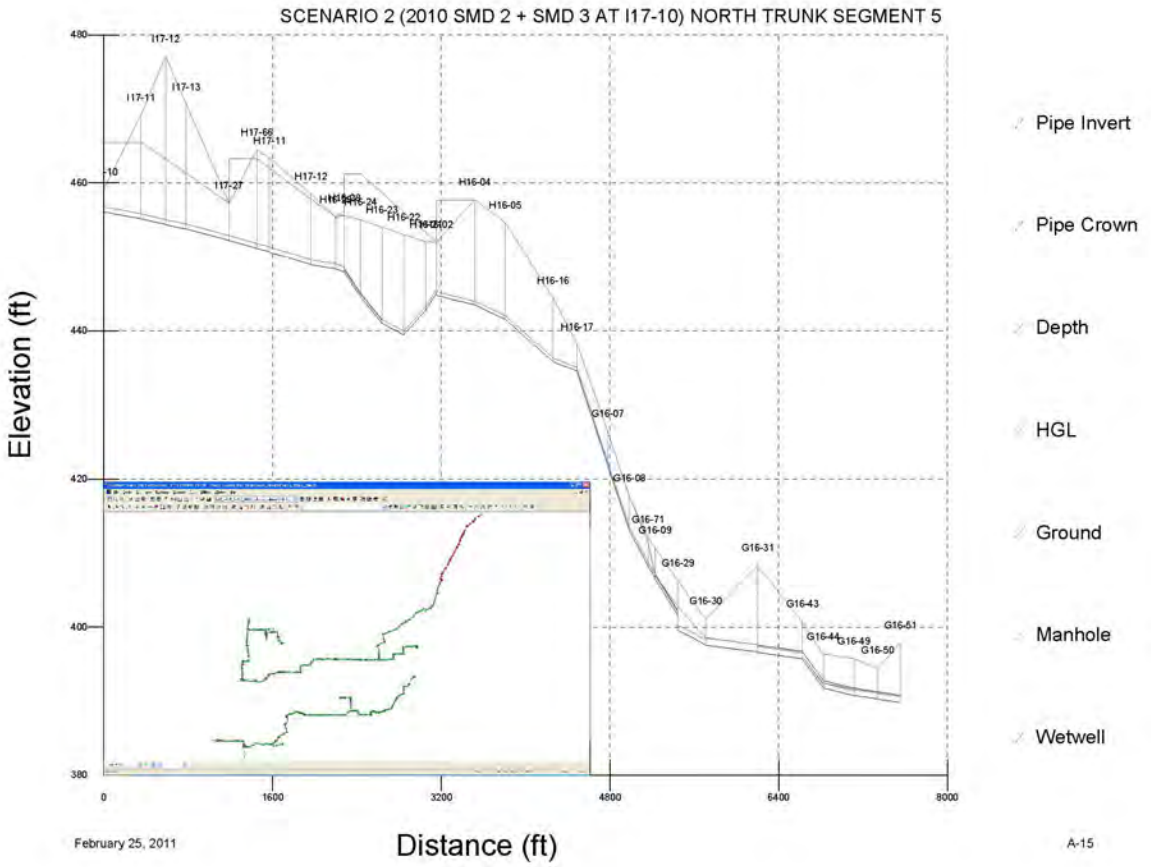

SCENARIO 1 (2010 SMD 2 ONLY) SOUTH TRUNK SEGMENT 3
Elevation (ft)
420
400
380
360
340
320
0
2400
4800
7200
9600
12000
Distance (ft)
February 25, 2011
A-10
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

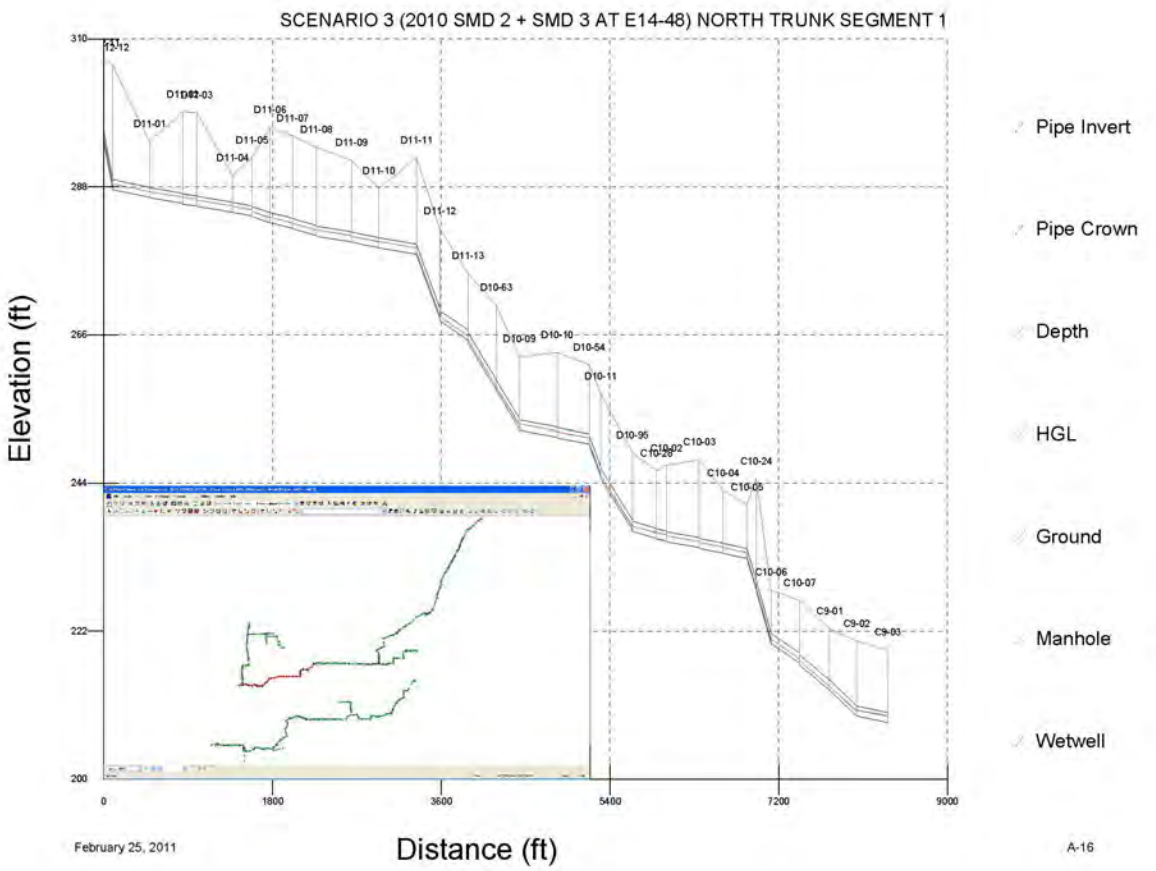

SCENARIO 2 (2010 SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 1
Elevation (ft)
310
288
266
244
222
200
0
1800
3600
5400
7200
9000
Distance (ft)
February 25, 2011
A-11
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

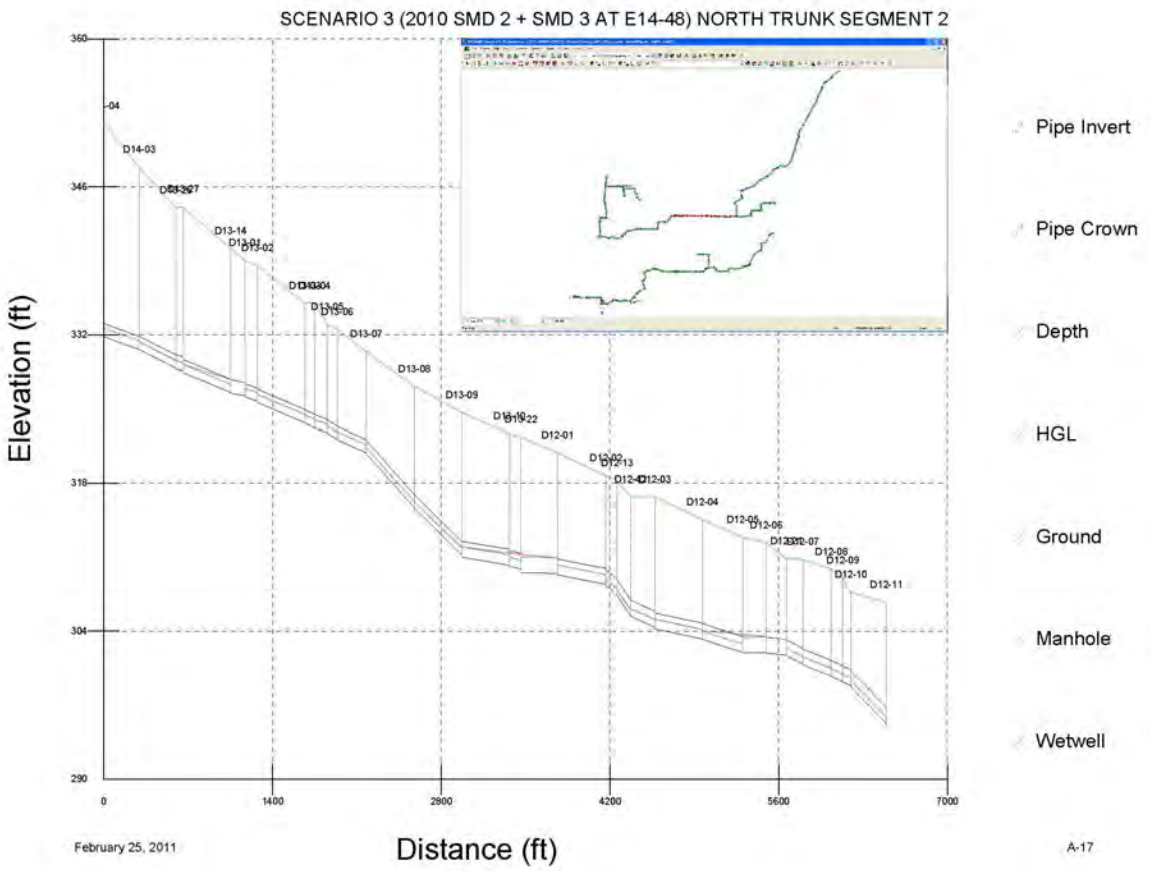

SCENARIO 2 (2010 SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 2
Elevation (ft)
360
346
332
318
304
290
0
1400
2800
4200
5600
7000
Distance (ft)
February 25, 2011
A-12
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

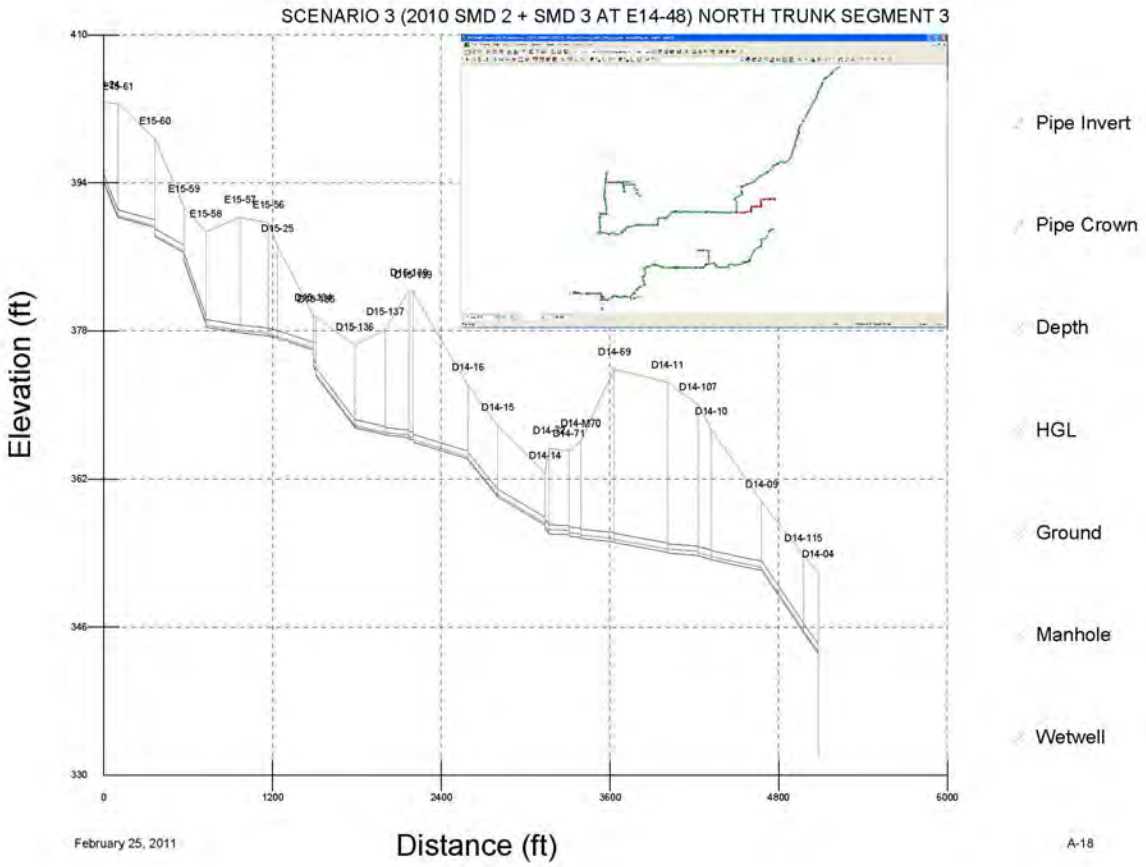

SCENARIO 2 (2010 SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 3
Elevation (ft)
410
394
378
362
346
330
0
1200
2400
3600
4800
6000
Distance (ft)
E15-61
E15-60
E15-59
E15-58
E15-57
E15-56
D15-25
D15-137
D15-136
D14-16
D14-15
D14-69
D14-11
D14-107
D14-10
D14-M70
D14-71
D14-14
D14-09
D14-115
D14-04
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-13

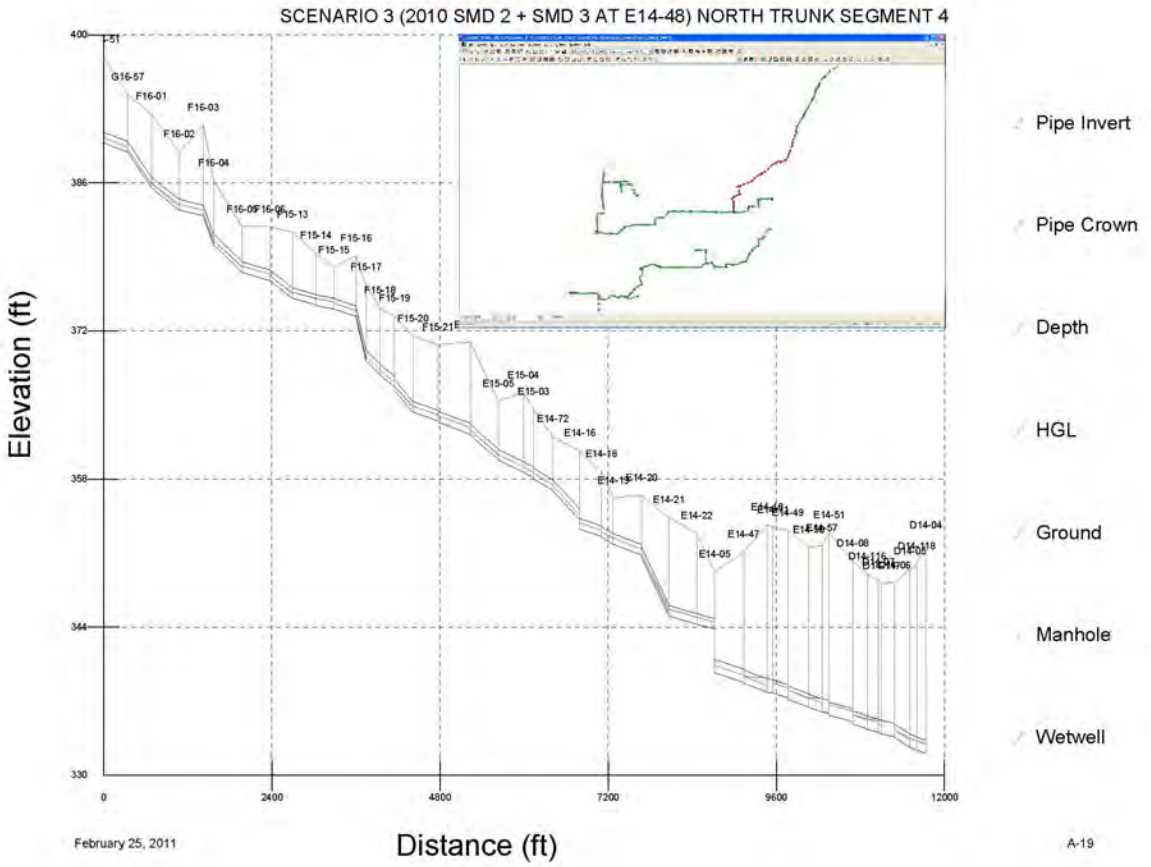

SCENARIO 2 (2010 SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 4
Elevation (ft)
400
386
372
358
344
330
0
2400
4800
7200
9600
12000
Distance (ft)
February 25, 2011
A-14
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

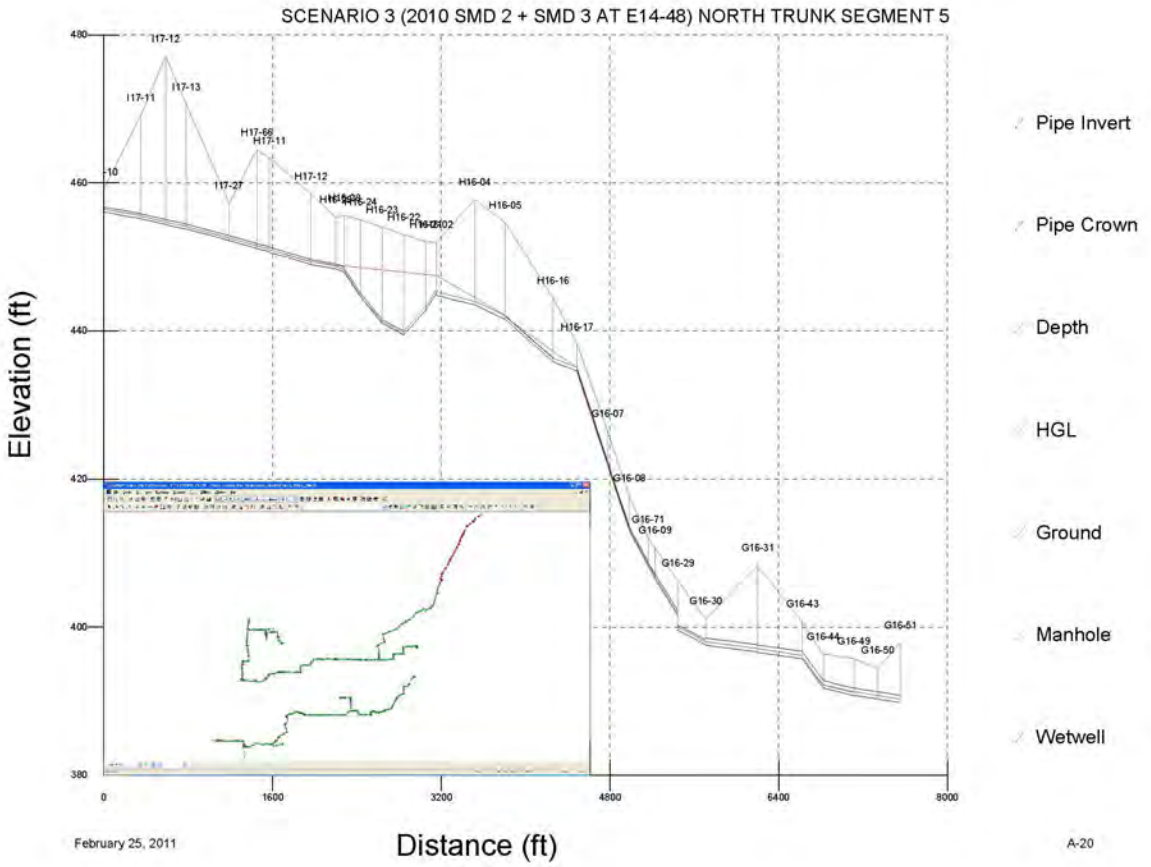

SCENARIO 2 (2010 SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 5
Elevation (ft)
480
460
440
420
400
380
0
1600
3200
4800
6400
8000
Distance (ft)
I17-12
I17-11
I17-13
H17-66
H17-11
I17-10
I17-27
H17-12
H16-04
H16-05
H16-24
H16-23
H16-22
H16-16
H16-17
G16-07
G16-08
G16-71
G16-09
G16-29
G16-31
G16-30
G16-43
G16-51
G16-44
G16-49
G16-50
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-15

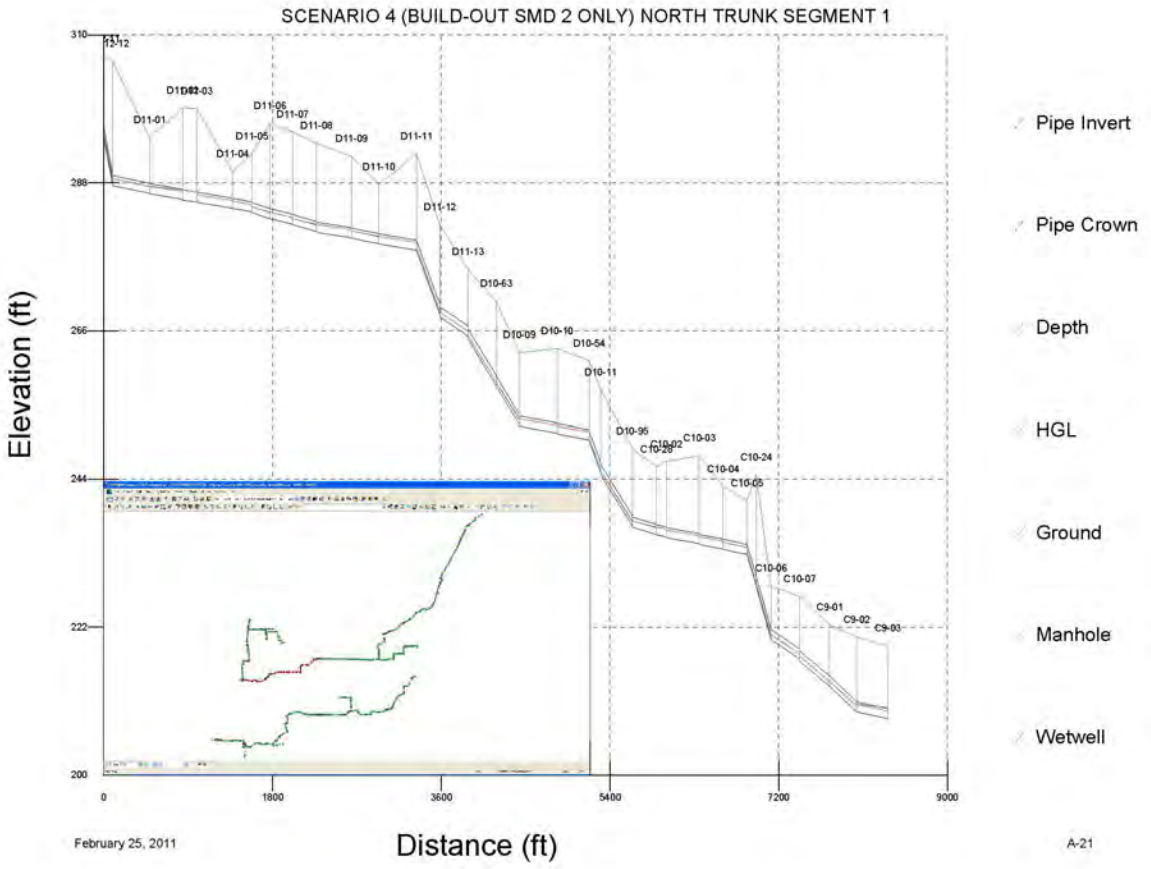

SCENARIO 3 (2010 SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 1
Elevation (ft)
310
288
266
244
222
200
0
1800
3600
5400
7200
9000
Distance (ft)
February 25, 2011
A-16
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

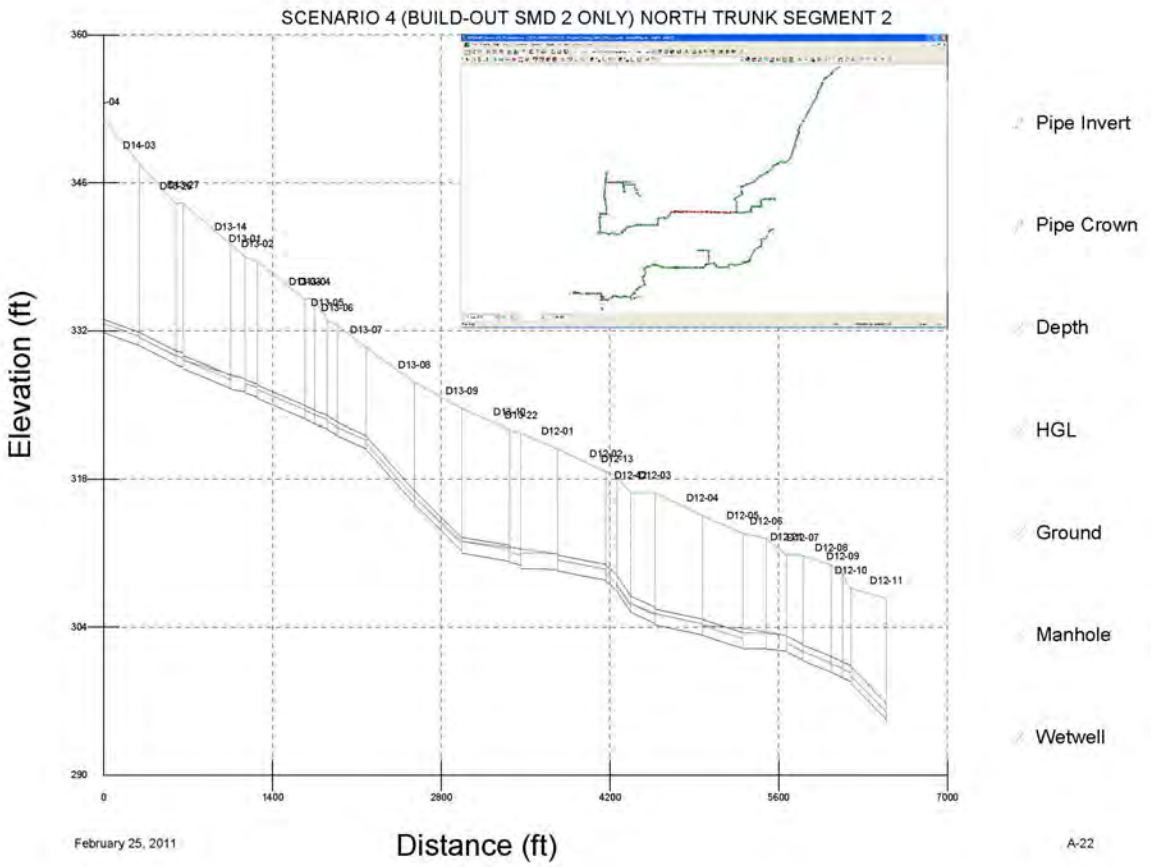

SCENARIO 3 (2010 SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 2
Elevation (ft)
360
346
332
318
304
290
0
1400
2800
4200
5600
7000
Distance (ft)
February 25, 2011
A-17
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

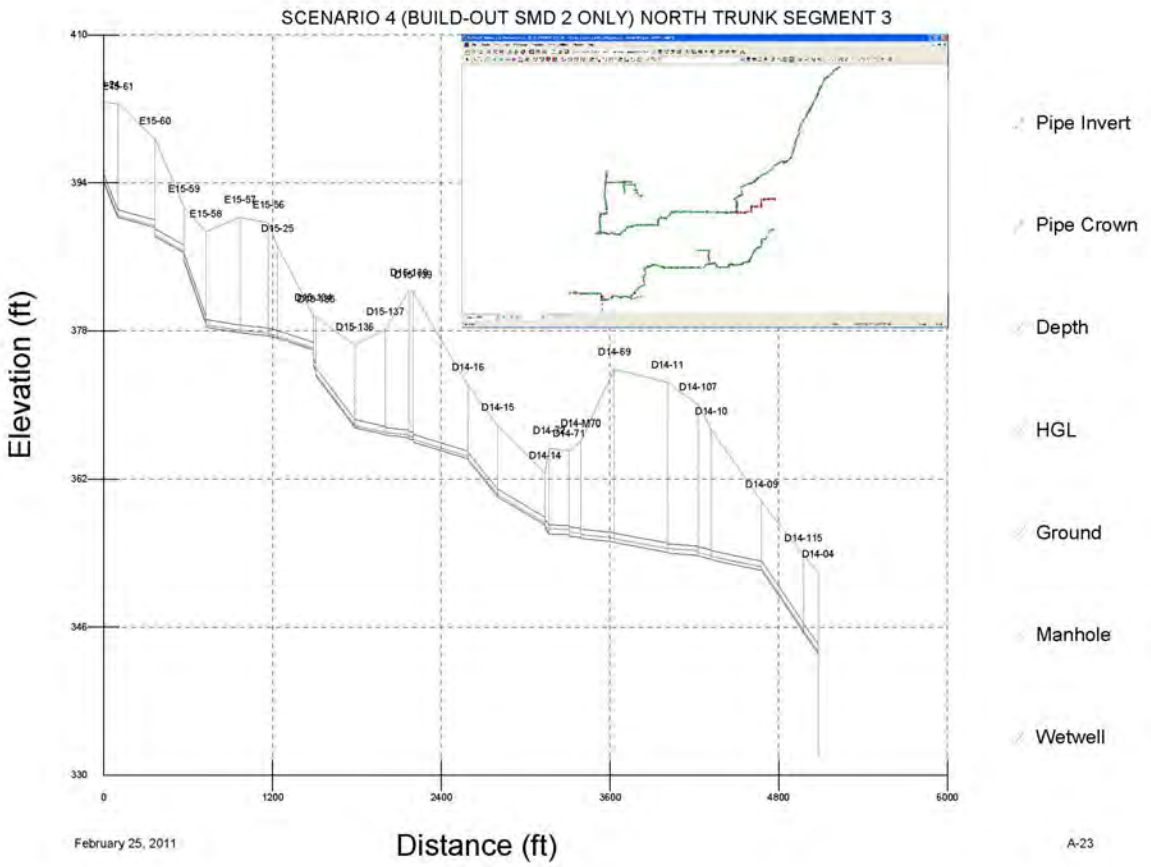

SCENARIO 3 (2010 SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 3
Elevation (ft)
410
394
378
362
346
330
0
1200
2400
3600
4800
6000
Distance (ft)
E15-61
E15-60
E15-59
E15-58
E15-57
E15-56
D15-25
D15-137
D15-136
D14-16
D14-15
D14-69
D14-11
D14-107
D14-10
D14-M70
D14-71
D14-14
D14-09
D14-115
D14-04
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-18

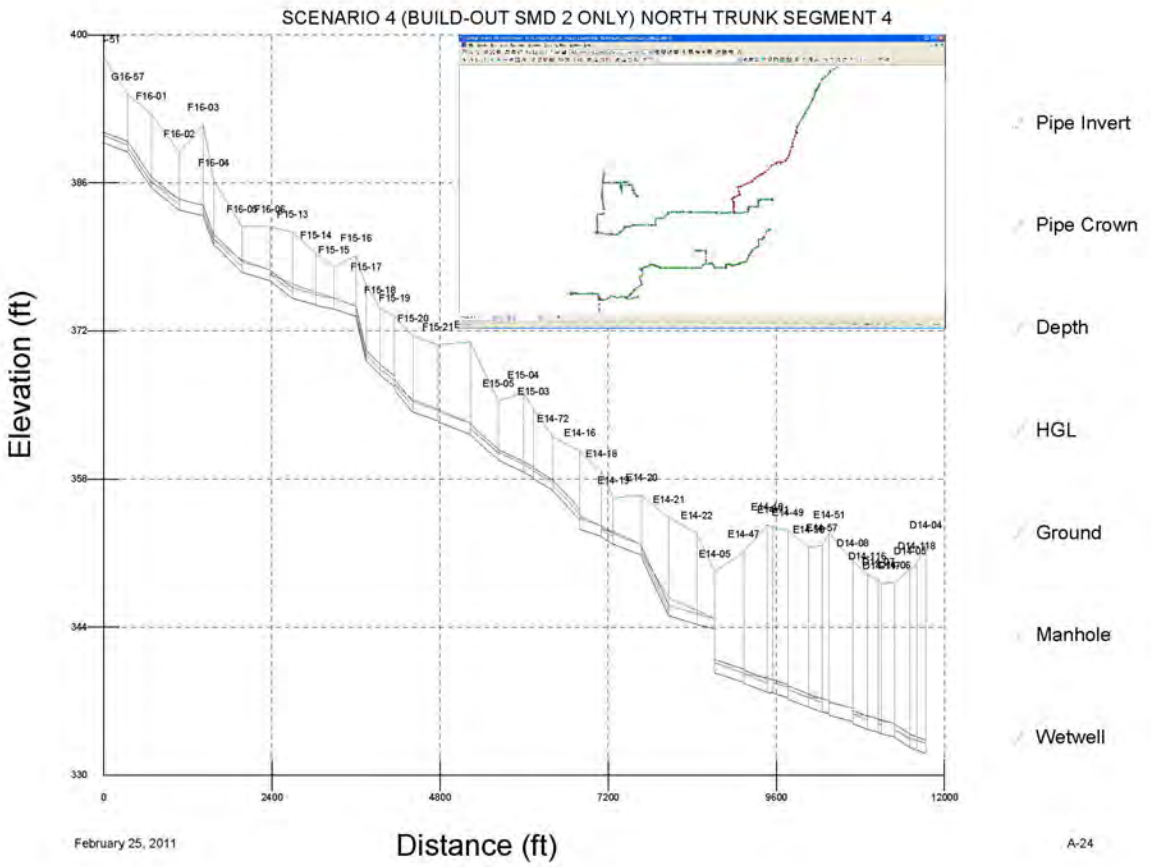

SCENARIO 3 (2010 SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 4
Elevation (ft)
400
386
372
358
344
330
0
2400
4800
7200
9600
12000
Distance (ft)
February 25, 2011
A-19
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

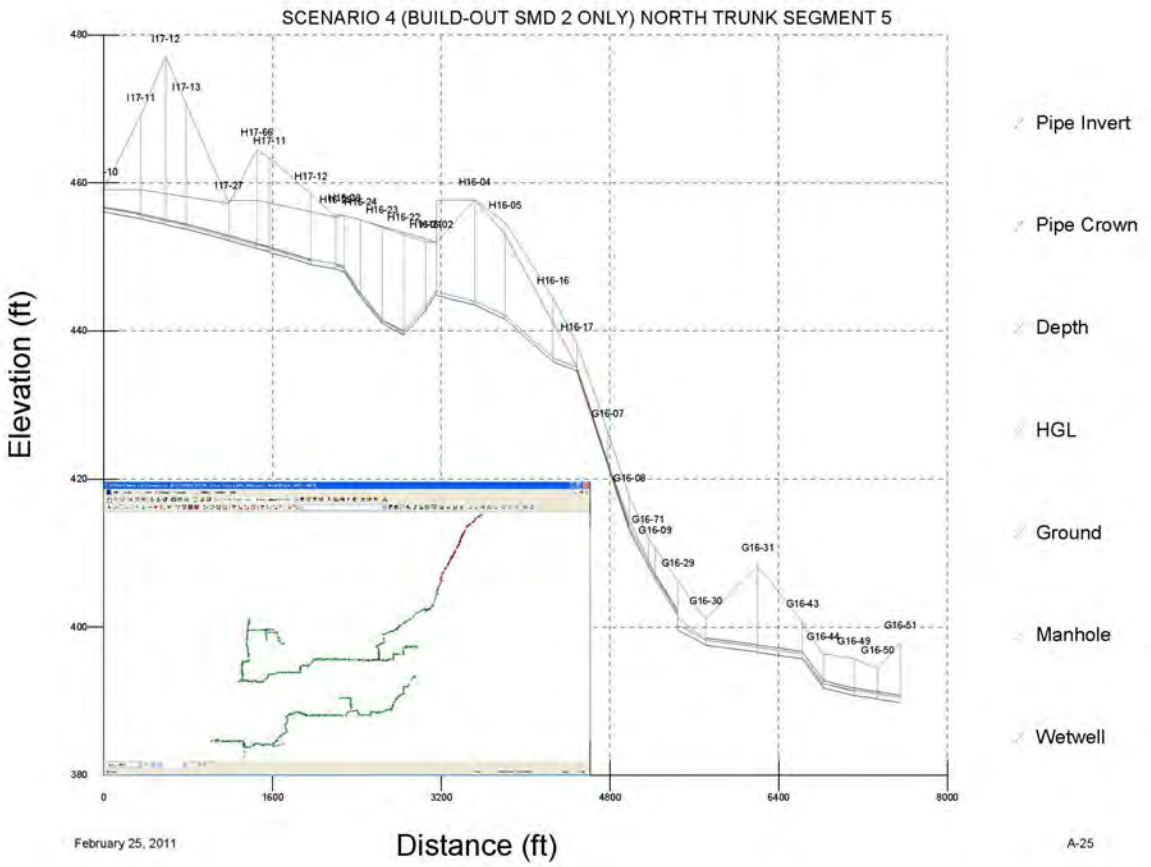

SCENARIO 3 (2010 SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 5
Elevation (ft)
480
460
440
420
400
380
0
1600
3200
4800
6400
8000
Distance (ft)
I17-12
I17-11
I17-13
H17-66
H17-11
-10
I17-27
H17-12
H16-04
H16-05
H16-16
H16-17
G16-07
G16-08
G16-71
G16-09
G16-29
G16-31
G16-30
G16-43
G16-51
G16-44
G16-49
G16-50
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-20

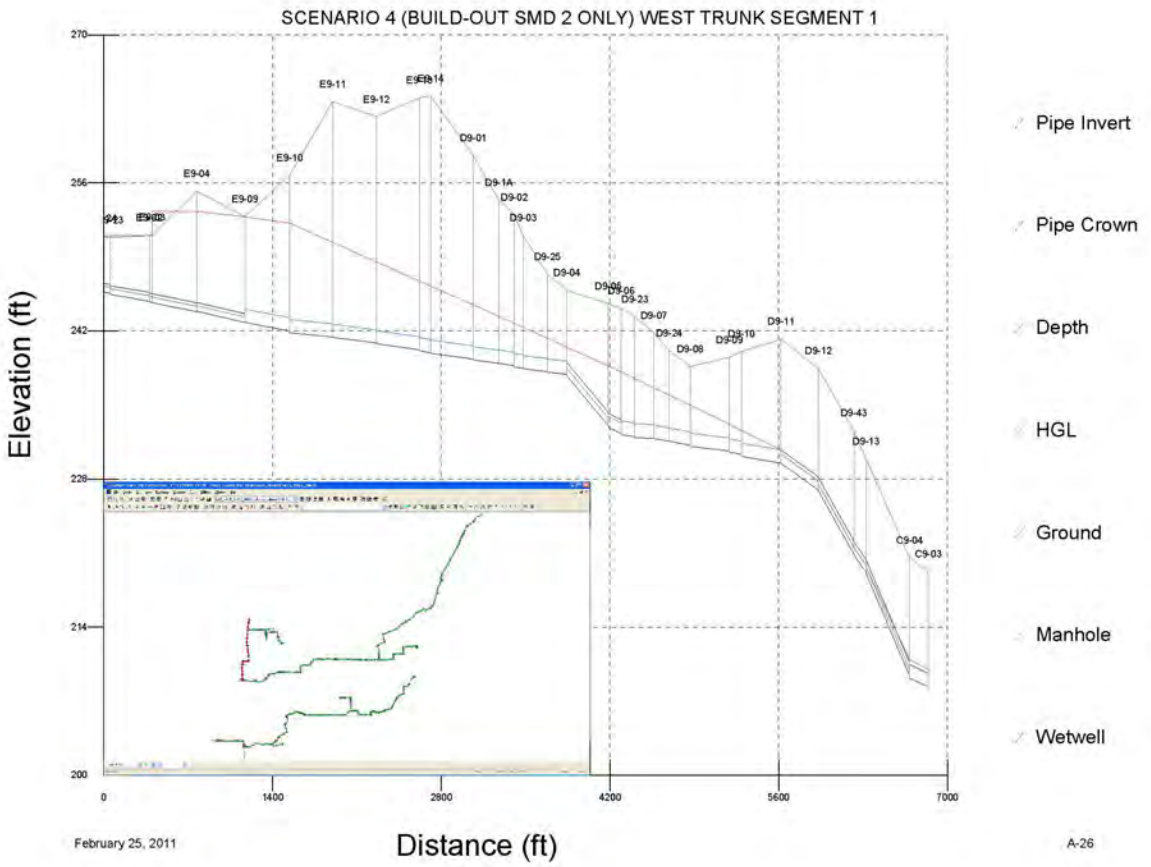

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) NORTH TRUNK SEGMENT 1
Elevation (ft)
310
288
266
244
222
200
0
1800
3600
5400
7200
9000
Distance (ft)
February 25, 2011
A-21
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

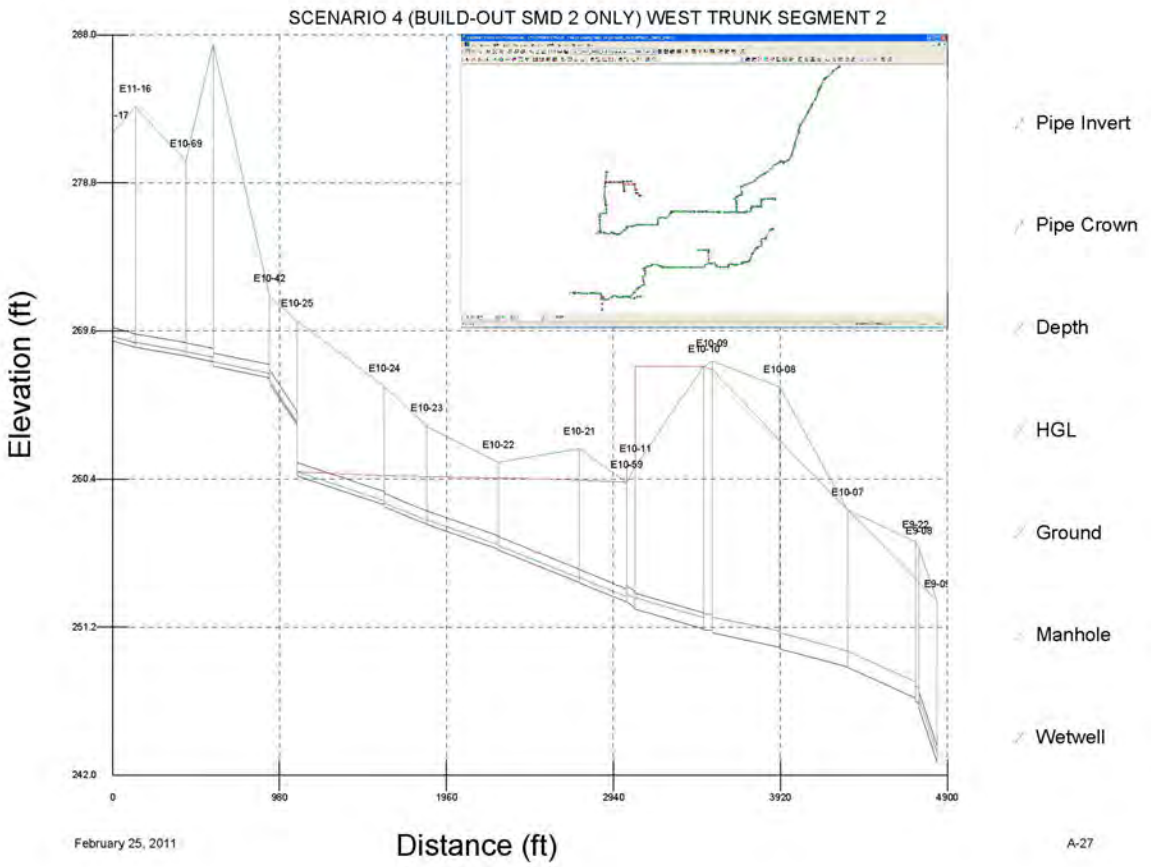

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) NORTH TRUNK SEGMENT 2
Elevation (ft)
360
346
332
318
304
290
0
1400
2800
4200
5600
7000
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-22

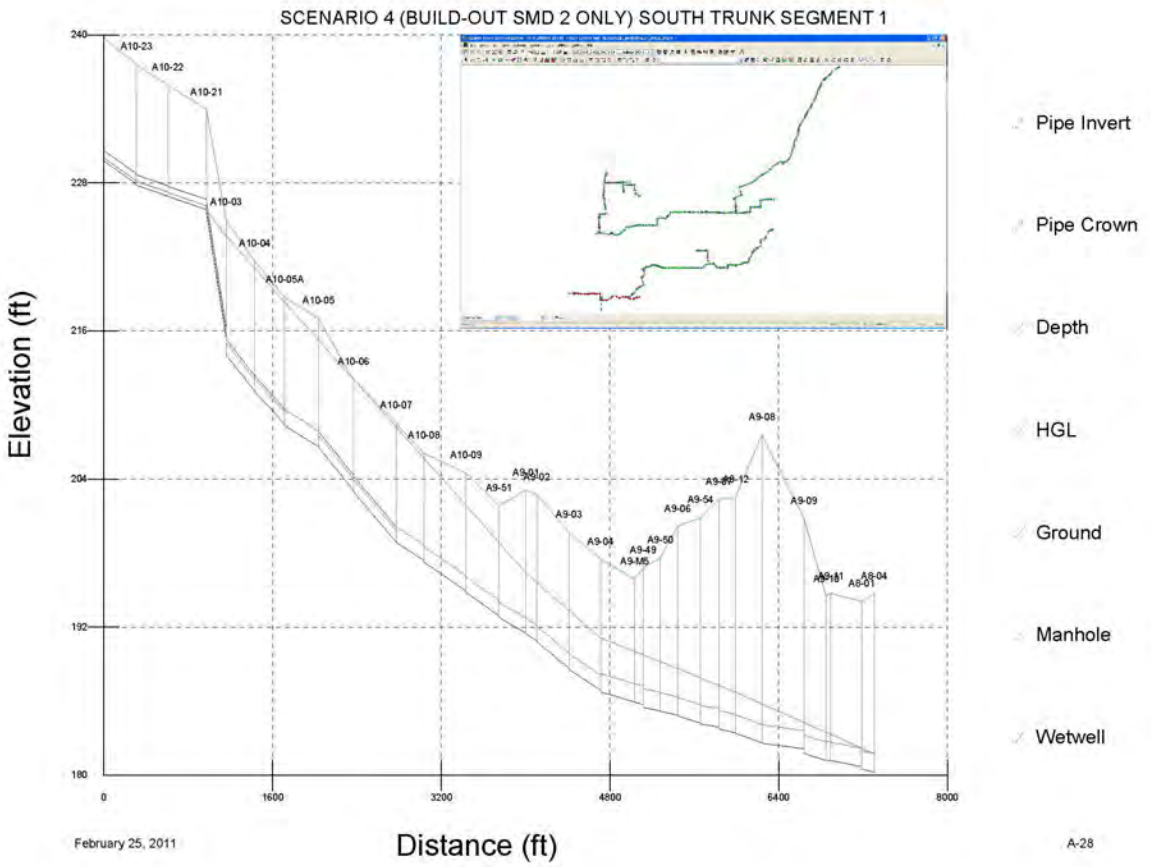

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) NORTH TRUNK SEGMENT 3
Elevation (ft)
410
394
378
362
346
330
0
1200
2400
3600
4800
6000
Distance (ft)
E15-60
E15-59
E15-58
E15-57
E15-56
D15-25
D15-137
D15-136
D14-16
D14-15
D14-69
D14-11
D14-107
D14-10
D14-09
D14-115
D14-04
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-23

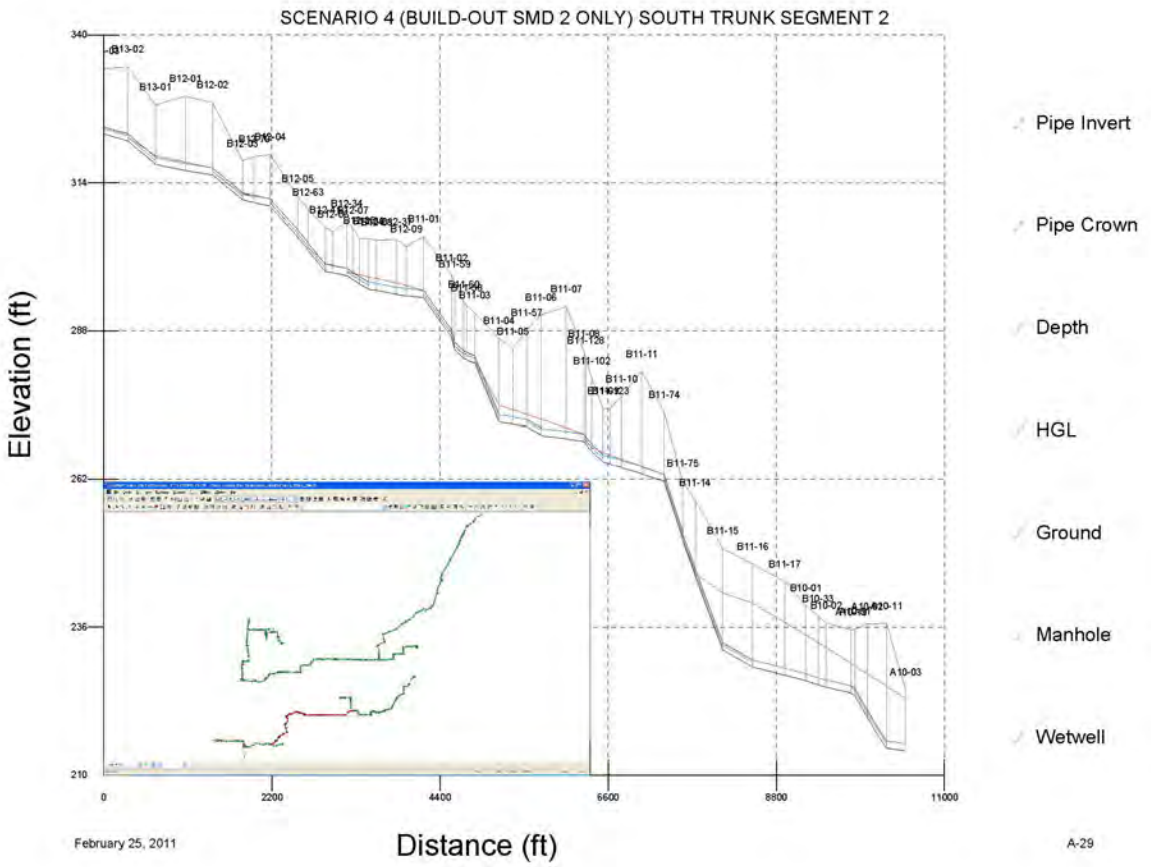

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) NORTH TRUNK SEGMENT 4
Elevation (ft)
400
386
372
358
344
330
0
2400
4800
7200
9600
12000
Distance (ft)
February 25, 2011
A-24
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

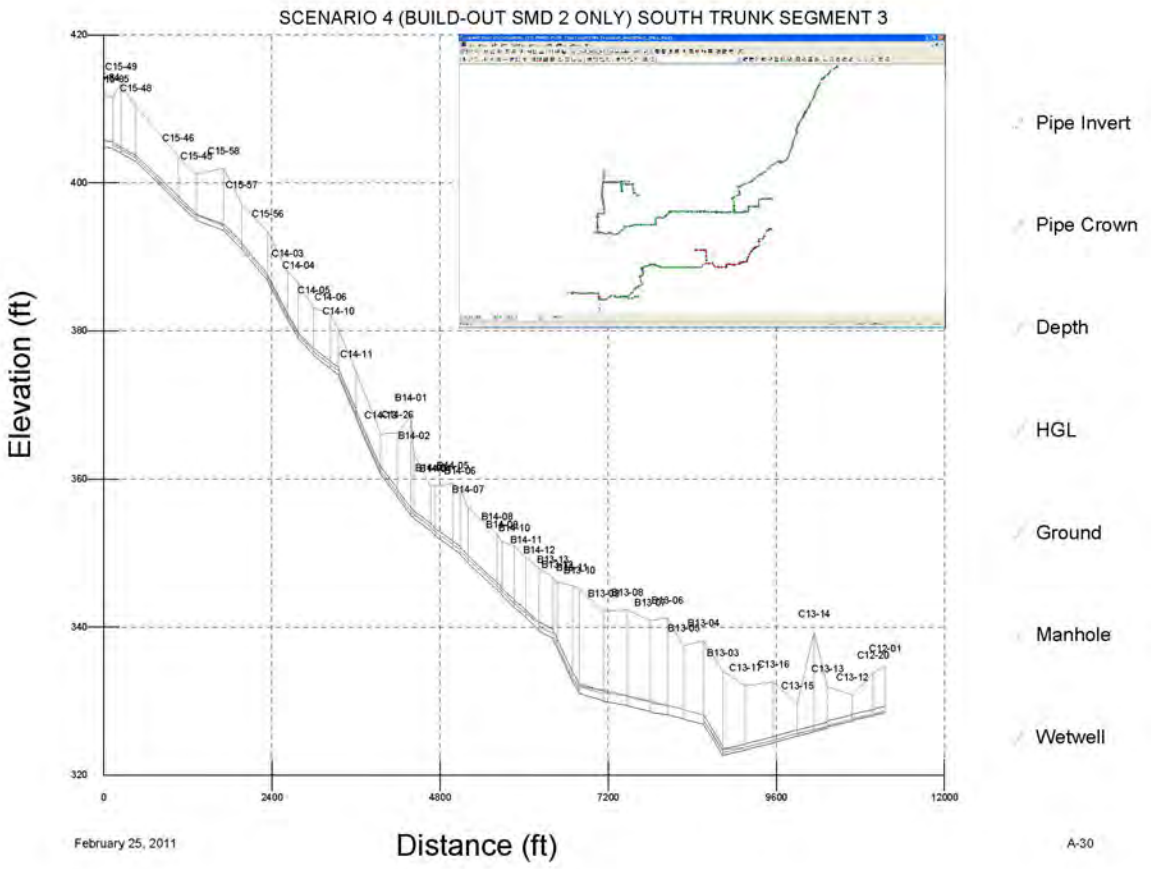

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) NORTH TRUNK SEGMENT 5
Elevation (ft)
480
460
440
420
400
380
0
1600
3200
4800
6400
8000
Distance (ft)
I17-12
I17-11
I17-13
H17-66
H17-11
-10
I17-27
H17-12
H16-04
H16-05
H16-24
H16-23
H16-22
H16-16
H16-17
G16-07
G16-08
G16-71
G16-09
G16-29
G16-31
G16-30
G16-43
G16-44
G16-49
G16-50
G16-51
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-25

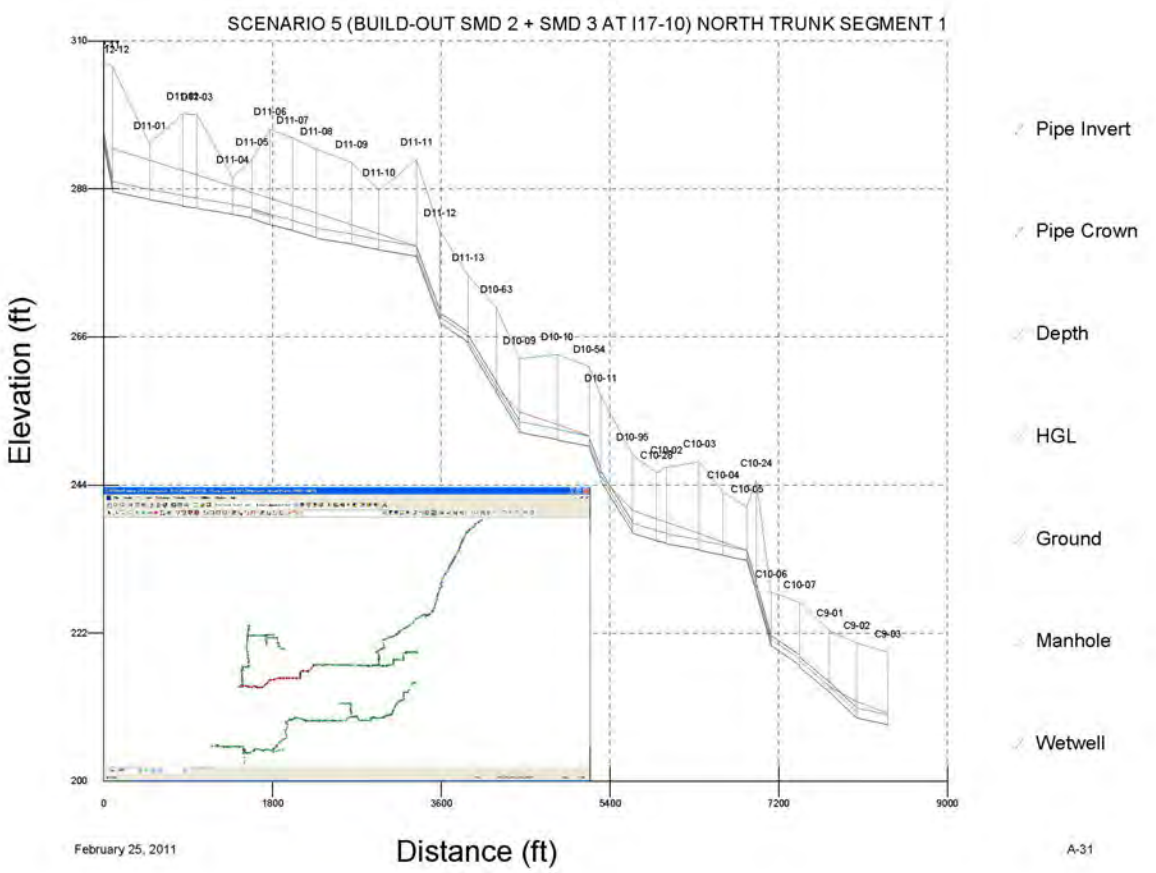

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) WEST TRUNK SEGMENT 1
Elevation (ft)
270
256
242
228
214
200
0
1400
2800
4200
5600
7000
Distance (ft)
February 25, 2011
A-26
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

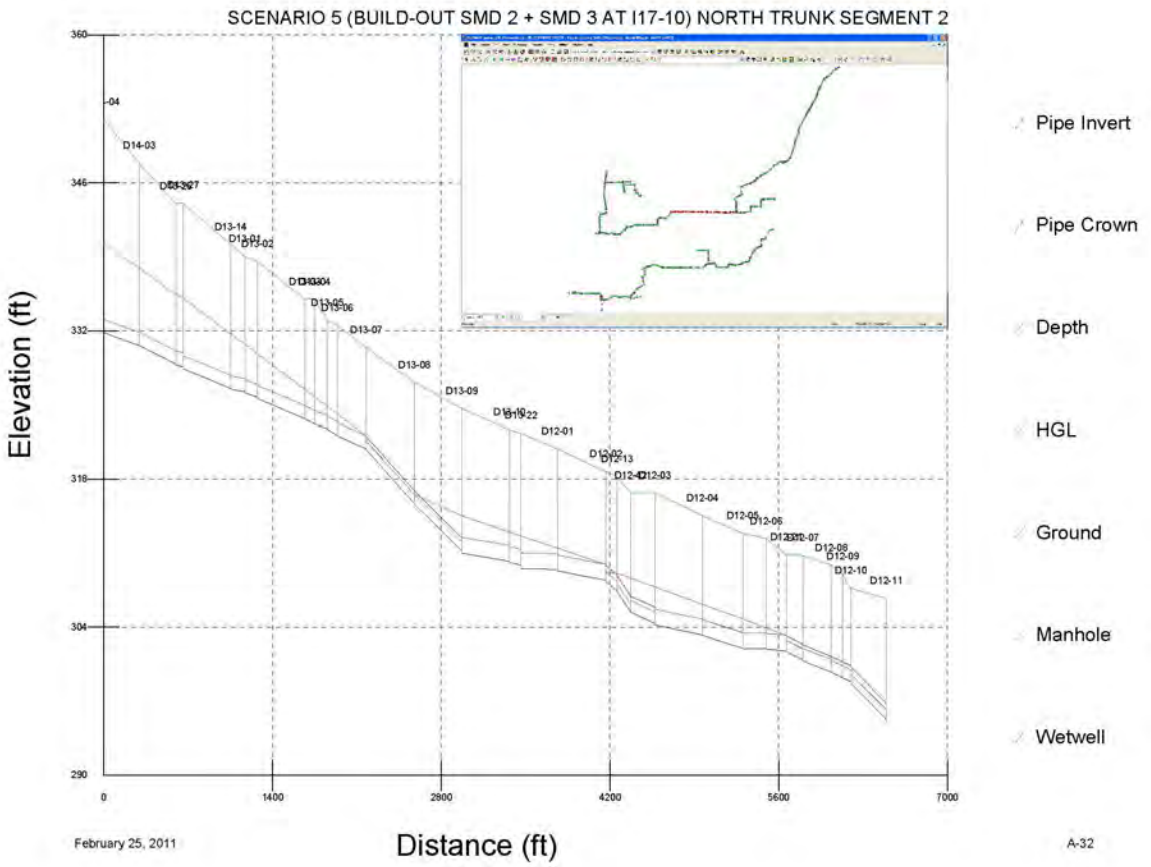

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) WEST TRUNK SEGMENT 2
Elevation (ft)
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-27

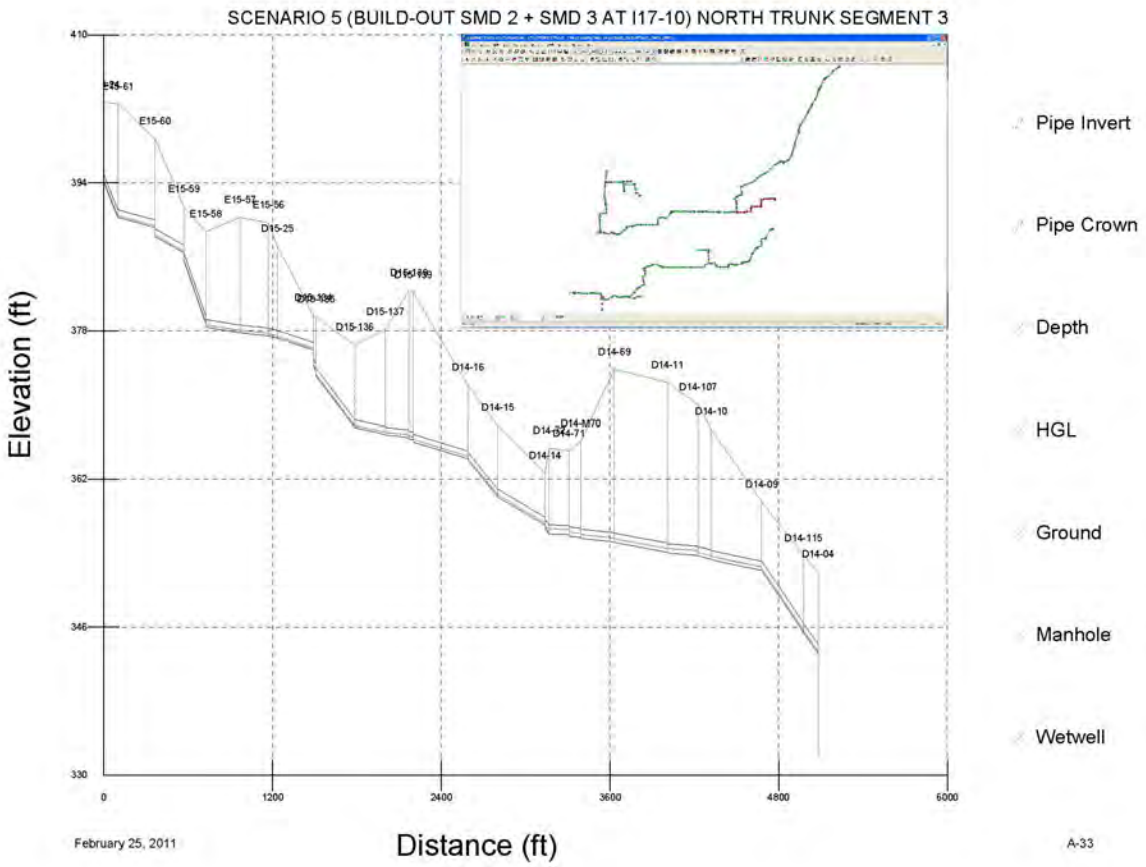

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) SOUTH TRUNK SEGMENT 1
Elevation (ft)
240
228
216
204
192
180
0
1600
3200
4800
6400
8000
Distance (ft)
A10-23
A10-22
A10-21
A10-03
A10-04
A10-05A
A10-05
A10-06
A10-07
A10-08
A10-09
A9-51
A9-03
A9-04
A9-49
A9-M5
A9-50
A9-06
A9-54
A9-08
A9-09
A8-01
A8-04
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-28

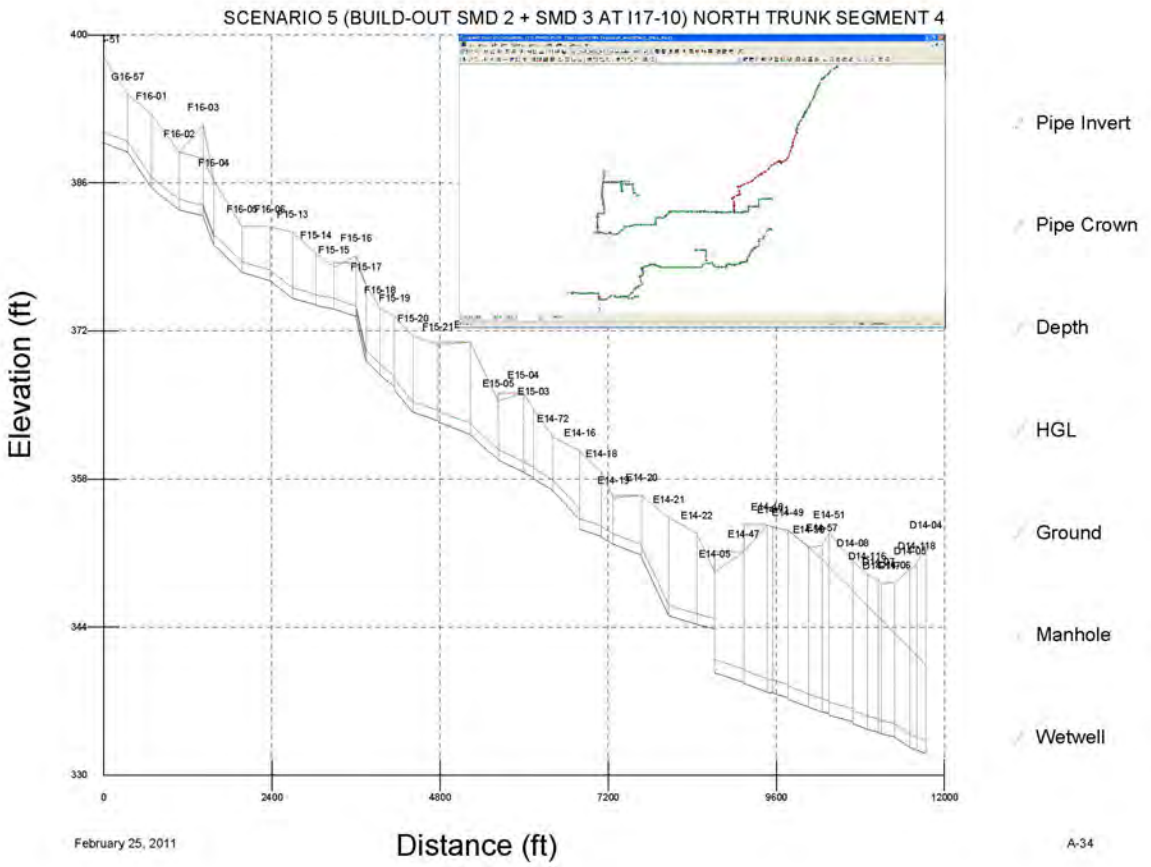

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) SOUTH TRUNK SEGMENT 2
Elevation (ft)
340
314
288
262
236
210
0
2200
4400
6600
8800
11000
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-29

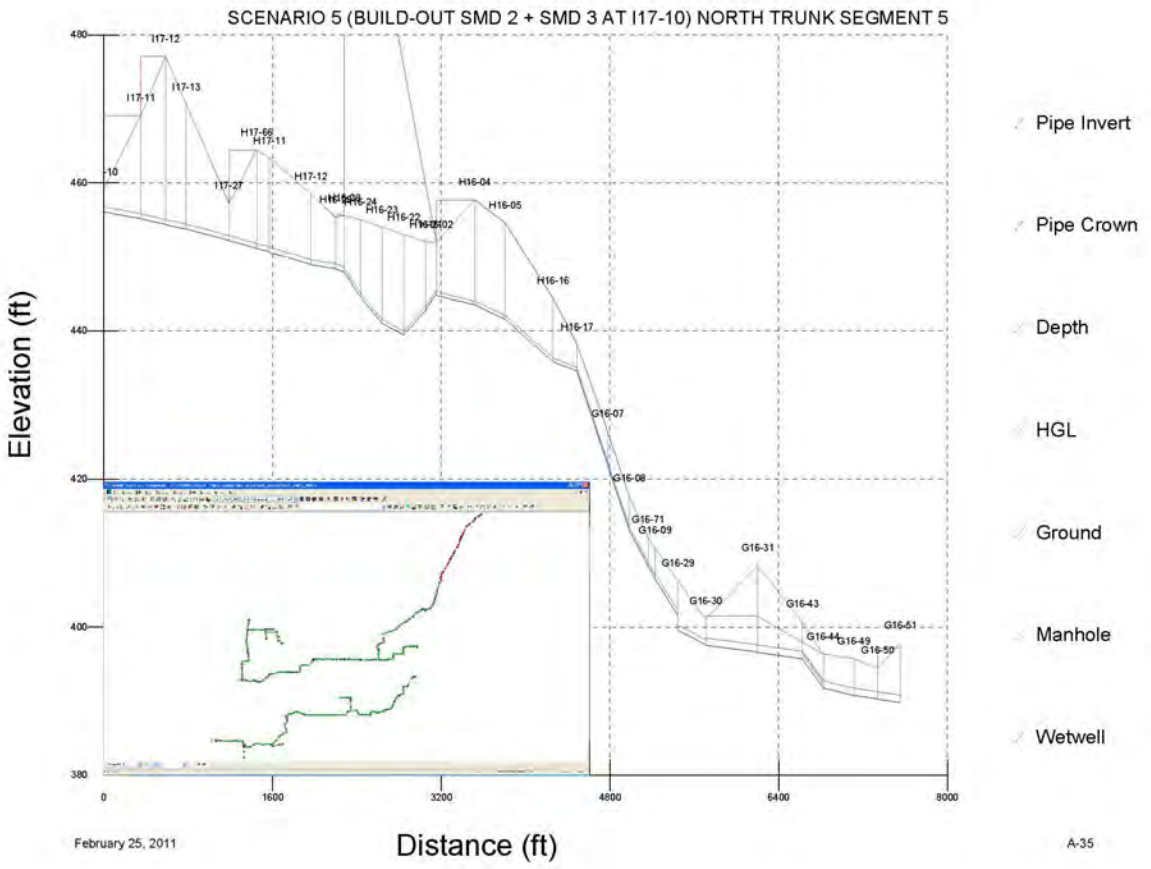

SCENARIO 4 (BUILD-OUT SMD 2 ONLY) SOUTH TRUNK SEGMENT 3
Elevation (ft)
420
400
380
360
340
320
0
2400
4800
7200
9600
12000
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-30

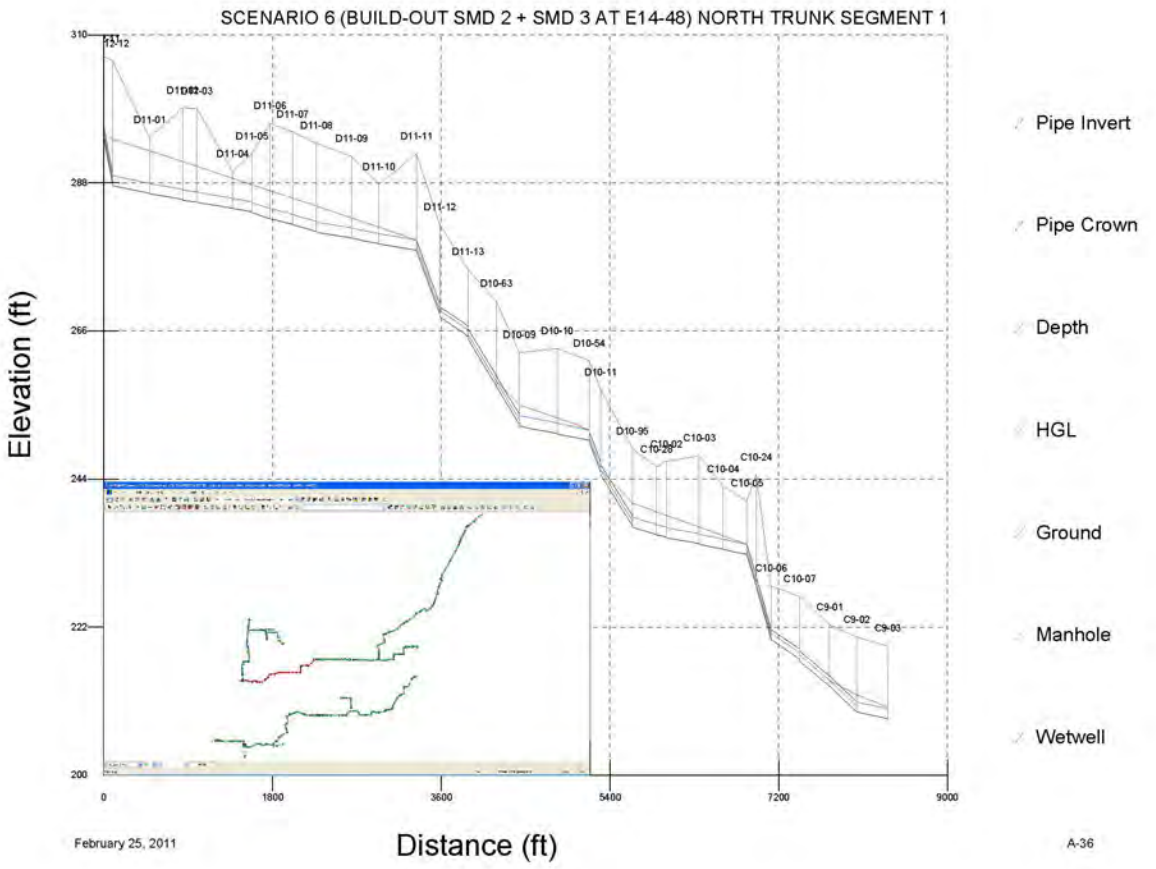

SCENARIO 5 (BUILD-OUT SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 1
Elevation (ft)
310
288
266
244
222
200
0
1800
3600
5400
7200
9000
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-31

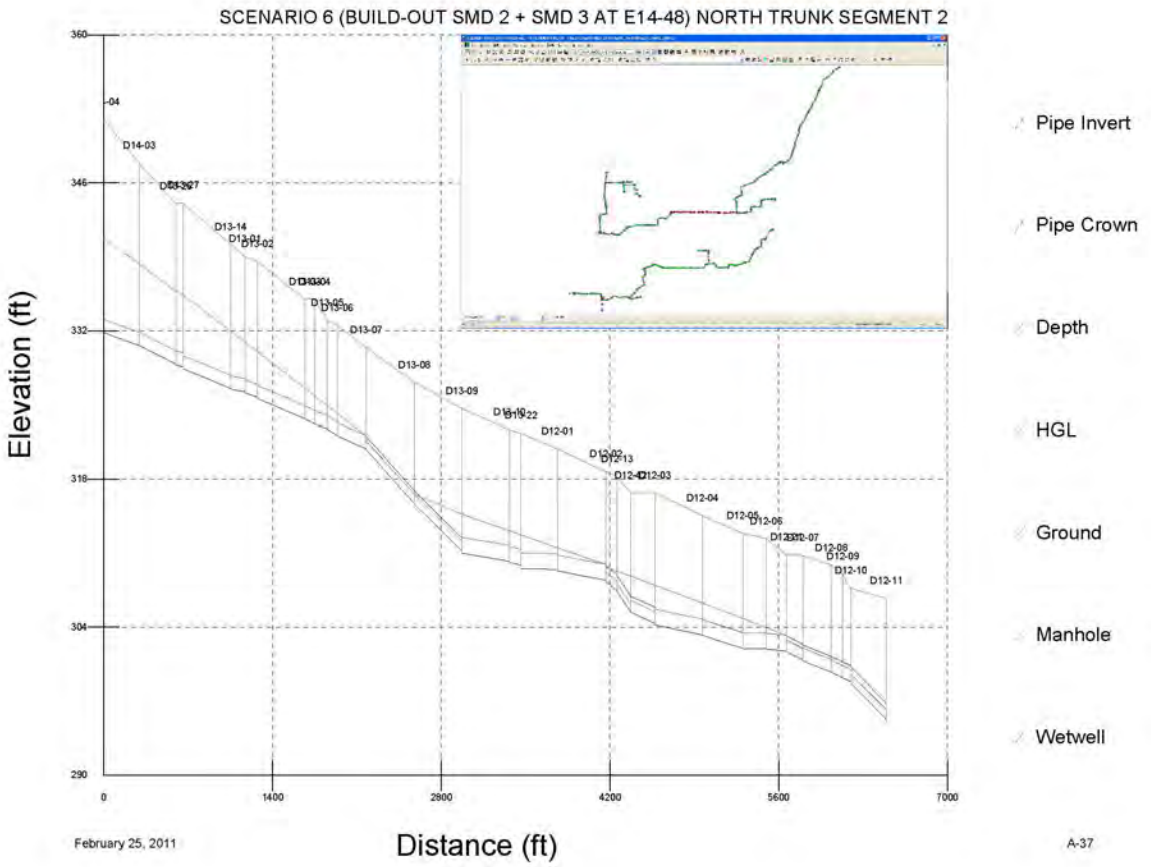

SCENARIO 5 (BUILD-OUT SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 2
Elevation (ft)
360
346
332
318
304
290
0
1400
2800
4200
5600
7000
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-32

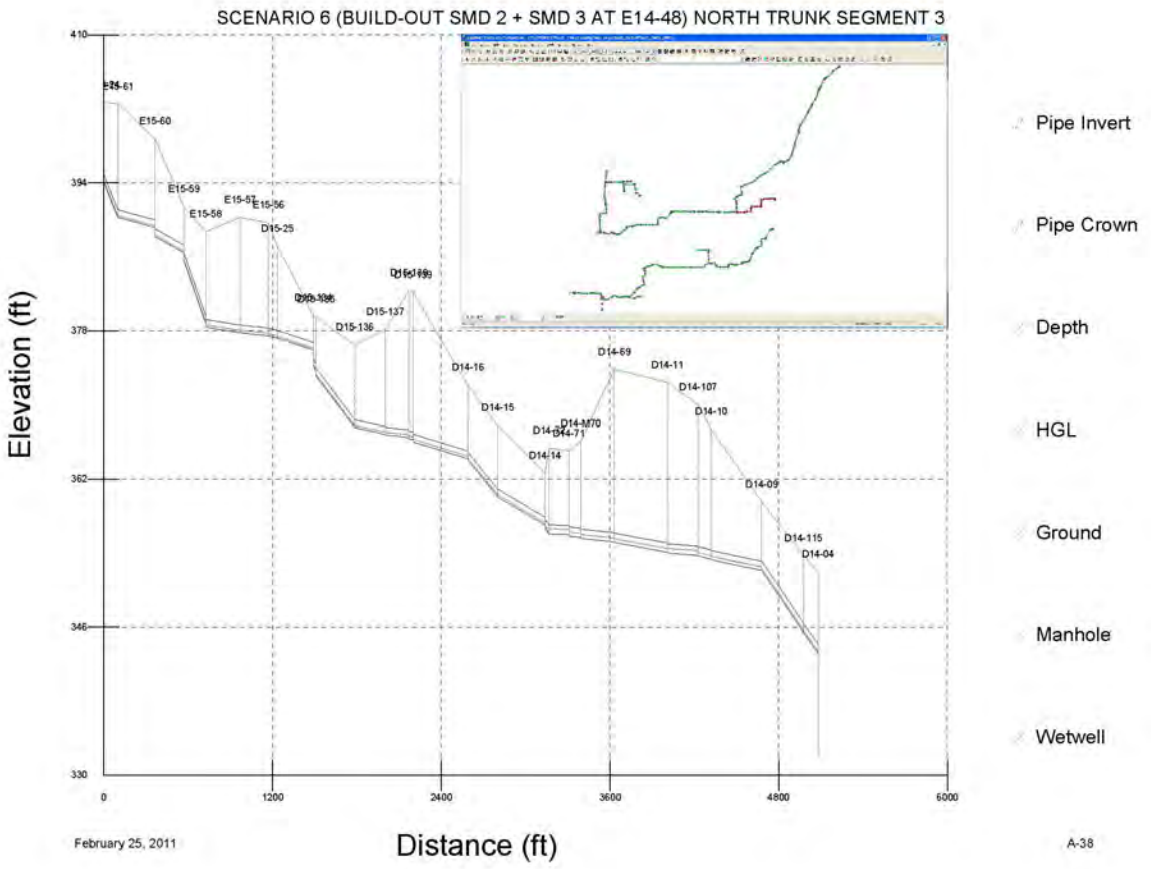

SCENARIO 5 (BUILD-OUT SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 3
Elevation (ft)
410
394
378
362
346
330
0
1200
2400
3600
4800
6000
Distance (ft)
E15-61
E15-60
E15-59
E15-58
E15-57
E15-56
D15-25
D15-137
D15-136
D14-16
D14-15
D14-69
D14-11
D14-107
D14-10
D14-09
D14-115
D14-04
D14-14
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-33

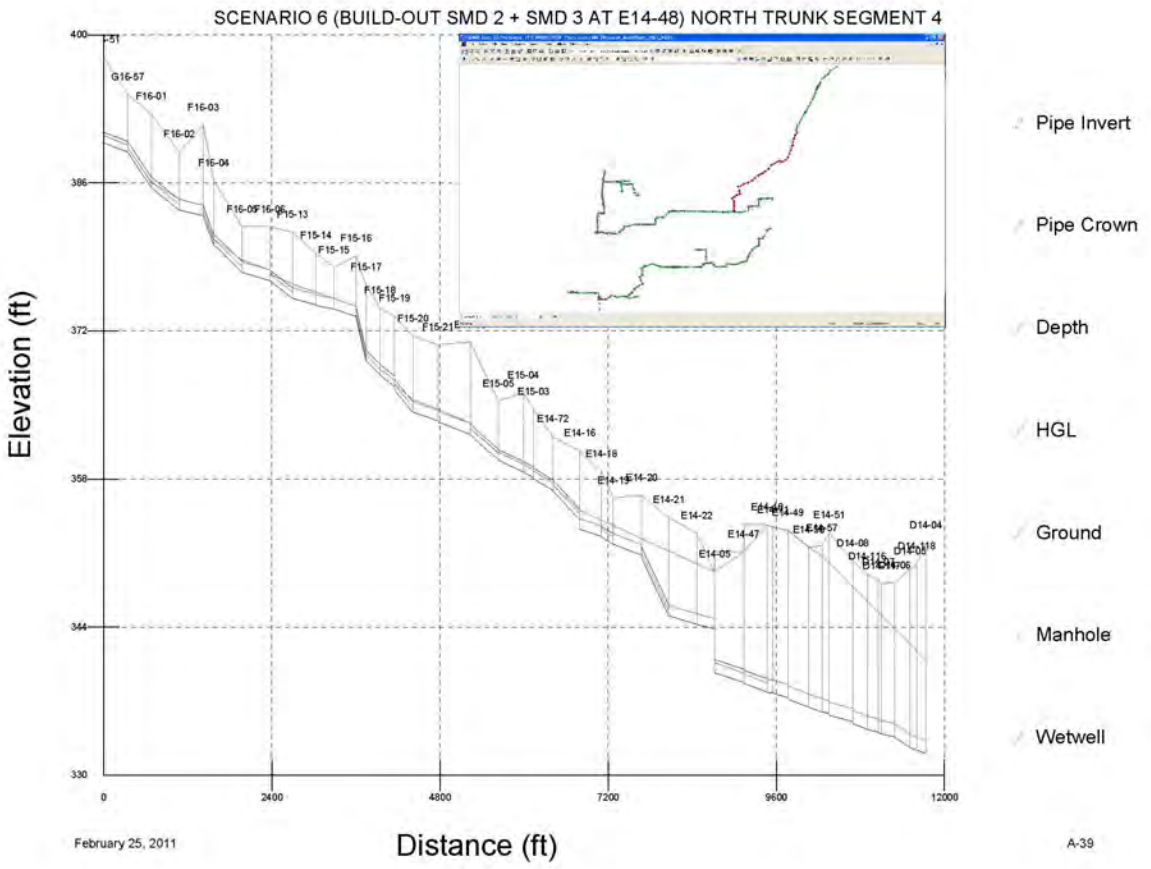

SCENARIO 5 (BUILD-OUT SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 4
Elevation (ft)
400
386
372
358
344
330
0
2400
4800
7200
9600
12000
Distance (ft)
February 25, 2011
A-34
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

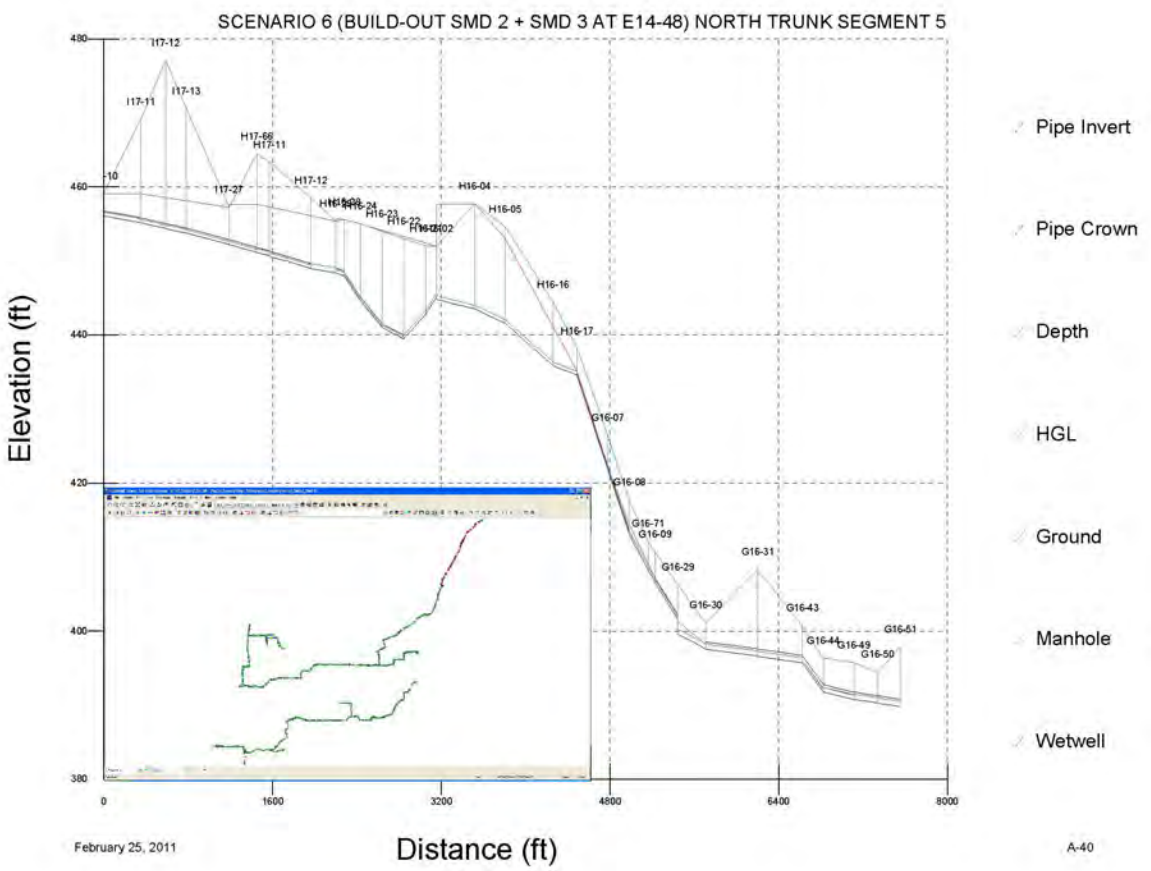

SCENARIO 5 (BUILD-OUT SMD 2 + SMD 3 AT I17-10) NORTH TRUNK SEGMENT 5
Elevation (ft)
480
460
440
420
400
380
0
1600
3200
4800
6400
8000
Distance (ft)
I17-12
I17-11
I17-13
H17-66
H17-11
I17-10
I17-27
H17-12
H16-04
H16-05
H16-16
H16-17
G16-07
G16-08
G16-71
G16-09
G16-29
G16-31
G16-30
G16-43
G16-44
G16-49
G16-50
G16-51
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-35

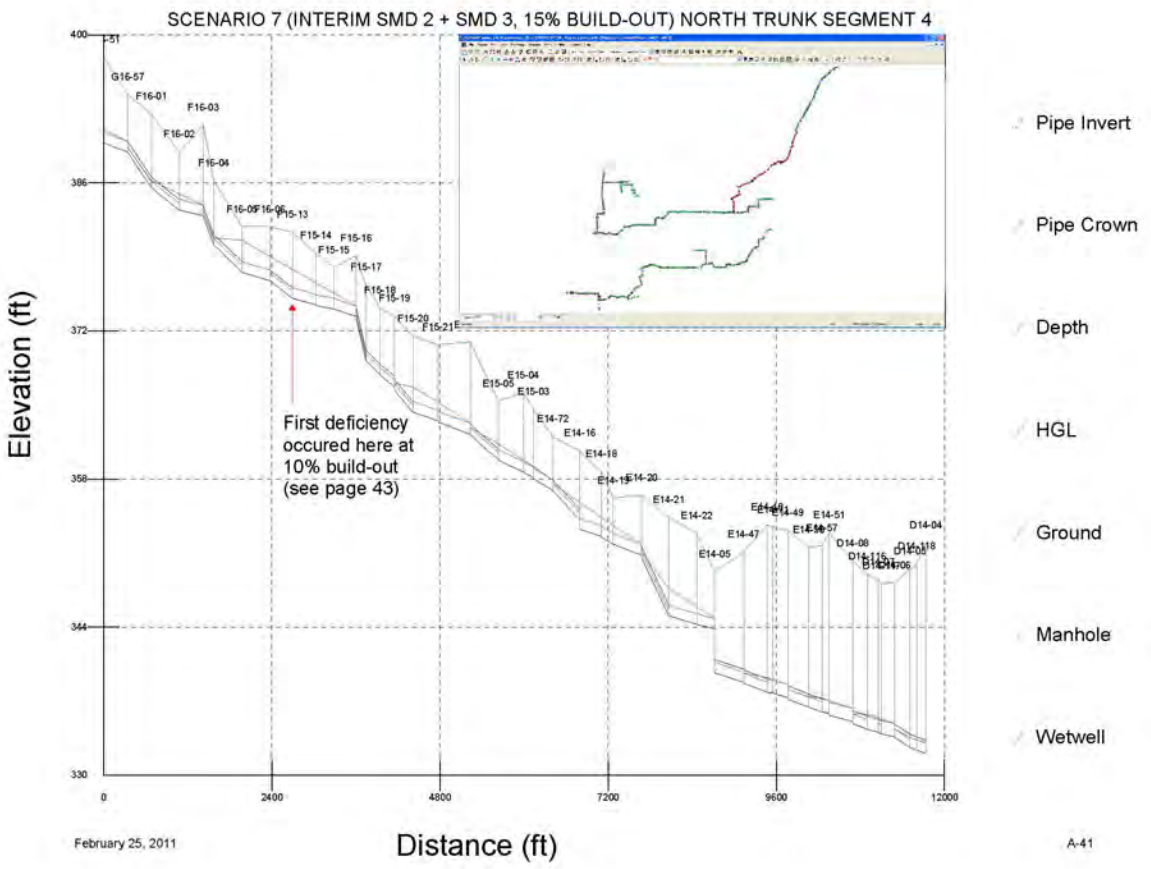

SCENARIO 6 (BUILD-OUT SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 1
Elevation (ft)
310
288
266
244
222
200
0
1800
3600
5400
7200
9000
Distance (ft)
February 25, 2011
A-36
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

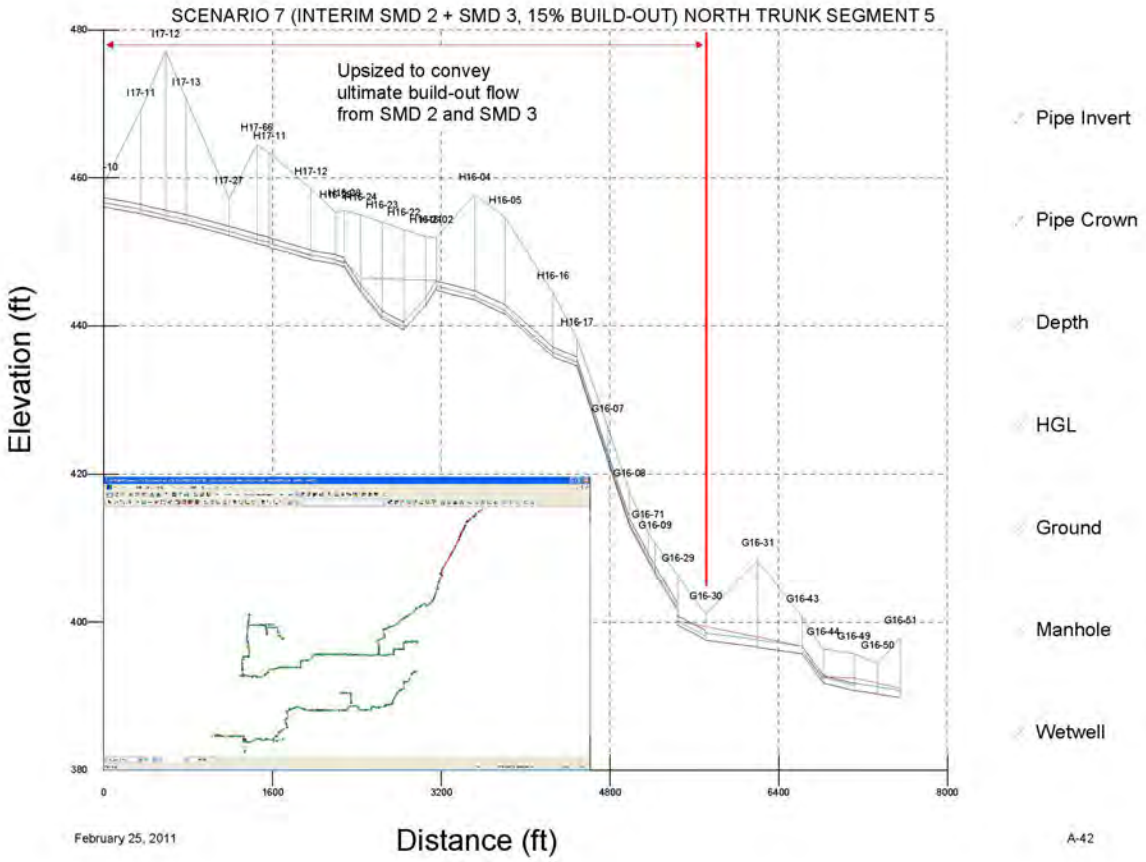

SCENARIO 6 (BUILD-OUT SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 2
Elevation (ft)
360
346
332
318
304
290
0
1400
2800
4200
5600
7000
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-37

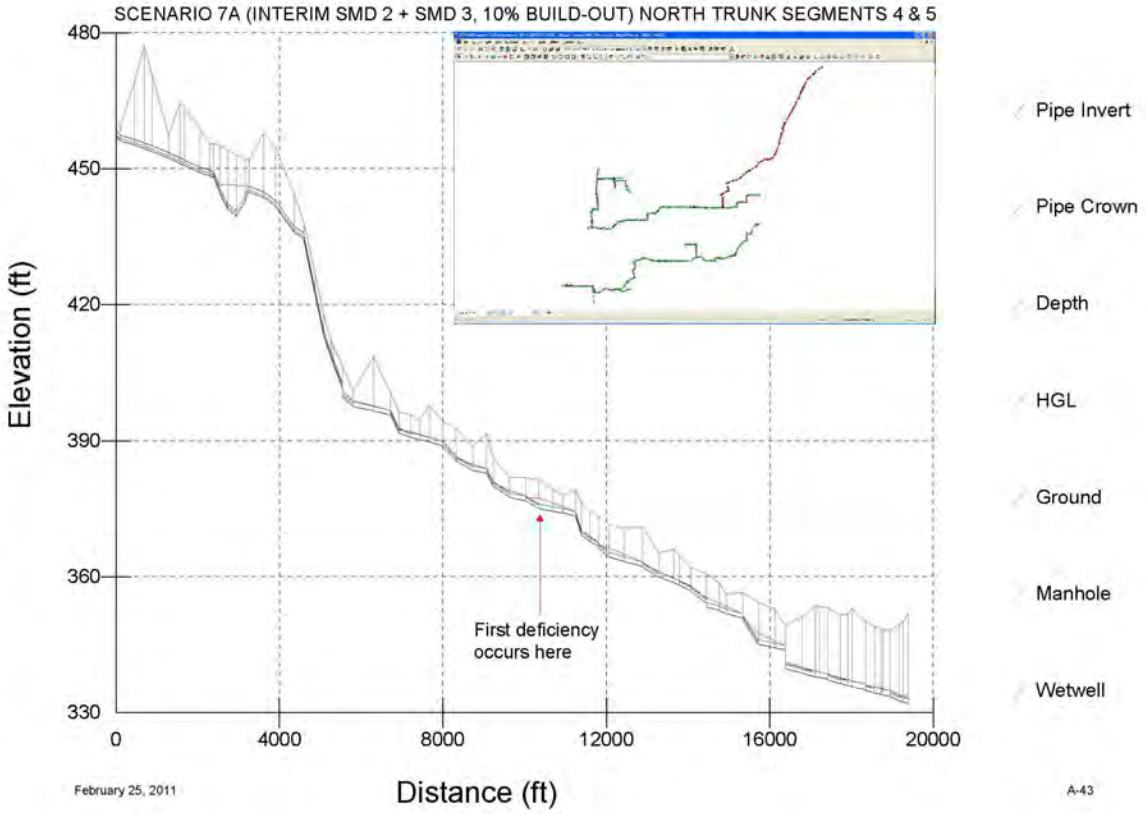

SCENARIO 6 (BUILD-OUT SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 3
Elevation (ft)
410
394
378
362
346
330
0
1200
2400
3600
4800
6000
Distance (ft)
E15-61
E15-60
E15-59
E15-58
E15-57
E15-56
D15-25
D15-137
D15-136
D14-16
D14-15
D14-69
D14-11
D14-107
D14-10
D14-09
D14-115
D14-04
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-38

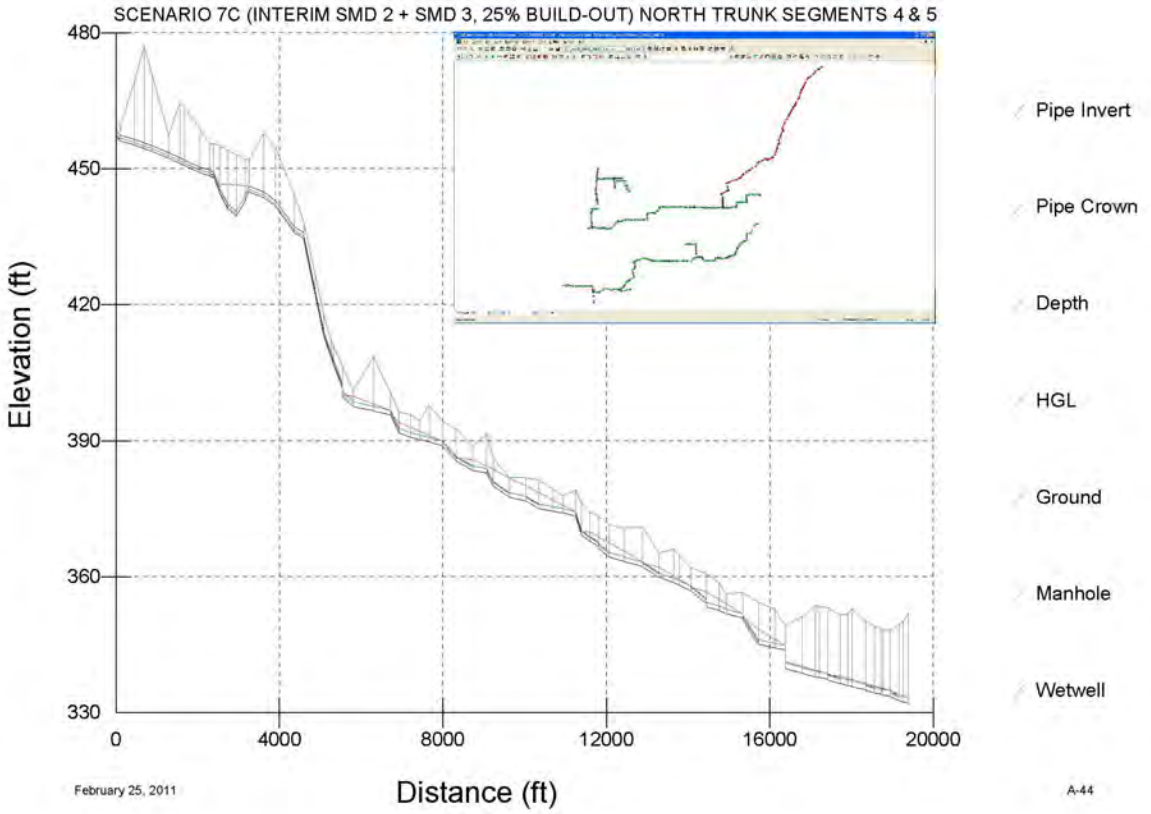

SCENARIO 6 (BUILD-OUT SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 4
Elevation (ft)
400
386
372
358
344
330
0
2400
4800
7200
9600
12000
Distance (ft)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-39


SCENARIO 6 (BUILD-OUT SMD 2 + SMD 3 AT E14-48) NORTH TRUNK SEGMENT 5
Elevation (ft)
480
460
440
420
400
380
0
1600
3200
4800
6400
8000
Distance (ft)
I17-12
I17-11
I17-13
H17-66
H17-11
I17-27
H17-12
H16-04
H16-05
H16-16
H16-17
G16-07
G16-08
G16-71
G16-09
G16-29
G16-31
G16-30
G16-43
G16-44
G16-49
G16-50
G16-51
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-40


SCENARIO 7 (INTERIM SMD 2 + SMD 3, 15% BUILD-OUT) NORTH TRUNK SEGMENT 4
Elevation (ft)
400
386
372
358
344
330
0
2400
4800
7200
9600
12000
Distance (ft)
First deficiency occured here at 10% build-out (see page 43)
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-41


SCENARIO 7 (INTERIM SMD 2 + SMD 3, 15% BUILD-OUT) NORTH TRUNK SEGMENT 5
Upsized to convey
ultimate build-out flow
from SMD 2 and SMD 3
Elevation (ft)
480
460
440
420
400
380
0
1600
3200
4800
6400
8000
Distance (ft)
February 25, 2011
A-42
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell


SCENARIO 7A (INTERIM SMD 2 + SMD 3, 10% BUILD-OUT) NORTH TRUNK SEGMENTS 4 & 5
Elevation (ft)
480
450
420
390
360
330
0
4000
8000
12000
16000
20000
Distance (ft)
First deficiency occurs here
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell
February 25, 2011
A-43


SCENARIO 7C (INTERIM SMD 2 + SMD 3, 25% BUILD-OUT) NORTH TRUNK SEGMENTS 4 & 5
Elevation (ft)
480
450
420
390
360
330
0
4000
8000
12000
16000
20000
Distance (ft)
February 25, 2011
A-44
Pipe Invert
Pipe Crown
Depth
HGL
Ground
Manhole
Wetwell

Attachment B: Recommendations

Model Analysis Results and Pipe Upsizing Summary by Scenario

Existing System					1		2		3		4		5		6		7a (10 percent)		7b (15 percent)	
Pipe_ID	Trunk	Length	Diameter	Slope	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)
C9-03	NORTH	49	21	0.0034	2.95		3.46		3.55		6.50		8.05		8.19		3.92		4.14	
C9-02	NORTH	331	18	0.0050	1.94		2.48		2.48		3.46		5.10		5.09		2.74		2.86	
C9-01	NORTH	286	18	0.0130	1.94		2.48		2.48		3.46		5.10		5.09		2.74		2.86	
C10-07	NORTH	320	18	0.0118	1.94		2.48		2.48		3.46		5.07		5.06		2.74		2.86	
C10-06	NORTH	307	18	0.0095	1.94		2.48		2.50		3.46		5.07		5.06		2.74		2.86	
C10-24	NORTH	157	18	0.0481	1.84		2.48		2.50		3.46		5.07		5.06		2.74		2.86	
C10-05	NORTH	97	18	0.0469	1.79		2.33		2.36		3.24		4.85		4.83		2.58		2.70	
C10-04	NORTH	253	18	0.0031	1.79		2.33		2.34		3.24		4.85	21	4.83	21	2.58		2.70	
C10-03	NORTH	256	18	0.0026	1.79		2.33		2.34		3.24		4.85	21	4.83	21	2.58		2.70	
C10-02	NORTH	354	18	0.0039	1.79		2.33		2.34		3.23		4.85	21	4.83	21	2.58		2.70	
C10-29	NORTH	103	18	0.0035	1.79		2.33		2.34		3.23		4.85		4.83		2.58		2.70	
D10-45	NORTH	354	18	0.0041	1.78		2.32		2.34		3.21		4.83		4.81		2.58		2.70	
D10-11	NORTH	345	18	0.0034	1.78		2.33		2.34		3.21		4.83		4.81		2.58		2.70	
D10-56	NORTH	123	18	0.0071	1.78		2.33		2.34		3.21		4.83		4.81		2.58		2.70	
D10-10	NORTH	341	18	0.0026	1.78		2.33		2.34		3.21		4.83	21	4.81	21	2.58		2.70	
D10-09	NORTH	402	18	0.0025	1.78		2.33		2.34		3.15		4.77	21	4.75	21	2.57		2.69	
D10-63	NORTH	245	18	0.0231	1.78		2.33		2.36		3.15		4.77		4.75		2.58		2.69	
D11-13	NORTH	302	18	0.0231	1.78		2.33		2.34		3.15		4.77		4.75		2.58		2.68	
D11-12	NORTH	304	18	0.0095	1.79		2.33		2.34		3.15		4.77		4.75		2.58		2.70	
D11-11	NORTH	247	18	0.0393	1.77		2.32		2.33		3.10		4.71		4.69		2.56		2.68	
D11-10	NORTH	398	18	0.0023	1.77		2.32		2.33		3.10		4.71	21	4.69	21	2.56		2.68	
D11-09	NORTH	293	18	0.0028	1.76		2.31		2.32		3.08		4.70	21	4.68	21	2.55		2.67	
D11-08	NORTH	377	18	0.0021	1.76		2.31		2.32		3.08		4.70	21	4.68	21	2.55		2.67	
D11-07	NORTH	250	18	0.0040	1.76		2.31		2.32		3.05		4.67	21	4.65	21	2.55		2.66	
D11-06	NORTH	241	18	0.0034	1.76		2.31		2.33		3.05		4.67	21	4.66	21	2.55		2.66	
D11-05	NORTH	195	18	0.0046	1.76		2.31		2.33		3.05		4.68	21	4.66	21	2.55		2.67	
D11-04	NORTH	204	18	0.0025	1.76		2.31		2.32		3.03		4.66	21	4.64	21	2.54		2.66	
D11-03	NORTH	385	18	0.0023	1.76		2.31		2.32		3.03		4.67	21	4.65	21	2.55		2.66	
D11-02	NORTH	148	18	0.0018	1.76		2.31		2.32		3.04		4.67	21	4.66	21	2.55		2.66	
D11-01	NORTH	353	18	0.0023	1.75		2.29		2.31		2.99		4.63	21	4.61	21	2.53		2.64	
D12-12	NORTH	393	18	0.0030	1.75		2.29		2.31		2.99		4.63	21	4.62	21	2.53		2.64	
D12-11	NORTH	98	18	0.0210	1.75		2.29		2.31		2.99		4.63		4.62		2.53		2.64	
D12-10	NORTH	294	18	0.0115	1.75		2.29		2.31		2.99		4.63		4.62		2.53		2.64	
D12-08	NORTH	66	18	0.0052	1.74		2.28		2.29		2.94		4.58		4.56		2.51		2.62	
D12-08	NORTH	95	18	0.0064	1.74		2.28		2.29		2.94		4.58		4.56		2.51		2.62	
D12-07	NORTH	236	18	0.0046	1.74		2.28		2.29		2.94		4.58		4.56		2.51		2.62	
D12-23	NORTH	139	18	0.0060	1.74		2.28		2.30		2.95		4.58		4.57		2.51		2.62	
D12-06	NORTH	164	18	0.0310	1.72		2.26		2.28		2.86		4.54	21	4.52	21	2.48		2.60	
D12-05	NORTH	197	18	0.0103	1.73		2.26		2.28		2.89		4.54	21	4.52	21	2.49		2.60	
D12-04	NORTH	333	18	0.0037	1.72		2.26		2.28		2.90		4.56	21	4.57	21	2.49		2.60	
D12-03	NORTH	395	18	0.0024	1.71		2.25		2.27		2.83		4.48	21	4.46	21	2.48		2.58	
D12-42	NORTH	203	18	0.0093	1.70		2.25		2.27		2.82		4.46		4.44		2.47		2.58	
D12-13	NORTH	113	18	0.0171	1.69		2.24		2.25		2.76		4.41		4.39		2.46		2.56	
D13-02	NORTH	92	18	0.0093	1.68		2.21		2.23		2.68		4.33		4.31		2.42		2.52	
D12-01	NORTH	301	18	0.0023	1.69		2.21		2.23		2.68		4.33		4.31		2.42		2.53	
D13-22	NORTH	302	18	0.0003	1.66		2.21		2.23		2.69		4.34		4.31		2.43		2.53	

Model Analysis Results and Pipe Upsizing Summary by Scenario

Existing System					1		2		3		4		5		6		7a (10 percent)		7b (15 percent)	
Pipe_ID	Trunk	Length	Diameter	Slope	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)
D13-10	NORTH	95	18	0.0029	1.65		2.21		2.22		2.67		4.32		4.29		2.42		2.52	
D13-09	NORTH	397	18	0.0033	1.65		2.21		2.23		2.67		4.32		4.29		2.42		2.53	
D13-08	NORTH	494	15	0.0112	1.47		2.03		2.05		2.32		3.97		3.95		2.22		2.32	
D13-07	NORTH	399	15	0.0126	1.47		2.03		2.05		2.32		3.97		3.95		2.22		2.32	
D13-06	NORTH	218	15	0.0051	1.47		2.03		2.03		2.32		3.97	21	3.92	18	2.22		2.32	
D13-05	NORTH	83	15	0.0069	1.47		2.03		2.03		2.32		3.97	21	3.92	18	2.22		2.32	
D13-50	NORTH	105	15	0.0044	1.47		2.03		2.03		2.32		3.97	21	3.93	18	2.22		2.32	
D13-01	NORTH	92	15	0.0052	1.47		2.03		2.04		2.31		3.96	21	3.92	18	2.22		2.32	
D13-02	NORTH	364	15	0.0048	1.47		2.03		2.04		2.31		3.96	21	3.93	18	2.23		2.32	
D13-03	NORTH	105	15	0.0038	1.47		2.03		2.04		2.31		3.96	21	3.93	18	2.23		2.32	
D13-14	NORTH	110	15	0.0019	1.47		2.03		2.04		2.31		3.96	19	3.92	18	2.23		2.32	
D13-27	NORTH	394	15	0.0048	1.48		2.03		2.04		2.30		3.96	19	3.92	18	2.23		2.32	
D13-26	NORTH	61	15	0.0049	1.48		2.03		2.04		2.24		3.91	19	3.86	18	2.22		2.31	
D14-03	NORTH	304	15	0.0058	1.46		2.02		2.02		2.23		3.89	19	3.85	18	2.21		2.30	
D14-04	NORTH	295	15	0.0042	1.46		2.02		2.02		2.23		3.90	19	3.85	18	2.21		2.30	
D14-115	NORTH	101	12	0.0216	0.32		0.32		0.32		0.40		0.40		0.40		0.33		0.33	
D15-09	NORTH	298	12	0.0236	0.33		0.32		0.32		0.40		0.40		0.40		0.33		0.33	
D14-10	NORTH	360	12	0.0082	0.33		0.32		0.32		0.40		0.40		0.40		0.33		0.34	
D14-107	NORTH	81	12	0.0043	0.33		0.32		0.32		0.40		0.40		0.40		0.33		0.34	
D14-11	NORTH	220	12	0.0030	0.31		0.31		0.31		0.39		0.39		0.39		0.32		0.32	
D14-69	NORTH	376	12	0.0028	0.32		0.31		0.31		0.39		0.39		0.39		0.32		0.32	
D14-M70	NORTH	240	12	0.0036	0.29		0.29		0.29		0.37		0.37		0.37		0.30		0.30	
D14-71	NORTH	87	12	0.0046	0.29		0.29		0.29		0.37		0.37		0.37		0.30		0.30	
D14-72	NORTH	139	12	0.0006	0.29		0.29		0.29		0.36		0.36		0.36		0.29		0.30	
D14-14	NORTH	29	12	0.0204	0.29		0.29		0.29		0.36		0.36		0.36		0.29		0.30	
D14-15	NORTH	336	10	0.0090	0.19		0.19		0.19		0.25		0.25		0.25		0.19		0.20	
D14-16	NORTH	241	10	0.0187	0.19		0.19		0.19		0.25		0.25		0.25		0.19		0.20	
D15-139	NORTH	389	10	0.0047	0.19		0.19		0.19		0.25		0.25		0.25		0.19		0.20	
D15-138	NORTH	31	10	0.0035	0.19		0.18		0.18		0.24		0.24		0.24		0.19		0.19	
D15-137	NORTH	108	10	0.0030	0.14		0.14		0.14		0.17		0.17		0.17		0.14		0.14	
D15-136	NORTH	217	10	0.0032	0.12		0.12		0.12		0.15		0.15		0.15		0.12		0.13	
D15-135	NORTH	277	10	0.0202	0.12		0.12		0.12		0.15		0.15		0.15		0.12		0.13	
D15-134	NORTH	12	10	0.0595	0.12		0.12		0.12		0.15		0.15		0.15		0.12		0.12	
D15-25	NORTH	256	10	0.0049	0.12		0.12		0.12		0.15		0.15		0.15		0.12		0.12	
E15-56	NORTH	64	10	0.0031	0.12		0.12		0.12		0.15		0.15		0.15		0.12		0.12	
E15-57	NORTH	201	10	0.0015	0.12		0.12		0.12		0.15		0.15		0.15		0.12		0.12	
E15-58	NORTH	244	10	0.0025	0.11		0.11		0.11		0.14		0.14		0.14		0.11		0.12	
E15-59	NORTH	155	10	0.0040	0.11		0.11		0.11		0.14		0.14		0.14		0.11		0.11	
E15-60	NORTH	206	10	0.0086	0.11		0.11		0.11		0.14		0.14		0.14		0.11		0.11	
E15-61	NORTH	264	10	0.0042	0.10		0.10		0.10		0.13		0.13		0.13		0.11		0.11	
D15-24	NORTH	101	10	0.0084	0.06		0.06		0.06		0.07		0.07		0.07		0.06		0.06	
D13-25	NORTH	11	10	0.2893	0.12		0.12		0.12		0.17		0.17		0.17		0.13		0.13	
D13-11	NORTH	56	10	0.0893	0.13		0.12		0.12		0.17		0.17		0.17		0.13		0.13	
D13-33	NORTH	34	10	0.0088	0.12		0.12		0.12		0.17		0.17		0.17		0.13		0.13	
D14-118	NORTH	135	15	0.0023	1.19		1.72		1.71		1.86		3.51	18	3.45	18	1.98		1.99	
D14-05	NORTH	94	15	0.0036	1.18		1.72		1.71		1.86		3.51	18	3.45	18	1.98		1.99	

Brown—Caldwell

B-2

Model Analysis Results and Pipe Upsizing Summary by Scenario

Existing System					1		2		3		4		5		6		7a (10 percent)		7b (15 percent)	
Pipe_ID	Trunk	Length	Diameter	Slope	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)
D14-06	NORTH	220	15	0.0043	1.18		1.71		1.70		1.85		3.51	18	3.45	18	1.89		1.98	
D14-117	NORTH	187	15	0.0012	1.18		1.71		1.70		1.85		3.51	18	3.45	18	1.89		1.98	
D14-07	NORTH	42	15	0.0031	1.18		1.71		1.70		1.85		3.52	18	3.46	18	1.89		1.98	
D14-116	NORTH	161	15	0.0017	1.17		1.70		1.69		1.84		3.51	18	3.44	18	1.88		1.97	
D14-08	NORTH	265	15	0.0026	1.17		1.70		1.68		1.84		3.52	18	3.45	18	1.88		1.97	
E14-51	NORTH	340	15	0.0016	1.16		1.70		1.68		1.84		3.52	18	3.44	18	1.88		1.97	
E14-57	NORTH	102	15	0.0045	1.16		1.70		1.68		1.83		3.52	18	3.45	18	1.88		1.97	
E14-50	NORTH	189	15	0.0029	1.16		1.70		1.68		1.83		3.52	18	3.45	18	1.88		1.96	
E14-09	NORTH	300	15	0.0026	1.16		1.69		1.68		1.82		3.52	18	3.44	18	1.87		1.96	
E14-91	NORTH	213	15	0.0030	1.16		1.69		1.68		1.83		3.52	18	3.44	18	1.87		1.96	
E14-68	NORTH	93	15	0.0035	1.16		1.69		1.68		1.83		3.52	18	3.44	18	1.87		1.96	
E14-47	NORTH	330	15	0.0025	1.12		1.65		1.15		1.78		3.47	18	1.28		1.84		1.93	
E14-05	NORTH	414	15	0.0033	1.13		1.66		1.15		1.79		3.48	18	1.28		1.84		1.93	
E14-22	NORTH	257	12	0.0018	0.77		1.30		0.78		1.28		2.96	18	1.28		1.46		1.54	
E14-21	NORTH	387	12	0.0025	0.77		1.30		0.78		1.28		2.97	18	1.28		1.47		1.55	
E14-20	NORTH	387	12	0.0143	0.77		1.30		0.78		1.28		2.97	18	1.28		1.47		1.55	
E14-19	NORTH	402	12	0.0025	0.77		1.30		0.78		1.28		2.97	18	1.28		1.48		1.56	
E14-18	NORTH	175	12	0.0040	0.77		1.31		0.79		1.28		2.97	18	1.28		1.48		1.56	
E14-16	NORTH	303	12	0.0023	0.76		1.29		0.77		1.27		2.96	18	1.27		1.46		1.54	
E14-72	NORTH	389	12	0.0071	0.76		1.29		0.77		1.27		2.96	18	1.27		1.47		1.55	
E15-03	NORTH	272	12	0.0041	0.76		1.30		0.77		1.27		2.96	18	1.27		1.47		1.55	
E15-04	NORTH	147	12	0.0034	0.72		1.26		0.75		1.23		2.92	18	1.23		1.43		1.51	
E15-05	NORTH	357	12	0.0032	0.73		1.26		0.76		1.24		2.92	18	1.24		1.45		1.51	
E15-90	NORTH	399	12	0.0058	0.73		1.26		0.74		1.24		2.92	18	1.24		1.43		1.52	
E15-21	NORTH	464	12	0.0025	0.73		1.27		0.74		1.24		2.92	18	1.24		1.44		1.52	
E15-20	NORTH	358	12	0.0023	0.68		1.22		0.69		1.17		2.85	18	1.17		1.38		1.47	
E15-19	NORTH	265	12	0.0029	0.68		1.22		0.69		1.17		2.86	15	1.17		1.38		1.47	
E15-18	NORTH	203	12	0.0064	0.68		1.22		0.69		1.17		2.86	15	1.17		1.39		1.47	
E15-17	NORTH	204	12	0.0065	0.68		1.22		0.69		1.17		2.87	15	1.17		1.39		1.47	
E15-16	NORTH	148	12	0.0291	0.68		1.22		0.68		1.17		2.87		1.17		1.38		1.47	
E15-15	NORTH	316	12	0.0023	0.65		1.18		0.65		1.11		2.81	18	1.11		1.35		1.43	
E15-14	NORTH	254	12	0.0033	0.65		1.18		0.65		1.11		2.82	18	1.11		1.35		1.43	
E15-13	NORTH	335	12	0.0039	0.65		1.18		0.65		1.11		2.83	18	1.11		1.35		1.43	
E16-06	NORTH	325	12	0.0051	0.65		1.18		0.65		1.11		2.83	18	1.11		1.36		1.44	
E16-05	NORTH	397	12	0.0049	0.65		1.19		0.65		1.11		2.84	18	1.11		1.36		1.44	
E16-04	NORTH	403	12	0.0063	0.65		1.19		0.66		1.11		2.84	18	1.11		1.37		1.45	
E16-03	NORTH	151	12	0.0180	0.65		1.20		0.66		1.12		2.84		1.12		1.37		1.45	
E16-02	NORTH	340	12	0.0016	0.54		1.08		0.56		0.95		2.68	18	0.95		1.25		1.33	
E16-01	NORTH	402	12	0.0053	0.54		1.09		0.55		0.96		2.68	18	0.96		1.25		1.33	
G16-57	NORTH	330	12	0.0097	0.55		1.09		0.56		0.96		2.69	18	0.96		1.26	18	1.33	18
G16-53	NORTH	344	12	0.0026	0.55		1.08		0.56		0.96		2.69	18	0.96		1.26	18	1.34	18
G16-50	NORTH	218	12	0.0021	0.52		1.07		0.52		0.91		2.64	18	0.91		1.23	18	1.31	18
G16-49	NORTH	227	12	0.0021	0.52		1.07		0.52		0.92		2.64	18	0.92		1.23	18	1.31	18
G16-44	NORTH	280	12	0.0016	0.53		1.07		0.52		0.92		2.65	18	0.92		1.23	18	1.31	18
G16-43	NORTH	198	12	0.0195	0.69		1.04		0.48		0.87		2.60		0.87		1.20		1.27	
G16-31	NORTH	424	12	0.0030	0.68		1.09		0.48		0.86		2.58	18	0.86		1.19	18	1.26	18

Brown—Caldwell

B-3

Model Analysis Results and Pipe Upsizing Summary by Scenario

Existing System					1		2		3		4		5		6		7a (10 percent)		7b (15 percent)	
Pipe_ID	Trunk	Length	Diameter	Slope	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)
G16-30	NORTH	481	12	0.0038	0.46		1.01		0.46		0.84		2.58	18	0.84		1.17	18	1.25	18
G16-29	NORTH	265	8	0.0075	0.46		1.00	10	0.46		0.84	10	2.58	15	0.84	10	1.17	15	1.25	15
G16-09	NORTH	215	8	0.0233	0.46		1.00	10	0.46		0.84		2.58	12	0.84		1.17	12	1.25	12
G16-71	NORTH	66	6	0.0236	0.38		0.82	10	0.38		0.64	8	2.38	12	0.64	8	1.07	12	1.15	12
G16-08	NORTH	178	6	0.0262	0.37		0.82	10	0.37		0.63	8	2.37	12	0.63	8	1.07	12	1.14	12
G16-07	NORTH	207	6	0.0420	0.37		0.82	10	0.37		0.63		2.37	12	0.63		1.07	12	1.14	12
H16-17	NORTH	269	8	0.0432	0.36		0.80	10	0.36		0.61		2.35	12	0.61		1.06	12	1.13	12
H16-16	NORTH	227	6	0.0095	0.35		0.80	10	0.35		0.59	10	2.34	15	0.59	10	1.05	15	1.12	15
H16-05	NORTH	495	6	0.0125	0.35		0.80	10	0.35		0.59	10	2.34	15	0.59	10	1.05	15	1.12	15
H16-04	NORTH	288	8	0.0067	0.33		0.88	10	0.33		0.57	10	2.32	15	0.57	10	1.03	15	1.10	15
H16-02	NORTH	362	6	0.0035	0.33	10	0.88	10	0.33	10	0.58	10	2.33	15	0.58	10	1.03	15	1.11	15
H16-01	NORTH	101	6	0.0236	0.14		0.42	10	0.14		0.23		1.11	12	0.23		0.48	12	0.52	12
H16-21.2	NORTH	101	6	0.0243	0.14		0.43	10	0.14		0.23		1.11	12	0.23		0.48	12	0.52	12
H16-22	NORTH	210	6	0.0156	0.14		0.43	10	0.14		0.23		1.11	12	0.23		0.49	12	0.52	12
H16-23.1	NORTH	210	6	0.0156	0.14		0.42	10	0.14		0.23		1.11	12	0.23		0.48	12	0.52	12
H16-23	NORTH	208	6	0.0075	0.14		0.42	10	0.14		0.23		1.11	12	0.23		0.48	12	0.52	12
H16-23.2	NORTH	208	6	0.0075	0.14		0.42	10	0.14		0.23		1.11	12	0.23		0.49	12	0.52	12
H16-24	NORTH	201	6	0.0174	0.14		0.42	10	0.14		0.23		1.11	12	0.23		0.49	12	0.52	12
H16-24.2	NORTH	201	6	0.0174	0.14		0.42	10	0.14		0.23		1.11	12	0.23		0.49	12	0.52	12
H16-28	NORTH	156	6	0.0218	0.14		0.42	10	0.14		0.23		1.11	12	0.23		0.49	12	0.52	12
H16-28.2	NORTH	156	6	0.0250	0.14		0.42	10	0.14		0.23		1.11	12	0.23		0.49	12	0.52	12
H16-29	NORTH	83	8	0.0050	0.28		0.85	10	0.28		0.47		2.23	15	0.47		0.98	15	1.05	15
H17-12	NORTH	233	8	0.0025	0.27		0.83	10	0.27		0.45		2.21	15	0.45		0.96	15	1.03	15
H17-11	NORTH	391	8	0.0041	0.26		0.82	10	0.26		0.42		2.19	15	0.42		0.96	15	1.03	15
H17-68	NORTH	121	8	0.0041	0.26		0.82	10	0.26		0.43		2.19	15	0.43		0.96	15	1.03	15
I17-27	NORTH	264	8	0.0041	0.26		0.82	10	0.26		0.39		2.15	15	0.39		0.95	15	1.02	15
I17-13	NORTH	407	8	0.0038	0.24		0.80	10	0.24		0.37		2.14	15	0.37		0.94	15	1.00	15
I17-12	NORTH	186	8	0.0029	0.24		0.80	10	0.24		0.37		2.15	15	0.37		0.94	15	1.01	15
I17-11	NORTH	232	8	0.0033	0.24		0.81	10	0.24		0.37		2.17	15	0.37		0.95	15	1.03	15
I17-10	NORTH	355	8	0.0025	0.24		0.82	10	0.24		0.37		2.19	15	0.37		0.96	15	1.04	15
SM03	NORTH	100	12	0.0100			0.59		0.58				1.84		1.84		0.71		0.77	
G9-04	WEST	152	15	0.0059	1.06		Same as Scenario 1				3.21		Same as Scenario 4				South and West Trunks were not part of the INTERIM analysis			
G9-13	WEST	362	15	0.0268	1.05						3.18									
G9-43	WEST	103	15	0.0187	1.05						3.18									
G9-12	WEST	295	15	0.0203	1.03						3.14									
G9-11	WEST	309	15	0.0082	1.03						3.15									
G9-10	WEST	327	15	0.0019	1.04						3.15	18								
G9-09	WEST	101	15	0.0019	1.04						3.16	18								
G9-08	WEST	324	15	0.0034	1.03						3.12	18								
G9-06	WEST	176	15	0.0022	1.03						3.12	18								
G9-07	WEST	126	15	0.0019	1.03						3.12	18								
G9-23	WEST	158	15	0.0006	1.03						3.13	18								
G9-05	WEST	113	15	0.0020	1.02						3.13	18								
G9-24	WEST	107	15	0.0058	1.03						3.11									
G9-26	WEST	363	15	0.0137	0.93						3.02									
G9-25	WEST	102	15	0.0012	0.93						3.02	18								

Brown—Caldwell

B-4

Model Analysis Results and Pipe Upsizing Summary by Scenario

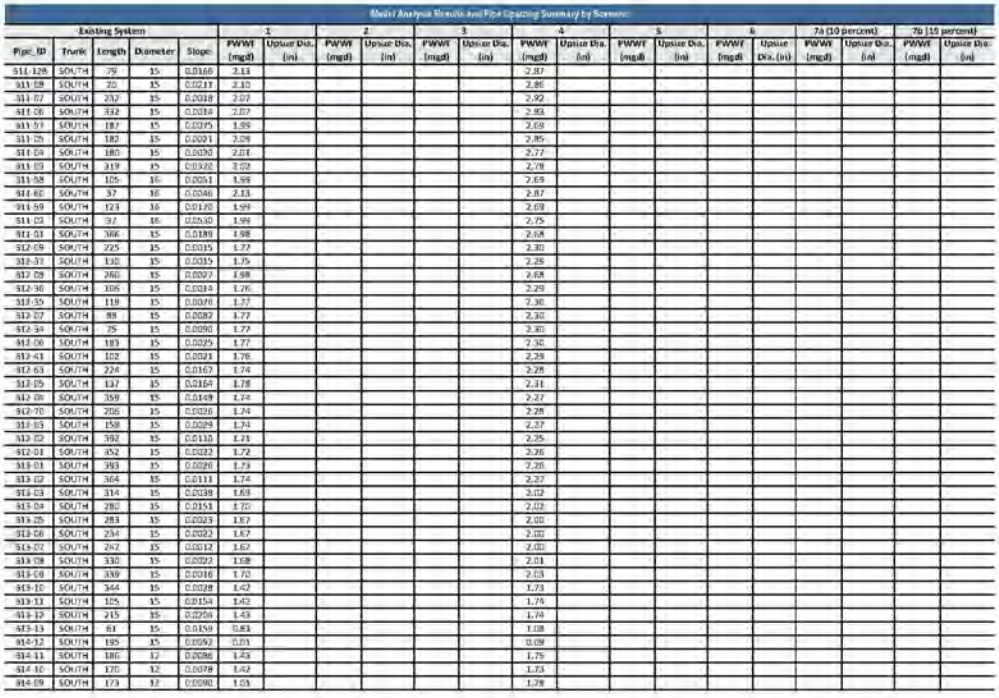
Existing System					1		2		3		4		5		6		7a (10 percent)		7b (15 percent)	
Pipe_ID	Trunk	Length	Diameter	Slope	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)
09-03	WEST	201	15	0.0034	0.92						3.01	18								
09-02	WEST	75	15	0.0012	0.92						3.02	18								
09-1A	WEST	127	15	0.0020	0.92						3.02	18								
09-01	WEST	213	15	0.0036	0.93						3.02	18								
09-14	WEST	353	15	0.0016	0.91						2.99	18								
09-13	WEST	94	15	0.0031	0.91						2.98	18								
09-12	WEST	356	15	0.0016	0.92						2.99	18								
09-11	WEST	361	15	0.0019	0.92						3.00	18								
09-10	WEST	358	15	0.0011	0.93						3.00	18								
09-09	WEST	373	15	0.0023	0.93						3.00	18								
09-22	WEST	18	12	0.0159	0.92						2.41									
09-04	WEST	386	10	0.0026	0.13						1.36	15								
09-03	WEST	371	10	0.0003	0.13						1.38	15								
09-02	WEST	28	10	0.0029	0.13						1.38	15								
09-24	WEST	56	10	0.0018	0.09						1.35	15								
09-23	WEST	320	10	0.0019	0.09						1.34	15								
09-08	WEST	108	12	0.0015	0.86						2.47									
09-07	WEST	44	10	0.0492	0.13						0.14									
E10-07	WEST	401	12	0.0048	0.83						2.41	15								
E10-08	WEST	399	12	0.0028	0.82						2.42	15								
E10-09	WEST	396	12	0.0022	0.82						2.42	15								
E10-10	WEST	47	12	0.0000	0.88						2.68	15								
E10-11	WEST	403	12	0.0031	0.90						2.72	15								
E10-59	WEST	51	12	0.0069	0.90						2.73	15								
E10-12	WEST	89	10	0.0017	0.35						2.06	15								
E10-13	WEST	283	10	0.0054	0.34						2.07	15								
E10-14	WEST	400	10	0.0047	0.34						2.08	15								
E10-47	WEST	487	10	0.0005	0.03						0.03									
E10-46	WEST	493	10	0.0031	0.03						0.03									
E10-45	WEST	487	10	0.0022	0.03						0.03									
E10-21	WEST	278	10	0.0043	0.54						0.66									
E10-60	WEST	165	10	0.0048	0.19						0.20									
E10-61	WEST	48	10	0.0050	0.19						0.20									
E10-62	WEST	154	10	0.0054	0.19						0.20									
E10-63	WEST	272	10	0.0054	0.19						0.20									
E10-22	WEST	70	10	0.0065	0.19						0.20									
E10-23	WEST	676	10	0.0042	0.36						0.47									
E10-24	WEST	420	10	0.0037	0.32						0.44									
E10-25	WEST	248	10	0.0044	0.32						0.43									
E10-42	WEST	513	10	0.0055	0.29						0.41									
E10-43	WEST	181	10	0.0160	0.29						0.41									
E10-44	WEST	931	10	0.0022	0.29						0.41									
E10-69	WEST	180	10	0.0021	0.29						0.42									
E11-16	WEST	296	10	0.0018	0.30						0.42									
E11-17	WEST	134	10	0.0030	0.30						0.43									
A8-03	SOUTH	138	18	0.0021	2.78						3.61	18								

Model Analysis Results and Pipe Upsizing Summary by Scenario

Existing System					1		2		3		4		5		6		7a (10 percent)		7b (15 percent)	
Pipe_ID	Trunk	Length	Diameter	Slope	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)
A9-11	SOUTH	282	18	0.0016	3.75						4.16	21								
A9-10	SOUTH	46	18	0.0007	3.24						4.19	21								
A9-09	SOUTH	211	18	0.0027	3.24						4.19	21								
A9-08	SOUTH	396	18	0.0012	3.25						4.19	21								
A9-12	SOUTH	248	18	0.0031	3.13						3.96	21								
A9-07	SOUTH	160	18	0.0019	3.25						4.20	21								
A9-54	SOUTH	175	18	0.0013	3.13						3.96	21								
A9-06	SOUTH	217	18	0.0022	3.11						4.02	21								
A9-50	SOUTH	164	18	0.0030	3.30						4.08	18								
A9-49	SOUTH	162	18	0.0017	3.12						3.96	21								
A9-MS	SOUTH	80	18	0.0029	3.10						3.94									
A9-05	SOUTH	326	18	0.0025	3.11						4.01	21								
A9-03	SOUTH	268	15	0.0057	3.15						3.98	21								
A9-02	SOUTH	304	15	0.0072	2.78						3.61	18								
A9-01	SOUTH	105	15	0.0058	2.78						3.61	18								
A9-51	SOUTH	255	15	0.0053	3.11						4.01	21								
A10-09	SOUTH	312	15	0.0063	3.10						3.89									
A10-08	SOUTH	400	15	0.0059	3.32						4.09	18								
A10-07	SOUTH	267	15	0.0065	3.33						4.10	18								
A10-06	SOUTH	403	15	0.0102	3.34						4.11	18								
A10-05	SOUTH	333	15	0.0106	3.36						4.15									
A10-05A	SOUTH	321	15	0.0093	3.35						4.13									
A10-04	SOUTH	283	15	0.0096	3.35						4.14									
A10-03	SOUTH	274	15	0.0108	3.37						4.16									
A10-21	SOUTH	185	10	0.0544	0.28						0.29									
A10-22	SOUTH	365	10	0.0029	0.28						0.29									
A10-23	SOUTH	288	10	0.0080	0.27						0.28									
A10-56	SOUTH	311	10	0.0060	3.27						4.30									
A10-11	SOUTH	252	15	0.0017	3.08						3.87									
A10-02	SOUTH	248	15	0.0215	3.37						4.17									
A10-01	SOUTH	160	15	0.0225	3.09						3.87									
A10-19	SOUTH	56	15	0.0094	0.30						0.32									
A10-02	SOUTH	325	15	0.0030	3.00						3.79									
A10-53	SOUTH	110	15	0.0088	1.87						2.67									
A10-01	SOUTH	159	15	0.0046	3.03						3.88									
A11-12	SOUTH	272	15	0.0038	2.09						2.86									
A11-16	SOUTH	621	15	0.0034	2.99						3.78									
A11-15	SOUTH	393	15	0.0077	2.95						3.75									
A11-14	SOUTH	362	15	0.0056	2.13						2.87									
A11-75	SOUTH	102	15	0.0068	1.73						2.27									
A11-74	SOUTH	244	15	0.0043	2.14						2.87									
A11-13	SOUTH	294	15	0.0043	2.10						2.85									
A11-10	SOUTH	261	15	0.0098	2.10						2.86									
A11-123	SOUTH	148	15	0.0034	2.08						2.84									
A11-09	SOUTH	98	15	0.0046	2.11						2.88									
A11-107	SOUTH	147	15	0.0102	2.11						2.85									

Brown—Caldwell

B-6



Model Analysis Results and Pipe Upsizing Summary by Scenario

Existing System					1		2		3		4		5		6		7a (10 percent)		7b (15 percent)	
Pipe_ID	Trunk	Length	Diameter	Slope	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)
S11-128	SOUTH	79	15	0.0166	2.13						2.87									
S11-08	SOUTH	20	15	0.0211	2.10						2.86									
S11-07	SOUTH	252	15	0.0048	2.07						2.92									
S11-06	SOUTH	332	15	0.0034	2.07						2.93									
S11-53	SOUTH	187	15	0.0075	1.95						2.69									
S11-25	SOUTH	182	15	0.0091	2.08						2.85									
S11-04	SOUTH	180	15	0.0030	2.01						2.77									
S11-03	SOUTH	319	15	0.0020	2.02						2.78									
S11-58	SOUTH	105	16	0.0051	1.99						2.69									
S11-60	SOUTH	37	18	0.0046	2.13						2.87									
S11-59	SOUTH	123	18	0.0120	1.99						2.69									
S11-02	SOUTH	92	18	0.0030	1.99						2.75									
S11-01	SOUTH	386	15	0.0189	1.98						2.68									
S12-09	SOUTH	225	15	0.0035	1.77						2.30									
S12-37	SOUTH	130	15	0.0035	1.75						2.28									
S12-08	SOUTH	260	15	0.0027	1.98						2.68									
S12-36	SOUTH	106	15	0.0034	1.76						2.29									
S12-35	SOUTH	119	15	0.0076	1.77						2.30									
S12-07	SOUTH	88	15	0.0082	1.77						2.30									
S12-34	SOUTH	75	15	0.0090	1.77						2.30									
S12-06	SOUTH	183	15	0.0025	1.77						2.30									
S12-41	SOUTH	102	15	0.0021	1.76						2.28									
S12-63	SOUTH	224	15	0.0167	1.74						2.28									
S13-05	SOUTH	137	15	0.0164	1.78						2.31									
S12-04	SOUTH	359	15	0.0149	1.74						2.27									
S12-70	SOUTH	205	15	0.0026	1.74						2.28									
S13-15	SOUTH	158	15	0.0029	1.74						2.27									
S12-02	SOUTH	392	15	0.0110	1.73						2.25									
S12-01	SOUTH	352	15	0.0022	1.72						2.26									
S13-01	SOUTH	393	15	0.0026	1.73						2.26									
S13-02	SOUTH	364	15	0.0111	1.74						2.27									
S13-03	SOUTH	314	15	0.0038	1.69						2.02									
S13-04	SOUTH	280	15	0.0151	1.70						2.02									
S13-25	SOUTH	283	15	0.0023	1.67						2.00									
S13-06	SOUTH	234	15	0.0022	1.67						2.00									
S13-07	SOUTH	262	15	0.0012	1.62						2.00									
S13-08	SOUTH	330	15	0.0023	1.68						2.01									
S13-09	SOUTH	339	15	0.0016	1.70						2.03									
S13-10	SOUTH	344	15	0.0028	1.42						1.73									
S13-11	SOUTH	105	15	0.0154	1.42						1.74									
S13-12	SOUTH	215	15	0.0204	1.43						1.74									
S13-13	SOUTH	61	15	0.0159	0.83						1.08									
S14-12	SOUTH	195	15	0.0092	0.81						0.99									
S14-11	SOUTH	186	12	0.0086	1.43						1.75									
S14-10	SOUTH	170	12	0.0078	1.42						1.73									
S14-09	SOUTH	173	12	0.0080	1.03						1.28									

Model Analysis Results and Pipe Upsizing Summary by Scenario

Existing System					1		2		3		4		5		6		7a (10 percent)		7b (15 percent)	
Pipe_ID	Trunk	Length	Diameter	Slope	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)	PWWF (mgd)	Upsize Dia. (in)
B14-09	SOUTH	72	12	0.0038	1.10						1.27									
B14-07	SOUTH	612	12	0.0038	1.10						1.27									
B14-06	SOUTH	118	12	0.0095	0.98						1.25									
B14-05	SOUTH	103	12	0.0070	0.98						1.26									
B14-04	SOUTH	248	12	0.0067	0.88						1.12									
B14-03	SOUTH	63	12	0.0107	0.88						1.12									
B14-02	SOUTH	244	12	0.0069	0.86						1.11									
B14-01	SOUTH	43	12	0.0009	0.86						1.11									
C14-06	SOUTH	180	12	0.0139	0.74						0.89									
C14-13	SOUTH	242	12	0.0122	0.83						1.08									
C14-11	SOUTH	367	12	0.0213	0.84						1.09									
C14-10	SOUTH	255	12	0.0223	0.84						1.09									
C14-08	SOUTH	118	12	0.0066	0.81						1.06									
C14-05	SOUTH	236	12	0.0035	0.82						1.07									
C14-04	SOUTH	219	10	0.0097	0.78						1.03									
C14-03	SOUTH	159	10	0.0164	0.79						1.04									
C15-56	SOUTH	282	10	0.0183	0.75						0.98									
C15-57	SOUTH	375	10	0.0114	0.76						0.99									
C15-58	SOUTH	256	10	0.0092	0.67						0.74									
C15-45	SOUTH	385	10	0.0038	0.66						0.72									
C15-46	SOUTH	260	10	0.0086	0.67						0.73									
C15-48	SOUTH	605	10	0.0091	0.67						0.74									
C15-49	SOUTH	211	10	0.0050	0.75						0.91									
D15-85	SOUTH	115	10	0.0048	0.00						0.00									
D15-86	SOUTH	103	10	0.0013	0.67						0.74									
C13-17	SOUTH	313	10	0.0022	0.79						1.04									
C13-16	SOUTH	401	10	0.0023	0.05						0.25									
C13-15	SOUTH	347	10	0.0027	0.05						0.26									
C13-14	SOUTH	236	10	0.0023	0.05						0.26									
C13-13	SOUTH	191	10	0.0025	0.04						0.22									
C13-12	SOUTH	354	10	0.0022	0.04						0.12									
C12-20	SOUTH	285	10	0.0026	0.03						0.11									
C12-01	SOUTH	172	10	0.0025	0.02						0.10									

LETTER 47: CHERYL BERKEMA

Response to Comment 47-1

A response to the commenter's email was provided via email on March 18, 2024. Newer reports have not been prepared since the 2011 Granite Bay report included in the comment. As noted in the report, there are potential hydraulic capacity deficiencies at certain locations on the trunk sewer facilities at buildout of SMD 2 and SMD 3. As growth occurs, proposed projects will be required to analyze their impacts to sewer infrastructure capacity, and if necessary, construct sewer improvements to serve their developments, and/or pay fair share fees to fund the required future capacity improvements to the existing sewer infrastructure for the planned buildout of the service areas.

Letter 48

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Placer County-Housing Element Sites Rezone (PLN22-00476)
Date: Tuesday, March 19, 2024 10:50:15 AM

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, March 18, 2024 11:50 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Cheryl Berkema <cheryl.berkema@gmail.com>
Subject: Fwd: Placer County-Housing Element Sites Rezone (PLN22-00476)

Hello Kally,

Please add all of the correspondence below including attachments to the DEIR.

48-1 The DEIR fails to address the lack of a current traffic study in Granite Bay. A complete EIR is required to understand the cumulative traffic impacts for all major intersections, safety issues evidenced by crash statistics, Poor level of service at major intersections , the mitigation required for additional proposed traffic and how the mitigation will be funded.

48-2 Additionally, the US Census for 2020 reports significant avg VMT for the proposed sites in Granite Bay to jobs.
https://www.census.gov/quickfacts/fact/utable/granitebaycdpcalifornia/PST045223

The same US Census data should be used to evaluate Auburn and Penryn sites.

---------- Forwarded message ---------
From: **Lynch, Jessica** <JJLynch@roseville.ca.us>
Date: Tue, Mar 12, 2024 at 10:45 AM
Subject: RE: Placer County-Housing Element Sites Rezone (PLN22-00476)
To: cheryl.berkema@gmail.com <cheryl.berkema@gmail.com>

Hello Ms. Berkema,

48-3 I have forwarded your email to Placer County for their consideration of the Draft EIR. The City currently has no plans to submit a comment letter on the Draft EIR.

Jessica Lynch
Environmental Coordinator

Development Services Dept.
direct: (916) 774-5352
main: (916) 774-5276

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, March 11, 2024 4:09 PM
To: Planning External <PlanningDivision@roseville.ca.us>
Subject: Placer County-Housing Element Sites Rezone (PLN22-00476)

EXTERNAL: This email originated from outside of the organization. Do not click on any links or open attachments unless you recognize the sender and know the content is safe.

RE: Placer County-Housing Element Sites Rezone (PLN22-00476)
Attn: Mike Isom *Development Services Director*

Hello Director Isom,

I called your office recently and asked if Roseville had provided a response to the Notice of Preparation to the Placer County's Housing Element Sites Rezone DEIR. The planner I spoke with checked with Roseville Environmental Services and said that Roseville had not filed a response to the NOP.

48-4

The Draft Environmental Impact Report is available for review on the Environmental Coordination Services webpage: Housing Element Sites Rezone | Placer County, CA. Comments on the draft EIR can be submitted by 5 pm on March 18 via email to: cdraecs@placer.ca.gov or via fax at (530) 745-3080.
https://www.placer.ca.gov/9455/Housing-Element-Sites-Rezone
https://www.placer.ca.gov/8794/Housing-needs-rezone-program

I have concerns that some of the proposed sites may impact Sierra College and Douglas. Additionally, 4 sites are proposed in Granite Bay which due to the large number of units proposed cumulatively could impact traffic in Roseville.

48-5

I have lived in Granite Bay over 25 years and have paid close attention to the traffic challenges on major arterials. There were concerns listed with the Whitehawks developments (I&II) on Douglas just east of the Sierra College and Douglas intersection. Placer County is expected to widen Douglas just east of Sierra College to 6 lanes. This has not happened although several developments have been approved along Douglas and on Sierra college since. Of note, is approval of Bayside Soccer fields including regional tournaments and a couple mini storage facilities. The Rezone proposal includes housing on the Bayside property on the north end of the Bayside off of Sierra College.

The Douglas and Sierra College intersection regularly has traffic backed up in the intersection. Traffic is often blocking the intersection when the light changes. It would be greatly appreciated if you could look at the current Placer DEIR for impacts.

48-6

Please see the latest traffic accident and death statistics provided by the California Highway Patrol for major intersections. These were provided to the Placer District 4 Chief of Staff.

Also included is LOS for some intersections provided by Katie Jackson Placer Traffic Engineering KJackson@placer.ca.gov .

Michael Spelis Chief of Staff
Office of Supervisor Suzanne Jones Placer County District 4
MichaelSpelis@Placer.ca.gov
916-719-2955
Traffic statistics from: Norman, Yvette@CHP <YNorman@chp.ca.gov>

Thank you for your consideration,

Cheryl Berkema
916 202-7957

LETTER 48: CHERYL BERKEMA

Response to Comment 48-1

As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Please see Master Response 4 –Traffic Safety.

Response to Comment 48-2

The analysis of potential transportation impacts presented in Chapter 8, Transportation, of the Draft EIR is based primarily on the Transportation Impact Analysis (TIA) prepared for the proposed project by Fehr & Peers on January 12, 2024. The TIA, inclusive of its VMT analysis, was prepared using the most current data available and methodologies acceptable to the Placer County Department of Public Works.

Response to Comment 48-3

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 48-4

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 48-5

Please see Response to Comment 48-1.

Response to Comment 48-6

Please see Response to Comment 48-1.

Letter 49

From: Cheryl Berkema
To: Placer County Environmental Coordination Services
Cc: Cheryl Berkema
Subject: RHNA Rezone DEIR public feedback
Date: Wednesday, February 21, 2024 4:56:12 PM

RE: Public feedback on RHNA Rezones DEIR Feb 22,2024

Placer Planning Commissioners,

Lack of proper notification

- This meeting was not properly noticed to the public.
- The agenda was posted on the Rezone website Tuesday morning Feb 20,2024.
- The Planning website had the addition, it was not included in the Planning Commission regular agenda website.
- The DEIR link is not included in the agenda or in the staff report even though the topic is Public feedback on the DEIR.
- Giving a verbal update is also a Brown act violation, Supplemental Agendas can be used to post the information.
- Property 26 was not noticed or any posting done on site for inclusion into the 2021-2029 May 2021 Housing Element. A petition has been filed on change.org with over 1,000 signatures opposing property 26 inclusion in the RHNS rezone process.

49-1

Co-mingling of DEIR with the Board of Supervisors workshops/hearings

The Notice of Preparation for the RHNA Rezone DEIR should have included a list of all of the APNs included in the DEIR. The scope should have been set.

Public feedback provided at the Board of Supervisor meeting would likely be assumed to be given to the highest level of leadership and should be included in the DEIR. Co-mingling an environmental review process with Board workshops is highly problematic. A resident cannot be expected to know all of the County's processes (especially when they are errant). There was some very specific feedback given on the DEIR to the Board of Supervisors, again it should be included and responded to in the DEIR. Please include all verbal public feedback.

49-2

Planning is changing the scope of the list of properties while public feedback is still open on the EIR. This moving target to provide feedback on is impossible to comment on.

The Planning Director has changed the scope of the DEIR outside of the scope of the DEIR analysis. What gives the Director of Planning the authority to alter the scope of the program outside of the DEIR? Appendix A Table 5 (including county owned properties) was kept separate from properties in Table 4 (the list of properties under consideration) and table 4 was recommended to the supervisors by Planning as a resolution on Feb 13, 2024. By what authority?

Planning has failed to provide a change controlled list of properties (who changed, what date, county or private, why added or removed).

Scope changes to the RHNA Rezone DEIR

The proposal is for the General Plan Amendment to supersede the Community plans. By what authority?

Senior centers/living are being proposed as an approved use under RM30. The state does not require this. Please respond why Planning is adding scope creep to the RHNA Rezone proposal?

49-3

Senior centers in Granite Bay had land use amended to allow high density. None are affordable and certainly not low or very low income. Quite the contrary most are above moderate income. How does the addition for Senior centers/living assist in providing low and very low RHNA?

Alternatives in the DEIR

The County could have purchased land to fit the specifications for each RHNA income category. This should be included.

49-4 The County owned properties were not analyzed in the DEIR. Presenting county properties in an alternative without proper analysis is incomplete work. The impacts need to be assessed.

An alternative should have been included in the DEIR to amend the zoning ordinances to have minimum 30 units per acre and all commercial to allow mixed use since high density is anticipated at these locations and has been planned for with public services and transportation. Impacts would be less than significant and evenly distributed throughout the county vs a proposal with spot rezones.

49-5 Specific Plans should have been included in the DEIR. Specific Plans have all numerous times applied for extensions, changes, amendments and variances. These requests for changes open the contracts and agreements so can be renegotiated.

49-6 Impacts to services for law enforcement, fire, schools, medical services. Transit, road and sewer expansion must be feasible and funded. The DEIR has pushed the funding to be a future "as projects are brought on." The County cannot predict will- serve letters or funding availability.

Out of time

49-7 Using the excuse that there is no time to execute an amendment to the Sunset Area Plan is not justifiable. Ask for an extension of time. Approximately half of the RHNA deficit is in the Sunset Area Plan.

The Auburn General plan is not yet completed. Auburn has also expressed concern over the density being proposed.

Criteria not being followed

49-8 The State had requirements for parcel selection that Planning is not following. Property 26 in Granite Bay does not meet the size requirements.

Thank you for the opportunity to provide feedback,

Cheryl Berkema
Cheryl.berkema@gmail.com
Granite Bay Resident

LETTER 49: CHERYL BERKEMA

Response to Comment 49-1
The Draft EIR hearing was publicly notices pursuant to CEQA, the Brown Act, and the County Code.

Response to Comment 49-2
Table 2 of the Notice of Preparation (NOP) includes a list of all 72 sites analyzed for the rezone program including the Assessor's Parcel Number, the address, the gross acreage, the Supervisorial District, and the existing site conditions. The scope of the EIR has not changed since the NOP was published.

Response to Comment 49-3
The scope of the Draft EIR has not changed and has remained consistent. The commenter is referring to minor edits to the draft RM30 zoning ordinance to be consistent with the existing RM zoning ordinance and permissible uses.

Response to Comment 49-4
Please see Response to Comment 45-7.

Response to Comment 49-5
Changes to the approved Specific Plans are not proposed as part of the proposed project and, therefore, are not considered in the Draft EIR.

Response to Comment 49-6
Impacts to services are analyzed in Section XIV, Public Services, of the Initial Study. As discussed therein, will-serve letter requirements are a standard condition for all development.

Response to Comment 49-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 49-8
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 50

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Service
Subject: FW: Public Comment RHNA Rezone
Date: Tuesday, February 20, 2024 9:21:51 AM
Attachments: RHNA Rezone Timeline.pptx

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Tuesday, February 13, 2024 11:33 AM
To: bos@placer.ca.gov; Suzanne Jones <SuzanneJones@placer.ca.gov>; Jim Holmes <JHolmes@placer.ca.gov>; Shanti Landon <SLandon@placer.ca.gov>; Bonnie Gore <BonnieGore@placer.ca.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Michael Spelis <MichaelSpelis@placer.ca.gov>
Cc: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Megan Wood <MWood@placer.ca.gov>; Christopher Pahule <cpahule@placer.ca.gov>; Cheryl Berkema <cheryl.berkema@gmail.com>
Subject: Public Comment RHNA Rezone

Hello Supervisors and Planning Staff,

50-1

We are here today under 2 falsely promoted assumptions (1) that the state is just now coming up with a "new requirement" that Placer must show RHNA numbers for low income housing can be met throughout the current housing element, (2) that Placer unincorporated existing residents should pick up the shortfall. The County owes an explanation why residents are expected to pay for the RHNA shortfall when the county knew it was not meeting their 2013-2021 Housing Element obligation. The County Supervisors Gore, Weygandt (ret), Holmes, Uhler (voted out of office) and Gustafson ignored their Housing Element obligation. Instead, these supervisors repeatedly approved amendments for special interests, accepted in-lieu fees, or forgave the obligations completely. Residents pay their tax obligations when they are due or they are penalized; the County is expected to meet their Housing Element obligations on time. So we are here today because those supervisors defaulted on their Housing Element obligations.

Transparency

- The Notice Of Preparation for this program was posted in the Sacramento Bee, a paid subscription, rather than in the local community publication on a subject to remedy affordable housing shortfall. That pretty much sums up Planning's intent to keep the project from being communicated to residents.
- All public feedback should be posted on the Rezone website. The public should not have to sift through staff reports in multiple places to see public comment. The EIR scoping meeting should have minutes included on the Rezone website.
- Expecting residents to go to multiple places to find the history of the project is confusing to the public.
- Confusing the EIR feedback with the workshop feedback not providing "after comments to the public" also shows a lack of project management. Some of this

50-1 cont.

has been corrected, but many residents are frustrated with the lack of notice and inability to find information.

Insufficient diagrams for residents to be able to visualize the rezones

- I have made requests from county staff to provide County owned properties on the rezone maps by districts including job centers and amenities. Other residents have requested the same. The context of these properties compared to the proposed rezone properties needs to be a visual. All properties that could qualify should be shown side by side to help provide context.

Traffic

- I have made requests for Level Of Service (LOS) for all major intersections in Granite Bay along Auburn Folsom, Eureka, Sierra College and Douglas Blvd. The information still has not been provided.Some Granite Bay intersections are LOS F.
- Granite Bay has not had a traffic study since 2012 with the update of the Community Plan.Granite Bay has had many accidents and deaths. The safety of existing residents should be the top priority.

Signage

- Proposed Rezone signs have not been posted on Granite Bay.If they are on the ever revolving list then they should be posted. Properties.County staff has not done due diligence in notifying residents. Have residents within 300 ft been notified?
- Have signs been posted on ALL of the proposed rezone properties in the County?

Criteria for rezone parcels & change control

- The criteria for property inclusion should have been determined with the notice of preparation which is expected to describe the project in sufficient detail.
- A sliding set of properties shows lack of change control for the project.The superset of properties: county properties, specific plans, volunteered private properties , and amended Sunset Area Plan should have been determined and then properties removed from the list as they were disqualified. The criteria for the projects should remain consistent. If parcels meet the criteria then they should be ranked. Properties that do not meet the criteria should then be excluded. Properties should not be able to be "modified" to meet the criteria- this would be an infinite loop and suspect to provide special treatment to individual property owners.

Incomplete analysis

- **The Draft EIR fails to identify why County owned properties are being excluded from the rezones.**

The draft EIR fails to provide hybrid solutions. The County has received significant feedback that specific plans, a Sunset Area Plan/Placer Ranch amendment, and District 2 additional rezone acreage inclusion.

- The county has failed to explain why they cannot/did not **purchase suitable areas** for the RHNA Rezone. Planning has had years to come up with solutions.
- The County has failed to include Specific plans in the plan. Planning has had years to come up with solutions, not having time now is a poor performance indicator not a valid excuse, **If Planning cannot get their work done within the specified timeframe ask for an extension. The deadline was well known in advance.** There are specific plans on the active projects list (applications pending). New project proposals should not be considered until the county fixes the shortfall of RHNA rezones. If the county cannot manage their workload to meet their obligations they should have a moratorium on new developments.

Social Justice

- The County has also failed to adequately explain the disparity of high density low income parcels in the Auburn area and low- medium density high income properties that use ADUs as their affordable obligation in West Placer.

Lack of a Master Plan for County infrastructure and services to support housing obligations

50-1 Cont.

- The RHNA rezone was a housing program proposal by the Housing Manager to correct Placer's Housing obligation deficits, with no "actual communicated plan" for the Countywide infrastructure required to support the rezones. The County owes an explanation on the significant infrastructure funding provided to West Placer high income low density area for future residents for roads & sewers, for the sewer study for Auburn area with an incomplete Auburn General Plan update to justify low income high density developments. Auburn already has a significant number of high density low income residents.
- Piecemeal infrastructure spending resolutions by the County to create the illusion that they are solving individual community challenges while in reality setting up a system where West Placer low density high income residents will reside with ADUs accepted for their affordable housing obligation, Auburn is targeted for high density low income residents, and rural residents are targeted to have clusters of high density to subsidize the County's shortfall in RHNA numbers without adequate infrastructure and services. Where is the infrastructure spending for those rural residents?

The County needs to pick up the tab for their default through hybrid solutions that include county owned properties, specific plans, an amendment to the Sunset Area Plan and new development. The County should ask for an extension from the state. Pay your bills.

Thank you for the opportunity to provide feedback. Please include my comments as part of the Administrative Record,
Cheryl Berkema

Placer County Resident

LETTER 50: CHERYL BERKEMA

Response to Comment 50-1

Please see Master Response 1 – Non-EIR/Administrative Issues. Please see Responses to Comment Letter 45.

Letter 51

From: Steven Berry
To: Placer County Environmental Coordination Services
Subject: Urban interface
Date: Thursday, February 15, 2024 7:06:21 PM

Good evening,

51-1 I applaud the county in regards to the building of low income housing and for the new laws being enacted to change the outrageous rental and housing costs here in California, however I am quite dismayed that many of these developments are being building in a high density way in areas where there is a high or moderate chance of fire. To me that is concerning. I also noticed that there seems to be an excess of housing in the moderate high price range and the low income is far too low. Could there be a voucher program to house these in those vacant properties so that housing is just wasted because it's too expensive? The goal is to house people affordably while understanding the complexity of our future needs like energy our health and access to safe living spaces knowing that our environment is changing in ways where extreme weather events that were once unheard of or considered one in a thousand year events are happening quite regularly here and abroad. To safeguard these low income families

51-2 that need advocacy I can only ask that you heed the warnings of science and when you build in the urban interface you make changes that allow the density to exist and expand in a way that negates a paradise or Maui incident from ever happening again. I think we need to bury all of the power lines in these developments and we needs to have safe clearer spaces that are fire Marshall approved both in building hardiness and safe spaces to negate a bad drought season and the woes that it brings. I hope a transit system can be built as well in conjunction with these developments to truly link these less fortunate individuals with their respective

51-3 communities so that they can thrive in the best way. Having readily available transportation from low income communities to city centers is proven to reduce traffic congestion, it increases the health of the residents and it allows them to work and educate themselves in a environmentally friendly healthy and cost effective way. Please incorporate easy access to

51-4 green technology whenever you can as well and if you can use plastic piping so that these residents can also enjoy water free from toxicities.

Thanks again,
Steven Berry

LETTER 51: STEVEN BERRY

Response to Comment 51-1
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, as discussed under Impact 10-3 in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, although 32 of the 72 rezone sites evaluated in the Draft EIR are located within a High or Very High FHSZ, given compliance with all applicable local and State requirements, future reasonably foreseeable residential development potentially resulting from the proposed project would not exacerbate wildfire risks.

Response to Comment 51-2
Please see Response to Comment 51-1.

Response to Comment 51-3
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 33-2.

Response to Comment 51-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 52

From: Kally Kedinger-Cecil
To: darlene bettencourt; Frank Udvarhely; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Subject: RE: Rezoning Granite Bay
Date: Tuesday, March 12, 2024 3:43:58 PM
Attachments: image001.png

Hello,

Thank you for your comments. They will be incorporated into the project record. Additional information on the rezone program is available here: Housing needs rezone program | Placer County, CA

Regards,

Kally Kedinger-Cecil
Senior Planner
Placer County Planning Services Division
kkedinge@placer.ca.gov
530-745-3034

From: darlene bettencourt <dgbettencourt@msn.com>
Sent: Monday, March 11, 2024 4:50 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Frank Udvarhely <fudvarhely@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>
Subject: Fw: Rezoning Granite Bay

From: darlene bettencourt <dgbettencourt@msn.com>
Sent: Monday, March 11, 2024 11:21 PM
To: CindyGustafson@placer.ca.gov <CindyGustafson@placer.ca.gov>; JHolmes@placer.ca.gov <JHolmes@placer.ca.gov>; SupervisorGore@placer.ca.gov <SupervisorGore@placer.ca.gov>; Slandon@placer.ca.gov <Slandon@placer.ca.gov>; Suzanne Jones <suzannejones@placer.ca.gov>
Subject: Rezoning Granite Bay

Supervisors Gustafson, Holmes, Gore, Slandon and Jones,

52-1 I am writing to you to express sincere concerns re the planned rezoning of property 26 at 8989 Auburn Folsom rd and property 34 on Auburn Folsom Rd., housing up to 357 multi-story

52-1 cont.

low-income units. This is not about low-income housing; this is about the location and impact this high-density development would have on the community of Granite Bay. I live in Hidden Lakes, Granite Bay and drive Auburn Folsom corridor daily along with thousands of others who live here or commute through this area. I am very familiar with the traffic patterns that exist today. The impact of potentially 700plus more vehicles with multiple trips per day would dramatically change the already heavy traffic in this area, impacting 3 major intersections at Eureka, Fuller, and Douglas, also impacting Cavitt Junior High, and Folsom State Park traffic which presently backs down Douglas past Auburn Folsom Rd. This project would also impact tourism to include both State Parks and thousands of cycling enthusiasts that come here to bike Folsom, Granite Bay and Auburn. The neighborhoods of Oak Knoll, Lakeridge, Lakeland, Lakeview and Hidden Lakes are at times landlocked now. We often wind through adjacent neighborhoods to get to our homes during the summer, with Folsom Lake traffic. Existing neighborhoods would definitely be inundated with overflow and cut through traffic trying to avoid the Auburn Folsom parking lot created by this added volume of vehicles.

The new residents that would occupy this property would likely be commuters unless there are 700 jobs available in Granite Bay. Could you please seriously take another look at this project. I don't think Granite Bay residents deserve the negative and detrimental impacts forced upon them by this decision. I would hope that Auburn Folsom Road does not turn into a Bidwell Parkway planning disaster. There are other locations that would be less impactful to existing residents, traffic flows and neighborhoods....especially when this is clearly a location that would require commuting. Is that smart PLANNING?

52-2

Another concern of course is the wildlife habitat that exists on lot 26. Eagle habitats, herds of deer, wetlands, and fisheries. Eagles in fact fly over my home, not too far away, almost daily. Fish and Game and The Audubon Society should definitely be contacted. It is my understanding after the March 7th meeting, there is a rush to expedite this project and proper and thorough EIRs have not been done.

52-3

Planners have a very important job. The decisions that are made cannot be undone. Please revisit the decision on sites 26 and 34 and consider the impacts of that decision. Would appreciate your help and input.

Regards,

Darlene Bettencourt
8522 Hidden Lakes Dr.
Granite Bay, Ca. 95746

LETTER 52: DARLENE BETTENCOURT

Response to Comment 52-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Please see Master Response 4 –Traffic Safety.

Response to Comment 52-2

Rezone Site #26 is located on the east side of Auburn Folsom Road immediately south of Fuller Drive in Granite Bay. To the north, east, and west are fully developed commercial, residential, and school (Cavitt Middle School) uses. Linda Creek traverses the eastern boundary of the parcel flowing from the NE to SW generally (bordering the shared property line with the school).

Rezone Site #26 is located within the "Potential Future Growth" of the PCCP. The PCCP Land Cover designation is Oak Woodland-Savanna, Urban/Suburban, and Valley Foothill Riparian Woodland (that corresponds to Linda Creek). The Stream System Setback for avoidance and minimization of Linda Creek in this location is 100 feet from the Ordinary High Water Mark on both sides of Linda Creek. An additional 50-foot setback is required from the limits of adjacent riparian vegetation.

The PCCP and its Avoidance, Minimization, and Mitigation Measures would apply to any development project proposed on this site. A RHNA designation does not trigger federal Endangered Species Act (ESA) or wetland permitting. Any potential future development project, whether for RHNA housing or other development, including something as small as a single-family residence, would be subject to the PCCP and its requirements. At this time, a development project, improvement plans, or other land use entitlement has not been prepared to review.

Following are a few of the PCCP's conditions on covered activities that would apply to a development proposal (see Chapter 4 of this Final EIR, which includes the MMRP, for a complete listing of the PCCP mitigation measures, as well as Chapter 5, Biological Resources, of the Draft EIR):

- As required by Mitigation Measure 5-3(a), PCCP Section 6.3.2.2.1 Community Condition 2.1, Riverine and Riparian Avoidance, provides that Riparian can be credited as avoided and a project will not be assessed special habitat fees if the project does not modify any area within a buffer that extends 50 feet from the outermost bounds of the riparian vegetation.
- As required by Mitigation Measure 5-3(b), PCCP Section 6.3.2.2.2, Community Condition 2.2, Minimize Riverine and Riparian Effect, provides that where riverine and riparian constituent habitat avoidance is not feasible, Covered Activities shall minimize effects on riverine and riparian habitat by following design, construction and operations minimization

measures (e.g. best management practices [BMPs], low impact developments [LIDs], etc.).

- As required by Mitigation Measure 5-4(i), PCCP Section 6.3.3.1 Stream System Condition 1, Stream System Avoidance and Minimization, requires "design and implement Covered Activities in such a way as to avoid and minimize adverse effects on the Stream System."
- PCCP Section 3.2.7 Stream System provides that Linda Creek is designated as a named USGS blueline stream and therefore the Stream System is any area within the FEMA 100-year floodplain or 100 feet from the Ordinary Highwater Mark of Linda Creek whichever is greater. Any work within Rezone Site #26 would be required to comply with PCCP Stream System Condition 1, as required by Mitigation Measure 5-4(j), as well as PCCP Species Condition 7: Salmonids, which has specific measures for work in and adjacent to salmonid streams. The foregoing measures have already been approved by the National Marine Fisheries Service (NMFS) through the approval of the PCCP.

The Western Placer County Aquatic Resources Program's wetland/waters avoidance, minimization, and mitigation requirements (Placer County Aquatic Resources Program [CARP] Chapter 6) provides that onsite avoidance and minimization are required within and adjacent to the Stream System. In the case of Rezone Site #26, the seasonal wetlands located adjacent and that are connected to the stream system fall within the buffer and would be required to be avoided and impacts minimized through implementation of BMPs and LID associated with project design and construction.

Regarding eagles specifically, please see Response to Comment 30-3.

Response to Comment 52-3

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 53

From: darlene bettencourt
To: Placer County Environmental Coordination Service
Subject: Re: Rezoning Granite Bay
Date: Thursday, March 7, 2024 1:37:27 PM

53-1

I would like to expand on the previous e-mail below. Even though Bidwell Parkway is a different county, I think it is a good example of PLANNING gone terribly wrong. The problem is....once it's done, there is no turning back. I hope that Placer County Planners are better than this. Please, we don't need Auburn Folsom to be another Bidwell Parkway. Your job is so very important and impacts hundreds of thousands of people. Please take another look. If you live and travel this area you HAVE to agree that this project would be detrimental and negatively impact our lives here and those that travel through this area. It would also impact tourism and the State Park which is a single lane road into the park...and the thousands of cyclists who flood this area between Folsom, Granite bay and Auburn. There are less impactful areas to build high density housing. Please be considerate of the residents who live here.

Respectfully,

Darlene Bettencourt
Granite Bay

From: darlene bettencourt <dgbettencourt@msn.com>
Sent: Thursday, March 7, 2024 4:46 AM
To: cdraecs@placer.ca.gov <cdraecs@placer.ca.gov>
Subject: Rezoning Granite Bay

53-2

The rezoning at Fuller and Auburn Folsom is simply irresponsible . Three intersections that are very close together will be heavily impacted at Auburn Folsom.... Eureka , Fuller, and Douglas, as well as the traffic of Cavitt Junior High .... AND the Folsom State Park traffic which presently backs up past Douglas. This area is already a parking lot at peak times. How do those of us living in the developments off Douglas near the lake get to our homes... Hidden Lakes Estates, Lake view , Lakeridge, and Oak Knoll. Presently we must wind through adjacent neighborhoods to get home when traffic is backed up on Douglas. This is not right ... these new residents will be commuters unless you can come up with 600 new jobs in Granite Bay !!! Really !! This is wrong for our community . Are we going to become another Bidwell Parkway disaster ?.... Sure looks that way . I drive Douglas and Auburn Folsom everyday along with thousands of others..... whose day will get a whole lot longer ... please reconsider based on the impact this would have on our lives here.

Darlene Bettencourt
Granite Bay

LETTER 53: DARLENE BETTENCOURT

Response to Comment 53-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 53-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 52-1.

Letter 54

From: darlene bettencourt
To: Kelly Kerlinger-Cecil; Frank Udvarhelyi; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Subject: Fw: Rezoning Granite Bay
Date: Monday, March 11, 2024 4:50:29 PM

From: darlene bettencourt <dgbettencourt@msn.com>
Sent: Monday, March 11, 2024 11:21 PM
To: CindyGustafson@placer.ca.gov <CindyGustafson@placer.ca.gov>; JHolmes@placer.ca.gov <JHolmes@placer.ca.gov>; SupervisorGore@placer.ca.gov <SupervisorGore@placer.ca.gov>; Slandon@placer.ca.gov <Slandon@placer.ca.gov>; Suzanne Jones <suzannejones@placer.ca.gov>
Subject: Rezoning Granite Bay

Supervisors Gustafson, Holmes, Gore, Slandon and Jones,

54-1 I am writing to you to express sincere concerns re the planned rezoning of property 26 at 8989 Auburn Folsom rd and property 34 on Auburn Folsom Rd., housing up to 357 multi-story low-income units. This is not about low-income housing; this is about the location and impact this high-density development would have on the community of Granite Bay. I live in Hidden Lakes, Granite Bay and drive Auburn Folsom corridor daily along with thousands of others who live here or commute through this area. I am very familiar with the traffic patterns that exist today. The impact of potentially 700plus more vehicles with multiple trips per day would dramatically change the already heavy traffic in this area, impacting 3 major intersections at Eureka, Fuller, and Douglas, also impacting Cavitt Junior High, and Folsom State Park traffic which presently backs down Douglas past Auburn Folsom Rd. This project would also impact tourism to include both State Parks and thousands of cycling enthusiasts that come here to bike Folsom, Granite Bay and Auburn. The neighborhoods of Oak Knoll, Lakeridge, Lakeland, Lakeview and Hidden Lakes are at times landlocked now. We often wind through adjacent neighborhoods to get to our homes during the summer, with Folsom Lake traffic. Existing neighborhoods would definitely be inundated with overflow and cut through traffic trying to avoid the Auburn Folsom parking lot created by this added volume of vehicles.

The new residents that would occupy this property would likely be commuters unless there are 700 jobs available in Granite Bay. Could you please seriously take another look at this project. I don't think Granite Bay residents deserve the negative and detrimental impacts forced upon them by this decision. I would hope that Auburn Folsom Road does not turn into a Bidwell Parkway planning disaster. There are other locations that would be less impactful to existing residents, traffic flows and neighborhoods....especially when this is clearly a location that would require commuting. Is that smart PLANNING?

54-2 Another concern of course is the wildlife habitat that exists on lot 26. Eagle habitats, herds of deer, wetlands, and fisheries. Eagles in fact fly over my home, not too far away, almost daily.

54-2 cont. Fish and Game and The Audubon Society should definitely be contacted. It is my understanding after the March 7th meeting, there is a rush to expedite this project and proper and thorough EIRs have not been done.

54-3 Planners have a very important job. The decisions that are made cannot be undone. Please revisit the decision on sites 26 and 34 and consider the impacts of that decision. Would appreciate your help and input.

Regards,

Darlene Bettencourt
8522 Hidden Lakes Dr.
Granite Bay, Ca. 95746

LETTER 54: DARLENE BETTENCOURT

Response to Comment 54-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 52-1.

Response to Comment 54-2
Please see Response to Comment 52-2.

Response to Comment 54-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 55

From: Darlene bettencourt
To: Placer County Environmental Coordination Services
Subject: Rezoning Granite Bay
Date: Wednesday, March 6, 2024 8:46:08 PM

55-1

The rezoning at Fuller and Auburn Folsom is simply irresponsible . Three intersections that are very close together will be heavily impacted at Auburn Folsom.... Eureka , Fuller, and Douglas, as well as the traffic of Cavitt Junior High .... AND the Folsom State Park traffic which presently backs up past Douglas. This area is already a parking lot at peak times. How do those of us living in the developments off Douglas near the lake get to our homes... Hidden Lakes Estates, Lake view , Lakeridge, and Oak Knoll. Presently we must wind through adjacent neighborhoods to get home when traffic is backed up on Douglas. This is not right ... these new residents will be commuters unless you can come up with 600 new jobs in Granite Bay !!! Really !! This is wrong for our community . Are we going to become another Bidwell Parkway disaster ?.... Sure looks that way . I drive Douglas and Auburn Folsom everyday along with thousands of others..... whose day will get a whole lot longer ... please reconsider based on the impact this would have on our lives here.

Darlene Bettencourt
Granite Bay

LETTER 55: DARLENE BETTENCOURT

Response to Comment 55-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 52-1.

Letter 56

From: Marie Blomgren
To: Placer County Environmental Coordination Services
Subject: Fuller Road Property, Granite Bay
Date: Friday, March 8, 2024 12:28:03 PM

56-1 I am requesting that property next to Cavitt School in Granite Bay to be taken off the list for zoning and to repeal the apartment construction. Fuller Road and Folsom Auburn Road are already heavily impacted with traffic and pedestrians. It truly would create a safety risk with the high density housing.

56-2 On top of that, the property is a home to our wildlife that need to co-exist in our semi-rural area.

56-3 Please reconsider this high density housing location.

Most sincerely,
Marie Blomgren
Loomis/Granite Bay Resident for 52 years

LETTER 56: MARIE BLOMGREN

Response to Comment 56-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 56-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 52-1.

Response to Comment 56-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 57

From: Daniel Bojckov
To: Placer County Environmental Coordination Services
Date: Thursday, March 14, 2024 9:18:35 PM

57-1 Two separate individuals from each other, one real estate agent, the other appraisal specialist both confirmed that if the rezoning succeeds any Morgan Creek/Morgan Greens home proprietor will automatically lose between $80 - $150 000 from its home value because of the surrounding comparison method. This is excluding the proposed golf course development. Who is going to compensate us?
Daniel Bojckov
9210 Eagle Springs Pl, Roseville, CA 95747

LETTER 57: DANIEL BOJCKVOV

Response to Comment 57-1

Please see Master Response 2 – Social and Economic Impacts.

Letter 58

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: protest against 8830 Cook Riolo rd. and Vineyard rd. development
Date: Tuesday, February 27, 2024 8:21:59 AM

From: Planning Commission <planningcommission@placer.ca.gov>
Sent: Friday, February 23, 2024 2:53 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; COB <COB@placer.ca.gov>; Sari Husmann <shusmann@placer.ca.gov>
Subject: FW: protest against 8830 Cook Riolo rd. and Vineyard rd. development

I believe he is referring to the "Housing Needs Rezone Program" (PLN22-00476) that went to hearing 2/22.

Kitty

From: Daniel Bojckov <dbojckov9@gmail.com>
Sent: Friday, February 23, 2024 2:48 PM
To: Planning Commission <planningcommission@placer.ca.gov>; Placer County Clerk <Clerk@placer.ca.gov>; Placer County Postmaster <PostMaster@placer.ca.gov>
Subject: protest against 8830 Cook Riolo rd. and Vineyard rd. development

58-1

We are Daniel Bojckov and Radostina Georgieva residents of 9210 Eagle Springs Pl, Roseville, CA 95747.
On behalf of nine immediate households surrounding ours, we are writing to Placer county planning commission Board to express our emphatic stand against any 8830 Cook Riolo road and Vineyard road development. Our main concern is the serious and sharp increase of criminal activities, pollution, dense traffic, noise, environmental jeopardy etc. Low income housing across our elementary school is absurd, mildly speaking! The current infrastructure of the said lots, ROADS, power, etc are not suitable for such a development. There are zillion more arguments in support of our protest as you'll hear them from other individuals.
Please take our position on this issue under consideration and acknowledge receipts of this correspondence.
Respectfully yours
Daniel Bojckov

LETTER 58: DANIEL BOJCKOV

Response to Comment 58-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 59

From: Nicholas Boliard
To: Placer County Environmental Coordination Services
Subject: HOUSING NEEDS REZONE PROGRAM - The Draft Environmental Impact Report - Public Comment
Date: Wednesday, March 6, 2024 8:56:32 AM

Hello,

I am writing to you to express my concern about the proposed rezoning of Dry Creek site 9 and 10.

59-1 The proposed rezoning is directly across from an elementary school and the traffic congestion during the week on our narrow single lane roads is already an issue for residents. By adding 92-138 units on this relatively small parcel of land, there will be a significant increase in traffic in the area.

59-2 Also, as I am sure you know Dry Creek is one of the gem's of Placer County and a protected Chinook Salmon habitat. High Density housing so close to the creek may present dangers to this ecosystem and the local environment generally.

59-3 While I understand that California and Placer County needs more housing units, there are areas that have better access to infrastructure, employment and public services that are more suited for this kind of development.

I have been a Placer County resident my entire life, and it has been a blessing to be a part of such a beautiful and dynamic community that has preserved its strengths while growing thoughtfully. I hope you take the opportunity to reconsider the proposed rezoning of Dry Creek site 9 and 10

Nicholas Boliard

3135 Silky Oak Drive

Roseville, CA 95747

916-462-1169

—
Nicholas Boliard
nboliard93@yahoo.com

This message and any attachments may contain confidential or privileged information and are only for the use of the intended recipient of this message. If you are not the intended recipient, please notify the sender by return email, and delete or destroy this and all copies of this message and all attachments. Any unauthorized disclosure, use, distribution, or reproduction of this message or any attachments is prohibited and may be unlawful.

LETTER 59: NICHOLAS BOLIARD

Response to Comment 59-1
Please see Responses to Comment Letter 4.

Response to Comment 59-2
While a few rezone sites are located adjacent to tributaries to Dry Creek, none of the proposed rezone sites are located adjacent to Dry Creek itself. It is noted that Chapter 5, Biological Resources, of the Draft EIR includes Mitigation Measure 5-2(j) to protect special-status salmonids should any construction occur within their habitat. For example, Mitigation Measure 5-2(j) requires compliance with PCCP Species Condition 7: Salmonids, which has specific measures for work in and adjacent to salmonid streams. These measures have already been approved by the National Marine Fisheries Service (NMFS) through the approval of the PCCP.

Response to Comment 59-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 60

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: North Placer Rezone -Site 71 & 72
Date: Friday, March 8, 2024 8:47:34 AM

-----Original Message-----
From: Walter Boswell <wjb4000@gmail.com>
Sent: Thursday, March 7, 2024 10:46 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: North Placer Rezone -Site 71 & 72

60-1 I want to lodge my protest to rezoning this area for high density housing. Allowing this type development in this area will not only overload the infrastructure in the area but drastically increase the risk of deadly, devastating fires. This is the wrong proposal for the area and the rezoning should be denied.

Walter Boswell
10438 Bar Ranch Rd
Auburn, CA. 95603

LETTER 60: WALTER BOSWELL

Response to Comment 60-1

Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, potential impacts of the proposed project related to wildfire hazards are discussed in Chapter 10, Fire Protection and Wildfire, of the Draft EIR.

Letter 61

From: S Bransen
To: Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Kelly Kedinger-Cecil; Frank Udvarhelyi; Placer County Environmental Coordination Services; Bonnie Gore; Board Clerk; Planning Commission
Cc: Brad Bransen
Subject: Please Do Not Approve the Rezoning of 8989 Auburn Folsom Road next to Cavitt Junior High for a 4 story residential building
Date: Monday, March 18, 2024 8:38:15 AM

Dear Placer County Board of Supervisors,

61-1 We are writing to request that rezoning 8989 Auburn Folsom Road next to Cavitt Junior High to allow for a 4 story residential building be denied. Should this project be approved it will have serious negative impacts affecting the safety and environment of Granite Bay residents, the students at Cavitt Stallman Jr. High and the surrounding community.

The following are our specific concerns in light of the fact that Granite Bay is an unincorporated area with less resources as its surrounding communities such as Roseville to handle the future implications of a project of this magnitude:

61-2
- Given the documented lack of existing funding, we are concerned there is not adequate police, fire and sheriff funding in place for the additional resources required to handle the increase in population and other impacts associated with a project of this size. The County Board of Supervisors has already approved many large scale housing projects bringing in new residents to Granite Bay knowing that there is inadequate funding to accommodate the associated impacts of this increase in population.

61-3
- The project will increase traffic at Auburn Folsom Road, Cavitt Stallman, Joe Rodgers, Barton and Douglas Blvd, which are already very busy increasing safety and other risks. There have already been numerous fatalities and many car accidents on Douglas Blvd as is well documented.

61-4
- There is not adequate infrastructure in place to accommodate these additional residents. Planning and funding for this infrastructure will take years after this project is approved and increase the likelihood for other rezoned properties - creating a precedence for future approvals impacting the rural environment and residents of Granite Bay and Loomis.

We respectfully request that this project not be approved.

Thank you,

Brad and Susan Bransen
6850 Itchy Acres Road
Granite Bay, CA 95746

LETTER 61: BRAD BRANSEN AND SUSAN BRANSEN

Response to Comment 61-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 61-2
Potential impacts associated with the proposed project related to public services such as police and sheriff protection are discussed in Section XV of the Initial Study prepared for the proposed project. As discussed therein, given payment of all applicable fees, impacts related to public services would be less than significant. In addition, please see Response to Comment 25-2.

Response to Comment 61-3
Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Please see Master Response 4 –Traffic Safety.

Response to Comment 61-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 62

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:31:30 AM

-----Original Message-----
From: Babette Breisacher <babs07@sbcglobal.net>
Sent: Friday, March 8, 2024 7:35 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

62-1 I am sending this letter to you as I am very concerned about the Placer County Housing Element Amendment.

I did not write the below information myself but I am in total agreement! Like most involved, I wish to voice my objection to what is happening in the Dry Creek community!!

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

62-2 1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

62-3 2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues). The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

62-4 3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

62-5 4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

62-6 For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Thank you for hearing my concerns!

Babette Breisacher

LETTER 62: BABETTE BREISACHER

Response to Comment 62-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 62-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 62-3
The project's potential impacts related to utilities infrastructure are addressed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project. See also Response to Comment 81-3 regarding sewer concerns, and note that any future residential development on rezone sites within the Dry Creek area would be required to connect to public water, supplied by CAL AM from the Placer County Water Agency (PCWA), which, according to Table 5 of the Initial Study (Appendix A of the Draft EIR), has ample water supplies available to serve reasonably foreseeable future development during normal, dry, and multiple dry years through 2040.

Impacts related to flood hazards are addressed in Section X, Hydrology and Water Quality, of the Initial Study prepared for the proposed project. As discussed therein, future development of any rezone sites located within a FEMA Flood Hazard Zone would be required to comply with several General Plan policies related to flood hazards as well as Article 15.52, Flood Damage Prevention Regulations, of the Placer County Code, which is intended to minimize public and private losses due to flood conditions, including where public facilities and utilities are located within areas of special flood hazard. In addition, if future development on the rezone sites is anticipated to occur within the 100-year floodplain, a CLOMR would be required to be submitted to FEMA to update the floodplain information to reflect the proposed conditions. Therefore, potential impacts related to flood hazards have been adequately addressed in the Draft EIR.

In addition, the County disagrees that the District 1 sites are not appropriate for the RM30 rezoning.

Response to Comment 62-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 62-5
Please see Master Response 1 – Non-EIR/Administrative Issues. The County disagrees with the assertion that the public was not adequately informed of the rezone project. Housing Element Appendix F, Page F-11 details the outreach conducted during the rezone program. The Dry Creek Elementary School District has been included in the distribution list to receive notices including notices for the Notice of Preparation to receive comments on the scope of the EIR and for the Notice of Availability for the Draft EIR.

Response to Comment 62-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 63

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Service
Subject: FW: Dry Creek Community Rezoning
Date: Thursday, March 7, 2024 10:33:27 AM

-----Original Message-----
From: Babette Breisacher <babs07@sbcglobal.net>
Sent: Wednesday, March 6, 2024 8:15 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Dry Creek Community Rezoning

Dear Ms. Kedinger-Cecil

Thank you for reading my email and for hearing my concerns.

My family and I first moved to Roseville in 1987. We moved into an existing neighborhood of 3 acre parcels, Bianchi Estates 2. We chose this neighborhood for its rural atmosphere as well as the excellent school district. Both of our children completed their education at the Dry Creek schools, as well as Woodcreek Oaks High School.

I am sharing this with you, because, fast-forward, our oldest daughter and husband chose the Dry Creek community to raise their children in this rural and safe environment.

Now to what is happening at this point in time.

Concerning to me are the high density population proposals that are currently under consideration.

I am wondering since this is such an old established community, why it would not want to be preserved?

63-1

Dry Creek is such a special place, with its rolling hills, beautiful trees, awesome sunsets, and the quietness and beauty of Dry Creek, with its waters flowing so beautifully.

With so much open land being developed into new neighborhoods and shopping areas near Fiddyment/Baseline, why these high density units could not be planned in those open parcels as part of the overall plan? The new residents that would be moving into that area would be fully aware of the plans for their new community.

The residents in the Dry Creek Community do not have that luxury. They have worked many for their homes in an environment that they chose. It seems very unfair to have their neighborhood change so dramatically. They have been good stewards of their properties. Not only will their rural way of life change, their property values may plummet… Especially those in direct proximity to the high density units being proposed.

There is a brand new neighborhood near one of these proposed parcels. The new owners of these homes also have been blindsided by these new high density unit proposals. How would you feel if you just moved into your new home only to be told that next door are going to be high density apartments? Why were they not told of this impending proposal? So not only is this proposal affecting long-term Dry Creek residents and homeowners, it is also affecting brand new homeowners totally unaware of plans directly affecting them.

63-2

Having 20 to 30 units per acre in a rural community will cause havoc on the school system, transportation on the small country roads, safety for the children riding their bikes and walking to school, neighbors walking and enjoying the countryside, etc. Also having so many people packed into such a small amount of land, directly across the street from a pre-K through 8th grade school may potentially cause more traffic accidents and other dangerous issues.

63-3

Another item that I think may have been overlooked is the noise pollution with so many units on such small parcels … again impacting the existing community members.

63-4

Please, please walk this neighborhood, talk with the residents about why this community is so special and why preserving it is so important.

Again, thank you for taking the time to read my email, and for allowing me to voice my concerns.

Please contact me if I can be of any help.

Babette Breisacher

Sent from my iPhone

LETTER 63: BABETTE BREISACHER

Response to Comment 63-1
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 63-2
Please see Master Response 4 – Traffic Safety and Master Response 6 – Impacts to Local Schools.

Response to Comment 63-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 63-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 64

February 9, 2024

Subject: Housing Element Sites Rezone Project
- Proposed construction of low-income housing in the forest area near our residence in Auburn, on Taylor Lane. The proposed site is 12.8 acres, No. 34 on your property map (APN: 038-104-095-000).

To Whom This May Concern,

My name is James Brennan. In this letter, I am speaking as the voice of my family and fellow neighbors on Taylor Lane in Auburn CA. We hope you take this letter to heart and consider our deep concerns over the disturbing news about the proposed development near our peaceful homes and neighborhood. To be clear, the need for affordable housing is important and we support the initiative however, it is vital to strike a balance when developing new housing. A balance between respecting the environment as well as the citizens who live within the area.

64-1 There are many things in place to ensure the environment is protected and respected. These issues will be brought forward later in respect to the EIR. What about the citizens? What about those of us who spend our entire lives working hard to make a peaceful home? What about the property taxes, price of housing, and cost of living? Well, we work hard to earn the money to pay for these things because the area we live in is worth it. This proposed development in Lot No. 34 will ultimately destroy everything we hold dear. The beautiful nature next to us and the peace we enjoy.

I am a US Army Veteran, a Peace Officer, a Father, and a Husband. My family and I moved back to Auburn after serving in Active duty. We had nothing. I was unemployed and started from the bottom. I worked 2 jobs and served in the reserves while going to college in hopes of finding a career that would support my family and provide enough income to stay close to Placer and Nevada County where our families live. We now live at 1220 Taylor Lane at the end of the street and share our property line with Lot No. 34.
Since I joined the Army at the age of 22 my life has been chaos. Being a combat veteran suffering from PTSD and several severe injuries, all I wanted was to have a peaceful home to raise a family. Our dreams came true when we finally bought this home 4 years ago. I spend all my free time working on my home to make it a comfortable and peaceful place to live my life in peace. This lot next to us (No. 34)

plays a major part in the peace that we and our neighborhood enjoy. The trees, creek, and animals provide a level of peace and serenity that drowns out the light and noise pollution from nearby developed areas. This area is the main reason we worked so hard to live here and pay the higher prices of real estate and cost of living. Without the beautiful nature area, our home and property would lose all its character and sense of peace and separation from the chaos. We cannot lose this.

64-2

It is imperative that the needs of the residents be taken into consideration. We have a right to enjoy our properties, our homes, and the land around it that makes our little neighborhood a small paradise. We are all begging you to consider the fact that a low-income housing development on this lot will destroy the quality of life for us tax-paying, hard-working residents. I and many other residents will plead with you to show consideration and respect when making these decisions. This is our home and we will fight to maintain our rights to enjoy our properties even if we are forced to pursue legal action. Let us hope that it doesn't come to that.

64-3

In summary: The proposed development in lot No. 34 would indeed provide low-income housing in the future, but in turn, will destroy an important part of nature, homes to many creatures, and the quality of life for all surrounding residents by being a permanent private and public nuisance.

Sincerely,
James Brennan

LETTER 64: JAMES BRENNAN

Response to Comment 64-1
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 64-2
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 64-3
Please see Master Response 2 – Social and Economic Impacts.

Letter 65

From: Jennifer Brooks
To: Board Clerk; Placer County Environmental Coordination Services; Suzanne Jones; Landon Wolf; Shanti Landon; Michael Spelis; BOS@placer.ca.gov; Frank Udvarhelyi; Cindy Gustafson; Kathryn Kenover; Beverly Roberts; Jarrett Rodgers
Subject: Granite Bay Resident Objection re Zoning Project.
Date: Sunday, March 17, 2024 4:17:22 PM
Attachments: eScholarship UC item 487994z4 (1).pdf
Affordable Housing and Transportation Materials.docx

My name is Jennifer Rodgers (resident of Granite Bay) and I am writing to further supplement my objection to the re-zoning of Auburn-Folsom and Douglas (Granite Bay) for affordable housing.

65-1 The below comments are in response to the Draft EIR. I implore the Board to read the EIR critically. The EIR is not an unbiased report of fact. Rather a persuasive piece of writing to persuade the Board into believing that the decisions at hand will not impact the environment, residents, or future residents significantly.

However, even a cursory review of the document shows its biases, misrepresentations, and omissions.

I. **Transportation**.

1. **Pedestrian and Bicycle paths in Granite Bay are not modes of commuting**.

65-2 The EIR focuses on Pedestrian and Bicycle pathways which in an urban area is common sense and something to be considered. However, Granite Bay is not an urban area. It is a semi-rural town. The Pedestrian and Bicycle paths are not intended for commuting or for human crossways to traverse a city. The Pedestrian and Bicycle paths are intended for nature walks, mountain biking, hiking, etc. They are in place to be minimally invasive to the natural surroundings in the area. The idea that the Granite Bay Pedestrian and Bicycle walkways are meant for commuting and large public use – is disingenuous and a misrepresentation of fact.

2. **Contrary to the EIR, the re-zoning at the Auburn/Folsom – Douglas Intersection (including site 26) will have a devastating impact on vehicle safety**.

65-3 The EIR is blatantly wrong to conclude that there is a less than significant substantial increase to vehicle safety due to a dangerous intersection state. The basis for the EIR's conclusion is that there are a number of initiatives and coordination with the CHP for traffic enforcement. The EIR's reasoning is completely baseless. The issue is not initiatives/coordination efforts with the CHP. The indisputable fact is that the Auburn Folsom/Douglas corridor is a dangerous intersection and a main thoroughfare for not only commutes (traversing from Rocklin/Roseville/Lincoln to El Dorado/Folsom/HW 50) but also for Folsom Lake boaters. You could have 100 initiatives and the whole US Army to patrol the area, and it would still be a dangerous intersection. The intersection is just a death- trap for a lack of words. In almost every direction – cars that are making left-hand turns are cross two-lanes (sometimes three (ie. exiting the Speedway) on-coming traffic that could be traveling 50 mph or higher. To think that the intersection could accommodate 500+ cars – is asking for more deaths, dismemberment, and injuries.

65-4

3. **Contrary to the EIR, the re-zoning at the Auburn/Folsom – Douglas Intersection (including site 26) will have a devastating impact on Emergency Access**. The EIR only focuses on the number of access points, width of access points, and width of internal roadways. The issue is not the number of access points, width of access points, or width of internal roadways. The issue is that the intersection in question is already extremely busy. At times, things are at a standstill, especially during the summer for boat access. Emergency response times of seconds can mean the difference between life and death. To consider adding hundreds of cars to an already congested intersection is unconscionable. Further, citing the fact that under CA law drivers are to pull over to the side of the road is tone-deaf and irrelevant when in some places on those roads there is no space to pull over to make way. Truthfully, I would not be surprised if the County was named as a defendant in a wrongful death suit as a result of negligently adding additional cars to the already congested intersection, thereby making it more difficult (and thereby increase the response time) for emergency responders to access the lake.

II. **Miscellaneous**

65-5

1. **The EIR does not adequately advise the Board about Linda Creek**. Although the EIR does provide that Linda Creek is a habitat for Salmon, it fails to state that the Salmon are issue are endangered species that are protected under Federal Law, not just State law.

65-6

2. **The EIR does not adequately indicate that the Granite Bay sites are within Local Responsibility Areas**. This re-zoning plan is going to increase the costs of the county fire responsibility. As it is, our county is already struggling to pay and retain fire captains and staff.

65-7

3. **The Re-Zoning plan as conducted so far is setting our County and community up for failure**. I have included in this letter research backed information that low income housing is best suited in locations that are transit-oriented locations. Transit-Oriented planning is the most meaningful way to help those for whom the program is intended and for the communities. Granite Bay is in no way a Transit-Oriented location. To qualify as Transit-Oriented development, the housing development should be within a quarter-mile of transit stations. As indicted in prior correspondence, Granite Bay is at least 3 miles away from public transit. The County is ignoring research and guidelines of how to set these communities up for success simply because the County has failed to take these requirements from the State seriously. The residents of Granite Bay should not be punished for the incompetence of our Board of Supervisors. Case in point, why doesn't Placer County have a division of Transit-Oriented Development? Sacramento County does.

III. **Closing**.

65-8

1. I highly recommend the Board to truly consider what and how this project is progressing. This project is not going to help the community of Granite Bay. Rather, it is going to harm residents like myself in almost every aspect of life. This project is not going to help the intended target. What is the purpose of creating housing where those who it is intended for cannot afford to live there? Further, you are going against

65-8 cont.

countless research studies that provide a roadmap for success. Why is this Board ignoring that research? I know many of my neighbors are greatly upset with this re-zoning project. You are making a grave decision to move forward with the projects at the Auburn-Folsom intersection, including, without limitation, site 26.

UC Davis
White Papers

65-9

Title
Affordable Housing in Transit-Oriented Developments: Impacts on Driving and Policy Approaches

Permalink
https://escholarship.org/uc/item/487994z4

Authors
Boarnet, Marlon G
Bostic, Raphael
Williams, Danielle
et al.

Publication Date
2017-04-01

eScholarship.org Powered by the California Digital Library
University of California

Affordable Housing in Transit-Oriented Developments: Impacts on Driving and Policy Approaches

April 2017

A White Paper from the National Center for Sustainable Transportation

Marlon G. Boarnet, University of Southern California
Raphael Bostic, University of Southern California
Danielle Williams, University of Southern California
Raul Santiago-Bartolomei, University of Southern California
Seva Rodnyansky, University of Southern California
Andy Eisenlohr, University of Southern California

National Center for Sustainable Transportation

METRANS Transportation Center
USC | CSULB

About the National Center for Sustainable Transportation

The National Center for Sustainable Transportation is a consortium of leading universities committed to advancing an environmentally sustainable transportation system through cutting-edge research, direct policy engagement, and education of our future leaders. Consortium members include: University of California, Davis; University of California, Riverside; University of Southern California; California State University, Long Beach; Georgia Institute of Technology; and University of Vermont. More information can be found at: ncst.ucdavis.edu.

Disclaimer

The contents of this report reflect the views of the authors, who are responsible for the facts and the accuracy of the information presented herein. This document is disseminated under the sponsorship of the United States Department of Transportation's University Transportation Centers program, in the interest of information exchange. The U.S. Government and the State of California assumes no liability for the contents or use thereof. Nor does the content necessarily reflect the official views or policies of the U.S. Government and the State of California. This report does not constitute a standard, specification, or regulation.

Acknowledgments

This study was funded by a grant from the National Center for Sustainable Transportation (NCST), supported by USDOT and Caltrans through the University Transportation Centers program. The authors would like to thank the NCST, USDOT, and Caltrans for their support of university-based research in transportation, and especially for the funding provided in support of this project. The authors would also like to thank reviewers at the California Department of Housing and Community Development, California Department of Transportation, Governor's Office of Planning and Research, and the Strategic Growth Council for providing excellent review comments on preliminary versions of this white paper.



Affordable Housing in Transit-Oriented Developments: Impacts on Driving and Policy Approaches

A National Center for Sustainable Transportation Research Report

April 2017

Marlon G. Boarnet, Price School of Public Policy, University of Southern California
Raphael Bostic, Price School of Public Policy, University of Southern California
Danielle Williams, Price School of Public Policy, University of Southern California
Raul Santiago-Bartolomei, Price School of Public Policy, University of Southern California
Seva Rodnyanksy, Price School of Public Policy, University of Southern California
Andy Eisenlohr, Price School of Public Policy, University of Southern California

[page left intentionally blank]

TABLE OF CONTENTS

Introduction **1**
The Impact of TOD Affordable Housing on Vehicle Miles Traveled **2**
Will Affordable Housing in TODs Remain Affordable in the Long Run? **7**
Benefits and Costs of Affordable Housing near Transit **12**
Affordable Housing Policy Approaches for Transit-Oriented Developments in California **14**
Increase the Supply of Units, with a Strong Focus in TOD Areas 15
Increase Subsidies for Affordable Units in TODs and Near Transit 17
Take Steps to Reduce the Number of Affordable Units that Opt Out of Subsidies 19
Conclusion **19**
References **21**

NCST

Affordable Housing in Transit-Oriented Developments: Impacts on Driving and Policy Approaches

EXECUTIVE SUMMARY

This paper studies the intersection of policies promoting affordable housing, transit-oriented developments (TODs), and the reduction of vehicle miles traveled (VMT) in metropolitan areas. In particular, this paper focuses on the following questions:

1. Does locating affordable units in TODs increase or decrease VMT and thus emissions?
2. Is affordable housing in TODs still affordable in the long-term, i.e., beyond the expiration of the first minimum affordability period?
3. Do the benefits of affordable housing near transit outweigh the frequently higher costs of development in TODs?
4. What policy recommendations emerge from the analysis?

Existing research has shown that those who live within a TOD's radius (considered a half-mile in this paper) tend to have a lower VMT than if they lived elsewhere. Empirical data from the Los Angeles greater metropolitan area, analyzed within this paper, confirm this research finding. Nevertheless, and based on the same empirical data, the increase in transit ridership and the decrease in VMT for households living within a TOD's radius is not a straightforward relationship. For example, households with higher incomes tend to reduce their VMT by a greater amount than those with lower incomes; and households with lower incomes tend to increase their transit ridership by a greater amount than those with higher incomes.

The extent to which affordable housing in TODs may contribute to VMT reduction and social welfare goals depends on the amount of affordable housing that municipalities can offer. Whether affordable housing in TODs can remain affordable after any initial covenants expire also matters. Unfortunately, existing research shows that: (a) properties located near light rail appear to be more valuable, holding all else equal; and (b) landlords in areas where prices are increasing tend to "opt out" of renewing affordability covenants, when possible. As a result, the construction of affordable housing in TODs—areas that are likely to experience rising property values—may not convey long-term affordability benefits without proper regulations in place.

In addition, programs seeking to expand the amount of affordable housing may not offer sufficient financial incentives to real developers. A review of existing literature indicates land in TODs appears to be more expensive than land outside of TODs, which agrees with the premium of locating near light rail. Due to relatively fixed construction costs, additional up-front costs associated with affordable housing, and lower rent revenues from affordable housing than from market-rate housing, developers likely require subsidies larger than what are currently available via programs such as the federal Low-Income Housing Tax Credit (LIHTC) program.

While locating affordable housing in TODs may not provide developers with financial benefits, it appears to provide residents and their municipalities with multiple social benefits. As aforementioned, the inclusion of affordable housing in TODs appears to reduce household VMT for low-income families who otherwise would live outside TODs. It may also slow down the pace of gentrification and displacement in communities where transit stops are established. Finally, it should improve access to employment and other opportunities for lower income households.

After considering the literature and these facts presented, this paper recommends the following State policies to maximize social benefits:

1. **Increase the supply of affordable housing units, particularly in TODs**—in doing so, focus on relatively high-density figures and relatively low inclusionary zoning requirements.
2. **Offer more aggressive subsidies for the development of affordable rental housing units in TODs and near transit**—such increases could be funded by shifting existing subsidies from ownership units to rental units, or lowering the cap on mortgage interest deductions.
3. **Incentivize landlords to keep existing units affordable after initial covenants have expired**—this is especially true for Section 8 housing; potential policy changes could include: lengthening contract terms for landlords, reducing the administrative burden on landlords, and/or offering funds to defray the costs of housing Section 8 tenants.

With renewed focus on ways that housing and transportation policy intersect, and attention to the policy tools suggested in this paper, TODs can be part of the way forward toward a more environmentally friendly and economically just future California. While the low-income residents in TODs will not reduce their driving as much as higher-income residents, if both groups move to TODs from locations distant from transit, building TODs at higher densities can accommodate both low- and high-income residents and make substantial progress toward both VMT reduction and affordable housing goals.

Introduction

Transit-oriented development (TOD) is defined as "a type of community development that includes a mixture of housing, office, retail and/or other amenities integrated into a walkable neighborhood and located within a half-mile of quality public transportation" (Reconnecting America, n.d.) Affordable housing is defined by the U.S. Department of Housing and Urban Development as "housing for which the occupant(s) is/are paying no more than 30 percent of his or her income for gross housing costs, including utilities (HUD, n.d.b)." Affordable housing is frequently integrated into TODs because the two are perceived as complements for at least three reasons. First, including affordable housing presumably helps to temper the displacement and gentrification commonly assumed to follow in the wake of TOD. Second, incentivizing or mandating the inclusion of affordable housing in TODs not only provides lower-income families with particular socio-economic opportunities, such as better proximity to jobs, lower transportation costs, etc., but also increases the available stock of affordable housing, which is acutely needed in many communities.[1] Third, a policy imperative focusing on environmental sustainability has promoted the integration of affordable housing into transit-oriented developments, focusing particularly on the reduction of vehicle miles traveled (VMT).

The link between affordable housing and TOD's environmental goals is particularly strong in California. The state Greenhouse Gas Reduction Fund, an account which receives proceeds from the state's cap-and-trade auctions, funds the Affordable Housing and Sustainable Communities Program, which gives funding priority to producing and preserving affordable housing near transit stations as part of its efforts to reduce emissions and benefit disadvantaged communities (California Department of Housing and Community Development, n.d.). The Los Angeles Sustainability Plan (pLAn) reflects similar funding priorities (Los Angeles Office of the Mayor, 2015) and, in the Bay Area, state cap-and-trade revenues supplement the local Transit-Oriented Affordable Housing Fund which promotes equitable transit-oriented developments in part to assist low-income families reduce their transportation costs (Bay Area Transit-Oriented Affordable Housing Fund, n.d.)

This white paper reviews what is known about the relationship between TOD and affordable housing. We summarize the existing literature to determine whether the underlying assumptions that drive the inclusion of affordable housing in transit-oriented developments hold and to better understand the long-term implications of TOD-based affordable housing. We focus in particular on the following questions:

1. Does locating affordable units in TODs increase or decrease vehicle miles traveled and thus emissions?
2. Is affordable housing in TODs still affordable in the long-term, i.e., beyond the expiration of the first minimum affordability period?

[1] 5.9 million households in California are estimated to be cost burdened, i.e. they spend more than 30% of their household income in order to secure housing (Woetzel, et al., 2016). The majority of cost burdened Californian households (over 60%) reside either in the Los Angeles-Long Beach-Anaheim metropolitan statistical area (MSA) or within the Bay Area (Woetzel, et al., 2016).

3. Do the benefits of affordable housing near transit outweigh the frequently higher costs of development in TODs?
4. What policy recommendations emerge from the analysis?

This white paper is needed because, though existing research has explored various aspects of the relationship between TOD and affordable housing, the literature varies greatly in its use of methodological approaches, data, geography, and normative motivations. Furthermore, the assumptions regarding sustainability and the socio-economic benefits that underlie the linkage of these two development strategies, affordable housing and TOD, have not been fully investigated. In short, the two ideas have been linked based on intuition and common sense, but to our knowledge there have been no detailed literature reviews that have summarized what the research literature says about how affordable housing and TOD policies could or should be integrated. This paper helps bridge that gap.

The Impact of TOD Affordable Housing on Vehicle Miles Traveled

Two empirical relationships underpin the discussion of TOD, affordable housing, and VMT. First, low income persons drive less. Second, persons drive less when locating near TOD. Recently advocacy groups have put these two strands of the literature together to argue that locating affordable housing near TOD, by providing locations for low-income persons to live near rail transit, can meet two policy goals at once, reducing VMT while increasing California's supply of affordable housing (California Housing Partnership Corporation & Transform 2014; CTOD 2010a, CTOD 2010b). We first summarize the two strands of the literature, and then we note that the supposed seamless integration of VMT and affordable housing goals is not as tight as advocates had hoped. But first, let us summarize what the literature shows.

We have long known that higher income persons travel more. Santos, et al. (2011, Table 8, p. 18) use data from the Nationwide Personal Transportation and National Household Travel Surveys, from 1983 to 2009, to show that households that earn more than $80,000 per year consistently take twice or more the number of trips that households earning less than $10,000 per year (incomes in inflation adjusted 2001 dollars). Although more trip-making does not necessarily equate to more miles traveled, we would expect that the relationship between income and travel would be similar to the relationship between income and VMT. Data from the 2012 California Household Travel Survey, summarized in Table 1, confirm this.

The Los Angeles metropolitan area, embodied by the Southern California Association of Governments (SCAG) region[2], presents an excellent opportunity to analyze the intersection of affordable housing, sustainability, and TOD. The metropolitan area is rapidly growing its light rail transit system, going from: 0 stations before 1990, to 92 by 2017, to 110 anticipated by 2040.[3] Concurrently, the share of housing considered affordable in the region has been

[2] The Southern California Association of Governments region is Imperial, Los Angeles, Riverside, Orange, San Bernardino, and Ventura Counties.

[3] Per the Los Angeles Metro Transportation Authority's Projects page.

diminishing. The Los Angeles metropolitan area's median household expenditures on housing in 2013 was 30% of household income (Taylor 2015, Figure 11). This is 2%-5.5% higher than other California metropolitan areas and 7% higher than major metropolitan areas in other states (Taylor 2015, Figure 11). Similarly, other metropolitan areas that are expanding their light rail transit systems may increasingly encounter the same challenges with affordable housing as the Los Angeles metropolitan area.

Turning to VMT in the SCAG region, households earning more than $150,000 per year have almost twice the household VMT as households earning less than $35,000 per year. This result agrees with analyses by Newmark and Haas (2015, Table 3, p. 30), and Salon (2013, Table 11, p. 35), who show similar patterns of income and VMT analyzing, respectively, data from the CHTS for all of California and combined data from five travel surveys in California from 2000 through 2009.[4] The second stylized result that suggests a nexus between affordable housing and VMT is the relationship between travel behavior and living near rail transit. A large literature has studied driving and transit ridership near TOD. The results document consistently strong associations between living near rail transit and both driving less and using rail transit more. Tal, Handy, and Boarnet (2013) summarize the relationship between a household's distance from rail transit and VMT, and they conclude that the literature suggests the moving a mile closer to a rail station reduces daily household VMT by from 1.3 to 5.8 percent. Bailey, Mokhtarian, and Little (2008) conclude that at a distance of 2.25 miles or less from a rail transit station, moving households a mile closer to rail transit would be associated with a 5.8 percent reduction in household VMT.

Table 1 shows data for the SCAG region that compare the travel behavior of households that live within ½ mile of a Los Angeles rail transit station to the travel behavior of households living beyond a half-mile of a rail transit station. The table shows, in columns from left to right, daily average household vehicle miles traveled, daily household rail transit trips, and daily household bus transit trips, in each case showing the difference in those values for households living within and beyond ½ mile of a Los Angeles rail transit station, using the 2012 California Household Travel Survey. Table 1 shows those within-beyond half-mile differences by income, but for now focus on the total sample values summarized on the bottom row. Households living within a half-mile of a Los Angeles rail transit station drive, on average, 16 miles less per day, take 0.19 more daily rail transit trips, and 0.4 more bus transit trips than households living beyond a half-mile from a rail station. These cross-sectional relationships compare nicely to the results from the econometric literature (e.g. Bailey, Mokhtarian, and Little, 2008; Cervero, 2007), which uses more advanced techniques to conclude that households living near rail transit drive less, and use transit more. Yet is the association between TOD residence and less driving evidence of causality?

Transportation scholars have spent decades examining whether the evidence on the relationship between land use and travel behavior shows a causal impact of TOD residence on

[4] Salon (2013) combined travel survey data from the 2001 Caltrans statewide (California) travel survey, the 2009 California sample from the National Household Travel Survey, and metropolitan travel surveys from the San Francisco Bay Area (in 2000), the Los Angeles area (in 2000), and San Diego (in 2006).

travel. The counter argument is that persons who desire transit-oriented travel might move to TODs, and hence the effect would be residential selection rather than a causal effect of rail transit on household driving. A large literature has studied residential selection, and the issue is complicated both from an econometric and a policy perspective.[5] Two different parts of the literature have recently pointed to the same conclusion – that the link between TOD residence and a combination of less driving and more transit use is likely largely causal. Cao, Handy, and Mokhtarian (2009) summarized evidence on residential selection and travel behavior, and they concluded that the evidence suggests that land use (including, by extension, TODs) likely plays a direct role. Cao, Xu, and Fan (2010) found that driving behavior was largely affected by residential location, rather than residential self-selection. Zhou and Kockelman (2008), in an econometric study, conclude that at least half and possibly more of the association between land use and VMT is due to direct effects of the built environment, not residential selection. In the most advanced econometric study of this sort to date, Duranton and Turner (2016) found that residential selection accounts for about one-sixth (or in some specifications less) of the association between household VMT and land use, an effect that is consistent with the upper bound of Zhou and Kockelman's estimates of the direct effect of land use on VMT. Overall, a growing body of evidence suggests that residential selection plays only a small role in observed associations between land use and driving; the largest part of the association appears to be the direct effect of land use on reduced household VMT, rather than households with different travel preferences sorting into neighborhoods with different land uses.

Recent evidence from an experimental-control group study in Los Angeles reinforces these findings. Spears, Boarnet, and Houston (2016) studied travel behavior change among residents near Phase I of the Expo light rail line, which opened in stages in April and June of 2012. The researchers enrolled households in a seven-day travel study and categorized households as experimental households (those living within a kilometer of a new light rail station) and control households (those living from one to five kilometers of the new light rail stations.) Each group of households tracked their travel once before the new rail line opened (in Fall of 2011) and twice after opening (in Fall 2012 and Fall 2013). By studying travel changes for experimental and control group households before and after the line opened, this research design allows strong causal inference. This is particularly true given that approximately two-thirds of the study households had lived at their residence for at least five years before the first data collection (in 2011), suggesting that it is unlikely that near-rail households had been motivated to move to the study area to take advantage of the rail line. Spears et al. (2016) found that before the rail line opened the experimental and control households had no statistically significant differences in VMT or rail transit travel.

[5] Salon (2013) combined travel survey data from the 2001 Caltrans statewide (California) travel survey, the 2009 California sample from the National Household Travel Survey, and metropolitan travel surveys from the San Francisco Bay Area (in 2000), the Los Angeles area (in 2000), and San Diego (in 2006). Also Naess (2014a and 2014b).

Table 1. Household daily VMT, rail trips, and bus per income level in the SCAG region

Income bracket	Avg. daily VMT per household			Avg. daily rail trips per household			Avg. daily bus trips per household			No. of Obs.	
	Households within station area (1)	Households outside station area (2)	(1) - (2)	Households within station area (3)	Households outside station area (4)	(3) - (4)	Households within station area (5)	Households outside station area (6)	(5) - (6)	Households within station area	Households outside station area
$0 to $9,999	6.7	13.7	-7.0	0.25	0.07	0.18	1.30	0.80	0.50	69	591
$10,000 to $24,999	11.8	25.3	-13.5	0.22	0.06	0.16	1.10	0.70	0.40	138	1721
$25,000 to $34,999	22.2	28.1	-5.9	0.39	0.04	0.35	1.10	0.40	0.70	85	1130
$35,000 to $49,999	28.2	32.9	-4.7	0.18	0.04	0.14	0.60	0.20	0.40	87	1585
$50,000 to $74,999	30.3	40.9	-10.6	0.27	0.03	0.24	0.20	0.10	0.10	103	2456
$75,000 to $99,999	34.1	44.2	-10.1	0.09	0.02	0.07	0.20	0.10	0.10	64	2158
$100,000 to $149,999	31.4	54.2	-22.8	0.14	0.03	0.11	0.20	0.10	0.10	58	2484
$150,000 or more	50.2	55.6	-5.4	0.02	0.02	0.00	0.05	0.08	-0.02	47	2014
Total	**24.4**	**40.4**	**-16.0**	**0.22**	**0.03**	**0.19**	**0.60**	**0.20**	**0.40**	**651**	**14139**

Source: U.S. Department of Energy National Renewable Energy Laboratory (NREL) (2013) California Household Travel

NCST

Approximately 18 months after the rail line opened, the experimental households (those living within a kilometer of a new station) drove 9.75 miles less per day and took 0.21 more rail transit trips per day compared to control households.[6] This supports the conclusion from the econometric literature that living near rail transit reduces driving.

Based on this type of evidence, advocacy and consulting groups have put forth a literature focused on environmental sustainability, TOD-area affordable housing, and reducing displacement of low-income TOD residents. The California Housing Partnership Corporation and Transform have argued that housing policy should pursue low-cost rental and ownership opportunities near transit, facilitating the linked goals of driving reduction and affordable housing (California Housing Partnership Corporation & Transform 2014). The Center for Transit Oriented Development has recommended a set of criteria to classify station areas by potential development scenarios and relate this to VMT targets to achieve GHG emission reductions (CTOD, 2010a, CTOD, 2010b). Lastly, Reconnecting America (2007) has proposed development typologies for the San Francisco Bay Area to achieve GHG emission reduction goals.

Yet if the literature is clear that the relationship between driving and TOD residence is in largest part causal, the relationship between driving changes, TOD residence, and income is not as simple as affordable housing advocates might hope. Table 1 shows that the gap between the "within half-mile" and "beyond half-mile" household VMT values is largest in the income range between $100,000 and $149,999, and smaller for households in income ranges below $10,000 per year, from $25,000 to $34,999 per year, and from $35,000 to $49,999 per year. If we assume that those differences reflect driving changes that would occur if households of different income levels moved near transit, Table 1 implies that moving the relatively affluent $100,000 to $149,999 annual income households near rail stations will lead to the largest reduction in driving. Interpreted literally, Table 1 can be taken as evidence that high income housing near rail transit will reduce VMT more than affordable housing near rail transit. Of course, the unadjusted averages do not necessarily reflect what would happen if households moved from beyond to within a half-mile from a rail transit station, but other research using regression controls points to similar conclusions (see Boarnet et al., 2016.) The VMT data in Table 1 should give pause to persons who think that VMT reduction and affordable housing goals are seamlessly connected in TODs. Rather, we argue that the other columns in Table 1, and the state's acute affordable housing crisis, suggest a more nuanced but every bit as urgent argument for building affordable housing in TOD neighborhoods.

The columns for average household daily rail and bus transit trips in Table 1 show that the income relationship for bus and rail ridership and near-rail residence is stronger at the lower income levels. The gap in average household daily rail and bus transit trips, for households within and beyond a half-mile from a rail transit station, is largest for households earning less than $35,000 per year. If those patterns suggest the impacts of households moving to TOD (again, Table 1 is suggestive but not definitive in that regard), having lower income residents near rail stations may boost both rail and bus transit ridership, even if it appears that the higher

[6] Private vehicle greenhouse gas emissions also dropped among near-rail (experimental group) households. See Boarnet, Wang, and Houston (2016).

income households will reduce driving more when living near rail. This illuminates an important argument for providing affordable housing in TOD neighborhoods – such housing can help improve the performance of California's transit systems. Relatedly, the literature shows that changes in bus and rail trip-making do not typically result in one-for-one reductions in driving trips (see, e.g., Spears et al., 2016). Hence it is important for policy makers to understand that policies that may increase transit use, such as TOD affordable housing, while they will have an impact on transit ridership, will not result in reduction of driving that is one-for-one commensurate with increases in transit. The transit link is both vital for VMT reduction in TOD neighborhoods *and* more complex than a simply one-for-one displacement of driving for transit trips.

In addition to supporting transit, equity arguments provide a strong reason to build affordable housing near rail transit. Studies indicate that California has chronically underbuilt housing in the past three decades. Morrow (2013) notes the Los Angeles grew by 900,000 persons from 1970 to 2000, while the city's zoning code was consistent with an increase of only 390,000 persons during that time – in effect, Los Angeles added half a million more persons from 1970 to 2000 than the zoning code anticipated, or allowed. Morrow (2013) goes into detail about how the under-supply implied by land use controls is the result of political pressures that, at their base, reflect anti-growth sentiment. Other California metropolitan areas have similarly under-supplied housing. The McKinsey Global Institute found that, from 2009 to 2014, California added 544,000 households but built only 467,000 housing units (Woetzel et al., 2016). While building by itself is unlikely to return high cost metropolitan areas to housing affordability, the law of supply and demand suggests that building must be a part of the state's affordable housing policy. California metropolitan areas, due in part to statewide policies that include SB 375 (2008), are planning to accommodate a large fraction of the state's future housing needs near rail transit. The SCAG 2016 Regional Transportation Plan / Sustainable Communities Strategy envisions 46 percent of all the region's new housing during the next twenty-five years will be built within a half mile of fixed guideway rail transit or high frequency (15 minutes or less, peak hour) bus transit (SCAG, 2016, executive summary, p. 8). Building affordable housing near TOD must be an important part of the state's housing affordability program, if for no other reason than that building near rail will be a large amount of future California residential development. Additionally, TOD affordable housing can help support the operational efficiency of the state's massive investment in mass transit. In the next section, we discuss affordable housing programs generally, as an introduction to affordability policies that California metropolitan areas can pursue in TODs.

Will Affordable Housing in TODs Remain Affordable in the Long Run?

In this section, we consider the relationship between TOD and affordable housing over a longer time horizon. This is important because of the dynamic nature of urban economic and housing markets. Units that are affordable today could become unaffordable in the future for several reasons. Market forces associated with the introduction of new amenities could trigger increases in housing prices and rents, as the neighborhood becomes appealing to a broader, more affluent population. Further, the production and maintenance of affordable housing in

many markets is viable only if either supply- or demand-side subsidies are provided on an on-going basis. This is especially true in high cost coastal markets, but holds in many urban areas nationwide. The prospect that initially affordable TOD units may not remain affordable has important long-run implications for the successful pursuit of prevailing GHG and affordable housing goals.

Before diving into this issue more fully, it is useful to review housing affordability and the structure of the affordable housing sector so that the nature of these challenges and the potential solutions can be better illuminated. Regarding affordability, it is important to point out that the lack of affordable housing has become a more significant problem over the past 25 years. This is particularly true for renters. A recent analysis of changes in rental affordability between 2000 and 2010 found that affordability worsened for households at the 20th and 40th percentiles of the local income distribution in 236 of the 238 largest metropolitan statistical areas and worsened in every metropolitan area studied for households at the 60th and 80th percentiles of the local income distribution (Schwartz, et al., 2016). This dynamic was driven by a steady rise in rents coupled with a lack of income growth among renters. Collinson (2011) showed that these trends have been in effect since at least 1990, making it clear that the housing affordability challenge is a longer-term concern, which is why the longer-term perspective we take in this section is important.

The affordable housing stock includes both subsidized and unsubsidized units. Subsidized units are those in which the federal government provides a subsidy to either the builders, owners and operators of buildings (supply-side subsidies) or to tenants needing assistance (demand-side assistance) (Schwartz, et al. (2016). The bulk of these low-income housing subsidies – 90 percent – target renters as opposed to homeowners (Olsen, 2007). This stands in stark contrast to the distribution of federal housing subsidies more generally, where more than 70 percent target homeowners (Fischer and Sard, 2016).

Two federal housing subsidy programs, the Low-Income Housing Tax Credit (LIHTC) program and the Project-based Section 8 program, provide subsidies directly to owners of privately-owned buildings, who in turn agree to limit rents in return for the subsidy. The LIHTC program is a tax expenditure established through the tax code whereby for-profit companies receive a tax credit if they provide equity investments in projects to build or rehabilitate affordable housing (Eriksen and Rosenthal, 2010). Because of the credit, equity investors typically require lower (often zero) returns from the project on their investments, meaning that the program is providing a subsidy to the developer (and potentially owner-operator) of the housing. After defining minimum affordability and eligibility requirements, the program delegates selection criteria for projects to receive the credit to the states. In all states, developers using the LIHTC program agree to keep units rent-restricted for a minimum of 15 years, with some states requiring restrictions for over 50 years. The LIHTC program is now the primary vehicle through which rental housing (not just affordable housing) in the United States is created (Eriksen and Rosenthal, 2010). In California specifically, use restrictions on affordable units financed by the LIHTC program last for 55 years (CA Tax Credit Allocation Committee, 2017). This 55-year period applies to additional rental housing financed by other California housing programs, such as the

California Department of Housing & Community Development's (HCD) Multifamily Housing Programs (HCD, 2017).

In the Project-based Section 8 program, private owners of affordable housing are provided with subsidies to build or renovate units that will have rent restrictions. Rents are set based on prevailing rents in the market, though they cannot exceed 110 percent of the HUD-determined fair market rent (HUD, 2016). Landlords enter into contracts with local public housing contracts that specify how long the units will remain rent-restricted (currently 10 years, but it has been as long as 25 years).[7]

Tenants receive subsidies through the Public Housing and Housing Choice Voucher programs. Tenants are indirectly subsidized via the federal Public Housing program, in which the federal government, through local public housing authorities, directly manages housing units and keeps the rent burdens relatively low. Unlike the landlord subsidy programs, in which non-governmental organizations build the housing, public housing projects were built by the federal government.[8] Tenants in public housing projects pay 30 percent of their income for rent, with the local housing authority receiving federal funds to cover any costs exceeding this.
Finally, the Housing Choice Voucher (HCV) program, also known as the Section 8 voucher program, provides lower income households with a voucher that commits the federal government to provide funds to landlords to make up the difference between a maximum fair market rent and 30 percent of the household's income. The landlord in turn agrees to maintain the unit to a specified level of quality and the tenant agrees to abide by rules of tenancy established by the landlord.[9]

These four programs are the largest housing subsidy programs and account for about 5.5 million housing units (Collinson, Ellen and Ludwig, 2015, Schwartz, et al. 2016). In terms of composition, the number of subsidized units associated with the LIHTC and HCV programs has grown in the past 25 years, while the number of units covered by the Project-based Section 8 and public housing programs has remained steady (in the case of Project-based Section 8) or slightly declined (in the case of public housing) (see Figure 1) (Schwartz, et al. 2016).
Importantly, these units are sufficient to house only about 30 percent of the families who face acute housing affordability challenges, defined as paying more than 30 percent of their income for housing (Dreier and Bostic, 2016). The remainder of families must seek their housing through the unsubsidized stock, the units of which will be priced according to prevailing market conditions. This means that units can either be affordable or unaffordable, depending on housing demand and supply dynamics, the economics of building housing (which is discussed more fully in the next section), and household incomes. Housing units that are unsubsidized and affordable to households below the region's median income are often referred to as "naturally occurring affordable housing." A recent study estimated that there are 5.5 million units of naturally occurring affordable rental housing in urban areas (Pyati, 2016). Those households not able to secure either a subsidized unit or a naturally occurring affordable unit

[7] For more on the project-based voucher program, see HUD (2016).
[8] The federal government placed a moratorium on its building of affordable housing in 1973 (Schwartz, 2015).
[9] For more on the HCV program, see Schwartz (2015).

are left to fend in the remaining market of higher priced rental units. Choices for lower income people competing in this sector of the market include paying a larger (i.e., high) share of income for housing, living in crowded housing conditions, or perhaps homelessness.

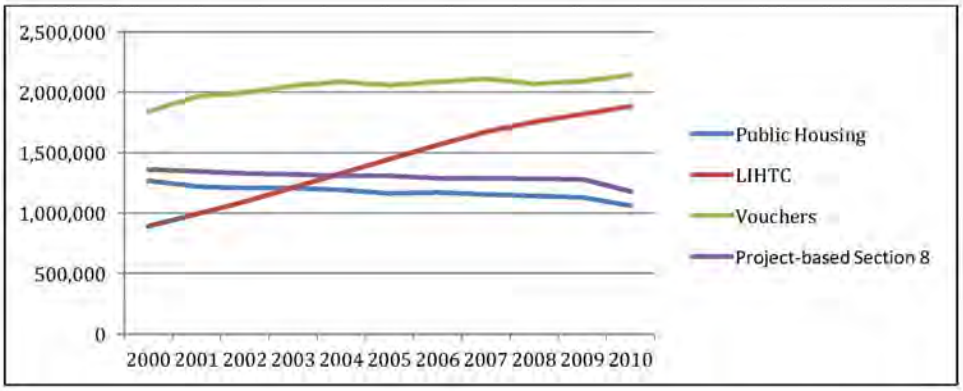


Figure 1. Units of federally subsidized housing, by program (2000-2010). Reproduced from Schwartz, et al. (2016).

With this background, we now turn to exploring what is known about local housing market dynamics upon the introduction of transit. A sizable literature has explored the relationship between housing prices and neighborhood amenities. For example, it is commonly recognized that house prices are positively associated with school quality (Jud and Watts, 1981; Ries and Somerville, 2010). Moreover, the evidence is clear that the introduction of a neighborhood amenity or elimination of a disamenity is associated with increases in housing prices. An example of the former is the introduction of new permanent parkland in a neighborhood, which has been found to increase the values of properties close to the new open space (Riddel, 2001). The remediation of brownfields – sites blighted with environmental contamination – is associated with significant increases in the values of properties proximate to the brownfield site, which is an example of the latter (Haninger, Ma and Timmons, 2012; De Sousa, Wu, and Westphal, 2009; Noonan, Krupka, and Baden, 2006).

Regarding light rail transit in particular, there is evidence suggesting that it is viewed as a neighborhood amenity in the same way. Atkinson-Palombo (2010) found that values in mixed-use walk-and-ride neighborhoods in Phoenix located near light rail transit are 6 and 20 percent higher for single-family homes and condominiums, respectively. Hess and Almeida (2007) likewise found a positive value relationship for housing in Buffalo located closer to transit stations. Looking at commercial properties, Cervero and Duncan (2002) similarly found a value premium, ranging from 23 to 120 percent, associated with proximity to transit stations. Bowes and Ihlandfeldt (2001) decomposed the overall effect to determine the contributions to value of reducing commuting costs, increasing access to retail establishments, negative station

NCST

10

externalities, and increased access for criminals to the neighborhood, and found all to be important, though their relative importance varies with distance to downtown and the neighborhood's median income.

Regarding the response of housing prices to the introduction of light rail, as with general amenities, the literature has found a positive relationship. Goetz, et al. (2010), for example, found positive impacts on values associated with the opening of the Hiawatha line in Minneapolis. The positive impacts were not uniformly experienced, with other land uses such as highways intervening to mitigate positive changes. Looking at three Canadian cases, Grube-Cavers and Patterson (2015) discovered positive relationships in two of the cases, consistent with the Goetz, et al. (2010) finding of some variation in effect across geographies. Immergluck (2009) found that property values increased *in anticipation* of the opening of the light rail transit associated with the Beltline redevelopment project in Atlanta, Georgia. This is consistent with many literatures that show that markets can move upon the announcement of a project or business action, before those projects and actions are consummated and completed.

The literature thus signals quite strongly that the introduction of rail transit is likely to be associated with upward pressure on house prices, meaning that there is some probability that units that are initially affordable will not be in the future. The implication of this varies with the type of housing. Unsubsidized units that were not in the affordable stock initially are very unlikely to become affordable in the future in this kind of market. Regarding naturally occurring affordable housing, one might expect these to become less affordable over time, perhaps even unaffordable, as landlords increase rents owing to their increased pricing power.

As discussed above, subsidized housing includes units that are permanently rent-restricted (via the public housing program) and that are rent-restricted for a contractually-established length of time (via the LIHTC, Project-based Section 8, and Housing Choice Voucher programs). Permanently restricted units are largely immune to these market forces, and will presumably remain affordable. However, landlords of units whose restrictions are time-limited have a choice when the restriction period ends – they can either choose to enter another contract that continues the restrictions or they can "opt out" and make their unit available to the broader market at prevailing market rents. What happens when landlords face this choice?

Though the literature on opting out is quite small, the answer that has emerged from the research is that landlords do choose to opt out, with opt out rates being significantly higher in "high opportunity" and "hot" neighborhoods. Ellen and Welescouch (2015) observed that opt out rates are larger in higher cost and higher amenity neighborhoods, for example. Reina and Begley (2014) found elevated opt out rates from a New York project-based subsidy program by landlords who own properties located in neighborhoods with high property value growth. Finally, while Lens and Reina (2016) found that opt outs from the project-based section 8 program were more common in lower-income neighborhoods, the effect was localized to improving lower-income neighborhoods. Thus this result also supports the view that the upward pricing pressure that transit will spark is likely to increase opt outs.

Reina (2016) shows that these opt outs are costly to tenants, who face the prospect of incurring moving costs and, if they are unable to find a new subsidized unit, higher ongoing housing

costs. Thus, the introduction of transit could potentially accelerate the housing affordability challenge, which works at cross purposes with one of the primary stated goals of integrating TOD and affordable housing. This body of evidence suggests that policies should be considered to ensure that any affordability gains achieved through the development of TOD are not lost as the market evolves. We review possible policy options in the closing section.

Benefits and Costs of Affordable Housing near Transit

The next issue the white paper focuses on is how to think of affordable housing near transit from a benefit-cost perspective. We first note that no formal benefit-cost analysis of locating affordable housing near transit has been conducted. This is a hole in the literature that deserves attention. Given this reality we cannot in this paper answer the question of whether the benefits of affordable housing near transit outweigh the frequently higher costs of development in TODs. Rather what we can do is outline both the benefits and costs of locating affordable housing near transit.

Much of the motivation for promoting affordable housing near transit has focused on three perceived benefits, all of which have been discussed previously. First, such housing would reduce the cost of living burden faced by lower-income households, who have to deal with covering high housing costs and getting to and from transit stations, which represent their primary mode of transportation more frequently than for higher income households. We have shown that affordable housing shortages are common in many markets and place significant burdens on households, particularly those with lower incomes. In addition, there is evidence demonstrating that the cost of getting to and from transit can place substantial burdens on households (see, for example, DeMaio, 2009). Second, an argument has been made that allowing heavy transit users to live closer to transit stops will increase ridership, thereby making operating transit more viable and profitable (see the data in Table 1).

Finally, it has been argued that locating affordable housing near transit reduces greenhouse gas emissions by causing residents to drive less, and we have presented evidence in Section 3 supporting this claim. Such evidence motivated the passage of legislation, such as California's law creating the Greenhouse Gas Reduction Fund and the Affordable Housing and Sustainable Communities program, that mandates that resources be devoted to providing such housing. Boarnet, et al. (2016) provides nuance to this finding. That analysis, and the data in Table 1, supports the view that locating affordable housing near transit does reduce driving, but further suggests that households with higher income may reduce driving even more than do lower income households when locating near rail transit (Boarnet, et al., 2016). Note, though, that Table 1 indicates a more unambiguous association between low income, residence near rail transit, and increases in transit ridership.

To consider the costs of locating affordable housing near transit, it is useful to view the housing from the perspective of developers. Unless affordable rental rates are close to the prevailing market rates, affordable units will be viewed as costly by developers because they generate less cash flow than could otherwise be achieved. If the affordable rates were not much lower than market rates, then it is possible that developers could produce affordable units and still exceed

their minimum required rates of return to remain a viable operation. However, this is often not the case, as affordable rents are often significantly lower than market rents.

In many markets, especially high cost markets, this is driven by the high price of acquiring land coupled with an inability to build at sufficient densities. A California Legislative Analyst report found that the cost of residential land in coastal California was nearly eight times the cost of residential land in the average U.S. metropolitan area (California Legislative Analyst's Office, 2015, p. 13). As noted in the report, the impact of this high cost on rents could be mitigated if buildings had significant densities that allowed the cost to be spread across many units. Unfortunately, such densities have not been realized in most California cities, causing the land cost to be applied to a smaller number of units, which in turn must carry high rents. Importantly for the current discussion, the high cost of land is an especially acute concern for TOD buildings, because evidence suggests that TOD land costs at least 23 percent more than non-TOD land (Cervero and Duncan 2002).[10]

Given these realities, the only way that providing affordable housing near transit is not costly is if other aspects of providing affordable housing reduce the cash flow gap between affordable and market rate development. In order to generate similar profit margins, then, affordable housing must offset the lower revenues from rent via: (1) lower development costs; (2) lower recurring/maintenance costs; and/or (3) rent subsides, including density bonuses, not available for market-rate housing. The remainder of this section explores whether these can be achieved in the development of affordable housing in TODs.

Outside of land, the largest cost for developing new and rehabilitating existing buildings is construction, which features the deployment of labor and materials, such as bricks, steel, and concrete, to erect a structure. Unfortunately, the costs of labor and materials are largely fixed. Developers cannot differentiate labor costs by housing type, and many building standards apply regardless of housing type as well. Furthermore, if a developer of affordable housing would like to receive rent subsidies, such subsidies carry federal mandates for the building and units. These include disability accommodations (established via the Americans with Disabilities Act), energy efficiency standards (*e.g.* ENERGY STAR), and public health standards (*e.g.* lead-free environments) (WHTT; Beavers, 2015). These stipulations, while potentially resulting in lower recurring and maintenance costs and providing a number of social benefits, increase the up-front development costs of such affordable housing. As any reductions in recurring and maintenance costs that occur in the future will be discounted (from an economic and accounting perspective), it is possible that increased up-front costs will outweigh the future savings. These facts taken together strongly suggest that affordable housing will in general not have significantly lower development costs than market-rate developments and that lower recurring and maintenance costs are unlikely to meaningfully offset this.[11]

---

[10] One strategy some developers have employed to reduce land costs is to develop in less desirable locations (see, for example, Welch (2013). However, this strategy adds transportation and other costs to residents that directly counteract the cost benefit of the affordable housing.

[11] It should be noted that rehabilitation of existing buildings is generally much more cost-effective than new construction (25 to 45 percent lower cost) for providing affordable housing (Wilkins, et al., 2015).

Current policies to produce affordable housing can widen these differentials. As one example, inclusionary zoning – a policy that requires developers to reserve a fixed percentage of all units to be affordable – has been documented to increase costs in several ways (Hickey, 2013). As another, the requirement to include parking structures for infill projects can add costs of $15,000 to $35,000 per space. Mandating taller buildings as opposed to wider ones forces developers to use steel and concrete frame construction as opposed to the less expensive wood construction and adds costs in terms of elevator and safety features. A National Association of Home Builders (NAHB) Research Center study and a more recent industry report found that the use of steel framing increased the cost of constructing a house by about 15 percent (NAHB Research Center, 2002; Kompareit.com, 2016).[12] Finally, to preserve affordability over the long run, some inclusionary zoning policies place caps on equity gains, which limits the resale potential of the property.

This leaves subsidies as the remaining option for reducing the cash flow disparity between market rate and affordable housing that makes the latter generally untenable from a profitability perspective. As discussed earlier, there are rental subsidies available for the production and support of affordable housing, but these have not been sufficient to fully satisfy the need for affordable housing in most markets. Thus, it is unlikely that subsidies will be sufficient to make affordable housing near transit a common reality without explicit governmental mandates that require developers to provide affordable units in their TOD projects.

To restate, this is a classic externality problem in that developers may not capture any direct monetary benefit from placing affordable housing in TODs. While there are potential social benefits from locating affordable housing near rail transit, there are likely no meaningful cost advantages for private affordable housing construction near transit. In the next section we discuss policies that can address that issue.

Affordable Housing Policy Approaches for Transit-Oriented Developments in California

This white paper has considered the implications of building affordable housing near transit in the context of environmental sustainability goals as well as housing affordability concerns by reviewing and summarizing the existing literature. Two findings emerge. First, the location of affordable housing near transit provides meaningful benefits, particularly for lower-income residents and transit operators, though there are costs to developers and environmental goals may not be achieved as fully as possible. Second, transit stations are likely to trigger market forces that place upward pressure on house prices and rents, meaning that housing

[12] These estimated cost differentials likely understate the true cost difference, as they are based on estimates of cost of building the identical house. The taller buildings arising from the application of inclusionary zoning policies will likely be larger in area than the buildings that would be developed in the absence of such policies due to the use of density bonuses, which are common in inclusionary programs, and other features (Hickey, 2013).

affordability is likely to be increasingly threatened for many families, especially those with lower incomes, who generally rely more upon transit.

In thinking about steps forward from a policy perspective, we suggest a three-pronged approach: (1) increase the supply of all units, with a strong focus in TOD areas, (2) increase subsidies for affordable units in TODs and near transit, (3) take steps to reduce the number of affordable units that opt out of subsidies. Together, these represent a comprehensive policy approach that will increase the positive impact of whatever affordable housing is produced near transit. They first recognize that California's housing markets are not currently producing enough housing, and any solution to the affordable housing problem must fix housing markets so that production more closely matches needs. Importantly, the approach embraces the fact that there are benefits to locating affordable housing near transit. Finally, it tries to reduce the pace that affordable housing units will be lost in the face of powerful and inevitable market forces.

Increase the Supply of Units, with a Strong Focus in TOD Areas

An important driver of California's housing crisis has been the fact that the production of housing units has not kept pace with the inflow of families to the state. The State Department of Housing and Community Development projects that population growth in the state requires 180,000 new homes annually, yet housing production has met that level in only 3 years since 2000 (California Department of Housing and Community Development, 2017: Figure 1.1). For the years 2008 to 2015, new annual production never exceeded 100,000 units, with production being less than 60,000 units annually each year from 2009 to 2012 (California Department of Housing and Community Development, 2017: Figure 1.1). This has created an ever-increasing shortage of housing units that, perhaps not surprisingly, has resulted in housing costs rising at a rapid pace.

A key element of this challenge is that land use decisions on development are local and cities and neighborhoods face a problem of the commons. Residents of each community are acutely sensitized to the costs of new development, especially where affordable housing is concerned, leading them to oppose such development using the argument that others in less burdensome situations can provide it. This argument is levied in virtually every community, with the result that each decides to produce fewer units, and a broad shortage results.

In California, such residents have many tools to block or substantially slow the pace of development. For example, they can drive changes in zoning codes that explicitly prevent significant new developments and any possible increases in building density (Levine, 2005). Moreover, zoning codes are changed relatively infrequently, meaning that once these provisions are established, they will prevail for many years. C.J. Gabbe (2016), in a recent UCLA Ph.D. dissertation, documented that from 2002 through 2014, Los Angeles changed the zoning on less than 0.2 percent (to reiterate, less than two-tenths of one percent) of the city's land each year. This appears to lag other cities, and may reflect the large barriers to residential building and density increases in California. New York, based on research cited in Gabbe (2016), changes the zoning on 20 percent of the city's land area from 2003 through 2009. Further, they

can use existing laws such as the California Environmental Quality Act (CEQA) to challenge projects on the grounds that they will have an adverse environmental impact. CEQA challenges can delay project for years, and often result in developers agreeing to downsize their projects or abandon them altogether (Hernadez, Friedman, and DeHerrera, 2015). Moreover, the cost of defending a CEQA challenge increases the cost of development, which reduces the likelihood that any units in such buildings will be priced affordably.

It has been long recognized that the solution to any problem of the commons is for a higher level of government to establish rules that prevent the negative outcome. In this case, we believe it is essential that the State take leadership in promoting the production of housing, with a particular focus on affordable housing. In the past year, state leadership has signaled some willingness to play this role. The legislature considered a "by right" bill proposed by Governor Brown that would have given developers an explicit right to build if the proposed building was in conformity with existing local zoning codes and reserved some units as affordable (Li, 2016). Unfortunately, the bill did not make it out of the Assembly (Li, 2016). We encourage state leadership to consider this and other measures that would have the effect of incentivizing the production of market rate and affordable housing. While we believe a "by right" type of legislation would be most effective – by right development exists in many other states – policymakers should not limit their efforts to pursuing only this policy direction. CEQA is ripe for review, and we suggest exploring policies that limit the ability to pursue CEQA challenges for certain types of development where environmental impact is effectively understood. Certain infill developments, where an existing building (often large and old) is replaced by a larger building that includes state-of-the-art environmentally friendly features, may represent one such category of developments. Strengthening the enforcement elements of the Regional Housing Needs Assessment process, by which affordable housing obligations are allocated to every jurisdiction in the state, is another possible item to explore.

One cannot discuss state leadership on a land use issue without acknowledging that this is an extremely sensitive political issue. The notion of local control of land use is widely recognized and treasured, and any encroachment on this is likely to be met with fierce resistance. However, the dire nature of the affordable housing crisis, and the fact that the crisis is steadily deepening, argues for bold measures by leading policymakers. A clear change in direction is needed.

At the local level, jurisdictions should consider how to interact inclusionary policies with baseline density allowances. As noted above, the Boarnet, et al. (2016) model estimates suggest that TODs developed with higher densities and lower inclusionary percentages have a larger positive impact in terms of both the availability of affordable housing and the reduction of VMT and GHG. A comparison of two possible scenarios considered in Boarnet et al. (2016) illustrates the importance of increasing density near rail transit stations. The authors modeled the effect of two density changes within a half mile of existing Los Angeles metro stations. Boarnet et al. (2016) found that increases in density by an average of 1.5 dwelling unit per acre (du/acre) in those half-mile areas, while requiring a very aggressive 60 percent of new development to be affordable, would reduce annual VMT by 104.8 million miles and produce 58,375 new affordable units. Modeling a more aggressive density increase, from today's

existing station-area (half-mile) average of 8.1 du/acre to an average of 14.9 du/acre (an 84 percent increase in average TOD area density), while requiring a considerable less ambitious 20 percent of new units to be affordable, would reduce annual VMT by 641.6 million miles and produce 273,222 new affordable units. In short, increasing Los Angeles' average station area density by 84 percent with moderate affordable housing requirements produces from five to six times as much impact on key policy variables than the less impactful "low density / high inclusionary" scenario.

That noted, if California cities increased density near TOD areas (which is consistent with leveraging the state's investment in rail transit), each jurisdiction will have to assess what combination of density and inclusionary requirements is palatable in their municipality given local political dynamics. We note that density increases near stations coupled with attention to affordable housing can make progress toward both affordable housing production and VMT reduction. We believe there is an imperative for local policymakers to use political capital to make progress on this front. We also encourage state policymakers to consider ways in which they might provide incentives for localities to implement policies that allow increases in both residential building and affordable housing construction, as the commons problem makes it less likely that such approaches will be pursued at scale without either state-provided incentives, state requirements, or a combination of both.

Increase Subsidies for Affordable Units in TODs and Near Transit

In trying to craft a solution to the affordable housing crisis, one must face the basic truth that is there an imbalance between the demand for affordable housing units and the supply of affordable units. We noted earlier that the approximately 6 million subsidized units account for about one-third of the total need among lower-income, which suggests that roughly 18 million lower-priced units would be required to fully satisfy the existing need. Given the recent estimate of 5.5 million naturally occurring affordable housing units, it is clear that there is a sizable shortfall – on the order of 7 million units – of this class of housing. The distribution of excess need is likely not 36 percent (6.5/18) in all markets. Rather, there is probably relatively little excess need in many markets in the middle of the country and much higher excess need in high cost markets, many of which are in California.

While some might look to the private market as the natural leader of an effort to fix the affordable housing problem, we are skeptical. While more building can slow price appreciation, it is unreasonable to expect that building could lower prices sufficiently to allow naturally occurring affordable housing to meet all need. The gap is simply too large. Given the very slow production experience in California over the past 15 years, we see no reason to expect an explosion in new development. Further, experience internationally suggests that housing in world cities has grown more expensive likely due in large part to increasing value of major cities as centers for production and commerce (The Economist, 2015). These realities mean that we will have to look to subsidies as an important part of the solution. We note that there is also a transit justification in support of deeper provision of subsidies. Given that lower income

residents use transit more (Table 1), there is a transit system functionality argument to provide subsidies to affordable housing in TODs.

The question, of course, is where to find the additional subsidy. First, it is important to note that recent policy decisions have moved California in the opposite direction. When Governor Brown eliminated the state's redevelopment agencies, he removed nearly $1 billion annually that was earmarked for the development and preservation of affordable housing. While clearly not sufficient to satisfy existing needs – a back of the envelope estimate suggests that a $1 billion annual expenditure in affordable housing (Blount, et al., 2014) would produce enough units to fill the current deficit in about 50 years – its loss means that the mountain to be climbed for success is just that much steeper.

Our back of the envelope estimate on how effective the redevelopment funds would be suggests that it is highly unlikely that a single source of subsidy will be sufficient. Rather, we will need as many subsidy sources as possible. There are several possibilities that policymakers should explore. First, given that there are already significant subsidies that are targeted toward housing, policymakers could adjust the allocation such that more was targeted towards rental markets than ownership markets. The mortgage interest deduction is a good candidate for implementing such a shift, as deductions are now available for second homes and high cost homes for which there is little policy justification for providing subsidies and whose owners likely do not need the subsidies. Capping the deduction to apply to homes costing no more than, say $500,000 (perhaps pro-rated to larger amounts for high cost markets) would free $10 to $15 billion that could be used for affordable housing (Lu, Rosenberg, and Toder, 2015). Regardless of federal action on this front, states could also choose to enact such a policy. California has taken a first step in this direction, with the Assembly introducing a bill that would eliminate the mortgage interest deduction on second homes and use the resulting $300 million that would be raised for affordable housing (Egelko, 2016).

State and local jurisdictions have the means to generate funds that can be used for subsidy on their own. Affordable housing trust funds have been created in some cities, including San Francisco (via a voter proposition) and Los Angeles (via City Council direction and using federal and city funds) (Office of the Mayor of San Francisco, 2012; Los Angeles Housing and Community Investment Department, n.d.). Jurisdictions can also choose to tax themselves to raise funds for affordable housing. Los Angeles County recently did this to raise funds to address the regional homelessness problem (Holland and Smith, 2016). Local policymakers should consider pursuing all of these strategies.

Land value capture policies represent another potential source of subsidy for affordable housing. Land value capture policies are defined as policies that "mobilize for the benefit of the community at large some or all of the land value increments...generated by actions other than the landowner's" (Smolka, 2013, p.2). There are many public investments that fit this model, such as the investment in light rail transit in Los Angeles, which past experience suggests will increase the values of properties located near stations (Goetz, et al., 2010; Grube-Cowers and Patterson, 2015; Immergluck, 2009). Smolka (2013) and Ingram and Hone (2012), among others, highlight many different possible approaches to implementing land value capture

policies at the local level. We encourage policymakers to review these and other resources that offer examples of how to put such policies in place.

Take Steps to Reduce the Number of Affordable Units that Opt Out of Subsidies

One concern about the affordability challenge that we highlighted in this review is that existing affordable units might be lost due to market dynamics. One important source of affordable housing that is at risk is the units that support the Section 8 programs, because landlords can choose to opt out of their contracts and place their units on the open market. Given this is a recognized issue, we encourage policymakers at the state and federal levels to take steps to try to reduce the opt-out rate from these programs.

Reduction of the opt-out rate from these programs will require making participation in the program more attractive. The program has long been criticized for being overly bureaucratic, such that landlords spend considerable resources to comply with regulations (Marr, 2010). For example, depending on how a building is funded, a landlord can be subjected to multiple physical inspections in a year, with varying standards defining being in compliance (Rental Policy Working Group, 2011). The Obama Administration established a working group to examine many such bureaucratic disincentives to program participation, and we encourage policymakers to review the issues raised by the working group and implement solutions as possible (Rental Policy Working Group, 2011).

Similarly, there is conventional wisdom that participants in the Section 8 programs impose more wear on units than other renters (see, for example, Royal Rose Properties, n.d.). While there is not clear evidence that this is true, the belief that it is could lead some landlords to decide to opt out or not participate in the first place. One way to address such concerns is to create a fund that landlords can draw upon if the cost to renovate a unit recently vacated by a Section 8 program participant exceeds some threshold amount. This would ensure that landlords incurred no additional operating costs from participating in the Section 8 programs. Finally, in addition to considering these recommendations, we encourage policymakers to consider lengthening the contract term for landlords. This would reduce the frequency with which the opt-out issue would have to be dealt with.

Conclusion

Building affordable housing in TODs is important for two reasons. California has an affordable housing crisis, due to decades when the state has built less housing than needed to accommodate population growth and an insufficient supply of subsidies for affordable housing. At the same time, persons who live in TODs drive less and use transit more. Providing TOD housing opportunities for low-income residents can increase transit ridership, thereby support state and local goals for rail and bus transit, and provide those low-income residents with lower-cost access to employment opportunities. Therefore, the colocation of affordable housing and light rail transit stations may introduce greater equity in employment access for lower income residents. While low-income residents in TODs will not reduce their driving as much as higher income residents, if both groups moved to the TOD from locations distant from transit, building TODs at higher densities can accommodate both low- and high-income

residents and make substantial progress toward both VMT reduction and affordable housing goals.

We suggest a three-pronged policy approach that focuses on: (1) Building more housing, both market-rate and affordable, particularly in TOD areas, (2) Increasing the subsidies for affordable housing, and (3) Reducing the rate that existing affordable units will opt out of affordability programs. There are several possible policy instruments for each overall goal. We encourage state officials to recognize that local governments are trapped in a "tragedy of the commons." At the municipal level, the possible downsides of increased density are typically most evident, leading each neighborhood to hope that needed housing is built somewhere else. When those tensions are repeated in each municipality, housing construction does not accommodate population growth, which is what has happened in California for the past few decades. State policies that either require or incentive local housing production, or both, will be necessary.

Having said that, increasing housing supply, by itself, will not solve the affordability problem. Evidence indicates that building near transit, if anything, will be more expensive that building elsewhere, and to accommodate the public interest in having affordable housing near transit California should explore ways to increase funding for affordable housing in TOD areas. Several options are possible, including land-value capture or state action that would open new funds for affordable housing subsidies. There are strong policy arguments for targeting such subsidies to TOD areas, while of course recognizing that there are needs in all parts of the state. Lastly, policy-makers should take action that reduces the incentives for property owners to opt out of affordable housing agreements when the affordability period expires – a point that requires particular and urgent attention as many TOD areas in California gentrify, making market-rate housing an attractive option for landlords.

The instinct that TODs are an opportunity to make progress on two fronts is correct. California has a housing affordability crisis and ambitious environmental goals, and policy changes can make development near rail transit an important part of the solution. Yet the policy landscape is complex, and will require coordination between state and local governments and policy innovation. With renewed focus on ways that housing and transportation policy intersect, and attention to the policy tools suggested here, TODs can be part of the way forward toward a more environmentally friendly and economically just future California. While the low-income residents in TODs will not reduce their driving as much as higher income residents, if both groups move to TODs from locations distant from transit, building TODs at higher densities can accommodate both low- and high-income residents and make substantial progress toward both VMT reduction and affordable housing goals. At the same time, a lack of affordable housing in TODs may result in the displacement of lower income residents to areas with lower levels of public transit access. This has implications for aggregate levels of VMT and transit access equity in the region. Future research should consider these additional consequences.

References

Atkinson-Palombo, Carol. "Comparing the capitalisation benefits of light-rail transit and overlay zoning for single-family houses and condos by neighbourhood type in metropolitan Phoenix, Arizona." Urban Studies (2010).

Bailey, L., Mokhtarian, P.L., and Little, A. 2008. The Broader Connection between Public Transportation, Energy Conservation and Greenhouse Gas Reduction. ICF International.

Bay Area Transit-Oriented Affordable Housing. (n.d.). Bay Area TOAH fund. Retrived on November 1, 2016 from http://bayareatod.com

Blount, Casey, Wendy Ip, Ikuo Nakano, and Elaine Ng (2014). Redevelopment Agencies in California: History, Benefits, Excesses, and Closure, Economic Market Analysis Division working paper EMAD-2014-01, Office of Policy Development and Research, U.S. Department of Housing and Urban Development, January.

Boarnet, Marlon G. Raphael W. Bostic, Seva Rodnyansky, Raul Santiago-Bartolomei. 2016. Environmentally Sustainable and Affordable Housing Near Transit in Los Angeles. Working paper, first presented at Association of Collegiate Schools of Planning conference, 2015.

Boarnet, Marlon G., D. Houston, G. Ferguson, and S. Spears, "Land Use and Vehicle Miles of Travel in the Climate Change Debate: Getting Smarter than Your Average Bear," in *Climate Change and Land Policies*, edited by Yu-Hung Hong and Gregory Ingram, Cambridge, Massachusetts: Lincoln Institute of Land Policy, May, 2011, ISBN 978-1-55844-217.

Boarnet, Marlon G., Xize Wang, and Douglas Houston, "Can New Light Rail Reduce Personal Vehicle Carbon Emissions? A Before-After, Experimental-Control Evaluation in Los Angeles," *Journal of Regional Science*, forthcoming, available online, early view, at http://onlinelibrary.wiley.com/journal/10.1111/(ISSN)1467-9787/earlyview, accessed Dec. 17, 2016.

Bowes, David R., and Keith R. Ihlanfeldt. "Identifying the impacts of rail transit stations on residential property values." Journal of Urban Economics 50.1 (2001): 1-25.

California Air Resources Board (ARB). (n.d.). Sustainable Communities. Retrieved on December 22, 2015 from http://www.arb.ca.gov/cc/sb375/sb375.htm

California Department of Housing and Community Development (n.d.). Affordable Housing and Sustainable Communities Program (AHSC). Retrieved on November 1, 2016 from http://www.hcd.ca.gov/financial-assistance/affordable-housing-and-sustainable-communities/

California Department of Housing and Community Development (n.d.). Multifamily Housing Program (MHP). Retrieved on March 27, 2017 from http://www.hcd.ca.gov/grants-funding/active-no-funding/mhp.shtml

California Department of Housing and Community Development (2017), California's Housing Future: Challenges and Opportunities – Public Draft, January, Sacramento, CA.

California Department of Transportation (Caltrans). (2013a). 2010–2012 California Household Travel Survey. National Renewable Energy Laboratory. Retrieved from www.nrel.gov/tsdc

California Department of Transportation (Caltrans). (2013b). 2010-2012 California Household Travel Survey Final Report. Retrieved from http://www.dot.ca.gov/hq/tsip/FinalReport.pdf

California Housing Partnership Corporation & Transform. (2014). Why creating and preserving affordable homes near transit is a highly effective climate protection strategy. Retrieved from: http://www.transformca.org/transform-report/why-creating-and-preserving-affordable-homes-near-transit-highly-effective-climate

California Legislative Analyst's Office (2015), California's high housing costs: Causes and consequencies, March, accessed at http://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf.

California Tax Credit Allocation Committee (n.d.). Low-Income Housing Tax Credit Programs. Retrieved on March 27, 2017 from http://www.treasurer.ca.gov/ctcac/tax.asp

Cao, X. J., Xu, Z., & Fan, Y. (2010). Exploring the connections among residential location, self-selection, and driving: Propensity score matching with multiple treatments. *Transportation research part A: policy and practice*, *44*(10), 797-805.

Carson, R. T., Jeon, Y., & McCubbin, D. R. (1997). The relationship between air pollution emissions and income: US data. *Environment and Development Economics*, *2*(4), 433-450.

Center for Transit Oriented Development (CTOD). (2010a). *Performance-based transit-oriented development typology guidebook*. Retrieved from http://www.reconnectingamerica.org/resource-center/books-and-reports/2010/performance-based-transit-oriented-development-typology-guidebook/

Center for Transit Oriented Development (CTOD). (2010b). *Transit oriented development and the potential for VMT-related greenhouse gas emissions growth reduction.* Retrieved from http://www.cnt.org/sites/default/files/publications/TOD-Potential-GHG-Emissions-Growth.FINAL_.pdf

Cervero, Robert. (2007). Transit oriented development's ridership bonus: A product of self-selection and public policies. *Environment and Planning Part A*, *39*(9), 2068–2085.

Cervero, R., & Duncan, M. (2002). Transit's value-added effects: light and commuter rail services and commercial land values. *Transportation Research Record: Journal of the Transportation Research Board*, (1805), 8-15. http://dx.doi.org/10.3141/1805-02

Cervero, R. & Murakami, J. (2010). Effects on built environments on vehicle miles traveled: evidence from 370 US urbanized areas. *Environment and Planning A*. 42, pp. 400-418.

Chester, M., & Horvath, A. (2010). Life-cycle assessment of high-speed rail: the case of California. *Environmental Research Letters*, *5*(1), 014003. doi:10.1088/1748-9326/5/1/014003

DeMaio, Paul. "Bike-sharing: History, impacts, models of provision, and future." *Journal of Public Transportation* 12.4 (2009): 3.

De Sousa, C. A., Wu, C., and Westphal, L. M. (2009). Assessing the Effect of Publicly Assisted Brownfield Redevelopment on Surrounding Property Values. *Economic Development Quarterly*, *23*(2), 95-110.

Dittmar, H., & Ohland, G. (Eds.). (2012). *The new transit town: best practices in transit-oriented development* (pp. 101-103). Island Press.

Dreier, P. and R. W. Bostic (forthcoming), "A New Way to House the Working Poor," in Anti-Poverty Policy Initiatives for the United States, S. Nichols and S. Danziger (Eds.), Russell Sage Foundation Press.

Duncan, M. (2011). The impact of transit-oriented development on housing prices in San Diego. *Urban Studies, 48*(1), 101-127.

Egelko, Bob (2016), "Mortgage interest deduction may end for 2nd homes," San Francisco Chronicle, December 20, accessed at http://www.sfgate.com/news/article/Ca-housing-plan-would-cost-second-home-10807208.php.

Ellen, Ingrid Gould, and Weselcouch, Max (2015). High-opportunity neighborhoods in NYC are losing affordable housing. New York: NYU Furman Center for Real Estate and Urban Policy. Retrieved from http://furmancenter.org/thestoop/entry/report-new-york-city-losing-affordable-housing-stock-in-high-opportunity-ne

Ericksen, Michael D. and Stuart S. Rosenthal (2010), "Crowd out effects of place-based subsidized rental housing: New evidence from the LIHTC program," Journal of Public Economics, 94: 953-966.

Ewing, R., Greenwald, M., Zhang, M., Walters, J., Feldman, M., Cervero, R., Frank, L., & Thomas, J. (2010). Traffic generated by mixed-use developments—Six-region study using consistent built environmental measures. *Journal of Urban Planning and Development*, *137*(3), 248-261.

Fischer, Will and Barbara Sard (2016), Federal housing spending is poorly matched to need: Tilt toward well-off homeowners leaves struggling renters without help, Chart Book Series, Center on Budget and Policy Priorities, Retrieved from http://www.cbpp.org/research/housing/chart-book-federal-housing-spending-is-poorly-matched-to-need.

Freeman, L., & Braconi, F. (2004). Gentrification and displacement New York City in the 1990s. *Journal of the American Planning Association*, *70*(1), 39-52.

Freedman, M., & McGavock, T. (2015). Low - Income Housing Development, Poverty Concentration, and Neighborhood Inequality. *Journal of Policy Analysis and Management*, *34*(4), 805-834.

Gabbe, C.J. 2016. Where Residential Density is Allowed – and Isn't – in Los Angeles: A Fresh Look at Zoning Changes. *UCLA Economic Letter*, August, available at http://www.anderson.ucla.edu/Documents/areas/ctr/ziman/UCLA_Economic_Letter_Gabbe_08.19.16.pdf.

Goetz, Edward G., Kate Ko, Aaron Hagar, Hoang Ton, and Jeff Matson. 2010. "The Hiawatha Line: impacts on land use and residential housing value." University of Minnesota Center for Transportation Studies report.

Grube-Cavers, Annelise, and Zachary Patterson. "Urban rapid rail transit and gentrification in Canadian urban centres: A survival analysis approach." Urban Studies 52.1 (2015): 178-194.

Haninger, K., Ma, L., & Timmins, C. (2012). *Estimating the Impacts of Brownfield Remediation on Housing Property Values*. Nicholas Institute Working Paper (Duke University) (EE 12-08).

Hankey, S., & Marshall, J. D. (2010). Impacts of urban form on future US passenger-vehicle greenhouse gas emissions. *Energy Policy*, *38*(9), 4880-4887.

Hensher, D. A. (2008). Climate change, enhanced greenhouse gas emissions and passenger transport–What can we do to make a difference?. *Transportation Research Part D: Transport and Environment*, *13*(2), 95-111.

Hernandez, Jennifer, David Friedman, and Stephanie DeHerrera (2015). *In the Name of the Environment*. Holland & Knight report.

Hess, Daniel Baldwin, and Tangerine Maria Almeida. "Impact of proximity to light rail rapid transit on station-area property values in Buffalo, New York." Urban studies 44.5-6 (2007): 1041-1068.

Hickey, R. (2013). *After the downturn: New challenges and opportunities for inclusionary housing.* Center for Housing Policy. Retrieved from http://www.nhc.org/after-the-downturn.

Holland, Gale and Doug Smith (2016), "L.A. votes to spend $1.2 billion to house the homeless> Now comes the hard part," Los Angeles Times, November 9, Retrieved from http://www.latimes.com/local/lanow/la-me-ln-homeless-20161108-story.html.

HUD (2016), Project Based Vouchers, accessed at https://portal.hud.gov/HUD?src=/program_offcies/public_indian_housing/programs/hcv/project.

HUD (2016), Project Based Vouchers - Frequently Asked Questions, accessed at https://www.hud.gov/offices/pih/programs/hcv/pubs/pbvfaq.pdf.

Immergluck, Dan. "Large redevelopment initiatives, housing values and gentrification: the case of the Atlanta Beltline." Urban Studies 46.8 (2009): 1723-1745.

Ingram, Gregory K. and Yu-Hung Hong, Value capture and land policies: Proceedings of the 2011 Land Policy Conference, Lincoln Institute of Land Policy, Cambridge, MA.

Kats, G. (2003). *Green building costs and financial benefits*. Boston, MA: Massachusetts Technology Collaborative.

Kimball, M., Chester, M., Gino, C., & Reyna, J. (2013). Assessing the potential for reducing life-cycle environmental impacts through transit-oriented development infill along existing light rail in Phoenix. *Journal of Planning Education and Research*, *33*(4), 395-410.

Kompareit.com (2016). Compare steel vs wood house framing costs, accessed at http://www.kompareit.com/homeandgarden/construction-compare-steel-vs-wood-house-framing.html.

Lens, Michael C., and Vincent Reina. "Preserving Neighborhood Opportunity: Where Federal Housing Subsidies Expire." Housing Policy Debate 26.4-5 (2016): 714-732.

Levine, Jonathan (2005). Zoned Out: Regulation, Markets, and Choices in Transportation and Metropolitan Land Use, Resources for the Future: Washington, DC.

Li, Roland (2016). "How construction unions helped kill Gov. Brown's plan to fight the housing crisis," San Francisco Business Times, August 23, accessed at http://www.bizjournals.com/sanfrancisco/blog/real-estate/2016/08/unions-against-gov-browns-as-of-right-housing-plan.html.

Los Angeles County and Metropolitan Transportation Authority (L.A. Metro). (2012). *Metro Countywide Sustainability Planning Policy & Implementation Plan.* Retrieved from http://media.metro.net/projects_studies/sustainability/images/countywide_sustainability_planning_policy.pdf

Los Angeles County and Metropolitan Transportation Authority (L.A. Metro). (n.d). *"Projects".* Retrieved from https://www.metro.net/projects

Los Angeles Housing and Community Investment Department (n.d.). Affordable Housing Trust Fund Pipeline, accessed at http://hcidla.lacity.org/Affordable-Housing-Trust-Fund-pipeline.

Los Angeles Office of the Mayor. (2015). *pLAn: Transforming Los Angeles*. Retrieved from https://www.lamayor.org/sites/g/files/wph446/f/landing_pages/files/The%20pLAn.pdf

Lu, Chenxi, Joseph Rosenberg, and Eric Toder. (2015). Options to reform the deduction for home mortgage interest. Tax Policy Center report, Urban Institute & Brookings Institution, December 8.

Marr, Matthew D. "Mitigating apprehension about Section 8 vouchers: The positive role of housing specialists in search and placement." *Housing Policy Debate* 16.1 (2005): 85-111.

Mukhija, V., Regus, L., Slovin, S., & Das, A. (2010). Can inclusionary zoning be an effective and efficient housing policy? Evidence from Los Angeles and Orange Counties. *Journal of Urban Affairs, 32*(2), 229-252. http://dx.doi.org/10.1111/j.1467-9906.2010.00495.x

Naess, Petter. 2014a. Tempest in a Teapot: The Exaggerated Problem of Transport-Related Residential Self-Selection as a Source of Error in Empirical Studies. *Journal of Transport and Land Use*, 2014, vol. 7, no. 3. Available at https://www.jtlu.org/index.php/jtlu/article/view/491, accessed Dec. 17, 2016.

Naess, Petter. 2014b. Reaction to Van Wee and Boarnet. *Journal of Transport and Land Use*, 2014, vol. 7, no. 3. Available at https://www.jtlu.org/index.php/jtlu/article/view/491, accessed Dec. 17, 2016. https://www.jtlu.org/index.php/jtlu/article/view/724, accessed Dec. 17, 2016.

NAHB Research Center (2002). Steel vs. Wood cost comparison: Beaufort demonstration homes. Report prepared for the U.S. Department of Housing and Urban Development, the North American Steel Framing Alliance, and the National Association of Home Builders, Washington DC.

Newsham, G. R., Mancini, S., & Birt, B. J. (2009). Do LEED-certified buildings save energy? Yes, but.... *Energy and Buildings*, *41*(8), 897-905. http://dx.doi.org.libproxy2.usc.edu/10.1016/j.enbuild.2009.03.014

Noonan, D.S., Krupka, D.J., & Baden, B.M. (2007). Neighborhood Dynamics and Price Effects of Superfund Site Clean-Up*.*Journal of Regional Science*, *47*(4), 665-692.

Office of the Mayor of San Francisco (2012), Mayor Lee announces San Francisco Housing Trust Fund to boost production of middle & low income housing, press release, May 22, accessed at http://sfmayor.org/mayor-lee-announces-san-francisco-housing-trust-fund-boost-production-middle-low-income-housing.

Olsen, Edgar O. (2007), Promoting homeownership among low-income households, Opportunity and Ownership Report Series, Urban Institute, Retrieved from http://www.urban.org/sites/default/files/alfresco/publication-pdfs/411523-Promoting-Homeownership-among-Low-Income-Households.PDF.

Pollack, S., Bluestone, B., and Billingham, C. (2010). *Maintaining diversity in America's transit-rich neighborhoods: Tools for equitable neighborhood change*. Dukakis Center for Urban and Regional Policy. Retrieved from http://nuweb9.neu.edu/dukakiscenter/wp-content/uploads/TRN_Equity_final.pdf

Pyati, Archana. 2016. "New CoStar Data Identifies 5.5 Million Units of Naturally Occurring Affordable Housing in Markets Across the United States," Urban Land Institute press release, October 18, accessed at http://uli.org/general-posts/new-costar-data-identifies-5-5-million-units-naturally-occurring-affordable-housing-markets-across-united-states/.

Ratner, K. A., & Goetz, A. R. (2013). The reshaping of land use and urban form in Denver through transit-oriented development. *Cities*, *30*, 31-46.

Reconnecting America. (2007, October 17). *Station Area Planning Manual*. Retrieved from http://ctod.org/pdfs/2007MTCStationAreaPlanningManual.pdf

Reconnecting America (n.d.), "What is TOD," accessed at http://reconnectingamerica.org/what-we-do/what-is-tod/.

Reina, Vincent, and Jaclene Begley. "Will they stay or will they go: Predicting subsidized housing opt-outs." Journal of Housing Economics 23 (2014): 1-16.

Rental Policy Working Group (2011). Federal Rental Alignment: Administrative Proposals, White House Domestic Policy Council, National Economic Council, Office of Management and Budget, U.S. Department of Housing and Urban Development, U.S. Department of Agriculture, and U.S. Department of the Treasury, December 31, accessed at https://www.huduser.gov/portal/aff_rental_hsg/rpwg_conceptual_proposals_fall_2011.pdf.

Riddel, Mary. "A dynamic approach to estimating hedonic prices for environmental goods: an application to open space purchase." Land Economics 77.4 (2001): 494-512.

Ries, John, and Tsur Somerville. "School quality and residential property values: evidence from Vancouver rezoning." The Review of Economics and Statistics 92.4 (2010): 928-944.

Royal Rose Properties (n.d.), The pros and cons of going Section 8, E-newsletter post, accessed at http://www.royalroseproperties.com/property-owner-blog/the-pros-and-cons-of-going-section-8/.

Santos, Adela, Nancy McGuckin, Hikari Yukiko Nakamoto, Danielle Gray, and Susan Liss. 2011. Summary of Travel Trends: 2009 National Household Travel Survey. Washington, D.C. U.S. Department of Transportation. Available at http://nhts.ornl.gov/2009/pub/stt.pdf, accessed Dec. 17, 2016.

Schwartz, Alex F. (2015), Housing Policy in the United States, New York: Routledge.

Schwartz, Heather L., Raphael W. Bostic, Richard K. Green, Vincent J. Reina, Lois M. Davis, and Catherine H. Augustine (2016), Preservation of Affordable Rental Housing, RAND Corporation report to the MacArthur Foundation.

Smolka, Martim O. (2013), Implementing value capture in Latin America: Policies and tools for urban development, Policy Focus Report, Lincoln Institute of Land Policy, Cambridge, MA.

Southern California Association of Governments (SCAG). 2016. Final 2016 Regional Transportation Plan / Sustainable Communities Strategy. Los Angeles, CA: Southern California Association of Governments. Available at http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx#toc, accessed Dec. 17, 2016.

Southern California Association of Governments (SCAG). (2012). *2012-2035 Regional transportation plan/sustainable communities strategy*. Retrieved from http://rtpscs.scag.ca.gov/Pages/default.aspx

Spears, Steven. Marlon G. Boarnet, and Douglas Houston. 2016. Driving reduction after the introduction of light rail transit: Evidence from an experimental control group evaluation of the Los Angeles Expo Line. *Urban Studies*, forthcoming, available online-first at http://journals.sagepub.com/doi/full/10.1177/0042098016657261, accessed Dec. 16, 2017.

Tal, Gil, Susan Handy, and Marlon G. Boarnet. 2013. Policy Brief on the Impacts of Transit Access (Distance to Transit) Based on a Review of the Empirical Literature. Sacramento, CA: California Air Resources Board. Available at https://www.arb.ca.gov/cc/sb375/policies/transitaccess/transit_access_brief120313.pdf, accessed Dec. 17, 2016.

Talen, E. (2013). Prospects for walkable, mixed-income neighborhoods: insights from US developers. *Journal of Housing and the Built Environment*, *28*(1), 79-94. doi:10.1007/s10901-012-9290-9

The Economist. 2015. The Paradox of Soil. April 4. Retrieved from http://www.economist.com/news/briefing/21647622-land-centre-pre-industrial-economy-has-returned-constraint-growth.

Taylor, M. (2015). "California's High Housing Costs. Causes and Consequences". California Legislative Analyst's Office (LAO). Retrieved from http://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf

U.S. Department of Housing and Urban Development (HUD). (n.d.a). Resources: Glossary, A. Retrieved from https://www.huduser.gov/portal/glossary/glossary_a.html

U.S. Department of Housing and Urban Development (HUD). (n.d.b). Affordable housing. Retrieved from http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/

Van Wee, Bert and Marlon G. Boarnet, "Reaction to the paper 'Tempest in a Teapot: The Exaggerated Problem of Transport-Related Residential Self-Selection as a Source of Error in Empirical Studies," *Journal of Transport and Land Use*, 2014, vol. 7, no. 3. Available at https://www.jtlu.org/index.php/jtlu/article/view/713, accessed Dec. 17, 2016.

Welch, T. F. (2013). Equity in transport: The distribution of transit access and connectivity among affordable housing units. *Transport Policy*, *30*, 283-293.

Wilkins, C., Brennan, M., Deora, A., Heegaard, A., Lee, A., & Lubell, J. (2015). Comparing the Life-Cycle Costs of New Construction and Acquisition-Rehab of Affordable Multifamily Rental Housing. *Housing Policy Debate*, *25*(4), 684-714.

Woetzel, Jonathan, Jan Mischke, Shannon Peloquin, Daniel Weisfield. 2016. A Tool Kit to Close California's Housing Gap: 3.5 Million Homes by 2025. McKinsey & Company. Available at file:///C:/Users/boarnet/Downloads/Closing-Californias-housing-gap-Full-report.pdf, accessed Dec. 17, 2016.

Zhou, Bin and Kara M. Kockelman. 2008. Self-Selection in Home Choice: Use of Treatment Effects in Evaluating the Relationship Between the Built Environment and Travel Behavior. *Transportation Research Record No. 2077*: 54–61, 2008.

NCST

Shima Hamidi, Reid Ewing & John Renne (2016) How Affordable Is HUD Affordable Housing?, Housing Policy Debate, 26:3, 437-455, DOI: 10.1080/10511482.2015.1123753

Abstract

This article assesses the affordability of U.S. Department of Housing and Urban Development (HUD) rental assistance properties from the perspective of transportation costs. HUD housing is, by definition, affordable from the standpoint of housing costs due to limits on the amounts renters are required to pay. However, there are no such limitations on transportation costs, and common sense suggests that renters in remote locations may be forced to pay more than 15% of income, a nominal affordability standard, for transportation costs. Using household travel models estimated with data from 15 diverse regions around the United States, we estimated and summed automobile capital costs, automobile operating costs, and transit fare costs for households at 8,857 HUD rental assistance properties. The mean percentage of income expended on transportation is 15% for households at the high end of the eligible income scale. However, in highly sprawling metropolitan areas, and in suburban areas of more compact metropolitan areas, much higher percentages of households exceed the 15% ceiling. This suggests that locational characteristics of properties should be considered for renewal when HUD contracts expire for these properties, based on location and hence on transportation affordability.

Challenges and Policy Options for Creating and Preserving Affordable Housing ...

By Rick Haughey, Ryan Sherriff

Key Point: Encourages the development or preservation of affordable and workforce housing in location-efficient areas...[that] are near transit, employment centers, or other essential services that allow families to reduce the number and extent of necessary car trips.

I. Introduction

The purpose of this report is to examine specific, actionable changes that the U.S. Department of Housing and Urban Development could make to better facilitate and encourage the development or preservation of affordable and workforce housing in location-efficient areas. These are areas near transit, employment centers, or other essential services that allow families to reduce the number and extent of necessary car trips. Where possible, these changes are limited to regulatory and administrative changes that do not require legislative approval. Due the complexity of this type of development and the importance of coordinating policy across silos and levels of government, the report also includes a number of recommendations for other federal agencies as well as state, regional and local agencies.

Transit as defined in this report encompasses reliable bus, bus rapid transit, street car, or light and heavy rail commuter service and subway. Transit-oriented development (TOD) refers to new residential, commercial, and mixed-use development and the preservation, renovation, and rehabilitation of existing real estate within walking distance of these modes of transportation. It is a general assumption of this report that transit-oriented development refers to development at or around transit stops that is more concentrated (i.e., at a higher density) than in the surrounding areas. "Higher density" is a relative term and obviously means something different in New York City than it does in Boise, Idaho. Clustered small single family homes on small lots and townhomes could be significantly higher density than the "surrounding areas" in many parts of the country. In this report however, TOD does not refer to low-density development that happens to have transit located near-by.

Key Point: Transit Oriented Development (walking scoring of 70 or 8 units per acre) are more expensive places to buy and rent housing……the paper argues that policies to increase the density and walkability of hybrid and TAD stations….should be a top priority for both housing and transportation officials.



Articles

The Cost and Affordability Paradox of Transit-Oriented Development: A Comparison of Housing and Transportati Costs Across Transit-Oriented Development, Hybrid and Transit-Adjacent Development Station Typologies

John L. Renne, Tara Tolford, Shima Hamidi & Reid Ewing

Pages 819-834 | Received 11 Aug 2015, Accepted 19 May 2016, Published online: 05 Jul 2016

Cite this article https://doi.org/10.1080/10511482.2016.1193038 Check for updates

Full Article Figures & data References Citations Metrics Reprints & Permissions Read this article

Abstract

This study presents a comparison of housing and transportation costs (H+T) in 4,399 fixed-route transit station areas across the United States. Each station area is classified as a transit-oriented development (TOD), hybrid, or transit-adjacent development (TAD) based on walkability and housing density targets. Station areas with a Walk Score of 70 or greater and a gross housing density of 8 units per acre or more are classified as TOD. Station areas that meet just one of these criteria are classified as hybrids, and those that do not meet either of these criteria are categorized as TAD. The findings reveal a paradox that whereas TOD are more expensive places to buy and rent housing, they are more affordable than hybrids and TAD because the lower cost of transportation offsets housing costs. We argue that policies to increase the density and walkability of hybrid and TAD station areas, which account for two thirds of all station areas across the United States, should be a top priority for both housing and transportation officials.

LETTER 65: Jennifer Brooks

Response to Comment 65-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 65-2
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, the Draft EIR does not make any assertion or suggestion that pedestrian and bicycle paths in Granite Bay are for commuting.

Response to Comment 65-3
The Draft EIR analyzed the project's potential impacts to vehicle safety in Impact 8-3 and concluded a less-than-significant impact. Please see also Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 65-4
Please see Master Response 4 – Traffic Safety.

Response to Comment 65-5
Please see Response to Comment 52-2.

Response to Comment 65-6
The Draft EIR discusses Local Responsibility Areas, including sites in Granite Bay, in Chapter 10, Fire Protection and Wildfire.

Response to Comment 65-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 65-8
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 65-9
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 66

From: Douglas Brosnan
To: Placer County Environmental Coordination Services; Planning Commission
Subject: Project 26, 8989 Auburn Folsom Rd.
Date: Friday, March 8, 2024 12:39:42 PM

Dear Planning Commission:

66-1 Please obtain an Environmental Impact Report prior to any development at 8989 Auburn Folsom Road. As is, over the past 16 years that I've lived in Lakeridge, I've noticed that the traffic along Auburn-Folsom has become Los Angeles-style congested, epsecially around morning and evening rush hours. The noise is already ridiculous and I am now hearing rushing vehicles and trucks along Auburn Folsom Road from my home even though I live about a half-mile away. Our community is based a a rural, suburban-rural environment and high-density development here does not make sense; especially as the civic resources and conveniences are located towards the Roseville area.

Please do not develop this parcel, I believe a much better use would be to allow the school to bank this property for potential future expansion of the school (Cavitt Jr High) as our community continues to grow or as open space.

Thank you for your consideration,

Sincerely,

Douglas P. Brosnan

LETTER 66: DOUGLAS BROSNAN

Response to Comment 66-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 67

From: George Brown
To: Placer County Environmental Coordination Services; Supervisor Gore
Date: Saturday, March 16, 2024 12:37:42 PM

Honorable Supervisors,

Bill Santucci appointed me the West Placer MAC in 1995 and I was on the board for 12 years. I was part of the board that approved Morgan Creek, Morgan Greens. I worked for years on Placer Vineyards, Riolo Greens and several other subdivisions in the Dry Creek Community. We are not anti growth, rather we are pro, compatible use growth. Compatible use is the backbone of planning, it's what keeps communities organized, with the best traffic outcomes we can achieve while putting uses compatible to growth in places where they make sense.

I know Riolo Greens and Placer Vineyards came through the MAC with the allotted affordable housing units as prescribed by the State to achieve our goals. Somewhere in the editing process that goes on after every subdivision and Specific Plan is approved and the developers take their wants to the planning department to amend the plans just recently approved, these affordable housing elements were removed. Now in order to fulfil those requirements the County has panicked and taken a shotgun approach without any consideration given to compatible use, or even following the basic parameters of smart planning.

67-1

To be forced to actively pursue 30 units per acre in rural neighborhoods is quite frankly a failure in planning on the part of the County. It showcases the lack of adherence to approved plans that large devements get away with. Which is an abject failure. Further to even consider putting this zoning across the street from an elementary school, on an already impacted road, is beyond bad planning, it is a road map to massive troubles that no one will be able to extricate themselves from. Think of the potential lawsuits the County will face when the inevitable injury or death occurs as a result of putting apartments directly across the street from an elementary school. The logic behind any of the rezones in large parcel rural areas is ludacris from the start.

The County needs to find better more suitable areas for these units that were already zoned into Placer Vineyards and Riolo Greens and not allow these developments to shirk their State required affordable housing element.

Sincerely
--
-George Brown

LETTER 67: GEORGE BROWN

Response to Comment 67-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Letter 68

From: Chris Brown
To: Placer County Environmental Coordination Services
Subject: Housing Needs Rezone Program
Date: Tuesday, March 5, 2024 3:13:39 PM

Hello,

68-1 I like many residents within Placer County (specifically Granite Bay) summarily request halting of placing any large scale multi family affordable housing in the area within Granite Bay (including and especially site 23). I am perplexed as to why this property amongst open space and majestic oaks, nearby creeks and trails would be selected. This project has no place in this area and will undermine the property values, open space enjoyment and site lines of everyone around it. Not to mention, our concerns over possible rises in crime and noise.

I humbly request this site be removed from consideration. This will prompt I, and many others to move out of the area (and take our tax dollars with us).

Thank you for your time and consideration.

Chris Brown
(concerned citizen of Granite Bay)

LETTER 68: CHRIS BROWN

Response to Comment 68-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 69

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:28:53 AM

From: Dee Browning <deebrowning61@gmail.com>
Sent: Friday, March 8, 2024 4:51 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

69-1 I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

69-2 1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

69-3 2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

69-4 3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

69-5 4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

69-6 For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately

-Dee Browning

LETTER 69: DEE BROWNING

Response to Comment 69-1

Please see Responses to Comment Letter 62.

Letter 70

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Project 8 in District 1
Date: Tuesday, February 20, 2024 9:35:47 AM

From: Dee Browning <deebrowning61@gmail.com>
Sent: Friday, February 16, 2024 9:23 AM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Project 8 in District 1

Supervisor Gore,

I am writing to you to beg you to oppose the rezone at 8101 East Drive in Roseville (project #8 in District 1). I was raised a short distance from where the proposed rezone property is located and my parents continue to live in the house I grew up in. I care deeply for this community which is why I have remained in District 1 and have since raised two daughters and now grandchildren here. I would hate to see what the development of this property into multi-unit housing would do to the community.

70-1

Additionally, this property has been identified as "under-utilized". However, for years it has served as an option for the community to obtain fresh, local produce. The people who work this produce stand are hard working individuals who do not deserve to have their livelihood ripped away from them. How can this be seen as under-utilized?

I implore you to take our concerns into consideration and oppose the rezone of project #8 on our behalf.

Dee Browning
1335 Providence Way

LETTER 70: DEE BROWNING

Response to Comment 70-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 71

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:27:58 AM

From: Shannon Browning <s.browning91@yahoo.com>
Sent: Friday, March 8, 2024 4:44 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

71-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Thank you,
Shannon Browning

1633 Alnwick Dr

LETTER 71: SHANNON BROWNING

Response to Comment 71-1

Please see Responses to Comment Letter 62.

Letter 72

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Project #8 8101 East Drive - District 1
Date: Tuesday, February 20, 2024 9:35:34 AM

From: Shannon Browning <s.browning91@yahoo.com>
Sent: Thursday, February 15, 2024 6:56 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Opposition to Project #8 8101 East Drive - District 1

Hello Supervisor Gore,

I wanted to reach out to express my firm opposition to rezoning project #8 at 8101 East Drive. When I was notified of the intent to rezone the property on East Drive by a concerned friend several days ago, I was exceptionally distraught. I have spent my whole life in District 1 and can't imagine enacting a rezone that would significantly impact the area.

I fear that rezoning that property for multiple dwellings would cause an influx of people that will bring with it traffic and overcrowding.

72-1

On a more personal note, my grandparents built their home on 2 acres less than half a mile from the proposed rezone site nearly 60 years ago and their peaceful home and community have always been a constant in my family's daily lives. My niece and nephew are the fourth generation of lifelong Roseville residents and I can't imagine rezoning a part of my grandparents' calm, rural community to accommodate crammed housing or apartment buildings. Not only will it cause a large influx of people and traffic, but it would forever change the atmosphere of a precious Roseville community.

As a representative of myself and my family who reside in District 1, I implore you to take into consideration the concerns and pleads of your constituents and oppose the rezoning of 8101 East Drive.

Thank you for your time and consideration,
Shannon Browning
1633 Alnwick Drive
916-532-7831

LETTER 72: SHANNON BROWNING

Response to Comment 72-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 73

TO WHOM IT MAY CONCERN:

RE: Proposal to put High Density Multiple Housing Units on the lot behind Bedrosian's

73-1 I oppose the building of 93 units of low income high density housing units on 3.1 acre lot behind my home at 11652 Graeagle Lane, Auburn. CA.The back of my home faces this lot. Most of the owners of the properties in this area are older people and we have a very good and quiet neighborhood. My yard is nicely landscaped and it is a joy sitting outside and I enjoy it very much. If these homes were built, it would decrease the value of my home, there would be a lot of noise, I would lose my privacy and there would be a lot more traffic in the area. We already have a lot of traffic in the area going and coming from Regional Park. There are a lot of accidents now on #49 and Dry Creek Road and that would only make it a higher accident risk.

Please consider the problems the owners of these homes would face and do not approve the proposal for this to happen. Thank you for giving your consideration to this matter.

Sincerely,

Bernice Bryant

Bernice Bryant
11652 Graeagle Lane
Auburn, Ca. 95602

RECEIVED
FEB 20 2024
CDRA - Planning

LETTER 73: BERNICE BRYANT

Response to Comment 73-1

Please see Master Response 2 – Social and Economic Impacts and Master Response 4 – Traffic Safety.

Letter 74

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element Program #26 Meeting on February 13th
Date: Tuesday, February 20, 2024 9:19:24 AM

-----Original Message-----
From: joseph buckwalter <jbuckwal52@gmail.com>
Sent: Monday, February 12, 2024 5:39 PM
To: Board Clerk <BoardClerk@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Housing Element Program #26 Meeting on February 13th

Hello,
I would like to comment on the rezoning of the parcel at 8989 Auburn Folsom Road. It is parcel number 26.
There is a creek that runs thru this parcel which puts part of it in a Flood Zone. It needs to be studied in more detail before it is included in the rezone effort. There is no way the 17 acres would be able to be used fully.
I live on this creek and we now have to pay flood insurance because of its zoning. This proposed parcel would be limited by this same Flood Zone designation.
I would like my comments to be included in this very short notice meeting for February 13th.
Thanks,
Joseph Buckwalter

Sent from my iPad

74-1

LETTER 74: JOSEPH BUCKWATER

Response to Comment 74-1

Impacts related to flood hazards are addressed in Section X, Hydrology and Water Quality, of the Initial Study prepared for the proposed project. As discussed therein, future development of the rezone sites located within a FEMA Flood Hazard Zone, including Rezone Site #26, would be required to comply with several General Plan policies related to flood hazards as well as Article 15.52, Flood Damage Prevention Regulations, of the Placer County Code, which is intended to minimize public and private losses due to flood conditions, including where public facilities and utilities are located within areas of special flood hazard. In addition, if future development on the rezone sites is anticipated to occur within the 100-year floodplain, a CLOMR would be required to be submitted to FEMA to update the floodplain information to reflect the proposed conditions. Therefore, potential impacts related to flood hazards have been adequately addressed in the Draft EIR.

Letter 75

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: For submission to HCD Review of Amendments
Date: Monday, March 11, 2024 10:05:28 AM
Attachments: Amendment objections submitted for HCD review.docx

From: Laura Bullard <bullardll@aol.com>
Sent: Friday, March 8, 2024 10:54 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: For submission to HCD Review of Amendments

March 7, 2024

To: Whom It May Concern

From: Laura Bullard, concerned resident

bullardll@aol.com

Re: Housing Element Amendments for Placer County

75-1 I wish to record my **major objections to the rezoning plan that has been presented by Placer County to meet the low income housing requirement**. This plan has not been well thought out or vetted with the communities they will impact. Besides the problems noted below in terms of impacts on local communities, I **do not believe that it is really intended to bring about the goal of affordable housing for county**. Further, the **public was only made aware of these changes on Friday, February 9 by a 3 x 5 sign** posted somewhere on each of the lots that was being considered. These signs were posted in areas where they would not

75-2 necessarily be noticeable by anyone not specifically looking for them. Even people sitting on local MAC's said they were unaware of the specifics of this plan. And property owners who were within 300 feet of the plan were not adequately notified of the plan. And attempts to find out addition clarification on specifics of the plan have been difficult to come by.

In addition to the above, I submit the following:

:

75-3 1) **The major <u>new developments</u> have not been made to meet the 10% obligation for low income housing allotments that the county already had in place as per previous resolutions and planning articles.** Had they made these developments (which sit on large tracts of land--100's of aces), it would have dealt with the shortfall. In reading over the Martinez vs. City of Clovis lawsuit, it seem that it partly dealt with a similar issue of the county not working to actually build low income (affordable) housing) as per it's previous stated criteria.

75-4 2) **The places that have been chosen for the current rezoning are in long-established communities that are not viable places** because of **infrastructure issues and environmental constraints on those properties** (example: water table and flood issues). Those existing houses communities house many **senior citizens** who have lived here for decades and may, in fact, be on **limited incomes** which would make **problems that are brought by the addition of apartments nearby on their own wells and septic systems not manageable.** One of the senior residents in the area had their well go dry because of the addition of the city of Roseville pumping and had to be hooked to city water. In many cases, they want the resident to pay for the hook up, plus many do not wish to be on city water. The roads do not have street lights (which the community prefers because they are RURAL communities nor sidewalks (nor is it feasible to build sidewalks there) thus making any additional traffic along these roads a problem. They are also rural communities (1-2 acre minimum as per the previous zoning) and have livestock, children ride horses around the block, etc. They are not communities were apartments would be in any way fit the existing lifestyle of the residents.

75-5 Two **additional problems which were studied extensively by members of our community who were involved in the Dry Creek Specific Plan** (which the county seems to be ignoring now) were: 1 the need for open space to **replenish the underground aquafer** (they were told that it took 23 inches of rain to increase the aquafer by 1"). **With the extensive paving over of the open spaces and the additional pumping of water by the City Of Roseville** from underground, the underground water supply will be severely diminished-hence causing those on wells to have to either extend their pipes or the wells re-drilled at extensive cost to the property owners. 2) There is apparently a possible **contamination issue** of the

75-6 underground aquafer if the water table drops to low from contaminated wells over by McClellan Air Force base.

75-7 **Two of the sites in the Dry Creek specific area (9 & 10) are right across from a school** (Creekview Ranch) which is on a **two lane road** where traffic accidents are a major concern. Also, the these local areas are **serviced by the sheriffs department** which is slow to respond to problems due to staffing issues. An officer who was called there to do traffic mitigation across from the school had to be called from a station over 30 miles away. When another incident happened on the school grounds last year with a **person on drugs**, the response time from the time for the sheriff's office was over **45 minutes** with the students having to be contained by the teachers to keep them safe.

75-8 Two of the other **sites (7 & 8)** in this area actually are part of a **flood plain** (which also has affected the wells in this area). In the event that the water is not allowed to flow across these sites, neighbors on properties near East Drive (lot 8) go underwater. This is a long standing problem that these residents have had to fight both with the county and the city of Roseville to mitigate. **So a lot of these lots would not even be feasible to build upon**.

75-9 3) **The criteria that the county used to seek out sites for rezoning were relatively random** such as:

75-9 con't

-The idea of seeking out "**underutilized**" land is a **subjective measure**. For example, saying that a plot of land which now hosts a **strawberry and vegetable patch which feeds the local community** is hardly "underutilized."

-Additionally, the idea that they **would only seek out property owners who were "willing" to rezone is questionable**. Whether these landowners even fully realize what they are agreeing to from both the impact on the community as well as possible jeopardizing their own future to be able to sell their land is questionable. One of the people is a local, long time resident who, when asked, said that he was given a 300 page document that he was going to have to let his lawyer look at and that he was told by the county to refer all questions to the county.

-When questioned about whether the county had gone back to the developers whom they had let out of the 10% obligation (and who's land has not yet been built upon), the answer from the county was basically "in some cases yes and in some cases no."

75-10

-The **idea that it has to be under 10 acres** looks like it was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation (although the county keeps blaming the state for everything),. It was just the agreement Martinez's attorneys were able to make with the city of Clovis And the settlement in Clovis dealt with a city--not a county-where space would be limited. **A lot of the new developments are on 100's of acres of land** that can be planned on a large scale and have the **ability to install infrastructure**

75-11

-One of the developments was supposed to have made some sort of contribution to the **Acres of Hope** to make up for the units they were supposed to have built (which should have been about 88). The **county has been unable to provide any information on if these units were ever, if there is a plan to build them or if the other developments within that plan also made a similar deal.** The site which was originally slotted for low income housing on this specific plan (corner of Watt and PFE) has not been developed and is actually far closer to facilities like stores and a day care center and high school than are most of the other lots that area being considered in that area. In addition, there is an entire strip of vacant land on PFE Road which backs up to the Sac County line that would be perfect for apartments not only because of it's proximity to stores and school, but also because infrastructure has to be built here for the additional housing that has been approved. There will also be a vast number of jobs close by when the new Costco the county recently approved goes in. So why would these sites be more aggressively pursued if the end goal is actually to provide affordable housing that has all the additional services?

75-12

-There is **another site out in Sheridan** that also lacks the services such as stores, etc. since it is located 15 miles from the nearest stores (other than a mom and pop convenience store). And this area also lacks the police presence. I have not had time to research the other rural sites that have been thrown into this mix, but now each of these because of my dealings in these communities.

75-13

4) This plan did not adequately involve the public nor local governmental

75-13 con't | **groups** such as the school boards of the districts to which the students from these developments would be going (posting the signs on a Friday night before a Tuesday meeting which was reviewing it is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable).

75-14 | Thank you for taking the time to consider these issues. If you need further information, please contact me at the email above.

75-15

Development	# housing units	Low income units	acreage	10%	deficit
Bickford Ranch (Lincoln)	1049	0	1927.9 ac	105	-105
Placer Ranch (Dry Creek)	2382	437 very low	360.41 ac	239	
Placer Vineyards (DC)	14132	404	951.7 ac	1413	1009
Regional University	640	349	64.3 ac	64	
Riolo Vineyards (DC)	878	0	258.4 ac	88	-88
Valley at Squaw (Tahoe)	10,630	1190	1974.43 ac	1063	
Placer Co. General Plan	353	0	29.61 ac		-5.69
Bowman	1084	405	73.36 ac	108	
Dry Creek West Placer	54	0	15.81 ac		
Foresthill comm plan	80	0	22.15 ac		
Sheridan	37	0	4.4 ac		
		deficit/ large scale dev			-1207.69
		& Co owned			

LETTER 75: LAURA BULLARD

Response to Comment 75-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 75-2
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, a summary of the outreach can be found in the Housing Element Amendment Appendix F, Page F-11.

Response to Comment 75-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 75-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 75-5
Potential impacts related to groundwater recharge and water quality are discussed in Section X, Hydrology and Water Quality, of the Initial Study; water supply is discussed in Section XIX, Utilities and Service Systems, of the Initial Study. Furthermore, it is noted that all of the proposed rezone sites would be served by surface water. In addition, potential development on Roseville-area rezone sites would have a de minimis impact on groundwater recharge.

Response to Comment 75-6
Please see Response to Comment 75-5. In addition, groundwater resources are not proposed to be used for the rezone sites in the Dry Creek area.

Response to Comment 75-7
Please see Master Response 4 – Traffic Safety. In addition, potential impacts related to transportation are addressed in Chapter 8 of the Draft EIR. Furthermore, response times are not a CEQA concern unless a new facility would be required to be constructed to ensure compliance with adopted response times. However, the concern has been provided to the decision-makers.

Response to Comment 75-8
Although a portion of the northeast corner of Rezone Site #7 is within the floodplain; Rezone Site #8 is not within a flood plain. The proposed project does not include any site-specific development plans, designs or proposals, but the Draft EIR conservatively assumes future residential development on the rezone sites. Impacts to the flood plain on Rezone Site #7 would be analyzed during site-specific development review. Furthermore, impacts related to flood hazards are programmatically addressed in Section X, Hydrology and Water Quality, of the Initial Study prepared for the proposed project. As discussed therein, future development of any rezone sites located within a FEMA Flood Hazard Zone would be required to comply with several General Plan policies related to flood hazards as well as Article 15.52, Flood Damage Prevention Regulations, of the Placer County Code, which is intended to minimize public and private losses due to flood conditions, including where public facilities and utilities are located within areas of special flood hazard. In addition, if future development on the rezone sites is anticipated to occur within the 100-year floodplain, a CLOMR would be required to be submitted to FEMA to update the floodplain information to reflect the proposed conditions. Therefore, potential impacts related to flood hazards have been adequately addressed in the Draft EIR.

Response to Comment 75-9
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 75-10
Large size sites are addressed on Page F-36 of the Housing Element Amendment Appendix F.

Response to Comment 75-11
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 25-1.

Response to Comment 75-12
Please see Master Response 1 – Non-EIR/Administrative Issues. The services available for Rezone Sites #11 and #13 are detailed on the Site Inventory Forms located in Appendix C of the Draft EIR.

Response to Comment 75-13
Please see Response to Comment 75-2.

Response to Comment 75-14
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 75-15
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 76

March 18, 2024

To: Whom It May Concern

From: Laura Bullard, Placer County Concerned Resident

The DEIR for the proposed Placer County high density housing is flawed for many reasons. In an **attempt to rectify the problems created by the fact that the county has not made the new developments within the county over the past 20 years meet their 10% low-income housing requirement (per county resolution),** they are willingly ignoring the massive problems created by their proposed rezoning with the explanation, "It is housing the probably won't be built anyway because most developers don't want to build that type of housing as it is not cost effective for them." **If the plan is to not build such housing, then the logic works well to purposely put that zoning of lands that are not feasible to build upon. If that is not the plan, then the following environmental impacts can not be ignored**.

76-1

Specifically highlighted here are proposals in three areas of the county. Two of which I am personally familiar and one that I have only become acquainted with over the past 3 weeks in listening to testimony given by individuals in those areas given at Board of Supervisor and Planning Commission meetings.

The **four proposed sites (7, 8, 9, & 10) within the Dry Creek Community** have multiple flaws-with some of the problems with each site listed individually—which is part of the problem with **the report as it does not cover each site individually** but, as was **stated by the county planners (and a supervisor), is "only a broad statement for the county and when a specific proposal comes in, then those specific issues will be mitigated**." This would be after the rezoning has already taken place and the wheels have been set in motion to attempt to build high-density housing in an area that should not have it. **Broadly speaking, however, all of these sites are covered by finite county resources (Cal Fire, Placer County Sheriff)** which are extremely limited in time response and will endanger the lives of those who reside here as a larger and larger population is forced into this small area. **All of these proposed sites are surrounded by long-standing 1-2 acre minimum parcels** whose residents are on **wells and septic systems and rely on the ground water** which is **being depleted** by the **sinking of large wells by the city of Roseville**—potentially causing these long established small wells to go dry or be contaminated by infiltration of contaminants identified years ago from the nearby shut down air force base. And the addition of these long-established rural properties to city water may force these agricultural parcels, many of which have livestock, to not be able to afford to keep their properties properly watered not only for the livestock but also for fire mitigation. **All of these parcels (7, 8, 9, & 10) are currently zoned**

76-2

76-3

76-3 con't

agricultural/low density housing which is not only in keeping with the lifestyle of the residents also **allows for enough open space to provide somewhat for the replenishing of the underground aquafers which feed the area**- something which is currently threated by the encroaching city paving and would be further exacerbated by the paving required for high-density housing. And all of these proposed **sites feed the local elementary school district (Dry Creek Elementary**) and that **school district was never consulted about the impact** to the local school system. The high school district (Roseville High School district) may also not have been contacted.

76-4

In addition to the above-mentioned problems, **lot 7 (Vineyard Road)** is in a **flood plain** making it highly unlikely to be able to be built upon—at least for high density housing. The **dry creek bed** that runs through this property is the **flow for areas connected to lot 8** and **any restriction of flow through this area risks the flooding of houses near area 8 (East Drive)**. This **drainage would also eventually flow into Dry Creek** and potentially threaten the habitat there (along with the current wildlife that live within this parcel). Additionally, this is directly **adjacent on one side to a new development** that is being built in which the residents were unaware that this high-density housing rezoning was being proposed. On the **other side, it is surrounded by a large tract of agricultural land that then borders smaller rural housing** again with landowners who have **wells, septic systems and livestock**.

Lot 8 (East Drive AKA The Strawberry field) is also currently **zoned agricultural/low density housing**. It serves the local community by providing fresh fruit and vegetables. It is the **start of the flow area for drainage from the surrounding community down to lot 7 and away**. In the past, additional drainage from the city of Roseville (across Baseline) has caused backup of water across the lower parcels and creating flooding havoc for properties near to East Driver. **All lots adjacent to this proposed rezoning are 1-2 acre minimums (several of which have livestock or bees).** At least one property bordering this **lot had their well run dry in recent years** and they were **unable to redrill a well because of the flood plain issue.** Another lot directly adjacent to it has **goats** which have been known to escape their pens. On East Drive, Carol Lane and Central (the country roads sitting right beside this proposed site) has **small country roads without sidewalks or street lights** on which people **ride horses and walk their dogs** around the block. The **area directly connected** to it has **over 30 senior citizens who have lived in this community for 30-80 years**. Suddenly **brining in high-rise, high-density apartment buildings would be a total destruction of their community on numerous levels**.

76-5

Lots 9 & 10 are **directly across from an elementary school** (K-8) which currently is at capacity. It also sits on a **rural two-lane road** which has **numerous**

76-5 con't

accidents. It is also **served by the county sheriff's office** and has had **problems with response times in emergency situation**s. This site also sits almost adjacent to the local creek (Dry Creek) which has had flooding issues but runoff from the **additional paving required by an apartment complex could pose toxic runoff problems into said creek**. The additional **traffic congestion** caused by this development on that **two-lane road would be detrimental to land owners farther up the road**.

76-6

Moving out of the Dry Creek area, the proposal to put apartments in the **Sheridan area** is flawed for multiple reasons. First, the lack of resources such as **fire and police protection** (served by the county sheriff). Second, the **lack of access to shopping** (there is only a small convenience store in town and the nearest availability of large-scale shopping is more than 15 miles away). There are also **not local jobs and there is not access to any regional transit.**

76-7

It needs to be stated that most of these area properties that the County has specifically pursued—not a developer pursuing the County for a rezone—except it seems for one property in **Auburn** in which the **developer is wanting to put luxury apartments** into an area near a ravine that was previously not zoned for apartments. **If this develop goes in for luxury apartments, it seems that it would not meet the purpose of this rezoning proposal which is to find places for low-income, high-density housing—thus causing the County to seek other places for those units.**

76-8

As you should be able to see, **the overall DEIR submitted by Placer County is flawed on multiple counts and needs to be sent back for further review of individual sites** if the goal is to make a plan that works and not destroy existing communities.

LETTER 76: LAURA BULLARD

Response to Comment 76-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 76-2

The proposed project does not include any site-specific development plans, designs, or proposals, but the Draft EIR conservatively assumes future residential development on the rezone sites. Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

The commenter appears to express concern that neither CAL FIRE, nor the Placer County Sheriff' Office can adequately serve new development. The discussion on page 10-35 of the Draft EIR, regarding fire protection services, is also applicable to law enforcement services. As stated,

> The approach to analyzing a project's impacts on fire protection services, pursuant to CEQA, is often misunderstood. Industry practice has often focused on any type of demand upon a fire department or district that may be generated by a project, such as an increased need for staffing, or the need for new firefighting equipment. These are important considerations, but they are not CEQA considerations per se. This important point can be seen by a careful reading of the language in Appendix G of the CEQA Guidelines (Section XV. Public Services). The language focuses on whether a project's increase in demand is such that a fire service provider would need to build new or expand existing governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives. The reason for this focus is that building new facilities, or expanding existing facilities, requires construction activities and disturbance of the physical environment, which is the focus of CEQA.
>
> According to CEQA Guidelines Section 15002(g), a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project. "Environment" means the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance (PRC Section 21060.5).
>
> The courts have affirmed this understanding. In the case *City of Hayward v. Board of Trustees of the California State University,* the First District Court of Appeal affirmed that the focus of CEQA analysis should be limited to physical environmental impacts related to a project.[1] The court held that, "The need for additional fire protection services is not an *environmental* impact that CEQA requires a Project Proponent to mitigate." In addition, while lack of funding to operate existing fire protection facilities is an important consideration, it is not directly relevant to CEQA.
>
> With this important understanding, the analysis can proceed with appropriately focusing on an evaluation of whether the project's demand upon fire service providers would generate the need to build new fire protection facilities or expand existing facilities.

[1] First District Court of Appeal. *City of Hayward v. Board of Trustees of the California State University*. (November 30, 2015) 242 Cal.App.4th 833.

Based on the analysis within the Initial Study (Appendix A to the Draft EIR) and Draft EIR (Chapter 10), it was determined that neither an expanded or new fire station, nor a Sheriff sub-station would be required to serve the proposed project.

With respect to the generally expressed concerns about CAL FIRE, as discussed under Impact 10-1 in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, Placer County Fire Department personnel confirmed in correspondence with the County that the existing fire stations that would serve and are located proximate to the rezone sites would be adequate to serve the proposed rezone sites. Rezone sites in Dry Creek would be served by Dry Creek Station 100, located at 8350 Cook Riolo Road. Furthermore, a new fire station is planned to be developed as part of the Placer Vineyards Specific Plan.

As discussed under Impact XV-2 of the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR, increased property taxes associated with future residential development on rezone sites would contribute to County Public Safety funding, which can be used to offset increased demands placed on the Placer County Sheriff's Office (PCSO) as a result of increased population. Additionally, the majority of sites are located along major roadway corridors and/or within urbanized areas of the County, where PCSO response times are more efficient. Thus, the proposed project would not result in a need for new, or improvements to existing, sheriff protection facilities.

Response to Comment 76-3

Please see Response to Comment 75-5. In addition, a summary of the outreach can be found in the Housing Element Amendment Appendix F, Page F-11.

Response to Comment 76-4

Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 75-8.

Response to Comment 76-5

Please see Master Response 4 – Traffic Safety, Master Response 6 – Impacts to Local Schools, and Response to Comment 76-2.

Response to Comment 76-6

Please see Response to Comment 75-12.

Response to Comment 76-7

The County has not received development proposals for any site except for Rezone Sites #17 and #18, located in Penryn. When future applications are received on the rezone sites, the County will conduct a no-net-loss analysis to ensure that site development does not put the County into a RHNA deficit. If it does, additional properties will need to be rezoned to RM30 to accommodate the County's RHNA numbers.

Response to Comment 76-8

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 77

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: For submission to HCD Review of Amendments
Date: Monday, March 11, 2024 10:05:28 AM
Attachments: Amendment objections submitted for HCD review.docx

From: Laura Bullard <bullardll@aol.com>
Sent: Friday, March 8, 2024 10:54 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: For submission to HCD Review of Amendments

March 7, 2024

To: Whom It May Concern

From: Laura Bullard, concerned resident

bullardll@aol.com

Re: Housing Element Amendments for Placer County

77-1

I wish to record my **major objections to the rezoning plan that has been presented by Placer County to meet the low income housing requirement**. This plan has not been well thought out or vetted with the communities they will impact. Besides the problems noted below in terms of impacts on local communities, I **do not believe that it is really intended to bring about the goal of affordable housing for county**. Further, the **public was only made aware of these changes on Friday, February 9 by a 3 x 5 sign** posted somewhere on each of the lots that was being considered. These signs were posted in areas where they would not necessarily be noticeable by anyone not specifically looking for them. Even people sitting on local MAC's said they were unaware of the specifics of this plan. And property owners who were within 300 feet of the plan were not adequately notified of the plan. And attempts to find out addition clarification on specifics of the plan have been difficult to come by.

In addition to the above, I submit the following:

:

1) The major <u>new developments</u> have not been made to meet the 10% obligation for low income housing allotments that the county already had in place as per previous resolutions and planning articles. Had they made these developments (which sit on large tracts of land--100's of aces), it would have dealt with the shortfall. In reading over the Martinez vs. City of Clovis lawsuit, it seem that it partly dealt with a similar issue of the county not working to actually build low income (affordable) housing) as per it's previous stated criteria.

77-1 cont.

2) **The places that have been chosen for the current rezoning are in long-established communities that are not viable places** because of **infrastructure issues and environmental constraints on those properties** (example: water table and flood issues). Those existing houses communities house many **senior citizens** who have lived here for decades and may, in fact, be on **limited incomes** which would make **problems that are brought by the addition of apartments nearby on their own wells and septic systems not manageable.** One of the senior residents in the area had their well go dry because of the addition of the city of Roseville pumping and had to be hooked to city water. In many cases, they want the resident to pay for the hook up, plus many do not wish to be on city water. The roads do not have street lights (which the community prefers because they are RURAL communities nor sidewalks (nor is it feasible to build sidewalks there) thus making any additional traffic along these roads a problem. They are also rural communities (1-2 acre minimum as per the previous zoning) and have livestock, children ride horses around the block, etc. They are not communities were apartments would be in any way fit the existing lifestyle of the residents.

Two **additional problems which were studied extensively by members of our community who were involved in the Dry Creek Specific Plan** (which the county seems to be ignoring now) were: 1 the need for open space to **replenish the underground aquafer** (they were told that it took 23 inches of rain to increase the aquafer by 1"). **With the extensive paving over of the open spaces and the additional pumping of water by the City Of Roseville** from underground, the underground water supply will be severely diminished-hence causing those on wells to have to either extend their pipes or the wells re-drilled at extensive cost to the property owners. 2) There is apparently a possible **contamination issue** of the underground aquafer if the water table drops to low from contaminated wells over by McClellan Air Force base.

Two of the sites in the Dry Creek specific area (9 & 10) are right across from a school (Creekview Ranch) which is on a **two lane road** where traffic accidents are a major concern. Also, the these local areas are **serviced by the sheriffs department** which is slow to respond to problems due to staffing issues. An officer who was called there to do traffic mitigation across from the school had to be called from a station over 30 miles away. When another incident happened on the school grounds last year with a **person on drugs**, the response time from the time for the sheriff's office was over **45 minutes** with the students having to be contained by the teachers to keep them safe.

Two of the other **sites (7 & 8)** in this area actually are part of a **flood plain** (which also has affected the wells in this area). In the event that the water is not allowed to flow across these sites, neighbors on properties near East Drive (lot 8) go underwater. This is a long standing problem that these residents have had to fight both with the county and the city of Roseville to mitigate. **So a lot of these lots would not even be feasible to build upon**.

3) **The criteria that the county used to seek out sites for rezoning were relatively random** such as:

77-1 cont.

-The idea of seeking out "**underutilized**" land is a **subjective measure**. For example, saying that a plot of land which now hosts a **strawberry and vegetable patch which feeds the local community** is hardly "underutilized."

-Additionally, the idea that they **would only seek out property owners who were "willing" to rezone is questionable**. Whether these landowners even fully realize what they are agreeing to from both the impact on the community as well as possible jeopardizing their own future to be able to sell their land is questionable. One of the people is a local, long time resident who, when asked, said that he was given a 300 page document that he was going to have to let his lawyer look at and that he was told by the county to refer all questions to the county.

-When questioned about whether the county had gone back to the developers whom they had let out of the 10% obligation (and who's land has not yet been built upon), the answer from the county was basically "in some cases yes and in some cases no."

-The **idea that it has to be under 10 acres** looks like it was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation (although the county keeps blaming the state for everything). It was just the agreement Martinez's attorneys were able to make with the city of Clovis And the settlement in Clovis dealt with a city--not a county-where space would be limited. **A lot of the new developments are on 100's of acres of land** that can be planned on a large scale and have the **ability to install infrastructure**

-One of the developments was supposed to have made some sort of contribution to the **Acres of Hope** to make up for the units they were supposed to have built (which should have been about 88). The **county has been unable to provide any information on if these units were ever, if there is a plan to build them or if the other developments within that plan also made a similar deal.** The site which was originally slotted for low income housing on this specific plan (corner of Watt and PFE) has not been developed and is actually far closer to facilities like stores and a day care center and high school than are most of the other lots that area being considered in that area. In addition, there is an entire strip of vacant land on PFE Road which backs up to the Sac County line that would be perfect for apartments not only because of it's proximity to stores and school, but also because infrastructure has to be built here for the additional housing that has been approved. There will also be a vast number of jobs close by when the new Costco the county recently approved goes in. So why would these sites be more aggressively pursued if the end goal is actually to provide affordable housing that has all the additional services?

-There is **another site out in Sheridan** that also lacks the services such as stores, etc. since it is located 15 miles from the nearest stores (other than a mom and pop convenience store). And this area also lacks the police presence. I have not had time to research the other rural sites that have been thrown into this mix, but now each of these because of my dealings in these communities.

4) This plan did not adequately involve the public nor local governmental

77-1 cont.

groups such as the school boards of the districts to which the students from these developments would be going (posting the signs on a Friday night before a Tuesday meeting which was reviewing it is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable).

Thank you for taking the time to consider these issues. If you need further information, please contact me at the email above.

LETTER 77: LAURA BULLARD

Response to Comment 77-1

Please see Responses to Comment Letter 75.

Letter 78

February 12, 2024

To Whom It May Concern in Placer County Government:

Re: proposed rezoning of area along Baseline Road and East Drive in western Placer County

78-1 The rezoning of this area (which **has been a 1-2 acre minimum for over 60 years**) is a travesty beyond travesties. This is a community in which people move into an agricultural area and stay—with their children coming back to this area to be part of the neighborhood in which they grew up. I moved to a home adjacent to East Drive when I was 18 months old. My mother still lives in the house that I grew up in. We were in 4-H and raised animals and road our horses in the area. I taught at the local high school (I opened Woodcreek and taught at Roseville High for 7 years before that). Several of the students that I taught at Woodcreek **still ride their horses around the block**. Our neighbors have all lived in their houses for over 30 years or recently purchased their property from people who passed away and they wanted to come to the community in which they grew up to raise their children here. This weekend their were **cows grazing** right next to the land that is being proposed for apartments and couples were walking around the block with their dogs.

78-2 **You are not talking about making a simple zooming change—you are talking about ruining a community,** and I am not sure what makes you believe that you have the right to do so. As a former AP Government teacher, I always **taught that government was meant to help** and that there were **processes in place to make sure that decisions are made slowly and deliberately** so that **all sides are heard** and the laws and regulations that come out are well thought out and meant for the **benefit of all**. I see **nothing in what is happening here that meets the criteria** that I taught my students. For example, the **sign saying that there was going to be a rezoning proposed was posted on Friday**, February 9 at the corner of the strawberry patch. When some of our local residents saw this and scanned the **QR code** on it (this wouldn't even be a concept for the senior members of our community who may or may not even have the ability to do that), it showed that there was going to be a meeting regarding this on **Tuesday, February 13**. Not much time for the citizens to give much feedback nor time for people who may be working to actually participate. There was a second meeting listed for February 22 but still not much time given for feedback. In addition, I am **reading the county link to the information about what is happening and even as a person who taught government, it will take me a while to look through all the information and assess the various components**—not something that just happens overnight and especially on a Super Bowl weekend (meaning many people would not have the time to pay attention to or address the

78-2 cont. issue) and on a weekend when people are busy with other things happening in their lives.

Part of what I am seeing at first glance at your posting is that the **county seems panicked that if the county doesn't meet a rezoning goal they will lose their land use authority if they don't implement something by May of 2024.** (see below) This sounds like **bad planning on the part of the county.** In essence, you are saying that because you did not do proper work ahead of time, you are trying to rush through (hopefully while no one is looking) a proposal to ruin a neighborhood. **Where was the process on this? What are the alternatives to meeting these goals that don't involve ruining neighborhoods** by suddenly placing high density apartments in an area that has been previously 1-2 acre minimum zoning? **Where was the public input?** While there is the appearance of public meetings through claimed MAC meetings, etc. But unless people actually sit on those committees or know that the information is being presented, there would be no reason that members of the community would be at those meetings. I own homes in two parts of this county and heard nothing about any meetings regarding the issue.

78-3

One of the things that you claim in your reasoning behind the location of these rezoning areas is that you took into account infrastructure. I present the following in regards to this particular spot on Baseline Road:

78-4

This particular rezoning would create an incredible traffic hazard situation. If anyone knows the area, they know that the alignment of the **roads from East Drive to the road across Baseline are misaligned so that people turning off Baseline onto Americana and people turning off Baseline onto East Drive are placed into the center turn lane so that they almost collide on a regular basis.** Add to that fact that people drive up the center lane as if it were a drive lane because of the fact that there is only one drive lane on the county side=more collisions. Then add the idea of **cars for 100's of apartment dwellers** and people from those apartments trying to **cross Baseline on foot to get to stores or schools** on the other side, there is now a recipe for disaster. Add also the fact that **East Drive is a short street** that **currently has very little traffic** will now be impacted by 100's of cars. Additionally, there is a **hill at midsection of the road which hides the side street of Carol Lane** and even with the small amount of traffic that now is on the road, it is a place for collisions (I know as I was in a car that was **sideswiped** by someone coming over that hill when I was a child). Even now, people on East Drive regularly run the stop signs that are there so always extra caution has to be used by those of us pulling out from Carol Lane. Add 100's of cars and young drivers and you have another recipe for disaster.

78-4 cont.

Or is the intention to build a wall keeping the apartment residents off of East Drive? That would create an interesting view for those living close by but would solve the problem of the additional traffic on the road. But it also would landlock one of the homes on the east side of East Drive. In addition, this whole project will landlock another property to the east side of it who have their entrance along Baseline. That plan, however, does not address the **problem of dumping the additional traffic onto Baseline**. (As noted, the county side there has only one lane heading into Roseville.)

78-5

Beyond that, let's talk about the **psychological component** of this idea. Suddenly plopping a mass of apartments into an area that is basically agricultural in nature, **doesn't exactly seem like a good fit for those moving into those apartments**. One of the things that I also taught at the high school was Sociology and Psychology and one of things that we know is that **things which lead to deviance is a lack of cohesiveness within a community**. The community is currently very cohesive with people having a long-standing attachment to the area and pride in our local community. **Bringing a set of apartments into the area so that you can meet an "affordable rent" space does not bring people an attachment to the community** which can bring **deviant behavior and a need for additional law enforcement**. To see that ruined by a zoning change that may force people into an area because of "affordable rents" is an abomination This would lead to higher sheriff needs and on and on.

78-6

If for some reason the county perceives that this is the only available area to meet their housing needs under HE-1, then maybe an alternative proposal could meet some of your goals. A **proposal that would allow for a lower density of housing which allows people to actually own property rather than rent an apartment** would be a far better alternative to the idea of high-density apartments. You could even work with Habitat for Humanity to make the goal of home ownership a reality for some families. This would allow them to actually feel a sense of pride in the area.

78-7

All of these things tell me that this is not a very well thought out proposal and is meant to superficially meet some state mandate. While I recognize that you have put yourself behind a deadline that you feel compelled to meet, I urge your reconsideration of the this proposal. I am sure that better plans can be made.

Sincerely,

Laura Bullard

lbullard018@gmail.com

Why is a Rezone Program required?

Placer County's Housing Element program HE-1 is the Rezone to Meet the Regional Housing Needs Allocation (RHNA). Because the Housing Element did not identify sufficient sites to accommodate the RHNA across all income levels, state law requires the County to implement a rezone program to allow higher density residential development. Placer County is required to implement the programs identified in its Housing Element, and HE-1 must be implemented by May 15, 2024.

Failure to implement the Rezone Program could lead to the County losing its land use authority under Government Code Section 67555. If the County's land use authority were revoked, land use decisions would be made at the state level without local control or oversight. The County could also lose its recent Pro-Housing Designation and access to grant funding that supports local programs and initiatives.

LETTER 78: LAURA BULLARD

Response to Comment 78-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 78-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 78-3
Please see Master Response 1 – Non-EIR/Administrative Issues. Additionally, the Housing Element was adopted in 2021 by the Board of Supervisors. The Housing Element discusses the public outreach process on page 7 of Chapter 1. In addition to the outreach conducted for the Housing Element, Planning staff presented the rezone program to all affected Municipal Advisory Councils in June of 2023, and also conducted workshops, townhalls, and prepared a webpage to inform the public about the status of the project. The County's Public Information Office has also provided notices on the program on the County's main webpage and on its social media accounts.

Response to Comment 78-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. However, it is acknowledged that although East Drive and Americana Drive intersect Baseline Road at approximately the same location, East Drive is narrower than Americana Drive, leading to the traffic lanes being offset by approximately 10 to 15 feet. If Rezone Site #8 on East Drive were to be developed, the project applicant would be responsible for frontage improvements on Baseline Road and East Drive. Frontage improvements would include additional pavement width for Baseline Road, and curb, gutter, and sidewalk consistent with the applicable planning documents. Through these improvements, the Baseline Road/East Drive/Americana Drive intersection would be reconstructed to better align the north/south roadways.

The East Drive/Carol Lane intersection is currently controlled by an all-way stop, which requires drivers to stop at Carol Lane, allowing the drivers on Carol Lane to turn, if applicable. Additionally, if Rezone Site #8 on East Drive were to be developed, the project applicant would be required to provide access to the parcel that conforms to County standards. Site access considerations, such as sight distance requirements, are evaluated against County standards through the improvement plan review process.

Response to Comment 78-5
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 78-6
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, the proposed rezone sites are not limited to any one geographical area and sites are dispersed throughout all five of the Supervisorial Districts.

Response to Comment 78-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 79

From: Rachel
To: Placer County Environmental Coordination Services
Subject: Opposition to development of 8989 Auburn Folsom Road
Date: Thursday, March 7, 2024 2:48:51 PM

79-1 | I am a resident of Placer County and oppose the proposed development of the property located at 8989 Auburn Folsom Road. I am also requesting a formal EIR for Project 26.

Rachel Buller

LETTER 79: RACHEL BULLER

Response to Comment 79-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 80

From: Karen Burrell
To: Placer County Environmental Coordination Services
Subject: Rezoning on Old Auburn Road.
Date: Wednesday, February 28, 2024 7:00:19 PM

80-1 We are writing you with regard to the proposed rezoning of 4.8 acres on Old Auburn Road. The proposal to Rezone to R30 could potentially severely negatively impact the already heavy traffic on this two lane residential connector road between Sierra College Blvd and Cirby Way. A rezone of 30 units per acre will not only add a potential of 150 new units and thus at least 300 more vehicles a day entering and exiting onto Old Auburn Road, creating further back ups at both the Sierra College Blvd., and Cirby Way intersections, and also significantly change the rural/residential neighborhood too. We strenuously object to this change.

80-2 If our objections are not headed, we also request that any entrance and exit for this new potential neighborhood, be placed only on Sierra College Blvd, rather than on Old Auburn Road. That alone would significantly help to alleviate the otherwise inevitable horrendous traffic backups on Old Auburn Road.

Karen and Garland Burrell

Sent from my iPhone

LETTER 80: KAREN BURELL AND GARLAND BURELL

Response to Comment 80-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 80-2

The concern about access to Old Auburn Road is noted for the record and would be considered should the site be rezoned and an application be submitted at a later date for residential development. The proposed project does not include any site-specific development plans, designs, or proposals at this time. As such, the project's potential to substantially increase hazards to vehicle safety due to a geometric design feature cannot be specifically evaluated at this time. However, all new developments that occur within the County would be required to comply with all applicable design standards as part of constructing or modifying the transportation system. For example, Policy 3.A.2 of the Placer County General Plan requires all streets and roads to be constructed in accordance with General Plan, community plan, and specific plan standards.

Letter 81

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning Site #71 and Site 72
Date: Monday, March 11, 2024 4:04:12 PM

-----Original Message-----
From: Julie Burkett <juliejburkett@gmail.com>
Sent: Monday, March 11, 2024 1:11 PM
To: Christopher Pahule <cpahule@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Rezoning Site #71 and Site 72

Dear Placer Planning Department,

Site #71-APN 054-290-064-00-85 Lincoln Way, Auburn CA

Site #72-APN 054-290-065-000 85 Lincoln Way, Auburn CA

81-1 I moved to Auburn in 6/2024 from Penryn CA in which I was a resident for more than thirty-five years. During those years I saw some reckless decisions made by Placer County Planning Department in the unincorporated areas of Placer County. I've seen money talk and the good for the community ignored.

I am opposed to the high density RM30 rezoning of these properties just outside the city.

I see the potential of rezoning disastrous to:

81-2 -the environment

81-3 -the sewage system and other infrastructure-I currently live in a very low density neighborhood in which the sewerage systems are incapable of processing the waste and possibly contaminating the American River Canyon. Developments of the above can only worsen the environmental impact.

81-4 -the safety of our roads which are highly trafficked at this time. I have seen just how the construction of a roundabout can require hours of your time trying to move through The City of Auburn. Adding potentially hundreds of residents could permanently contribute to congestion and the safety of our roads.

81-5 Please consider other sites for high density projects to provide the needed affordable housing in our community.

Thank you for hearing my voice,

Julie Burkett
251 Aeolia Drive
Auburn CA 95603

LETTER 81: JULIE BURKETT

Response to Comment 81-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 81-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 81-3
As discussed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project, buildout of the rezone sites may result in the need for upgrades to existing sewer infrastructure depending on the size and location of future development. However, pursuant to General Plan Policy 4.D.3, the project applicant of each future residential development project on the rezone sites would be required to provide written certification from the sewer service provider that either existing services are available or needed improvements would be made prior to occupancy of the development. Compliance with General Plan Policy 4.D.3 would ensure that adequate capacity would be available to serve the projected demand generated by the future residential development of each rezone site, in addition to the County's existing commitments. Therefore, the impacts related to increased demand on utilities structure were concluded to be less-than-significant. As such, impacts related to such were adequately addressed in the Draft EIR.

Response to Comment 81-4
Please see Master Response 4 – Traffic Safety. In addition, with respect to potential impacts related to construction traffic, Mitigation Measure 8-1 requires the preparation of a Construction Traffic Management Plan for all future development of the rezone sites. Compliance with such would ensure that construction associated with future development would not result in traffic safety hazards.

Response to Comment 81-5
Please see Response to Comment 25-1.

Letter 82

From: Janice Burnham
To: Placer County Environmental Coordination Services; Planning Commission
Subject: Requesting a proper EIR for Project 26
Date: Friday, March 8, 2024 5:05:59 PM

Hello,

82-1 I'm voicing my concern about the high density 4 story housing that the county is rushing through at 8989 Auburn Folsom Rd near Cavitt Middle School. It's disheartening to see Granite Bay changing the zoning and putting in high density housing in so many areas and especially without doing a proper EIR. I'm a Granite Bay resident, moved her 3.5 years ago to escape the high density housing in the Bay Area. The environmental impacts for this proposed project should be conducted and thoroughly reviewed/discussed!

Thank you,
Janice Burnham
6130 Reba Dr
Granite Bay

LETTER 82: JANICE BURNHAM

Response to Comment 82-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 83

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning 71 and 72
Date: Wednesday, March 6, 2024 8:07:54 AM

-----Original Message-----
From: Jan Burnham <burnham_jan@yahoo.com>
Sent: Tuesday, March 5, 2024 10:26 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Rezoning 71 and 72

83-1 I oppose the zoning of 71 and 72 for low income housing.
Jan Burnham
Sent from my iPad

LETTER 83: JAN BURNHAM

Response to Comment 83-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 84

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:10:15 AM

From: Rick <pm95660@yahoo.com>
Sent: Friday, March 8, 2024 2:28 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Cc: Rick Burtzlaff <pm95660@yahoo.com>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

To:
Kally Kedinger kkedinge@placer.ca.gov
Jess Negrete jess.negrete@hcd.ca.gov

Subject:
COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

84-1

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.
2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.
3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have

84-1 cont

the ability to install infrastructure that would appropriately support high density low income housing.
4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.
For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Richard Burtzlaff
pm95660@yahoo.com

LETTER 84: RICHARD BURTZLAFF

Response to Comment 84-1

Please see Responses to Comment Letter 62.

Letter 85

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr., Ste 190
cdraecs@placer.ca.gov

Robyn Dahlgren
rdahlgren@placer.ca.gov

Bonnie Gore
supervisorgore@placer.ca.gov

Kally Kedinger-Cecil
Senior Planner
kkedinge@placer.ca.gov

85-1

The DEIR for the proposed Placer County high density housing is flawed for many reasons. In an **attempt to rectify the problems created by the fact that the county has not made the new developments within the county over the past 20 years meet their 10% low-income housing requirement (per county resolution),** they are willingly ignoring the massive problems created by their proposed rezoning with the explanation, "It is housing the probably won't be built anyway because most developers don't want to build that type of housing as it is not cost effective for them." **If the plan is to not build such housing, then the logic works well to purposely put that zoning of lands that are not feasible to build upon. If that is not the plan, then the following environmental impacts can not be ignored.**

Specifically highlighted here are proposals in three areas of the county. Two of which I am personally familiar and one that I have only become acquainted with over the past 3 weeks in listening to testimony given by individuals in those areas given at Board of Supervisor and Planning Commission meetings.

The **four proposed sites (7, 8, 9, & 10) within the Dry Creek Community** have multiple flaws-with some of the problems with each site listed individually—which is part of the problem with **the report as it does not cover each site individually** but, as was **stated by the county planners (and a supervisor), is "only a broad statement for the county and when a specific proposal comes in, then those specific issues will be mitigated.**" This would be after the rezoning has already taken place and the wheels have been set in motion to attempt to build high-density housing in an area that should not have it. **Broadly**

85-1 cont.

speaking, however, all of these sites are covered by finite county resources (Cal Fire, Placer County Sheriff) which are extremely limited in time response and will endanger the lives of those who reside here as a larger and larger population is forced into this small area. **All of these proposed sites are surrounded by long-standing 1-2 acre minimum parcels** whose residents are on **wells and septic systems and rely on the ground water** which is **being depleted** by the **sinking of large wells by the city of Roseville**—potentially causing these long established small wells to go dry or be contaminated by infiltration of contaminants identified years ago from the nearby shut down air force base. And the addition of these long-established rural properties to city water may force these agricultural parcels, many of which have livestock, to not be able to afford to keep their properties properly watered not only for the livestock but also for fire mitigation. **All of these parcels (7, 8, 9, & 10) are currently zoned agricultural/low density housing** which is not only in keeping with the lifestyle of the residents also **allows for enough open space to provide somewhat for the replenishing of the underground aquafers which feed the area**-something which is currently threated by the encroaching city paving and would be further exacerbated by the paving required for high-density housing. And all of these proposed **sites feed the local elementary school district (Dry Creek Elementary**) and that **school district was never consulted about the impact** to the local school system. The high school district (Roseville High School district) may also not have been contacted.

In addition to the above-mentioned problems, **lot 7 (Vineyard Road)** is in a **flood plain** making it highly unlikely to be able to be built upon—at least for high density housing. The **dry creek bed** that runs through this property is the **flow for areas connected to lot 8** and **any restriction of flow through this area risks the flooding of houses near area 8 (East Drive)**. This **drainage would also eventually flow into Dry Creek** and potentially threaten the habitat there (along with the current wildlife that live within this parcel). Additionally, this is directly **adjacent on one side to a new development** that is being built in which the residents were unaware that this high-density housing rezoning was being proposed. On the **other side, it is surrounded by a large tract of agricultural land that then borders smaller rural housing** again with landowners who have **wells, septic systems and livestock**.

Lot 8 (East Drive AKA The Strawberry field) is also currently **zoned agricultural/low density housing**. It serves the local community by providing fresh fruit and vegetables. It is the **start of the flow area for drainage from the surrounding community down to lot 7 and away.** In the past, additional drainage from the city of Roseville (across Baseline) has caused backup of water across the lower parcels and creating flooding havoc for properties near to East

Driver. **All lots adjacent to this proposed rezoning are 1-2 acre minimums (several of which have livestock or bees).** At least one property bordering this **lot had their well run dry in recent years** and they were **unable to redrill a well because of the flood plain issue.** Another lot directly adjacent to it has **goats** which have been known to escape their pens. On East Drive, Carol Lane and Central (the country roads sitting right beside this proposed site) has **small country roads without sidewalks or street lights** on which people **ride horses and walk their dogs** around the block. The **area directly connected** to it has **over 30 senior citizens who have lived in this community for 30-80 years**. Suddenly **brining in high-rise, high-density apartment buildings would be a total destruction of their community on numerous levels**.

85-1 cont.

Lots 9 & 10 are **directly across from an elementary school** (K-8) which currently is at capacity. It also sits on a **rural two-lane road** which has **numerous accidents.** It is also **served by the county sheriff's office** and has had **problems with response times in emergency situation**s. This site also sits almost adjacent to the local creek (Dry Creek) which has had flooding issues but runoff from the **additional paving required by an apartment complex could pose toxic runoff problems into said creek**. The additional **traffic congestion** caused by this development on that **two-lane road would be detrimental to land owners farther up the road**.

It needs to be stated that most of these area properties the County has specifically pursued—not a developer pursuing the County for a rezone.

As you should be able to see, **the overall DEIR submitted by Placer County is flawed on multiple counts and needs to be sent back for further review of individual sites.**

Richard Burtzlaff
District 1 homeowner
3275 Almond Blossom Ln
916-990-4394
Pm95660@yahoo.com

LETTER 85: RICHARD BURTZLAFF

Response to Comment 85-1

Please see Responses to Comment Letter 76.

Letter 86

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr., Ste 190
cdraecs@placer.ca.gov

Robyn Dahlgren
rdahlgren@placer.ca.gov

Bonnie Gore
supervisorgore@placer.ca.gov

Kally Kedinger-Cecil
Senior Planner
kkedinge@placer.ca.gov

86-1

The DEIR for the proposed Placer County high density housing is flawed for many reasons. In an **attempt to rectify the problems created by the fact that the county has not made the new developments within the county over the past 20 years meet their 10% low-income housing requirement (per county resolution),** they are willingly ignoring the massive problems created by their proposed rezoning with the explanation, "It is housing the probably won't be built anyway because most developers don't want to build that type of housing as it is not cost effective for them." **If the plan is to not build such housing, then the logic works well to purposely put that zoning of lands that are not feasible to build upon. If that is not the plan, then the following environmental impacts can not be ignored**.

Specifically highlighted here are proposals in three areas of the county. Two of which I am personally familiar and one that I have only become acquainted with over the past 3 weeks in listening to testimony given by individuals in those areas given at Board of Supervisor and Planning Commission meetings.

The **four proposed sites (7, 8, 9, & 10) within the Dry Creek Community** have multiple flaws-with some of the problems with each site listed individually—which is part of the problem with **the report as it does not cover each site individually** but, as was **stated by the county planners (and a supervisor), is "only a broad statement for the county and when a specific proposal comes in, then those specific issues will be mitigated**." This would be after the rezoning has already taken place and the wheels have been set in motion to attempt to build high-density housing in an area that should not have it. **Broadly**

B6-1 Cont.

speaking, however, all of these sites are covered by finite county resources (Cal Fire, Placer County Sheriff) which are extremely limited in time response and will endanger the lives of those who reside here as a larger and larger population is forced into this small area. **All of these proposed sites are surrounded by long-standing 1-2 acre minimum parcels** whose residents are on **wells and septic systems and rely on the ground water** which is **being depleted** by the **sinking of large wells by the city of Roseville**—potentially causing these long established small wells to go dry or be contaminated by infiltration of contaminants identified years ago from the nearby shut down air force base. And the addition of these long-established rural properties to city water may force these agricultural parcels, many of which have livestock, to not be able to afford to keep their properties properly watered not only for the livestock but also for fire mitigation. **All of these parcels (7, 8, 9, & 10) are currently zoned agricultural/low density housing** which is not only in keeping with the lifestyle of the residents also **allows for enough open space to provide somewhat for the replenishing of the underground aquafers which feed the area**-something which is currently threated by the encroaching city paving and would be further exacerbated by the paving required for high-density housing. And all of these proposed **sites feed the local elementary school district (Dry Creek Elementary**) and that **school district was never consulted about the impact** to the local school system. The high school district (Roseville High School district) may also not have been contacted.

In addition to the above-mentioned problems, **lot 7 (Vineyard Road)** is in a **flood plain** making it highly unlikely to be able to be built upon—at least for high density housing. The **dry creek bed** that runs through this property is the **flow for areas connected to lot 8** and **any restriction of flow through this area risks the flooding of houses near area 8 (East Drive)**. This **drainage would also eventually flow into Dry Creek** and potentially threaten the habitat there (along with the current wildlife that live within this parcel). Additionally, this is directly **adjacent on one side to a new development** that is being built in which the residents were unaware that this high-density housing rezoning was being proposed. On the **other side, it is surrounded by a large tract of agricultural land that then borders smaller rural housing** again with landowners who have **wells, septic systems and livestock**.

Lot 8 (East Drive AKA The Strawberry field) is also currently **zoned agricultural/low density housing**. It serves the local community by providing fresh fruit and vegetables. It is the **start of the flow area for drainage from the surrounding community down to lot 7 and away**. In the past, additional drainage from the city of Roseville (across Baseline) has caused backup of water across the lower parcels and creating flooding havoc for properties near to East

B6-1 Cont.

Driver. **All lots adjacent to this proposed rezoning are 1-2 acre minimums (several of which have livestock or bees).** At least one property bordering this **lot had their well run dry in recent years** and they were **unable to redrill a well because of the flood plain issue.** Another lot directly adjacent to it has **goats** which have been known to escape their pens. On East Drive, Carol Lane and Central (the country roads sitting right beside this proposed site) has **small country roads without sidewalks or street lights** on which people **ride horses and walk their dogs** around the block. The **area directly connected** to it has **over 30 senior citizens who have lived in this community for 30-80 years.** Suddenly **brining in high-rise, high-density apartment buildings would be a total destruction of their community on numerous levels.**

Lots 9 & 10 are **directly across from an elementary school** (K-8) which currently is at capacity. It also sits on a **rural two-lane road** which has **numerous accidents.** It is also **served by the county sheriff's office** and has had **problems with response times in emergency situation**s. This site also sits almost adjacent to the local creek (Dry Creek) which has had flooding issues but runoff from the **additional paving required by an apartment complex could pose toxic runoff problems into said creek.** The additional **traffic congestion** caused by this development on that **two-lane road would be detrimental to land owners farther up the road.**

It needs to be stated that most of these area properties the County has specifically pursued—not a developer pursuing the County for a rezone.

As you should be able to see, **the overall DEIR submitted by Placer County is flawed on multiple counts and needs to be sent back for further review of individual sites.**

Richard Burtzlaff
District 1 homeowner
3275 Almond Blossom Ln
916-990-4394
Pm95660@yahoo.com

LETTER 86: RICHARD BURTZLAFF

Response to Comment 86-1

Please see Responses to Comment Letter 76.

Letter 87

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr., Ste 190
cdraecs@placer.ca.gov

Robyn Dahlgren
rdahlgren@placer.ca.gov

Bonnie Gore
supervisorgore@placer.ca.gov

Kally Kedinger-Cecil
Senior Planner
kkedinge@placer.ca.gov

87-1

The DEIR for the proposed Placer County high density housing is flawed for many reasons. In an **attempt to rectify the problems created by the fact that the county has not made the new developments within the county over the past 20 years meet their 10% low-income housing requirement (per county resolution),** they are willingly ignoring the massive problems created by their proposed rezoning with the explanation, "It is housing the probably won't be built anyway because most developers don't want to build that type of housing as it is not cost effective for them." **If the plan is to not build such housing, then the logic works well to purposely put that zoning of lands that are not feasible to build upon. If that is not the plan, then the following environmental impacts can not be ignored**.

Specifically highlighted here are proposals in three areas of the county. Two of which I am personally familiar and one that I have only become acquainted with over the past 3 weeks in listening to testimony given by individuals in those areas given at Board of Supervisor and Planning Commission meetings.

The **four proposed sites (7, 8, 9, & 10) within the Dry Creek Community** have multiple flaws-with some of the problems with each site listed individually—which is part of the problem with **the report as it does not cover each site individually** but, as was **stated by the county planners (and a supervisor), is "only a broad statement for the county and when a specific proposal comes in, then those specific issues will be mitigated."** This would be after the rezoning has already taken place and the wheels have been set in motion to attempt to build high-density housing in an area that should not have it. **Broadly**

87-1 cont.

speaking, however, all of these sites are covered by finite county resources (Cal Fire, Placer County Sheriff) which are extremely limited in time response and will endanger the lives of those who reside here as a larger and larger population is forced into this small area. **All of these proposed sites are surrounded by long-standing 1-2 acre minimum parcels** whose residents are on **wells and septic systems and rely on the ground water** which is **being depleted** by the **sinking of large wells by the city of Roseville**—potentially causing these long established small wells to go dry or be contaminated by infiltration of contaminants identified years ago from the nearby shut down air force base. And the addition of these long-established rural properties to city water may force these agricultural parcels, many of which have livestock, to not be able to afford to keep their properties properly watered not only for the livestock but also for fire mitigation. **All of these parcels (7, 8, 9, & 10) are currently zoned agricultural/low density housing** which is not only in keeping with the lifestyle of the residents also **allows for enough open space to provide somewhat for the replenishing of the underground aquafers which feed the area**-something which is currently threated by the encroaching city paving and would be further exacerbated by the paving required for high-density housing. And all of these proposed **sites feed the local elementary school district (Dry Creek Elementary**) and that **school district was never consulted about the impact** to the local school system. The high school district (Roseville High School district) may also not have been contacted.

In addition to the above-mentioned problems, **lot 7 (Vineyard Road)** is in a **flood plain** making it highly unlikely to be able to be built upon—at least for high density housing. The **dry creek bed** that runs through this property is the **flow for areas connected to lot 8** and **any restriction of flow through this area risks the flooding of houses near area 8 (East Drive)**. This **drainage would also eventually flow into Dry Creek** and potentially threaten the habitat there (along with the current wildlife that live within this parcel). Additionally, this is directly **adjacent on one side to a new development** that is being built in which the residents were unaware that this high-density housing rezoning was being proposed. On the **other side, it is surrounded by a large tract of agricultural land that then borders smaller rural housing** again with landowners who have **wells, septic systems and livestock**.

Lot 8 (East Drive AKA The Strawberry field) is also currently **zoned agricultural/low density housing**. It serves the local community by providing fresh fruit and vegetables. It is the **start of the flow area for drainage from the surrounding community down to lot 7 and away**. In the past, additional drainage from the city of Roseville (across Baseline) has caused backup of water across the lower parcels and creating flooding havoc for properties near to East

87-1 cont.

Driver. **All lots adjacent to this proposed rezoning are 1-2 acre minimums (several of which have livestock or bees).** At least one property bordering this **lot had their well run dry in recent years** and they were **unable to redrill a well because of the flood plain issue.** Another lot directly adjacent to it has **goats** which have been known to escape their pens. On East Drive, Carol Lane and Central (the country roads sitting right beside this proposed site) has **small country roads without sidewalks or street lights** on which people **ride horses and walk their dogs** around the block. The **area directly connected** to it has **over 30 senior citizens who have lived in this community for 30-80 years**. Suddenly **brining in high-rise, high-density apartment buildings would be a total destruction of their community on numerous levels**.

Lots 9 & 10 are **directly across from an elementary school** (K-8) which currently is at capacity. It also sits on a **rural two-lane road** which has **numerous accidents.** It is also **served by the county sheriff's office** and has had **problems with response times in emergency situation**s. This site also sits almost adjacent to the local creek (Dry Creek) which has had flooding issues but runoff from the **additional paving required by an apartment complex could pose toxic runoff problems into said creek**. The additional **traffic congestion** caused by this development on that **two-lane road would be detrimental to land owners farther up the road**.

It needs to be stated that most of these area properties the County has specifically pursued—not a developer pursuing the County for a rezone.

As you should be able to see, **the overall DEIR submitted by Placer County is flawed on multiple counts and needs to be sent back for further review of individual sites.**

Richard Burtzlaff
District 1 homeowner
3275 Almond Blossom Ln
916-990-4394
Pm95660@yahoo.com

LETTER 87: RICHARD BURTZLAFF

Response to Comment 87-1

Please see Responses to Comment Letter 76.

Letter 88

March 17, 2024

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr.
Auburn, CA 95603

To: Placer County Board of Supervisors, Placer County Planning Commission
SupervisorGore@Placer.CA.Gov; LandonWolf@Placer.CA.Gov; rdahlgren@placer.ca.gov; kkedinge@placer.ca.gov; cdraecs@placer.ca.gov; BoardClerk@placer.ca.gov

RE: Housing Needs Rezone Program

88-1 I would like to express my objection to the proposed rezone projects in the Dry Creek area. The impact of this RM30 rezone proposal to allow high density, low to very low income housing to be developed in Dry Creek would be a huge blow to our community's long established rural lifestyle.

88-2 The County should have required the developers of housing projects in our surrounding area to include low income housing in their plans, but they didn't. The County allowed them to mitigate their responsibility to include low income housing and now they are trying to make us pay the price for their mistakes. The Planning Commission has approached homeowners and asked them to allow their property to be rezoned as RM30. But it should not be up to individual homeowners alone to decide for the entire community if high rise, multi-family, low to very low income housing should be built in Dry Creek.

88-3 **Housing Developments:** There are already several sites recently built or scheduled for large scale housing projects in our immediate area (Brady Vineyards 118 single family homes, Whispering Creek 19 single family homes, Cabral Ranch 12 single family homes, The Ranch 485 single family homes, Double-S Ranch 36 single family homes, Morgan Creek II 79 single family homes, PFE Ranch 10 single family homes, Creekview Ranch 650 single family homes). Those are just a few built or under review, but there are many more that we've seen signs crop up stating that the property is planned for future development throughout Dry Creek. Did any of these developments include the required 10% low income housing or did they pay to get out of it? Yes, you say they can escape building their 10% low income housing if less than 100 homes are being built, but many of these small developments are all under one parent developer who should be held to the cumulative number of homes they are building in our area and required to build in 10% based on that figure (for instance, Morgan Ranch and Whispering Creek are both by Towne Homes). Otherwise, they can continually skirt their 10% requirement by building less than 100 homes in each development. Allowing ADUs to be built in these newer developments to qualify as low income housing is ridiculous. Many times it's just surplus housing for visiting friends and family, or maybe temporary living quarters for an

88-3 con't

aging parent or a college student that isn't going to be continually occupied and not really a benefit to the low income population you are trying to address. But, builders are more amenable to satisfying their 10% requirement that way because they can then sell those properties for even more, and much more than they could a low income apartment building.

88-4

We used to love seeing a family of deer that came every night to feed on the mulberry trees in our yard, but Whispering Creek built a 6' fence all along the back of our 3 acre property. Now when we look out our back patio, all we see is a tall, solid wooden fence, but for years we had an unobstructed view all the way down to the creek. That land was not supposed to be built on because it was in the flood plan, but the County found a way to allow a developer to build 19 houses right up next to us. All of the animals have disappeared with the many developments going in around Dry Creek and it has been destructive to their lives and habitat as well.

88-5

Importance of Choice: Building high density apartments in our rural area is not the same as building them in planned communities. For one, people who buy a home in a planned community get to see what they plan to build next to them. They can CHOOSE to live next to apartments if they want, or they can CHOOSE to live elsewhere. Apartments located in a large housing development would not impact other residents like it would us. It would just be more housing in their area. But *we* can't just CHOOSE to live elsewhere. These are our homes that we have built our lifestyle around over the years. We can't just sell our house or pick up and move because we don't like our new living situation next to apartments. We have livestock and businesses to support. Building apartments in our rural area where homes and property have been established for decades is unfair. We didn't CHOOSE to live next to apartments and now you are trying to take away our CHOICE to live in the country where there are no apartments or high rise buildings! Building apartments next to rural homes with acreage that could have livestock and farm animals like horses, chickens, goats, cows, sheep, dog kennels, horticulture and a variety of businesses is a lot different than just building an apartment next to some similar urban housing that is compatibly zoned. How long do you think it would be before those new apartment dwellers complain about the animal noise or smells from our country properties that they are built next to? In their minds, we would be the problem, not them.

We've all worked hard to be able to afford to live here. Some have lived here for decades and some have made the conscious choice to join our community more recently. But they made that CHOICE based on knowing what our community was like – low density, rural, close knit like-minded people who value their privacy and security away from the crime and noise of crowded urban living. Our kids can safely play outside in our yards without fear of someone driving by and kidnapping them. For the most part, (at least for now) we have larger than normal lots and acreage with a low density population, seclusion from a high concentration of traffic and a very stable, dependable community, not at all like the transient residents of apartments. This won't just be affordable housing for Roseville/Placer people. It will draw interest from surrounding areas like Antelope, Elverta, Rio Linda, Lincoln etc. Low income apartment dwellers will choose to live here simply because it's affordable, not because they want to be a part of the community. They are renters and have no real ownership of their living

88-5 con't

situation, so unfortunately what looks nice and new and pretty in the beginning will quickly turn to into ugly disrepair, abandoned vehicles, and loud music, etc. Owners and managers of apartment buildings will change over time and there's no guarantee how well those properties will be maintained. Many times it's an absentee owner who has no idea what condition the property is in or property managers who have no interest in actively maintaining their upkeep.

88-6

Infrastructure: Public services and infrastructure are used more often by residents of high density, low income developments. Law enforcement is called more frequently by low income renters for domestic violence, but we do not have adequate services to handle these complaints. Dry Creek does not have the city services or resources to accommodate the increased demand for this many residents. Dry Creek relies on a Placer County Sheriff assigned to all of Dry Creek and West Placer. CHP and the Fire Dept. are also spread thin in our end of the County. Typically, urban areas have high density buildings and tend to be more walkable, with greater public transportation, while rural areas have low density housing. There is no employment opportunity here or public transportation available to look for jobs. There are no grocery stores, medical clinics, or much of anything other than a school and a small fire house along with semi-rural housing and homes with acreage. Residents of high density, low income housing depend more on walking and public transit. We have no bus service, no sidewalks, or street lights. The shoulder is a narrow drainage ditch. There is nothing to entertain the youth here, so there will be a much greater level of loitering and trespassing on our properties, and an increase of burglary, drugs and crime that we currently do not have much of a problem with, and we won't have the resources to respond to. High rise apartments, whether they are low income rental units or sold as high priced luxury condos, would seriously affect our community resources and our way of life and they do not belong in the country.

88-7

Water: There are serious drainage issues that would negatively affect surrounding property owners if this high density housing were to be developed. All of the proposed sites are bordered by residents with acreage that have lived here for decades. The water quality and quantity of our wells would be compromised or even contaminated, as well as the disruption of historic drainage routes needed to filter rain runoff and allow groundwater to recharge. All this concrete and asphalt covering the open ground that would normally help capture rain to feed our underground water for our wells will be destroyed. We've heard that it takes 23 inches of rain to refill the underground river by 1". With all of the available land covered up, it will be harder and harder for that recharge to occur. None of us want to deal with dried up or contaminated wells, or the cost of increased runoff or flooding on our property once the natural drainage routes are altered by your projects, nor can we afford to hook-up to city water just because you want to build high rise apartments.

Many of the homeowners near these proposed project sites have lived there for years. They grew up here and some have younger generations that have taken over. These are not McMansions. Most are modest homes and may very well qualify under your definition of low to very low or fixed income. These people can't afford to pay for hook-up to city water services, let alone pay the monthly bill. The California American Water Company is a very high priced

88-7 con't

water service and it tastes terrible. They can't afford to fix the damage you will do to the drainage on their property or the problems you will cause with their wells. If they can't afford to repair damage done to their wells or irrigation they will be forced to sell their property. In many cases you'd be forcing out current residents who are in fact low income, which makes no sense.

88-8

Traffic: The proposed 9-10 site is located directly across the street from the entrance to the K-8 Creekview Ranch School on Cook Riolo Rd. The school was not designed to accommodate the high number of vehicles attempting to access the school daily. This causes traffic to back-up in both directions on Cook Riolo from Vineyard to PFE at least twice a day, and more when there are after school events. Current residents who live along this road experience frustration because they have difficulty entering or exiting their homes due to the standing traffic. Construction vehicle traffic and future residents would create a serious conflict with the existing traffic pattern and congestion already under strain from parents dropping off/picking up their children at the school. Adding a few hundred cars from an apartment building at the greatest point of traffic congestion would be disastrous. There have been 4 fatalities in the past year on our roads (one was a pedestrian hit and run less than a month ago).

Cook Riolo is a two lane road that functions as a main connection between West Roseville and Antelope. Once the over 500 single family homes being developed on Vineyard are completed, and the 650 homes on PFE along with the other nearby housing projects slated to be built in our area are done, there will be even more traffic on Cook Riolo Rd. The Roseville Corporate yard is located on PFE and their many vehicles travel down Cook Riolo throughout the day. Add hundreds of cars from these apartment projects and Cook Riolo Rd will be overwhelmed. Dry Creek roads can't support more urban housing and the hundreds of residents, cars and traffic these newly proposed high density, multi-family developments will bring, and we don't want multi-lane roads and sidewalks in our rural community. Current residents ride horses and bicycles on our streets, but increasing the traffic will make this all but impossible.

88-9

School: There will also be even more students attending the Creekview Ranch School overburdening our classrooms, and more cars will be added to the already stagnated traffic on Cook Riolo. There's already way too much traffic on this small road to even think about adding hundreds of cars daily from apartments that would directly feed onto Cook Riolo. The crosswalk to the school is in close proximity to the where the entry/exit from the apartments would be located. Given the accidents and fatalities that have occurred on our roads recently, it's a valid concern that the safety of children walking to and from school would be in jeopardy from all of the increased traffic. Apartments tend to have a more fluid tenant population. Only the person listed on the lease is background checked. Anyone else who moves in or visits is not background checked so we are potentially allowing pedophiles, other criminals and drugs to be in close proximity to a school with kids as young as 5 years old.

With all of the school shootings, child abductions, sexual predators, domestic violence, drugs and serial killers these days, do you really think it's wise to locate high rise apartments housing

88-9 con't

200-300 or more low income residents directly across the street from a K-8 school? Apartments, because of their rental nature, have a revolving door of residents. We feel our kids are relatively safe at Creekview Ranch School located in our rural area, but not if there's apartments looming over it. We feel safe leaving our windows and curtains open, but not if there's hundreds of residents basically right next door possibly looking in or lurking on our property. Generally, apartments are hot spots for crime and mayhem that radiates approximately 1 mile in every direction from the building. Years ago, our previous house bordered the elementary school and teenagers would drive their vehicles up on the blacktop to play basketball with music blaring and yelling and screaming until late at night when the cops had to be called to make them disburse. I can't imagine the loitering and destruction of school property that will occur when kids are bored after school or during summer break.

The quality of education could be impacted by overcrowding as a result of all the new students from these apartments. School transportation has also been an issue. Dry Creek school district is one of the few in the area that has bussing and if they are unable to meet the demand of 800 new apartment units they may discontinue bussing all together.

88-10

Quality of Life: These high-rise, high density developments would all cause considerable and permanent light pollution from apartment windows and the all night parking lot lights. There would be a definite increase in noise from building construction and the hundreds of future resident cars coming and going 24-7, as well as the general collective noise from people living in a concentrated area. All of this makes a big difference in a quiet, country neighborhood where low light and noise has been appreciated for decades. These developments would adversely affect the quality of life and property values for homeowners who live near the projects and who moved to the area for its rural ambience.

There are many questions that have not been addressed, like where will these apartment residents park if they do not have an assigned park space and their parking lot is full? Will they park their cars on our narrow rural streets or in the school parking lot? Where will their visitors park when there are no spaces available? What happens when these very low rent resident's cars break down and they can't afford to fix them? Do they just sit there when they move out? What happens when they can no longer afford to pay the rent, do they move out and live by the creek and increase the growing homeless population there? What's to prevent the County from turning these properties into housing for the homeless? My daughter just purchased a home in the new Mason Trails development in Roseville and they are having trouble with gangs of cars (sideshows) turning loud, screeching donuts at the wide entrance of the development on PFE every night. They are coming from an old run down house on PFE across the street from Mason Trails. They have raging out of control parties with hundreds of cars parked on the grass every weekend. These are just some of the types of things we fear we may experience with very low income renters in these affordable housing projects. We have a quiet, peaceful community that you would destroy if you build apartments on top of us.

88-11

Dry Creek Community Plan: The County created the Dry Creek/West Placer Community Plan in cooperation with Dry Creek residents, and potential developers. Once adopted, it was expected that only compliant, ***compatible*** "rural infill" housing would be constructed that would not ruin the area's rural character, affect its riparian corridor, disrupt drainage routes, or compromise our wells. The Plan's goals, policies and guidelines were carefully framed and aligned with not only our rural community's needs, but with the requirements of CEQA (California Environmental Quality Act), Water Resources Board regulations, the shared vital interests of neighboring jurisdictions (Re: ground water recharge, traffic, and flood control), Fish and Game efforts to enhance the creek and riparian corridor, SACOG/ Regional Transportation plans & Regional Trails plans, etc. The Plan provided our community and the County representatives with specific parameters to guide development. *An important component of the plan was the adopted zoning of 1 home/acre north of the creek.*

Based upon the Community Plan, Dry Creek residents have invested in improving the value of their homes, property and our rural community. They have chosen to make this their home because they welcome the escape from crowded urban living and they enjoy its rural nature. Multi-story, multi-unit, multi-family, mixed-use and live/work apartment complexes cannot magically be made inconspicuous or compatible with our existing rural homes and acreage properties, **nor can it be seen as desired rural infill housing**. High rise, multi-family housing would destroy this community and the security and sanctity of our rural lifestyle. We want Dry Creek to remain the rural oasis *near* the city, but not *in* the city, and not with apartments. High rise apartments are NOT compatible housing in our rural area.

Our rural community should not be responsible for meeting the County's last minute push to find affordable housing sites. It has come to light that the State does not require a 10% number of low-income housing elements. This requirement is something the County came up with to meet their own Regional Housing Needs Assessment (RHNA). Based on this, we're not sure where this looming deadline of May 15, 2024 is coming from. Sounds like this is a movable date which would give the County as much time as it needs to research and select better sites for these projects. This should have been done years ago when all of these sprawling housing developments were approved. That's where this type of housing belongs, not in the country. Apartments do not fit in with our rural landscape. This high density proposal is not needed in Dry Creek and it will negatively affect our small rural community and our property values.

88-12

What the County Can Do: Placer County has the ability to meet the requirements for low income housing by designating sites within existing city development. Right now, you are looking to rezone properties to RM30 so that in the future (could be years from now) when those land owners decide to sell, a developer will build (hopefully, but there's no guarantee) low income housing. If you can count possible future development, no matter how far in the future it might be, as satisfying your 10% low income requirement, why can't you just assign the same number of low income units to these future developments we see posted everywhere and count those the same way? Obviously they have not been approved yet, and may not have even reached the permit application stage, but you could say and **enforce** that they will

88-12 con't

build the required number of units – even if it isn't 10%. Spread it out among developers and have them build a few affordable duplexes scattered throughout each of their many developments. That way it doesn't create such an undesirable concentrated collection of low income renters or giant behemoth low rent buildings. I realize all low income renters are not undesirable, but the higher the concentration in one location the more it creates a greater collection of problems across the board. Go back to those developers whose projects have not yet been approved and tell them they have to allow high density housing. Let them figure it out. They are making money hand over fist on these developments and you are trying to screw us out of our legacy properties by ruining our community. It's not fair that you are trying to stick us with something they should have done. Placer needs to change the option for developers to weasel out of their 10% low income requirement so this problem doesn't continue to happen. *Placing the higher density housing projects near similar high density urban zoning makes more sense.* Locating the rezone projects near services or resources low income residents might need and could gain access to more easily would better serve the occupants.

There's a ton of open land on Dyer just past the bridge on Watt. Maybe you should ask those property owners if they will allow you to rezone their property! Maybe a developer has already bought that land – make them put in affordable housing! You are planning to widen Watt Ave from Baseline to PFE at some point anyway, so why not put these projects in an area planned to have grocery, shopping and bus lines available? Why are you trying to stick these projects on little country roads that already have way too much traffic? Why do you feel you need to "equally distribute" these sites among all of the districts? If there are not suitable sites in a specific district, you shouldn't be forcing them to be located there.

Do better planning now and in the future! There are actually suitable sites within the large housing tracks that are being planned now, and that's where these should be located. Looking for, in your opinion, small "underutilized" sites in our rural area is just opportunistic. It appears that you are afraid to enforce the affordable housing requirement on builders and maybe you prefer the political support and money from them to fund other projects. You are elected officials who are supposed to be working for our best interests, not the builders. Yes, affordable housing is needed and in the interest of low income residents, but not in the middle of rural properties or where they are not best served with community amenities. This rezone project is definitely not in the best interest of Dry Creek residents. We do not support this in our community for all the many reasons stated above. It feels like you think it's easier to just screw us and we can't do anything about it rather than making a concerted effort to find *compatible, responsibly zoned locations.* There is widespread anger and opposition to this ridiculous rezone proposal and the sites you've chosen.

88-13

Summary: The Dry Creek community consists of lower-density rural-residential development, grazing fields, natural woodland and open wetlands. It is not the appropriate place for high rise apartments. There's a reason we all chose the security of living in a rural area, and one of them is the safety of low density, and now you want to take that away from us. Increased crime and lower property value is of great concern. Why should we lose the value of our homes that

88-13 con't

we have spent years improving and tending just because you want to bring in lower quality housing? That wasn't what we bought in to. We moved here to escape crowded city living, but Placer County continues to insist on bringing the city to rural Dry Creek. We don't want wider streets, sidewalks, street lights, stop lights or public transit. It was originally supposed to be 1-2 acre minimum lots but you keep whittling our community down with smaller lots in these huge housing developments bringing in more and more people and you are swallowing up our open spaces and crowding us out. If these apartment projects were built, coupled with all of the other housing projects that are planned, our school would be overburdened, water drainage would be an important issue, the ability to maintain and replenish our well water would be under attack, and the safety and toll on our small two-lane roads with all the increased traffic would be of high concern, along with the needed infrastructure which is already under strain to service the current existing community. This is the country and we want to keep it that way.

This rezone decision should have been presented to the community as a whole, not just the very, very, very few houses that were notified. We all have acreage - how many houses do you think are in your required 300 ft. notification proximity? That may be a good measurement for urban housing, but here it means maybe 3 or 4 people at each site were notified. Or maybe that's what you were hoping for – to slip this in under the radar and we wouldn't find out until it was too late. This is wrong on so many levels. Please don't make this our problem, it's yours, and it's yours to fix with an acceptable solution that serves the County as well as Roseville and Dry Creek residents.

We ask Placer County to uphold the Dry Creek Community Plan to accommodate ***compatible rural infill projects*** for build out in our area. We respectfully request that the Planning Commission select sites that will complement neighboring design goals and meet the needs of those future residents. We request Dry Creek be excluded and exempt from the rezoning project which would be extremely detrimental to this small rural country neighborhood.

Sincerely,

Terri Burtzlaff
3275 Almond Blossom Ln
Roseville, CA 95747
tskondin@yahoo.com

LETTER 88: TERRI BURTZLAFF

Response to Comment 88-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 88-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 88-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 88-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 88-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 88-6
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. Potential impacts related to publics services are addressed in Section XV, Public Services, of the Initial Study, as well as in Chapter 10, Fire Protection and Wildfire, of the Draft EIR. The services available for each site are also detailed on the Site Inventory Forms located in Appendix C of the Draft EIR.

Response to Comment 88-7
As discussed in Section X, Hydrology and Water Quality, of the Initial Study, pursuant to Mitigation Measure X-1, all projects would be required to submit a Drainage Report to identify how a project may impact drainage and mechanisms to ensure a project does not result in a change to stormwater flows. Evidence has not been presented that development of the rezone sites would contaminate or "dry up" local wells and groundwater. The Initial Study concluded that impacts to ground water supplies or ground water recharge were less than significant and mitigation measures are not required.

Response to Comment 88-8
Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 88-9
Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 6 – Impacts to Local Schools.

Response to Comment 88-10

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 88-11

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. Future development applications on any of the rezone sites will be reviewed for compliance with applicable community plan guidelines. In addition, future development within the RM30 zone district would be subject to the development standards and design guidelines established in the County's Multifamily and Mixed Use Design Manual. The County's purpose in developing the Manual was to provide a better framework for the design of future housing development and the permit approval process, ensuring a good fit for multifamily and mixed use projects within existing communities in unincorporated areas of the County. The development standards and design guidelines included in the Design Manual are intended to address private development and its relationship to neighboring properties and to the public realm.

Response to Comment 88-12

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 88-13

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 89

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:12:23 AM

From: terri <tskondin@yahoo.com>
Sent: Friday, March 8, 2024 3:20 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

To: Kally Kedinger kkedinge@placer.ca.gov

Jess Negrete jess.negrete@hcd.ca.gov

Subject: **COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT**

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

89-1

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

3) The criteria that the county used to seek out sites for rezoning were relatively

89-1 cont.

random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be less than 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public or local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that are actually viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Terri Burtzlaff

tskondin@yahoo.com

LETTER 89: TERRI BURTLAFF

Response to Comment 89-1

Please see Responses to Comment Letter 62.

Letter 90

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to the rezoning for low income housing development in District 1
Date: Monday, March 11, 2024 11:04:01 AM
Attachments: Outlook-02yh2ejg.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 11, 2024 10:07 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to the rezoning for low income housing development in District 1

To add to the record

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Saturday, March 9, 2024 2:28 PM
To: Myron Butler <mbutler@fundandlend.com>
Subject: Re: Opposition to the rezoning for low income housing development in District 1

Thank you for your email. I too like in Morgan Creek. Please join us in person to discuss this meeting at the West Placer MAC meeting on March 20th to have your voice heard.

PS The parcels you mention below belong to the City of Roseville. We are only tasks with rezoning District 1 in unincorporated Placer County.

Feel free to call me if you have any questions.

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Myron Butler <mbutler@fundandlend.com>
Sent: Saturday, March 9, 2024 1:16 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>
Cc: alicia.butler05@gmail.com <alicia.butler05@gmail.com>
Subject: Opposition to the rezoning for low income housing development in District 1

Good afternoon

I am reaching out to contact you regarding the county proposal for multiple property rezonings to high density low income apartment housing in our rural dry creek community. My wife and I purchased our home brand new in 2004 when it was built in the Morgan Green/Creek community. The idea of having low income apartment housing (especially sites 9 & 10) smashed right in between homes that were built and purchased for the purpose of trying to establish (even if it's a small percentage) some type of generational wealth for our families. It's a travesty what's happening in our country as it pertains to the homeless, and low income numbers continually rising, which has a heavy impact on literally where these folks can live. Squeezing low income housing right in the middle of homes that are literally selling for $800k - $1.8M is absurd. Other communities of this stature don't have low income housing smashed in the middle of homes that sell for these numbers. It feels like there's an intention to destroy (for good) any potential equity that folks have built up for these last 20 years. Crime, noise, traffic on a small street (Cook Riolo) will be heavily impacted to the point where the country feel located right in the middle of the city will diminish. Next will be the desire for folks to live in this area. Please relocate this rezoning for a better suited area in Roseville. We've seen two buildings arise in Old Roseville that seem to be perfect areas. There's no bus line nearby (sites 9 & 10) without having to take a dangerous walk on Vineyard to get to Foothills Blvd where one can catch the bus. This is a small nice community that does NOT need to see a negative impact such as this. I'm a real estate broker of 24 years in the business and this would not fair well for those that purchased long ago and those that will purchase in this area in the future with the

90-1

90-1 ↑ cont.

new developments of single family homes being built in the area.

Myron Butler
The Funding & Lending Network
Broker
916-871-5573 ph
916-760-1825 fx
Lic#01403586
mbutler@fundandlend.com
www.greatersacramentohome.com

CONFIDENTIALITY NOTICE: This email message, including attachments, is for the sole use of the intended receipient(s) and may contain confidential and privileged information. If you are not the intended recipient, you may not use, disclose, copy, or disseminate this information. Please contact the sender by email immediately and destroy all copies of the original message including all attachments. Your cooperation is greatly appreciated.

LETTER 90: MYRON BUTLER

Response to Comment 90-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 91

From: Board Clerk
To: Karen Calkins; Kally Kedinger-Cecil; Supervisor Gore; Placer County Environmental Coordination Services
Cc: Duane Calkins
Subject: RE: Opposition to Proposed Rezoning On/Near East Drive - Roseville (Rural Dry Creek)
Date: Tuesday, February 13, 2024 12:13:30 PM
Attachments: image001.png

Good afternoon, Karen – My apologies that you did not receive confirmation of receipt of your previous comments. Your comments have been received, provided to Supervisors, and included in the Administrative February 13th Board meeting.

Thank you,

Megan Wood, Clerk of the Board
Placer County Board of Supervisors
175 Fulweiler Ave. Auburn CA 95603
530.886.4650 Office | 530.906.2945 Cell
mwood@placer.ca.gov

From: Karen Calkins <kmcalkins22@gmail.com>
Sent: Tuesday, February 13, 2024 11:37 AM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Supervisor Gore <SupervisorGore@placer.ca.gov>; Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>
Cc: Duane Calkins <docalkins@gmail.com>
Subject: Fwd: Opposition to Proposed Rezoning On/Near East Drive - Roseville (Rural Dry Creek)

Hello All -

91-1 Unsure if the following email reached you all last evening, so I'm resending. You can see the original time stamp of 11:25pm on February 12 (Monday). Apologies if you're reading this a second time. Thank you truly for reading.

Duane and Karen Calkins

Begin forwarded message:

From: Karen Calkins <kmcalkins22@gmail.com>
Subject: Opposition to Proposed Rezoning On/Near East Drive - Roseville (Rural Dry Creek)

Date: February 12, 2024 at 11:25:15 PM PST
To: boardclerk@placer.ca.gov, kkedinge@placer.ca.gov, supervisorgore@placer.ca.gov, cdraecs@placer.ca.gov
Cc: Duane Calkins <docalkins@gmail.com>

Dear Board of Supervisors, Project Planner Kedinger-Cecil, District 1 Supervisor Gore, and the EIR Team:

Thank you truly for taking the time to read this communication. Thank you also for the big work that each of you do to make Placer County a beautiful place to live and work.

91-2

In 1990, we used our savings as a young married couple to purchase a little house on an acre on Central Avenue in the rural Dry Creek area of Roseville where we still live. We spent our careers working for Placer County schools as educators and administrators, saved money by creating the additions to our home ourselves, raised our children, and continue to give back to the citizens - especially children - of Placer County. At the end of the day, we are grateful to be able to come home to our "house in the country."

We oppose the proposed rezoning on/near East Drive in Roseville (Rural Dry Creek) that will include high-density parcels/housing. Here are our oppositions and questions:

91-3

1. We were shocked to see a sign on the corner of East/Baseline on February 8 with a QR code and website. This notice is inadequate communication. Why didn't our rural community receive ongoing letters addressed to our homes far in advance?

91-4

2. The community of Dry Creek is rural, and each of us purchased our homes and land to live this way under the promise of the intended zoning. We love our quiet, rural, and country setting. Can you please help us keep it this way?

91-5

3. The rezoning in order to create high density housing will only create a myriad of challenges that neither the county nor the Dry Creek Community are able to support including traffic overload and damage to our rural area roads, light pollution, noise pollution, lack of services including law enforcement and fire as we depend on the Placer County Sheriff support and the volunteer Dry Creek Fire Department, school overcrowding, and increased crime. As it is, PG and E cannot sustain power here during storms, and we all depend on well water. Additionally, the property values of our homes and land will be markedly decreased with this rezoning. Can you study other areas for high density housing that are larger than our tiny Dry Creek Community?

91-6

4. We are stymied that any study of the land proposed for rezoning allows for anything other than the rural farming and wildlife land that it is. This land is

91-6 cont.

not "underutilized." Currently, the land holds vegetable and fruit crops, bee-keeping, livestock, and many homes for wildlife. The creek that runs across this property is home and sustenance for ducks, geese, frogs, deer, fish, coyote, foxes, raccoons, birds, and hawks. How on earth - literally - does the environmental impact report permit destroying this land and creek?

91-7

We are devastated and heartbroken to know that rezoning to permit high density housing is being considered. We will do anything to help our hard-working leaders look for alternative sites and support housing needs in a myriad of other ways. Thank you for taking the time to read this communication and for your support of our rural and hard-working community who wants to come home at the end of the day to peace - in our little piece of the country.

Sincerely,

Duane and Karen Calkins
Roseville, CA

LETTER 91: DUANE CALKINS AND KAREN CALKINS

Response to Comment 91-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 91-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 91-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 91-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 91-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 91-6
Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 59-2 regarding creek concerns.

Response to Comment 91-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 92

From: jkcaraway
To: Placer County Environmental Coordination Services
Subject: Property #26 at 8989 Auburn Folsom Road
Date: Thursday, March 7, 2024 12:13:09 PM

Hello,

92-1 I am writing to request that property #26 at 8989 Auburn Folsom Road be removed from the list of properties considered for re-zoning into high density housing.

92-2 I understand the proper environmental reports are not being done, and high density housing will put too much of a strain on Auburn Folsom Blvd.

Thank you,
Jaynnie Caraway

LETTER 92: JAYNNIE CARAWAY

Response to Comment 92-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 92-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 93

From: Jo Anne Carmona
To: Christopher Pahule; Placer County Environmental Coordination Services; Supervisor Gore; Shanti Landon; Suzanne Jones; Cindy Gustafson
Subject: RE RHNA Mandates
Date: Monday, February 12, 2024 7:28:58 PM

93-1

These RHNA mandates are not justified in verifiable need; and these numbers are doubled for the actual need.

https://voiceofoc.org/2022/04/california-state-auditor-releases-scathing-report-on-rhna-process-report-finds-housing-goals-are-not-supported-by-evidence/

LETTER 93: JO ANNE CARMONA

Response to Comment 93-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 94

Subject: Opposition Letter to Placer County's Housing Element Sites Rezone Proposal

Date: March 13, 2024

To Placer County Staff, Placer County Governing Body and the State of California:

My letter below is my opposition statement regarding the Placer County's Housing Element Sites Rezone Proposal for District 1.

Per Gov. Code Section 65584(d)(2), the regional housing needs allocation plan shall further all the following objectives: Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the regions greenhouse gas reductions targets provided by the State Air Resource Board pursuant to Section 65080.

By definition infill development refers to the construction of buildings or other facilities on previously unused or underutilized land located within an existing urban-or otherwise developed area. Infill development often works in concert with urban growth boundaries, which designate the limits of growth for urban areas and protect undeveloped land on the periphery of the city. As taken directly from California Department of Housing and Community Development's (HCD) website titled, Regional Housing Needs Allocation (RHNA), the Housing Element Sites Rezone Proposal of properties 7, 8, 9, and 10 within District 1 are in direct violation of the California's Government Code Section 65584(d)(2) and the definition of infill development. The above referenced properties are not part of an existing urban development and are part of Placer County's agricultural resources. It is the job of Placer County's government to protect this undeveloped land per California Law. Furthermore, per HCD's website, Opportunities for Energy Conservation | California Department of Housing and Community Development, "according to the Urban Land Institute publication *Growing Cooler*, "conserving or developing infill housing within a more urban core has been shown to reduce primary energy consumption an average of 20 percent per household over newer sprawl developments."

94-1

It is apparent that the staff of Placer County who composed the Housing Element Sites Rezone Proposal, did not do the analysis needed in order to be compliant with the State's standards for RHNA. Government Code Section 65584(d) was only referenced twice in the proposal and did not thoroughly explain the statutory objectives set out in this piece of California Law.
Due to the poor planning of Placer County, rezoning is being proposed and forced upon its residents without thorough analysis and research. The purpose of the RHNA program set out by the State of California is to ensure sites are zoned to allow owner-occupied and rental multifamily residential uses "by-right" (only subject to ministerial approval) in which 20 percent or more of the units are affordable to lower income households. In no place within HCD's website does it indicate that governments should rezone land to meet this need. It is intended that properly zoned land be used for RHNA. Per HCD's webpage, Program Overview and Quantified Objectives | California Department of Housing and Community Development, Placer County should have identified adequate sites, with appropriate zoning and development standards and services to accommodate the locality's share of the regional housing needs for each income level. HCD has requested that over zoning be done in order to meet RHNA. Placer county should have created a surplus of land for residential development during land planning of at

least 20 percent more than the locality's share of the regional housing need. Placer County has failed to meet these standards by their proposal.

Properties 7, 8, 9, and 10 within District 1 are located in a rural area on the periphery of Placer County. This community known as Dry Creek was developed so that properties were at a minimum of 2-acre plots. Dry Creek land currently houses generational families, livestock, and agriculture. Introducing high-density house will remove this landscape and environment that could potentially cause major issues to the ecosystem.

94-1 cont.

The Dry Creek community does not have the infrastructure to support Placer County's proposal. The roads which the proposed high-density housing is one lane with no sidewalks and have minimal stop signs and most with no street lights or traffic lights. The water supply and sewage systems are not running in those areas causing undue repercussions for the community. There is no reference of increasing needs for staffing in regards to Roseville Electric, the City of Roseville, and Roseville Police Department that would be needed to develop and support this proposal. Additionally, the school districts of Dry Creek Joint Elementary School District, Roseville City Elementary School District and Roseville Joint Union High School District do not have the ability to support an increase in student population. Newly developed neighborhoods in West Roseville and Dry Creek Community have redrawn school assignment lines so that students from those communities are going to Sacramento County's school District, Center Unified.

While I understand the need for affordable housing in Placer County, the Housing Element Sites Rezone Proposal does not meet the State's standards and is in direct violation of California Law. I request that the governing body of Placer County consider alternative solutions. Thank you for your time and consideration of my substantiated information. I look forward to your response and to a resolution that respects the interests of all stakeholders.

Sincerely,

Katharine Carpenter
kcarpenter0022@gmail.com
916-947-5113

LETTER 94: KATHARINE CARPENTER

Response to Comment 94-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, and Master Response 6 – Impacts to Local Schools. Regarding sewage concerns, please see Response to Comment 81-3.

Letter 95

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Traffic on New Airport
Date: Tuesday, February 20, 2024 9:16:20 AM

-----Original Message-----
From: Donna Carver <dcarver10@icloud.com>
Sent: Saturday, February 10, 2024 9:44 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Traffic on New Airport

95-1 An issue that has not been mentioned on any of the posts on Facebook is traffic. New Airport already has traffic problems. People use it as a raceway, and many people run the one stop sign. The county really needs to think hard about the traffic nightmare this project will cause.
Sent from my iPad

LETTER 95: DONNA CARVER

Response to Comment 95-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 96

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: VLIH/Homeless Housing
Date: Tuesday, February 20, 2024 9:15:40 AM

From: Donna Carver <dcarver10@icloud.com>
Sent: Friday, February 9, 2024 1:21 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: VLIH/Homeless Housing

96-1

I have lived in Auburn since 2003 and what was once a peaceful community where I intended to live out my retirement, is now becoming a crime ridden town that I am too scared to go out in alone. The crime rate in Auburn has increased exponentially since all of the low income housing and homeless shelters have been built. Auburn is now rated at only 21% safer than similar neighborhoods. Our home has already been broken into and many of our irreplaceable belongings stolen. I fear adding low income housing will only invite more crime and danger to our already suffering community. Even the chance to sell and remove ourselves from the increasing danger is becoming less realistic as our home values plummet with the undesirable living standards around us. Please consider another location for this new development and help ease the ever increasing burden on us. Please do not build VLIN/homeless housing in our neighborhood.

LETTER 96: DONNA CARVER

Response to Comment 96-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 97

From: Jessica Lang
To: Placer County Environmental Coordination Services
Subject: Opposition to Project 26 at 8989 Auburn Folsom Rd
Date: Thursday, March 7, 2024 3:31:05 PM

To whom it may concern:

I am writing to express opposition to the development planned at 8989 Auburn Folsom Road, (Project 26), in Granite Bay.

My name is Jessica Lang Casares and I have been a resident of Granite Bay for over 10 years, alongside my husband and our four children. I have a number of other family members who have lived in the Granite Bay community for over 20 years, to include parents, aunts, uncles and younger cousins who attended Oakhills, Cavitt and Granite Bay High School. Over the years, we have enjoyed this area for its natural beauty, outdoor opportunities and small-town feel. We love all the amenities, and yet admire its unique charm.

97-1

The purpose of this letter is to inform you that we have a concern with the proposed 510 unit housing on Auburn-Folsom. We have seen an increase in traffic over the years and feel there's a valid concern for an increase in further traffic, and a potential of accidents, etc. Our three youngest children attend Oakhills and Ridgeview currently and our oldest of four children is currently attending Cavitt Junior High. He has a number of friends who walk or ride their bicycle to and from school. We strongly feel that with an added number residents to this area, it would significantly increased risk for not only the children, but other citizens of the community as well.

Furthermore, the proposed low or very low income housing, could also have a significant impact of those in this area, including the safety of our children in this proximity. We feel strongly that this could be due to the possible risk increase of crime and other non favored activity to the betterment of the community. It would be a determinant to lose what has become such a wonderful place to raise a family and reside. Safety should be a leading concern for all and not overlooked, especially when we have such a large number of children already on foot and bikes on small paved street areas as it is currently. There is even a current section where the children have to cross half way across the street and stand there with traffic zooming next to them, in order to cross to the other side, in order to get to Cavitt Jr. High.

We kindly ask that you help advocate for the safety of our community as a whole, and for the children who are and will be attending our schools, most specifically, Cavitt, Junior, High. We appreciate all of your efforts and attention to this topic.

Sincerely,
Jessica Lang Casares
916-847-4812
Jessicalangcasares@gmail.com

LETTER 97: JESSICA LANG CASARES

Response to Comment 97-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 98

From: Richie Chan
To: Placer County Environmental Coordination Services
Subject: Property #26 and #25 comments
Date: Thursday, March 14, 2024 8:24:30 PM

Hi,
I understand it's inevitable to develop the unused land for low to very low income housing, referring to:

- Property #26, address 8989 Auburn Folsom Road.
- Property #25, address 8950 Auburn Folsom Road.

98-1

But as I watched your recordings in video during your public hearing in Feb 2024, and after doing some research regarding other low income housing, I believe you might just need to bring Placer County residents (in particular Granite Bay residents) along your journey where you explain how will you possibly manage the property in the future.

I have seen other low income properties being developed, and it's like a rental apartments with management office that help to sort and verify eligible families background before their stay in the apartments. Me and my family felt relief after seeing a couple of projects like these as we now understand how it's being managed. I even shared it with our children's family and neighbors in Granite Bay and they felt the same.

I believe it's information vs rumors playing the devils and would recommend you and your team doing more communication and education of what the property is, how it will be managed.

Thank you,
Richie

LETTER 98: RICHIE CHAN

Response to Comment 98-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 99

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Understanding Low to Very Low Income Family - Affordable
Date: Wednesday, March 6, 2024 3:22:55 PM

From: Richie Chan <ylrichiechan@gmail.com>
Sent: Wednesday, March 6, 2024 3:03 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Understanding Low to Very Low Income Family - Affordable

Hi Kally,
I was reading the housing needs for rezone and listening to planning commission meeting recordings, but still have some confusion perhaps you can help me understand below.

I am interested to learn more in District 4:

- Property #26, address 8989 Auburn Folsom Road.
- Property #25, address 8950 Auburn Folsom Road.

99-1 Given that you provided the comparison to another large project (Terracina at Whitney Ranch - Rocklin) as an example because the site at #26 is larger than 10 acres are not considered adequate to accommodate lower-income housing needs unless it can be demonstrated that sites of equivalent size were successful.

Can you let me know if the development at property #26 will be the same or similar to Terracina in Rocklin?
Will it be a rental apartments or it will be sold to prospective buyers (low to very low income families)?

I am a resident in Granite Bay and the above will help provide clarity. I believe a rental apartments with a site management team will greatly help with the coordination efforts to maintain a healthy community, but you may tell me otherwise.

Any information you can fill me in will be greatly appreciated, thank you.

Regards,
Richie

LETTER 99: RICHIE CHAN

Response to Comment 99-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 100

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Dry Creek Rezoning of sites 7-10
Date: Tuesday, March 19, 2024 10:56:45 AM
Attachments: Outlook-huzil5t4.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:07 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Dry Creek Rezoning of sites 7-10

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Angela Chang <angfabchang@gmail.com>
Sent: Tuesday, March 5, 2024 11:13 AM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Dry Creek Rezoning of sites 7-10

Dear Robyn Dahlgren,

100-1

My name is Angela Chang, and my family and I live on Misty Ln, off of Vineyard Rd.

Our little community has recently received notification that Dry Creek sites 7-10 are being considered for high density, low income apartments.

I cannot begin to tell you how much I do not agree with this, and that we plan on

100-1 cont.

fighting this. We are a community of farmers. We chose this area because of the quiet, remote feeling. We chose this area to raise our daughter, grow some food, take care of some animals, and live a quiet rural life with the conveniences of being close to modern day necessities.

100-2

The rural nature of our community unfortunately lends itself to homeless populations, reckless drivers, litterers, and other behaviors that disrupt our quiet living. Vineyard Rd. is already a raceway for most people; we have observed cars going over 60 mph on this road because it's empty and quiet. More traffic and people mean that my daughter and I cannot walk safely in our neighborhood. It means more trash. It means more crime. And none of those things are welcome here.

100-3

There are many other places you can put these apartments. Places near freeways, shopping centers, and other residences. This does NOT need to be here amongst agriculture workers, farmers, and ranchers. This is the most out of place location for this type of housing, and I am incredibly disappointed that our elected officials would even consider such a location.

Thank you.

Most Sincerely,

Angela Chang

Please know that I honor and respect boundaries around personal time, well-being, caretaking, and rest. If you receive this message while engaged in any of the above, please protect your time.

LETTER 100: ANGELA CHANG

Response to Comment 100-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 100-2
Please see Master Response 2 – Social and Economic Impacts and Master Response 4 – Traffic Safety.

Response to Comment 100-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 101

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning in North Auburn
Date: Tuesday, February 20, 2024 9:15:35 AM

From: linda Christensen <lindachristensen12@gmail.com>
Sent: Friday, February 9, 2024 12:55 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Board Clerk <BoardClerk@placer.ca.gov>
Subject: Rezoning in North Auburn

I am responding to the board of supervisors coming meeting to rezone parcels in North Auburn, namely parcel 74, located on Bell Rd.

First, I am not against low income housing but not on parcel 74. Why are you targeting North Auburn? The impact along Bell Rd and New Airport Rd will be devastating!. 101-1

We are a quiet country residential community of families and retired elderly of which I am a part of.

What are you calling low income? What is the criteria

Building 300 to 400 units in that location would be devastating for all residents along New Airport Road because even if you put exits out on Bell Road a good part of that traffic will cut off onto NewAirport road. This road is not suited for that kind of increased traffic either vehicle or pedestrian. We already have low income housing along this road and they walk down to the Bel Air shopping center and there are no sidewalks for them to walk on for safety and the road is very narrow. We already have too many accidents from careless drivers. 101-2

The building of 300 to 400 apartments means an increase of at least 300 to 400+ vehicles. If you believe they will take a bus you are wrong. Come and sit on New Airport Rd for a while and you will see the number of people walking along the road.

What about schools for the number of children that will be in those apartments? You closed Rock Creek School and now you want to increase the child population without nearby schools? This housing will bring in people from outside North Auburn so the population isn't going to be what it is now to just help our community and therefore we will need more schools to accommodate them. 101-3

Where are the jobs in North Auburn for this many people? I tried to get a job before Christmas to supplement my income and there were very few jobs available, most I didn't have the education for. This is not a place for people to find employment!! Again more vehicles and more traffic to get to jobs. 101-4

The crime rate will increase in North Auburn, wherever there are complexes like this crime increases. Are you going to increase the number of law enforcement to protect us? 101-5

I moved to this area to live a quiet retirement. Our neighborhoods in this area are full of families and retirees who just want a peaceful life but with this rezone our safety and way of life is being taken away.

As I stated before, I am not against low income housing but it needs to be where there are adequate jobs, schools, transportation and law enforcement not parcel 74. 101-6

101-6 cont. ↑

Just be considerate and realistic. Do any of you reside along Bell or New Airport Rd? If you do, you will understand the legitimate concerns we have.
Respectfully,
Linda Christensen

LETTER 101: LINDA CHRISTENSEN

Response to Comment 101-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 101-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 101-3
Please see Master Response 6 – Impacts to Local Schools.

Response to Comment 101-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 101-5
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 101-6
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 102

From: Jennifer Clarke
To: Placer County Environmental Coordination Services
Subject: Rezoning at Auburn Folsom Rd and Fuller near Eureka Rd.
Date: Thursday, March 14, 2024 12:41:04 PM

Hello,

102-1 My Family and I moved here from San Jose just over two years ago. We first purchased a home in Los Lagos as we wanted a safe neighborhood for our kids. After being here for two years we decided we wanted to build a custom home. When we found our land on Eureka and Purdy we knew it was perfect and very peaceful. We just finalized drawings on our new build (we paid top dollar for our 4 acres because we loved the neighborhood). To my surprise I left home and drove down Auburn Folsom and saw the rezoning sign. To say I was shocked was an understatement. I didn't just invest and plan to invest 3 million dollars to live 1 block away from 300 low income apartment units. Oh yes I sure did. My family moved from San Jose to get away from the homeless, the crime, and the overcrowded city. I saw first hand what low income housing did to our neighborhoods, schools and eventually our entire city.

102-2 To speak directly on how I feel this project will impact the immediate area, the traffic on Eureka , Douglas and Auburn Folsom during normal rush hour is already horrendous. I sometimes sit at the light on Eureka for 3 rounds . I don't know how throwing a 5 story apartment building there is going to impact this already massive back up of cars. As for property value decreasing because of the impact on schools, this will for sure happen. Our now 9,10 schools will be impacted massively by lower income families and lower test scores. I saw this with my own eyes happen in our once very nice Almaden neighborhood.

102-3 The schools went down after only 2-3 years from 9,10 down to 5,6 and 7's. This will lower home values as people move here for the schools. Granite bay is desirable because of it being an affluent area with good schools and low crimeand somewhat rural. This will change , I guarantee it.

102-4 I have decided to put a hold on my building plans until May because I will definitely sell and move out of Granite Bay if this zoning change gets approved. I sure hope others realize how badly this will impact their future home values , safety and education of their children.

Jennifer Clarke-Pena
BRE#01409067
Property Manager
Terracommercial Management Corp.
873 Blossom Hill Road
San Jose, CA 95123
408.947.1166/phone
408.621.0302/cell (text preferred)

LETTER 102: JENNIFER CLARKE-PENA

Response to Comment 102-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 102-2
Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 102-3
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 102-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 103

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Needs Rezone Auburn Folsom Road/Fuller near Cavitt
Date: Tuesday, February 20, 2024 9:23:28 AM

From: Jennifer Clarke <Jennifer@terracommercialmanagement.com>
Sent: Wednesday, February 14, 2024 10:07 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Housing Needs Rezone Auburn Folsom Road/Fuller near Cavitt

Hello,

103-1

I just purchased a house on Eureka Rd at Purdy and am in the planning stages of building my dream home. When the rezone sign went up last week I was shocked as I had never heard of this rezone deal. After countless hours of research I want to confirm my suspicion is correct. Yesterday the property remained on the list as one of the sites that will be rezoned and converted into 217 moderate low income housing units? The reason I ask this is because I am about to spend 1.5 more on a 1.4 million dollar (purchased for in May)property I thought held great value. I am a realtor and know my value will greatly depreciate with this news. I will IMMEDIATELY halt plans and sell if I am reading this correctly. I cant imagine anyone would bring low income housing to an affluent area ruining or schools and causing horrendous traffic. I am completely heartbroken as I moved here from San Jose two years ago to get out of what I hear they are bringing to our beautiful community. Any input would be greatly appreciated as my head is spinning from everything I am reading online.

Jennifer Clarke-Pena
BRE#01409067
Property Manager
Terracommercial Management Corp.
873 Blossom Hill Road
San Jose, CA 95123
408.947.1166/phone
408.621.0302/cell (text preferred)

LETTER 103: JENNIFER CLARKE-PENA

Response to Comment 103-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 104

From: Cindy Cloud
To: Placer County Environmental Coordination Services
Subject: No on Project 26 Development
Date: Thursday, March 7, 2024 2:41:41 PM

Hello,

104-1 I'm writing to beg that you do not develop this site at all, but surely not a high-density apartment building! I live on Auburn-Folsom Rd. and have seen how the increased traffic on this road has changed my ability to travel at certain time of the day, contributed to numerous accidents and fatalities and the general safety of pedestrians due to the amount of autos who drive well above the speed limit of an already high 55mph! If not for the impact to human beings, then most definitely do not develop it for the preservation of wildlife and their habitat.

104-2

Thank you

LETTER 104: CINDY CLOUD

Response to Comment 104-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 104-2

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 105

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Eileen Cook. I am a Placer County resident with an address

at 7111 Shoreside Ct., Granite Bay, CA.

105-1 In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

In addition, I am writing in support of the letter written by Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024. I respectfully request the Board consider the concerned expressed therein as an extension of my own opinion.

Thank you for your time,

Eileen Cook

LETTER 105: EILEEN COOK

Response to Comment 105-1

Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Responses to Comment Letter 162.

Letter 106

From: Brittney Martines-Copeland
To: Placer County Environmental Coordination Services
Subject: 3865 Old Auburn Road
Date: Monday, March 18, 2024 3:02:24 PM

Hello,

I am writing to bring to your attention a matter of concern regarding housing accessibility in our area, particularly in the Granite Bay community.

As an employee who commutes over 20 miles to work in Granite Bay, I have encountered significant challenges in finding suitable and affordable housing options closer to my workplace. The disparity between job opportunities and housing affordability has led to long commutes and added stress for myself and others in similar circumstances.

106-1

I believe there is an opportunity to address this issue by considering the rezoning of the property located at 3865 Old Auburn Road to allow for the development of affordable housing. Such development would not only alleviate the burden of long commutes but also contribute to a more balanced and inclusive community.

I understand the complexity of rezoning decisions and the various factors that must be considered. However, I urge you to carefully weigh the benefits of affordable housing development at this location and its potential impact on residents like myself who seek more accessible housing options.

Thank you,

Britttney Martines-Copeland

LETTER 106: BRITTNEY MARTINES-COPELAND

Response to Comment 106-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 107

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Dry Creek Rezone...STOP!!!
Date: Tuesday, March 19, 2024 10:58:06 AM
Attachments: Outlook-wufuih42.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:10 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Dry Creek Rezone...STOP!!!

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: ccota@surewest.net <ccota@surewest.net>
Sent: Thursday, March 14, 2024 9:20 AM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Dry Creek Rezone...STOP!!!

Ms Dahlgren,

Please stop the Rezoning in Dry Creek!

107-1 Dry Creek will become another Antelope if this continues. Antelope was a nice area until the LOW INCOME housing moved in.

I will be watching your vote closely as are many others.

Concerned Resident of Dry Creek.

LETTER 107: C. COSTA

Response to Comment 107-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 108

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:28:26 AM

From: Kristin Browning <kbrowningofy@gmail.com>
Sent: Friday, March 8, 2024 4:47 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

108-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately
-Kristin Cox

LETTER 108: KRISTIN COX

Response to Comment 108-1

Please see Responses to Comment Letter 62.

Letter 109

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezone Project #8 District 1 Concern
Date: Tuesday, February 20, 2024 9:35:29 AM

From: Kristin Browning <kbrowningofy@gmail.com>
Sent: Thursday, February 15, 2024 6:12 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Rezone Project #8 District 1 Concern

Good evening Supervisor Gore,

109-1 I am writing to you to address my concerns about the Rezone Project #8 in District 1 (8101 East Drive Roseville). I am a lifelong resident and active voter in this district and was extremely upset to see the plan to rezone this property which for many years has been a strawberry field.

109-2 Rezoning that property and placing multiple houses or apartment buildings would bring more people and traffic to an area that is not equipped to handle such an influx.

109-3 As a parent and teacher, I am also concerned about how this may lead to overcrowding our neighborhood schools and the impact that will have on our children's education.

109-4 I attended the board meeting on Tuesday and noted that there are a few county owned properties that could be used to meet the needs for this project instead of rezoning areas like 8101 East Drive where it just doesn't make sense.

I hope as a representative of the people in Placer County you will take into consideration our concerns and use the power we have trusted you with to oppose project #8 in District 1.

Thank you for your time,
Kristin Cox
100 Triple Oak Ct Roseville

LETTER 109: KRISTIN COX

Response to Comment 109-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 109-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 109-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 6 – Impacts to Local Schools.

Response to Comment 109-4
Please see Master Response 3 – County-Owned Sites.

Letter 110

Date: March 17, 2024

To: Placer County Board of Supervisors and Chris Pahule, Placer County

From: Kellie Criscione, Folsom Lake Estates, Granite Bay Resident

Regarding: Rezone Proposal for Site 26 in Granite Bay Ca. 8989 Auburn Folsom Rd, as part of the Placer County Housing Element Proposal. HE-1 , RHNA

I am writing on behalf of a community of homeowners in Folsom Lake Estates in Granite Bay Ca. We are respectfully requesting that the rezoning application for Site 26 at 8989 Auburn Folsom Road be rejected. We have strong concerns about the long term affects of such a drastic change in zoning to this 17.5 acre parcel that is currently zoned commercial. Following are our concerns. 110-1

1. Infrastructure – we disagree with the Planning Departments assertion that there is adequate infrastructure for the rezone of Site 26 to this level of density. There are not adequate fire stations, police support or school capacity for this level of residential density. In addition, this community does not have a "town center" that could provide social activities and outlets for a high density development. We actually could use the current zoning on that property for a commercial use that would enhance and benefit our community. To call this area of Granite Bay a more Urbanized part of the community is an overstatement. This is not an Urban Community. Retail and commercial zones exist but are not developed to the level that would adequately support this rezone density. 110-2
2. Traffic – the traffic problems on Auburn Folsom Blvd. are a continuing frustration for the Granite Bay Community right now. The number of accidents and fatal accidents up and down this road already attests to the fact that the road cannot handle the current traffic load. A high density residential rezone on this property will increase the dangerous driving conditions. The increased load of cars and people will exacerbate what is already a problem area. This is a rural community without any public transportation and a dead end on one end of Douglas Blvd due to the lake. Our community of Folsom Lake Estates already experiences an increase in cut through traffic onto our residential roads due to the traffic load on Auburn Folsom and Douglas. The safety of our children and walking/biking neighbors is a huge concern given the increased risk with the inevitable increase in traffic. Auburn Folsom Blvd and Douglas have parts of their roadways that function as arterials in the larger communities they serve. But to assign that function to those roads as they enter Granite Bay is an overstatement of function and use. 110-3
3. Health and Safety – the fact that this rezone vote needs to occur prior to traffic impact studies, infrastructure studies, fire department and police safety studies is a concern for us. Once this property is rezoned.....there is no turning back the clock. Where are the studies that show that a low low income element at this level of density does not increase crime in an area that has no police force? Equating the Granite Bay 110-4

I10-4 cont.

unincorporated community with a study done in Irvine about crime and low-income housing is not a relevant reference for a community of our size and composition.

4. Rural Community – We have a desire to maintain the rural nature of this community. There are several communities to the North, West and East that have the infrastructure and city level planning in place that can more adequately address large high density residential housing. It is a very inappropriate zoning level for this area of Granite Bay. In addition, Site 26 has Linda Creak on it and is very close to the open spaces of Folsom Lake. The environmental impacts of such a high density development are not known at this time and it is an unfair path forward to allow Placer County to adjust zoning on a parcel that still has so many development unknowns from an environmental impact standpoint.

I10-5

5. The shortfall of lower income housing units in Placer County is a problem that the State of California requires be addressed. To rush through this rezoning process with such a large buffer of unit counts when the county has known for several years the problem needed to be addressed is a large issue for us as members of this unincorporated community. In Granite Bay, a community with a MAC, it is an insult to every community member to have the County consider forever altering the rural nature of this area by proposing such a massive density change on this parcel of land. The fact that higher density developments have already been approved within the Granite Bay community without meeting the low income required element just adds to the problems the county has created in our Granite Bay community. What does "low low income" level mean? Our community is frustrated with the lack of transparency in regards to even understanding this. To feel justified in moving forward with this proposal with only the property owner as a supporter of their land being on the "list" is a miscarriage of the process of community development.

I10-6

6. We hope that the County and the County Board of Supervisors can meet its minimum housing unit number requirement without the unalterable rezoning of Site 26. We also support the lowest "buffer" in the housing count proposal that Placer County will submit to the state for the benefit of all the properties in truly rural areas that are a part of this rezoning initiative.

I10-7

I10-8

In closing, we respectfully request that the Board of Supervisors and the Planning Commission deny rezoning Site 26 at 8989 Auburn Folsom Blvd, Granite Bay CA.

Regards,

Kellie Criscione
kelliecriscione@gmail.com
916.803.5984

LETTER 110: KELLIE CRISCIONE

Response to Comment 110-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 110-2
Please see Master Response 1 – Non-EIR/Administrative Issues. Please also see Response to Comment 25-2.

Response to Comment 110-3
Please see Master Response 4 – Traffic Safety.

Response to Comment 110-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 110-5
Please see Master Response 1 – Non-EIR/Administrative Issues. Please also see Response to Comment 52-2.

Response to Comment 110-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 110-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 110-8
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 111

From: Kelly Cross
To: Placer County Environmental Coordination Services
Subject: Property #26 re-zoning
Date: Thursday, March 14, 2024 1:09:10 PM

111-1 Hello. Please reconsider re-zoning property #26. The amount of housing you want to put in such a small space will bring too much traffic next to a middle school. Very low income housing will bring in more crime and lower our schools rating. People move to this neighborhood because of the great schools. Please keep it a commercial property.

Thank you. Kelly Cross

LETTER 111: KELLY CROSS

Response to Comment 111-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 112

From: Kelly C
To: Placer County Environmental Coordination Services
Subject: 8989 Auburn folsom rd
Date: Thursday, March 7, 2024 9:49:01 AM

112-1 | 112-2 | 112-3 |

Please stop rezoning for this property. We as a community in Granite Bay do not want a low income housing project right next-door to a junior high school. Also, there's a creek and animal habitat in this area that should not be disturbed. Please take into consideration all of the community that's against this project.. it's going to lower our property values increase crime in a great part of Granite Bay that kids feel safe walking home from school. After you bring in low income housing we will not be safe. Shame on you for even considering this.

LETTER 112: KELLY CROSS

Response to Comment 112-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 112-2
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 52-2.

Response to Comment 112-3
Please see Master Response 2 – Social and Economic Impacts.

Letter 113

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Environmental Concerns Lot #26 of State Mandated Land Re-Zone
Date: Wednesday, March 6, 2024 8:04:26 AM

From: dahlbeck1@aol.com <dahlbeck1@aol.com>
Sent: Tuesday, March 5, 2024 5:26 PM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; fgc@fgc.ca.gov
Subject: Environmental Concerns Lot #26 of State Mandated Land Re-Zone

113-1 Why are shortcuts on the EIR being allowed to happen on the proposed Re-Zone of Lot #26 in Granite Bay? The subject site has many environmental issues that demand a full and complete environmental review that should not be rushed through.

113-2 These issues include a year-round stream, vernal pools, and riparian wetlands. There is also a multitude of wildlife, possibly including nesting area's for the Golden Eagle and Swainson Hawk. There are probably other endangered species on the property or in the year-round stream.

113-3 Placer County should first use County owned property in order to comply with the State Mandated Re-Zone, not environmentally sensitive sites where the Re-Zone to high density units wouldn't fit with it's surroundings and do harm to the environment.

Please vote against the Re-Zone of Lot #26 in Granite Bay or at the very least require a full environmental review, not something just rushed through.

Sincerely,

Gary Dahlbeck
Granite Bay, CA. 95746

LETTER 113: GARY DAHLBECK

Response to Comment 113-1
Please see Master Response 5 – Programmatic vs. Site-Specific EIR.

Response to Comment 113-2
Please see Responses to Comments 52-2 and 162-8.

Response to Comment 113-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic vs. Site-Specific EIR.

Letter 114

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: 20-30 Unit Rezone of Properties in Granite Bay
Date: Tuesday, February 20, 2024 4:48:00 PM

From: dahlbeck1@aol.com <dahlbeck1@aol.com>
Sent: Tuesday, February 20, 2024 4:43 PM
To: Board Clerk <BoardClerk@placer.ca.gov>
Cc: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: 20-30 Unit Rezone of Properties in Granite Bay

114-1 This letter is in opposition to the attempt by Placer County to change and ruin Granite Bay in order to meet the State mandated rezoning of properties.

114-2 The traffic, schools, sewer, fire and law protection, will all be negatively impacted. Granite Bay is already too developed to try and cram this type of rezone into the community.

114-3 Why doesn't Placer County use county owned property to meet the State Mandated requirements? The County has still not presented a reason as to why this could not be done.

114-4 One of the identified properties, the 17 acre parcel at Auburn Folsom Road and Fuller Drive has a year round creek running through the middle of it as well as other riparian issues. It also probably has other sensitive environmental issues that has been ignored and passed over in the EIR report.

114-5 Relegate the rezoning to newer areas of Placer County where jobs are more plentiful for people and this rezoning can better fit into the overall plan or to County owned property.
The County has no problem ruining our community but won't put up their own properties to be rezoned. Something is very wrong with that picture.
Please show us all of the County owned properties and explain why they cannot be used to meet this State Mandate.

Sincerely,
Gary Dahlbeck
8700 Lake Front Drive
Granite Bay, CA. 95746

LETTER 114: GARY DAHLBECK

Response to Comment 114-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 114-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 114-3
Please see Master Response 3 – County-Owned Sites.

Response to Comment 114-4
Please see Response to Comment 52-2.

Response to Comment 114-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 3 – County-Owned Sites.

Letter 115

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Cook Riolo Rezone No!
Date: Tuesday, March 19, 2024 10:56:16 AM
Attachments: Outlook-ejwq3e3q.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:06 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Cook Riolo Rezone No!

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Dave W <birdiebubba3@gmail.com>
Sent: Saturday, March 2, 2024 12:51 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Cook Riolo Rezone No!

Dear Members of the Planning Department,

115-1 I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons.

115-2

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

115-3

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

115-4

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

115-5

4. Traffic and Safety Concerns. The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

115-6

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

115-7

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the

proposed rezoning.

Thank you for your time and consideration of the

concerns raised in this letter. I look forward to your

response and to a resolution that respects the

Interests of all stakeholders in the Dry Creek

community.

LETTER 115: DAVE W.

Response to Comment 115-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 115-2
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 115-3
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, the project's potential impacts related to utilities infrastructure are addressed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project. See also Response to Comment 81-3 regarding sewer concerns, and note that any future residential development on rezone sites within the Dry Creek area would be required to connect to public water, supplied by the Placer County Water Agency (PCWA), which, according to Table 5 of the Initial Study (Appendix A of the Draft EIR), has ample water supplies available to serve reasonably foreseeable future development during normal, dry, and multiple dry years through 2040.

Response to Comment 115-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Chapter 5, Biological Resources, of the Draft EIR, for properties within the Dry Creek area, future residential developers would be required to pay land conversion fees to the Placer County Authority (PCA), the revenues from which would fund preservation of habitat within dedicated preserve areas, pursuant to the PCCP. Preservation of habitat within dedicated preserve areas is the regional strategy on which PCCP-participating resource agencies have signed off to help balance need for development and habitat preservation.

Response to Comment 115-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 115-6
Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 6 – Impacts to Local Schools, and Response to Comment 76-2.

Response to Comment 115-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 116

From: hlhorti@sbcglobal.net
To: Placer County Environmental Coordination Services
Subject: Objection to local DEIR mandate
Date: Saturday, March 16, 2024 2:00:10 AM

116-1 Hello again, This is in addition to my original letter of rejection of Sites 71 and 72 for compacted housing on an unsafe corner with limited access to transportation, and thus access to the necessities of living, for residents via local/pubic transportation or walking (no sidewalk, extremely limited walking shoulder, narrow winding roads, poor lighting,).

116-2 I am asking if the Auburn Unified School District might have received political pressure to close AltaVista Charter School to promote/allow for the development of compacted housing on the green belt surrounding the school site? This area is adjacent to an older residential neighborhood without local services of transportation, social service delivery systems. or sources of employment. Why would this site be considered when other sites offering greater services and opportunities are readily available. Integration of concentrated housing for meeting low income housing needs has not been fully considered with respect to access to needed services for the incoming population. It seems shortsighted to not consider what accesses and services low income residents need for success in life and livelyhood when choosing location for housing.

Optimum quality of life for all residents is to be of utmost importance, not only the meeting of politicly established deadlines for an estimated and declared local population growth. with regards, Hortense Davis

LETTER 116: HORTENSE DAVIS

Response to Comment 116-1

Please see Master Response 4 – Traffic Safety.

Response to Comment 116-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 117

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Removal of Sites 71 and 72 from Auburn rezoning plan
Date: Wednesday, February 21, 2024 11:28:16 AM

From: hihorti@sbcglobal.net <hihorti@sbcglobal.net>
Sent: Wednesday, February 21, 2024 11:23 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Removal of Sites 71 and 72 from Auburn rezoning plan

117-1 | Please give careful and considered thought to removing Sites 71 and 72 from the Auburn Rezoning Plan. These sites are in close proximity to many already existing condo complexes and reduced income apartments, where further concentrated development will increase congestion in an already densely populated area which lacks sufficient infrastructure for those already living the in area. Pedestrians walk dangerously alongside heavily trafficked, frequently curving streets which have no sidewalks. Entry to parcels 71 and 72 is extremely hazardous to auto and pedestrian traffic along the blind curve where the parcels are located. The local neighborhood school has been closed and there is no primary education facility withing walking or easy commute distance. All school traffic will be routed along Lincoln Way and into already congested intersections and downtown Auburn. Emergency evacuation routes are already frequently clogged at a standstill during high use times - working and school hours of beginning and ending, as well as all-weekend recreation use of the American River Recreation Area. The surrounding neighborhoods are populated by those who are choosing to balance semi-urban/ living with the cultural and aesthetic benefits of a smaller population and footprint. I have lived in my 100+ year old home for 42 years, refurbishing it completely without changing it's footprint or increasing it's impact on neighbors and community. I coexist with the many residents of mixed income of the surrounding neighborhoods. I do not wish to live in an ever intensely jam packed housing colony resembling a rabbit warren, with insufficient light and space and air to support the choices I have continued to make, and pay taxes to maintain. In-fill is a theoretically justifiable premise. Attempting to meet the need for additional needed housing by burdening those who have maintained the quality of life here in downtown Auburn is poor community planning and would be further evidence of failing local leadership.

117-2

117-3

117-4

Respectfully submitted, Horti Davis and Bob Childs (neighbors less than a mile from Site 71 and 71 of the Auburn Rezoning Plan)

LETTER 117: HORTI DAVIS AND BOB CHILDS

Response to Comment 117-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 117-2
Please see Master Response 4 – Traffic Safety.

Response to Comment 117-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 6 – Impacts to Local Schools. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

The commenter's emergency evacuation concerns are noted by the County. It is also noted that the Local Transportation Analysis (LTA) prepared for the proposed project by Fehr & Peers determined the LOS of Lincoln Way, south of Russell Road, would be considered acceptable with the addition of project traffic (Table 5 of LTA). In addition, please see Responses to Comment Letter 174.

Response to Comment 117-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 118

From: Chuck-Muriel Davis
To: Kally Kedinger-Cecil; Placer County Environmental Coordination Services; Boardof Supervisors; Board Clerk; Andrea Dashiell
Cc: Beverly Roberts; Donna Delno
Subject: Re: Housing Element Amendment -comments 3/7/24- correction
Date: Thursday, March 7, 2024 1:00:59 PM
Attachments: image001.png

118-1

Please accept my apology!
In the original email I had specified the incorrect criteria numbers,
and I replaced them below in red.
I still standby my comments and my suggested criteria numbers.
Sorry for my errors while trying to get my comments out by the deadline.

Muriel
3/7/24

On Thursday, March 7, 2024 at 12:14:32 PM PST, Chuck-Muriel Davis <chamdavis@yahoo.com> wrote:

RE: comments on the Housing Element Amendment (see email below)

To: Kally, Planning Commission, Board of Supervisors

The new amendment is totally **inaccurate** with regard to Sites 13, 17, & 18 in the Penryn Parkway area of Penryn Road in Penryn.

The ranking scores shown on Page F-15 in Appendix F has inaccurate rankings for sites 13,17,& 18.

Transportation/accessibility --- Children cannot safely walk to schools in the area because there are no sidewalks. And if there were sidewalks, they could not go to the local elementary schools because they are at capacity. There are NO parks, NO grocery stores, NO healthcare facilities nearby. So how can planning give this criteria a 8.....it should be a 1 because it is close to the freeway, but getting onto the freeway could be a hazard because of the current traffic on Penryn Rd.

118-2

Density & building potential --- The Horseshoe Bar/Penryn Community Plan forbids high density housing and has designated the area for commercial & professional businesses for the benefit of the community. To rezone these 3 sites for RM30 VIOLATES our community plan, and the state has said that community plans must be considered for affordable housing sites. Rezoning these sites is against state guidelines. It is unfair to put such an increase in population in tiny Penryn and possibly double or triple the population of Penryn. This criteria should not be a 8 ; it should be a zero or 1.

Social Amenities -- To give this criteria a 8 for sites 12,17 & 18 is a joke!!! None of these sites are in the 'proximity' of healthcare, and recreational spaces are no way. This criteria should be zero.

Safety & Emergency Services -- Again, it is a joke to give this criteria a 10! These sites are no way near police stations, hospitals, urgent care/healthcare

118-2 Cont.

facilities. And the Penryn fire station cannot handle 3-story buildings.
Other nearby fire stations have closed....so that limits the fire safety coverage.
This criteria could be a 1, but not a 4.

MIAS area --- giving these sites a 7 being a good site for MIAS is false!
Since the MIAS objective is:
"the identification of strategies to reduce vehicle miles traveled (VMT) in Placer County, thereby benefiting air quality and providing other ancillary social benefits, particularly improvements in general community health"
....then, these sites totally violate the VMT goals....since the residents will have to drive to EVERYWHERE!!!! This criteria should also be a zero!

Besides the fact that these sites 13, 17 & 18 will concentrate much of the proposed rezone sites in a tiny rural area of Penryn, this amendment should NOT be approved. Other sites that would have more realistic & valid criterias should be evaluated.

Sincerely,
Muriel Davis
3/7/24
Penryn

----- Forwarded Message -----
From: Kally Kedinger-Cecil <kkedinge@placer.ca.gov>
Sent: Friday, March 1, 2024 at 12:16:14 PM PST
Subject: Housing Element Amendment Available for Public Review

Hello,

This email is to inform you of the availability of the Housing Element Amendment for a seven-day public review period. The amendment has been compiled to address changes that have occurred since adoption in 2021 including the revisions to the Regional Housing Needs Allocation (RHNA) shortfall, the change in approach for accommodating the shortfall (from relying on an overly to now completing a rezone), and the modifications to the Housing Element Residential Land Inventory which includes the addition of nine new sites that were not previously identified in the adopted Housing Element. The public review period is beginning today (March 1, 2024) and closes on **March 7, 2024**. Following the public review period, the amendment and any comments received will be provided to the California Department of Housing and Community Development (HCD) for a 60-day review period. The amendment will be included with the report package for the Board of Supervisors meeting for a final action in May. The amendment and the appendix are available on the Housing Element webpage. In addition to this email notice and the posting on the Housing Element webpage, a notice regarding the amendment is being posted on the County's main webpage, the Housing Needs Rezone Program webpage, and social media.

Comments on the Housing Element Amendment can be submitted to Senior Planner Kally Kedinger-Cecil at kkedinge@placer.ca.gov or submitted in writing to:

Placer County Community Development Resource Agency

Planning Services Division

3091 County Center Dr., Ste. 190

Auburn, CA 95603

Regards,

Kally Kedinger-Cecil

Senior Planner

Placer County Planning Services Division

kkedinge@placer.ca.gov

530-745-3034



LETTER 118: MURIEL DAVIS

Response to Comment 118-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 118-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. Regarding the commenter's fire-related comments, the Draft EIR acknowledges that the multi-story structures that could potentially be built on rezone sites could require a ladder truck in the event of an emergency (page 10-38 of the Draft EIR). However, as noted on page 10-38 of the Draft EIR in regard to the Penryn FPD and Placer Hills FPD,

> While a new ladder truck within the FPDs' service area would be needed to meet the response time targets (NFPA Standard 1710), this would not constitute a CEQA impact unless a new or expanded fire station facility would be needed to house the ladder truck, as such new construction or alteration could result in physical impacts to the environment. According to Chief D'Ambrogi, the Newcastle FPD station, which is a new station completed last year…, was designed to accommodate a ladder truck and can do so efficiently.[1] If this were to be done, the response times would be in the range of 5-7 minutes, using Taylor Road or I-80 to the Penryn/Loomis areas.[2] Thus, the reasonably foreseeable residential development that could potentially result from the proposed project within the Penryn FPD and Placer Hills FPD jurisdictions would not require a new fire station or alteration of an existing fire station to house a new ladder truck, should the Newcastle FPD obtain sufficient funding to purchase said truck.
>
> As previously stated, lack of funding to operate existing fire protection facilities, or purchase new equipment, is not a CEQA concern.

Nevertheless, the commenter's concerns have been forwarded to the decision-makers for their consideration.

Regarding the commenter's general VMT comment, while the proposed project would have a significant VMT impact due to not meeting the applicable threshold of significance, as shown in Table 8-2, future residential development of the rezone sites would reduce the County-wide home-based VMT per resident from 7.7 to 7.6 between Base Year No Project and Base Year Plus Project conditions. According to the TIA, such a reduction may be the result of the future residential development on the rezone sites being located closer to employment and retail locations, thus reducing trip lengths.

---

1 D'Ambrogi, Mark, Fire Marshall, Placer Hills-Newcastle-Penryn Fire Protection Districts. Personal Communication [email] with Kally Kedinger-Cecil, Senior Planner, Placer County Planning Services Division. December 14, 2023.

2 *Ibid*.

Letter 119

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Questions about Creekview Ranch affordable units- BOS 3/12/24
Date: Monday, March 11, 2024 10:02:30 AM

From: Chuck-Muriel Davis <chamdavis@yahoo.com>
Sent: Friday, March 8, 2024 7:39 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Donna Delno <delnofamily@aol.com>; Patty Neifer <pneifer@gmail.com>
Subject: Questions about Creekview Ranch affordable units- BOS 3/12/24

RE: BOS 3/12/24 - Creekview affordable units question

Hi Kally,

I have just a couple of questions, please:

1. Are the available units in the Creekview Ranch project included in the existing affordable units required by HCD?

2. Have all of the ADUs that have been built in the last few years (since they were allowed), that are less than the 750 sf , been included in the existing affordable units required by HCD?

3. Are there currently some ADU's that are being proposed by homeowners and are less than 750 sf? If so, are they included in the existing affordable units?

Thanks,
Muriel
3/8/24
PS. Below are some quotes from the 13.A staff report:

119-1

Item 13.A.:
https://www.placer.ca.gov/DocumentCenter/View/77790/13A

Page 1
The project included a Condition of Approval related to its affordable housing obligation that states the following:

182. The Placer County General Plan Housing Element Policy B-13 requires the applicant to provide affordable housing units equal to ten (10) percent of the total number of units in the project. For this project the applicant would be required to provide sixty (60) affordable housing units (598 rounded up) if built on or off-site, or deed-restricted off-site within unincorporated Placer County, as approved by the County through an Affordable Housing Agreement approved by the Board of Supervisors and executed prior to recording of the first Small Lot Subdivision Map. The environmental document for the project allows the following on-site options: A) Constructing and deed restricting sixty (60) lots/units as affordable. B) Constructing a primary dwelling along with an Accessory Dwelling Unit (ADU) on sixty (60)

119-1 cont.

of the lots and deed restricting all sixty ADU units as affordable.

Page 2

Policy HE-B-13 in the Housing Element requires that all new discretionary residential development projects in the County allocate a minimum of 10 percent of the approved units to meet the housing needs of very low-, low-, and moderate-income households. Further, Article 15.65 (Affordable Housing) of the Placer County Code implements this policy and allows for the development of accessory dwelling units as an equivalency proposal to meet affordable obligations. Currently, Housing Element Policy HE-C-3 (Accessory Dwelling Units Affordable by Design) considers ADUs of less than 750 square feet to be affordable by design and eligible to satisfy low-income housing requirements in specific plans and new developments alike. Affordability provisions are met through a deed restriction that requires the following: 1. The ADU cannot be rented for periods of less than 30 days. 2. The ADU cannot be sold separately from the primary dwelling. 3. The ADU shall conform to California State law and County Code and cannot exceed a maximum size of less than 750 square feet.

LETTER 119: MURIEL DAVIS

Response to Comment 119-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 120

From: Chuck-Muriel Davis
To: Kally Kedinger-Cecil; Boardof Supervisors; Board Clerk; Andrea Dashiell; Placer County Environmental Coordination Services; Planning Commission
Cc: Donna Delno; Beverly Roberts
Subject: REZONE PROJECT DEIR - comments 3/18/2024
Date: Monday, March 18, 2024 11:57:18 AM

To: BOS, PC, Kally Kedinger-Cecil
RE: The Rezone project DEIR - comments

Penryn residents are concerned about the proposed rezoning of the 3 parcels on Penryn Rd, #s 13, 17,& 18, to the detriment of our small community with a population of 831.

These 3 parcels are a total of 13.4 acres and, at 30 units per acre, that would mean 402 units. That would double the population of Penryn! The units could be up to 603 units because affordable developments by non-profits may be allowed an additional 50% more units.

Putting that many units in tiny Penryn is literally "segregating" low income housing in violation of HCD (Housing Community Development) mandates and is creating a disadvantaged community with NO access to jobs, mass transit, libraries, school and minimal safety public services, eg fire safety. The rezoning of these parcels violates the Horseshoe Bar/Penryn Community Plan; and the state says that community plans must be taken into consideration.

120-1

For years, Placer county allowed developers to mitigate with funds instead of building the required affordable housing, and now the county wants to flood Penryn with the affordable housing that should have been built by the developers. This is unacceptable!!!

When you compare the percentage increase of the population of Penryn, from these acres being rezoned, to the percentage increase of the populations of other communities in Placer county, nowhere will you find anything close to the 100% population increase that will happen in Penryn!!!! Other districts, like District 2, have few acres proposed for rezoning.

County needs to remove these parcels, 13,17,& 18, from the rezone project and let the community plan work. A smaller number of affordable housing units can be allowed on the parcels because they are zoned commercial.

Please remove parcels 13,17, & 18 from the list of proposed rezoned parcels and find more appropriate parcels near facilities needed by affordable housing developments.

Sincerely,
Muriel Davis
3/18/24
cc Donna Delno, Beverly Roberts

LETTER 120: MURIEL DAVIS

Response to Comment 120-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 12.1

From: Chuck-Muriel Davis
To: Kally Kedinger-Cecil; Placer County Environmental Coordination Services; Boardof Supervisors; Board Clerk; Andrea Dashiell
Cc: Beverly Roberts; Donna Delno
Subject: Fw: Housing Element Amendment -comments 3/7/24
Date: Thursday, March 7, 2024 12:14:41 PM
Attachments: image001.png

RE: comments on the Housing Element Amendment (see email below)

To: Kally, Planning Commission, Board of Supervisors

The new amendment is totally **inaccurate** with regard to Sites 13, 17, & 18 in the Penryn Parkway area of Penryn Road in Penryn.

The ranking scores shown on Page F-15 in Appendix F has inaccurate rankings for sites 13,17,& 18.

Transportation/accessibility --- Children cannot safely walk to schools in the area because there are no sidewalks. And if there were sidewalks, they could not go to the local elementary schools because they are at capacity. There are NO parks, NO grocery stores, NO healthcare facilities nearby. So how can planning give this criteria a 10.....it should be a 1 because it is close to the freeway, but getting onto the freeway could be a hazard because of the current traffic on Penryn Rd.

Density & building potential --- The Horseshoe Bar/Penryn Community Plan forbids high density housing and has designated the area for commercial & professional businesses for the benefit of the community. To rezone these 3 sites for RM30 VIOLATES our community plan, and the state has said that community plans must be considered for affordable housing sites. Rezoning these sites is against state guidelines. It is unfair to put such an increase in population in tiny Penryn and possibly double or triple the population of Penryn. This criteria should not be a 10; it should be a zero or 1.

12.1-1

Social Amenities -- To give this criteria a 10 for sites 12,17 & 18 is a joke!!! None of these sites are in the 'proximity' of healthcare, and recreational spaces are no way. This criteria should be zero.

Safety & Emergency Services -- Again, it is a joke to give this criteria a 10! These sites are no way near police stations, hospitals, urgent care/healthcare facilities. And the Penryn fire station cannot handle 3-story buildings. Other nearby fire stations have closed....so that limits the fire safety coverage. This criteria could be a 1, but not a 10.

MIAS area --- giving these sites a 10 being a good site for MIAS is false! Since the MIAS objective is:
"the identification of strategies to reduce vehicle miles traveled (VMT) in Placer County, thereby benefiting air quality and providing other ancillary social benefits, particularly improvements in general community health"
....then, these sites totally violate the VMT goals....since the residents will have to drive to EVERYWHERE!!!! This criteria should also be a zero!

121-1 cont.

Besides the fact that these sites 13, 17 & 18 will concentrate much of the proposed rezone sites in a tiny rural area of Penryn, this amendment should NOT be approved. Other sites that would have more realistic & valid criterias should be evaluated.

Sincerely,
Muriel Davis
3/7/24
Penryn

----- Forwarded Message -----
From: Kally Kedinger-Cecil <kkedinge@placer.ca.gov>
Sent: Friday, March 1, 2024 at 12:16:14 PM PST
Subject: Housing Element Amendment Available for Public Review

Hello,

This email is to inform you of the availability of the Housing Element Amendment for a seven-day public review period. The amendment has been compiled to address changes that have occurred since adoption in 2021 including the revisions to the Regional Housing Needs Allocation (RHNA) shortfall, the change in approach for accommodating the shortfall (from relying on an overly to now completing a rezone), and the modifications to the Housing Element Residential Land Inventory which includes the addition of nine new sites that were not previously identified in the adopted Housing Element. The public review period is beginning today (March 1, 2024) and closes on **March 7, 2024.** Following the public review period, the amendment and any comments received will be provided to the California Department of Housing and Community Development (HCD) for a 60-day review period. The amendment will be included with the report package for the Board of Supervisors meeting for a final action in May. The amendment and the appendix are available on the Housing Element webpage. In addition to this email notice and the posting on the Housing Element webpage, a notice regarding the amendment is being posted on the County's main webpage, the Housing Needs Rezone Program webpage, and social media.

Comments on the Housing Element Amendment can be submitted to Senior Planner Kally Kedinger-Cecil at kkedinge@placer.ca.gov or submitted in writing to:

Placer County Community Development Resource Agency

Planning Services Division

3091 County Center Dr., Ste. 190

Auburn, CA 95603

Regards,

Kally Kedinger-Cecil

Senior Planner

Placer County Planning Services Division

kkedinge@placer.ca.gov

530-745-3034



LETTER 121: MURIEL DAVIS

Response to Comment 121-1

Please see Responses to Comment Letter 118.

Letter 122

From: Chuck-Muriel Davis
To: Meghan Schwartz; Kally Kedinger-Cecil
Cc: Donna Delno; Patty Neifer
Subject: Re: Housing Element Sites Rezone (PLN22-00476) DEIR-questions.
Date: Friday, February 2, 2024 4:38:58 PM
Attachments: image002.png

Hi Meghan & Kally,

122-1

Please confirm that the Rezone workshop is on Feb 13th, at 2pm in the PC room!!

Will the Rezone EIR be a timed item at the PC hearing on Feb 22nd?

Will the item be an action item, in other words, will the PC vote on a recommendation to the BOS at this meeting?

Thanks,
Muriel
2/2/24

On Friday, February 2, 2024 at 01:46:10 PM PST, Meghan Schwartz <mschwartz@placer.ca.gov> wrote:

The Draft Environmental Impact Report (DEIR) for the subject project has been released for public review from **February 2, 2024 thru March 18, 2024**.

The Notice of Available of the Draft EIR is attached for your convenience, and you can view/download the DEIR at the link below:

Housing Element Sites Rezone | Placer County, CA

The Planning Commission will accept verbal comments on the DEIR at the following meeting:

Thursday, February 22, 2024

A public meeting will be held on February 22, 2024, to receive comments on the Draft EIR. Public comment will be offered in-person and virtually:

- In-Person: Placer County Planning Commission, Planning Commission Hearing Room, Community Development Resource Center, 3091 County Center Drive, Auburn, California.
- Virtually through a Zoom meeting webinar.

The Placer County Planning Commission meeting will begin at 10:00 a.m.; however, the proposed project is not time certain. Please refer to the meeting agendas at the following link up to 1 week prior to the meetings for updated information: https://www.placer.ca.gov/AgendaCenter/Planning-Commission-53

Meghan Schwartz, CDRA Technician

Community Development Resource Agency

3091 County Center Dr, Suite #190

Auburn, CA 95603

(530) 745-3075

mschwartz@placer.ca.gov



LETTER 122: MURIEL DAVIS

Response to Comment 122-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 123

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: High Concern for re-zoning in Placer County
Date: Tuesday, March 19, 2024 10:55:31 AM
Attachments: Outlook-2kfzngqb.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:04 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: High Concern for re-zoning in Placer County

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Eva Dayananthan <eva.dayananthan@gmail.com>
Sent: Wednesday, February 28, 2024 1:51 PM
To: Board Clerk <BoardClerk@placer.ca.gov>; Supervisor Gore <SupervisorGore@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: High Concern for re-zoning in Placer County

Dear Placer County Board of Supervisors:

123-1

I do not approve of the sites for low income housing in Placer County across from Creekview Ranch school (parcels 9 and 10 totaling 4.6 acres). I also do not approve of any low income housing on Brady Lane either. This would not be good for our community because it would decrease home value and decrease safety, especially by a school that has children as young as TK. Low income housing

123-1 cont.

means there should be services and public transportation nearby which there is not. With a lack of services and resources for low income families near and around the proposed building sites, this proposal makes absolutely no sense. The plan to maintain low density housing and open space needs to continue. I will be bringing this to the Vineyard community as a concern to escalate.

Sincerely,
Eva Dayananthan
Board Member of Vineyard Community HOA

Eva Dayananthan | Design Engineering, Activation & Product | ⊙ Target

LETTER 123: EVA DAYANANTHAN

Response to Comment 123-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 124

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: 2-22-2024 meeting comments- plz add to the record
Date: Wednesday, February 28, 2024 3:40:49 PM

-----Original Message-----
From: Donna Delno <delnofamily@aol.com>
Sent: Thursday, February 22, 2024 1:16 PM
To: Placer County Planning <Planning@placer.ca.gov>
Cc: Chuck-Muriel Davis <chamdavis@yahoo.com>; Patty Neifer <Pneifer@gmail.com>; Larissa Berry <lzkberry2@gmail.com>
Subject: 2-22-2024 meeting comments- plz add to the record

Dear planning dept-
This entire process has been rushed.

In your housing element, approved by HCD YEARS ago, it clearly stated that Placer had a shortfall of 1,107 affordable units requiring a rezone of 55.3 acres.

Amending PC code 17.52.060 to a minimum number of units from 20 to 30 would reduce the number of acres required to 36.9.

Instead of using county properties which would absorb almost half of the shortfall and a zoning text amendment, Planning is for all intents and purposes taking control of our community plans.

124-1

Forcing an agenda which will double the population of Penryn.

Burden Auburn with additional low income households.
and

Will shred the fabric of Granite Bay with high density not anticipated in their plan.

This is wrong. It should have been addressed when it was discovered, not now in a hurried, piecemealed and unplanned fashion.

In over 300 pages of comments there was only one voice in favor. We need housing and affordable housing but not done like this.

Use county properties, change the ordinance and then come back to us with a reasonable plan I challenge the RHNA numbers and using UN sustainable goals implementing into SACOG , to HCD, a NGO agency that cannot make laws and is trying to ruin Placer .....in the name of equity.
We will accept our fair share in Penryn which is about 59 Units.
HTP needs to move his project proposal for penryn road to west Roseville, where there are jobs and services.

Thank you for your consideration

Donna Delno
23 Penryn resident

LETTER 124: DONNA DELNO

Response to Comment 124-1

Please see Master Response 3 – County-Owned Sites.

Letter 125

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Deir comments (while I wait for county owned map)
Date: Wednesday, March 6, 2024 4:50:19 PM

From: Donna Delno <delnofamily@aol.com>
Sent: Wednesday, March 6, 2024 3:33 PM
To: Jim Holmes <JHolmes@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Cheryl Berkema <cheryl.berkema@gmail.com>; Christopher Pahule <cpahule@placer.ca.gov>; Clayton Cook <CCook@placer.ca.gov>
Cc: Chuck-Muriel Davis <chamdavis@yahoo.com>; Patty Neifer <pneifer@gmail.com>; Cheryl Berkema <cheryl.berkema@gmail.com>
Subject: Deir comments (while I wait for county owned map)

125-1 Dear Jim, Chris, Clayton and Kally:
While I'm still waiting on the requests of county owned property map with amenities overlays, I wish to also make this comment:

125-2 The DEIR failed to analyze for adequate public services as evidenced by a financially failing Auburn Area school districts.
Since the apartments will bring in inadequate tax dollars to support the influx of students which can be logically assumed,
what will be required as mitigation? Surely no new taxes!



Auburn city council addresses school district 'strife'
email.myteamscoop.com

LETTER 125: DONNA DELNO

Response to Comment 125-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 125-2
Please see Master Response 6 – Impacts to Local Schools.

Letter 126

From: Donna Delno
To: Chuck-Muriel Davis
Cc: Kally Kedinger-Cecil; Placer County Environmental Coordination Services; Boardof Supervisors; Board Clerk; Andrea Dashiell; Beverly Roberts
Subject: Housing Element Amendment -comments 3/7/24
Date: Thursday, March 7, 2024 12:36:16 PM

Please add these comments to the DEIR:

126-1

Yesterday, a fatality happened on the freeway near Penryn/ guess where thousands of cars landed when the lanes closed?
Thousands of cars landed on our narrow 2 loan country roads Penryn and Loomis .
I would like to propose a 5 mile buffer zone from Highway 80, for the Penryn and Loomis area, that no high density development is allowed.
If our town had a large fire or emergency, at the same time the freeway was closed, we would have no way to escape.
High density needs to be where the roads can handle it, and not near or impacting our rural country roads, which are very narrow.
For this reason alone, I ask that all high density development be done more in designated areas,
on county properties.... Near infrastructure and established roads that can handle this.
Rural roads cannot handle high density, nor freeway overflow when the freeway accidents happen. Our established taxpaying resident's safety must come first.
Thank you-

Donna Delno
24 year Penryn resident and advocate



Fatal I-80 crash closes multiple lanes near Penryn
goldcountrymedia.com

LETTER 126: DONNA DELNO

Response to Comment 126-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. The commenter also expresses concerns regarding a scenario whereby Interstate 80 is closed during the event of a large fire or emergency. While possible, the scenario is unlikely and speculative as to when and where such an event could occur. According to CEQA Guidelines Section 15145, "If, 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."

Letter 127

From: Donna Delno
To: Placer County Environmental Coordination Services; Kally Kedinger-Cecil
Subject: DEIR comments-rezone
Date: Tuesday, February 27, 2024 8:29:48 PM
Attachments: Revision-Presentation-23-24.pdf

Here are my comments on the DEIR:

127-1

Auburn is currently facing a potential negative operating budget- based on state funding reductions.

Does the county take into account the potential impacts on increasing the student population of a school district facing financial crisis?
When California is facing a 78 billion dollar shortfall, who will fund all these plans you have?
With inflation at 15% truly, everyone is struggling to make ends meet and your constituents will never vote for higher taxes.

Back to the drawing board in West Roseville where ....jobs....transit, schools, fire and shopping are established and cost less, than plopping into small unincorporated towns.
Thank you for doing the right thing and choose appropriate locations. Why not the old Kmart in Rocklin, on Pacific? Vacant for 5 years!
Next to shopping , freeway, jobs, transit and services. That would cost less than new builds!


Auburn Union School District
Adopted Budget Revisions/
45 Day Revision
2023-2024
Board presentation: August 23, 2023

What were the major reasons for revisions?

- **Changes to the State allocations for Learning Recovery Block Grant and the Arts/Music/Instructional Materials Block Grant**
  - Per Original Proposal, this was to be reduced with anticipated reduction percentages changing quickly. Currently we are estimating from trailer bill language that reductions will equal around 6%
- **Estimated Actuals - Changes to Starting Balances and Audit Adjustments.**
  - Final direction on how to post audit adjustments received *after* posting of Original Budget. Items are now adjusted in 22-23 fiscal year and correct starting balances are in system.
- **Changes to P-2 ADA and Annual ADA reporting.**
  - As this drives the estimated revenues from the LCFF Formula, corrections that were made in July were incorporated into the budget.

Changes since Adopted Budget

Changes since Adopted Budget 2023-24

	Adopted Budget 2023-24			Revised Original Budget 2023-24			Changes Adopted Budget			Note
	Unrestricted	Restricted	Combined	Unrestricted	Restricted	Combined	Unrestricted	Restricted	Combined	
Revenue										
General Purpose	17,185,229	375,646	17,560,875	17,140,040	375,646	17,515,686	(45,189)	0	(45,189)	1
Federal Revenue	0	2,540,754	2,540,754	0	2,540,754	2,540,754	0	0	0	
State Revenue	265,176	2,942,456	3,207,632	265,176	2,942,456	3,207,632	0	0	0	
Local Revenue	450,950	1,506,295	1,957,245	450,950	1,506,295	1,957,245	0	0	0	
Total Revenue	17,901,355	7,365,151	25,266,506	17,856,166	7,365,151	25,221,317	(45,189)	0	(45,189)	
Expenditures										
Certificated Salaries	5,700,734	2,063,781	7,764,515	5,825,734	2,063,781	7,889,515	125,000	0	125,000	2
Classified Salaries	1,963,910	1,337,467	3,301,377	1,978,910	1,337,467	3,316,377	15,000	0	15,000	2
Benefits	2,662,512	2,214,996	4,877,508	2,662,512	2,214,996	4,877,508	0	0	0	
Books and Supplies	650,014	1,002,912	1,652,926	650,014	1,002,912	1,652,926	0	0	0	
Other Services & Oper. Expenses	2,636,097	3,361,280	5,997,377	2,636,097	3,361,280	5,997,377	0	0	0	
Capital Outlay	0	740,622	740,622	0	740,622	740,622	0	0	0	
Other Outgo 7xxx	0	923,805	923,805	0	923,805	923,805	0	0	0	
Transfer of Indirect 73xx	(591,520)	559,520	(32,000)	(591,520)	559,520	(32,000)	0	0	0	
Total Expenditures	13,021,747	12,204,383	**25,226**,130	13,161,747	12,204,383	25,366,130	140,000	0	140,000	
Deficit/Surplus	4,879,608	(4,839,232)	40,376	4,694,419	(4,839,232)	(144,813)	(185,189)	0	(185,189)	3
Other Sources/(uses)	0	0	0	0	0	0	0	0	0	
Transfers in/(out)	(150,000)	0	(150,000)	(150,000)	0	(150,000)	0	0	0	
Contributions to Restricted	(5,034,038)	5,034,038	0	(5,034,038)	5,034,038	0	0	0	0	
Net increase (decrease) in Fund Balance	**(304,430)**	**194,806**	**(109,624)**	**(489,619)**	**194,806**	**(294,813)**	**(185,189)**	**0**	**(185,189)**	3
Beginning Balance	3,931,921	4,841,116	8,773,037	3,221,328	4,841,116	8,062,444	(710,593)		(710,593)	4
Ending Balance	3,627,491	5,035,922	8,663,413	2,731,709	5,035,922	7,767,631	(895,782)	0	(895,782)	4
Revolving/Stores/Prepaids	10,000		10,000	10,000		10,000	0	0	0	
Reserve for Econ Uncertainty (3%)	756,781		756,781	760,981		760,981	4,200	0	4,200	5
Restricted Programs		5,035,922	5,035,922	0	5,035,922	5,035,922	0		0	6
Assignments	386,000		386,000	386,000		386,000	0	0	0	
Unappropriated Fund Balance	**2,474,710**	**0**	**2,474,710**	**1,574,728**	**0**	**1,574,728**	**(899,982)**	**0**	**(899,982)**	
Unappropriated Percent			***9.8%***			*6.2%*				

Changes Since Adopted, Slide 2

1. Decrease in LCFF funding due to P-2 corrections and Annual ADA Reporting
2. Increases in salary/benefits from original estimations
3. Increased deficit due to less income and increased expenses
4. Corrected beginning fund balances from 22-23 Estimated Actuals
5. 3% required reserved adjusted to expenditures
6. Corrected beginning fund balances from 22-23 Estimated Actuals, Increase in Restricted Funding

Deficit Spending

Net Increase (decrease) in Fund Balance	(489,619)	194,806	(294,813)	(1,322,483)	(1,571,465)	(2,893,948)	(485,742)	(1,637,167)	(2,122,909)
Beginning Balance	3,221,328	4,841,116	8,062,444	2,731,709	5,035,922	7,767,631	1,409,226	3,464,457	4,873,683
Ending Balance	2,731,709	5,035,922	7,767,631	1,409,226	3,464,457	4,873,683	923,484	1,827,290	2,750,774
Revolving/Stores/Prepaids	10,000		10,000	10,000		10,000	10,000		10,000
Reserve for Econ Uncertainty (3%)	760,981		760,981	742,150		742,150	735,801		735,801
Reserve for Curriculum Adoption	250,000		250,000	250,000		250,000			0
Reserve for Technology Replacement	136,000		136,000	136,000		136,000	136,000		136,000
Restricted Programs		5,035,922	5,035,922		3,464,457	3,464,457	0	1,827,290	1,827,290
			0			0			0
Unappropriated Fund Balance	1,574,728	0	1,574,728	271,076	0	271,076	41,683	0	41,683
Unappropriated Percent			6.2%			1.1%			0.2%

With current identified budget reductions the District is projected to continue to deficit spend which will continue to reduce the fund balance in out years.

Identified Budget Reductions

As District staff continues to work at identifying budget reductions, we have noted items on the Multi Year Projection that call out the sum of the reductions each fiscal year. Once these have been adjusted within the budget, these reduction lines can be eliminated or adjusted.

	2023-24	2024-25	2025-26
Budget Reductions - 1x Reductions	0	0	0
Budget Reductions - Ongoing	0	(786,938) (786,938)	(786,938) (786,938)

Detailed Budget Reductions for 2024-25

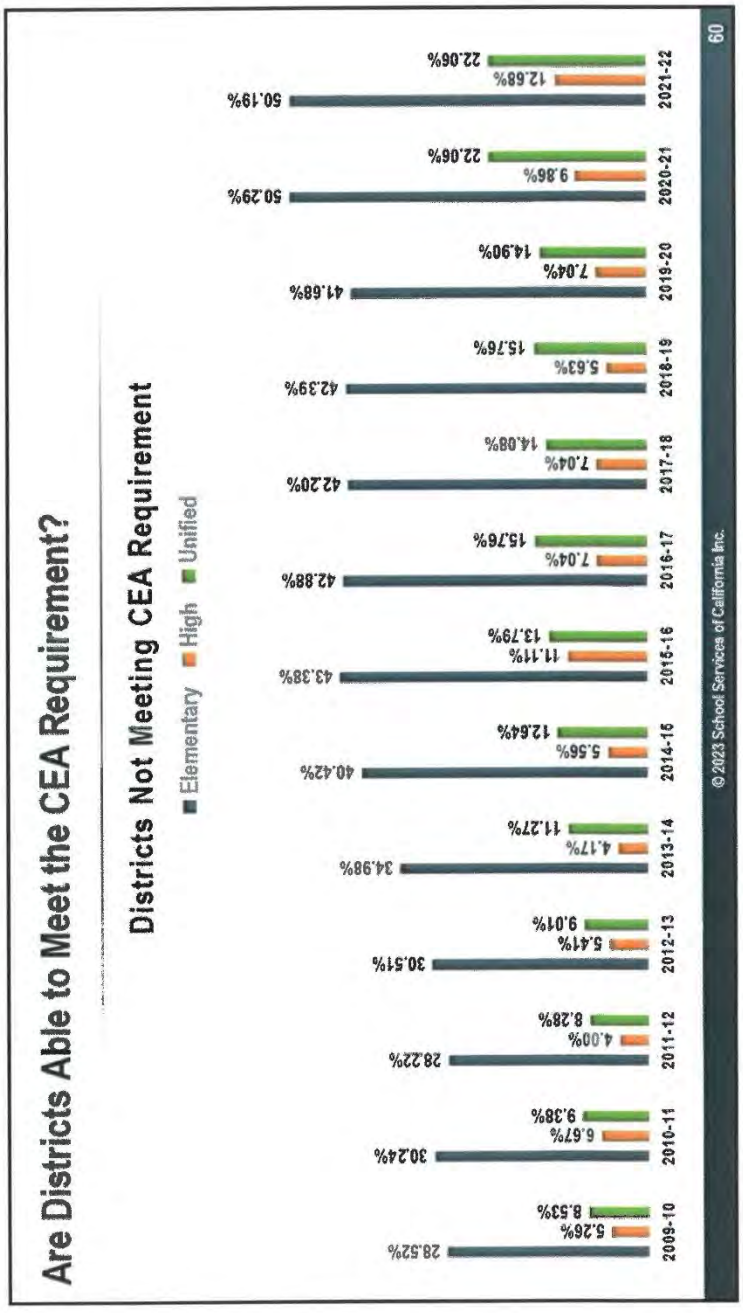
Impact of Budget Savings and Reduction Plan
on Unrestricted General Fund

		2023-24	2024-25	2025-26
Ongoing Budget Reduction Plan	**Object Code**			
Eliminate Vacancies - Certificated	2000		$ 470,822	
Eliminated Vacancies - Benefits	3000		$ 158,521	
Eliminate Asst Supt Ed Srvc	2000		$ 133,346	
Eliminate Asst Supt Ed Srvc - Benefits	3000		$ 24,249	
		$ -	$ 786,938	$ -

Moving reductions to 1st Interim

Staff is moving forward with noted vacancy reductions in 2023-24. This will enable us to reduce spending in this fiscal year, and allowing for less deficit spending and higher fund balance in out years. However, other reductions will still need to be pursued.

CEA Minimum - Current Expense of Education Formula
Elementary Districts 60%
Auburn Union 51.20%
Difference 8.80%
State set formula for Classroom Expenses vs. Certificated Salary and Benefits
Calculation uses both Unrestricted and Restricted. Since COVID, all District have received an influx on one time funding that skews this ratio. It is considered poor practice to use one time money for ongoing costs, such as salaries and benefits. While being good stewards of funding in one case, districts are not meeting this ratio


Are Districts Able to Meet the CEA Requirement?
Districts Not Meeting CEA Requirement
Elementary
High
Unified
2009-10
28.52%
5.26%
8.53%
2010-11
30.24%
6.67%
9.38%
2011-12
28.22%
4.00%
8.28%
2012-13
30.51%
5.41%
9.01%
2013-14
34.98%
4.17%
11.27%
2014-15
40.42%
5.56%
12.64%
2015-16
43.38%
11.11%
13.79%
2016-17
42.88%
7.04%
15.76%
2017-18
42.20%
7.04%
14.08%
2018-19
42.39%
5.63%
15.76%
2019-20
41.68%
7.04%
14.90%
2020-21
50.29%
9.86%
22.06%
2021-22
50.19%
12.68%
22.06%
© 2023 School Services of California Inc.
60

What does the COLA really equal for AUSD with Revisions?

Year	Funded ADA*	LCFF Entitlement per ADA	Total Funds
2022-23	1513.45	$11,245.00	$17,147,943
2023-24	1402.16	$12,132.00 (per LCFF calculator)	$17,140,040
		Dollar amount decrease	($7,903.00)
		Percentage Change	(.046%)
*Funded ADA is average of 3 prior years, will be different than actual ADA			

Minimum Wage Increases Still Going

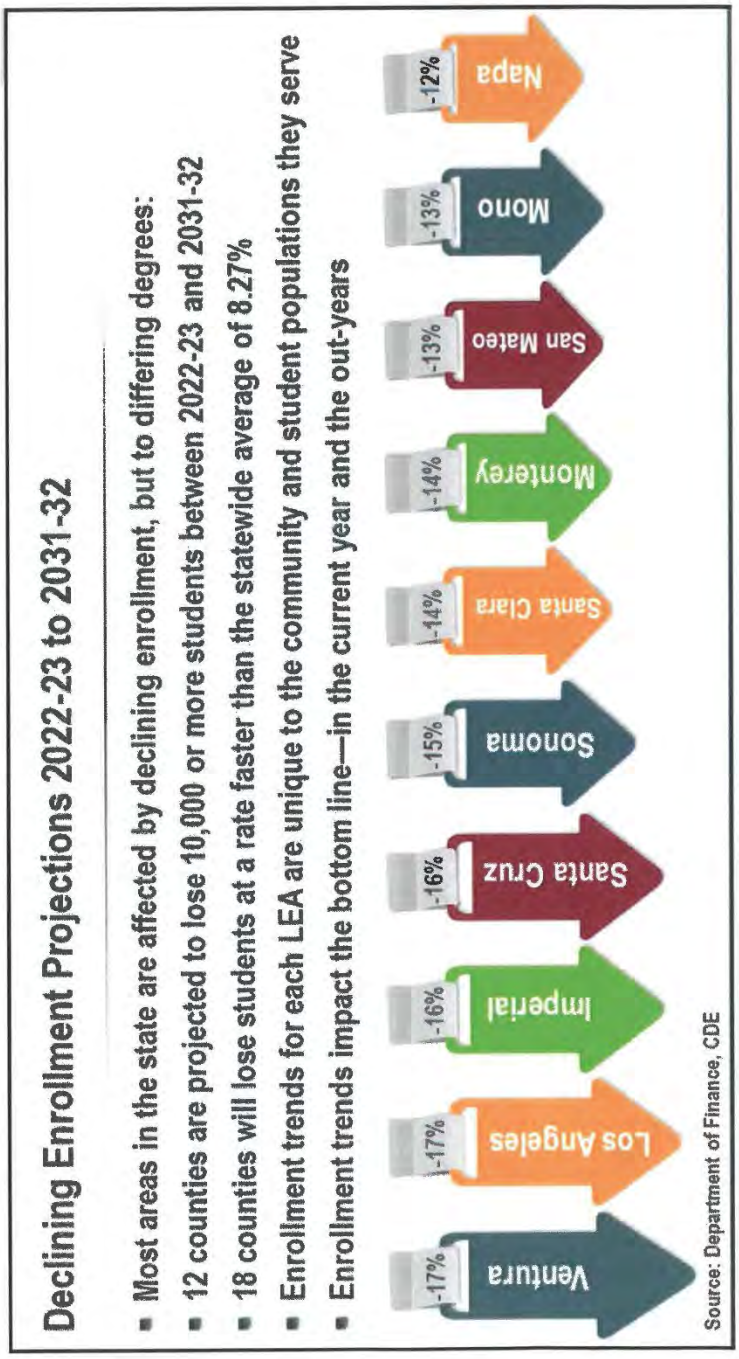
January 1, 2024 - $16.00/hour

January 1, 2025 - $16.50/hour

increases continue

January 1, 2029 - $18.30/hour

Here is where will we need to increase our Classified Salary Schedule, and do so to all steps to avoid compression.


Declining Enrollment Projections 2022-23 to 2031-32
Most areas in the state are affected by declining enrollment, but to differing degrees:
12 counties are projected to lose 10,000 or more students between 2022-23 and 2031-32
18 counties will lose students at a rate faster than the statewide average of 8.27%
Enrollment trends for each LEA are unique to the community and student populations they serve
Enrollment trends impact the bottom line—in the current year and the out-years
Ventura -17%
Los Angeles -17%
Imperial -16%
Santa Cruz -16%
Sonoma -15%
Santa Clara -14%
Monterey -14%
San Mateo -13%
Mono -13%
Napa -12%
Source: Department of Finance, CDE

LCFF Equity Multiplier

The Enacted Budget includes $300 million annually for the new LCFF Equity Multiplier, an add-on to the LCFF to accelerate gains in closing opportunity and outcome gaps—COLA applied starting in 2024-25

Eligibility:
LEAs with schools with prior-year nonstability rate >25% and prior-year socioeconomically disadvantaged pupil rate >70%
- Excludes nonclassroom-based charter schools

Allocation:
Funding allocated per student, using school's total prior-year adjusted cumulative enrollment
- Minimum of $50,000 per eligible school

Nonstability Rate:
Percentage of students who are either enrolled for less than 245 continuous days between July 1 and June 30 of the prior year, or exited from a school between July 1 and June 30 due to truancy, expulsion, or for unknown reasons and without stable subsequent enrollment at another school

Socioeconomically Disadvantaged:
- Neither parent has a high school diploma
- Eligible for federal free or reduced-price meals
- Meets federal "migratory child" definition
- Homeless child
- Foster youth
- Enrolled in county juvenile court school



Adjusted Cumulative Enrollment:
Any enrollment with a start date in the school year

© 2023 School Services of California Inc.
47

Commercial Real Estate Crisis
Office Vacancy Rate
14.70%
10.35%
14.40%
9.22%
19.10%
6.04%
Los Angeles
San Diego
San Francisco
2019
2023
Office vacancy rates have increased
Decreased demand for commercial property undermines property values
As commercial property debts mature, some owners will have trouble refinancing with buildings worth less than the value of loans
$1.5 trillion in commercial mortgages is due for repayment before the end of 2025
© 2023 School Services of California Inc.
13

Budgeting and State Calendar

December 2023 - State to receive next flow of tax revenue

December 15th - First Interim Budget Report

January 2024 - State to determine surplus/deficit of anticipated tax revenue.

March 2024 - Second Interim Budget Report

It is being warned to all affected by the State's ongoing reductions in tax revenues that we could have additional cuts and/or deferrals in January. 2024-25 budget creation may look very different.

Summary

- Budget is still certifying **Positive**, with noted reductions allowing AUSD to meet required reserves.

- The District is still deficit spending and will need to identify further reductions in the next fiscal year to avoid the possibility of a Negative budget next fiscal year.

LETTER 127: DONNA DELNO

Response to Comment 127-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 6 – Impacts to Local Schools.

Letter 128

From: Donna Delno
To: Placer County Environmental Coordination Services
Subject: 2-22-2024 meeting comments- plz add to the record
Date: Thursday, February 22, 2024 2:19:10 PM

Dear planning dept and public servants:
This entire process has been rushed.

In your housing element, approved by HCD YEARS ago, it clearly stated that Placer had a shortfall of 1,107 affordable units requiring a rezone of 55.3 acres.

Amending PC code 17.52.060 to a minimum number of units from 20 to 30 would reduce the number of acres required to 36.9.

Instead of using county properties which would absorb almost half of the shortfall and a zoning text amendment, Planning is for all intents and purposes taking control of our community plans.

Forcing an agenda which will double the population of Penryn.

128-1

Burden Auburn with additional low income households.
and

Will shred the fabric of Granite Bay with high density not anticipated in their plan.

This is wrong. It should have been addressed when it was discovered, not now in a hurried, piecemealed and unplanned fashion.

In over 300 pages of comments there was only one voice in favor. We need housing and affordable housing but not done like this.

Use county properties, change the ordinance and then come back to us with a reasonable plan
I challenge the RHNA numbers and using UN sustainable goals implementing into SACOG , to HCD, a NGO agency that cannot make laws and is trying to ruin Placer .....in the name of equity.
We will accept our fair share in Penryn which is about 59 Units.
HTP needs to move his project proposal for penryn road to west Roseville, where there are jobs and services.

Thank you for your consideration

Donna Delno
23 Penryn resident

LETTER 128: DONNA DELNO

Response to Comment 128-1

Please see Response to Comment 124-1.

Letter 129

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Bayside development
Date: Tuesday, February 20, 2024 9:38:05 AM

From: Kadie DeMar <kmdemar@gmail.com>
Sent: Sunday, February 18, 2024 9:12 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Bayside development

Hello Kally-
I am a Granite Bay resident that lives off of Olive Ranch Road. I have a few questions about the property by Bayside Church.

What does a potential 96 units look like on 3.6 acres?

129-1

How many stories would those apartments have to be in order to house those 96 units?

With this current state mandate, how does Granite Bay's unincorporated status factor in? Does it change how the rules apply? Is it solely up to the supervisors since we are unincorporated? If we were a city that was incorporated or we're part of Roseville or Loomis would that change who gets to say yes or no?

129-2

How do the new state mandates affect how the environmental impact is mitigated? There are many vernal pools and year round creeks in that

As residents, how do we formally voice our opposition?

How much do the new state mandates taken into consideration adjacent properties and potential property value destruction?

129-3

How much does the process take into consideration ingress and egress, and overall infrastructure of the community?

I would imagine you are very busy, So please know I really appreciate your time. I'd ask that you not refer me to a pamphlet to answer these questions. I really appreciate your time and thoughtful approach to our Community's development.

Best
Kadie DeMar

LETTER 129: KADIE DEMAR

Response to Comment 129-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Future development within the RM30 zone district would be subject to the development standards and design guidelines including maximum height standards established in the County's Multifamily and Mixed Use Design Manual. The County's purpose in developing the Manual was to provide a better framework for the design of future housing developments and the permit approval process, ensuring a good fit for multifamily and mixed use projects within existing communities in unincorporated areas of the County.

Response to Comment 129-2

Please see Master Response 1 – Non-EIR/Administrative Issues. Potential impacts to aquatic resources are addressed in Chapter 5, Biological Resources, of the Draft EIR, and the subject rezone site is within the PCCP area, which includes avoidance and minimization measures that any future residential development would be required to comply with prior to site disturbance.

Response to Comment 129-3

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 130

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Dry Creek Rezoning
Date: Tuesday, March 19, 2024 10:56:29 AM
Attachments: Outlook-ajpm4fqb.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:06 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Dry Creek Rezoning

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Jim Dennis <sixofsix89@aol.com>
Sent: Monday, March 4, 2024 2:53 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Dry Creek Rezoning

To our District 1 Planning Commission Representative,

130-1

My wife and I purchased our home in Morgan Creek in 2007 because we loved the rural environment, large properties, abundant area for migrating birds, and the "country feeling. This area has long been a "low light" area without the harsh neon of urban areas. Walking on the rural roads we could see chickens, goats, cows, horses, and even llamas and emus; not to mention migrating geese and ducks - along with roaming wild turkeys.

130-1 cont.

Our grand daughter graduated from Dry Creek elementary and from Creekview Ranch middle school. The smaller school size was a plus because students could get more teacher attention.

130-2
130-3
130-4

Over the past few years more and more of this rural area has been lost to developers - thousands and thousands of new homes being constructed with a rapidly creeping of urban development over the rural landscape. Our roads designed for rural environments are becoming overcrowded, Creekview Ranch is over capacity for number of students to teachers, wildlife is disappearing, the Dry Creek creek is being encroached upon more and more, and county and city services (fire, water, sewage, police/sheriff,) are straining to keep up.

130-5

We are very concerned with the increasing urbanization of the historic Dry Creek region and to now hear that the county is perhaps going to approve building a multi-tenant complex (which will have to be at least 3 or 4 stories based on the number of proposed units) directly across the street from Creekview Ranch. This will only add to the strain on the limited county/city services, add even more traffic on roads never designed for "city" traffic (as there is little/no public transportation, nor shopping, within reasonable walking distance).

130-6

We urge you to discuss with the commission the potential negative impacts of these proposals (loss of open space, impact on school/teachers, impact on county/city services, and impact on roads. High density housing, we believe, is better suiting being done as "infill" in urban areas (like the new multi-story development in old town Roseville) - where access to public transportation, shopping, and entertainment are more readily available.

James and Linda Dennis
8554 Brackenwood Court
Roseville
916-788-0304

LETTER 130: JAMES AND LINDA DENNIS

Response to Comment 130-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 130-2
Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 130-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 6 – Impacts to Local Schools.

Response to Comment 130-4
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 27-3 and Response to Comment 115-3.

Response to Comment 130-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Responses to Comment Letter 4.

Response to Comment 130-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 131

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30
Date: Tuesday, March 19, 2024 10:56:11 AM
Attachments: Outlook-nlsbdm3c.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:06 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Elizabeth Donnelly <estark3232@gmail.com>
Sent: Friday, March 1, 2024 9:29 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Dear Representative Robyn Dahlgren,

131-1 ↓

I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties, especially sites 9 and 10, to allow for high-density, low-income housing developments of 20-30 units per acre.

My family and I have lived in our home for one year on Silky Oak Way. We moved here because we love the country community and open spaces. My children will attend Creekview Ranch Elementary which is across from sites 9 and 10. As a homeowner and parent of students who will attend Creekview Ranch Elementary school I disagree with rezoning sites 9 and 10. I do not think it is a good fit for our neighborhood and will not be safe for the children attending the school due to traffic and safety concerns.

The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

131-1 cont.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services. I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that you consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning. Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely,

Elizabeth Donnelly
3125 Silky Oak Drive
Roseville, CA 95747

LETTER 131: ELIZABETH DONNELLY

Response to Comment 131-1

Please see Responses to Comment Letter 115.

Letter 132

From: Elizabeth Donnelly
To: Placer County Environmental Coordination Services
Subject: Housing Rezone Program Draft Environmental Impact Report (DEIR)
Date: Sunday, March 17, 2024 9:08:28 AM

Good morning,

My name is Elizabeth Donnelly and I am a member of the Dry Creek Community. I wanted to share my concerns with the tentative rezoning here in my community.

132-1

1) There was no community input on these proposed sites and the input that has been given has been covered in such a way as to allow for as little public knowledge of the proposed sites as possible.

132-2

2)Each of the sites has significant impact on the local area from traffic to pedestrian safety, 3) Since these are all proposed in long-standing communities with dozens of senior citizens who have lived here for decades, it will bring significant negative impacts for these citizens.
4) Two are proposed right across from a K-8 school where sidewalk access and traffic problems are already an issue.

132-3

5) All the proposed sites within the Dry Creek Area are on limited fire protection (covered by 1 Cal Fire station) and limited police (covered by the county sheriff's office which has a long response time within the area)

Thank you for hearing my concerns,

Elizabeth Donnelly

LETTER 132: ELIZABETH DONNELLY

Response to Comment 132-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 132-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. In addition, please see Responses to Comment Letter 4.

Response to Comment 132-3
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 27-3.

Letter 133

From: Kevin Donnelly
To: Placer County Environmental Coordination Services
Subject: Housing Rezone Impact
Date: Sunday, March 17, 2024 6:29:19 PM

Good evening,

My name is Kevin Donnelly and I am a member of the Dry Creek Community and specifically next to sites 9 and 10. I wanted to share my concerns with the tentative rezoning here in my community.

1) There was no community input on these proposed sites and the input that has been given has been covered in such a way as to allow for as little public knowledge of the proposed sites as possible.

2) Each of the sites has significant impact on the local area from traffic to pedestrian safety,

133-1

3) Since these are all proposed in long-standing communities with dozens of senior citizens who have lived here for decades, it will bring significant negative impacts for these citizens.

4) Two are proposed right across from a K-8 school where sidewalk access and traffic problems are already an issue.

5) All the proposed sites within the Dry Creek Area are on limited fire protection (covered by 1 Cal Fire station) and limited police (covered by the county sheriff's office which has a long response time within the area)

Thank you for reading and taking our rural community in to consideration when making a final decision.

Kevin Donnelly

LETTER 133: KEVIN DONNELLY

Response to Comment 133-1

Please see Responses to Comment Letter 132.

Letter 134

From: CRD
To: Placer County Environmental Coordination Services
Subject: Opposition Letter - District 1 Placer Rezone and DEIR. Submitted 4:55pm 4/18/24
Date: Monday, March 18, 2024 8:58:32 PM

Hello
I am emailing to submit public comment on the environmental impact of District 1 Rezone plan in Placer County.

134-1 A simple Google Maps search – will show the area is specifically shown as a 'greenspace area' even by google – and shows the historic and protected Dry Creek.
This picture is a very easy and suitable representation of the utter and immense impact this would have—and the area of the water flow and creek and Water table effect that would be present.

134-2 This area is also completely VOID of all infrastructure, sidewalks, ADA ramps, electrical – and other items to support large high density housing
The Environmental impact of adding these would be staggering and substantial.

134-3 It would also displace many animals and wildlife that truly only have this area left, which the map shows again.

134-4 Thank you for the consideration and I hope the facts are addressed and corrected, and Rezone is Not Approved

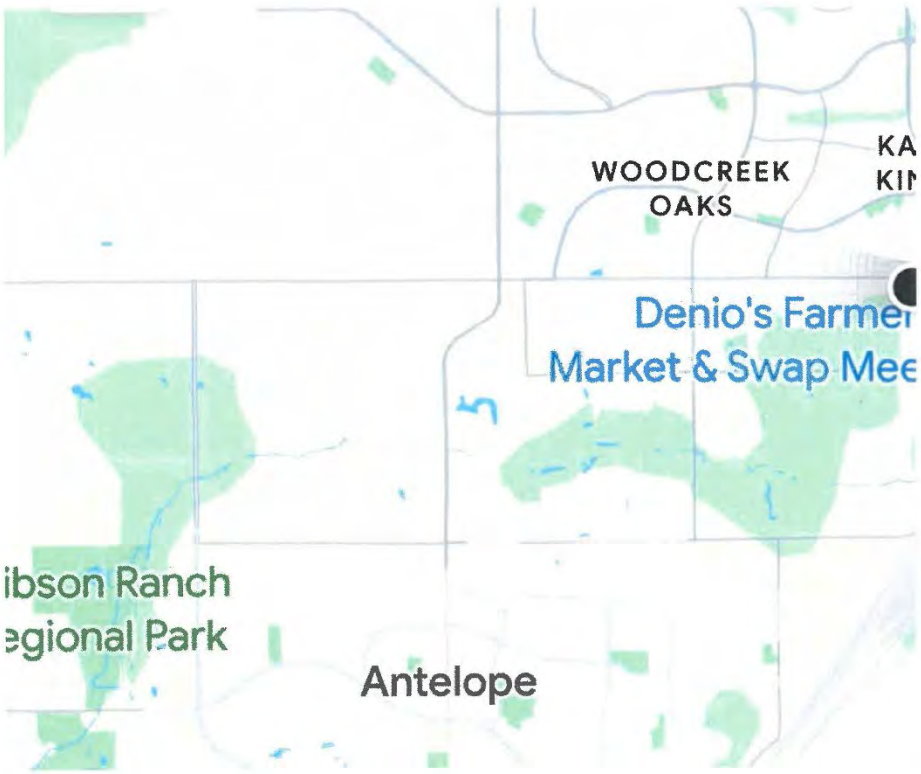
Sincerely,
Chris Driessen & Family

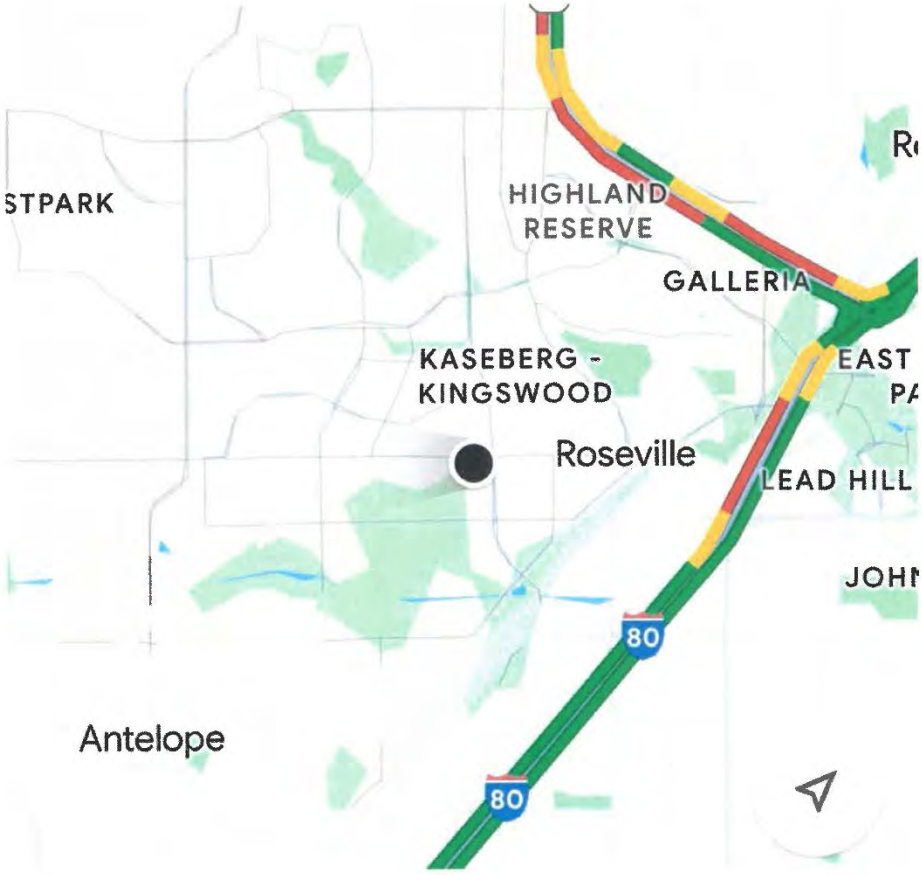
Google Map Pictures attached below

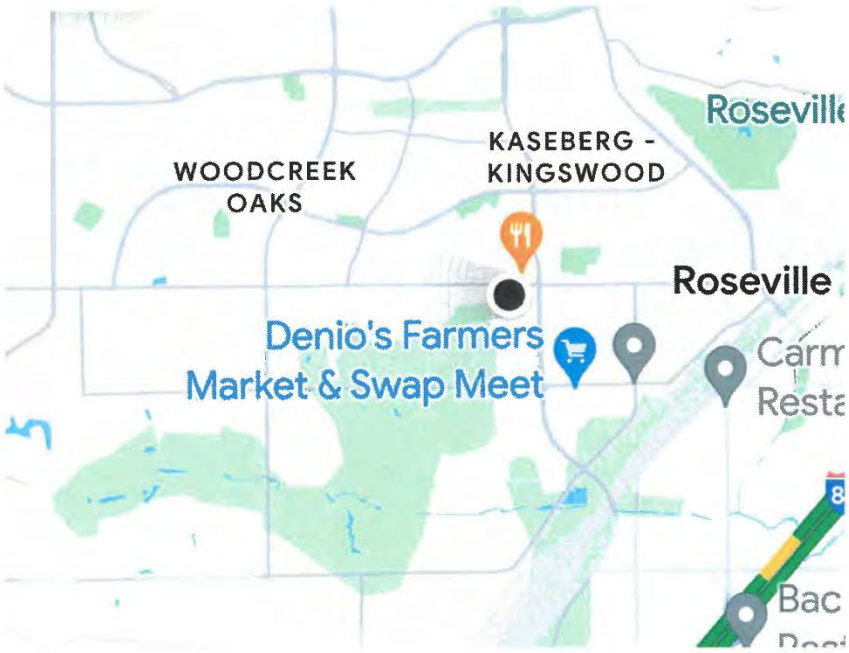
Also noted :

134-5 **Lot 8 (East Drive AKA The Strawberry field)** is also currently **zoned agricultural/low density housing**. It serves the local community by providing fresh fruit and vegetables. It is the **start of the flow area for drainage from the surrounding community down to lot 7 and away**. In the past, additional drainage from the city of Roseville (across Baseline) has caused backup of water across the lower parcels and creating flooding havoc for properties near to East Driver. **All lots adjacent to this proposed rezoning are 1-2 acre minimums (several of which have livestock or bees).** At least one property bordering this **lot had their well run dry in recent years** and they were **unable to redrill a well because of the flood plain issue.** Another lot directly adjacent to it has **goats** which have been known to escape their pens. On East Drive, Carol Lane and Central (the country roads sitting right beside this proposed site) has **small country roads without sidewalks or street lights** on which people **ride horses and walk their dogs** around the block. The **area directly connected** to it has **over 30 senior citizens who have lived in this community for 30-80 years**. Suddenly **brining in high-rise, high-density apartment buildings would be a total destruction of their community on numerous levels.**
Lots 9 & 10 are **directly across from an elementary school** (K-8) which currently is at capacity. It also sits on a **rural two-lane road**which has **numerous accidents.** It is also **served by the county sheriff's office** and has had **problems with response times in emergency situations**. This site also sits almost adjacent to the local creek (Dry Creek) which has had flooding issues but runoff from the **additional paving required by an apartment complex could pose toxic runoff problems into said creek**. The additional **traffic congestion** caused by this development on that **two-lane road would be detrimental to land owners farther up the road**.
Moving out of the Dry Creek area, the proposal to put apartments in the **Sheridan area** is flawed for multiple reasons. First, the lack of resources such as **fire and police protection** (served by the county sheriff). Second, the **lack of access to shopping** (there is only a small convenience store in town and the nearest availability of large-scaleshopping is more than 15 miles away). There are also **not local jobs and there is not access to any regional transit.**
It needs to be stated that most of these area properties that the County has specifically pursued—not a developer pursuing the County for a rezone—except it seems for one property in **Auburn** in which the **developer is wanting to put luxury apartments** into an area near a ravine that was previously not zoned for apartments. **If this develop goes in for luxury apartments, it seems that it would not meet the purpose of this rezoning proposal which is to find places for low-income, high-density housing—thus causing the County to seek other places for those units.**
As you should be able to see, **the overall DEIR submitted by Placer County is flawed on multiple counts and needs to be sent back for further review of individual sites** if the goal is to make a plan that works and not destroy existing communities.

Thank you again


WOODCREEK
OAKS
KA
KI
Denio's Farmer
Market & Swap Mee
5
ibson Ranch
egional Park
Antelope


STPARK
HIGHLAND
RESERVE
GALLERIA
KASEBERG -
KINGSWOOD
EAST
Roseville
LEAD HILL
80
Antelope
80


Roseville
KASEBERG -
KINGSWOOD
WOODCREEK
OAKS
Roseville
Denio's Farmers
Market & Swap Meet
Carm
Resta
Bac

LETTER 134: CHRIS DRIESSEN

Response to Comment 134-1
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see Response to Comment 59-3.

Response to Comment 134-2
Please see Master Response 1 – Non-EIR/Administrative Issues. The commenter appears to be referring to the Dry Creek area when stating "This area is completely void of all infrastructure, sidewalks, ADA ramps, electrical…" The statement is incorrect as evidenced by the discussion of water, sewer, drainage, and other infrastructure within Sections XVII, Transportation, and XIX, Utilities and Service Systems, of the Initial Study (Appendix A to the Draft EIR).

Response to Comment 134-3
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, potential impacts to special-status species and habitat are addressed in Chapter 5, Biological Resources, of the Draft EIR.

Response to Comment 134-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 134-5
Please see Responses to Comment Letter 76.

Letter 135

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: PUBLIC COMMENT FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT (Rezone)
Date: Monday, March 11, 2024 10:34:40 AM

-----Original Message-----
From: CMD <cmdriessen@gmail.com>
Sent: Monday, March 11, 2024 12:15 AM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: PUBLIC COMMENT FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT (Rezone)

Hello Placer County Staff and HCD Staff,

135-1 We are writing to vehemently oppose the District 1 Rezone Pending. This is Public record comment— Opposing District 1 Rezone.

I am writing to express 5 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (**this alone would have dealt with the shortfall!**).
I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

135-2 3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable.
Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

135-3 5).This rezoning initiative may create zones for high density housing, but in the process it dumps unforeseen property value decreases onto long-time tax payers who bought property and houses in beautiful rural areas expecting to enjoy what they paid for without being penalized.

135-3 cont.

Yes, affordable housing is helpful to many "soon to be" residents of Placer County, but thorough planning and appropriate locations are also equally important. At least people who would be buying in new developments with included adjacent high density housing would know what they are signing up for. That is not the case for locals.

135-4

For these 5 reasons , I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

135-5

My wife and I would warmly welcome the opportunity to walk the site and local area on baseline/east so you can all see first hand what we speak of.

Thank you for your time,
Chris Driessen

LETTER 135: CHRIS DRIESSEN

Response to Comment 135-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 135-2
Please see Responses to Comment Letter 62.

Response to Comment 135-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 135-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 135-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 136

From: C R Dulis
To: Placer County Environmental Coordination Services
Cc: Planning Commission
Subject: Project 26 (8989 Auburn Folsom Rd)
Date: Friday, March 8, 2024 12:14:23 PM

136-1 I have lived in Granite Bay for 22 years and really enjoy the community. Project 26 will dramatically change the environment in that area. I am requesting that this property be removed from the list. If it can't be removed from the list, then please do a full EIR on the property to make sure all environmental impacts have been considered.
Thank you,

Craig

LETTER 136: CRAIG DULIS

Response to Comment 136-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic vs. Site-Specific EIR.

Letter 137

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: I strongly oppose Dry Creek sites 8 and 9 rezoning
Date: Tuesday, March 19, 2024 10:56:01 AM
Attachments: Outlook-yvtmiu23.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:05 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: I strongly oppose Dry Creek sites 8 and 9 rezoning

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Dimple Dullabh <dkdullabh81@yahoo.com>
Sent: Friday, March 1, 2024 7:36 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: I strongly oppose Dry Creek sites 8 and 9 rezoning

Hello Representative Dahlgren,

137-1 I am writing to express my strong opposition to the rezoning of Dry Creek sites 9 &10 as well as 7 & 8 to high density, low income housing. While the local community may be unable to prevent development, that in itself will be detrimental to the area, nearly all residents in the Dry Creek community neighborhoods are completely opposed to the addition of multi-family housing that will cause traffic and safety problems, create

137-2 | even more problems with schools that are already over-capacity, and lower the
137-3 | property values of the existing community.

137-4 | Cook Riolo Road has already become very busy and will only get significantly busier once the nearby Costco comes. Adding dense housing directly on Cook Riolo directly across Creekview Ranch School will only make that intersection super congested. Cook Riolo Rd is already very congested in the mornings and afternoon (school hours), adding low income / high density housing right near this impacted intersection makes no sense!!! Traffic and safety of pedestrians (students mainly) are major areas of concern.

137-5 | Schools in the area are already reported at overcapacity, and the council should not approve multi-family dwellings that creates or exacerbates a situation that will cause school concurrency to fail for this proposal and/or other approved plans.

137-6 | Property values are likely to go down in the area if multi-family apartments or condominiums are built. Multi family dwellings are very inconsistent with the neighborhoods developed in the area. There are many parcels that in much better situated areas for such projects! We moved to the area due to the low density of housing in Dry Creek, and have enjoyed it very much. This would upset many in the area!

137-7 | I urge you to disapprove the proposed rezoning, and from recent meetings and discussions with my neighbors, I know my opinions are shared by many who have not managed to attend meeting or write letters and emails.

Thank you for your continued service and support of our communities.

Regards,
Dimple Dullabh
Concerned Dry Creek Neighbor
Roseville, CA 95747

Sent from Yahoo Mail for iPhone

LETTER 137: DIMPLE DULLABH

Response to Comment 137-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 137-2
Please see Master Response 6 – Impacts to Local Schools.

Response to Comment 137-3
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 137-4
Please see Master Response 4 – Traffic Safety and Responses to Comment Letter 4. In addition, as discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 137-5
Please see Master Response 6 – Impacts to Local Schools.

Response to Comment 137-6
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 137-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 138

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Site 26 Auburn Folsom
Date: Thursday, March 7, 2024 2:47:57 PM

-----Original Message-----
From: Christi Earhart <earharts4@me.com>
Sent: Thursday, March 7, 2024 2:29 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Frank Udvarhely <fudvarhely@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Site 26 Auburn Folsom

138-1

I am sending this message to all of you as a concerned homeowner in Granite Bay California in regards to Site 26 at the corner of Auburn Folsom and Fuller right next to Cavitt junior high school I understand you're down to the wire and you're trying to scramble to figure out where to put low low income apartments. This is not the spot, considering that most registered sex offenders don't even register in the state of California and would most likely live in low low income apartments is INSANITY! There has not even been a proper environmental impact study for this area that runs along Linda Creek shame on you for cutting corners. Do the jobs you were elected to do and protect our community. If this project goes through it certainly was not supported by the community and you are all personally responsible for failing this community .
Christi Earhart
Homeowner
8417 Seeno Ave
Granite Bay
Sent from my iPhone

LETTER 138: CHRISTI EARHART

Response to Comment 138-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. Regarding Linda Creek concerns, please see Response to Comment 52-2.

Letter 139

From: Christi Earhart
To: Placer County Environmental Coordination Services
Subject: Proper EIR for Project 26
Date: Thursday, March 7, 2024 2:15:47 PM

139-1 I am completely and utterly disappointed in the people we have elected to take care of our beautiful unincorporated area of Granite Bay. I have lived in this community since 1987 and have watched this beautiful community get completely obliterated by giant homes and people moving here from the bay area changing our rural area FOREVER.
NOW you want to put in low low income apartments on the corner of Fuller and Auburn Folsom next to Cavitt Jr High School (how many unregistered sex offenders are gonna be living in these apartments?)

139-2 This project will destroy the habitat around Linda Creek. Do a proper environmental impact study on project 26, and quit being so sneaky and underhanded to the community by holding meetings while
people have to work for a living to pay our super high taxes to pay for these leaches on our system.

Christi & Brandon Earhart
Homeowners
8417 Seeno Ave
Granite Bay, CA 95746
Sent from my iPhone

LETTER 139: CHRISTI AND BRANDON EARHART

Response to Comment 139-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 139-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. Regarding Linda Creek concerns, please see Response to Comment 52-2.

Letter 140

From: Kasie Eaton
To: Placer County Environmental Coordination Services
Subject: Re: Stop project 26
Date: Monday, March 11, 2024 7:47:10 PM
Attachments: image002.png

140-1 Ohhhhh this is an automated response… fantastic to know you are actually working for Placer Co residents and paying attention to your complaints & respecting their word. I pray you take this more seriously as we (the GB people) do!

Kasie Eaton
DRE 01784223
916-308-1515
HomeSmart ICARE Realty
Mobile Device Message

On Mon, Mar 11, 2024 at 2:57 PM Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov> wrote:

> Thank you for your interest in the subject project and for taking the time to provide comments. This is to confirm that your comments have been received. Also, you are now on our master email and/or USPS distribution list for the subject project and, as such, you will receive updates and notifications of future opportunities for participation and input.
>
> Thank you,
>
> **Meghan Schwartz, CDRA Technician**
> Community Development Resource Agency
> 3091 County Center Dr, Suite #190
> Auburn, CA 95603
> (530) 745-3075
> mschwartz@placer.ca.gov

From: Kasie Eaton <kasieeatonsellshomes@gmail.com>
Sent: Friday, March 8, 2024 12:10 PM
To: Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>; Kasie Eaton <KasieEatonSellsHomes@gmail.com>
Subject: Stop project 26

Hello,

I attended the meeting at the Granite Bay library last night. It was quite disturbing for many of us residents that take great pride in our community and healthy upbringing of our families. Corner of Fuller and Auburn Folsom is not a location for 1400 unit apartments because of, but not limited to high traffic, it's close proximity to a junior high school, crime & drugs, not having resources to support elevated population, etc! You ARE PUTTING OUR CHILDREN AT RISK! STOP THIS PROJECT!

140-2

7722 Lakeshore Dr, Granite Bay, CA 95746- Kasie, Thomas & Knox (11)

Kasie Eaton
DRE 01784223
916-308-1515
HomeSmart ICARE Realty
Mobile Device Message

LETTER 140: KASIE EATON

Response to Comment 140-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 140-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 141

From: Kasie Eaton
To: Placer County Environmental Coordination Services; Kasie Eaton
Subject: Stop project 26
Date: Friday, March 8, 2024 12:09:59 PM

141-1

Hello,
I attended the meeting at the Granite Bay library last night. It was quite disturbing for many of us residents that take great pride in our community and healthy upbringing of our families. Corner of Fuller and Auburn Folsom is not a location for 1400 unit apartments because of, but not limited to high traffic, it's close proximity to a junior high school, crime & drugs, not having resources to support elevated population, etc! You ARE PUTTING OUR CHILDREN AT RISK! STOP THIS PROJECT!

7722 Lakeshore Dr, Granite Bay, CA 95746- Kasie, Thomas & Knox (11)

Kasie Eaton
DRE 01784223
916-308-1515
HomeSmart ICARE Realty
Mobile Device Message

LETTER 141: KASIE EATON

Response to Comment 141-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 142

From: Sharon Elam
To: Board Clerk
Cc: Cindy Gustafson; Beverly Roberts; Supervisor Gore; Shanti Landon; Suzanne Jones; Placer County Environmental Coordination Services
Subject: Housing Element High Density RM-30 Rezoning
Date: Friday, February 9, 2024 4:56:03 PM

142-1

. I'm writing to request that you remove the parcel located on Florence & Hwy 49 from your rezoning plans.

I understand the county is afraid of the State and is now in a pickle because of prior bad decisions by the county. However, I submit that the planning department should be looking for parcels to rezone closer to the counties major job sites and shopping. Plus anyone who now drives Hwy 49 understands we already have a traffic problem that your decision would make worse. Rezoning a rural parcel without access to sewer and water, located on a high traffic road is clearly a poor planning decision.

Sincerely,
Sharon Elam

LETTER 142: SHARON ELAM

Response to Comment 142-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 143

From: John & Tanja Elbert
To: Board Clerk; Placer County Environmental Coordination Services
Subject: Housing Element Sites Rezone Project Concerns - Sheridan
Date: Thursday, March 7, 2024 8:54:34 AM

To whom it may concern,

I have been following the progress of the potential Sheridan rezone sites, there is one currently still under consideration. I must say I was shocked to see Sheridan even being considered for a multi-family home rezone. Last year I looked through Placer County's updated General Plan for Sheridan, it specifically lays out that Sheridan is set to not have a density increase.

When choosing the properties for consideration, don't you take into consideration the General Plan designations? Sheridan (population of 1,279 as of 2023) does not have the infrastructure to accommodate a RD-20 or RD-30 housing project.

- The sewer infrastructure is very outdated and cannot accommodate 20-30 more homes.
- We do not have 24/7 fire station; fire fighters have to come from Lincoln area.
- No sidewalks, building site very close to train tracks with no secure fencing to protect children from accessing train tracks, trains go very fast through town.
- No transportation system, no RT stops.
- Traffic for this particular location should be studied before re-zone as it is a narrow two-lane small road.
- Limited to any other resources; we only have a small convenient store with limited hours. No banking, gas station, grocery store, etc.
- The neighboring parcel is a burnt down historic building, this historic site next to the parcel in question has hazards that children could get into with no plans to update and improve the site.
- Multi density housing would look completely out of place, there are no two-story buildings nearby.
- There is no room for parking accommodations for 20-30 new homes.
- Sheridan in a designated WUI zone (Wildlife Urban Interface) and is more prone to quick moving fires. The town has historically burnt down twice in the past.

143-1

The above limitations should make this parcel ineligible for rezone consideration. I understand that Sheridan may grow at some point, but I feel that it is Placer counties duty to do it responsibly and not just throw multifamily homes into a rural community to satisfy your housing counts. Any Sheridan resident looking to rezone/build must satisfy all the counties requirements; the county should have to follow their own rules as well.

It has been my experience in the past that in order to get a rezone you must have tentative building plans approved first. Blanket rezoning without considering all elements of a specific project is reckless and irresponsible of the county. This is not something that should be rushed through to satisfy state requirements, especially in a small rural town that does not have a single RD-5 or above (that I know of) besides possibly the small mobile home park.

Placer County is a large county that has an abundance of other towns/cities that would be more appropriate for a multi housing project. Please remove the Sheridan site from your list of parcels that you have under consideration, it is out of place and unsupported at this time.

Thank you,

Tanja S. Elbert, CPC, CCS, CRC, CPB
916-729-3655
36901 Karchner Rd
Sheridan, Ca 95681

LETTER 143: TANJA ELBERT

Response to Comment 143-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Letter 144

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Reasoning of Sites 7,8,9,10
Date: Tuesday, March 19, 2024 10:58:48 AM
Attachments: Outlook-ivnmlq3y.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:13 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Reasoning of Sites 7,8,9,10

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Jack Ellering <jaellering@hotmail.com>
Sent: Monday, March 18, 2024 7:36 AM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Reasoning of Sites 7,8,9,10

Hello.
My name is Jack Ellering and my wife Bonnie and I have been residents on Evergreen Dr in the Autumn Glen neighborhood of West Roseville since May 1990. For nearly 34 years we have enjoyed a family friendly neighborhood that has embodied the definition of a solid middle class neighborhood with typical family values regardless of political persuasion.

144-1

We would like to register our opposition to the county proposal for nearby property

144-1 cont.

rezoning to high density, low income apartments off of Baseline, vineyard, and Cook Riolo Roads. While we are sympathetic to the needs of all income groups to have housing accommodations, there surely must be better location options that more closely match the demographics of the incoming population. We can not ignore the fact that our neighborhood will surely be impacted with an increase in crime with lowering property values. If this rezoning is approved, we will surely give more immediate attention to selling our home and moving to a more suitable location.

Thank you.

Jack & Bonnie Ellering

Get Outlook for iOS

LETTER 144: JACK AND BONNIE ELLERING

Response to Comment 144-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 145

From: Carrie
To: Placer County Environmental Coordination Services
Subject: Project 26
Date: Friday, March 8, 2024 5:57:00 PM

Hello,

145-1 I respectfully request that an EIR is performed on Project 26 before the project is considered for development of any kind.

Thank you,
Carrie Ellinwood
P O Box 67
Penryn, CA 95663

Sent from my iPad

LETTER 145: CARRIE ELLINWOOD

Response to Comment 145-1

Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 146

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Concern over rezoning
Date: Monday, March 11, 2024 10:37:00 AM

-----Original Message-----
From: JUDITH ELLIS <myhre11@pacbell.net>
Sent: Monday, March 11, 2024 8:35 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Concern over rezoning

146-1 I have lived in the Foresthill Avenue neighborhood for almost 40 years. I've loved being on the canyon and have been impacted by increased fire danger and see changing demographic to a younger active population.

146-2 Am very concerned with the proposed development at 85 Lincoln Way. Is it really 100s of homes? That'd create a traffic issue , wouldn't it?

146-3 Is it low income or senior housing? If I attend the meeting tonight will these questions be answered? Or is this a done deal?

Thank you so much.
Judy Ellis
532 Foresthill Ave

Sent from my iPad

LETTER 146: JUDY ELLIS

Response to Comment 146-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 146-2
Please see Master Response 1 – Non-EIR/Administrative Issues. Please also see Response to Comment 117-3.

Response to Comment 146-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 147

From: Eddie Epperson
To: Placer County Environmental Coordination Services
Subject: Project 26
Date: Friday, March 8, 2024 12:17:53 PM

147-1 I am opposed to the building of the apartment buildings next to Cavitt. Please don't ruin our community. Thank you.

Eddie Epperson
Rocklin, CA

Sent from Mail for Windows

LETTER 147: EDDIE EPPERSON

Response to Comment 147-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 148

From: Erik
To: Placer County Environmental Coordination Services
Subject: Housing Element Sites Rezone
Date: Thursday, February 29, 2024 7:48:37 PM

148-1

While I understand the need for affordable housing and I'm not opposed to it, My concern is the community you serve. I know of the Federal mandate deadlines to find and approve sites for infill. It seems like there's a comical side to how it's being approached. It paints a picture of a Mother enticing her child with rewards if they finish their homework and clean up their room.

If the aim is to satisfy Government orders rather than the community where you live and the people who elect you to speak for them, then the current path is obvious.

LETTER 148: ERIK

Response to Comment 148-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 149

From: mackenzie evans
To: Placer County Environmental Coordination Services
Subject: REZONING IN SHERIDAN
Date: Saturday, March 2, 2024 10:11:29 AM

149-1 Hello, I wanted to reach out in corespondents with the proposition to build low income housing in sheridan. This would be the worst thing for all sheridan residents. Low income housing (as an apartment building especially) would not only tarnish our farming community, but bring unwanted crime and cost us taxpayers more inevitably. We work hard for what we have and the community will start an uproar if these plans continue. The apartment building would not only be obnoxious to look at, but would look over residents homes that have been there for many years. Our small community needs to stay just that. Building more housing is not going to make our community flourish in any way. It's going to euin other peoples livelihoods and the town they grew up in just so elected officials could make themselves look better for building housing for low income families. Another topic to discuss when thinking about major changes to a community is our sewer system. We cannot take that much of a load on it, and construction to make it more feasible for the apartment buildings would make this community look even more in shambles. The statistics show that once you put a low income residency, property values go down and crime rates go up. We should focus on getting the residents we already have here in this town a reliable transport. We live 3 miles away from the nearest public transportation and you want to add more people to get stir crazy and start to look for trouble in town. I know my community and when i say NO ONE wants this apartment building to be installed. It's ridiculous that placer county didn't send out notice to all sheridan residents. This will negatively affect ALL sheridan residents. The list goes on and i have more statistics to show that this would be a grave mistake, putting long term, tax paying, hard working, residents that live in sheridan in a horrible situation. NOT EVERYWHERE NEEDS TO LOOK LIKE THE BAY AREA. If passed the county will just start taking advantage of the farming space we have to build more and more. This WILL cause an unforgiving uproar if passed.

149-2
149-3
149-4
149-5

Thank you!
- Sheridan resident since born

LETTER 149: MACKENZIE EVANS

Response to Comment 149-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 149-2
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, potential impacts of the proposed project related to utilities infrastructure, including sewer systems, are addressed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project.

Response to Comment 149-3
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 149-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 149-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 150

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Scott Faber. I am a Placer County resident with an address at 7647 Meadow Lark Lane Granite Bay, CA 95746

150-1

In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

In addition, I am writing in support of the letter written by Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024. I respectfully request the Board consider the concerned expressed therein as an extension of my own opinion.

Thank you for your time,

LETTER 150: SCOTT FABER

Response to Comment 150-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 151

From: Melissa Fannin
To: Placer County Environmental Coordination Services
Subject: 3865 Old Auburn Road
Date: Monday, March 18, 2024 2:50:19 PM

Dear Board of Supervisors:

151-1 Please approve this project for rezoning. I work in Granite Bay but live in Natomas. The commute is horrible and I love the community I work in. I simply cannot afford housing in Granite Bay. Being able to live and work in Granite Bay would improve my quality of life and allow more time with my family, and not driving.
I appreciate your time and consideration into this matter.

Melissa Fannin
916-271-5562

LETTER 151: MELISSA FANNIN

Response to Comment 151-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 152

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to inclusion of sites 71 and 72 in Rezone Project
Date: Wednesday, February 28, 2024 11:01:09 AM

From: Michael Farrauto <michael.farrauto@gmail.com>
Sent: Wednesday, February 28, 2024 10:00 AM
To: Jeff Ronten <JRonten@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>; Beverly Roberts <BRoberts@placer.ca.gov>; Kathryn Kenoyer <kkenoyer@placer.ca.gov>
Cc: A G <andreaglassberg@outlook.com>; Breckken Farrauto <breckkenf@gmail.com>
Subject: Re: Opposition to inclusion of sites 71 and 72 in Rezone Project

In follow up to Andrea Glassberg's email, I would like to reiterate the traffic safety concerns shared.

Since buying our house in 2006, I have had to assist in multiple traffic collisions including being the first on scene for a nearly fatal head on motorcycle accident that almost claimed the life of long time Auburn resident, Doug Stanley and his 10yr old son.

152-1 There is limited line of sight in both directions approaching this curve and the speed of drivers has only increased over the years.

My understanding is that the City of Auburn shares these traffic safety concerns as well as the feasibility of the proposed development density for Sites 71 and 72 (Lincoln Way Properties 1 & 2). Current County and City sewer improvements for this area are at capacity and would require substantial cost and improvements to support this level of growth.

152-2 The addition of these 2 sites appears to be based on the voluntary submission by the current land owner who would stand to make significant financial gains in the rezoning of these sites and not based on initial research efforts performed by the County to develop their list of potential properties. This would also help to explain the lack of public notice to adjoining residents prior to inclusion to the list.

I don't not believe development of this magnitude makes sense for these locations.

Thank you

Michael and Breckken Farrauto
102 Lincoln Way, Auburn

On Mon, Feb 26, 2024 at 9:50 PM A G <andreaglassberg@outlook.com> wrote:

To whom this may concern,

As a North Auburn homeowner living directly across the street from Sites 71 and 72 on Lincoln Way being considered for the Placer County Rezone Project, I am opposed to the inclusion of these properties for a multitude of reasons. I would like to alert you to two conditions, which I believe make the properties unsuitable for high density housing: traffic impact and wildfire danger.

Strategy WF-5 of the Placer County Sustainability Plan adopted in 2020 requires all large new development projects in Moderate, High, or Very High Fire Hazard Severity
Zones to have multiple points of ingress and egress to improve evacuations and emergency
response access. Sites 71 and 72 are in High Fire Hazard Severity Zone and only have a single point of ingress and egress. Furthermore, they are just on the edge of the canyon and have very steep topography, making construction very challenging.

Sites 71 and 72 have a proposed unit density of 142. The entrance to these properties is right at a blind corner on Lincoln Way where traffic incidents are occurring on a regular basis. Putting hundreds of additional vehicles on the road at this dangerous curve is a recipe for more traffic accidents and is simply unsafe.

Let me be clear, I am not opposed to high density housing or low-income housing in my neighborhood in Auburn. Mere feet from Sites 71 and 72 is a large plot of land on the southwest corner of Lincoln Way and Russell Road that has been for sale for years and appears to be a much more suitable location for higher density housing. It has multiple areas for ingress and egress. The land is flat and would be much easier to build on than sites 71 and 72.

The owner of the properties at sites 71 and 72 has been trying to develop the land for several years without success. I suspect that their willingness to participate in the Rezone program is simply due to their inability to recoup their investment on these properties. The fact that these properties have been so challenging to develop for less dense purposes should be an alert that placing a larger project at this location may not be feasible.

I urge you to reconsider including sites 71 and 72 in the Rezone plan. Take a look at the property on the southwest corner of Lincoln Way and Russell Rd. It could be a much better option.

Sincerely,

Andrea Glassberg
106 Lincoln Way, Auburn

LETTER 152: MICHAEL FARRAUTO

Response to Comment 152-1

Please see Master Response 4 – Traffic Safety. The feasibility of the site access cannot be evaluated because the proposed project does not include any site-specific development plans.

While the proposed sites are located in unincorporated areas of Placer County, Lincoln Way is owned, operated, and maintained by the City of Auburn. If development is proposed on Rezone Sites #71 and/or #72, the proposed project(s) would be reviewed in accordance with the City of Auburn's roadway and encroachment standards. The project applicant would also be required to provide engineering designs to meet applicable requirements based on the size of the proposed project. In addition, the project applicant would be required to obtain an encroachment permit from the City of Auburn in order to construct an access point on Lincoln Way.

Response to Comment 152-2

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 153

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Needs Rezone Program
Date: Tuesday, February 20, 2024 9:13:03 AM
Attachments: image001.png

From: Antoinette Fabela <afabela7@sbcglobal.net>
Sent: Wednesday, February 7, 2024 10:58 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Re: Housing Needs Rezone Program

Greetings Kally;

153-1 Hope all is well. One of my neighbors showed me a document that addresses the 72 rezoning proposals I inquired about with you back in November 2023. I have not received any notices, even though I signed up to do so. Any thoughts on how I can remain in the loop? Thank you.

Respectfully,
Antoinette Fabela

On Tuesday, November 28, 2023 at 04:36:08 PM PST, Kally Kedinger-Cecil <kkedinge@placer.ca.gov> wrote:

Hi Antoinette,

I am emailing to follow up on our phone call regarding the Housing Needs Rezone Program. I have added your email address to the notification list, and the Housing Needs Rezone Program webpage also has a link for notifications. The webpage is available here: Housing needs rezone program | Placer County, CA In addition to the notification sign up, this webpage includes an interactive map, a background of the program, and the powerpoints that have been prepared for the previous meetings. The youtube videos from yesterday's workshop and the townhall in August is also linked on the webpage.

Please feel free to forward this webpage and/or my contact information to your neighbors, and please do not hesitate to reach out should you have further questions.

Regards,

Kally Kedinger-Cecil

Senior Planner

Placer County Planning Services Division

kkedinge@placer.ca.gov

530-745-3034


COUNTY
OF
Placer

LETTER 153: ANTOINETTE FABELA

Response to Comment 153-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 154

From: Kay Fegette
To: Planning Commission; Placer County Environmental Coordination Services
Subject: Project 26
Date: Friday, March 8, 2024 2:38:08 PM

154-1 It is egregious that you are hastily trying to push through approval of this project without a proper EIR and giving only a 7-day comment period which is way too short for county residents to do research and make an informed comment.

154-2 This is an extraordinary region and habitat for many animals and native plants. To once again destroy a part of our natural habitat for more commercial profit without full and due consideration of all the ramifications is grossly negligent. You are elected to serve the community, not the developers.

154-3 Please reconsider immediately and proceed with proper, legal, procedures and ample notification to the community of all steps so they are able to give informed feedback.

Kathrine Fegette
10109 Van Riper Lane
Newcastle, CA 95658

LETTER 154: KATHRINE FEGETTE

Response to Comment 154-1

Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

A Notice of Availability announcing the release for public review of the Draft EIR was published on February 2, 2024, and the public review period continued for 45 days until March 18, 2024. In addition to being made available online through the Placer County website, copies of the Draft EIR were available to the public for review at the Colfax, Foresthill, Granite Bay, Kings Beach, Rocklin, Roseville, Tahoe City, Lincoln, Loomis and Truckee Public Libraries, the Placer County Community Development Resource Agency (Auburn and Tahoe), and the Placer County Clerk/Recorder's office (Auburn). Thus, in accordance with CEQA Guidelines Section 15087, the Draft EIR was made available for the required number of days at the requisite locations.

Response to Comment 154-2

Biological resources at each rezone site are programmatically evaluated within Chapter 5, Biological Resources, of the Draft EIR. Please also see Response to Comment 52-2.

Response to Comment 154-3

Please see Response to Comment 154-1.

Letter 155

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:20:54 AM

From: Carolina Fenske <carolina.arnone@gmail.com>
Sent: Friday, March 8, 2024 4:14 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON HOUSING ELEMENT AMENDMENT

Placer County Planning Services Division
Regarding Rezoning of Property across from Creekview Ranch School
RE: Low-Income/High-Density Development in the Dry Creek rural community adjacent to Creekview Ranch K-8 school. Sites 9 and 10.

Dear Sir or Madame:

155-1 I am a resident of the Dry Creek rural community and have a child who attends Creekview Ranch K-8 school. The proposed low-income/high-density apartment complex across from Creekview Ranch School is the most egregious and insensitive application of local government power I have ever witnessed.

155-2 Low-income/high-density apartment complexes should never be located next to schools. In the past city I lived in, our City Council made it a point to closely regulate what was allowed near schools. Was there ever even a small consideration given to the safety of children?

155-3 Have you studied traffic issues in this area, especially during drop-off and pick-up?

To put something like this in a beautiful rural community that my neighbors and I deeply treasure is...unbelievable. It is terribly inappropriate, and very, very poor planning.

155-4 I understand the rich developers in West Placer County managed to pay their way out of their 10% low-income housing obligation. That should never have been allowed. Dry Creek should not be a dumping ground for these mega-developers. Please locate this development in a safer and more appropriate location.

Carolina Arnone
530-902-7313

LETTER 155: CAROLINA FENSKE ARNONE

Response to Comment 155-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 155-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 155-3
The Draft EIR includes evaluation of potential transportation-related environmental impacts pursuant to CEQA in Chapter 8, Transportation, of the Draft EIR. Please see the discussions and analyses contained therein. In addition, please see Responses to Comment Letter 4.

Response to Comment 155-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 156

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:19:46 AM

From: Jon Fenske <jpfenske@gmail.com>
Sent: Friday, March 8, 2024 3:47 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON HOUSING ELEMENT AMENDMENT

Dear Placer County Community Development Resource Agency,

156-1 I am writing to express my opposition to the proposed rezoning of 4.6 acres (Sites 9/10) directly across from Creekview Ranch TK-8 school. I am a parent of a Creekview student and my family has long-term roots in the beautiful Dry Creek rural community.

156-2 1. First and foremost - this proposed development of low-income, high-density housing puts school children at higher risk from traffic, and crime. I would not feel safe allowing my daughter to walk to/from school. Developments of this kind have never been (and should never be) located across from schools. There is not one instance of this in the Dry Creek School District and the entire Roseville area that I am aware of.

156-3 2. Traffic - please stop by Creekview Ranch 1:15 on Monday or 2:15 on Tues-Thur and observe the mess the current traffic situation is. This development will greatly exacerbate the problem.

156-4 3. This type of development does not fit the character of the Dry Creek rural community. Surely there are better locations. I would suggest across from the proposed Sac State satellite campus. Actually, anywhere in Placer County is a better location.

156-5 4. The Dry Creek School District was not made aware of this rezoning until this past week. There has been no effort or outreach to them.

156-6 My family has lived on the same property for 40 years and has endured many unwanted developments in Dry Creek. But the proposed rezoning across from an elementary school where hundreds of kids walk and ride their bike is exponentially worse than anything before it. It is frankly depressing to me that this would even be considered by the County.

Sincerely,
Jon Fenske
2729 Country Place Dr
Roseville CA

LETTER 156: JON FENSKE

Response to Comment 156-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 156-2
Please see Master Response 2 – Social and Economic Impacts, as well as the Responses to Comments to Letter 4.

Response to Comment 156-3
The Draft EIR includes evaluation of all potential transportation-related environmental impacts that could occur as a result of the proposed project in Chapter 8, Transportation, of the Draft EIR. Please see the discussions and analyses contained therein. In addition, please see Responses to Comment Letter 4.

Response to Comment 156-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 156-5
Please see Responses to Comment Letter 4.

Response to Comment 156-6
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 157

From: Janice Fera
To: Placer County Environmental Coordination Services
Subject: Fw: Housing Element Sites Rezone (PLN22-00476) DEIR
Date: Saturday, February 17, 2024 6:50:59 PM
Attachments: image002.png
NOA_DEIR.pdf

Greetings Kally and Placer County team,

157-1 I've been reading and commenting on DEIRs for over 30 years, and this is frankly the most daunting one I've seen. It's very difficult to parse through the dozens of PDF files to determine which findings apply to the ~17 parcels still being considered for this project.

157-2 1. Would it be possible to trim down this DEIR to only include the properties that are currently under consideration? The executive summary alone is over 175 pages, so reading the entire document is not feasible.

157-3 2. Our community would benefit from a succinct table listing those findings deemed "Significant".

157-4 3. Chapter 5-36 (Biological impacts) specifically regarding setbacks from perennial streams. This has failed to be enforced in Placer County. There is an active lawsuit regarding Treelake Storage (Granite Bay) and local citizens which has been in the legal system for YEARS (and is now postponed until after the election) that cites unhindered expansion into the areas adjacent to a year round creek. Perhaps environmental laws don't apply to everyone equally, so if Treelake Storage's owner is considered an eligible candidate to run for our board of Supervisors, what guarantees do citizens have that these DEIR mitigation steps will be followed should he be elected?

Structures are not permitted within 50 feet of intermittent streams or within 100 feet of perennial streams unless authorized through an approved variance processed by Placer County. In addition, Placer County Code (Chapter 17.54.145) identifies a Watercourse Setback within which no structures are permitted except as approved by the Planning Director. The "Placer County Watercourse Setback" is defined as designated buffers for ... etc.

157-5 4. There were significant impacts noted to riparian habitats and wetlands.
In our region, agencies such as the Placer Land Trust and PG&E have acted to prevent significant damage to these habitats by PRESERVING them, not attempting to relocate or eliminate them. Placer Land Trust and PG&E Protect Rare Wetlands in Sheridan – Placer Land Trust. Please consider this approach.



Placer Land Trust and PG&E Protect Rare Wetlands in Sheridan – Placer La...

157-6

5. Regarding wildlife such as burrowing owls, birds, bumblebees, etc. there was substantial verbiage about engaging a "qualified biologist" to conduct site studies and consider alternate locations. Unfortunately loss of habitat is the main threat to many creatures addressed in the DEIR, which makes attempts at mitigation impossible.

The burrowing owl faces many threats to its population. The main threat is the continued loss of habitat. Threats to habitat include construction activities development and harassment by humans and domesticated animals. Heavy floods can destroy burrows in the ground, which can cause the destruction of eggs and young.

157-7

Please can these remarks be included in your public comments for 2/22/24? I have a work obligation on 2/22 and won't be able to attend the zoom meeting. Any additional DEIR comments will be sent after that meeting as I can find time to address this mammoth reading task.

I'd greatly appreciate if you could reply to let me know you received this email? Thank you!

Best regards,
~Janice Fera
Loomis, CA

p.s. Please can you correct your email contact info for me, to use this personal account janice_fera@yahoo.com -- not my janicefera.solano@gmail.com business account? I'd appreciate that.

----- Forwarded Message -----
From: Janice_fera@yahoo.com <janice_fera@yahoo.com>
To: "janicefera.solano@gmail.com" <janicefera.solano@gmail.com>
Sent: Tuesday, February 13, 2024 at 03:27:25 PM PST
Subject: Fwd: Housing Element Sites Rezone (PLN22-00476) DEIR

Begin forwarded message:

From: Meghan Schwartz <MSchwartz@placer.ca.gov>
Date: February 2, 2024 at 1:38:17 PM PST
Subject: Housing Element Sites Rezone (PLN22-00476) DEIR

The Draft Environmental Impact Report (DEIR) for the subject project has been released for public review from **February 2, 2024 thru March 18, 2024.**

The Notice of Available of the Draft EIR is attached for your convenience, and you can view/download the DEIR at the link below:

Housing Element Sites Rezone | Placer County, CA

The Planning Commission will accept verbal comments on the DEIR at the following meeting:

Thursday, February 22, 2024

A public meeting will be held on February 22, 2024, to receive comments on the Draft EIR. Public comment will be offered in-person and virtually:

- In-Person: Placer County Planning Commission, Planning Commission Hearing Room, Community Development Resource Center, 3091 County Center Drive, Auburn, California.
- Virtually through a Zoom meeting webinar.

The Placer County Planning Commission meeting will begin at 10:00 a.m.; however, the proposed project is not time certain. Please refer to the meeting agendas at the following link up to 1 week prior to the meetings for updated information: https://www.placer.ca.gov/AgendaCenter/Planning-Commission-53

Meghan Schwartz, CDRA Technician

Community Development Resource Agency

3091 County Center Dr, Suite #190

Auburn, CA 95603

(530) 745-3075

mschwartz@placer.ca.gov

LETTER 157: JANICE FERA

Response to Comment 157-1
The Draft EIR is organized in a standard structure and contains all of the required components, as established by CEQA Guidelines Article 9 (Contents of Environmental Impact Reports).

Response to Comment 157-2
As discussed on page 3-3 of the Draft EIR, the proposed project, as defined in the Draft EIR, is comprised of 72 properties totaling approximately 235.1 acres. While the Board of Supervisors is considering a smaller number of sites to rezone, this does not necessitate revisions to the Draft EIR analysis, which remains adequate. Thus, it would not be appropriate to "…trim down the EIR to only include the properties that are currently under consideration." Further, the Draft EIR acknowledges that the final list of sites to be rezoned is expected to ultimately contain fewer properties and acreage as the list is refined.

Response to Comment 157-3
Table 2-1, which starts on page 2-6 of the Draft EIR, includes a summary of impacts and mitigation measures for all potential environmental impacts evaluated in the Draft EIR. Table 2-1 includes the level of significance prior to mitigation, the mitigation measures (if necessary) prescribed by the Draft EIR, and the level of significance after mitigation.

Response to Comment 157-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 157-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 157-6
Mitigation Measures 5-2(u) through 5-2(w) on pages 5-85 to 5-91 of the Draft EIR contain various provisions to ensure that potential impacts to burrowing owl are reduced to a less-than-significant level, including compliance with applicable PCCP conditions, preconstruction surveys of rezone sites not within the PCCP area, and additional measures for nesting burrowing owls identified as part of the foregoing preconstruction surveys. Furthermore, as discussed in Chapter 5, Biological Resources, of the Draft EIR, future residential developers would be required to pay land conversion fees to the Placer County Authority (PCA), the revenues from which would fund preservation of habitat within dedicated preserve areas, pursuant to the PCCP. Preservation of habitat within dedicated preserve areas is the regional strategy on which PCCP-participating resource agencies have signed off to help balance need for development and habitat preservation.

Response to Comment 157-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 158

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:13:33 AM

From: LESLIE FERRINI <leslieferrini@comcast.net>
Sent: Friday, March 8, 2024 3:43 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

158-1

I am writing to express five concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.
1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.
2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues and a volunteer fire department) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.
3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.
4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly

I58-1 Cont.

I58-2

across the street from Creekview Ranch School.
For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.
5) A rural setting is not a good place for low income housing. These residents needs to able to access public transportation, work and shopping. They might not have a car. It would take miles of walking to access and type of services. This is not fair to the intended residents.

Leslie Ferrini
9403 Eagle Springs Place
Roseville

LETTER 158: LESLIE FERRINI

Response to Comment 158-1
Please see Responses to Comment Letter 62.

Response to Comment 158-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 159

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: District 1 rezoning opposition
Date: Tuesday, March 19, 2024 10:57:25 AM
Attachments: Outlook-ojjk4n5v.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:08 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: District 1 rezoning opposition

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Mike F <mfitz63@gmail.com>
Sent: Thursday, March 7, 2024 11:24 AM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: District 1 rezoning opposition

Dear Representative Dahlgren,

159-1

I'm writing this letter to voice my opposition to the rezoning of district 1 sites to high density housing. In particular, sites 9, 10, 7, 5, 4, 3, and 6. I feel high density housing does not fit with the rural nature of the Dry Creek community. In addition, high density housing brings about unwanted issues such as increased traffic, late night noise from cars with loud exhaust doing burnouts and speeding. There have already been numerous crashes and DEATHS recently on Vineyard Rd due to excess speed. PFE Rd has turned into a race track in recent years.

159-1 cont. ↑ Please take these into consideration before making a final decision.

Best Regards,
Mike Fitzpatrick
Arden Villa Pl

LETTER 159: MIKE FITZPATRICK

Response to Comment 159-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety.

Letter 160

From: Francine Foerster
To: Theodore Garelis
Cc: Suzanne Jones; Placer County Environmental Coordination Services; Planning Commission; Keri Burri
Subject: Re: Low income housing and very low income housing; zoning change for parcels next to Cavitt Jr High
Date: Saturday, March 9, 2024 9:23:19 AM

160-1

Thank you Ted for keeping us posted. I have recently learned that the state of California mandates each county identify a specific number of "potential" parcels for low income housing. If the county does not, the state will do it. My understanding is that often parcels with limitations that likely render them unappropriate are included to fulfill the requirements on numbers. A sort of shell game. A local realtor advised that the Cavitt parcel is likely one such parcel since, for all the reasons you have so well articulated, it makes no practical sense.

I fully concur with your objection and feel it is foolish to take such a risk given the radical nature of our times. Ultimately, proposing the Cavitt parcel as ideal for public housing endangers the rural nature of our community and is a disservice to all affected people, particularly those who have a greater need for public infrastructure and support. Let us hope rational thinking will prevail.

Respectfully,
Francine Foerster
8191 Walden Woods Way
Granite Bay, Ca
650-283-0539
Sent from my iPhone

> On Mar 8, 2024, at 3:43 PM, Theodore Garelis <babysallydog@gmail.com> wrote:
>
>
> Mrs Jones and the folks on the Planning Commission,
>
160-2
> I do not support re-zoning the parcels near Cavitt Junior High School. I am a ten year resident of Granite Bay. This area of Placer County is not suitable for high density development. There is a lack of jobs, shopping and transportation for low income and very low income people in this specific area of Placer County. It is not a good match for such future residents and current residents. There are other areas of Placer County where development would be more suitable.
>
> I alerted the powers-that-be to my position on this previously by messages to Placer County Staff and to Supervisor/Mrs Jones. As Mrs Jones told me she does not support such intense development and as she represents the people of this district, I would think that her position would be sufficient to end this project and to place it elsewhere.
>
160-3
> I have heard that there is some idea that an EIR would be waived for some part or all of this re-zoning project. I am not an expert on EIRs, but I have always understood that almost any project of any size whatsoever merits an EIR. This makes no sense to me.
>
> I would appreciate it if the County would take action in accordance with the sentiments expressed above.
>
> Theodore Garelis
> 8900 Los Posas Court
> Granite Bay
> 916 652 2020

LETTER 160: FRANCINE FOERSTER

Response to Comment 160-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 160-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 160-3
Preparation of an EIR to evaluate the proposed project was not waived. In addition, the Draft EIR prepared for the project contains all of the required components, as established by CEQA Guidelines Article 9 (Contents of Environmental Impact Reports). Furthermore, please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 161

March 18, 2024

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

Via email only to: cdraecs@placer.ca.gov

Subject: Housing Element Sites Rezone (PLN22-00476)
(State Clearinghouse No. 2023100581)

To Placer County:

161-1

Affordable housing is important. Its important that everyone, no matter their income, have a place to call home, a place they feel safe, a place to support/raise their family, a place to be part of a community. Our homes give us a sense of self, a sense of community, and have psychological effects on individuals – providing sense of stability. Unfortunately, Placer County's proposal for affordable housing does none of these things. While it checks the box on the County's needs to fulfill its 2021-2029 Housing Element it does this in the worst possible way for our low-income and very low-income households. It plops low-income and very low-income housing into rural areas where not only are there no services, few jobs, and little to no infrastructure, but it does it in a way that is wholly and completely inconsistent with existing land uses. Everyone in the community WILL KNOW this is affordable housing, and everyone who lives in affordable housing WILL KNOW they are different than the rest of the community. This proposal largely sets up a system of haves and have nots within our own communities. This will have lasting effects on those that live in the affordable housing as they will clearly know they are different than the rest of the community and it perpetuates a system of discrimination against those in our community who we need to uplift the most. Affordable housing should be incorporated into and a requirement of every new housing development proposed in the county in a way that makes this housing no different (other than cost) than the rest of the development. It should not be built as isolated islands of clearly different housing scattered throughout our communities.

My family and I are residents of Penryn and live within 300 feet of the proposed candidate rezone site 15. Candidate sites 14 and 16 are also nearby. The following are my specific comments on the Draft EIR.

Placer County 2
Subject: Housing Element Sites Rezone (PLN22-00476)
(State Clearinghouse No. 2023100581)

Chapter 6 – Cultural Resources

161-2

The Draft EIR appears to completely omit the fact that candidate sites 14, 15 and 16 are within the Penryn Historic District and only mentions the presence of the Penryn Historic District in Table 6-1. While no properties or historic resources that are contributing elements to the Historic District have been recorded within the current project area, there are numerous built environment historic elements of Penryn Historic District in the immediate vicinity. The presence of high density housing within the Historic District has the potential to reduce the contributing elements to the District and impact the District's status. The Draft EIR completely fails to analyze the project's impacts on the Penryn Historic District. It also fails to mention any design criteria or other factors that would be implemented to ensure that the project would not impact the District's status or contributing elements. In addition, the mitigation measures provided also completely fail to recognize the Historic District and protect it and its contributing elements in any way. Rather the mitigation measures focus solely on built environment and archeological resources, completely omitting any discussion of cultural landscape effects.

Chapter 8 – Transportation

Vehicle Miles Traveled (VMT) Analysis

The Draft EIR includes a description of the VMT analysis. Page 8-23 states that daily trip generation rates published reduce with higher density residential, with single-family detached housing generating an average of 9.43 vehicle trips per dwelling unit, and multi-family housing (low-rise) having an average daily trip rate of 6.74 vehicles per dwelling unit. Page 8-24 of the Draft EIR states that:

> Density can reduce VMT per resident generation rates by concentrating more people closer to destinations, thus reducing the amount of total driving required as compared to those same people living in a more dispersed pattern, and increasing the potential for making some trips using alternative forms of transportation (i.e. walking, biking, or transit).

161-3

The multi-family housing (low-rise) having an average daily trip rate of 6.74 vehicles per dwelling unit was then used for the analysis. Table 8-3 identifies the Project VMT screening results as either a Yes (Pass) or No (Not Pass). The consultant then adjusted the baseline VMT values to account for the project's higher density for all of those properties that did not pass in Table 8-3 before determining significance. This adjustment is completely illogical. The properties that did not pass in Table 8-3 are generally all those properties that are in rural areas. These simply is NO infrastructure that people would walk or ride their bike to in these areas and thus, the higher VMT is applicable. The Draft EIR appears to rely somewhat on the fact that many of these properties are near bus stops. At least for candidate sites 14, 15, and 16 the bus comes every 2 hours, has a very short route, and does not run on Sundays. These rural

I61-3 cont.

properties are not locations where the VMT principles that higher density reduces vehicle trips holds true. With virtually no jobs, services, grocery stores, schools or similar within walking distance of many of these rural properties, local streets not being bike friendly or safe for biking, and with marginal at best bus service, these properties should all be applied the higher VMT rate and mitigation should be applied to all of the properties that did not pass in Table 8-3.

The Draft EIR includes a mitigation measure for the VMT analysis that is wholly lacking for the context of the rural areas of the properties that did not pass the VMT analysis. The mitigation measure focuses on components presumably to get people to ride bikes more, but where will they ride to and how will they do this safely in our rural communities that have roads that were never designed for bikes? While I appreciate that the impact is significant and unavoidable because of this, this is really just a glaring indication that rural Placer County was never designed for this kind of development and has no or little infrastructure to support this development.

Pedestrian and Bicycle Facilities

I61-4

Table 8-1 on page 8-22 identifies a number of Significance Criteria that appear to not be addressed in the Draft EIR analysis. For example, in the Multi-Modal Plan Consistency line, the following are identified:

> Transit Service and Facilities – The project results in increased potential for safety conflicts involving transit vehicles and other modes of travel.
>
> Bicycle Facilities – The project results in a significant increase in bicyclists on a facility that does not have adequate bicycle facilities, such that conflicts between bicyclists and other travel modes are likely to increase.
>
> Pedestrian Facilities – The project results in an increased presence of vehicles and/or pedestrians on a facility that does not have adequate pedestrian facilities, such that conflicts between pedestrians and other travel modes are likely to increase.

Page 8-24 states that the consultant "reviewed adopted planning documents to evaluate planned pedestrian and bicycle improvements and whether reasonably feasible residential development within the proposed rezone sites would ***interfere with any planned improvements***" (emphasis added).

The Draft EIR appears to fail to conduct an analysis of the pedestrian and bicycle impacts outside of simply looking at the planned candidate sites themselves. However, Penryn is a rural community. Many of our streets in Penryn are not wide enough to safely pass two cars without at least one car slowing and pulling to the side of the road – think about that, merely an oncoming car is something that requires drivers to slow down and pull toward the side to safely

I61-4 cont.

proceed and avoid a head on collision – much less if there are pedestrians or bicyclist on the road. Many of the streets in Penryn do not have sidewalks and most have drainage ditches that parallel the lanes of traffic. To pass a bicyclist safely on English Colony Way, a driver must pull well into the lane of oncoming traffic as there simply are NO shoulders and NO sidewalks on many of the roads in Penryn. These streets were designed for a rural agricultural/low density residential area. The number of cars generated by the proposed project would not simply stay at the new development or travel solely on the roads noted in the Draft EIR. The proposed project will generate new residences in the community, who will drive on all of the roads of Penryn – taking kids to school or to a friends house, visiting others in the community, cutting through back roads to get to different locations – increasing traffic throughout the community. The Draft EIR fails to recognize the significant increase in risk of vehicles throughout the community of Penryn, potentially increasing the risk of traffic safety conflicts throughout Penryn, along with the increased risk of conflicts between bicycles and vehicles, and pedestrians and vehicles throughout the community.

I61-5

In addition, Impact 8-3 identifies a less than significant impact due to increase in hazards to vehicle safety due to design feature or incompatible uses. However, the Draft EIR first notes that the impact cannot be specifically evaluated at this time, but then goes on to state that the impact would be less than significant with design standards that all new development would be required to comply with. This conclusion seems to rely solely on the impact that the project would have on ingress and egress from project sites. However, it completely fails to consider the increase in traffic that would result from the project in the community and how that increase would be incompatible with existing uses in the community.

I61-6

Impact 8-3 appears to make a nod to this impact by identifying a series of County activities in the bullets on page 8-27 that all appear to "monitor and address traffic safety concerns." However, the use of all of these measures, while helpful to address traffic safety concerns throughout the County, are not appropriate for an EIR analysis. All of these measures are deferred mitigation measures. The impacts that result from the project on traffic safety concerns must first be evaluated and identified and, if significant, mitigation measures must be applied that are measurable and enforceable and that would be implemented prior to the impact occurring. What is proposed on page 8-27 is a wait and see approach – where the County appears to be inclined to wait and see how many people get seriously injured in vehicle/vehicle accidents or vehicle/bike or pedestrian accidents before the impact is analyzed and mitigation is determined and implemented. CEQA does not allow for a wait and see approach and does not allow the County to defer mitigation to some future time after a certain number of people have been seriously injured or died.

I61-7

I support affordable housing. Our homes give us a sense of self, a sense of community, and a sense of who we are. I would like to see more affordable housing in Penryn and throughout Placer County. But I would like to see it done in a way that makes this housing seamless with the rest of our communities and is considerate of the impacts on the community. Candidate

Placer County 5
Subject: Housing Element Sites Rezone (PLN22-00476)
(State Clearinghouse No. 2023100581)

I61-7 cont.

sites 14, 15 and 16 may be great sites for affordable housing but this should be implemented at a "medium density residential – 2 to 4 dwelling unit/acre" designation and architecturally consistent with the Penryn Historic District, so that this housing and the resulting effects to the existing and future community is seamless.

The current proposal sets up a clear system of haves and have nots within our own communities that will result in long-term damage to our communities and the individuals living in them. The County should return to the drawing board, allocate out a range of affordable housing units for each area of the county and direct each municipal advisory council to identify properties and appropriate densities for these units. This should be a bottoms up exercise to provide broad public input and ensure that affordable housing is implemented in a way that is sustainable and successful for each community in Placer County. Going forward the County should also require every new housing development proposed in the county to provide affordable housing in a way that makes this housing no different (other than cost) than the rest of the development. We should not create islands of affordable housing – we should be creating diverse communities.

Thank you for your consideration of these comments. If you have any questions, please contact me at the address below or ali@forsythe-group.com.

Sincerely,

Alicia Forsyth

Alicia Forsythe
2025 Sisley Road
Penryn, CA 95663

LETTER 161: ALICIA FORSYTHE

Response to Comment 161-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 161-2

As part of the Historic Resources Assessment, a records search by staff at the North Central Information Center (NCIC) at California State University, Sacramento was conducted, which determined that Rezone Sites #14, #15, and #16 are within the Penryn Historic District boundaries. However, neither the County nor the California State Office of Historic Preservation has adopted the Penryn Historic District as an official historic district. Furthermore, the Penryn Historic District has not been officially listed either nationally in the National Register of Historic Places (NRHP), statewide in the California Register of Historical Resources (CRHR), or locally by a government agency. Consequently, pursuant to CEQA, the Penryn Historic District does not require protection or consideration, and any buildings located within the Penryn Historic District would not be considered historic absent of a formal designation.

Response to Comment 161-3

The cited section of the Draft EIR only provides part of the evidence for why higher density, multi-family units produce lower VMT. In addition to the cited information, multi-family units are smaller with fewer bedrooms than single-family units (i.e., two or less commonly). As a result, the multi-family units have fewer people residing in them, which results in less vehicle trips than single-family units with multiple bedrooms and larger household sizes. The lower vehicle trip rates for the multi-family units, thus, also contribute to lower levels of VMT.

Had the VMT adjustment been made on type of unit alone, the multi-family units would generate 28.5 percent less VMT than single-family units independent of the presence of walking and bicycling infrastructure or transit service. Therefore, infrastructure for bicycling and walking is not necessary to achieve the vehicle trip/VMT reduction.

Response to Comment 161-4

The criteria identified in the comment were considered in the Draft EIR's analysis, as discussed under Impact 8-2 on page 8-27, which states the following:

> The County would require future applicants seeking to develop the rezone sites to construct frontage improvements to the rezone sites, which would include the development of any planned bicycle and/or pedestrian facility improvements. Further, any alterations to existing bicycle, pedestrian, or transit facilities proposed at the time individual rezone sites are developed would be required to comply with all applicable Placer County and community plan policies and design standards. Compliance with such would ensure that the proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation (i.e., bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.).

In addition, the analysis under Impact 8-3, which starts on page 8-27 of the Draft EIR, explains how the County addresses potential safety concerns that could occur in the future. Any subsequent housing project that advances for County review would be subject to the consistency

requirements identified under Impacts 8-2 and 8-3. Please also see Master Response 4 – Traffic Safety.

The commenter also acknowledges that current roadway design requires drivers to slow down when passing vehicles, bicyclists, or pedestrians, which is correct and can contribute to fewer and less severe collisions due to slow speeds in some instances. When speeds are high, the potential for severe collisions is also higher. The Federal Highway Administration (FHWA), Caltrans, and Placer County are committed to reducing collisions and collision risks through the Safe System approach.[1] According to the FHWA, "[a]pplying the Safe System approach involves anticipating human mistakes by designing and managing road infrastructure to keep the risk of a mistake low; and when a mistake leads to a crash, the impact on the human body doesn't result in a fatality or serious injury. Road design and management should encourage safe speeds and manipulate appropriate crash angles to reduce injury severity." Safe speeds are a key part of this outcome, as well as considering the allocation and type of travel space for individual modes.

When a subsequent housing project advances to review by the County, the current transportation network conditions in the immediate vicinity of that project would be evaluated, as explained under Impact 8-2, which starts on page 8-26 of the Draft EIR, as well as Master Response 4, and the project would be required to be consistent with applicable General Plan policies and County design standards developed to minimize collisions.

To the extent that any of the observed conditions noted by the commenter contribute to future collisions, the County's safety assessment procedures outlined under Impact 8-3 of the Draft EIR would be applied to improve safety outcomes.

Response to Comment 161-5

Impact 8-3 only states that the proposed project's potential to substantially increase hazards to vehicle safety due to a geometric design feature cannot be specifically evaluated at this time, because the proposed project does not propose any network changes and which individual housing sites may develop is currently unknown. However, even with the foregoing conditions, assessing whether the project included any other features that would be inconsistent with applicable General Plan policies or County design standards, such as introducing incompatible uses, was still possible.

To the extent that future development of a rezone site would cause an increase in vehicle traffic, only the change in VMT and consistency with safety-related General Plan policies and County design standards was relevant for CEQA purposes. Effects on traffic operations in the community is separately addressed in the Local Traffic Analysis prepared for the proposed project, which will otherwise be used by the County in the project review process to address consistency with Placer County General Plan goals and policies related to LOS.

Response to Comment 161-6

The expectation for new development with regard to vehicle safety is that new development projects comply with the applicable General Plan policies and County design standards. Impacts 8-2 and 8-3 directly address this requirement from a CEQA standpoint. What may occur in the future after projects are approved and operational is also a concern, but cannot be reasonably forecast when specific project details for individual sites are unknown. Even when those details

[1] U.S. Department of Transportation, Federal Highway Administration. *Zero Deaths and Safe System*. Available at: https://highways.dot.gov/safety/zero-deaths. Accessed March 2024.

are known, forecasting collisions or collision risk may be speculative given the human behavior component of collisions. The information under Impact 8-3 demonstrates that the County recognizes that collisions cannot be eliminated through development review alone and that monitoring and additional actions may be necessary to achieve the community's desired safety outcomes. Please also see Master Response 4.

Response to Comment 161-7

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 162

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Jaclyn Freeman. I have been a homeowner and resident of Granite Bay since 2017, currently at 7213 Harbor Way. My family and I have spent 33 years at 7213 Harbor Way, enjoying its unique front door access to the beautiful and abundant natural resources across the street, specifically Regional Housing Needs Allocation proposed District 4 rezone "Site 26" (as labelled in "Appendix F: Implementation of Program HE-1 Regional Housing Needs Allocation Rezone Program" dated March 2024). Site 26 is
162-1 roughly 18 acres of unique rich wildlife habitat, seasonal wetland, perennial stream, oak woodlands, and highly likely home to Federally Endangered steelhead and California Species of Concern chinook salmon as it is physically and biologically interconnected with Folsom Lake watershed and habitat. In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

As currently drafted, the Housing Element Amendment and accompanying Appendix F are ripe for litigation and must be rejected and/or redrafted to remove Site 26 because
162-2 the Board is responsible for avoiding and/or minimizing environmental damage to Site 26 where feasible. It is feasible and reasonable to remove Site 26 from the rezone program and require it undergo individualized environmental assessment under its existing zoning before development.

The Placer County Board of Supervisors is the responsible agency that must ensure CEQA's requirements are met while updating the Housing Element. The Board cannot rely on the certification from the California Department of Housing and Community Development (HCD) as an approval of its environmental review requirements. In public hearing dated February 22, 2024, county staff recommended the Planning Commission
162-3 accept the proposed Housing Needs Rezone Program Draft Environmental Impact Report before them because staff was relying on the letter from the HCD "certifying" the county's Housing Element submission. However, this is a misplacement of responsibility. The HCD does not certify that the Board will be insulated from

environmental review litigation. It certifies that the Board's submitted plan is in accordance with housing element guidance. The HCD's "Housing Element Update Guidance Attachment 1 Implementation Review" provides a completeness checklist including "Site Inventory and Analysis" which simply requires counties to produce a quote, "general description of environmental constraints to the development of housing." This standard of environmental review falls dramatically below the CEQA standards for assessing significant environmental impacts based upon substantial evidence in light of the record as a whole. The Board is responsible for meeting CEQA's requirements, not HCD's completeness checklist requirements. Because the Board cannot rely on HCD's certification to meet its environmental review requirements, it must remove Site 26 from the Housing Element Amendment. Simply put, Site 26 is not appropriate for inclusion in the rezone program because its unique environmental character warrants individualized conservative environmental impact assessment and does not fit the rezone program's generalized environmental circumstances of typical infill projects for which a "completeness checklist" may suffice.

162-3 Cont.

Site 26 is considered a "Large Site Development" under the Housing Element. This category must be removed from the Housing Element Amendment entirely because it is outside the size parameters of the state's Regional Housing Needs Allocation site requirements and its inclusion will surely lead to litigation for the County on the grounds of CEQA and other environmental law grounds.

162-4

According to HCD's webpage on Housing Element Building Blocks Site Analysis and Zoning, available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/analysis-of-sites-and-zoning, "a parcel smaller than one half acre or over 10 acres is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible." Site 26 is roughly 18 acres and should therefore be excluded from the Housing Element Amendment.

162-5

Shockingly, the Housing Element attempts to make Site 26 appear feasible and/or realistic by including incentives for Large Site Developments on page 161b of the Housing Element Amendment. It states, "an expedited review process will be available for the subdivision of larger sites into buildable lots where the development application can be found consistent with the General Plan, applicable Specific Plan, and master environmental impact report (EIR)." This is in direct contradiction to the conversations staff and the Planning Commission had at the public hearing on February 22, 2024, whereby the public was assured that this high level Draft Environmental Impact Report (DEIR or EIR) would be followed up by site specific EIRs when particularized development proposals are submitted in the future. The Board cannot include the Large Site Development section in the Amendment because it is a blatant violation of its duty to public transparency and the adequate protection of the environment on a site-specific basis.

162-6

In addition, Site 26 must be removed from the rezone program to have an individual EIR rather than fall under a tiered program-level EIR exemption because (1) the Amendment's proposed "monitoring program" does not have environmental impacts as stated goals, nor does the umbrella Rezone HE-1 Program, so CEQA exemption under
162-7 Guidelines § 21080.5 cannot apply, and (2) the Site does not qualify under the CEQA exemption § 21159.21(d) either. Section 21159.21(d) states:

> "The site of the project does not contain wetlands, does not have any value as a wildlife habitat, and the project does not harm any species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.) or by the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050), of Division 3 of the Fish and Game Code), and the project does not cause the destruction or removal of any species protected by a local ordinance in effect at the time the application for the project was deemed complete…"

The expedited review process incentive in the Housing Element Amendment (cited above), will violate this § 21159.21(d) because Site 26 has numerous characteristics listed above. By Placer County's own admission in the Housing Needs Rezone Program (PLN22-00476) DEIR, Appendix G, pg. 43, Site 26 supports a perennial creek, seasonal wetland, and Federally Endangered steelhead and California Species of Concern chinook salmon. There are numerous community members who will testify and have submitted public comment regarding the existence of vernal pools and a vast diversity of wildlife that is too abundant to list in this letter. Site 26 is directly adjacent and
162-8 biologically interconnected with Folsom Lake Basin, which knowingly supports California Fully Protected Species, Golden Eagle. In the cursory DEIR Appendix G, pg. 40, the analysis of the likelihood of the Golden Eagle presence on proposed sites was foolishly dismissed for Site 26 because it declared the sites were "highly fragmented" and not part of the "large expansive areas" the species requires. This may very well be true for *other* proposed rezone sites of infill character, but this is a prime example of just how significant the character of Site 26 is a departure from the rest of the rezone program. Site 26 certainly has mature trees supportive of breeding sites and is biologically and physically interconnected with the vast habitat area of Folsom Lake. Federal Take permits for the salmonoids may even be required on this property and Golden Eagles may be nesting, yet the incentives in the Housing Element Amendment mean that Site 26 is proposed to undergo no further environmental review than the skin-deep DEIR currently on record. When viewing the record as a whole, there is substantial evidence that Site 26 is highly unique and significant environmental impacts would occur if it were included in the Housing Element Amendment. As such, it must be removed from the Amendment and the rezone program.

Appendix F makes another feeble attempt to justify Site 26 as realistic or feasible by
162-9 declaring the realistic acreage is only roughly 12 acres instead of 18, but the County's analysis will not survive the scrutiny of litigation. With the above stated environmental considerations and ripeness for litigation regarding the presence of protected species,

162-9 Cont.	the likelihood of meeting the requisite developable acreage is highly debatable. The current zoning is declared a Design Scenic Corridor, and the Site is part of the Placer County Conservation Plan, which again supports substantial evidence that the Site is unique environmentally. There is no direct evidence of a site walk conducted by qualified personnel to testify to the County's findings in Appendix F. Due to the unique character of Site 26, the County's example parcels outside the District are of completely different environmental character do not substantiate the claim of 12 developable acres either. Moreover, as explained above, the County cannot rely on the HCD's guidance to provide example parcels as sufficient to meet its environmental regulatory requirements—the HCD guideline is intended to help the agency meet the HCD's allocation requirements—not to certify the rezone program's ability to survive environmentally based litigation.
162-10	Finally, I'd like to respectfully request the Board take the conservative approach to development in our county, minimize environmental damage wherever feasible, and therefore be compelled to remove Site 26 from the Housing Element Amendment and Rezone Program entirely.

Thank you for your time,

Jaclyn Freeman

Jaclyn Freeman
Granite Bay Village Community Member

LETTER 162: JACLYN FREEMAN

Response to Comment 162-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 162-2
The comment pertains to the Housing Element Amendment, which was a separate undertaking by the County and distinct from the proposed project, which would implement Program HE-1 of the adopted Housing Element. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 162-3
The comment pertains to the Housing Element Amendment, which was a separate undertaking by the County and distinct from the proposed project. On February 22, 2024, County staff presented the Draft EIR to the Planning Commission. County staff did not recommend that the Planning Commission accept the Draft EIR and staff did not provide any recommendations to the Planning Commission at that hearing; the stated purpose of the hearing noted in the staff report and during the presentation was to receive comments. The comment conflates the Housing Element requirements with CEQA. Staff is not proposing or recommending that the Board of Supervisors rely on the HCD certification to satisfy CEQA.

Response to Comment 162-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 162-2.

Response to Comment 162-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 162-2.

Response to Comment 162-6
Future projects proposed on the rezone sites would be subject to a Subsequent Conformity Review. If this review determines that a project would result in more severe impacts than identified in the Housing Rezone EIR, a focused CEQA analysis would be required to identify site-specific impacts and determine whether the impacts could be mitigated or if the project would result in significant, unavoidable impacts. Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 5 – Programmatic EIR vs. Site-Specific EIR, and Response to Comment 162-2.

Response to Comment 162-7
Please see Master Response 1 – Non-EIR/Administrative Issues and Responses to Comments 162-2 and 162-6. Pursuant to Public Resources Code Section 21080.5, State agency regulatory programs certified by the Secretary for Resources are exempt from the requirements for preparing EIRs, Negative Declarations, and Initial Studies if the Secretary finds that the program meets the criteria contained in that code section. A certified program remains subject to other provisions in CEQA such as the policy of avoiding significant adverse effects on the environment where feasible. The County is not a state agency seeking an exemption from the requirements of preparing an EIR, and an EIR has been prepared for the rezone program. The County is not seeking an exemption from CEQA pursuant to Public Resources Code Section 21159.21.

Response to Comment 162-8

Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 162-2. As described in Chapter 5, Biological Resources, of the Draft EIR, a site-specific biological resources assessment would be required for any future development proposals submitted for Rezone Site #26. The potential presence of special-status species is discussed in Chapter 5 and mitigation measures are identified to reduce any potential impacts to a less-than-significant level. Substantial evidence does not exist to conclude that Rezone Site #26 is "highly unique" and the comment does not specify how the analysis in the Draft EIR is insufficient. Rezone Site #26 is not the only undeveloped site proposed for rezone that supports mature trees, and Rezone Site #26 is surrounded by urbanized development including Cavitt Junior High School to the east, across Auburn-Folsom Road; commercial development to the north; and residential development to the east and south, across Fuller Drive.

Additionally, as clarified in the text of the BRA, the information provided on page 43 of Attachment C of the BRA is an assessment of Rezone Site #26 based on aerial photograph review. The flow duration of the creek and presence or absence of seasonal wetlands would need to be conclusively determined during a field survey of the site, as required by Mitigation Measure 5-1(a) (see page 5-61 of the Draft EIR), and subsequently confirmed by the U.S. Army Corps of Engineers (USACE), as required by Mitigation Measure 5-4(a) (see page 5-100 of the Draft EIR). Furthermore, page 43 of Attachment C of the BRA provides a list of special-status species "With Potential to Occur" within the Rezone Site #26; this is not a list of species that have been documented within the site.

The commenter does not provide any evidence to support the assertion that "Folsom Lake Basin knowingly supports California Fully Protected Species, golden eagle" or her suggestion that all of Folsom Lake is habitat for golden eagle. Golden eagle do not hunt fish or waterfowl, which are the vast majority of the prey source available within Folsom Lake. The species forages in large, expansive grasslands, which are not present within Folsom Lake. None of the databases to which Madrone has access (the California Natural Diversity Database [CNDDB], eBird, or iNaturalist) indicate that golden eagle use the lake. Only a few records are available on eBird around the lake, and information to suggest that the foregoing records are anything more than observations of golden eagles soaring overhead does not exist (similar observations have been made from urban backyards). Some marginally suitable grassland patches are present on the peninsula in Folsom Lake, approximately two miles east of the parcel, across the lake. However, the lake itself does not provide habitat for golden eagle. Furthermore, although Rezone Site #26 does appear to support oak woodlands and riparian habitat that is contiguous to other oak woodlands and riparian habitat on adjacent parcels, the rezone site does not provide large expansive grasslands. As stated on page 43 of Attachment C of the BRA, Rezone Site #26 appears to support approximately 2.8 acres of annual grassland, and 3.6 acres of oak savannah, some of which may be sufficiently open to also be considered grassland. This is a total of 6.4 acres, and the parcel is surrounded by urban residential development, commercial development, and a school on the other side of Linda Creek. None of the foregoing areas support grasslands. As such, the small area of grassland within Rezone Site #26 is indeed fragmented and is not of sufficient size to provide suitable foraging or nesting habitat for golden eagle.

With respect to federal take permits being required for special-status salmonids, Rezone Site #26 is located within the PCCP plan area, and the two salmonids are Covered Species under the PCCP. Therefore, PCCP Covered Activities on Rezone Site #26 would not require independent authorization from NMFS. The PCA has already consulted with NMFS regarding impacts to salmonids throughout the PCCP plan area, and the provisions required under that consultation are included in PCCP Species Condition 7, which is required by Mitigation Measure 5-2(j) (see page 5-75 of the Draft EIR). As noted on Page 44 of Attachment C of the BRA, this condition is expected to be required for work within Rezone Site #26. If golden eagles or any other native bird are nesting on or adjacent to the parcel, the nests would be found prior to construction during implementation of Mitigation Measure 5-2(ac) (see page 5-95 of the Draft EIR), and the nest would be avoided by a suitable buffer until the nest is not active. If a golden eagle nest is found, the nest would be protected by the federal Bald and Golden Eagle Protection Act, which is administered by the USFWS. The Bald and Golden Eagle Protection Act is not summarized in the Regulatory Context section of the Draft EIR's Biological Resources chapter, due to the lack of habitat for eagles within the rezone sites. However, if a nest is found, compliance with the Bald and Golden Eagle Protection Act would still be required.

Response to Comment 162-9

This comment is speculative as it relates to potential litigation. The PCCP area covers the entirety of West Placer County and a parcel within the boundaries of the PCCP does not mean it is a unique environmental resource, rather it means that development is subject to the permit provisions of the Program. The County is not relying on HCD guidance to certify the EIR. The Board of Supervisors is the authority in Placer County responsible for certifying EIRs. For information regarding the site's zoning, see response to Comment 40-3.

Response to Comment 162-10

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 163

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Jaclyn Freeman. I have been a homeowner and resident of Granite Bay since 2017, currently at 7213 Harbor Way. My family and I have spent 33 years at 7213 Harbor Way, enjoying its unique front door access to the beautiful and abundant natural resources across the street, specifically Regional Housing Needs Allocation proposed District 4 rezone "Site 26" (as labelled in "Appendix F: Implementation of Program HE-1 Regional Housing Needs Allocation Rezone Program" dated March 2024). Site 26 is roughly 18 acres of unique rich wildlife habitat, seasonal wetland, perennial stream, oak woodlands, and highly likely home to Federally Endangered steelhead and California Species of Concern chinook salmon as it is physically and biologically interconnected with Folsom Lake watershed and habitat. In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

As currently drafted, the Housing Element Amendment and accompanying Appendix F are ripe for litigation and must be rejected and/or redrafted to remove Site 26 because the Board is responsible for avoiding and/or minimizing environmental damage to Site 26 where feasible. It is feasible and reasonable to remove Site 26 from the rezone program and require it undergo individualized environmental assessment under its existing zoning before development.

The Placer County Board of Supervisors is the responsible agency that must ensure CEQA's requirements are met while updating the Housing Element. The Board cannot rely on the certification from the California Department of Housing and Community Development (HCD) as an approval of its environmental review requirements. In public hearing dated February 22, 2024, county staff recommended the Planning Commission accept the proposed Housing Needs Rezone Program Draft Environmental Impact Report before them because staff was relying on the letter from the HCD "certifying" the county's Housing Element submission. However, this is a misplacement of responsibility. The HCD does not certify that the Board will be insulated from

environmental review litigation. It certifies that the Board's submitted plan is in accordance with housing element guidance. The HCD's "Housing Element Update Guidance Attachment 1 Implementation Review" provides a completeness checklist including "Site Inventory and Analysis" which simply requires counties to produce a quote, "general description of environmental constraints to the development of housing." This standard of environmental review falls dramatically below the CEQA standards for assessing significant environmental impacts based upon substantial evidence in light of the record as a whole. The Board is responsible for meeting CEQA's requirements, not HCD's completeness checklist requirements. Because the Board cannot rely on HCD's certification to meet its environmental review requirements, it must remove Site 26 from the Housing Element Amendment. Simply put, Site 26 is not appropriate for inclusion in the rezone program because its unique environmental character warrants individualized conservative environmental impact assessment and does not fit the rezone program's generalized environmental circumstances of typical infill projects for which a "completeness checklist" may suffice.

Site 26 is considered a "Large Site Development" under the Housing Element. This category must be removed from the Housing Element Amendment entirely because it is outside the size parameters of the state's Regional Housing Needs Allocation site requirements and its inclusion will surely lead to litigation for the County on the grounds of CEQA and other environmental law grounds.

According to HCD's webpage on Housing Element Building Blocks Site Analysis and Zoning, available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/analysis-of-sites-and-zoning, "a parcel smaller than one half acre or over 10 acres is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible." Site 26 is roughly 18 acres and should therefore be excluded from the Housing Element Amendment.

Shockingly, the Housing Element attempts to make Site 26 appear feasible and/or realistic by including incentives for Large Site Developments on page 161b of the Housing Element Amendment. It states, "an expedited review process will be available for the subdivision of larger sites into buildable lots where the development application can be found consistent with the General Plan, applicable Specific Plan, and master environmental impact report (EIR)." This is in direct contradiction to the conversations staff and the Planning Commission had at the public hearing on February 22, 2024, whereby the public was assured that this high level Draft Environmental Impact Report (DEIR or EIR) would be followed up by site specific EIRs when particularized development proposals are submitted in the future. The Board cannot include the Large Site Development section in the Amendment because it is a blatant violation of its duty to public transparency and the adequate protection of the environment on a site-specific basis.

In addition, Site 26 must be removed from the rezone program to have an individual EIR rather than fall under a tiered program-level EIR exemption because (1) the Amendment's proposed "monitoring program" does not have environmental impacts as stated goals, nor does the umbrella Rezone HE-1 Program, so CEQA exemption under Guidelines § 21080.5 cannot apply, and (2) the Site does not qualify under the CEQA exemption § 21159.21(d) either. Section 21159.21(d) states:

> "The site of the project does not contain wetlands, does not have any value as a wildlife habitat, and the project does not harm any species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.) or by the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050), of Division 3 of the Fish and Game Code), and the project does not cause the destruction or removal of any species protected by a local ordinance in effect at the time the application for the project was deemed complete…"

The expedited review process incentive in the Housing Element Amendment (cited above), will violate this § 21159.21(d) because Site 26 has numerous characteristics listed above. By Placer County's own admission in the Housing Needs Rezone Program (PLN22-00476) DEIR, Appendix G, pg. 43, Site 26 supports a perennial creek, seasonal wetland, and Federally Endangered steelhead and California Species of Concern chinook salmon. There are numerous community members who will testify and have submitted public comment regarding the existence of vernal pools and a vast diversity of wildlife that is too abundant to list in this letter. Site 26 is directly adjacent and biologically interconnected with Folsom Lake Basin, which knowingly supports California Fully Protected Species, Golden Eagle. In the cursory DEIR Appendix G, pg. 40, the analysis of the likelihood of the Golden Eagle presence on proposed sites was foolishly dismissed for Site 26 because it declared the sites were "highly fragmented" and not part of the "large expansive areas" the species requires. This may very well be true for *other* proposed rezone sites of infill character, but this is a prime example of just how significant the character of Site 26 is a departure from the rest of the rezone program. Site 26 certainly has mature trees supportive of breeding sites and is biologically and physically interconnected with the vast habitat area of Folsom Lake. Federal Take permits for the salmonoids may even be required on this property and Golden Eagles may be nesting, yet the incentives in the Housing Element Amendment mean that Site 26 is proposed to undergo no further environmental review than the skin-deep DEIR currently on record. When viewing the record as a whole, there is substantial evidence that Site 26 is highly unique and significant environmental impacts would occur if it were included in the Housing Element Amendment. As such, it must be removed from the Amendment and the rezone program.

Appendix F makes another feeble attempt to justify Site 26 as realistic or feasible by declaring the realistic acreage is only roughly 12 acres instead of 18, but the County's analysis will not survive the scrutiny of litigation. With the above stated environmental considerations and ripeness for litigation regarding the presence of protected species,

the likelihood of meeting the requisite developable acreage is highly debatable. The current zoning is declared a Design Scenic Corridor, and the Site is part of the Placer County Conservation Plan, which again supports substantial evidence that the Site is unique environmentally. There is no direct evidence of a site walk conducted by qualified personnel to testify to the County's findings in Appendix F. Due to the unique character of Site 26, the County's example parcels outside the District are of completely different environmental character do not substantiate the claim of 12 developable acres either. Moreover, as explained above, the County cannot rely on the HCD's guidance to provide example parcels as sufficient to meet its environmental regulatory requirements—the HCD guideline is intended to help the agency meet the HCD's allocation requirements—not to certify the rezone program's ability to survive environmentally based litigation.

Finally, I'd like to respectfully request the Board take the conservative approach to development in our county, minimize environmental damage wherever feasible, and therefore be compelled to remove Site 26 from the Housing Element Amendment and Rezone Program entirely.

Thank you for your time,

Jaclyn Freeman

Jaclyn Freeman
Granite Bay Village Community Member

From: J&E Freeman
To: Kally Kedinger-Cecil; Board Clerk; Planning Commission; Suzanne Jones; Placer County Environmental Coordination Services; Frank Udvarhely
Subject: Re: COMMENT: RE Housing Element Draft Environmental Impact Report
Date: Monday, March 18, 2024 4:16:30 PM
Attachments: 030624 Letter by Jaclyn Freeman.pdf
Letter Feb 21 edited.pdf
DEIR Public Comment Freeman.pdf

Apologies, my subject line did not edit. Resending for clarity. Thanks.

To Whom It May Concern:

Please see attached letters to be included in public comment for Housing Element Draft Environmental Impact Report.

Thank you,

Jaclyn Freeman

February 21, 2024

Placer County Planning Commission
Attn.: Planning Commission Clerk
3091 County Center Dr.
Auburn, CA 95603

Dear Placer County Planning Commission:

RE: Housing Needs Rezone Program Draft Environmental Impact Report

163-1 My name is Erik Freeman. I have been a homeowner and resident of Granite Bay since 2017, currently at 7213 Harbor Way. But this community is deeply rooted in my childhood because I purchased my home from my late grandparents, Jim and Margaret Knudson, who bought it when it was built in 1989. Collectively, my family and I have spent 33 years at 7213 Harbor Way, enjoying its unique front door access to the natural resources across the street, including specific Regional Housing Needs Allocation proposed District 4 rezone "Lots 24, 25, and 26" (as labelled in "Residential Land Inventory Rezone" Board of Supervisor's Presentation on February 13, 2024.) In regard to the Housing Needs Rezone Program (PLN22-00476) Draft Environmental Impact Report, I would like to respectfully request the Planning Commission reject the report from staff on the Draft Environmental Impact Report (DEIR), reject the DEIR itself, and furthermore reject the proposed rezoning of properties, with particular emphasis on Lots 26 from their current zoning designation to Residential Multifamily 30 (RM30).

163-2 Firstly, I believe the importance of the Planning Commission and Board of Supervisors conducting an independent, thorough, and accurate Environmental Impact Report (EIR) for the purposes of Regional Housing Needs Allocation throughout the county cannot be understated, even at the program-level analysis stage. According to CEQA Guidelines § 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. Currently, the DEIR fails to ensure the administrative record sufficiently supports the lead agency's findings of no significant environmental impacts in light of the record as a whole and is therefore ripe for litigation. While a program-level analysis may be appropriate at this stage, it is not a license to easily dispose of the lead agency's duty to avoid or minimize environmental damage where feasible, or to fail to provide substantial evidence to support the lead agency's EIR findings.

Directly across the street from my community lies Proposed Rezone Lot 26, on the corner of Auburn Folsom Boulevard and Fuller Drive. Every single day I take my 2.5 year old son and dog on a walk right by Lot 26. I care deeply about the unique natural resource character of this land and its future, as my daughter was just born on February 5th of this month and she has yet to experience its fulfilling joy. My neighbors and many others drive from the surrounding areas to enjoy its beauty and the natural resources it uniquely supports on its boundaries and in adjacent areas.

163-2 Cont. For expediency, I'd like to highlight Lot 26 as an example of how the proposed rezone program will in fact cause significant environmental impacts based on the facts in the County record, thus illustrating the DEIR's gross inadequacies, and urge the Commission to reject it.

163-3 The DEIR should find there are significant environmental impacts to Aesthetics, and Lot 26 is an example of the DEIR's failure to support its findings by substantial evidence in light of the record on its whole. Section 1.5, Scope of the DEIR, *Aesthetics,* states:

> "the Planning Area of the General Plan does not contain officially designated scenic highways, corridors, vistas, or viewing areas…Therefore, development of the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway, and a less-than-significant impact would occur."

Contrary to the DEIR's statement above, current zoning of Lot 26 deems the area a "Design Scenic Corridor," (Dc), (see attached, Exhibit A, "Lot 26 Current Zone Report"). The Placer County Unincorporated Zoning Code defines Dc's under Section 17.52.070 as "areas of special natural beauty and aesthetic interest that constitute a basic resource in the county economy, the preservation of which in its most nearly natural state would enhance tourism." The County's own readily available zoning records designate scenic areas that are impacted by the rezone program. The DEIR dismisses Aesthetic impacts by declaring the State and Federal levels have not declared any areas as scenic, and mistakenly fails to address the county level facts in the record. Because the DEIR ignores known facts in the record, and facts directly contrary to a finding of less-than-significant impact are present, substantial evidence requires the Commission to reject the DEIR.

163-4 Furthermore, the DEIR should find there are significant environmental impacts to Agricultural & Forest Resources, and Lot 26 is an example of the DEIR's failure to support its findings by substantial evidence in light of the record on its whole. Section 1.5 Scope of the DEIR, *Agricultural & Forest Resources*, states:

> "A total of 12 rezone sites contain woodland habitat. However, all 12 rezone sites are located within the boundaries of the Placer County Conservation Program (PCCP)… The PCCP identifies woodland habitat as a key natural community that defines the major biological values of the PCCP. Pursuant to the PCCP, avoidance is encouraged and any impacts to woodland habitat is subject to payment of PCCP Development Fees – Land Conversion, which would fully address potential forest land/woodland impacts through off-site purchase of woodland preserves. Based on the above, the proposed project would not conflict with existing zoning for forest land or timberland and would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, a less-than-significant impact would occur."

Shockingly, the DEIR fails to inform the public which specific proposed 12 rezone sites contain woodland habitat. Not even a footnote notifies your citizens which sites in the

163-4 Cont.

County are up for effective expulsion from conservation by payment of fees and offsite woodlands in their stead. To say this would constitute sufficient mitigation for the unique natural resources at risk is a bold departure from the County's declared goals for the PCCP. Because the DEIR fails to notify the public of the subject sites, there is not an effective opportunity for public comment. These lands are deemed significant enough for inclusion in the PPCP, therefore they deserve the opportunity for the Commission to hear its citizen urging for the removal these 12 sites from the rezone program. Lot 26, the one I walk by every day with my family, is one of these 12 sites. I have attached Exhibit B, the PCCP map showing it has significant unique characteristics of Oak Woodland Savannah, Valley Foothill Riparian Woodland, a PCCP Stream System, and declared Valley Elderberry Longhorn Beetle Modeled Habitat (VELB). Yet in the face of this evidence, the DEIR declares a less-than-significant impact would occur. This is not the case.

163-5

The PCCP sites should be removed from the proposed rezone program entirely. The PCCP specifically states that "avoidance is encouraged." The DEIR effectively ignores the County's own readily available PCCP records by declaring less-than-significant impacts when forested areas are specifically included in proposed sites. If the program removed the 12 PCCP sites, its DEIR finding could possibly stand. But the DEIR cannot survive scrutiny of its less-than-significant impact finding in the face of the PCCP designations, encouragement to avoid, and supposition that the Public Trust would adequately be protected via mitigations such as development fees and offsite forest sites. The inclusion and dismissal of PCCP sites in the rezone DEIR is a prime example of the gross inadequacies of the administrative record to support the DEIR findings. Therefore, the DEIR is ripe for litigation, and must be rejected by the Commission today.

163-6

My letter today highlights just a few gaps, in just one piece of this DEIR, for just one of the proposed rezone sites in the rezone program. I strongly urge the Commission to consider the depth and width of the contents of this DEIR for the rezone program and its readiness to defend it against the scrutiny of highly motivated multi-generational community members dedicated to the wise use and conservation of our unique natural resources. Finally, I respectfully request the Commission reject the staff's report on this DEIR, reject the DEIR itself, and furthermore reject the proposed rezoning of PCCP properties, with particular emphasis on Lot 26, from their current zoning designation to Residential Multifamily 30 (RM30).

Thank you for your time,

Erik Freeman

Erik Freeman
Granite Bay Village Community Member

163-7

EXHIBIT A
LOT 26 CURRENT ZONE REPORT

2/21/24, 1:54 PM Document

8989 AUBURN FOLSOM RD,
CA 95746

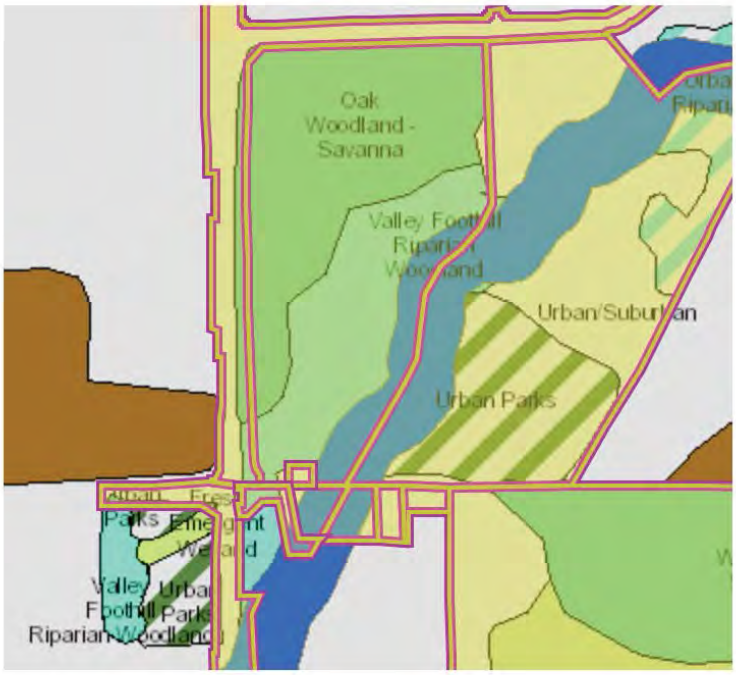


Parcel ID	047150053000
Zone	CPD
Allowed Use(s) - Primary	Residential(9), Lodging(1), Office(9), Commercial(28), Civic(5), Civic Support(2), Educational(6), Industrial(13)
Allowed Use(s) - Accessory	Residential(3),
Combining Zones	Dc (Design Scenic Corridor)
Informational Overlays	Resulting Height by average slope, PCCP Foothill, Land Coverage: Valley Foothill Riparian Woodland, Land Coverage: Urban/Suburban, Land Coverage: Oak Woodland - Savanna, Granite Bay Community Plan, Fire Severity Level: Urban Unzoned, Fire Severity Level: Moderate, Fire Protection Local Responsibility Areas (LRA), CalTrans Adjusted Urban Area
Lot Area - Public Records	-
Lot Area - GIS	762,128 ft²
Maximum Lot Coverage	50%
Residential Density	10.00 Du / Acre
Floor Area Ratio	N/A
Existing Building Area	-
Maximum Building Footprint	380,646 ft²

https://zonecheck.gridics.com/us/ca/placer-county?viewMode=map&folio=047150053000 1/2

163-7
Cont.

EXHIBIT B
LOT 26 PCCP MAP



March 18, 2024

Placer County, Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Ste 190
Auburn, CA 95603
cdraecs@placer.ca.gov

Dear Placer County Environmental Coordination Services Personnel:

RE: Housing Needs Rezone Program Draft Environmental Impact Report

Thank you for your time and consideration of the following commentary. Please feel free to reach out to me via email if you need any clarification of my comments. I have outlined my comments according to the organization of the sections of the Draft Environmental Impact Report.

163-8

1. INTRODUCTION

a. 1.6 Project Baseline:
- The baseline condition is the physical condition that exists when the NOP is published. The NOP for the proposed project was published on October 20, 2023. According to Placer County's Conservation Plan's webpage at https://www.placer.ca.gov/3362/Placer-County-Conservation-Program, citizens can access a property's "Baseline Land Cover" characteristics by searching on the maps link available at https://maps.placer.ca.gov/Html5viewer/index.html?viewer=PCCP.PCCP The PCCP Baseline Land Cover maps were published prior to October 20, 2023, therefore they are part of the County's own record as Baseline Conditions for a parcel and must therefore be included throughout the DEIR's analysis.

163-9

2. EXECUTIVE SUMMARY

a. 2.4 Summary of Project Alternatives:
- Alternatives Considered should include: (1) conservation reserve implementation such as Williams Act or other by willing property owners and (2) the County should be a willing owner to contribute County-owned property to shift development away from more environmentally sensitive parcels.
- Environmentally Superior Alternative: The DEIR should include County-owned parcels in its EIR analysis because the environmentally superior alternative is to analyze a pool of available parcels that for environmental sensitivity, and then select which are most appropriate for a high-density multifamily housing project. Essentially, until the DEIR was conducted, the County had no evidence-based environmental information upon which to base its site selection for the Housing Needs Allocation. The willingness of

163-9 Cont.

property owners does not requisite suitability for development of large multifamily projects. The County must include more County-owned sites for inclusion in the EIR analysis, so that environmentally superior alternatives can be meaningfully weighed based upon environmental factors.

163-10

b. Executive Summary Table 2-1
- §5-6 Oak Woodlands:
  - PCCP General Condition 3: If PCCP General Condition 3 applies, then oak woodlands are impacted such that a land conversion fee is likely required. The PCCP User Guide declares these activities as "permanent conversion of natural land cover." This must be considered a "significant and unavoidable impact" in the DEIR. It is misleading to consider payment of fees or donation to reserves funds a mitigation measure that results in less than a significant impact.

3. PROJECT DESCRIPTION

163-11

a. 3.3 Project Objectives:
- The project objectives should include site selection for the rezone program to factor in environmental sensitivity of parcels to determine whether they are appropriate for large multifamily development projects.

163-12

4. AIR QUALITY AND GHG EMISSIONS

- Naturally Occurring Asbestos "NOA" (pg. 4-9): ALL proposed vacant sites must be individually evaluated by a qualified biologist for naturally occurring asbestos. Our communities cannot be put at risk by the programmatic DEIR not taking into account site specific conditions. In particular, Site 26 is adjacent to a middle school whereby children are at play during the construction workday and would be at unacceptable risk if individual assessment per parcel is not required.
  - The County cannot rely on *Special Report 190: Relative Likelihood for the Presence of Naturally Occurring Asbestos in Placer County, California* prepared by the Department of Conservation for its recommendation of requiring the individual site evaluation of only a portion of the proposed rezone sites because the report specifically states as follows on pg. 14:
    > "It [the Special Report] does not indicate whether NOA minerals are present or absent in bedrock or soil associated with a particular parcel of land. The determination of the likelihood of NOA presence or absence within a parcel can only be made during a detailed site-specific examination of the property. Consequently, no representations or warranties as to the actual presence or absence of natural occurrences of asbestos at specific locations within the area covered by this map can be made."
  - Executive Summary Table 2-1 §4-3: The table must be amended to include qualified geologist evaluation of *all* proposed rezone sites that are *vacant*.

5. BIOLOGICAL RESOURCES

163-13 a. Special Status Plants:

- Special Status Plants sections throughout the entire DEIR do not specifically list the vitally important species of oaks that the County is specifically charged with protecting under the Placer County Oak Woodland Management Plan (OWMP), available at https://www.placer.ca.gov/DocumentCenter/View/9338/Oak-Woodland-Management-Plan-PDF#:~:text=The%20purpose%20of%20Placer%20County%27s,)%3B%202)%20projects%20subject%20to.

163-14

- Significant and unavoidable impacts will occur to countless oak woodland habitats throughout this rezone program whereby multifamily development projects will result in land conversion of currently forested areas. The treatment of oak woodlands throughout this DEIR is extremely weak, confusing to the public, leaves triggers of liability for the County, and inadequately protects our rapidly vanishing oak woodlands. This must be addressed throughout the DEIR, Appendix C, and Appendix G, with consistent clear language.
- See Sections 5(c), Section Appendix C(a), and Section Appendix G(b) in this comment for more in depth analysis.

163-15 b. Special Status Branchiopods:

- Wet season surveys MUST be conducted for ALL parcels containing aquatic resources/wetlands. The County must amend mitigation measure language to ensure parcels are evaluated for the presence of special status branchiopods during the wet season and prior to approving any construction permits in order to adequately prevent Federal Endangered Species Act violations and significant environmental impacts. Shockingly, DEIR language as written affords non-PCCP parcels MORE protection of aquatic resources than PCCP parcels because it does not even specifically call for assessment of wet season evaluations on PCCP parcels. This is unacceptable.
    - The County must amend mitigation measure language on pg. 5-2(d), *Placer County Conservation Program Sites, 5-2(d),* to read as follows (delete strikethrough text, add bold text):

      "If a rezone site is covered under the Placer County Conservation Program (PCCP) and supports vernal pools, ***seasonal wetlands, and/or seasonal wetland swales,*** *then PCCP Species Condition 10 shall be implemented, as follows:*
      PCCP Species Condition 10: ***Prior to County approval of any permit authorizing construction, wet-season surveys to determine occupancy of vernal pools by vernal pool fairy shrimp and vernal pool tadpole shrimp shall be required,*** ~~*Wet season surveys to determine occupancy of vernal pools by vernal pool fairy shrimp and vernal pool tadpole shrimp shall be required if the*~~

163-15 Cont.

~~proposed project is implemented while the PCCP is still in the Initial Survey Phase. The Placer Conservation Authority (PCA) shall inform the applicant if the PCCP is in the Initial Survey Phase and surveys are required. If required, wet season surveys shall be conducted for vernal pool fairy shrimp and vernal pool tadpole shrimp in vernal~~ pools, as determined by wetland delineation."

- The County must amend mitigation measure language pg. 5-72, *Sites Not Covered under Placer County Conservation Program, 5-2(f),* to read as follows (delete strikethrough text, add bold text):
  "If a rezone site is not covered under the PCCP and ~~will impact~~ ***supports*** *vernal pools, seasonal wetlands, and/or seasonal wetland swales, the provisions of this mitigation measure are required. ~~If protocol-level branchiopod surveys are not conducted or if federally listed vernal pool branchiopods are found during protocol-level wet- and dry-season surveys of the site, then prior to County approval of any permit authorizing construction, the project applicant shall consult with the USFWS regarding impacts to federally listed vernal pool branchiopods from the proposed project.~~* ***Prior to County approval of any permit authorizing construction, wet-season surveys to determine occupancy of vernal pools by vernal pool fairy shrimp and vernal pool tadpole shrimp shall be required.*** *If federally listed vernal pool branchiopods are not found during the wet- and dry-season surveys, further mitigation shall not be required. If federally listed vernal pool branchiopods are found, the project applicant shall obtain and comply with any conditions of the appropriate take authorization from the USFWS, prior to County approval of any permit authorizing construction."*

- Public commenters who have actually walked the property during the wet season at Site 26 have testified to the presence of vernal pools and submitted such commentary into the record. The County's Biological Assessment Appendix G is only based on remote data, therefore substantial evidence to the contrary of the DEIR's current assessment of Site 26 is present in the record.
  - PCCP Special Condition 10 must therefore apply to Site 26, and requires Amendment of Appendix G pg. 43-44.

163-16

c. <u>VELB</u>

- Please see explanation and analysis below in this comment at *Section Appendix C, subsection (a), Site 26 Inventory Form,* regarding the need to include VELB mapping data as Baseline Land Conditions throughout the DEIR. Amendments to Site Inventory Forms, Appendix G, Executive Summary Tables, and more may be required to adequately include this mapping data that was omitted from meaningful analysis with clarity.
- 5-2(h) PCCP Sites:
  - Special Condition 8: "Habitat features" language must maintain consistency with the Placer County Oak Woodland Management Plan (OWMP), available at https://www.placer.ca.gov/DocumentCenter/View/9338/Oak-Woodland-

Management-Plan-PDF#:~:text=The%20purpose%20of%20Placer%20County%27s,)%3B%202)%20projects%20subject%20to

163-17 Cont.

- Language used for Terrestrial Land Cover types of nomenclature throughout the DEIR create unacceptable inconsistency and lack of clarity for VELB and other sensitive plant species named in the OWMP. For example, the DEIR uses the nomenclature "Mixed Oak Woodland," "Oak Savannah," which as written, may include Valley Oaks and should therefore trigger Special Condition 8, but are not part of the nomenclature in OWMP.
- Please see more explanation and analysis below in this comment at *Section Appendix G, subsection (b), Oak Woodlands.*

APPENDIX C. SITE INVENTORY FORMS

163-18

a. Site 26 Inventory Form:

- "PCCP Land Use" list omits vital PCCP data, namely VELB habitat. According to Placer County's Conservation Plan's webpage at https://www.placer.ca.gov/3362/Placer-County-Conservation-Program, citizens can access a property's "Baseline Land Cover" characteristics by searching on the maps link available at https://maps.placer.ca.gov/Html5viewer/index.html?viewer=PCCP.PCCP
- According to such map data, PCCP Baseline Land Cover includes a specifically identifiable "layer" to show habitat for Covered Species Valley Elderberry Longhorn Beetle (VELB).
- VELB habitat must be included in the "PCCP Land Use" section of Site Inventory Form because (1) it is specifically named as a Baseline Land Cover condition under PCCP maps, and (2) this is essential because the "Site Inventory Form" sets the foundation of Baseline conditions for the County's Environmental Coordination Services Team when making recommendations on Buildable Areas of the parcels for Housing Element qualifications.
- VELB is listed as a Federally Threatened Species that is entirely dependent on the existence of its inhabitant shrub. VELB habitat covers a large swath of Site 26, as shown here from the PCCP map:



- Yet, because the Site Inventory Form omitted this Baseline data, the County's buildable area assessment in Appendix F of the Housing Element Amendment is fatally flawed. The County declares the following area would be considered buildable area:

Figure 19: Site 26 Buildable Area



163-18 Cont.

- Notice how much of the County's so called "Buildable Area" is known in the County's own available record as Federally Threatened Species' habitat. The likelihood of significant environmental impact is very high.
- The likelihood of Buildable Area being "feasible/realistic" is dramatically reduced by this Baseline Land Condition. The PCCP mitigation measures listed in the DEIR required for construction in VELB presence include a "20 ft radius of avoidance" and no insecticide for "100 ft." The ability to build let alone manage a multifamily housing project without applying insecticide is non-existent.
- The County provides no direct evidence of a qualified biologist conducting an on-site analysis to substantiate its "Buildable Area" claim, nor is the entire DEIR based on anything but remote data and literature analysis. Therefore, the

PCCP's Baseline Land Condition must stand as substantial evidence to support presence data for VELB in the area.

- VELB habitat removal will result in significant environmental impact, likely requiring Federal Take Permits, and therefore its presence warrants individual environmental impact assessment. Removal of Site 26 from the rezone program is required because it is inappropriate to analyze such an environmentally sensitive site under a programmatic EIR that did not even include VELB mapping data as a Baseline Land Condition in its assessment.

163-18 Cont.

b. Site 26 Nearest Transit Location:

- Site 26 Inventory Form states as follows: "Eureka Rd & Sierra College Blvd (WB), Roseville (3.4 miles, 59min walk, 6min car)"
- This description is unclear and inadequate because public commentary has requested clear identification of transit location. What is "WB"? An address for each transit stop must be provided, including a clear description of the type of transit available at the location, the times of frequency of the transit, the cost to ride, and the availability of parking at the location (without traffic violation risk) as the property is not within walkable distance of transit.

163-19

c. Site 26 Floodplain Zone: AE

- What data is the county using to support its assertion that it this is an AE floodplain zone?
- This area is identified in the County's own record in DEIR Appendix G "Biological Resources Assessment" as containing "Seasonal Wetlands." The likelihood of flooding is significantly more than 1% (AE level), rather akin to 100% in fact, if a parcel becomes a wetland on an annual basis seasonally.

163-20

APPENDIX G. BIOLOGICAL RESOURCES ASSESSMENT

a. Appendix G, Table 4 Special Species in Western County Parcels:

- *ALL "Potential for Occurrence"* explanations including reasoning that parcels are "highly fragmented" and "not part of the large expansive open areas the species needs to forage" are misleading and false.
    - Site 26 is directly adjacent and biologically interconnected with wildlife corridors and riparian corridors with Folsom Lake watershed and habitat. It supports species that require large habitat areas because it is not an infill parcel. It is not appropriate to include it in a programmatic EIR for just this reason. It is biologically unique and should be assessed individually. It supports a vast series of birds and wildlife and is frequented by our community members who have submitted public testimony of substantial evidence of the diversity of wildlife including wetlands and vernal pools.
    - Therefore, the following species presence data must be address specifically for Site 26: golden eagle, short-eared owl, northern harrier, California horned lark, loggerhead shrike, and American badger.

163-21

b. Oak Woodlands:

The following comments are all pertain to Site 26, pg. 45-46, in particular, but may have general application across other site assessments as well.

- Site 26 Terrestrial Land Cover Types are stated as follows: annual grassland, mixed oak woodland, oak savannah, and willow riparian. These Terrestrial Land Cover Types are highly misleading because they are not in accordance with the habitat descriptions according to the Placer County Oak Woodland Management Plan (OWMP), available at https://www.placer.ca.gov/DocumentCenter/View/9338/Oak-Woodland-Management-Plan-PDF#:~:text=The%20purpose%20of%20Placer%20County%27s,)%3B%202)%20projects%20subject%20to. For example, the OWMP describes Valley Oak Woodlands as ranging from savannah-like to forest-like stands. Appendix G identifies some parcel sites as having the presence of Valley Oak Woodlands, but does not on others.
    - What exactly determines the labeling of Savannah Oak, Mixed Oak Woodland, Willow Riparian, versus Valley Oak Woodlands or Valley Foothill Riparian? (I understand the assessment is made via GIS data. But what exact quantifications are underpinning your labeling format?)
- In particular, Site 26 has savannah oaks that may support valley oaks, but the County has avoided declaring certain Community Conditions by using the misleading language of "Savannah Oak" and "Mixed Oak Woodland." As written, such descriptions' definitions certainly allow for the presence of Valley Oaks.
- The OWMP declares the "conservation priority is to avoid direct and indirect impacts on this precious resource." A significant portion of the Figure 19 "Buildable Area" is Valley Foothill Riparian Woodland (see images below from PCCP map & Figure 19 below). Offsite mitigation is not appropriate for this unique habitat corridor that supports Folsom Lake wildlife. In addition, the County is charged with prioritizing the protection of oak woodlands in the OWMP. The OWMP emphasizes avoiding impacts "particularly when they are part of larger unfragmented woodlands or connected to other unfragmented ecological landscape."
    - Site 26 is interconnected with the Folsom Lake watershed and habitat through unimpeded wildlife corridors and Linda Creek. Site 26 does in fact have acorn producing, mature oaks, throughout the parcel, which site specific analysis would show. Site 26 should have triggered DEIR Appendix G pg. 96, Section 6.2.2.12 Community Condition 3, Valley Oak Woodland Avoidance and Minimization, and Mitigation Measures which requires development activities do not allow irrigation in and around the valley oak woodland, including an onsite sewage disposal system are prohibited in order to ensure the trees receive no additional water. A multifamily housing project *cannot* be built without an irrigation system and/or sewage system.

- In addition, it has Valley Foothill Riparian Woodlands according to PCCP Baseline Land Cover Conditions maps available at https://maps.placer.ca.gov/Html5viewer/index.html?viewer=PCCP.PCCP. This site condition must also be added to Appendix G's analysis and nomenclature.

- Again, the misleading characterization of Site 26's Baseline Land Cover Conditions regarding oak woodlands resulted in a fundamentally unsound Buildable Area assessment in Housing Element Amendment Appendix F, Figure 19. Specifically, the purportedly Buildable Area is covered in conservation-worthy oak woodlands according to the County's own record in the PCCP Baseline Land Conditions map. This is substantial evidence against the feasibility of the proposed development on Figure 19 below. This rezone would be a blatant violation of the OWMP's goals to conserve oak woodlands, increase oak woodland acreage in the County, restore sites that are adjacent to high quality habitat, and more. Instead, the County should be identifying Site 26 as a prime habitat restoration and conservation site due its unique biological characteristics and connectivity to Folsom Lake habitat.

163-21 Cont.



Figure 19: Site 26 Buildable Area



- Finally, the Terrestrial Land Cover Types utilized in Figure 19 above are *wholly inconsistent* with the Placer County Oak Woodland Management Plan, thereby

163-21 Cont.

creating further inconsistency and unacceptable misleading of the public. The DEIR must therefore be amended to have nomenclature that is consistent with PCCP and OWMP and DEIR Appendixes, and/or conservatively assume Valley Oak and Valley Foothill Riparian Oak woodlands are triggered at every oak woodland, in the event on-site determination by qualified personnel is not conducted to substantiate an assertion of non-presence of such sensitive species.

Thank you for your time and consideration,

Jaclyn Freeman

Jaclyn Freeman
Granite Bay Village Community Member

LETTER 163: JACLYN FREEMAN

Response to Comment 163-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 163-2
The Draft EIR determined that the proposed project would have potentially significant environmental impacts. However, the Draft EIR identifies mitigation measures to reduce the majority of potential impacts to a less-than-significant level. Furthermore, the Board of Supervisors would consider, as required by CEQA, Findings of Fact for any significant impacts and a Statement of Overriding Considerations for any significant and unavoidable impacts identified in the Draft EIR. Please see Chapter 2, Executive Summary, of the Draft EIR, for a table of the project's mitigation measures and Chapter 11, Statutorily Required Sections, of the Draft EIR for a discussion of the project's significant and unavoidable impacts.

Response to Comment 163-3
With respect to the zoning of Rezone Site #26, please see Response to Comment 40-3 and Section I, Aesthetics, of the Initial Study prepared for the proposed project (attached as Appendix A to the Draft EIR).

Response to Comment 163-4
A Biological Resource Assessment (BRA) was prepared for the rezone program (please see Appendix G of the Draft EIR). The BRA details the existing conditions of the rezone sites, including habitat types found on the sites, including oak woodlands. Please see page 43 of the BRA for a detailed description of the on-site habitats potentially found on Rezone Site #26. Rezone Site #26 is located within the Potential Future Growth (PFG) area of the PCCP, and payment of land conversion fees is an acceptable method of mitigating oak woodland impacts under the PCCP land conversion framework. Oak woodland avoidance and minimization is achieved during site design review, and future projects located on the rezone sites within the PCCP boundaries would be required to comply with the PCCP conditions identified in the Mitigation Monitoring Reporting Program, including Mitigation Measure 5-6(b) (see Chapter 2, Executive Summary, of the Draft EIR, which includes a table of all the mitigation measures with which future projects would be required to comply). Mitigation Measure 5-6(b) requires compliance with PCCP General Condition 3, which requires payment of land conversion fees.

Response to Comment 163-5
The requirements of the PCCP are detailed in Chapter 5, Biological Resources, of the Draft EIR, as well as the BRA prepared for the proposed project (please see Appendix G of the Draft EIR).

Response to Comment 163-6
The Board of Supervisors has the ultimate authority to rezone properties in the unincorporated areas of Placer County.

Response to Comment 163-7
These are exhibits to the above comments.

Response to Comment 163-8

As discussed on page 1-18 of the Draft EIR, according to CEQA Guidelines Section 15126.2(a), an EIR must identify and focus on the significant environmental effects of a project. In assessing the impact of a project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the NOP is published. In the case of the proposed project, the NOP was published on October 20, 2023. Therefore, conditions existing at that time, including the PCCP land covers in effect at the time of the NOP's publishing, are considered to be the baseline against which changes resulting from the proposed project are evaluated in the Draft EIR.

As noted on page 16 of the BRA, the following datasets were reviewed and utilized to develop terrestrial and aquatic land cover/vegetation community maps, stream system boundary estimates, and Placer County watercourse setback estimates:

- Google Earth imagery, including current and historical aerial imagery as well as Street View (Google Earth 2023);
- Placer County PCCP Land Cover and PCCP Stream System layers (Placer County 2023);
- LiDAR Imagery for Placer County (3DEP 2023);
- FEMA floodplain linework (FEMA 2023);
- CDFW Vegetation Classification and Mapping Data (Klein, et. al. 2007, NSPDC 2023); and
- CDFW's Wildlife Habitat Relationships Layer (CDFW 2021).

The land cover maps prepared for the BRA used PCCP baseline cover map information.

Additionally, as discussed on page 5-59 of the Draft EIR, the PCCP land cover and stream system layers were reviewed and used, among other data sources, to complete the remote sensing mapping conducted as part of the BRA. The remote sensing mapping allowed Marone to develop terrestrial and aquatic land cover/vegetation community maps, stream system boundary estimates, and Placer County watercourse setback estimates, against which potential environmental impacts were identified in the Biological Resources chapter of the Draft EIR.

Response to Comment 163-9

The Housing Element identifies 406 lower-income units on the Placer County Government Center in North Auburn. Parcels in unincorporated Placer County enrolled into Williamson Act contracts are agricultural properties that are subject to contracts between the granting jurisdiction and the property owners. The foregoing contracts restrict development rights, but provide tax incentives for agricultural property owners in the form of reduced property taxes to incentivize the long-term integrity of the State's agricultural resources. As described in Section 17.64.010 of the Placer County Zoning Ordinance: Establishment of Williamson Act Land Program, the purpose of the program is "to protect agricultural lands for the continued production of agricultural lands for the continued production of agricultural commodities, and to protect certain other lands devoted to open-space uses, in compliance with the Williamson Act." Properties enrolled into Williamson Act contracts are not available for inclusion in the rezone program, because they are under restrictive development contracts, are used for active agricultural enterprises, are far from resources and in rural areas, and do not satisfy the HCD guidelines for inclusion in a RHNA site inventory.

Additionally, as discussed on page 12-4 of the Draft EIR, the requirement that an EIR evaluate alternatives to a proposed project or alternatives to the location of a project is a broad one. The

primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained, while reducing the magnitude of, or avoiding, one or more of the significant environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the CEQA Guidelines require the EIR to "set forth only those alternatives necessary to permit a reasoned choice." As stated in CEQA Guidelines Section 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice (see CEQA Guidelines Section 15126.6[a]). The intent of the project alternatives chosen for the Draft EIR was to develop alternatives to the proposed project that would accomplish most of the basic project objectives while avoiding or lessening the potential impacts of the proposed project.

The alternatives suggested by the commenter would not achieve the project objectives, and thus, are infeasible. For instance, conservation reserves would not facilitate development of affordable housing. In addition, as discussed in page 12-6 of the Draft EIR, publicly owned lands were evaluated within Appendix D of the Placer County Housing Strategy and Development Plan, Housing Opportunity Site Evaluation Tool. In considering sites potentially available for future development, the objectives of the proposed project and development feasibility were used to assess the suitability of available sites. While some publicly owned sites were ranked highly by the Site Evaluation Tool, such sites were not considered for the rezone due to either existing development on the site, being owned by other public agencies other than Placer County, or being too small unless aggregated with an adjacent site. As demonstrated in Chapter 12, Alternatives Analysis, of the Draft EIR, the selected project alternatives allow for meaningful evaluation, analysis, and comparison with the proposed project. As such, the analyses and conclusions in the Draft EIR of project alternatives are adequate.

Please also see Master Response 3 – County-Owned Sites.

Response to Comment 163-10

As discussed on page 5-109 of the Draft EIR under Impact 5-6, project impacts occurring through development of rezone sites covered under the PCCP would require payment of land cover conversion fees to the PCA (through PCCP General Condition 3) for impacts to any natural land cover including oak woodlands, oak savannah, annual grasslands, etc. Land conversion fees do not simply go into a fund, but are utilized by the PCA to purchase and preserve the same acreage of a converted land cover type at an off-site location. The PCCP contains provisions requiring the PCA to replace impacted habitat within a stated time frame. As a result, although impacts to the habitat would be considered a significant impact, participation in the PCCP and payment of the land conversion fee mitigates those impacts to a less-than-significant level.

Response to Comment 163-11

The purpose of the Draft EIR is to identify the potential physical environmental impacts of the proposed project. This comment does not clarify what is meant by "environmental sensitivity of parcels."

The Draft EIR evaluates the environmental sensitivity of all potential rezone sites and identifies potential impacts that could occur as a result of the proposed project. Where a potentially significant impact is identified, the Draft EIR sets forth mitigation measures to reduce the potential

impact. In cases when the potential impact cannot be reduced to a less-than-significant level, the Draft EIR discloses such information.

Response to Comment 163-12

As stated in the Draft EIR, Naturally Occurring Asbestos (NOA), is often found in ultramafic or serpentine rock formations, and is present in several foothill areas of Placer County. When this material is disturbed, asbestos fibers may be released, becoming airborne, and thereby creating a potential health hazard. Geologic maps prepared by the California Geologic Survey (formerly the California Division of Mines and Geology) show areas of higher probability for asbestos-containing rock within the broad zone of faults that follows the low foothills and lay in a south-east to north-west band. The Placer County communities of Auburn, Colfax, Meadow Vista, and Foresthill are among those that are within this fault band.

The identification of locations in Placer County that have the potential to contain NOA has been improved with the development of an enhanced 1:100,000 scale map by the California Geological Survey. This map denotes areas of Placer County that are more or less likely to contain NOA based on available soil and geologic studies, with some field verification. The enhanced map and accompanying report, Special Report 190, are available at the California Geological Survey website. Enlarged maps have been prepared for different areas of Placer County where NOA may be found. These maps are available on the County's NOA Maps and Resources page.

A project located in an area mapped as "Most Likely" to contain or "High NOA" zone, is subject to the requirements of Placer County Air Pollution Control District's Rule 228: Fugitive Dust, as well as the California Air Resources Board (CARB) Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations.

For projects with a disturbed surface area less than or equal to one acre, and in an area "Most Likely" to contain NOA or "High NOA" zone, dust controls must be implemented at the start and maintained throughout the duration of the activity. The foregoing standards also apply in all areas where NOA, ultramafic rock, or serpentine rock is discovered after the initiation of earth-disturbing activities, and must be implemented within 24 hours of discovery.

For projects with a disturbed area of greater than one acre, and in an area "Most Likely" to contain NOA or "High NOA" zone, an Asbestos Dust Mitigation Plan (ADMP) must be prepared and submitted to the District for review and approval before a grading permit will be issued. Once approved, the ADMP must be implemented at the start and maintained throughout the duration of activities. The requirement for an ADMP also applies when NOA, ultramafic rock, or serpentine rock is discovered after the initiation of earth-disturbing activities, and must be submitted to the Placer County Air Pollution Control District within 14 days of discovery.

Chapter 4, Air Quality and Greenhouse Gas Emissions, of the Draft EIR discusses rezone sites that have the potential to support NOA (see page 4-9 of the Draft EIR). Mitigation Measure 4-3 requires that prior to approval of improvement plans for the future development of Rezone Sites #34 through #36, #42, #43, #49, #51, #56 through #67, and #70 through #73, a qualified geologist or geotechnical engineer be retained to conduct additional site evaluations to determine the presence of asbestos. If asbestos is found, the measure describes further requirements including submittal of an ADMP to the Placer County Air Pollution Control District and compliance with CARB regulations.

The air quality analysis presented in the Draft EIR followed standard procedures related to air quality analysis pursuant to relevant CEQA thresholds, and the County considered the results of the analysis to be valid and appropriate. The mitigation measures are adequate to mitigate impacts and the Draft EIR clearly identifies those areas where measures cannot reduce impacts to less-than-significant.

The comment letter does not provide evidence of NOA on Rezone Site #26 and the Draft EIR will not be revised in response to the comment.

Response to Comment 163-13

Oak woodlands do not fall under the category of special-status plants.

Response to Comment 163-14

The Interim Guidelines for Evaluating Development Impacts on Oak Woodland (Interim Guidelines) are the County's current oak woodland mitigation policy. The Interim Guidelines and the PCCP are complementary documents, each requiring essentially equivalent mitigation. The difference between the two is that the PCCP has mandates regarding timing of habitat replacement, and due to the regional scale, the habitat purchased is often larger parcels with greater habitat connectivity.

Please see Response to Comment 146-10.

Response to Comment 163-15

The provisions within the PCCP were developed by an Interagency Review Team comprised of Placer County and other local agencies, the USFWS, the NMFS, and CDFW, all of whom are signatories to the document. As a result, the conditions required by the PCCP cannot be changed for any project; they apply to all Covered Activities throughout the PCCP plan area and have been developed based on a regionwide program being applied uniformly.

Additionally, as clarified in the text of the BRA, the information provided on page 43 of BRA Attachment C is an assessment of the Rezone Site #26 based on aerial photograph review. The presence or absence of seasonal wetlands would need to be conclusively determined during a field survey of the site, as required by Mitigation Measure 5-1(a) (see page 5-61 of the Draft EIR) and subsequently confirmed by the USACE, as required by Mitigation Measure 5-4(a) (see page 5-100 of the Draft EIR). If vernal pools are indeed present, as asserted by the commenter, those would be documented during this survey effort.

Page 5-72 of the Draft EIR will not be revised in response to the commenter's recommended text revisions for rezone sites not covered under the PCCP. Mitigation Measure 5-2(f), as written, allows a project proponent to assume presence of vernal pool branchiopods and mitigate in accordance with that assumption, which could result in more mitigation for vernal pool branchiopods. Furthermore, the commenter suggests that habitat should be surveyed even if potential impacts to that habitat are not proposed; this could result in the requirement of surveys that the USFWS would not require, rendering them superfluous.

Rezone sites outside of the PCCP boundaries are east of State Route (SR) 49 in Auburn, and rezone sites outside of the PCCP are above the elevation boundaries of branchiopods.

Response to Comment 163-16

As detailed in the BRA (attached as Appendix G to the Draft EIR), the biological resources analysis was conducted at a programmatic level. As a result, Section 6.0, Mitigation for Potential Impacts to Sensitive Biological Resources, of the BRA includes the following:

> All parcels must comply with [Mitigation Measure 5-1(a) on page 5-61 of the Draft EIR]. Additional required mitigation measures will be based on which sensitive biological resources (including aquatic resources and special-status species) are documented within the parcel, or have the potential to occur within the parcel. We have provided a summary of the sensitive biological resources that may be present and mitigation measures for impacts to those resources for each parcel in Attachments C and D [of the BRA], but a final list will be developed as part of [Mitigation Measure 5-1(a) of the Draft EIR].

Implementation of Mitigation Measure 5-1(a) of the Draft EIR requires a field survey of the rezone site proposed for development, during which any special-status species habitat must be documented. This would include noting whether or not elderberry shrubs occur within said rezone site.

It should be noted that VELB refers to the beetle, not the elderberry shrub. Elderberry shrubs are in fact quite common, while the beetle is uncommon.

Land cover nomenclature within the Draft EIR is specifically selected to correspond to nomenclature in the PCCP for rezone sites within the PCCP plan area. The habitat descriptions on page 5-5 of the Draft EIR acknowledge that Valley oaks could occur within any of the oak woodland or savannah types, but if Valley oaks are dominant, then the habitat would be considered Valley oak woodland. The presence of a single Valley oak tree does not render the entire habitat patch Valley oak woodland. As noted above, if a project is ultimately proposed on a rezone site, the habitat must be accurately mapped during the field survey required, as part of implementation of Mitigation Measure 5-1(a) of the Draft EIR.

Response to Comment 163-17

The VELB habitat polygons available on the Placer County website are based on preliminary land cover mapping that was done at a much coarser scale than the analysis conducted as part of the BRA prepared for the proposed project. Furthermore, those polygons merely show areas within which one must survey for elderberry shrubs, the exclusive host for the VELB. The polygon is not indicative of the presence of elderberry shrubs. Baseline Land Cover Mapping was developed using aerial photo interpretation for gaining Resource Agency Approval of the PCCP, and can be used to suggest habitats that may be present within a parcel. However, as the commenter notes, using aerial analysis alone to determine whether habitat is present is imprecise. Therefore, as noted above, one of the requirements of the PCCP application is generating land cover and species habitat mapping (including mapping elderberry shrubs) based on actual conditions on-site; such is what is required by Mitigation Measure 5-1(a) on page 5-61 of the Draft EIR. Furthermore, the PCCP contains provisions for impacts to elderberry shrubs within PCCP Species Condition 8 – Valley Elderberry Longhorn Beetle (which is required by Mitigation Measure 5-2[h] on page 5-73 of the Draft EIR). The presence of a "VELB Habitat Polygon" or elderberry shrubs does not preclude development in a given area, although applicants are certainly encouraged to avoid elderberry shrubs whenever possible. Lastly, VELB is a Covered Species under the PCCP, and as a result, a separate federal take permit is not required for Covered Activities that participate in the PCCP.

Response to Comment 163-18

This comment is describing the Site Inventory Forms, which were prepared to provide an overview of the rezone sites. The forms were provided for informational purposes only and are not required by CEQA. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 163-19

Data regarding floodplains is derived from the Federal Emergency Management Agency (FEMA). A wetland and floodplain are not the same aquatic feature and the presence of a wetland does not mean that a rezone site is within a floodplain. A wetland is an area that is wet either year-round or seasonally, near or at the ground surface. A floodplain refers to the land adjacent to bodies of water, such as lakes, rivers, and streams, which may be periodically covered by flood water. The comment letter does not provide evidence the floodplain information from FEMA is inadequate.

Response to Comment 163-20

As noted above, Rezone Site #26 is indeed fragmented, as the rezone site is almost entirely surrounded by urban residential and commercial development and a school. Rezone Site #26 is contiguous to a corridor of oak woodlands and riparian habitat, but as explained elsewhere in the BRA and Draft EIR, all of the species the commenter refers to (golden eagle, short-eared owl, northern harrier, California horned lark, loggerhead shrike, and American badger) require very large areas of uninterrupted grasslands or similar grassy habitats with relatively few trees. Only 6.4 acres of annual grassland and oak savannah combined occur within Rezone Site #26, and larger grasslands do not occur within adjacent parcels. Thus, this habitat patch is not of sufficient size to support the foregoing species.

Furthermore, the suggestion that all discussions in the Draft EIR on the potential for occurrence of various special-status species are “misleading and false” is speculative, as the claim does not include evidence beyond citing the commenter’s views on Rezone Site #26. CEQA does not require an EIR to evaluate speculation.

Response to Comment 163-21

As noted above, the land cover types listed for Rezone Site #26 are consistent with the nomenclature required by the PCCP, which is the regulatory mechanism applicable to the rezone site. The PCCP overrides the OWMP for Covered Activities within the PCCP plan area. As previously discussed, the habitat descriptions on page 5-5 Draft EIR acknowledge that Valley oak could occur within any of the oak woodland or savannah types, but if Valley oaks are dominant, then the habitat would be considered Valley oak woodland. The presence of a single Valley oak tree does not render the entire habitat patch Valley oak woodland.

Rezone Site #26 and the surrounding area have all been identified as PFG area by the PCCP, as opposed to Reserve Acquisition Area. This is due to the fragmentation of habitat; the PCCP targets primarily properties that are at least 200 acres in aggregate size, which are rare in urban areas such as that surrounding Rezone Site #26. Some areas within the PFG will still be set aside, particularly those within the Stream System, as continuous preserved corridors along waterways is one of the major goals of the PCCP.

Letter 164

From: J&E Freeman
To: Kally Kedinger-Cecil; Board Clerk; Planning Commission; Suzanne Jones; Placer County Environmental Coordination Services; Frank Udvarhely
Subject: Re: COMMENT: RE Housing Element Amendment March 2024
Date: Monday, March 18, 2024 4:16:42 PM
Attachments: DEIR Public Comment_Freeman.pdf
Letter Feb 21_edited.pdf
030624 Letter by Jaclyn Freeman.pdf

To Whom It May Concern:

Please see attached letters to be included in public comment for Housing Element Draft Environmental Impact Report.

Thank you,

Jaclyn Freeman

164-1

On Wed, Mar 6, 2024 at 7:51 PM J&E Freeman <lynrikfree@gmail.com> wrote:

> To Whom It May Concern:
>
> Please see attached letter to be included in public comment for Housing Element Amendment March 2024
>
> Thank you,
>
> Jaclyn Freeman

March 18, 2024

Placer County, Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Ste 190
Auburn, CA 95603
cdraecs@placer.ca.gov

Dear Placer County Environmental Coordination Services Personnel:

RE: Housing Needs Rezone Program Draft Environmental Impact Report

164-2 Thank you for your time and consideration of the following commentary. Please feel free to reach out to me via email if you need any clarification of my comments. I have outlined my comments according to the organization of the sections of the Draft Environmental Impact Report.

1. **INTRODUCTION**

   a. 1.6 Project Baseline:
      - The baseline condition is the physical condition that exists when the NOP is published. The NOP for the proposed project was published on October 20, 2023. According to Placer County's Conservation Plan's webpage at https://www.placer.ca.gov/3362/Placer-County-Conservation-Program, citizens can access a property's "Baseline Land Cover" characteristics by searching on the maps link available at https://maps.placer.ca.gov/Html5viewer/index.html?viewer=PCCP.PCCP The PCCP Baseline Land Cover maps were published prior to October 20, 2023, therefore they are part of the County's own record as Baseline Conditions for a parcel and must therefore be included throughout the DEIR's analysis.

164-3

2. **EXECUTIVE SUMMARY**

   a. 2.4 Summary of Project Alternatives:
      - Alternatives Considered should include: (1) conservation reserve implementation such as Williams Act or other by willing property owners and (2) the County should be a willing owner to contribute County-owned property to shift development away from more environmentally sensitive parcels.
      - Environmentally Superior Alternative: The DEIR should include County-owned parcels in its EIR analysis because the environmentally superior alternative is to analyze a pool of available parcels that for environmental sensitivity, and then select which are most appropriate for a high-density multifamily housing project. Essentially, until the DEIR was conducted, the County had no evidence-based environmental information upon which to base its site selection for the Housing Needs Allocation. The willingness of

164-4

164-5

I64-5 cont.

property owners does not requisite suitability for development of large multifamily projects. The County must include more County-owned sites for inclusion in the EIR analysis, so that environmentally superior alternatives can be meaningfully weighed based upon environmental factors.

I64-6

b. Executive Summary Table 2-1
   - §5-6 Oak Woodlands:
     - PCCP General Condition 3: If PCCP General Condition 3 applies, then oak woodlands are impacted such that a land conversion fee is likely required. The PCCP User Guide declares these activities as "permanent conversion of natural land cover." This must be considered a "significant and unavoidable impact" in the DEIR. It is misleading to consider payment of fees or donation to reserves funds a mitigation measure that results in less than a significant impact.

3. PROJECT DESCRIPTION

I64-7

a. 3.3 Project Objectives:
   - The project objectives should include site selection for the rezone program to factor in environmental sensitivity of parcels to determine whether they are appropriate for large multifamily development projects.

4. AIR QUALITY AND GHG EMISSIONS

I64-8

- Naturally Occurring Asbestos "NOA" (pg. 4-9): ALL proposed vacant sites must be individually evaluated by a qualified biologist for naturally occurring asbestos. Our communities cannot be put at risk by the programmatic DEIR not taking into account site specific conditions. In particular, Site 26 is adjacent to a middle school whereby children are at play during the construction workday and would be at unacceptable risk if individual assessment per parcel is not required.
  - The County cannot rely on *Special Report 190: Relative Likelihood for the Presence of Naturally Occurring Asbestos in Placer County, California* prepared by the Department of Conservation for its recommendation of requiring the individual site evaluation of only a portion of the proposed rezone sites because the report specifically states as follows on pg. 14:
    > "It [the Special Report] does not indicate whether NOA minerals are present or absent in bedrock or soil associated with a particular parcel of land. The determination of the likelihood of NOA presence or absence within a parcel can only be made during a detailed site-specific examination of the property. Consequently, no representations or warranties as to the actual presence or absence of natural occurrences of asbestos at specific locations within the area covered by this map can be made."

I64-9

  - Executive Summary Table 2-1 §4-3: The table must be amended to include qualified geologist evaluation of *all* proposed rezone sites that are *vacant*.

5. BIOLOGICAL RESOURCES

a. Special Status Plants:

- Special Status Plants sections throughout the entire DEIR do not specifically list the vitally important species of oaks that the County is specifically charged with protecting under the Placer County Oak Woodland Management Plan (OWMP), available at https://www.placer.ca.gov/DocumentCenter/View/9338/Oak-Woodland-Management-Plan-PDF#:~:text=The%20purpose%20of%20Placer%20County%27s,)%3B%202)%20projects%20subject%20to. 164-10
- Significant and unavoidable impacts will occur to countless oak woodland habitats throughout this rezone program whereby multifamily development projects will result in land conversion of currently forested areas. The treatment of oak woodlands throughout this DEIR is extremely weak, confusing to the public, leaves triggers of liability for the County, and inadequately protects our rapidly vanishing oak woodlands. This must be addressed throughout the DEIR, Appendix C, and Appendix G, with consistent clear language. 164-11
- See Sections 5(c), Section Appendix C(a), and Section Appendix G(b) in this comment for more in depth analysis. 164-12

b. Special Status Branchiopods:

- Wet season surveys MUST be conducted for ALL parcels containing aquatic resources/wetlands. The County must amend mitigation measure language to ensure parcels are evaluated for the presence of special status branchiopods during the wet season and prior to approving any construction permits in order to adequately prevent Federal Endangered Species Act violations and significant environmental impacts. Shockingly, DEIR language as written affords non-PCCP parcels MORE protection of aquatic resources than PCCP parcels because it does not even specifically call for assessment of wet season evaluations on PCCP parcels. This is unacceptable. 164-13
    - The County must amend mitigation measure language on pg. 5-2(d), *Placer County Conservation Program Sites, 5-2(d),* to read as follows (delete strikethrough text, add bold text):

      "If a rezone site is covered under the Placer County Conservation Program (PCCP) and supports vernal pools, ***seasonal wetlands, and/or seasonal wetland swales,*** *then PCCP Species Condition 10 shall be implemented, as follows:*
      PCCP Species Condition 10: ***Prior to County approval of any permit authorizing construction, wet-season surveys to determine occupancy of vernal pools by vernal pool fairy shrimp and vernal pool tadpole shrimp shall be required,*** ~~*Wet-season surveys to determine occupancy of vernal pools by vernal pool fairy shrimp and vernal pool tadpole shrimp shall be required if the*~~

164-13 cont.

~~*proposed project is implemented while the PCCP is still in the Initial Survey Phase. The Placer Conservation Authority (PCA) shall inform the applicant if the PCCP is in the Initial Survey Phase and surveys are required. If required, wet season surveys shall be conducted for vernal pool fairy shrimp and vernal pool tadpole shrimp in vernal*~~ *pools, as determined by wetland delineation."*

- The County must amend mitigation measure language pg. 5-72, *Sites Not Covered under Placer County Conservation Program, 5-2(f),* to read as follows (delete strikethrough text, add bold text):
  "If a rezone site is not covered under the PCCP and ~~*will impact*~~ ***supports*** *vernal pools, seasonal wetlands, and/or seasonal wetland swales, the provisions of this mitigation measure are required.* ~~*If protocol-level branchiopod surveys are not conducted or if federally listed vernal pool branchiopods are found during protocol-level wet- and dry-season surveys of the site, then prior to County approval of any permit authorizing construction, the project applicant shall consult with the USFWS regarding impacts to federally listed vernal pool branchiopods from the proposed project.*~~ ***Prior to County approval of any permit authorizing construction, wet-season surveys to determine occupancy of vernal pools by vernal pool fairy shrimp and vernal pool tadpole shrimp shall be required.*** *If federally listed vernal pool branchiopods are not found during the wet- and dry-season surveys, further mitigation shall not be required. If federally listed vernal pool branchiopods are found, the project applicant shall obtain and comply with any conditions of the appropriate take authorization from the USFWS, prior to County approval of any permit authorizing construction."*

164-14

- Public commenters who have actually walked the property during the wet season at Site 26 have testified to the presence of vernal pools and submitted such commentary into the record. The County's Biological Assessment Appendix G is only based on remote data, therefore substantial evidence to the contrary of the DEIR's current assessment of Site 26 is present in the record.
  - PCCP Special Condition 10 must therefore apply to Site 26, and requires Amendment of Appendix G pg. 43-44.

c. <u>VELB</u>

164-15

- Please see explanation and analysis below in this comment at *Section Appendix C, subsection (a), Site 26 Inventory Form,* regarding the need to include VELB mapping data as Baseline Land Conditions throughout the DEIR. Amendments to Site Inventory Forms, Appendix G, Executive Summary Tables, and more may be required to adequately include this mapping data that was omitted from meaningful analysis with clarity.

164-16

- 5-2(h) PCCP Sites:
  - Special Condition 8: "Habitat features" language must maintain consistency with the Placer County Oak Woodland Management Plan (OWMP), available at https://www.placer.ca.gov/DocumentCenter/View/9338/Oak-Woodland-

Management-Plan-PDF#:~:text=The%20purpose%20of%20Placer%20County%27s,)%3B%202)%20projects%20subject%20to

- Language used for Terrestrial Land Cover types of nomenclature throughout the DEIR create unacceptable inconsistency and lack of clarity for VELB and other sensitive plant species named in the OWMP. For example, the DEIR uses the nomenclature "Mixed Oak Woodland," "Oak Savannah," which as written, may include Valley Oaks and should therefore trigger Special Condition 8, but are not part of the nomenclature in OWMP.
- Please see more explanation and analysis below in this comment at *Section Appendix G, subsection (b), Oak Woodlands.*

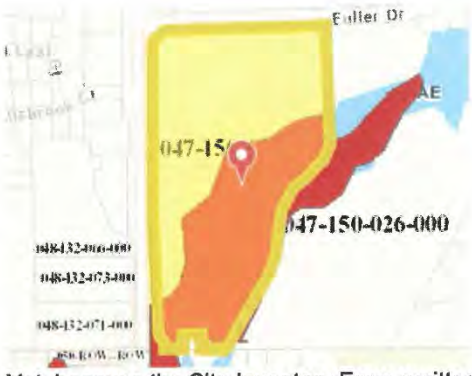
164-17

APPENDIX C. SITE INVENTORY FORMS

a. Site 26 Inventory Form:

- "PCCP Land Use" list omits vital PCCP data, namely VELB habitat. According to Placer County's Conservation Plan's webpage at https://www.placer.ca.gov/3362/Placer-County-Conservation-Program, citizens can access a property's "Baseline Land Cover" characteristics by searching on the maps link available at https://maps.placer.ca.gov/Html5viewer/index.html?viewer=PCCP.PCCP
- According to such map data, PCCP Baseline Land Cover includes a specifically identifiable "layer" to show habitat for Covered Species Valley Elderberry Longhorn Beetle (VELB).
- VELB habitat must be included in the "PCCP Land Use" section of Site Inventory Form because (1) it is specifically named as a Baseline Land Cover condition under PCCP maps, and (2) this is essential because the "Site Inventory Form" sets the foundation of Baseline conditions for the County's Environmental Coordination Services Team when making recommendations on Buildable Areas of the parcels for Housing Element qualifications.
- VELB is listed as a Federally Threatened Species that is entirely dependent on the existence of its inhabitant shrub. VELB habitat covers a large swath of Site 26, as shown here from the PCCP map:

164-18



- Yet, because the Site Inventory Form omitted this Baseline data, the County's buildable area assessment in Appendix F of the Housing Element Amendment is fatally flawed. The County declares the following area would be considered buildable area:

Figure 19: Site 26 Buildable Area



164-18 Cont.

- Notice how much of the County's so called "Buildable Area" is known in the County's own available record as Federally Threatened Species' habitat. The likelihood of significant environmental impact is very high.
- The likelihood of Buildable Area being "feasible/realistic" is dramatically reduced by this Baseline Land Condition. The PCCP mitigation measures listed in the DEIR required for construction in VELB presence include a "20 ft radius of avoidance" and no insecticide for "100 ft." The ability to build let alone manage a multifamily housing project without applying insecticide is non-existent.
- The County provides no direct evidence of a qualified biologist conducting an on-site analysis to substantiate its "Buildable Area" claim, nor is the entire DEIR based on anything but remote data and literature analysis. Therefore, the

PCCP's Baseline Land Condition must stand as substantial evidence to support presence data for VELB in the area.

- VELB habitat removal will result in significant environmental impact, likely requiring Federal Take Permits, and therefore its presence warrants individual environmental impact assessment. Removal of Site 26 from the rezone program is required because it is inappropriate to analyze such an environmentally sensitive site under a programmatic EIR that did not even include VELB mapping data as a Baseline Land Condition in its assessment.

164-18 cont.

b. Site 26 Nearest Transit Location:
   - Site 26 Inventory Form states as follows: "Eureka Rd & Sierra College Blvd (WB), Roseville (3.4 miles, 59min walk, 6min car)"
   - This description is unclear and inadequate because public commentary has requested clear identification of transit location. What is "WB"? An address for each transit stop must be provided, including a clear description of the type of transit available at the location, the times of frequency of the transit, the cost to ride, and the availability of parking at the location (without traffic violation risk) as the property is not within walkable distance of transit.

164-19

c. Site 26 Floodplain Zone: AE
   - What data is the county using to support its assertion that it this is an AE floodplain zone?
   - This area is identified in the County's own record in DEIR Appendix G "Biological Resources Assessment" as containing "Seasonal Wetlands." The likelihood of flooding is significantly more than 1% (AE level), rather akin to 100% in fact, if a parcel becomes a wetland on an annual basis seasonally.

164-20

APPENDIX G. BIOLOGICAL RESOURCES ASSESSMENT

a. Appendix G, Table 4 Special Species in Western County Parcels:
   - *ALL "Potential for Occurrence"* explanations including reasoning that parcels are "highly fragmented" and "not part of the large expansive open areas the species needs to forage" are misleading and false.
     - Site 26 is directly adjacent and biologically interconnected with wildlife corridors and riparian corridors with Folsom Lake watershed and habitat. It supports species that require large habitat areas because it is not an infill parcel. It is not appropriate to include it in a programmatic EIR for just this reason. It is biologically unique and should be assessed individually. It supports a vast series of birds and wildlife and is frequented by our community members who have submitted public testimony of substantial evidence of the diversity of wildlife including wetlands and vernal pools.
     - Therefore, the following species presence data must be address specifically for Site 26: golden eagle, short-eared owl, northern harrier, California horned lark, loggerhead shrike, and American badger.

164-21

b. Oak Woodlands:

The following comments are all pertain to Site 26, pg. 45-46, in particular, but may have general application across other site assessments as well.

- Site 26 Terrestrial Land Cover Types are stated as follows: annual grassland, mixed oak woodland, oak savannah, and willow riparian. These Terrestrial Land Cover Types are highly misleading because they are not in accordance with the habitat descriptions according to the Placer County Oak Woodland Management Plan (OWMP), available at https://www.placer.ca.gov/DocumentCenter/View/9338/Oak-Woodland-Management-Plan-PDF#:~:text=The%20purpose%20of%20Placer%20County%27s,)%3B%202)%20projects%20subject%20to. For example, the OWMP describes Valley Oak Woodlands as ranging from savannah-like to forest-like stands. Appendix G identifies some parcel sites as having the presence of Valley Oak Woodlands, but does not on others.
    - What exactly determines the labeling of Savannah Oak, Mixed Oak Woodland, Willow Riparian, versus Valley Oak Woodlands or Valley Foothill Riparian? (I understand the assessment is made via GIS data. But what exact quantifications are underpinning your labeling format?)
- In particular, Site 26 has savannah oaks that may support valley oaks, but the County has avoided declaring certain Community Conditions by using the misleading language of "Savannah Oak" and "Mixed Oak Woodland." As written, such descriptions' definitions certainly allow for the presence of Valley Oaks.
- The OWMP declares the "conservation priority is to avoid direct and indirect impacts on this precious resource." A significant portion of the Figure 19 "Buildable Area" is Valley Foothill Riparian Woodland (see images below from PCCP map & Figure 19 below). Offsite mitigation is not appropriate for this unique habitat corridor that supports Folsom Lake wildlife. In addition, the County is charged with prioritizing the protection of oak woodlands in the OWMP. The OWMP emphasizes avoiding impacts "particularly when they are part of larger unfragmented woodlands or connected to other unfragmented ecological landscape."
    - Site 26 is interconnected with the Folsom Lake watershed and habitat through unimpeded wildlife corridors and Linda Creek. Site 26 does in fact have acorn producing, mature oaks, throughout the parcel, which site specific analysis would show. Site 26 should have triggered DEIR Appendix G pg. 96, Section 6.2.2.12 Community Condition 3, Valley Oak Woodland Avoidance and Minimization, and Mitigation Measures which requires development activities do not allow irrigation in and around the valley oak woodland, including an onsite sewage disposal system are prohibited in order to ensure the trees receive no additional water. A multifamily housing project *cannot* be built without an irrigation system and/or sewage system.

16A-22

- In addition, it has Valley Foothill Riparian Woodlands according to PCCP Baseline Land Cover Conditions maps available at https://maps.placer.ca.gov/Html5viewer/index.html?viewer=PCCP.PCCP. This site condition must also be added to Appendix G's analysis and nomenclature.

- Again, the misleading characterization of Site 26's Baseline Land Cover Conditions regarding oak woodlands resulted in a fundamentally unsound Buildable Area assessment in Housing Element Amendment Appendix F, Figure 19. Specifically, the purportedly Buildable Area is covered in conservation-worthy oak woodlands according to the County's own record in the PCCP Baseline Land Conditions map. This is substantial evidence against the feasibility of the proposed development on Figure 19 below. This rezone would be a blatant violation of the OWMP's goals to conserve oak woodlands, increase oak woodland acreage in the County, restore sites that are adjacent to high quality habitat, and more. Instead, the County should be identifying Site 26 as a prime habitat restoration and conservation site due its unique biological characteristics and connectivity to Folsom Lake habitat.

164-22 cont

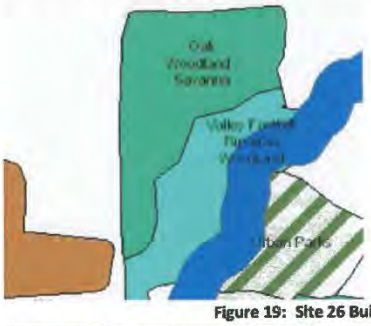
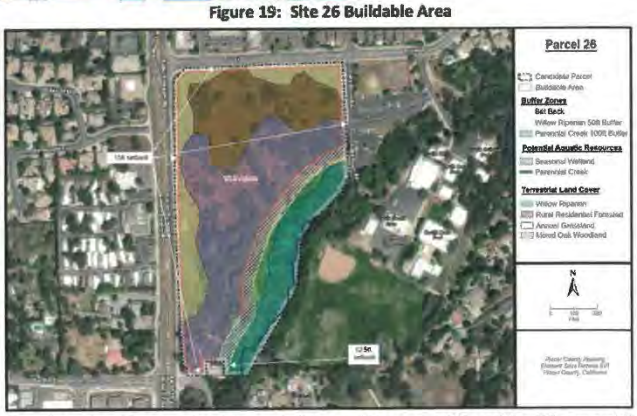


Figure 19: Site 26 Buildable Area



- Finally, the Terrestrial Land Cover Types utilized in Figure 19 above are *wholly inconsistent* with the Placer County Oak Woodland Management Plan, thereby

164-22 Cont.

creating further inconsistency and unacceptable misleading of the public. The DEIR must therefore be amended to have nomenclature that is consistent with PCCP and OWMP and DEIR Appendixes, and/or conservatively assume Valley Oak and Valley Foothill Riparian Oak woodlands are triggered at every oak woodland, in the event on-site determination by qualified personnel is not conducted to substantiate an assertion of non-presence of such sensitive species.

164-23

Thank you for your time and consideration,

Jaclyn Freeman

Jaclyn Freeman
Granite Bay Village Community Member

February 21, 2024

Placer County Planning Commission
Attn.: Planning Commission Clerk
3091 County Center Dr.
Auburn, CA 95603

Dear Placer County Planning Commission:

RE: Housing Needs Rezone Program Draft Environmental Impact Report

My name is Erik Freeman. I have been a homeowner and resident of Granite Bay since 2017, currently at 7213 Harbor Way. But this community is deeply rooted in my childhood because I purchased my home from my late grandparents, Jim and Margaret Knudson, who bought it when it was built in 1989. Collectively, my family and I have spent 33 years at 7213 Harbor Way, enjoying its unique front door access to the natural resources across the street, including specific Regional Housing Needs Allocation proposed District 4 rezone "Lots 24, 25, and 26" (as labelled in "Residential Land Inventory Rezone" Board of Supervisor's Presentation on February 13, 2024.) In regard to the Housing Needs Rezone Program (PLN22-00476) Draft Environmental Impact Report, I would like to respectfully request the Planning Commission reject the report from staff on the Draft Environmental Impact Report (DEIR), reject the DEIR itself, and furthermore reject the proposed rezoning of properties, with particular emphasis on Lots 26 from their current zoning designation to Residential Multifamily 30 (RM30).

I64-24

Firstly, I believe the importance of the Planning Commission and Board of Supervisors conducting an independent, thorough, and accurate Environmental Impact Report (EIR) for the purposes of Regional Housing Needs Allocation throughout the county cannot be understated, even at the program-level analysis stage. According to CEQA Guidelines § 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. Currently, the DEIR fails to ensure the administrative record sufficiently supports the lead agency's findings of no significant environmental impacts in light of the record as a whole and is therefore ripe for litigation. While a program-level analysis may be appropriate at this stage, it is not a license to easily dispose of the lead agency's duty to avoid or minimize environmental damage where feasible, or to fail to provide substantial evidence to support the lead agency's EIR findings.

Directly across the street from my community lies Proposed Rezone Lot 26, on the corner of Auburn Folsom Boulevard and Fuller Drive. Every single day I take my 2.5 year old son and dog on a walk right by Lot 26. I care deeply about the unique natural resource character of this land and its future, as my daughter was just born on February 5th of this month and she has yet to experience its fulfilling joy. My neighbors and many others drive from the surrounding areas to enjoy its beauty and the natural resources it uniquely supports on its boundaries and in adjacent areas.

For expediency, I'd like to highlight Lot 26 as an example of how the proposed rezone program will in fact cause significant environmental impacts based on the facts in the County record, thus illustrating the DEIR's gross inadequacies, and urge the Commission to reject it.

The DEIR should find there are significant environmental impacts to Aesthetics, and Lot 26 is an example of the DEIR's failure to support its findings by substantial evidence in light of the record on its whole. Section 1.5, Scope of the DEIR, *Aesthetics,* states:

> "the Planning Area of the General Plan does not contain officially designated scenic highways, corridors, vistas, or viewing areas…Therefore, development of the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway, and a less-than-significant impact would occur."

Contrary to the DEIR's statement above, current zoning of Lot 26 deems the area a "Design Scenic Corridor," (Dc), (see attached, Exhibit A, "Lot 26 Current Zone Report"). The Placer County Unincorporated Zoning Code defines Dc's under Section 17.52.070 as "areas of special natural beauty and aesthetic interest that constitute a basic resource in the county economy, the preservation of which in its most nearly natural state would enhance tourism." The County's own readily available zoning records designate scenic areas that are impacted by the rezone program. The DEIR dismisses Aesthetic impacts by declaring the State and Federal levels have not declared any areas as scenic, and mistakenly fails to address the county level facts in the record. Because the DEIR ignores known facts in the record, and facts directly contrary to a finding of less-than-significant impact are present, substantial evidence requires the Commission to reject the DEIR.

164-24 Cont.

Furthermore, the DEIR should find there are significant environmental impacts to Agricultural & Forest Resources, and Lot 26 is an example of the DEIR's failure to support its findings by substantial evidence in light of the record on its whole. Section 1.5 Scope of the DEIR, *Agricultural & Forest Resources*, states:

> "A total of 12 rezone sites contain woodland habitat. However, all 12 rezone sites are located within the boundaries of the Placer County Conservation Program (PCCP)… The PCCP identifies woodland habitat as a key natural community that defines the major biological values of the PCCP. Pursuant to the PCCP, avoidance is encouraged and any impacts to woodland habitat is subject to payment of PCCP Development Fees – Land Conversion, which would fully address potential forest land/woodland impacts through off-site purchase of woodland preserves. Based on the above, the proposed project would not conflict with existing zoning for forest land or timberland and would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, a less-than-significant impact would occur."

Shockingly, the DEIR fails to inform the public which specific proposed 12 rezone sites contain woodland habitat. Not even a footnote notifies your citizens which sites in the

County are up for effective expulsion from conservation by payment of fees and offsite woodlands in their stead. To say this would constitute sufficient mitigation for the unique natural resources at risk is a bold departure from the County's declared goals for the PCCP. Because the DEIR fails to notify the public of the subject sites, there is not an effective opportunity for public comment. These lands are deemed significant enough for inclusion in the PPCP, therefore they deserve the opportunity for the Commission to hear its citizen urging for the removal these 12 sites from the rezone program. Lot 26, the one I walk by every day with my family, is one of these 12 sites. I have attached Exhibit B, the PCCP map showing it has significant unique characteristics of Oak Woodland Savannah, Valley Foothill Riparian Woodland, a PCCP Stream System, and declared Valley Elderberry Longhorn Beetle Modeled Habitat (VELB). Yet in the face of this evidence, the DEIR declares a less-than-significant impact would occur. This is not the case.

The PCCP sites should be removed from the proposed rezone program entirely. The PCCP specifically states that "avoidance is encouraged." The DEIR effectively ignores the County's own readily available PCCP records by declaring less-than-significant impacts when forested areas are specifically included in proposed sites. If the program removed the 12 PCCP sites, its DEIR finding could possibly stand. But the DEIR cannot survive scrutiny of its less-than-significant impact finding in the face of the PCCP designations, encouragement to avoid, and supposition that the Public Trust would adequately be protected via mitigations such as development fees and offsite forest sites. The inclusion and dismissal of PCCP sites in the rezone DEIR is a prime example of the gross inadequacies of the administrative record to support the DEIR findings. Therefore, the DEIR is ripe for litigation, and must be rejected by the Commission today.

My letter today highlights just a few gaps, in just one piece of this DEIR, for just one of the proposed rezone sites in the rezone program. I strongly urge the Commission to consider the depth and width of the contents of this DEIR for the rezone program and its readiness to defend it against the scrutiny of highly motivated multi-generational community members dedicated to the wise use and conservation of our unique natural resources. Finally, I respectfully request the Commission reject the staff's report on this DEIR, reject the DEIR itself, and furthermore reject the proposed rezoning of PCCP properties, with particular emphasis on Lot 26, from their current zoning designation to Residential Multifamily 30 (RM30).

16-24 cont.

Thank you for your time,

Erik Freeman

Erik Freeman
Granite Bay Village Community Member

EXHIBIT A
LOT 26 CURRENT ZONE REPORT

164-24 Cont.

2/21/24, 1:54 PM Document

8989 AUBURN FOLSOM RD,
CA 95746

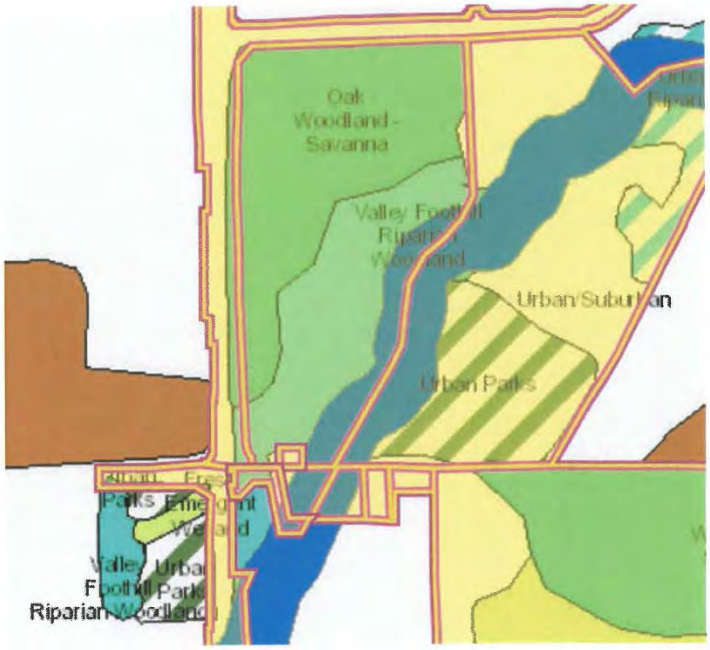


Parcel ID	047150053000
Zone	CPD
Allowed Use(s) - Primary	Residential(9), Lodging(1), Office(9), Commercial(28), Civic(5), Civic Support(2), Educational(6), Industrial(13)
Allowed Use(s) - Accessory	Residential(3),
Combining Zones	Dc (Design Scenic Corridor)
Informational Overlays	Resulting Height by average slope, PCCP Foothill, Land Coverage: Valley Foothill Riparian Woodland, Land Coverage: Urban/Suburban, Land Coverage: Oak Woodland - Savanna, Granite Bay Community Plan, Fire Severity Level: Urban Unzoned, Fire Severity Level: Moderate, Fire Protection Local Responsibility Areas (LRA), CalTrans Adjusted Urban Area
Lot Area - Public Records	-
Lot Area - GIS	762,128 ft²
Maximum Lot Coverage	50%
Residential Density	10.00 Du / Acre
Floor Area Ratio	N/A
Existing Building Area	-
Maximum Building Footprint	380,646 ft²

https://zonecheck.gridics.com/us/ca/placer-county?viewMode=map&folio=047150053000 1/2

164-24 cont.

EXHIBIT B
LOT 26 PCCP MAP



March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Jaclyn Freeman. I have been a homeowner and resident of Granite Bay since 2017, currently at 7213 Harbor Way. My family and I have spent 33 years at 7213 Harbor Way, enjoying its unique front door access to the beautiful and abundant natural resources across the street, specifically Regional Housing Needs Allocation proposed District 4 rezone "Site 26" (as labelled in "Appendix F: Implementation of Program HE-1 Regional Housing Needs Allocation Rezone Program" dated March 2024). Site 26 is roughly 18 acres of unique rich wildlife habitat, seasonal wetland, perennial stream, oak woodlands, and highly likely home to Federally Endangered steelhead and California Species of Concern chinook salmon as it is physically and biologically interconnected with Folsom Lake watershed and habitat. In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

I64-25

As currently drafted, the Housing Element Amendment and accompanying Appendix F are ripe for litigation and must be rejected and/or redrafted to remove Site 26 because the Board is responsible for avoiding and/or minimizing environmental damage to Site 26 where feasible. It is feasible and reasonable to remove Site 26 from the rezone program and require it undergo individualized environmental assessment under its existing zoning before development.

The Placer County Board of Supervisors is the responsible agency that must ensure CEQA's requirements are met while updating the Housing Element. The Board cannot rely on the certification from the California Department of Housing and Community Development (HCD) as an approval of its environmental review requirements. In public hearing dated February 22, 2024, county staff recommended the Planning Commission accept the proposed Housing Needs Rezone Program Draft Environmental Impact Report before them because staff was relying on the letter from the HCD "certifying" the county's Housing Element submission. However, this is a misplacement of responsibility. The HCD does not certify that the Board will be insulated from

environmental review litigation. It certifies that the Board's submitted plan is in accordance with housing element guidance. The HCD's "Housing Element Update Guidance Attachment 1 Implementation Review" provides a completeness checklist including "Site Inventory and Analysis" which simply requires counties to produce a quote, "general description of environmental constraints to the development of housing." This standard of environmental review falls dramatically below the CEQA standards for assessing significant environmental impacts based upon substantial evidence in light of the record as a whole. The Board is responsible for meeting CEQA's requirements, not HCD's completeness checklist requirements. Because the Board cannot rely on HCD's certification to meet its environmental review requirements, it must remove Site 26 from the Housing Element Amendment. Simply put, Site 26 is not appropriate for inclusion in the rezone program because its unique environmental character warrants individualized conservative environmental impact assessment and does not fit the rezone program's generalized environmental circumstances of typical infill projects for which a "completeness checklist" may suffice.

Site 26 is considered a "Large Site Development" under the Housing Element. This category must be removed from the Housing Element Amendment entirely because it is outside the size parameters of the state's Regional Housing Needs Allocation site requirements and its inclusion will surely lead to litigation for the County on the grounds of CEQA and other environmental law grounds.

164-25 cont.

According to HCD's webpage on Housing Element Building Blocks Site Analysis and Zoning, available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/analysis-of-sites-and-zoning, "a parcel smaller than one half acre or over 10 acres is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible." Site 26 is roughly 18 acres and should therefore be excluded from the Housing Element Amendment.

Shockingly, the Housing Element attempts to make Site 26 appear feasible and/or realistic by including incentives for Large Site Developments on page 161b of the Housing Element Amendment. It states, "an expedited review process will be available for the subdivision of larger sites into buildable lots where the development application can be found consistent with the General Plan, applicable Specific Plan, and master environmental impact report (EIR)." This is in direct contradiction to the conversations staff and the Planning Commission had at the public hearing on February 22, 2024, whereby the public was assured that this high level Draft Environmental Impact Report (DEIR or EIR) would be followed up by site specific EIRs when particularized development proposals are submitted in the future. The Board cannot include the Large Site Development section in the Amendment because it is a blatant violation of its duty to public transparency and the adequate protection of the environment on a site-specific basis.

In addition, Site 26 must be removed from the rezone program to have an individual EIR rather than fall under a tiered program-level EIR exemption because (1) the Amendment's proposed "monitoring program" does not have environmental impacts as stated goals, nor does the umbrella Rezone HE-1 Program, so CEQA exemption under Guidelines § 21080.5 cannot apply, and (2) the Site does not qualify under the CEQA exemption § 21159.21(d) either. Section 21159.21(d) states:

> "The site of the project does not contain wetlands, does not have any value as a wildlife habitat, and the project does not harm any species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.) or by the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050), of Division 3 of the Fish and Game Code), and the project does not cause the destruction or removal of any species protected by a local ordinance in effect at the time the application for the project was deemed complete…"

164-25 cont.

The expedited review process incentive in the Housing Element Amendment (cited above), will violate this § 21159.21(d) because Site 26 has numerous characteristics listed above. By Placer County's own admission in the Housing Needs Rezone Program (PLN22-00476) DEIR, Appendix G, pg. 43, Site 26 supports a perennial creek, seasonal wetland, and Federally Endangered steelhead and California Species of Concern chinook salmon. There are numerous community members who will testify and have submitted public comment regarding the existence of vernal pools and a vast diversity of wildlife that is too abundant to list in this letter. Site 26 is directly adjacent and biologically interconnected with Folsom Lake Basin, which knowingly supports California Fully Protected Species, Golden Eagle. In the cursory DEIR Appendix G, pg. 40, the analysis of the likelihood of the Golden Eagle presence on proposed sites was foolishly dismissed for Site 26 because it declared the sites were "highly fragmented" and not part of the "large expansive areas" the species requires. This may very well be true for *other* proposed rezone sites of infill character, but this is a prime example of just how significant the character of Site 26 is a departure from the rest of the rezone program. Site 26 certainly has mature trees supportive of breeding sites and is biologically and physically interconnected with the vast habitat area of Folsom Lake. Federal Take permits for the salmonoids may even be required on this property and Golden Eagles may be nesting, yet the incentives in the Housing Element Amendment mean that Site 26 is proposed to undergo no further environmental review than the skin-deep DEIR currently on record. When viewing the record as a whole, there is substantial evidence that Site 26 is highly unique and significant environmental impacts would occur if it were included in the Housing Element Amendment. As such, it must be removed from the Amendment and the rezone program.

Appendix F makes another feeble attempt to justify Site 26 as realistic or feasible by declaring the realistic acreage is only roughly 12 acres instead of 18, but the County's analysis will not survive the scrutiny of litigation. With the above stated environmental considerations and ripeness for litigation regarding the presence of protected species,

the likelihood of meeting the requisite developable acreage is highly debatable. The current zoning is declared a Design Scenic Corridor, and the Site is part of the Placer County Conservation Plan, which again supports substantial evidence that the Site is unique environmentally. There is no direct evidence of a site walk conducted by qualified personnel to testify to the County's findings in Appendix F. Due to the unique character of Site 26, the County's example parcels outside the District are of completely different environmental character do not substantiate the claim of 12 developable acres either. Moreover, as explained above, the County cannot rely on the HCD's guidance to provide example parcels as sufficient to meet its environmental regulatory requirements—the HCD guideline is intended to help the agency meet the HCD's allocation requirements—not to certify the rezone program's ability to survive environmentally based litigation.

I4-25 cont.

Finally, I'd like to respectfully request the Board take the conservative approach to development in our county, minimize environmental damage wherever feasible, and therefore be compelled to remove Site 26 from the Housing Element Amendment and Rezone Program entirely.

Thank you for your time,

Jaclyn Freeman

Jaclyn Freeman
Granite Bay Village Community Member

LETTER 164: JACLYN FREEMAN

Response to Comment 164-1
Please see Responses to Comment Letters 162 and 163, and Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 164-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 164-3
Please see Response to Comment 163-8.

Response to Comment 164-4
Please see Response to Comment 163-9.

Response to Comment 164-5
Please see Response to Comment 163-9.

Response to Comment 164-6
Please see Response to Comment 163-10.

Response to Comment 164-7
Please see Response to Comment 163-11.

Response to Comment 164-8
Please see Response to Comment 163-12.

Response to Comment 164-9
Please see Response to Comment 163-12.

Response to Comment 164-10
Please see Response to Comment 163-13.

Response to Comment 164-11
Please see Response to Comment 163-14.

Response to Comment 164-12
Please see Response to Comment 163-14.

Response to Comment 164-13
Please see Response to Comment 163-15.

Response to Comment 164-14
Please see Response to Comment 163-15.

Response to Comment 164-15
Please see Response to Comment 163-16.

Response to Comment 164-16
Please see Response to Comment 163-16.

Response to Comment 164-17
Please see Response to Comment 163-16.

Response to Comment 164-18
Please see Response to Comment 163-18.

Response to Comment 164-19
Please see Response to Comment 163-18.

Response to Comment 164-20
Please see Response to Comment 163-19.

Response to Comment 164-21
Please see Response to Comment 163-20.

Response to Comment 164-22
Please see Response to Comment 163-21.

Response to Comment 164-23
The comment is a conclusion statement and does not address the adequacy of the Draft EIR.

Response to Comment 164-24
Please see Responses to Comment 163-1 through 163-7.

Response to Comment 164-25
Please see Responses to Comment Letter 162.

Letter 165

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Jaclyn Freeman. I have been a homeowner and resident of Granite Bay since 2017, currently at 7213 Harbor Way. My family and I have spent 33 years at 7213 Harbor Way, enjoying its unique front door access to the beautiful and abundant natural resources across the street, specifically Regional Housing Needs Allocation proposed District 4 rezone "Site 26" (as labelled in "Appendix F: Implementation of Program HE-1 Regional Housing Needs Allocation Rezone Program" dated March 2024). Site 26 is roughly 18 acres of unique rich wildlife habitat, seasonal wetland, perennial stream, oak woodlands, and highly likely home to Federally Endangered steelhead and California Species of Concern chinook salmon as it is physically and biologically interconnected with Folsom Lake watershed and habitat. In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

165-1

As currently drafted, the Housing Element Amendment and accompanying Appendix F are ripe for litigation and must be rejected and/or redrafted to remove Site 26 because the Board is responsible for avoiding and/or minimizing environmental damage to Site 26 where feasible. It is feasible and reasonable to remove Site 26 from the rezone program and require it undergo individualized environmental assessment under its existing zoning before development.

The Placer County Board of Supervisors is the responsible agency that must ensure CEQA's requirements are met while updating the Housing Element. The Board cannot rely on the certification from the California Department of Housing and Community Development (HCD) as an approval of its environmental review requirements. In public hearing dated February 22, 2024, county staff recommended the Planning Commission accept the proposed Housing Needs Rezone Program Draft Environmental Impact Report before them because staff was relying on the letter from the HCD "certifying" the county's Housing Element submission. However, this is a misplacement of responsibility. The HCD does not certify that the Board will be insulated from

environmental review litigation. It certifies that the Board's submitted plan is in accordance with housing element guidance. The HCD's "Housing Element Update Guidance Attachment 1 Implementation Review" provides a completeness checklist including "Site Inventory and Analysis" which simply requires counties to produce a quote, "general description of environmental constraints to the development of housing." This standard of environmental review falls dramatically below the CEQA standards for assessing significant environmental impacts based upon substantial evidence in light of the record as a whole. The Board is responsible for meeting CEQA's requirements, not HCD's completeness checklist requirements. Because the Board cannot rely on HCD's certification to meet its environmental review requirements, it must remove Site 26 from the Housing Element Amendment. Simply put, Site 26 is not appropriate for inclusion in the rezone program because its unique environmental character warrants individualized conservative environmental impact assessment and does not fit the rezone program's generalized environmental circumstances of typical infill projects for which a "completeness checklist" may suffice.

165-1 cont.

Site 26 is considered a "Large Site Development" under the Housing Element. This category must be removed from the Housing Element Amendment entirely because it is outside the size parameters of the state's Regional Housing Needs Allocation site requirements and its inclusion will surely lead to litigation for the County on the grounds of CEQA and other environmental law grounds.

According to HCD's webpage on Housing Element Building Blocks Site Analysis and Zoning, available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/analysis-of-sites-and-zoning, "a parcel smaller than one half acre or over 10 acres is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible." Site 26 is roughly 18 acres and should therefore be excluded from the Housing Element Amendment.

Shockingly, the Housing Element attempts to make Site 26 appear feasible and/or realistic by including incentives for Large Site Developments on page 161b of the Housing Element Amendment. It states, "an expedited review process will be available for the subdivision of larger sites into buildable lots where the development application can be found consistent with the General Plan, applicable Specific Plan, and master environmental impact report (EIR)." This is in direct contradiction to the conversations staff and the Planning Commission had at the public hearing on February 22, 2024, whereby the public was assured that this high level Draft Environmental Impact Report (DEIR or EIR) would be followed up by site specific EIRs when particularized development proposals are submitted in the future. The Board cannot include the Large Site Development section in the Amendment because it is a blatant violation of its duty to public transparency and the adequate protection of the environment on a site-specific basis.

In addition, Site 26 must be removed from the rezone program to have an individual EIR rather than fall under a tiered program-level EIR exemption because (1) the Amendment's proposed "monitoring program" does not have environmental impacts as stated goals, nor does the umbrella Rezone HE-1 Program, so CEQA exemption under Guidelines § 21080.5 cannot apply, and (2) the Site does not qualify under the CEQA exemption § 21159.21(d) either. Section 21159.21(d) states:

> "The site of the project does not contain wetlands, does not have any value as a wildlife habitat, and the project does not harm any species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.) or by the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050), of Division 3 of the Fish and Game Code), and the project does not cause the destruction or removal of any species protected by a local ordinance in effect at the time the application for the project was deemed complete…"

165-1 cont.

The expedited review process incentive in the Housing Element Amendment (cited above), will violate this § 21159.21(d) because Site 26 has numerous characteristics listed above. By Placer County's own admission in the Housing Needs Rezone Program (PLN22-00476) DEIR, Appendix G, pg. 43, Site 26 supports a perennial creek, seasonal wetland, and Federally Endangered steelhead and California Species of Concern chinook salmon. There are numerous community members who will testify and have submitted public comment regarding the existence of vernal pools and a vast diversity of wildlife that is too abundant to list in this letter. Site 26 is directly adjacent and biologically interconnected with Folsom Lake Basin, which knowingly supports California Fully Protected Species, Golden Eagle. In the cursory DEIR Appendix G, pg. 40, the analysis of the likelihood of the Golden Eagle presence on proposed sites was foolishly dismissed for Site 26 because it declared the sites were "highly fragmented" and not part of the "large expansive areas" the species requires. This may very well be true for *other* proposed rezone sites of infill character, but this is a prime example of just how significant the character of Site 26 is a departure from the rest of the rezone program. Site 26 certainly has mature trees supportive of breeding sites and is biologically and physically interconnected with the vast habitat area of Folsom Lake. Federal Take permits for the salmonoids may even be required on this property and Golden Eagles may be nesting, yet the incentives in the Housing Element Amendment mean that Site 26 is proposed to undergo no further environmental review than the skin-deep DEIR currently on record. When viewing the record as a whole, there is substantial evidence that Site 26 is highly unique and significant environmental impacts would occur if it were included in the Housing Element Amendment. As such, it must be removed from the Amendment and the rezone program.

Appendix F makes another feeble attempt to justify Site 26 as realistic or feasible by declaring the realistic acreage is only roughly 12 acres instead of 18, but the County's analysis will not survive the scrutiny of litigation. With the above stated environmental considerations and ripeness for litigation regarding the presence of protected species,

165-1 cont.

the likelihood of meeting the requisite developable acreage is highly debatable. The current zoning is declared a Design Scenic Corridor, and the Site is part of the Placer County Conservation Plan, which again supports substantial evidence that the Site is unique environmentally. There is no direct evidence of a site walk conducted by qualified personnel to testify to the County's findings in Appendix F. Due to the unique character of Site 26, the County's example parcels outside the District are of completely different environmental character do not substantiate the claim of 12 developable acres either. Moreover, as explained above, the County cannot rely on the HCD's guidance to provide example parcels as sufficient to meet its environmental regulatory requirements—the HCD guideline is intended to help the agency meet the HCD's allocation requirements—not to certify the rezone program's ability to survive environmentally based litigation.

Finally, I'd like to respectfully request the Board take the conservative approach to development in our county, minimize environmental damage wherever feasible, and therefore be compelled to remove Site 26 from the Housing Element Amendment and Rezone Program entirely.

Thank you for your time,

Jaclyn Freeman

Jaclyn Freeman
Granite Bay Village Community Member

LETTER 165: JACLYN FREEMAN

Response to Comment 165-1

Please see the Responses to Comment Letter 162.

Letter 166

February 21, 2024

Placer County Planning Commission
Attn.: Planning Commission Clerk
3091 County Center Dr.
Auburn, CA 95603

Dear Placer County Planning Commission:

My name is Erik Freeman. I have been a homeowner and resident of Granite Bay since 2017, currently at 7213 Harbor Way. But this community is deeply rooted in my childhood because I purchased my home from my late grandparents, Jim and Margaret Knudson, who bought it when it was built in 1989. Collectively, my family and I have spent 33 years at 7213 Harbor Way, enjoying its unique front door access to the natural resources across the street, including specific Regional Housing Needs Allocation proposed District 4 rezone "Lots 24, 25, and 26" (as labelled in "Residential Land Inventory Rezone" Board of Supervisor's Presentation on February 13, 2024.) In regard to the Housing Needs Rezone Program (PLN22-00476) Draft Environmental Impact Report, I would like to respectfully request the Planning Commission reject the report from staff on the Draft Environmental Impact Report (DEIR), reject the DEIR itself, and furthermore reject the proposed rezoning of properties, with particular emphasis on Lots 26 from their current zoning designation to Residential Multifamily 30 (RM30).

166-1

Firstly, I believe the importance of the Planning Commission and Board of Supervisors conducting an independent, thorough, and accurate Environmental Impact Report (EIR) for the purposes of Regional Housing Needs Allocation throughout the county cannot be understated, even at the program-level analysis stage. According to CEQA Guidelines § 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. Currently, the DEIR fails to ensure the administrative record sufficiently supports the lead agency's findings of no significant environmental impacts in light of the record as a whole and is therefore ripe for litigation. While a program-level analysis may be appropriate at this stage, it is not a license to easily dispose of the lead agency's duty to avoid or minimize environmental damage where feasible, or to fail to provide substantial evidence to support the lead agency's EIR findings.

Directly across the street from my community lies Proposed Rezone Lot 26, on the corner of Douglas Blvd and Fuller Drive. Every single day I take my 2.5 year old son and dog on a walk right by Lot 26. I care deeply about the unique natural resource character of this land and its future, as my daughter was just born on February 5th of this month and she has yet to experience its fulfilling joy. My neighbors and many others drive from the surrounding areas to enjoy its beauty and the natural resources it uniquely supports on its boundaries and in adjacent areas.

For expediency, I'd like to highlight Lot 26 as an example of how the proposed rezone program will in fact cause significant environmental impacts based on the facts in the County record, thus illustrating the DEIR's gross inadequacies, and urge the Commission to reject it.

The DEIR should find there are significant environmental impacts to Aesthetics, and Lot 26 is an example of the DEIR's failure to support its findings by substantial evidence in light of the record on its whole. Section 1.5, Scope of the DEIR, *Aesthetics,* states:

> "the Planning Area of the General Plan does not contain officially designated scenic highways, corridors, vistas, or viewing areas…Therefore, development of the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway, and a less-than-significant impact would occur."

Contrary to the DEIR's statement above, current zoning of Lot 26 deems the area a "Design Scenic Corridor," (Dc), (see attached, Exhibit A, "Lot 26 Current Zone Report"). The Placer County Unincorporated Zoning Code defines Dc's under Section 17.52.070 as "areas of special natural beauty and aesthetic interest that constitute a basic resource in the county economy, the preservation of which in its most nearly natural state would enhance tourism." The County's own readily available zoning records designate scenic areas that are impacted by the rezone program. The DEIR dismisses Aesthetic impacts by declaring the State and Federal levels have not declared any areas as scenic, and mistakenly fails to address the county level facts in the record. Because the DEIR ignores known facts in the record, and facts directly contrary to a finding of less-than-significant impact are present, substantial evidence requires the Commission to reject the DEIR.

16-1 cont.

Furthermore, the DEIR should find there are significant environmental impacts to Agricultural & Forest Resources, and Lot 26 is an example of the DEIR's failure to support its findings by substantial evidence in light of the record on its whole. Section 1.5 Scope of the DEIR, *Agricultural & Forest Resources*, states:

> "A total of 12 rezone sites contain woodland habitat. However, all 12 rezone sites are located within the boundaries of the Placer County Conservation Program (PCCP)… The PCCP identifies woodland habitat as a key natural community that defines the major biological values of the PCCP. Pursuant to the PCCP, avoidance is encouraged and any impacts to woodland habitat is subject to payment of PCCP Development Fees – Land Conversion, which would fully address potential forest land/woodland impacts through off-site purchase of woodland preserves. Based on the above, the proposed project would not conflict with existing zoning for forest land or timberland and would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, a less-than-significant impact would occur."

Shockingly, the DEIR fails to inform the public which specific proposed 12 rezone sites contain woodland habitat. Not even a footnote notifies your citizens which sites in the County are up for effective expulsion from conservation by payment of fees and offsite

woodlands in their stead. To say this would constitute sufficient mitigation for the unique natural resources at risk is a bold departure from the County's declared goals for the PCCP. Because the DEIR fails to notify the public of the subject sites, there is not an effective opportunity for public comment. These lands are deemed significant enough for inclusion in the PPCP, therefore they deserve the opportunity for the Commission to hear its citizen urging for the removal these 12 sites from the rezone program. Lot 26, the one I walk by every day with my family, is one of these 12 sites. I have attached Exhibit B, the PCCP map showing it has significant unique characteristics of Oak Woodland Savannah, Valley Foothill Riparian Woodland, a PCCP Stream System, and declared Valley Elderberry Longhorn Beetle Modeled Habitat (VELB). Yet in the face of this evidence, the DEIR declares a less-than-significant impact would occur. This is not the case.

The PCCP sites should be removed from the proposed rezone program entirely. The PCCP specifically states that "avoidance is encouraged." The DEIR effectively ignores the County's own readily available PCCP records by declaring less-than-significant impacts when forested areas are specifically included in proposed sites. If the program removed the 12 PCCP sites, its DEIR finding could possibly stand. But the DEIR cannot survive scrutiny of its less-than-significant impact finding in the face of the PCCP designations, encouragement to avoid, and supposition that the Public Trust would adequately be protected via mitigations such as development fees and offsite forest sites. The inclusion and dismissal of PCCP sites in the rezone DEIR is a prime example of the gross inadequacies of the administrative record to support the DEIR findings. Therefore, the DEIR is ripe for litigation, and must be rejected by the Commission today.

16-1 cont.

My letter today highlights just a few gaps, in just one piece of this DEIR, for just one of the proposed rezone sites in the rezone program. I strongly urge the Commission to consider the depth and width of the contents of this DEIR for the rezone program and its readiness to defend it against the scrutiny of highly motivated multi-generational community members dedicated to the wise use and conservation of our unique natural resources. Finally, I respectfully request the Commission reject the staff's report on this DEIR, reject the DEIR itself, and furthermore reject the proposed rezoning of PCCP properties, with particular emphasis on Lot 26, from their current zoning designation to Residential Multifamily 30 (RM30).

Thank you for your time,

Erik Freeman

Erik Freeman
Granite Bay Village Community Member

EXHIBIT A
LOT 26 CURRENT ZONE REPORT

2/21/24, 1:54 PM Document

8989 AUBURN FOLSOM RD,
CA 95746

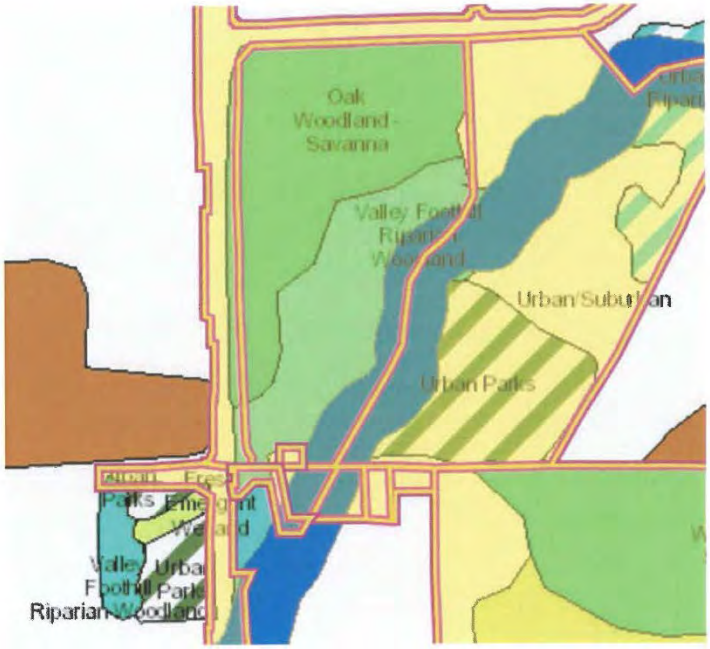


Parcel ID	047150053000
Zone	CPD
Allowed Use(s) - Primary	Residential(9), Lodging(1), Office(9), Commercial(28), Civic(5), Civic Support(2), Educational(6), Industrial(13)
Allowed Use(s) - Accessory	Residential(3),
Combining Zones	Dc (Design Scenic Corridor)
Informational Overlays	Resulting Height by average slope, PCCP Foothill, Land Coverage: Valley Foothill Riparian Woodland, Land Coverage: Urban/Suburban, Land Coverage: Oak Woodland - Savanna, Granite Bay Community Plan, Fire Severity Level: Urban Unzoned, Fire Severity Level: Moderate, Fire Protection Local Responsibility Areas (LRA), CalTrans Adjusted Urban Area
Lot Area - Public Records	-
Lot Area - GIS	762,128 ft²
Maximum Lot Coverage	50%
Residential Density	10.00 Du / Acre
Floor Area Ratio	N/A
Existing Building Area	-
Maximum Building Footprint	380,646 ft²

https://zonecheck.gridics.com/us/ca/placer-county?viewMode=map&folio=047150053000 1/2

16-1 cont.

EXHIBIT B
LOT 26 PCCP MAP



Ltr-1
cont.

LETTER 166: ERIK FREEMAN

Response to Comment 166-1

Please see Responses to Comments 163-1 through 163-7.

Letter 167

From: Barbara Funez
To: Placer County Environmental Coordination Services
Subject: RE: HOUSING NEEDS REZONE PROGRAM (PLN22-00476)
Date: Thursday, February 22, 2024 2:18:34 PM

Hi there,

RE: 5730 Sheridan Lincoln Blvd
019-191-013-000

My name is Barbara Funez I own the Post Office building lot next to this proposed rezoning.
Was hoping to be at the zoom meeting today but was out of town and my phone would not let me connect.
Is there a way to watch as I have concerns.?

167-1

I understand we need more housing, my only concern is that we need a gas station and transportation and a store (Sam's club by 65 stop light would solve all that...LOL
I would be interested in seeing what options are available to my lot, if my commercial lot in the future would be able to be included as like either or multi-family or commercial, or one the other.
Remember seeing a painting that I really loved and thinking of it often, not sure who wrote it:
But it's so true: **The only thing Permanent is change** :-)
Thank you
Barbara Funez
(707)372-6833

LETTER 167: BARBARA FUNEZ

Response to Comment 167-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 168

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opinion on high density housing at Auburn Folsom and Douglas
Date: Tuesday, March 19, 2024 10:31:02 AM

From: Todd Gaither <todd_gaither@yahoo.com>
Sent: Sunday, March 17, 2024 10:21 AM
To: Planning Commission <planningcommission@placer.ca.gov>; Daniel Woodward <DWoodward@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Opinion on high density housing at Auburn Folsom and Douglas

To Whom it May Concern:

168-1

I understand the obligation for Placer County to designate a certain number of locations for high density low income housing, but Property #26 is not suited for this purpose. I am very concerned by the numerous red flags raised throughout the review process by concerned citizens and others. I urge you not to accept these shortcomings when there are other locations that would not present these challenges.

The record in this process is overflowing with concern that will, if not now, cause further challenges that will delay or prevent the underlying objective of adequate affordable housing from being fulfilled. Approval of a parcel that ultimately can't be developed due to environmental, safety, traffic, available public services and other material shortcomings will not serve the county or the community. The concerns being raised now will not go away.

168-2

As others have repeatedly articulated and demonstrated, Property #26 includes wetland vernal pools, has been declared a habitat for Salmon, is immediately adjacent to Cavitt Jr High School, would have public access to Folsom lake with unsupervised trails, no restrooms and lifeguards, and the Auburn Road corridor is already heavily impacted by traffic. Potentially adding 1000 or more occupants in this location will have adverse consequences to the environment, health and safety, unprepared infrastructure and the community character. Further, mitigation of these significant issues will be costly, will

168-2 cont.

cause delay and may very well make the planned development of the property impossible.

168-3

I recommend that you direct staff to return with three alternative parcels in District 4 for further consideration before making any decision. Otherwise, you will have simply passed the identified problems on to other agencies that will have to deal with them. Your responsibility is to look out for all communities in Placer County so that we may all continue to enjoy the benefits of living in this special place. The only way to be sure and fulfill the fundamental obligations is to pass on Property #26 at this stage and continue your search for suitable properties on the road to adequate affordable housing.

Kind regards,
Todd Gaither

LETTER 168: TODD GAITHER

Response to Comment 168-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 168-2
Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 4 – Traffic Safety, as well as Response to Comment 164-13.

Rezone Site #26 is located within the PCCP plan area, and the two salmonids are Covered Species under the PCCP; therefore, PCCP Covered Activities on Rezone Site #26 would not require independent authorization from NMFS. The Placer Conservation Authority (PCA) has already consulted with NMFS regarding impacts to salmonids throughout their PCCP plan area, and the provisions required under that consultation are included in PCCP Species Condition 7, which is required on page 5-75 of the Draft EIR. As noted on page 44 of BRA Attachment C, this condition is expected to be required for work within Rezone Site #26.

With respect to the commenter's claim of unprepared infrastructure, as discussed on pages 67 to 69 of the Initial Study prepared for the proposed project (attached as Appendix A to the Draft EIR), the existing infrastructure that is located within the vicinity of each rezone site is included in the Site Inventory Forms prepared for the proposed project (attached as Appendix C to the Draft EIR). As presented therein, existing water and sewer infrastructure is generally located in the immediate vicinity of the rezone sites. Such infrastructure would be used to provide water and sewer service to future development on the rezone sites. As such, the proposed project would not require major relocation or expansion of any water and sewer service infrastructure, the construction of which could cause significant environmental effects, including for Site #26. Furthermore, Mitigation Measures X-1 and X-2 of the Initial Study require preparation of a Final Drainage Report prior to the approval of each future development project. In general, the Final Drainage Reports would specify the existing conditions of each rezone site, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from each project, as well as water quality protection features and methods to be used during construction, and long-term post-construction water quality measures. Thus, future storm drainage facilities associated with development of Site #26 would not require major relocation or expansion of any water and sewer service infrastructure, the construction of which could cause significant environmental effects.

Response to Comment 168-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 169

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opinion on high density housing at Auburn Folsom and Douglas
Date: Tuesday, March 19, 2024 10:30:37 AM

-----Original Message-----
From: Beth Gaither <bethgaither@yahoo.com>
Sent: Sunday, March 17, 2024 10:11 AM
To: Planning Commission <planningcommission@placer.ca.gov>; Daniel Woodward <DWoodward@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Opinion on high density housing at Auburn Folsom and Douglas

>
>
> To Whom it May Concern:
>
> I understand the obligation for Placer County to designate a certain number of locations for high density low income housing, but Property #26 is not suited for this purpose. I am very concerned by the numerous red flags raised throughout the review process by concerned citizens and others. I urge you not to accept these shortcomings when there are other locations that would not present these challenges.
>
> The record in this process is overflowing with concern that will, if not now, cause further challenges that will delay or prevent the underlying objective of adequate affordable housing from being fulfilled. Approval of a parcel that ultimately can't be developed due to environmental, safety, traffic, available public services and other material shortcomings will not serve the county or the community. The concerns being raised now will not go away.
>
169-1 > As others have repeatedly articulated and demonstrated, Property #26 includes wetland vernal pools, has been declared a habitat for Salmon, is immediately adjacent to Cavitt Jr High School, would have public access to Folsom lake with unsupervised trails, no restrooms and lifeguards, and the Auburn Road corridor is already heavily impacted by traffic. Potentially adding 1000 or more occupants in this location will have adverse consequences to the environment, health and safety, unprepared infrastructure and the community character. Further, mitigation of these significant issues will be costly, will cause delay and may very well make the planned development of the property impossible.
>
> I recommend that you direct staff to return with three alternative parcels in District 4 for further consideration before making any decision. Otherwise, you will have simply passed the identified problems on to other agencies that will have to deal with them. Your responsibility is to look out for all communities in Placer County so that we may all continue to enjoy the benefits of living in this special place. The only way to be sure and fulfill the fundamental obligations is to pass on Property #26 at this stage and continue your search for suitable properties on the road to adequate affordable housing.
>
> Kind regards,
> Elizabeth Gaither

LETTER 169: ELIZABETH GAITHER

Response to Comment 169-1

Please see Responses to Comment Letter 168.

Letter 170

From: Cynthia Garbutt
To: Placer County Environmental Coordination Services
Subject: Rezoning site 26
Date: Monday, March 11, 2024 1:27:39 PM

Dear ECS,

170-1

We moved to our current home on 6867 Boardwalk Drive in Granite Bay 25 years ago. We were attracted to the master community plan that described a semi-rural setting with low density living. Since that time, things have changed in the area. To leave our neighborhood, it used to be a brief stop (less than 1 minute) to get in or out on either Douglas or Auburn-Folsom. The traffic has increased so much it now takes between 2-4 minutes to exit or enter the neighborhood on either road. Often the traffic is so backed up on Douglas that we must wait for the light to change and the stopped traffic to move to turn in either direction. There is the constant drone of cars and the associated pollution. There are frequent accidents along this same area.

The proposed high-density housing on Douglas (past Auburn-Folsom) and the two sites on Auburn-Folsom will have a major impact on traffic in our neighborhood and surrounding area. In addition to what is already described above, the traffic from dropping and picking up children at Cavitt School will become more problematic than it already is. The traffic streaming through the neighborhood and the light a Fuller/Auburn-Folsom Road already creates major traffic congestion. Everyone that we talk to tells us they avoid the Auburn-Folsom/Douglas area at all costs because of the traffic.

170-2

We are not opposed to the low and very low-income housing but rather the proposed density, especially in an area without services like public transportation and without much opportunity for employment. There is no mass transit option. Assuming they construct 600 units, this will add between 900-1,000 more cars to the area. This will increase the traffic congestion, air pollution, noise pollution and potentially the number of accidents.

170-3

High density housing for the elderly, memory impaired and other populations have been built in the immediate area. There are plans for a church to go in at the old Dick's Taxidermy site. These new additions to the community have already added to the traffic and changed the feel of the community. It feels like Granite Bay is being singled out for a major proportion of the low and very low-income units required to satisfy the requirements for the entire county.

Based on experience, going up against the powerful, politically savvy, and well-funded developers is usually impossible but I still hold out hope that we can work together to preserve the community. I am also disappointed that this has progressed so far down the pathway without notifying the folks that live in the immediate and nearby neighborhoods. It seems like the Auburn-Folsom sites are a done deal regardless of the impact or option that is selected. We may have no other choice but to move from the area we have called home for the past 25 years!

We appreciate your efforts to provide a voice on this and other issues for the Granite Bay community.

Respectfully submitted,

Cindy Garbutt
Gene Garbutt
Jessie Garbutt
Robert Garbutt

LETTER 170: CINDY GARBUTT, GENE GARBUTT, JESSIE GARBUTT, AND ROBERT GARBUTT

Response to Comment 170-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Please also see Master Response 4 – Traffic Safety.

Response to Comment 170-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 170-1.

Response to Comment 170-3

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 171

From: Theodore Garelis
To: Suzanne Jones; Placer County Environmental Coordination Services; Planning Commission; Keri Burri
Subject: Low income housing and very low income housing; zoning change for parcels next to Cavitt Jr High
Date: Friday, March 8, 2024 3:43:50 PM

Mrs Jones and the folks on the Planning Commission,

171-1 I do not support re-zoning the parcels near Cavitt Junior High School. I am a ten year resident of Granite Bay. This area of Placer County is not suitable for high density development. There is a lack of jobs, shopping and transportation for low income and very low income people in this specific area of Placer County. It is not a good match for such future residents and current residents. There are other areas of Placer County where development would be more suitable.

I alerted the powers-that-be to my position on this previously by messages to Placer County Staff and to Supervisor/Mrs Jones. As Mrs Jones told me she does not support such intense development and as she represents the people of this district, I would think that her position would be sufficient to end this project and to place it elsewhere.

171-2 I have heard that there is some idea that an EIR would be waived for some part or all of this re-zoning project. I am not an expert on EIRs, but I have always understood that almost any project of any size whatsoever merits an EIR. This makes no sense to me.

171-3 I would appreciate it if the County would take action in accordance with the sentiments expressed above.

Theodore Garelis
8900 Los Posas Court
Granite Bay
916 652 2020

LETTER 171: THEODORE GARELIS

Response to Comment 171-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 171-2
Contrary to the comment, an EIR was not waived for the proposed rezoning project. Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Response to Comment 171-3
Please see Response to Comment 160-3.

Letter 172

From: Mel George
To: Placer County Environmental Coordination Services; Planning Commission
Subject: Proper DEIR Request
Date: Saturday, March 9, 2024 10:41:39 AM

Hello,

172-1 I am requesting that a timely and adequate DEIR be done for project site number 26 near Cavitt middle school. I also would like to stress the effect this will have on our communities infrastructure that is already taxed as it is. How do you propose to ensure enough resources are available per capita?

Respectfully,

Melissa

LETTER 172: MELISSA GEORGE

Response to Comment 172-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR, as well as the discussions and analyses in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project (attached as Appendix A to the Draft EIR).

Letter 173

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Placer County Rezone Program (Blitz/Edgewood)
Date: Tuesday, February 20, 2024 9:18:00 AM

-----Original Message-----
From: Afina Gibbs <afina.gibbs@gmail.com>
Sent: Monday, February 12, 2024 11:02 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Placer County Rezone Program (Blitz/Edgewood)

173-1 As homeowners of a residence off of Edgewood Road, we are very much against developing higher density housing on any of the properties in question on Blitz Lane and Edgewood Road.

173-2 Increased traffic on a narrow residential road, compromised pedestrian safety, decreased valuation of our home values, an increase in crime and more suburban blight along our corridor of Grass Valley Highway are of great concern to us.

173-3 Examples of the above concerns are many. Edgewood Road has no sidewalks and pedestrians have to step up and down on uneven surfaces to stay safe from passing cars. The number of cars awaiting their turn at the signal also have to be mindful of cars trying to take a shortcut from Nevada Street through a business parking lot on the right side adds to the chaos of the intersection.

173-4 Transients making their way along Grass Valley Highway have entered our neighborhoods and committed crimes. The most serious being that of a carjacking in broad daylight at a day care center on Live Oak Lane back in late 2021 or 2022. And yes, there was a child in the car! Thus it became a kidnapping. Fortunately, the car was spotted by PCSO helicopter and the child was rescued.

We trust that you, as a county planner, choose wisely and remove the properties along Blitz Lane and Edgewood from the Rezone Program.

Sincerely,

David and Afina Gibbs
1195 Sleeping Child Lane
Auburn, CA 95603

LETTER 173: DAVID AND AFINA GIBBS

Response to Comment 173-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 173-2
Please see Master Response 2 – Social and Economic Impacts and Master Response 4 – Traffic Safety.

Response to Comment 173-3
Please see Master Response 4 – Traffic Safety.

Response to Comment 173-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 174

From: A G
To: Jeff Ronten; Planning Commission; Kally Kedinger-Cecil; Cindy Gustafson; Board Clerk; Placer County Environmental Coordination Services; cityclerks@auburn.ca.gov City Clerk; adowdincalvillo@auburn.ca.gov Dowdin Calvillo; rradell-harris@auburn.ca.gov Radell-Harris; msierrasammons@auburn.ca.gov Sierra Sammons; mholmes@auburn.ca.gov Holmes
Subject: Opposition to inclusion of sites 71 and 72 in Rezone Project and comments on EIR
Date: Sunday, March 17, 2024 11:08:37 PM

To whom this may concern,

174-1 As a North Auburn homeowner living directly across the street from Sites 71 and 72 on Lincoln Way being considered for the Placer County Rezone Project, I am writing to express my vehement opposition to the inclusion of these properties. I believe there are several reasons why these properties are simply unsuitable for this type of project and some additional reasons why such a project at this location would have a substantial negative impact on the character of Auburn as a whole. The currently reported Environmental Impact Report is clearly deficient as it fails to adequately recognize some of these negative impacts that it purports to be investigating and reporting upon.

First, I would like to alert you to two conditions, which I believe make the properties unsuitable for high density housing: wildfire danger and traffic impact.

Strategy WF-5 of the Placer County Sustainability Plan adopted in 2020 requires all large new development projects in Moderate, High, or Very High Fire Hazard Severity Zones to have multiple points of ingress and egress to improve evacuations and emergency response access. Sites 71 and 72 are in a High Fire Hazard Severity Zone and do not have multiple points of ingress and egress. Furthermore, they are just on the edge of the canyon and have very steep topography, making construction very challenging. Those of us already living in the area are finding it essentially impossible to secure fire insurance from a carrier other than California Fair Plan. It would be irresponsible to add additional housing to an area that is essentially uninsurable.

174-2 Sites 71 and 72 have a proposed unit density of 142. The entrance to these properties is situated at a blind corner on Lincoln Way where traffic incidents are occurring on a regular basis. Over the past few years there have been a number of serious injury accidents at this location. Putting hundreds of additional vehicles on the road at this dangerous curve is a recipe for more traffic accidents and is simply unsafe.

Initially, when I heard about the project I worried about the negative effects it would have on my view of the American River Canyon from my home across the street, and the adverse impacts on my property's value. I have come to understand that the negative impacts of such a project would be so much more profound for the entire community of Auburn and its visitors.

174-3 I read the Initial Study and Checklist from the Community Development Resource Agency Environmental Coordination Services and was surprised to see no mention of the very clear detrimental effects a high density housing project will have on the aesthetics of Auburn's landscapes and vistas. The Initial Study Purports to have investigated this topic, yet it makes no mention of the fact that sites 71 and 72 are clearly visible from the Foresthill Bridge, one of California's great landmarks as the highest bridge in the state. Placing a high density housing

project at the edge of the American River Canyon where it is visible from the state's highest bridge and one of the area's most treasured vistas shows a complete lack of regard for the beauty of the area and for the community and its visitors. A high density housing project at sites 71 and 72 would ruin the view of the wooded Auburn hillside from the American River Canyon and the Forest Hill Bridge. Such a project would have a substantial negative impact on the areas aesthetics. How can the Environmental Impact Report have failed to recognize this?

174-3 Cont.

Let me be clear, I am not opposed to high density housing or low-income housing in my neighborhood in Auburn. Mere feet from Sites 71 and 72 is a large plot of land on the southwest corner of Lincoln Way and Russell Road that has been for sale for years and appears to be a much more suitable location for higher density housing. It has multiple areas for ingress and egress. The land is flat and would be much easier to build on than sites 71 and 72.

174-4

I urge you to reconsider including sites 71 and 72 in the Rezone plan. Take a look at the property on the southwest corner of Lincoln Way and Russell Rd. It could be a much better option with less traffic hazards, reduced fire danger, and lesser negative effects on community aesthetics. The environmental impact report appears to be deficient in its failure to recognize these issues. Our community, the people of Placer County, and the citizens of California deserve better.

175-5

Sincerely,

Andrea Glassberg
106 Lincoln Way, Auburn

LETTER 174: ANDREA GLASSBERG

Response to Comment 174-1
Please see Chapter 10, Fire Protection and Wildfire, of the Draft EIR. If and when a development proposal is submitted, transportation and circulation would be analyzed to ensure safety and compatibility with applicable roadway design standards.

Response to Comment 174-2
The proposed project does not include any site-specific development plans, so the feasibility of access for Rezone Sites #71 and #72 cannot currently be evaluated. The Draft EIR does not include any specific information as to where or how a rezone site would be accessed. While the proposed rezone sites are in the unincorporated County, the roadway, itself, is owned, operated, and maintained by the City of Auburn. If development is proposed on Rezone Sites #71 and #72, the proposed project would be reviewed in accordance with the City's roadway and encroachment standards. A project applicant would be required to provide engineering designs to meet applicable requirements, based on the size of the proposed project. The project applicant would be required to obtain an encroachment permit from the City of Auburn in order to construct an access point on Lincoln Way. See also Master Response 2 – Social and Economic Impacts.

Response to Comment 174-3
The comment does not provide evidence that Rezone Sites #71 and #72 are visible from Foresthill Bridge; however, existing residential and commercial development is visible from the bridge. The portion of Lincoln Way where Rezone Sites #71 and #72 are located are among existing developments including single and multifamily development, and development of the rezone sites would not be a departure from the existing character of the area. Furthermore, as noted in Section I, Aesthetics, of the Initial Study prepared for the proposed project (attached as Appendix A to the Draft EIR), officially designated scenic highways, corridors, vistas, or viewing areas in Placer County do not occur in the County.

Response to Comment 174-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 174-5
The Draft EIR analyzes potential impacts related to traffic and transportation, wildfire and fire protection, and aesthetics within the applicable technical chapters. The comment does not detail how the analysis of the Draft EIR is inadequate, nor provide specific examples of how the mitigation measures are not sufficient to reduce potential impacts resulting from the proposed project.

Letter 175

From: A G
To: Jeff Ronten; Planning Commission; Kally Kedinger-Cecil; Cindy Gustafson; Board Clerk; Placer County Environmental Coordination Services
Subject: Opposition to inclusion of sites 71 and 72 in Rezone Project
Date: Monday, February 26, 2024 9:50:31 PM

To whom this may concern,

As a North Auburn homeowner living directly across the street from Sites 71 and 72 on Lincoln Way being considered for the Placer County Rezone Project, I am opposed to the inclusion of these properties for a multitude of reasons. I would like to alert you to two conditions, which I believe make the properties unsuitable for high density housing: traffic impact and wildfire danger.

Strategy WF-5 of the Placer County Sustainability Plan adopted in 2020 requires all large new development projects in Moderate, High, or Very High Fire Hazard Severity Zones to have multiple points of ingress and egress to improve evacuations and emergency response access. Sites 71 and 72 are in High Fire Hazard Severity Zone and only have a single point of ingress and egress. Furthermore, they are just on the edge of the canyon and have very steep topography, making construction very challenging.

Sites 71 and 72 have a proposed unit density of 142. The entrance to these properties is right at a blind corner on Lincoln Way where traffic incidents are occurring on a regular basis. Putting hundreds of additional vehicles on the road at this dangerous curve is a recipe for more traffic accidents and is simply unsafe.

175-1

Let me be clear, I am not opposed to high density housing or low-income housing in my neighborhood in Auburn. Mere feet from Sites 71 and 72 is a large plot of land on the southwest corner of Lincoln Way and Russell Road that has been for sale for years and appears to be a much more suitable location for higher density housing. It has multiple areas for ingress and egress. The land is flat and would be much easier to build on than sites 71 and 72.

The owner of the properties at sites 71 and 72 has been trying to develop the land for several years without success. I suspect that their willingness to participate in the Rezone program is simply due to their inability to recoup their investment on these properties. The fact that these properties have been so challenging to develop for less dense purposes should be an alert that placing a larger project at this location may not be feasible.

I urge you to reconsider including sites 71 and 72 in the Rezone plan. Take a look at the property on the southwest corner of Lincoln Way and Russell Rd. It could be a much better option.

Sincerely,

Andrea Glassberg
106 Lincoln Way, Auburn

LETTER 175: ANDREA GLASSBERG

Response to Comment 175-1

Please see Responses to Comment Letter 174.

Letter 176

From: Laura Gleason
To: Placer County Environmental Coordination Services; Planning Commission; Cindy Gustafson; Suzanne Jones; Jim Holmes; Shanti Landon; Bonnie Gore
Subject: Fw: Request for EIR for Project/Site 26
Date: Saturday, March 9, 2024 9:27:14 AM

County Supervisors,

176-1 Regarding Project/Site 26, this location is a habitat to many local small and medium sized animals. Further Linda Creek runs through it. We need a full and proper EIR before making a mistake by pressing forward to develop this site. Until then please vote no to develop high density on this site and instead choose other areas already zoned for commercial or high density.

Laura Gleason
Granite Bay
916-872-5463

LETTER 176: LAURA GLEASON

Response to Comment 176-1

Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR. In addition, regarding biological resources concerns for Site 26, please see Response to Comment 52-2 and Responses to Comment Letter 163.

Letter 177

From: Ryan G
To: Placer County Environmental Coordination Services; Planning Commission
Cc: Cindy Gustafson; Suzanne Jones; Jim Holmes; Shanti Landon; Bonnie Gore
Subject: Request for EIR for Project/Site 26
Date: Sunday, March 10, 2024 11:15:18 AM

County Supervisors,

177-1 Regarding Project/Site 26, this location is a habitat to many local small and medium sized animals. Further Linda Creek runs through it. We need a full and proper EIR before making a mistake by pressing forward to develop this site. Until then please vote no to develop high density on this site and instead choose other areas already zoned for commercial or high density.

Ryan Gleason
Granite Bay
916-521-8999

LETTER 177: RYAN GLEASON

Response to Comment 177-1

Please see Response to Comment 176-1.

Letter 178

From: Chris Gleason
To: Placer County Environmental Coordination Services; Planning Commission
Cc: Cindy Gustafson; Suzanne Jones; Jim Holmes; Shanti Landon; Bonnie Gore
Subject: Request for EIR for Project/Site 26
Date: Saturday, March 9, 2024 9:24:46 AM

County Supervisors,

178-1 Regarding Project/Site 26, this location is a habitat to many local small and medium sized animals. Further Linda Creek runs through it. We need a full and proper EIR before making a mistake by pressing forward to develop this site. Until then please vote no to develop high density on this site and instead choose other areas already zoned for commercial or high density.

Chris Gleason
Granite Bay
805-889-2445

LETTER 178: CHRIS GLEASON

Response to Comment 178-1

Please see Response to Comment 176-1.

Letter 179

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment to RM-30
Date: Tuesday, March 19, 2024 10:56:57 AM
Attachments: Outlook-stthss0u.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:07 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment to RM-30

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Julie Goodwin <julesgood@gmail.com>
Sent: Tuesday, March 5, 2024 5:40 PM
To: supervisorgor@placer.ca.gov <supervisorgor@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment to RM-30

Dear Members of the Placer County Planning Department,

179-1

I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to

reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

179-1 cont.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning.

Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely,

Julie Goodwin

LETTER 179: JULIE GOODWIN

Response to Comment 179-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety, as well as Responses to Comment Letter 115.

Letter 180

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services; Board Clerk
Subject: FW: North Auburn Rezone
Date: Thursday, February 22, 2024 6:54:13 AM

From: Aliona gorceac <alinagorceac@yahoo.com>
Sent: Wednesday, February 21, 2024 6:21 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: North Auburn Rezone

Drear Senior Planner Kally Kedinger,

180-1 *I am writing to you to express my concern and opposition to the housing needs rezone in North Auburn on Graeagle Lane lot 42. Although, I understand the importance and the demand for affordable housing in our community, I believe that this project would have a detrimental impact on our neighborhood.*

180-2 *First and foremost, this type of high density development is not suitable for this location. The increase in population would put a burden on our infrastructure, leading to increased traffic congestion, and noise pollution. Additionally, the construction of this project would result in significant environmental deterioration, destroying natural habitats and contributing to wildlife relocation.*

180-3 *Furthermore, the multiunit housing is simply not in keeping with the character of the one level residential houses in our neighborhood. This development would also, drastically alter the aesthetic of our area by replacing the existing open space with a high-density housing complex. Because of the close proximity of the proposed project with the existing houses some of our neighbors could loose a significant amount of the daily sunlight, which could potentially affect their health and the growing native vegetation in their backyards.*

180-4 *Finally, I am deeply concerned about the impact this development would have on property values in the surrounding area. The High Density Multi Unit Housing could result in a decline in property value, making it difficult for current residents to sell their homes and move elsewhere.*

180-5 *In conclusion, in solidarity with us, I strongly urge you to object to this rezone. While I recognize the need for affordable housing, I believe that this project is simply not the right fit for our neighborhood. Thank you for your attention to this matter.*
I firmly believe, that you will continue to stand up for our community, as you always did, to listen to our voices and to support us!

Sincerely,
Aliona Gorceac
Auburn, Graeagle Lane Resident

Sent from my iPhone

LETTER 180: ALIONA GORCEAC

Response to Comment 180-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 180-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

In addition, please refer to the analyses and conclusions in Chapter 5, Biological Resources and note that the subject North Auburn area is within the Placer County Conservation Program (PCCP) boundaries for which avoidance and minimization measures have been adopted to ensure that covered activities within the Plan area, such as potential residential development on rezone sites, would not result in adverse effects to protected biological resources.

Please also note that a programmatic traffic noise analysis is included in Chapter 7, Noise, of the Draft EIR. In addition, please also see the analyses and conclusions in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project (attached as Appendix A to the Draft EIR).

Response to Comment 180-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 180-4
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 180-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 181

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: North Auburn High Density Housing
Date: Wednesday, February 21, 2024 9:49:23 AM

From: Laura Gorceac <laura.gorceac23@gmail.com>
Sent: Wednesday, February 21, 2024 8:28 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: North Auburn High Density Housing

Good Morning Kally,

181-1 I hope this email finds you well. I was informed about a vote that took place last week to place High Density Multi Unit Housing in the lot behind Bedrosians Tile in North Auburn near Graeagle and Sherwood. I am not sure what stage of the process we are at, but I wanted to personally express my concerns as a resident of Graeagle Ln. I believe this high-density housing would have detrimental implications to North Auburn as the traffic has already increased dramatically over the last several years. My family's neighborhood is a quiet and peaceful place to live and I know many of my elderly neighbors would be burdened by more noise, traffic, and a lack of privacy as well. There must be better options for a housing development like this one.

If there is anyone else I can contact to express our concerns, please let me know.

Thank you,
Laura Gorceac

LETTER 181: LAURA GORCEAC

Response to Comment 181-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Responses to Comment Letter 180.

Letter 182

From: Sandra Gordon
To: Placer County Environmental Coordination Services
Subject: New apartments next to Cavitt jr high school.
Date: Friday, March 8, 2024 7:19:19 PM

182-1

This is totally unexceptable . We already have a traffic congestion on Auburn Folsom. This is only going to cause more issues.

We live here in this rural neighborhood to be away from the chaos of more people and traffic. We have built our lives and homes and worked hard to have this type of life without a bunch of low income housing coming in trying to invade our life style.
This low income housing will totally change the environment of our neighborhood.

Please consider the people that have devoted their lives to have a lifestyle of this choice.

We don't need people of low income status forcing our neighbors to come down to their standards.
Sent from my iPhone

LETTER 182: SANDRA GORDON

Response to Comment 182-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 183

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezone of 8850 & 8989 Auburn Folsom Rd
Date: Monday, March 11, 2024 4:08:07 PM

From: Zack Gossell <zg@westhawkcre.com>
Sent: Monday, March 11, 2024 2:04 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; katiegossell@gmail.com
Subject: Rezone of 8850 & 8989 Auburn Folsom Rd

Hello Ms. Kedinger-Cecil,

183-1

My name is Zack Gossell and I am a home owner at 7120 Laketrail Ct in Granite Bay and recently received the government mandated "Housing Needs Rezone Program Notification" letter due to my 300 foot proximity of 8850 & 8989 Auburn Flolsom Rd. My family and neighbors are deeply concerned about the county's plan to rezone this lot. Can you please specify the county's plan for the development here?

Your letter addresses the change to Residential Multifamily 30 (RM30) which is an extremely high density for this area. The rumors that have been circulating are that it will be used for Low and Very Low-Income housing. I moved from Natomas in Sacramento over 14 years ago because I witnessed first-hand the effects of the overbuilding of subsidized housing. Crime rose dramatically and our property values plummeted. We had to move. I do not want to see the same thing happen here in our corner of Placer County. I understand that nobody prefers this type of housing in their backyards, however this community is definitely not the place for it. Between the lack of public transportation, the intended rural zoning which all community members here bought into, the proximity to a middle school, the impact to traffic along Auburn-Folsom, the height that would be needed to fit this many units on the land, and the strain on public services, there are plenty of other locations within the county which would be better suited for this. When looking at your letter initially I saw the use permitted highlighted in red which give specifies on Senior Housing (see below image of actual letter included). However, upon re-reading your letter I am not so sure that is what is actually going here since it is only highlighted in red but not specifically saying that is what it is going to be. I hope you are not trying to mislead the people here. Can you please clarify?
Thank you-

183-1
Cont.



ALLOWABLE LAND USES	LAND USE PERMIT	SPECIFIC STANDARDS IN SECTION:
Multifamily dwellings	C	17.56.135
Residential accessory uses	C	17.56.180
Residential care homes, 6 or fewer clients	C	
Residential care homes, 7 or more clients	MUP	
Senior housing projects[1]	CUP	17.56.210
Senior housing projects[1]	C	17.56.210 & 17.56.135
Single-room occupancy residential housing, 30 or fewer units	C	17.56.233
Single-room occupancy residential housing, 31 or more units	MUP	17.56.233
Service Uses		
Cemeteries, columbariums and mortuaries	CUP	
Child/adult day care, centers	MUP	
Child day care, family care homes	A	
Medical services - Hospitals and extended care	CUP	
Offices, temporary	MUP	17.56.300
Storage, accessory	A	17.56.250
Transient Lodging		
Bed and breakfast lodging	MUP	17.56.070
Transportation and Communications		
Antennas, communications facilities	See Section 17.56.060	
Pipelines and transmission lines	A	

(1) Senior housing projects including owner-occupied and/or rental multifamily uses that include a minimum of twenty percent (20%) affordable housing (as defined in Government Code Section 65915), is permitted with a zoning clearance only.
(1) Senior housing projects including owner-occupied and/or rental multifamily uses that do not include a minimum of twenty percent (20%) affordable housing (as defined in Government Code Section 65915) is only permissible in this zone district with a Conditional Use Permit.

KEY TO PERMIT REQUIREMENTS

Allowed use, zoning compliance required (17.06.050)	A
Zoning clearance required (17.06.050)	C
Minor use permit required (17.06.050)	MUP
Conditional use permit required (17.06.050)	CUP

C. Residential Density. Any residential multifamily development within the RM 30 zone district shall be established at a minimum density of 20 units per acre and maximum density of 30 units per acre. For purposes of this Section the net density shall be used to calculate density. The net density being total residential units divided by the total residential land area (excludes roads and road easements, open spaces, sensitive habitat areas, slopes exceeding 15%, and other uses).

D. Site Development Standards. All new development in the RM 30 zone, except where otherwise provided by Articles 17.54 (General Development Standards) or 17.56 (Specific

2

Draft 8/15/21/29/24

Zack Gossell
916.206.3056

LETTER 183: ZACK GOSSELL

Response to Comment 183-1

The proposed project does not include any site-specific development plans. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. In addition, please see Responses to Commenter Letter 163 and Response to Comment 470-2.

Letter 184

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Proposed SITE 74
Date: Tuesday, February 20, 2024 9:15:51 AM

From: shelleygrayntp@gmail.com <shelleygrayntp@gmail.com>
Sent: Friday, February 9, 2024 2:57 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Proposed SITE 74

Hello Mr. Kedinger-Cecil,

I am writing you today to voice some very serious concerns I have, along with my fellow neighbors and community, regarding the proposed Site 74 Low Income Housing Units. I have been residing in Princeton Club for 25 years now. We built our home here in 1998 and raised our children. I continue to witness the many other neighbors who too are raising their families. We as a community take great pride in our neighborhood. We keep our streets clean, our yards and homes up, as well as implement safeguards to protect us all. We are a quiet and very respectful community.

184-1

This proposition is without question a threat to all that we have built and maintained in the past two and a half decades. We have seen the rise in the amount of homeless individuals here in our district. We also have been made aware of WHY this is happening in our district. What we are seeing is the county officials not only allowing North Auburn and placer county to be turned into the dump zone for homeless and newly released criminals, but actually welcoming them by building ADDITIONAL housing units. We also know that MANY of these individuals are being bussed here directly from Sacramento and Reno! It is not the responsibility of the citizens of Placer County to take a direct hit on our property value, by accepting this. What we need is for our county officials to uphold what this city has been and support growth in a healthy and prosperous manner. Auburn is a beautiful and historical city that will soon reflect the poor decisions and actions that are not aimed at maintaining its CHARACTER AND VALUE!! The solution is not to continue to support more of this. Auburn already has multiple low income housing units. The fact remains,

that we have already come to the point where we have hit maximum capacity.

As you can see I am absolutely OPPOSED to this proposition. I urge you to make the appropriate decision in maintaining the value and integrity of our city district. Take SITE 74 off the table as well as any other future proposed projects. Instead, do what you can to propose an actual law/bill that states that every city has a cap, after which, a NEW district/city must be sought. I will continue to make my voice heard and know that this project will be fought by MANY here in our community.

194-1 cont.

Regards,
Shelley Gray

LETTER 184: SHELLEY GRAY

Response to Comment 184-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 185

From: shelleygravntp@gmail.com
To: Placer County Environmental Coordination Services
Subject: Proposed SITE 74
Date: Friday, February 9, 2024 3:00:06 PM

To Whom it may concern,

I am writing you today to voice some very serious concerns I have, along with my fellow neighbors and community, regarding the proposed Site 74 Low Income Housing Units. I have been residing in Princeton Club for 25 years now. We built our home here in 1998 and raised our children. I continue to witness the many other neighbors who too are raising their families. We as a community take great pride in our neighborhood. We keep our streets clean, our yards and homes up, as well as implement safeguards to protect us all. We are a quiet and very respectful community.

185-1

This proposition is without question a threat to all that we have built and maintained in the past two and a half decades. We have seen the rise in the amount of homeless individuals here in our district. We also have been made aware of WHY this is happening in our district. What we are seeing is the county officials not only allowing North Auburn and placer county to be turned into the dump zone for homeless and newly released criminals, but actually welcoming them by building ADDITIONAL housing units. We also know that MANY of these individuals are being bussed here directly from Sacramento and Reno! It is not the responsibility of the citizens of Placer County to take a direct hit on our property value, by accepting this. What we need is for our county officials to uphold what this city has been and support growth in a healthy and prosperous manner. Auburn is a beautiful and historical city that will soon reflect the poor decisions and actions that are not aimed at maintaining its CHARACTER AND VALUE!! The solution is not to continue to support more of this. Auburn already has multiple low income housing units. The fact remains, that we have already come to the point where we have hit maximum capacity.

As you can see I am absolutely OPPOSED to this proposition. I urge you to make the appropriate decision in maintaining the value and integrity of our city district. Take SITE 74 off the table as well as any other future proposed

185-1 cont.

projects. Instead, do what you can to propose an actual law/bill that states that every city has a cap, after which, a NEW district/city must be sought. I will continue to make my voice heard and know that this project will be fought by MANY here in our community.

Regards,
Shelley Gray

LETTER 185: SHELLEY GRAY

Response to Comment 185-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 186

From: Christopher Hale
To: Jeff Ronten; Planning Commission; Kally Kedinger-Cecil; Cindy Gustafson; Board Clerk; Placer County Environmental Coordination Services; cityclerks@auburn.ca.gov City Clerk; adowdincalvillio@auburn.ca.gov Dowdin Calvillo; rradell-harris@auburn.ca.gov Radell-Harris; msierrasammons@auburn.ca.gov Sierra Sammons; mholmes@auburn.ca.gov Holmes
Cc: Andrea Glassberg
Subject: Re: Opposition to inclusion of sites 71 and 72 in Rezone Project and comments on EIR
Date: Monday, March 18, 2024 3:43:39 PM

To whom this may concern,

186-1

I was surprised to learn that this rezoning effort has been in progress since last summer. Are you aware that the neighborhood is only now learning of this issue in March of 2024? Additionally, I understand this notification was only sent to residences within 300' of the subject properties. Given the magnitude of this proposed change (approximately 150 additional units), I believe all community members impacted by this effort should be given an opportunity to comment.

In consideration of the significant concerns addressed in Andrea's note below, and the untimely and inadequate nature this notification, I believe our government officials should work to better inform our community soliciting concerns from all affected parties before concluding this rezoning proposition.

Sincerely,

Christopher Hale
106 Lincoln Way, Auburn

On Mar 17, 2024, at 11:08 PM, A G <andreaglassberg@outlook.com> wrote:

To whom this may concern,

186-2

As a North Auburn homeowner living directly across the street from Sites 71 and 72 on Lincoln Way being considered for the Placer County Rezone Project, I am writing to express my vehement opposition to the inclusion of these properties. I believe there are several reasons why these properties are simply unsuitable for this type of project and some additional reasons why such a project at this location would have a substantial negative impact on the character of Auburn as a whole. The currently reported Environmental Impact Report is clearly deficient as it fails to adequately recognize some of these negative impacts that it purports to be investigating and reporting upon.

First, I would like to alert you to two conditions, which I believe make the properties unsuitable for high density housing: wildfire danger and traffic impact.

Strategy WF-5 of the Placer County Sustainability Plan adopted in 2020 requires all large new development projects in Moderate, High, or Very High Fire Hazard Severity
Zones to have multiple points of ingress and egress to improve evacuations and emergency
response access. Sites 71 and 72 are in a High Fire Hazard Severity Zone and do not have multiple points of ingress and egress. Furthermore, they are just on the

edge of the canyon and have very steep topography, making construction very challenging. Those of us already living in the area are finding it essentially impossible to secure fire insurance from a carrier other than California Fair Plan. It would be irresponsible to add additional housing to an area that is essentially uninsurable.

Sites 71 and 72 have a proposed unit density of 142. The entrance to these properties is situated at a blind corner on Lincoln Way where traffic incidents are occurring on a regular basis. Over the past few years there have been a number of serious injury accidents at this location. Putting hundreds of additional vehicles on the road at this dangerous curve is a recipe for more traffic accidents and is simply unsafe.

Initially, when I heard about the project I worried about the negative effects it would have on my view of the American River Canyon from my home across the street, and the adverse impacts on my property's value. I have come to understand that the negative impacts of such a project would be so much more profound for the entire community of Auburn and its visitors.

186-2 cont.

I read the Initial Study and Checklist from the Community Development Resource Agency Environmental Coordination Services and was surprised to see no mention of the very clear detrimental effects a high density housing project will have on the aesthetics of Auburn's landscapes and vistas. The Initial Study Purports to have investigated this topic, yet it makes no mention of the fact that sites 71 and 72 are clearly visible from the Foresthill Bridge, one of California's great landmarks as the highest bridge in the state. Placing a high density housing project at the edge of the American River Canyon where it is visible from the state's highest bridge and one of the area's most treasured vistas shows a complete lack of regard for the beauty of the area and for the community and its visitors. A high density housing project at sites 71 and 72 would ruin the view of the wooded Auburn hillside from the American River Canyon and the Forest Hill Bridge. Such a project would have a substantial negative impact on the areas aesthetics. How can the Environmental Impact Report have failed to recognize this?

Let me be clear, I am not opposed to high density housing or low-income housing in my neighborhood in Auburn. Mere feet from Sites 71 and 72 is a large plot of land on the southwest corner of Lincoln Way and Russell Road that has been for sale for years and appears to be a much more suitable location for higher density housing. It has multiple areas for ingress and egress. The land is flat and would be much easier to build on than sites 71 and 72.

I urge you to reconsider including sites 71 and 72 in the Rezone plan. Take a look at the property on the southwest corner of Lincoln Way and Russell Rd. It could be a much better option with less traffic hazards, reduced fire danger, and lesser negative effects on community aesthetics. The environmental impact report appears to be deficient in its failure to recognize these issues. Our community, the people of Placer County, and the citizens of California deserve better.

Sincerely,

Andrea Glassberg
106 Lincoln Way, Auburn

LETTER 186: CHRISTOPHER HALE

Response to Comment 186-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 186-2
Please see Responses to Comment Letter 174.

Letter 187

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Comments on proposed rezoning along Old Auburn Road in Roseville
Date: Monday, March 4, 2024 8:38:57 AM

-----Original Message-----
From: Blair Halliday <halliday678@yahoo.com>
Sent: Saturday, March 2, 2024 2:36 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Comments on proposed rezoning along Old Auburn Road in Roseville

Kathy Kedinger-Cecil
Senior Planner
Placer County Planning Services Division

187-1 We live in the Castle Creek subdivision (just down the street and on the opposite side of Auburn Road from the proposed rezoning area) and we are very much opposed to this change in the local zoning. Traffic on Old Auburn Road is already very heavy much of the day and during peak commute hours it can be very difficult to enter Old Auburn Road from our subdivision. Not only can it be a major challenge just to get onto Old Auburn Road, it can, at times, be quite dangerous since there is heavy traffic flowing in both directions with very few opportunities to safely enter traffic. Adding scores of new homes, accompanied by the many additional cars, would only add to the traffic challenges and would negatively affect the safety of this thoroughfare and of our neighborhood.

187-2 Additionally, this area of town is composed primarily of single family homes; adding dense housing as is being proposed would profoundly change the atmosphere of this part of town and would not be consistent with the current zoning. Admittedly, California needs more affordable housing options and growth is inevitable. However, given the massive housing developments that have been built in other parts of Roseville (such as west Roseville), it seems that our town is already doing more than its "fair share" of making new housing stock available to the market. It does not seem appropriate to alter the nature of this area of Roseville by adding high-density housing.

We strongly urge you and the Planning Services Division to reconsider this plan. We know that many of our neighbors and other residents of this area feel the same way and we hope that they will also be contacting you soon.

Thank you for your consideration of this matter.

Blair and Madeline Halliday
3305 Lance Court
Roseville, CA. 95661

LETTER 187: BLAIR AND MADELINE HALLIDAY

Response to Comment 187-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 187-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 188

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: We oppose rezoning in rural Dry Creek neighborhood
Date: Tuesday, March 19, 2024 10:58:31 AM
Attachments: Outlook-jqxncesm.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:13 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: We oppose rezoning in rural Dry Creek neighborhood

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: sweeth2o1@gmail.com <sweeth2o1@gmail.com>
Sent: Sunday, March 17, 2024 5:35 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: RE: We oppose rezoning in rural Dry Creek neighborhood

188-1

We would like to elaborate on the reasons for our opposition to rezoning.

A few of the issues we have with rezoning these parcels are 1) there is no infrastructure in place to handle the number of people. An example would be overloading our already full K-8 school. And also, two of the four sites are on two lane country roads with no sidewalk, bike lane or even a shoulder. Apartments bring a lot of children who will have to get to school. We've had 4 fatalities in the past year on our road (one was a pedestrian hit and run less than a month ago). 2) two of the parcels are directly across the street from a K-8 school.

188-2

188-3

188-4

Apartments tend to have a more fluid tenant population. Only the person listed on the lease is background checked. Anyone else who moves in or visits is not background checked so we are potentially allowing pedophiles or other criminals to live in close proximity to a school with kids as young as 5. 3) We live in a rural neighborhood with other like-minded people who understand our lifestyle and share our values. My kids raise animals for 4-H that they show at the county fair, our current neighbors understand this and don't complain about the sounds of a pig squealing or a rooster crowing at 4:30 in the morning or complain about the flies that are inherent when you raise animals, even with the utmost care and husbandry. Move hundreds of people in right on the other side of the fence who don't like hearing roosters crow or don't appreciate when my livestock guardian dog barks to keep a coyote away from his herd of goats and soon WE are the nuisance and our kids no longer get to enjoy the very reason we all moved out here in the first place. Building apartments right next to our pig farm makes no more sense than me building a pig farm right in the middle of the city between two apartment buildings. 4) We are not opposed to building on those properties. The fact is we don't own them. However, there is a general plan for this community that was developed decades ago and those parcels have certain zoning rules for a reason. Most of those parcels are zoned for between 1-4 acre parcels. So build a house or two on each just like the properties to each side. The zoning is there for a reason.

Linda and Sajjad Hamid
mailto:Sweeth2o1@gmail.com
Roseville, CA

From: sweeth2o1@gmail.com <sweeth2o1@gmail.com>
Sent: Sunday, March 17, 2024 12:43 PM
To: supervisorgore@placer.ca.gov; rdahlgren@placer.ca.gov
Subject: We oppose rezoning in rural Dry Creek neighborhood

Dear Ms. Gore and Ms. Dahlgren,

188-5

We strongly oppose the proposed rezoning of rural Dry Creek sites 7, 8, 9, & 10. We moved here because of the low density housing and rural atmosphere.
It's bad enough that so much open space has been developed since we moved here 20 years ago. Enough is enough! We feel there are other areas better suited
to high density/low income housing. If you support this rezoning, you can be sure we will express our displeasure at the ballot box in the next election.

Best regards,

Linda and Sajjad Hamid
mailto:Sweeth2o1@gmail.com
8600 Cook Riolo Road
Roseville, CA

LETTER 188: LINDA AND SAJJAD HAMID

Response to Comment 188-1
Please see Master Response 4 – Traffic Safety and Master Response 6 – Impacts to Local Schools. Please also see Responses to Comment Letter 4.

Response to Comment 188-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 188-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 188-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 188-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 189

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: rezone of sits 71 and 72
Date: Thursday, March 7, 2024 10:55:25 AM

From: Jane Hamilton <janieann389@gmail.com>
Sent: Thursday, March 7, 2024 10:54 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: rezone of sits 71 and 72

189-1 I oppose this rezoning. It will forever change the appeal of the area, not to mention lower the value of existing homes. It will destroy the beautiful acreage by cluttering it.

LETTER 189: JANE HAMILTON

Response to Comment 189-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 190

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Zoning proposed changes
Date: Tuesday, March 19, 2024 10:58:02 AM
Attachments: Outlook-nwjai0hk.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:09 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Zoning proposed changes

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: steve haney <stevehaney9@gmail.com>
Sent: Wednesday, March 13, 2024 10:41 AM
To: Donna Haney <dhaney@scldispatch.com>; Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Zoning proposed changes

Hi Supervisor

190-1

I want to protest the high density proposed housing in the Creekside Area.

People have purchased housing in this area to get away from high density development.

This type of housing should take place

190-1 cont.

closer to the central city area and not
the countryside setting that exists now.
A growing movement will be fighting
this foolish planning, and those that promote it.
I strongly request you deny this request
and promote this on open land much closer to the established already higher density
areas of Roseville.

Steve Haney
3241 Lori Ct, Roseville, CA 95747
408-591-6565

LETTER 190: STEVE HANEY

Response to Comment 190-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 191

From: Greg Harper
To: Placer County Environmental Coordination Services
Subject: Public comment opposed to rezone rm30
Date: Tuesday, March 12, 2024 3:45:17 PM

Public comment

191-1 I am writing to oppose emphatically the proposed RM30 rezone of two properties in Auburn (APN: 054-290-064-000 and 054-290-065-000) named "Lincoln Way Property 1" and "Lincoln Way Property 2." [Also listed as property #71 and #72 in district 5 of the rezone proposal].

There are several glaring reasons why these specific properties should be omitted from the rezone proposal.

Access and use of Lincoln Way.

191-2 The [blind] presentation of these properties to a narrow, hilly, curving road [Lincoln Way] is a significant safety hazard. There are no commercial installations within walking distance and virtually every trip out of these rezoned properties would be by car/vehicle. This community is bike- and walk-friendly and adding the significant traffic burden of ingress and egress onto Lincoln Way is not consistent with the safety expectations and needs of the current users of this relatively quiet rural road.

Inconsistent with neighborhood density and ethos.

191-3 The current density of the immediate neighborhood is more like R1, R2, with single family homes occupying 1/2 acre and larger lots. This is both canyon habitat and fire country (see below). Rezoning to RM30 is not consistent with the rural and habitat nature of the abutting Canyon Creek. One of the most glaring inconsistencies is illuminated by the (collision caused) death of wildlife. The [American River] Canyon is home to many species, they inhabit any wild or wild-adjacent area they find. The Canyon Creek watershed is populated with bear, foxes, turkey, deer, vultures and coyotes, among others. Existing traffic (on Lincoln Way) has resulted in the death of a mother-bear, leaving orphaned cubs. It is not conceivable to allow significant new high density development in an area already impacted by collisions with wildlife on this stretch of curving, rural road. The residents welcome the wildlife and consider their welfare. We are deeply opposed to increased hazard associated with additional vehicular traffic.

Safe egress in Fire country.

191-4 These properties directly abut the canyon and are susceptible to fire. The regrettable siting of the properties at this point on Lincoln Way presents an unacceptable risk and burden to egress (from increased traffic out of the properties) for the local community.

In summary, these are not candidates for rezoning to RM30 for the reasons outlined above.

Respectfully submitted,

Greg Harper

Kyle Herbold
(owners, abutting parcel)

LETTER 191: GREG HARPER AND KYLE HERBOLD

Response to Comment 191-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 191-2
Please see Master Response 4 – Traffic Safety and Responses to Comment Letter 174.

Response to Comment 191-3
Please see Master Response 2 – Social and Economic Impacts, as well as the analyses and conclusions in Chapter 5, Biological Resources, of the Draft EIR. The County appreciates and shares the concerns regarding collisions with wildlife mentioned by the commenter. The species mentioned by the commenter are common wildlife, meaning that they are not afforded special protective status by the federal or state governments. Pursuant to CEQA, the Draft EIR focuses on the project's potential impacts to special-status wildlife species.

Response to Comment 191-4
Please see the analyses and conclusions in Chapter 10, Fire Protection and Wildfire, of the Draft EIR and Responses to Comment Letter 174.

Letter 192

From: jharriman95746@gmail.com
To: Placer County Environmental Coordination Services; Planning Commission
Cc: jharriman95746@gmail.com
Subject: REQUIRE a FULL EIR for Site 26 - rezoning of rural property near Cavitt Jr. High School
Date: Sunday, March 10, 2024 2:27:15 PM

Be RESPONSIBLE!

192-1 In opposition to Placer County seeking to rezone property next to Cavitt Jr. High for 'low' or 'very low' income tenants

LETTER 192: J. HARRIMAN

Response to Comment 192-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 193

GRANITE BAY COMMUNITY ASSOCIATION

P.O. BOX 2704 ★ GRANITE BAY, CALIFORNIA 95746 ★ (916) 791-7427

Kally Kedinger Cecil
Senior Planner
Placer County Planning Services
March 5, 2024

SANDRA HARRIS
ISSUES COORDINATOR

Hi Kally,

The following are comments re Housing Element Amendment

193-1 ***Site 23 – Cavitt Stallman Road Zoned F-B-X acre minimum*** - Land use Rural Estates 4-20 acre min. The southern portion of this parcel is home to a Mega church which generates thousands of vehicle trips weekly. This winter the church added a regional soccer complex with outdoor lighting on the northern portion of the property, the impacts of which haven't yet been realized on the existing residential neighborhood of 1-5 acre lots. The remaining north end of the property is zoned FARM and was designated a passive recreation area to provide a buffer from the noisy fields. This northern portion of the site also includes a wetlands created by Miners Ravine Creek.

193-2 A new sub-division of 89 lots is under construction on the western end of Olive Ranch Road that feeds into the rural Cavitt-Stallman Road which also serves residents from Douglas to Auburn/Folsom Road. Site 23 is already overdeveloped for that area and greatly impacts the roads and residential neighborhoods. To designate it for 64/96 units consisting of multiple stories would result in incompatible uses and the creation of land use conflicts. This high density use is incompatible with the existing character of the low density residential neighborhoods and would cause economic or social changes that would result in significant adverse physical changes to the environment which cannot be mitigated.

193-3 This increased population density necessitates a careful assessment of current and expected resources and the development of a sustainable plan to support that density. A clear strategy for **funding** infrastructure to ensure long-term viability of the added density is necessary. The costs of this added density to an established community plan and the necessary infrastructure to accommodate that density should be made transparent to the taxpayers prior to any zoning changes of this magnitude being made.

193-4 **Sites 25 and 26 –8950 and 8989 - Auburn-Folsom Road** – These two parcels are on opposite sides of Auburn-Folsom Road and should be considered together since they could generate between 382/573 du. This added density would only contribute to that already highly congested area. There are two new high density residential developments, two mobile home parks, the South Placer Fire District headquarters and fire station near the intersection of Auburn and Eureka Road which is also heavily traveled. Fuller Drive serves Cavitt Junior High School, is regularly used by a large residential developments east of Auburn Folsom Road, and provides access to shopping areas for those residents. Fuller Drive also provides an alternative/emergency route for residents east of Auburn-Folsom Road and north of Douglas when lake traffic is bumper to bumper on that 2 lane stretch of Douglas Boulevard which leads into the entrance of Folsom Lake State Park. Those residents are able to cross Douglas and wind through the residential streets to reach Fuller and then gain access to Auburn-Folsom.

193-5 The Auburn-Folsom/Douglas Boulevard corridor through Granite Bay is a quasi-beltway and has more than 50,000 am/pm vehicle trips daily where these 2 sites are located. To develop this area with 382/573 du consisting of 3 or more stories would result in incompatible uses, a strain on fire service equipment, and the creation of land use conflicts. High rise buildings are also incompatible with the Granite Bay Community Plan which does supports 1 story buildings on the Douglas/Auburn-Folsom corridor.

193-6 This high density use is incompatible with existing development in the area and would cause economic or social changes that would result in significant adverse physical changes to the environment which cannot be mitigated. In addition there are 3 existing high density senior complexes operating in Granite Bay with another large one approved and one going through the approval process. There are also around 30 smaller care facilities in Granite Bay. This number of senior care residences is the one of the highest per capita in the County and a strain on the fire department which is struggling at this time to hire paramedics to cover the two South Placer Fire District ambulances. It should be noted that in addition to the two mobile home parks mentioned, Granite Bay has 3 others located in the community.

193-7 In other words, when the Granite Bay Community Plan was developed, consideration was given to numerous types of living and areas were zoned to accommodate many types of lifestyles in an orderly fashion. The community is near buildout and to shoehorn high density residences in the well planned community is poor planning and an insult to the people who bought into the community plan. This increased population density necessitates a careful assessment of current and expected resources and the development of a sustainable plan to support that density. A clear strategy for **funding** infrastructure to ensure long term viability of the added density is necessary. It is noted in HE-52and 54 that streamlining and expediting the approval process; deferral of fees; increased transit access; are objectives with funding from General Fund, State and Federal Grants. Transparency re costs of low to moderate housing at this density should be made known to taxpayers prior to any zoning changes of this magnitude.

193-8 Large scale developments proposed in western Placer County are where the new zoning should be situated. New planned communities have the ability to provide compatible neighborhoods and adequate infrastructure to accommodate the planned growth. Granite Bay is almost built out and plopping this density into existing neighborhoods with no consideration given to the residents, the Community Plan, or impacts to the character of the community violates existing property owners promise that their lifestyles and investments would be protected.

Granite Bay Community Association

Sandra H Harris

LETTER 193: SANDRA HARRIS

Response to Comment 193-1
Please see Master Response 1 – Non EIR/Administrative Issues. The Bayside Fields project did not officially designate a portion of Rezone Site #23 as a park. Any future development at Rezone Site #23 would be outside of the wetland preservation area located in the northern portion of the Bayside Church property.

Response to Comment 193-2
Please see Master Response 1 – Non EIR/Administrative Issues.

Response to Comment 193-3
Please see Master Response 1 – Non EIR/Administrative Issues.

Response to Comment 193-4
Please see Master Response 4 – Traffic Safety.

Response to Comment 193-5
Development proposals do not currently exist for the rezone sites located in Granite Bay. Therefore, assuming that a "high rise apartment" would be developed is speculative and CEQA does not require an EIR to address speculation. Residential developments are required to comply with the Multifamily and Mixed Use Design Guidelines, including standards for height, setbacks, and building design to ensure a high quality design. In addition, funding for services is not an impact pursuant to CEQA.

Response to Comment 193-6
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 193-7
Please see Master Response 1 – Non EIR/Administrative Issues.

Response to Comment 193-8
Please see Master Response 1 – Non EIR/Administrative Issues.

Letter 194

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to proposed 316 unit project on Bell Rd near Presbyterian Church, Auburn
Date: Tuesday, February 20, 2024 9:20:39 AM

From: Michael Hartmann <mh94526@yahoo.com>
Sent: Tuesday, February 13, 2024 8:26 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Opposition to proposed 316 unit project on Bell Rd near Presbyterian Church, Auburn

I am a local home owner. I am sending this email to oppose the proposed 316 unit VLH (Very Low-Income/Homeless Housing) project slated for the area of Bell Road near the Presbyterian Church at the corner of New Airport Road in Auburn.

194-1

These developments bring nothing but rampant crime. Burglaries, armed robberies, thefts, vandalism as well as trash thrown everywhere are common with these projects. This will severely negatively impact property values and retail outlets as well as disproportionately consuming local resources. This does not just impact the immediate area of the proposed project, it will spill over and impact our entire community. We all see homeless people already walking around like zombies, pushing stolen shopping carts, stealing anything they want from local stores with impunity and acting violently towards others. I strongly oppose this project.

Thank you,

Michael Hartmann

LETTER 194: MICHAEL HARTMANN

Response to Comment 194-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 195

From: Doug Hawkins
To: Placer County Environmental Coordination Services
Subject: Housing Rezone Program Dry Creek Community DEIR
Date: Monday, March 18, 2024 12:13:52 PM

Hello,

195-1 I'd like to express my extreme opposition regarding the proposed sites located in the Dry Creek community for rezoning. We've lived in and our children have attended school in this area since 2010. Adding high density housing will dramatically alter our community for the worse. We are very concerned with the added traffic regarding the safety of our children as they walk/ride to and from school as two of the proposed sites are next to the already congested school. The traffic alone in the mornings and afternoons is already almost unbearable for the small community we live in. The streets and egress ways around our community were not planned for the amount of traffic/people already here. The added people and traffic is also a major concern regarding the support service (sheriff/fire) is already stretched thin.

195-2 It is inconceivable that there was no community input regarding these sites and that almost 25% of the proposed sites county wide are within our small community which equates to about .01% of the entire county--how can this even make sense? There are many other better sites within the county and even within the City of Roseville that have way better support regarding stores, mass transportation, utilities, police, fire, schools, etc.

Please take a step back and realistically consider what a detrimental decision this would be to this small community to proceed with any of these sites.

Thank you,

Doug Hawkins
916-302-7061

LETTER 195: DOUG HAWKINS

Response to Comment 195-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety, as well as Responses to Comment Letter 4.

Response to Comment 195-2

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 196

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:05:13 AM

From: Ryan Haynes <ryankhaynes@gmail.com>
Sent: Friday, March 8, 2024 10:57 AM
To: jess.negrete@hcd.ca.gov; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

196-1

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

196-1 cont.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Sincerely,

Ryan Haynes

LETTER 196: RYAN HAYNES

Response to Comment 196-1

Please see Responses to Comment Letter 62.

Letter 197

From: Ryan Haynes
To: Placer County Environmental Coordination Services
Subject: Vineyard Housing Project
Date: Wednesday, February 21, 2024 11:11:12 PM

Hello,

I hope you have received abundant feedback about this development proposal in opposition to allowing it to go forward.

The tiny and rural community of Dry Creek would be devastated by the expansion of such a large influx of people and traffic. The infrastructure does not exist to add such an expansive project. 197-1

I voice the opposition to this project of my household and neighbors in this community.

Please let me know if there are any other actions I can take to voice my opposition.

Sincerely,

Ryan Haynes

LETTER 197: RYAN HAYNES

Response to Comment 197-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 198

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Rezone Direction
Date: Tuesday, February 20, 2024 9:25:02 AM

From: Sophia Heidrich <sophia@mapf.org>
Sent: Wednesday, February 14, 2024 4:56 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Alexis Ollar <alexis@mapf.org>
Subject: Housing Rezone Direction

Hi Kally,

198-1

I was watching the Board of Supervisors hearing yesterday regarding the Placer Housing Rezone and had a few questions for you about the final direction. I know that Supervisor Gustafson recommended continuing to consider the properties in revised Attachment A, as well as properties 71, 72, and 45. What about the remaining properties included in Table 7 (Proposed Rezone Sites but Not Added to Inventory)?

I understand that those properties will continue to be included in the environmental analysis because the DEIR has already been prepared and the analysis is underway, but are they still under consideration to be rezoned? It sounded like the Board discussion supported removing Bell Road from consideration and supported adding the properties along Cincinnati Road to consideration, but there wasn't much discussion about properties 68 and 69, which are two of the properties I am particularly concerned about.

Based on Mr. Pahule's testimony, it also sounds like those properties would not meet HCD's criteria to be included in the inventory, so why would they still be rezoned? Same question goes for property 45, which was added to the motion (why rezone the property if HCD is concerned about displacing current residents and wouldn't likely support adding the parcel to the inventory to satisfy the RHNA?).

Thank you in advance for the information,

Sophia Heidrich
Advocacy Director, Mountain Area Preservation
Mailing Address: P.O. Box 25, Truckee, CA 96160
Physical Address: 10116 Jibboom Street, Truckee, CA 96161
Office: 530.582.6751

www.MountainAreaPreservation.org | Like us on Facebook & Instagram

"I do have reasons for hope: our clever brains, the resilience of nature, the indomitable human spirit, and above all, the commitment of young people when they're empowered to take action." — Jane Goodall

Please consider the environment before printing this email.
CONFIDENTIALITY NOTICE - DO NOT FORWARD OR COPY: The contents of these communications and any attachments are intended solely for the personal and confidential use of the recipient(s) named above. This communication is intended to be and to remain confidential. Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

LETTER 198: SOPHIA HEIDRICH

Response to Comment 198-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 199

3/7/2024

Hello Supervisors of Placer County,

Thank you for taking the time to read this letter,

I am writing to express my deep concerns regarding the proposed high-density, affordable housing development in Penryn. As you are aware, this development, if approved, would significantly alter the landscape of our community and potentially pose numerous challenges to our quality of life.

199-1

There are many issues relating to this project which when completed, would double the population of Penryn. Some of these important issues include: lack of infrastructure, at capacity schools, traffic, increase crime, decreased property value, and air quality.

One critical issue that requires urgent attention is the impact on air quality. The draft Environmental Impact Report (EIR) has shed light on the alarming levels of pollution that would be emitted if these high-density projects proceed. This poses a serious threat to the health and well-being of our residents, particularly vulnerable populations such as children, the elderly, and those with respiratory conditions.

Furthermore, our area is already burdened by existing sources of pollution, including the heavy traffic on Highway 80 and the emissions from Union Pacific railroad tracks. Adding more emissions from densely populated housing developments would only exacerbate the problem and further compromise the air we breathe.

199-2

Clean air is a fundamental human right, and it is incumbent upon us to ensure that any development decisions prioritize the health and safety of our community. Therefore, I urge you to carefully reconsider the approval of these high-density housing projects and to explore alternative solutions that prioritize sustainable development and environmental stewardship.

Parcels 13, 17 and 18 when developed, (two of which to be developed by a company from Southern California), would increase pollution exponentially and contribute to many concerns including air quality.

The Horseshoe Bar/Penryn Community Plan goals are as follows:

Goal 1 Recognize that clean air and water are essential resources for maintaining a high

quality of living. Protect the high quality of air, water, and groundwater resources

consistent with federal, state, and local standards.

Goal 2 Protect and improve air quality in the plan area.

Goal 3 Integrate air quality planning with the land use and transportation planning

199-3

process.

The EIR states "In order to evaluate pollutant emissions from development projects, the (Placer County Air Pollution Control District) has established significance thresholds for polluting emissions of (reactive organics gas), (nitrogen oxides, which are highly poisonous), and (particulate matter). The significant

thresholds, expressed in pounds per day, serve as air quality standards in the evaluation of air quality impacts associated with proposed development projects." All of the projected emissions are over the threshold. One example is reactive organic gas at approximately six times over the accepted limit!

	ROG	NOX	PM10	
Project Emissions	366	203	348	(lbs. per day)
PCAPCD Significance Threshold	55	55	82	

I99-3 cont.

These dangerous emissions are categorized as significant and unavoidable. This is the same thing that was said about the over-the-top emissions connected to the Project 8 winery. Will future developments in Placer county be approved with these serious air quality issues that put our residents at risk of respiratory problems, cardiovascular disease and many other ailments?

I99-4

I suggest, if we are being saddled with this Rezone Project, that we dictate that these properties be senior housing at the minimum units per acre which would help mitigate some of these issues.

Thank you,

Ann Henderickson

1497 Sisley Rd. Penryn, Ca

rustyartgal@gmail.com

916-663-3422

LETTER 199: ANN HENDERICKSON

Response to Comment 199-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 6 – Impacts to Local Schools.

Response to Comment 199-2

The analysis of potential health effects of criteria pollutants is discussed under Impact 4-4 of the Draft EIR, which begins on page 4-53. The Draft EIR also includes an evaluation of health risks related to toxic air contaminants (TACs) in the Air Quality and Greenhouse Gas Emissions chapter, starting on page 4-50. As detailed therein, the proposed project would not result in the generation of any substantial pollutant concentrations during the operation of any future potential development within the rezone sites. In addition, while short-term, construction-related activities could result in the generation of TACs, specifically diesel particulate matter (DPM), from on-road haul trucks and off-road equipment exhaust emissions, due to the temporary nature of construction and the relatively short duration of potential exposure to associated emissions, the potential for any one sensitive receptor in the area to be exposed to concentrations of pollutants for a substantially extended period of time would be low. Thus, future potential construction on each rezone site would not expose nearby sensitive receptors to substantial TAC emissions.

In addition, as further discussed in the Air Quality and Greenhouse Gas Emissions chapter, given that details regarding the extent of construction activities associated with future development of the rezone sites is not available at this time, the Draft EIR includes Mitigation Measure 4-1, which would ensure that construction activities associated with future development of the rezone sites would not substantially contribute to the PCAPCD's nonattainment status for ozone or PM by requiring a site-specific construction emissions analysis for any future site-specific development plans, designs, or proposals that would result in more than 35 acres of ground disturbance and/or would include any of the criterion listed therein. Similarly, implementation of Mitigation Measures 4-2(a) and 4-2(b) would help to reduce operational criteria pollutant emissions that would occur from future potential development of the rezone sites to the maximum extent feasible by requiring site-specific development proposals to implement all mitigation measures as determined feasible for mobile and area source emissions identified in the Placer County Air Pollution Control District's (PCAPCD) CEQA Air Quality Handbook, the Placer County Sustainability Plan: A Greenhouse Gas Emission Reduction Plan and Adaptation Strategy (PCSP), the California Green Building Standards Code, Actions A4.203.1.2.1 and A5.203.1.2.1 of the CalGreen standards, and/or other just as effective options as they become available, as well as prohibiting the use of wood-burning fireplaces or stoves, and conventional open-hearth fireplaces. Implementation of the aforementioned mitigation measures would ensure that any impacts associated with future development of Parcels #13, #17, and #18 would be reduced to the maximum extent feasible.

It should further be noted that, as discussed on page 4-47 of the Draft EIR, the maximum unmitigated operational emissions associated with reasonably foreseeable future buildout of the rezone sites presented in Table 4-9 include emissions that would result if 74 rezone sites were developed at 30 units per acre, for a maximum buildout of 7,503 units on 250.1 acres. The final list of sites to be rezoned contains significantly fewer properties and acreage as the list has been substantially refined. As a result, the total emissions shown in Table 4-9 is a conservative worst-case scenario. Furthermore, regulations pertaining to air quality emissions, including, but not limited to, Building Energy Efficiency Standards and State and federal vehicle standards, have been getting progressively more stringent over time. Thus, as future development of the rezone

sites occurs under the increasingly stringent regulations, such development is anticipated to be increasingly energy efficient over time as well. As a result, the emissions presented in Table 4-9 are likely an overestimation.

Response to Comment 199-3

Please see Response to Comment 199-2.

Response to Comment 199-4

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 200

From:	Desiree Hennessy
To:	Placer County Environmental Coordination Services; Kally Kedinger-Cecil
Cc:	Nicolaus Ayles; Rob Potter; carole_potter@yahoo.com; jenniferayles1@gmail.com; sep5@icloud.com; tamluvz2hike@gmail.com; mtnnora1@gmail.com; char_schmidt@att.net; ckd7900@gmail.com; scarekrowktm@outlook.com; SawWhite19@gmail.com; auburntommy@gmail.com
Subject:	Comments in response to Rezone Draft EIR (Site 34 specific) Hennessy and neighbors
Date:	Monday, March 18, 2024 1:53:01 PM
Attachments:	Hennessy Comment Letter to Rezone EIR 3-17-24 with addl signatures.pdf

Dear Shirlee and Kally,

200-1 We have attached a letter expressing our concerns after reviewing the draft EIR related to the Housing Elements Site Rezone project. We are all property owners along Hidden Meadows Circle, Homestead Way and Natalie Court in Auburn. Our properties border Site 34 Canal Street which remains on the list of sites being considered for rezone to the newly designated classification or RM30.

Sincerely,
Desiree Hennessy and neighbors
12301 Hidden Meadows Circle, Auburn
desinauburn@gmail.com

March 17, 2024

Placer County Community Development Resource Agency
Via email to cdraecs@placer.ca.gov

We are opposed to the rezone of Site 34 Canal Street to the newly designated Zone of RM 30 (Residential Multi-family 30 units per acre).

200-2 Site 34 has neighboring single family homes on 3 sides of this parcel. The majority of these are one story in height. The potential build of 248 – 372 units on this 12.4-acre parcel will significantly impact the existing homeowners and renters' ability to continue quiet enjoyment of their home. Many of the neighboring properties (within 300 feet of parcel) were not notified of this potential rezone until we requested this at the February 22, 2024 hearing. We received notification dated 2-27-24 in the mail on 2-29-24. Our comments / concerns are detailed below:

200-3
- **General / Calculations** – Site 34 Canal Street APN 038-104-095-000 is listed in the Draft EIR as 12.8 acres but reflected as 12.4 acres in the County Records. This discrepancy needs to be corrected. Additionally, the majority of the analysis presented on the County website, and in communications to the public lists this site as 5.6 acres. Through discussions and emails with the County Planning staff it was explained that there are limitations to development of this site (due to wetlands) that ***might*** not allow for all 12.4 acres to be developed. The planning staff had to be conservative in their calculations of units available for the Regional Housing Needs Analysis (RHNA) shortfall, so they used the 5.6 acres. However, this is extremely misleading to the general public and to the neighboring residents who will be impacted greatly. 5.6 acres at 20 units per acre (as reflected in County presentations) is 112 units. If the full 12.4-acre parcel is developed at 30 units per acre, there will be 372 units.

200-4
- **Air Quality** - Site 34 is within an area of Naturally Occurring Asbestos (NOA) as designated on the PlacerAir.org NOA Maps which can be found at:
  - https://www.placerair.org/Faq.aspx?QID=155
  - https://www.placerair.org/1629/NOA-Maps-Resources
    - *Click on the North Auburn link to see the map*
  - The Map indicates that this site is in an ***"Area Most Likely to Contain NOA includes ultramafic rock and serpentine rock (serpentinite), and associated soils, which are most likely to contain NOA."***
  - Section 4 of the Draft EIR "Air Quality and Greenhouse Gas Emissions" identifies 23 rezone sites within areas of moderate to high levels of NOA. All but 4 of these sites have now been removed from the current candidate rezone list. Site 34 Canal Street is the only site that is "most likely" to contain NOA.
  - The Draft EIR does not list the requirement of an Asbestos Dust Mitigation Plan to address the likelihood of exposing Asbestos during any construction on this parcel.

1

200-5

- **Noise pollution** – The analysis prepared by Saxelby Acoustics LLC included in Appendix H of the Draft EIR does not accurately represent the anticipated increase in noise to the surrounding residential neighborhoods once a project of this density would be completed. The decibel readings included in the analysis were taken in the vicinity of Luther Road and Highway 49 both of which are heavily traveled roadways. Additionally, the western section of the parcel closest to Highway 49 (by Canal Street) is primarily commercial. The Final EIR needs to measure the decibel readings in neighborhoods surrounding the parcel on the North, East and South sides and then determine if the change in noise would be considered "significant".

200-6

- **Noise pollution during construction** - the planned increase in noise during construction was determined to be "significant" in Appendix H of the Draft EIR. It is stated that this would be unavoidable and would occur only during daytime hours of 7 a.m. to 7 p.m. With many people now working remotely from home, this would significantly impact the residents' ability to work from their homes. I recommend that the hours of construction be limited to no more than 8 hours per day, and that a larger buffer zone be established near residential neighborhoods.

200-7

- **Inadequate drainage infrastructure** – The Draft EIR was completed via 'drive-by' and therefore the analysis may not accurately reflect the drainage issues related to this parcel. Site 34 Canal Street sits lower than the residential developments along Hidden Meadows Circle, Homestead Way, and Natalie Court and rain run off naturally flows to this parcel. Additionally, the Draft EIR identifies 3.6 acres of this site as Riparian Wetland. During the most recent rain storms in February, a large portion of this parcel was fully saturated for days.

200-8

- **Biological Resources** – Attachment C to Appendix G of the Draft EIR details the unique biological resources of Site 34 including 3.6 acres of Riparian Wetlands. There is a total of 10.4 acres of the 12.4-acre parcel which is considered PCCP Special Habitats as designated in the Placer County Conservation Program (Riverine/Riparian 4.8 acres, Riparian Buffer 5.1 acres, and Stream System of 0.5 acres). Due to some of the limitations on this site, the Planning Dept staff has made a determination that only 5.6 acres should be included in their calculation of possible units to include in the Regional Housing Needs Analysis (RHNA) shortfall. However, once the rezone is applied to the whole parcel of 12.4 acres, there is nothing that precludes a developer from building 30 units on all 12.4 acres. This would provide for 372 units to be built here.
    - Appendix C lists out the Special Status Species with potential to occur of 9 plants, 2 invertebrates, 1 amphibian, 2 reptiles, 2 birds, and 5 mammals. Additionally, this parcel includes 7.7 acres of Oak Savannah. Destroying this habitat is of great concern to us.
    - We are concerned about the destruction of the wetlands specifically, and asked County Planning staff about the protection of this area. Their response was *"Under the PCCP, projects can be mitigated through payment of in-lieu fees, however the fees for aquatic resource impacts are very high and developers will avoid impacting aquatic resources to the maximum extent possible."* We did not have sufficient time to review the PCCP and fully understand the implications, but the "in-lieu' mitigation fees are not that significant when a 'per acre' mitigation fee is applied to 20 or 30 units built on each acre. As a result of this, we are concerned that any developer would not have the financial incentive to avoid destruction of these special habitats.

Comments to the Placer County Housing Elements Site Rezone Draft EIR – from Hennessy and neighbors

- This parcel includes 1.1 acre of Valley Oak Riparian Woodland which is considered a "sensitive natural community" by California Dept of Fish and Wildlife (CDFW).
  - Per Section 6.3.10 The Biological Resources Assessment of the Draft EIR it states that "impacts to these communities are regulated under Fish and Game Code 1600. If Valley oak riparian woodland will be impacted by a project, the applicant shall apply for a Section 1600 Lake and Streambed Alteration Agreement (LSAA) with CDFW. The applicant shall comply with all conditions of the LSAA, and mitigation for impacts to Valley oak riparian woodland shall result in no net loss of those habitats. This requirement has not been listed in the Anticipated Mitigation Measures and should be identified in the site analysis.
  - Section 6.3.9 of Appendix G – Biological Resource Assessment of the Draft EIR discusses Native Trees and Oak Woodlands. There are various requirements re: Individual Tree Mitigation and Oak Woodland Mitigation which has not been addressed in the site analysis.

200-8 cont.

- **Rezone Sites Ranking Scores** – Table 6 of Appendix F of the Draft EIR reflects scores associated with 11 criteria. We have concerns about the methodology and accuracy of some of the rankings associated with Site 34 Canal Street. For Environmental considerations, this site was ranked 8 out of 10. Given that the site has been determined to be in an area **most** likely to contain naturally occurring asbestos, along with the points listed above in the Biological Resources comments, a ranking of 8 out of 10 seems unusually high. We would like to request that this be reevaluated. Additionally, the site was ranked 3 (out of 10) for Safety and Emergency Services which does seem appropriate. However, the methodology used for the ranking is simply to add up the scores from each criterion with no weighting of any criteria. It would seem that access to Safety and Emergency services should have a higher weight vs other criterion.

200-9

This letter is by no means inclusive of all our concerns regarding the proposed rezone of Site 34 Canal Street to RM30. However, due to the late notification to the neighboring parcels *(notification letter from the County was not dated until 2-27-24 and not received by us until 2-29-24)*, we did not have sufficient time to digest all sections of the Draft EIR. A significant concern which we did not address is the impact to traffic in the area, the proposed ingress / egress points to this parcel, and the effect that the increase in traffic and traffic patterns would have to the safety of the existing individuals in the surrounding neighborhoods. All that comes to mind is the human lives that were lost during the most recent Maui fire and the Paradise fire when there was insufficient road access to flee the fire. This must be addressed if this parcel continues to be a candidate for rezone to the density proposed.

200-10

Respectfully submitted by:

Desiree Hennessy, Tom Hennessy

Desiree Hennessy, Tom Hennessy
Property Owners of 12301 Hidden Meadows Circle, Auburn
desinauburn@gmail.com

Please also see additional signatures attached from concerned homeowners along Hidden Meadows Circle, Homestead Way and Natalie Court as part of this submission.

3

Comments to the Placer County Housing Elements Site Rezone Draft EIR – from Hennessy and neighbors

Carole Potter Carole Potter carole_potter9 yahoo.com
Frank Henderson scarckrpwkt m@ outlook.com
Colleen Henderson CKd7rp@gmail.com
Jennifer Ayles jenniferayles1@gmail.com
Nick Ayles NICANDSAYLES1@YAHOO.COM
WR Potter wrpotter2@gmail.com
Stephen Pettigrew
SEPSCIcloud.com
Tammy Montoya
Tammy Montoya tamluvz2hike@gmail.com
Sara White sawwhite19@gmail.com
Sara White mtnnora1@gmail.com
Charlene M. Schmidt CHAR_SCHMIDT@ATT.NET

LETTER 200: DESIREE HENNESSY

Response to Comment 200-1

The comment is an introductory statement and expresses general concerns regarding the project but does not specifically address the adequacy of the Draft EIR. The comment notes that neighboring properties were not notified about the rezoning prior to the February 22, 2024 hearing. Please see Housing Element Appendix F, Page F-11 details the outreach and noticing conducted during the rezone program. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 200-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 200-3

The comment correctly notes that Rezone Site #34 has constraints such as wetlands. While the Draft EIR assumes future residential development on the rezone sites, the proposed project does not include any site-specific development plans, designs, or proposals. Future applications will determine the development potential of the rezone sites and the estimated unit counts could change. Therefore, the Draft EIR uses a conservative estimate of potential unit counts for the rezone sites.

Response to Comment 200-4

As discussed in Impact 4-1, the County's standard conditions of approval require grading plans to include the following note:

- Prior to construction activity, a Dust Control Plan or Asbestos Dust Mitigation Plan shall be submitted to the Placer County Air Pollution Control District (APCD) when the project area to be disturbed is greater than one acre. The Dust Control Plan shall be submitted to the APCD a minimum of 21 days before construction activity is scheduled to commence. The Dust Control Plan can be submitted online via the fill-in form: http://www.placerair.org/dustcontrolrequirements/dustcontrolform.

Furthermore, as discussed in Impact 4-3, the potential exists for construction workers or nearby sensitive receptors to be exposed to asbestos if rocks within the 23 mentioned rezone sites contain asbestos, as future grading and construction activities could release asbestos fibers into the environment if not properly controlled.

The CARB Asbestos ATCMs for Construction, Grading, Quarrying, and Surface Mining Operations (17 CCR 93105), was developed to prevent hazardous situations resulting from earth disturbance in areas containing NOA. For projects that could create a hazardous situation through disturbance of asbestos-containing rocks, the ATCM requires an Asbestos Dust Mitigation Plan, which is subject to review and approval by the PCAPCD, as well as implementation of dust control practices in areas where asbestos is found or likely to be found. PCAPCD Rule 228, Fugitive Dust, sets forth requirements necessary to comply with the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations.

The proposed project would be required to comply with the CARB Asbestos ATCMs for Construction, Grading, Quarrying, and Surface Mining Operations, as well as PCAPCD Rule 228, which would minimize the potential for construction workers or nearby sensitive receptors to be exposed to asbestos during future construction activities. However, because the proposed project does not include any site-specific development plans, designs, or proposals, proper compliance with the aforementioned regulations cannot be ensured at this time, the proposed project could expose sensitive receptors to substantial pollutant concentrations related to NOA. Therefore, the Draft EIR requires implementation of Mitigation Measure 4-3, which would ensure that prior to the approval of improvement plans for any future development on Rezone Sites #34 through #36, #42, #43, #49, #51, #56 through #67, and #70 through #73, a qualified geologist or geotechnical engineer shall be retained to conduct additional geologic evaluations of the site to determine the presence or absence of naturally-occurring asbestos. In the event that naturally-occurring asbestos is located on-site or on any off-site improvement areas where infrastructure construction or installation would occur, an Asbestos Dust Mitigation Plan shall be prepared and submitted to the PCAPCD and the Placer County Community Development Resource Agency for review and approval. With implementation of Mitigation Measure 4-3, impacts related to asbestos would be reduced to a less-than-significant level.

Response to Comment 200-5

The commenter misunderstands the programmatic noise analysis conducted for the proposed project. Decibel readings were not taken in the vicinity of Luther Road and Highway 49. Rather, the Noise Study used the state-of-the-art SoundPLAN noise model to estimate the operational noise (on-site vehicle circulation and HVAC) that would result from a conceptual multi-family project at Rezone Site #47 (355 Silver Bend Way in Auburn). As shown by Figure 7-1, Figure 7-2, and Figure 7-3, the noise levels for a conservative multi-family residential development scenario are not expected to exceed the applicable Placer County exterior noise level standards at nearby receptors. The foregoing noise modelling is considered conservative, as shielding was not assumed for buildings, whereas in a real development scenario, shielding of HVAC systems could be implemented. The same conclusions would be expected for Rezone Site #34 given that operational noise associated with residential uses is relatively minimal and the predicted noise levels for Rezone Site #47 were rather substantially below the County's applicable noise standards. Further, as noted by the commenter in Comment 200-7, Rezone Site #34 sits lower than the residential developments along Hidden Meadows Circle, Homestead Way, and Natalie Court, which could help to shield adjacent properties from some of the operational noise generated on-site.

Response to Comment 200-6

With respect to construction noise, Placer County Code Section 9.36.030(A)(7) exempts noise sources associated with construction activities, provided that such activities occur between the hours of 6:00 AM and 8:00 PM, Monday through Friday (during daylight savings), 7:00 AM and 8:00 PM, Monday through Friday (during standard time), and 8:00 AM and 6:00 PM, Saturday. The exemption is provided on the basis that all construction equipment is fitted with factory-installed muffling devices and maintained in good working order. All noise-generating project construction equipment and activities are reasonably assumed to occur pursuant to Placer County Code Section 9.36.030(A)(7) and would, thereby, be exempt from the applicable noise level criteria.

As discussed in Impact 7-1, the proposed project could generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local



general plan or noise ordinance, or applicable standards of other agencies. Implementation of Mitigation Measure 7-1 would reduce the potential temporary noise impact. However, the effectiveness of the measure would vary from site to site and may not prevent ambient noise-level increases due to project construction from exceeding 5.0 dBA, the established threshold, relative to existing levels. This, however, may be achievable at Rezone Site #34, and would be determined at a later date should a residential development application be processed and reviewed by the County for the site. As discussed in Impact 7-1, the EIR conservatively concluded that the potential impact would remain significant and unavoidable.

Response to Comment 200-7

Mitigation Measures X-1 and X-2 of the Initial Study require preparation of a Final Drainage Report prior to the approval of each future development project. In general, the Final Drainage Reports would specify the existing conditions of each rezone site, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from each project, as well as water quality protection features and methods to be used during construction, and long-term post-construction water quality measures.

Response to Comment 200-8

The County appreciates the commenter's concerns about the potential for future residential development on Rezone Site #34 to impact existing riparian wetland and valley oak riparian woodland habitats. As noted by the commenter, any impacts to these habitats would require PCCP compliance and implementation of applicable measures set forth in the Draft EIR, such as Mitigation Measures 5-3(a) through 5-3(d), Mitigation Measure 5-4, and Mitigation Measures 5-4(b) through 5-4(j). The commenter's concerns have been forwarded to the decision-makers for their consideration.

Response to Comment 200-9

A total of 23 of the 74 rezone sites have been identified within areas with moderate to high potential to contain NOA. Potential future construction of residential units within the rezone sites would result in ground disturbance, which could release NOA into the air if present, thereby potentially exposing construction workers to such contaminants, if ground disturbing activities occur on a site that contains NOA.

Future development on several sites would require implementation of Mitigation Measure 4-3:

> Prior to the approval of improvement plans for any future development on Sites #34 through #36, #42, #43, #49, #51, #56 through #67, and #70 through #73, a qualified geologist or geotechnical engineer shall be retained to conduct additional geologic evaluations of the site to determine the presence or absence of naturally-occurring asbestos. The geologic evaluations shall include the rezone site and any off-site improvement areas where infrastructure construction or installation would occur. In the event that naturally-occurring asbestos is located on-site or on any off-site improvement areas where infrastructure construction or installation would occur, an Asbestos Dust Mitigation Plan shall be prepared and submitted to the PCAPCD and the Placer County Community Development Resource Agency for review and approval. The Asbestos Dust Mitigation Plan shall comply with the PCAPCD's "Asbestos Dust Mitigation Plan Guidance" document, which provides performance standards for ensuring that adverse impacts do not result from asbestos dust during construction. The plan shall address compliance with PCAPCD Rule 228, Fugitive Dust, and the CARB's Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations.

Response to Comment 200-10

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

In addition, potential impact related to emergency evacuation are evaluated under Impact 10-2. As discussed therein, the majority of the proposed rezone sites are located in areas with multiple avenues of ingress and egress that provide sufficient emergency evacuation routes.

The proposed project does not include any site-specific development plans, designs, or proposals at this time. As such, there are no proposed ingress/egress points for this site. Future development proposals would be reviewed by the serving fire department or district for adequate access on individual sites. All new developments that occur within the County would be required to comply with all applicable design standards as part of constructing or modifying the transportation system. For example, Policy 3.A.2 of the Placer County General Plan requires all streets and roads to be constructed in accordance with General Plan, community plan, and specific plan standards. The County also has adopted roadway and encroachment standards in the Placer County Land Development Manual. The manual was recently updated in 2023 to reflect current roadway and encroachment standards. At such time that a residential development application comes forward for Rezone Site #34, the County would review the design to ensure all points of ingress/egress, including emergency vehicle access, are provided in conformance with County standards to ensure no adverse effects to future occupants as well as existing residents.

Letter 201

March 5, 2024

Property #26
8989 Auburn-Folsom Road
Granite Bay

I would like to comment upon this item specifically addressed in the Ranking Criteria for the above-caption property:

Transportation Accessibility: Rated 8

PLEASE RECONSIDER FOR THESE REASONS:

The proximity to public transportation (buses, light-rail) is 0. Unless the government plans on subsidizing Uber there is no public transportation available to people who do not own a car.

201-1

Walkability to essential amenities: There is ONE premium grocery store within walking distance certainly not within budget considerations for low and very-low income. There is one junior high school with limited resources to provide services to non-English speaking students. There are no health care facilities closer than 4.8 miles away.

As for accessibility to major roads and highways. This property is located on Auburn-Folsom Road that was widened to its maximum 16 years ago and peak hours is already bumper to bumper, endangering drivers and pedestrians. Adding another 700 people to this area is foolish.

We are a rural community of home-OWNERS who take pride in where we live, the quality of life we have and the safety and well-being of our residents. It is unfair to saddle an area such as ours that is ill-equipped nor ready for the problems that high density housing brings and forever changes our community.

Donna L Hogue
Business Owner
Granite Bay Homeowner for 37 years
dlhogue@yahoo.com

LETTER 201: DONNA L. HOGUE

Response to Comment 201-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 202

From: craig@allsierra.com
To: Placer County Environmental Coordination Services
Cc: craig@allsierra.com; "pneifer"; nita@allsierra.com; craig@allsierra.com
Subject: Rezoning
Date: Tuesday, February 20, 2024 7:56:06 AM

Placer County Planning Commission,

Those of us that are project managers for large and costly projects with severe constraints that are not easily mitigated, know the importance of starting the planning process early, and breaking down all the major components of the process into manageable elements (*how to eat an elephant).* At this point in time, the county's back is against the wall, trying to force perhaps more than two years of difficult planning and execution into just a few months. There will be many hard lessons learned going forward because we did not start the process as early as we should have.

Based on comments I have received from local residents that have done summary evaluations of the information currently available, it appears that significantly more public and institutional comment will be required as more information is available. The decisions being made to meet the highly compressed schedule along with the severe constraints of the State's mandate will likely produce a host of "unintended consequences".

202-1

As the process continues to evolve, evaluations from leadership of all affected parts of our infrastructure (police, fire, schools, small and larger business, schools, transportation, non-profits, and non-governmental organizations) should be engaged to help ensure that all reasonable considerations have been evaluated and mitigated where conflicts with our master plans and current regulations exist.

Costs associated with "low-cost housing" in medium to high-cost communities will always be a major hurdle (square peg, round hole). Costs of the final products should be within reach of the residents they are planned for, without governmental assistance and more taxes on the parts of the communities that pay those taxes. California is already taxing its residents well beyond reasonable levels. Appropriate rezoning plans should meet this requirement.

Site-specific plans and their associated impacts should also be evaluated early in the planning process. Expecting a result or goal that is in significant conflict with the requirements and costs involved will doom any project plan. Effective project managers understand this.

Some of the most significant challenges that may <u>not</u> be mitigated in the time remaining include:

202-2

- Planning and building the physical infrastructure in rural areas to accommodate large increases in a population of families that meet the "limited income" requirements,

202-3

- Identifying and implementing the additional safety and security infrastructures (police, fire, schools, medical) and securing the required revenue to meet the additional budget requirements,

202-4 | • Identifying and addressing the transportation needs of many very young and very old residents of limited means,

202-5 | • Are the results of the increased population areas within the planned capacities for power, water and sewer requirements,

202-6 | • And, at the bottom line, will the costs associated with all of the State mandates be within the means of its low-income residents, and the budgets of Placer County?

Respectfully,

Craig and Nita Hollyfield
Newcastle, CA
916 296-9142

LETTER 202: CRAIG AND NITA HOLLYFIELD

Response to Comment 202-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 202-2
Please see Master Response 1 – Non-EIR/Administrative Issues. It is also noted that potential impacts associated with the proposed project related to population and housing, and utilities and service systems are discussed in Sections XIV and XIX, respectively, of the Initial Study (attached as Appendix A of the Draft EIR), which was prepared for the proposed project.

Response to Comment 202-3
Potential impacts associated with the proposed project related to public services such as police and sheriff protection are discussed in Section XV of the Initial Study (attached as Appendix A of the Draft EIR), which was prepared for the proposed project. Please note that revenue sources is not a CEQA issue. CEQA is focused on potential impacts to the physical environment. This is described further on page 10-35 of Chapter 10, Fire Protection and Wildfire, of the Draft EIR.

Response to Comment 202-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 202-5
Potential impacts associated with the proposed project related to population and housing, and utilities and service systems are discussed in Sections XIV and XIX, respectively, of the Initial Study (attached as Appendix A of the Draft EIR), which was prepared for the proposed project.

Response to Comment 202-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 203

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HD Housing on Lincoln Way
Date: Thursday, March 14, 2024 2:23:18 PM

From: d holmgren <dholmgren538@gmail.com>
Sent: Thursday, March 14, 2024 6:27 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>
Subject: HD Housing on Lincoln Way

203-1

Hello, we understand there is potential for a high-density housing development off of 85 Lincoln Way in Auburn. We believe this would be a proverbial 10 lbs stuffed into a 2 lb bag, with a negative effect on the neighborhood it would be crammed into. Furthering the negative effect would be the dangerous traffic situation on a tight two-lane road unequipped to handle high volumes of turns into and out of such a development, on a curve, from either direction.
A much better use for this location would be for a neighborhood park (or dog park), which would add value to the local community, rather than downgrade it.

We hope common sense will prevail as you make your decisions on this matter, and encourage the developers to find a much more suitable location - if HD housing is truly a necessity in our area.
Thank you for your consideration,
Dale & Jane Holmgren
Olive Orchard Dr. / Auburn

LETTER 203: DALE AND JANE HOLMGREN

Response to Comment 203-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, and Responses to Comment Letter 174.

Letter 204

From: validated@surewest.net
To: Placer County Environmental Coordination Services; Planning Commission
Subject: Property 26 and beyond in Granite Bay
Date: Saturday, March 9, 2024 12:57:08 PM

Hello,

As you have probably noticed, Granite Bay residents are now kicking up their heels as this shocking information of the proposed development of a 5 story "low, low" income housing apartment at the corner of Fuller and Auburn Folsom Road (aka Property 26) is coming to light. I would have thought the community, that will be heavily impacted, would have been notified at some point. I do not recall such a notification.

Why is the site at Property 26, one of the busiest corners and intersections in Granite Bay, being considered for this Low, low income housing? It is truly amazing to think that, if the proper assessment had been done, this would never be coming up for a vote in the first place. If the environmental and human affect, in addition to placing a 5 story building in the heart of the Granite Bay community, had been researched and proposed to the community properly , this would never have been a consideration.

204-1

What is the financial and human impact to the community of trying to change the demographic of Granite Bay? The needs of "low" or "low, low" income individuals are clearly different than what Granite Bay has to offer. So, why Granite Bay in the first place?? Where will these people work? What will there transportation be? There is no public transportation access, there are no jobs nearby. There is much more to trying to provide assistance to this demographic than just a subsidized apartment.

Driving around Granite Bay ,and the surrounding areas, it is apparent that it is already busting at the seams with development, people and traffic. Especially the horrible traffic where you are proposing at the corner of Fuller and Auburn Folsom road. How many people is your plan attempting to inject into the community? Has the proper review been done on the addition of humans on our streets and for our services. Besides traffic, our basic services such as doctors, hospitals, police , fire and retail are already stretched to serve the community. Do we have a fire department with the proper equipment to reach a 5 story building?

204-2

Attempting to completely change Granite Bay and the surrounding areas comes at a tremendous cost to the tax payers, traffic, human and natural environment, and community services. What is the environmental impact to our wildlife and creeks that populate this land? What is the benefit to the taxpayer and the communities for your developments? If there is no benefit to the community why would this be done in the first place?

204-3

I am sorry this hasn't come to my attention long ago, if so I may have had these answers. As a very concerned 20 plus year resident of Granite Bay, living a stones throw from Property 26, I would like to see the EIR as required by the state of California . In addition, please advise on my concerns.

204-4

Thank you for your time,
Valerie Houghton

LETTER 204: VALERIE HOUGHTON

Response to Comment 204-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 204-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

In addition, potential impacts associated with the proposed project related to public services such as police and sheriff protection are discussed in Sections XV of the Initial Study (attached as Appendix A of the Draft EIR) prepared for the proposed project.

Furthermore, as discussed in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, 13 of the proposed rezone sites, including Rezone Site #26, will be served by the South Placer Fire Protection Department (FPD). As discussed therein, although the South Placer FPD owns a ladder truck, the district currently lacks the funding to operate the vehicle. As such, although adequate physical facilities and equipment exist to serve the proposed development, due to lack of funding, such facilities are not currently operational. While funding is not a CEQA issue, it is important to note that the South Placer FPD collects development impact fees on new construction within the district, which goes towards expanding the South Placer FPD's facilities, apparatus, and equipment in order to maintain its existing level of service. Payment of the foregoing fees would contribute towards providing the necessary funds to bring the currently closed fire stations and unmanned ladder truck back to operation.

Response to Comment 204-3

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. In addition, potential impacts associated with the proposed project related to biological resources, such as wildlife and creeks located throughout Placer County are discussed in Chapter 5, Biological Resources, of the Draft EIR. Please also see Response to Comment 52-2 regarding biological resources on Rezone Site #26.

Response to Comment 204-4

An EIR was prepared for the proposed project pursuant to CEQA. Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 205

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HE-1, Site #26
Date: Tuesday, March 19, 2024 8:37:00 AM

From: Daniel Howell <danhowell13@gmail.com>
Sent: Friday, March 15, 2024 11:02 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: HE-1, Site #26

Dear Kally,

By now I am sure you have received the email below from many residents. While I understand the situation you and the supervisors are in, I agree with everything written here and have added a few additional notes that I think are relevant. My additions are in red. I implore you and the supervisors to find alternative locations for this development as this particular parcel will have a lasting and damaging impact to not only Granite Bay, but to all of Placer County in lost revenues and increased costs, none of which our county can afford.

I'm writing to you today about the proposed Housing Element Program (HE-1), and more specifically the Draft EIR, which lists Site #26 in Granite Bay as a top choice to place hundreds of 'low income' & 'very low income' multi-family housing units. https://www.placer.ca.gov/DocumentCenter/View/77692/Housing-Element-Appendix-F?bidId=). This site is 17 acres on the corner of Fuller Drive and Auburn Folsom Road (8989 Auburn Folsom Road).

205-1

Respectfully, for the safety of ALL current and future citizens in Granite Bay and Placer County, this site needs to be REMOVED from the candidate list immediately.

As a citizen of Granite Bay living a couple hundred yards away from this proposal, as well as someone who has 3 daughters in the local school system, I'd like to share grave concerns about this proposal, and why the entire community of Granite Bay does not think this is in the best interest of anyone in Placer County:

#1 SAFETY

a) **Placing 'very low income' housing bordering a SCHOOL is incredibly reckless and will absolutely lead to an increase in crime and severely impact the safety and well being of the children who attend Cavitt Middle School.** Many of the kids walk, ride their bikes and scooters to school every day. Putting high-density, low-income housing right where these kids are every school day is a recipe for disaster.

205-2

b) Auburn-Folsom Rd functions like a highway, with cars easily going 60-70mph on a regular basis. Where are the kids who would live in this proposed development going to play? The answer is on and around Auburn-Folsom, and **you will sadly see an increase in fatalities along the corridor, many of whom likely will be children.** This again is beyond reckless.

205-3

#2 LACK OF INFRASTRUCTURE

205-4 a) **Auburn-Folsom Rd is not equipped to handle the additional presence of hundreds of cars a day at the intersection with Fuller Drive.** According to the Placer County website, this area is already the most congested section of all of Placer County by nearly 5X of the second most. What is already jammed every single morning will turn into utter chaos, which will then require additional law enforcement resources that the county simply does not possess. That is the intersection my family and I use every single day and it is already impacted and often times a nightmare to navigate.

205-5 b) **We do not have the proper resources to handle adding hundreds of residents at Site #26**. There's no close access to hospitals & other essential needs, and adding 'very low income' housing into an area already stretched thin is not setting up anyone for success, but rather is penalizing everyone. It doesn't support the citizens of Granite Bay.

c) **There is no Public Transportation locally available to accommodate this.** How are 'very low income' residents expected to commute/find reliable transportation, and to what jobs are they commuting to? The local area does not have a surplus of jobs and the ones in this area are mostly low pay retail type jobs.

205-6 d) **How are these folks supposed to survive in this community without the ability to afford living here?** The stores in this area are not geared toward lower income residents. The only grocery store in the area is a premium grocery store and the retail stores, restaurants and more are priced and setup for higher earners. These residents will have to drive all the way down Douglas to find stores that are more suitable for their income, increasing traffic even more and leading to more stress on the services and infrastructure of the area that we are unequipped to handle.

#3 SCHOOL DISTRICT IMPACT

205-7 a) **Eureka Union School District is one of the least funded districts in the state.** Yet is one of the highest rated school districts in the state of California. This is done through annual donations, community and parental involvement, and fundraising activities through Eureka Schools Foundation. Adding hundreds of kids to that population, especially ones that cannot contribute to the annual donations that keep EUSD afloat, will significantly water down the ability of the school district to support those students at the levels that have made Eureka Union School District and Granite Bay a destination community. Without Granite Bay being a destination community, house prices will fall and with it will be tax benefits for the entire county. As tax benefits reduce for Placer County, demand for services will also increase putting Placer County into an even graver situation.

b) **EUSD schools are already impacted and cannot handle an increase of students.** The average classes are 30-35 students and the schools have nowhere to build out, not to mention the funds to do so. The district and schools are already struggling to hang on and to add additional students to the already overcrowded situation is something the district may never be able to recover from.

205-8 **#3 ENVIRONMENTALLY IRRESPONSIBLE & POTENTIALLY UNLAWFUL**

a) **Multiple protected species, including the Golden Eagle, utilize this parcel of land.** We

are also of the belief that the proper environmental studies were not conducted. CDFW has been informed of this.

205-9

b) **Linda Creek (which would be severely impacted by this project) is home to protected salmon that swim upstream to spawn.**

205-10

c) The state's VERY OWN CRITERIA specifically notes that the **housing program is not intended for larger sites in excess of 10 acres**. This isn't even close even with adding in a buffer zone around the creek.

205-11

Kally, I respectfully ask that you move to join Supervisor Jones and remove Site #26 from the list of candidate sites.
Please do the right thing by the very people you were hired to serve. We will pursue this from every angle possible, including legal action if required, to ensure that OUR community is safe.

Thank you for your time and consideration.

Sincerely,

Dan Howell
Granite Bay Resident
(408) 505-4070 direct
Best,

Dan Howell

LETTER 205: DANIEL HOWELL

Response to Comment 205-1
Please see Master Response 1 – Non-EIR/Administrative Issues

Response to Comment 205-2
Please see Master Response 6 – Impacts to Schools, as well as Response to Comment 470-2.

Response to Comment 205-3
Please see Master Response 4 – Traffic Safety, as well as Responses to Comments 370-2 and 370-3. It should also be noted that Auburn-Folsom Road is not one of the 15 segments identified for further study.

Response to Comment 205-4
Please see Master Response 4 – Traffic Safety. It should also be noted that Auburn-Folsom Road is not one of the 15 segments identified for further study. In terms of traffic, increased congestion is not a CEQA issue. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 205-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 30-2.

Response to Comment 205-6
Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2- Social and Economic Impacts, and Master Response 4 – Traffic Safety. With respect to public service concerns, please see Response to Comment 168-2.

Response to Comment 205-7
Please see Master Response 6 – Impacts to Local Schools.

Response to Comment 205-8
For concerns related to golden eagles and other wildlife in proximity to Rezone Site #26, please see Response to Comment 162-8.

Response to Comment 205-9
For concerns related to Linda Creek, please see Response to Comment 52-2.

Response to Comment 205-10
For concerns related to Linda Creek, please see Response to Comment 52-2.

Response to Comment 205-11

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 206

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element Program HE-1
Date: Tuesday, February 20, 2024 9:17:08 AM

From: Daniel Howell <danhowell13@gmail.com>
Sent: Sunday, February 11, 2024 10:44 AM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Housing Element Program HE-1

Dear Board of Supervisors and Sr Planner Kally,

I am writing to you in reference to Housing Element Program HE-1, the plan designating to rezone the property at 8989 Auburn Folsom Road from commercial use to a newly created zoning element, which establishes a maximum of 30 units per acre (510 units total).

I live in the neighborhood directly next to the location and have 3 daughters that attend and will attend Cavitt Junior High next door to the proposed housing units. Placing this type of housing to share a border with Cavitt Jr High is **incredibly dangerous to the well being of students** and faculty at Cavitt. Without a doubt, the school district safety (and educational grade) would shift dramatically in a negative way if this were allowed to move forward. This is highly irresponsible to consider for this reason alone. Every single neighbor I have spoken to is vehemently opposed to this proposed project for this and a multitude of other reasons. I would like to focus on my personal experience.

206-1

About 16 years ago, my wife and I bought a house in a neighborhood in this region that was a great place to raise a family at the time. We were pregnant with our eldest daughter at the time and we were very excited about the area we were moving to. What drove us to that area was the schools, the sense of safety, and the obvious pride the neighbors seemed to have in upkeeping the area. About 4 years into buying the house, the city made a very similar choice as to what is being proposed here. Within 3 years, the schools that had attracted us went from rankings of 9+ to 4-5. Neighborhood crime went through the roof and a number of our direct neighbors had their houses robbed. My wife and I, who felt so good about the safety of our community, were suddenly made to feel unsafe. We couldn't go to the store without feeling like we had to look over our shoulders. Where neighbors would work hard to keep the streets and parks clean, we were quickly battling graffiti, drug paraphernalia, used condoms and more. This is what sparked our move to Granite Bay in hopes of raising our daughters in a neighborhood that we could all feel safe in. Please don't take make that same mistake and that away from us.

We made the move to Granite Bay 6 years ago. We worked very hard most of our lives to be able to put our family in a position to live in a community like Granite Bay. A place that is not overcrowded. A place that is proud of its community and invests in it to improve. A place where the people value the schools, education as a whole and makes it a priority. A place that feels safe. In the short 6 years that I have been here, I have seen changes to the Granite Bay community that take it in the opposite direction. This project that is being proposed takes that to a whole other level and represents the opposite of what make Granite Bay so special and so desired. What attracts high earners, high property values, and high tax revenues. The last few years we have seen decisions from the "leaders" of this community that are ruining the idea

20a-1 cont.

of Granite Bay and this might be the most disastrous of them all. Let's be very clear. If we continue down this path, the idea and community of Granite Bay will never recover. I've seen this before. The school ratings will decline, crime will increase, high earners will leave, the property values will decline, tax revenue will decline, expenses will go up, and the destination place that Granite Bay is will cease to exist.

Do not make this colossal mistake and approve of this short-sided, disastrous plan that will have negative ramifications for generations to come. This will significantly speed up the decline of our community and will ruin the value of Granite Bay. We will not lay down. We will fight this and as a community we will remember who both allowed and made this happen. We will do so with our votes and our financial investments into the community.

Board of Supervisors and Sr Planner Kally, I ask that you strongly assist in preventing this development from moving forward, for the safety and well-being of all parties involved.

Best,

Dan Howell

LETTER 206: DANIEL HOWELL

Response to Comment 206-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 6 – Impacts to Schools, as well as Response to Comment 470-2.

Letter 207

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: General Plan Amendment & Rezoning to RM-30
Date: Monday, March 11, 2024 4:02:49 PM

From: Pat Caddy <wandercaddy@yahoo.com>
Sent: Monday, March 11, 2024 12:53 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: General Plan Amendment & Rezoning to RM-30

Kally,

207-1 I am writing to express my concern regarding the pending rezone of parcels 71 & 72 and others in this General Plan amendment. I understand the need for additional housing in the county yet I do not believe parcels 71 & 72 are a good choice for this change. I am a long time resident of the nearby area and I have serious concerns about

207-2 increased traffic in the area. We have been evacuated several times during my residence here and I feel the additional high density proposed residences would severely strain the existing roadways in emergency situations. I am also concerned about the loss of a rural feel to the area

207-3 with construction of high density housing nearby. As a Senior County Planner, I hope you will seriously evaluate the social and environmental impacts of this proposed project rezoning.

Sincerely,
Patricia Hurley
195 Russell Road
Auburn, CA 95603

LETTER 207: PATRICIA HURLEY

Response to Comment 207-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 207-2
Please see Master Response 4 – Traffic Safety and Responses to Comment Letter 174.

Response to Comment 207-3
Please see Master Response 2 – Social and Economic Impacts.

Letter 208

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: PUBLIC COMMENT ON REZONING FOR AFFORDABLE HOUSING
Date: Tuesday, March 12, 2024 4:48:19 PM

From: sue ingle <wescottsue@att.net>
Sent: Tuesday, March 12, 2024 4:44 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Sue Ingle <wescottsue@icloud.com>
Subject: PUBLIC COMMENT ON REZONING FOR AFFORDABLE HOUSING

To: Kally Kedinger, Placer County Senior Planner,

208-1

I'm submitting comment on the rezoning for high density affordable housing in Placer County. Please do not approve any developments in high fire danger locations, especially sites #71 and #72 located in Auburn at Russell Road. Evacuation routes must be considered before approving any new high-density developments.
There was already a fire in the same area on July 20, 2017, and it was chaos evacuating the area with the existing residences. This would add +/- 500 more cars(1200+ road trips per day) to roads that are not designed for a higher volume of traffic. These roads are squirrel trails and are barely 2 lanes without cars parked along the road. Fire trucks and ambulances have challenges navigating the area as is.

Placer County should not take eminent domain of any existing properties to accommodate meeting the high-density housing requirements. This includes taking property to widen roads for high-density developments.

There are better locations for high-density housing in Placer County. For instance, in 2018, Placer County approved the Sunset Area Ranch Development and an ideal location for high density housing. Most of the land has not been developed, so Placer County would not be impacting small established community neighborhoods with large dense housing

208-1 Cont.

developments. You can zone the Sunset area Ranch and meet most of your requirements. And, Sunset Area Ranch has much less fire danger than Auburn.

Again, please do not recommend high density housing in extreme and high fire danger areas. It's irresponsible.

Sincerely,
Sue Ingle
16 Wescott Court
Auburn, CA 95603
wescottsue@att.net

LETTER 208: SUE INGLE

Response to Comment 208-1

For concerns related to traffic and emergency evacuation at Rezone Sites #71 and #72, please see Responses to Comments 2-12, 2-14, 2-15, and 174-2. In addition, impacts related to wildfire and evacuation are evaluated in Chapter 10, Fire Protection and Wildfire, of the Draft EIR.

Letter 209

From: Steve
To: Kally Kedinger-Cecil; Daniel Woodward; Suzanne Jones; Placer County Environmental Coordination Services
Subject: Additional comments Regaring Site 26 for rezoning effort.
Date: Saturday, March 16, 2024 9:13:37 PM
Attachments: EIR rezone Comments site 26 4. AIR Q UALITY AND G REENHOUSE.pdf
Mobile Home Parks in Granite Bay direction adjacent to site 26.pdf
EIR 9. Tribal cultural resources Steve Eval.pdf

209-1 | Kally
Attached are additional documents regarding the EIR.
209-2 | I would also like to verify that a video of the Granite Bay MAC, in
open session, delivered comments on the rezoning on March 7, 2024 to Supervisor and Board Chair Suzanne Jones and the head of the planning department. You should have received th video and transcription since that
was delivered in an open meeting by the date required for those comments.

Thank you for your consideration.
Steve Irvine
svirvine@gmail.com
8942 Bronson Drive
Granite Bay CA, 95746

Air Quality Evaluation Comments
Trailer Parks in Granite Bay, ignored by the process Comments
(you may have received a duplicate of this one)
9. Tribal Cultural Resources Comments

4. AIR Q UALITY AND G REENHOUSE G AS E MISSIONS
Site 26(Comments and Objections to the accuracy of the EIR)
Steve Irvine, Granite Bay resident

209-3 The Draft EIR is this area is not compliant because it fails to discover, inspect and thoroughly examine the actual site specific location, circumstances, vegetation, animal life, noise, traffic congestion and impact on sensitive receptors of existing and proposed components. Should any development be proposed, it will require a site specific examination of all SEQA requirements and may not depend on this EIR in part or in hole to excuse such specific analysis.

Chapter 4 – Air Quality and Greenhouse Gas Emissions
Page 4-40
209-4 **The proposed project does not include any site-specific development plans, designs, or proposals. As a result, specific phasing, timing information, and other details regarding the extent of construction activities associated with future potential residential development of the rezone sites is not available at this time. Therefore, construction details associated with any future residential development of the rezone sites would be highly speculative, and, thus, emissions associated with such have not been modeled in this analysis. Rather, construction emissions are evaluated at a programmatic level.**

The Draft EIR States explicitly that not site specific analysis has been performed, and thus is deficient with respect to Site 26 and there fore requires a full SEQA analysis for that site to be properly rezoned. Thus any findings of "impact less than significant" have to be disregarded because insufficient facts are unknown, purely speculative, and have no value as evidence. This includes No specific study with respect to Asbestos on a site 26. Only a comment on general "areas that might contain it naturally" is identified.

Sensitive Receptors
Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, day care centers, playgrounds, and medical facilities.

CARB Air Quality and Land Use Handbook
209-5 **CARB's Air Quality and Land Use Handbook: A Community Health Perspective (CARB Handbook) addresses the importance of considering health risk issues when siting sensitive land uses, including residential development, in the vicinity of intensive air pollutant emission sources including freeways or high-traffic roads.**

The proposed high density site is located in direct proximity to the busiest road in Place County At peak periods, substantial backups of noxious dangerous fumes are produced from vehicle passing by and by vehicles stopped idling at the location. No mitigation has been suggested. This places residents of this area at risk for health issues related to these emissions. The EIR does not suggest any mitigation other than the implied directive, not to build housing near those areas.

Its an established fact that vegetation reduces some dangerous green house gases. Using site 26 will require removal of most if not all of 10 acres of heavy brush and trees, to be replaced by housing, There is no mitigation proposed for this impact. This site will become a net producer of Green house gases, in

209-5 cont. direct contradiction of the States directives to reduce Same.
Page 1

209-6 **County Policy 6.F.6 The County shall require project-level environmental review to include identification of potential air quality impacts and designation of design and other appropriate mitigation measures or offset fees to reduce impacts. The County shall dedicate staff to work with project proponents and other agencies in identifying, ensuring the implementation of, and monitoring the success of mitigation measures.**

Project in this context means a specific development proposal for site 26, which we do not find in the current EIR. We expect the Planning commission to require such plans for this site if any development proposal comes forth.

209-7 **County Policy 6.G.1 The County shall require new development to be planned to result in smooth flowing traffic conditions for major roadways. This includes traffic signals and traffic signal coordination, parallel roadways, and intra- and inter-neighborhood connections where significant reductions in overall emissions can be achieved.**

Again, we see not specific details in the EIR with respect to Site 26. Only a general discussion of "average volume traffic increase" which ignores the problem of Peak Volume traffic congestion and resulting emissions. Once again, this EIR is deficient in this area, making the EIR non-compliant with the rezoning effort.

209-8 **County Policy 6.G.6 The County shall require large new developments to dedicate land for and construct appropriate improvements for park-and-ride lots, if suitably located**

There is no specific recommendation that this site set aside park and ride facilities, thus the planning commission should designate acreage and access for every site that is going to have additional housing.

209-9 **Chapter 4 – Air Quality and Greenhouse Gas Emissions**
Page 4-32
Granite Bay Community Plan
The following goals and policies related to air quality are from the Granite Bay Community Plan:
Natural Resources Element

> **Goal 5.15.2 Integrate land use, transportation, and air quality planning to make the most efficient use of public resources and to create a healthier and more livable environment for the Granite Bay area.**
> **Goal 5.15.3 Reduce emission impacts to "sensitive receptors" (children, the elderly, persons afflicted with health issues) living in the Granite Bay Community Plan area.**

Placing high density housing next to the busiest road in Placer County, the major thorough fair for a multi-county, multi-city connection high density traffic corridor is inconsistent and illogical under any view.

Page 2

Benefits of trees (USDA Website)

Trees Are Climate Change, Carbon Storage Heroes

Trees work for us. Properly cared for, they are valuable assets worth three times your initial investment. Healthy trees mean:

- Healthy people: 100 trees remove 53 tons of carbon dioxide and 430 pounds of other air pollutants per year. '
- Healthy communities: Tree-filled neighborhoods lower levels of domestic violence and are safer and more sociable.
- Healthy environment: One hundred mature trees catch about 139,000 gallons of rainwater per year.
- Homeowner savings: Strategically placed trees save up to 56 percent on annual air-conditioning costs. Evergreens that block winter winds can save 3 percent on heating.
- Better business: Consumers shop more frequently and longer in tree-lined commercial areas and are willing to spend more.
-

209-10

These Trees are at least 30 years old, which means they store 1500+ tons of Carbon Dioxide. When the are removed to allow the highly dense housing recommended by the County, all of that stored Green house gas will be released back into the atmosphere, because the main use of cut down oak trees is firewood.

The EIR is completely silent on this impact to the environment for site 26, hence there is no mitigation suggested and thus is deficient, not only on site 26, but on all sites collectively.

Page 3

209-11 This attachment covers the trailer parks that EIR seems to have conveniently not counted when do its "affluence check".

Regaring Page F-44 of
HOUSING ELEMENT AMENDMENT
APPENDIX F, March 2024

209-12 *"Of the thirteen census tracts that include rezone sites, five have median household incomes higher than the 2023 countywide area median income of $113,900, including tracts in the Granite Bay area and areas to the southwest of Roseville. These sites represent 37.1 percent of the capacity that will be created by the rezone."*

Lets be clear: 37.1% is coming from primarily one site in Granite bay, Site 26. Let the Trailer parks speak to the affluence of that area:

Granite Bay Mobile Home Park
46-50 Mobile Homes, Mix of older single wide trailers, some double wide trailers
8880 Auburn Folsom Rd, Granite Bay, CA 95746
These are probalby not affluent owners as described by the EIR
Directly across from site 26

20-12 cont.



Mobile home park is directly across from Site 26 (aerial View)

209-12 cont.



Inside view, Granite Bay Mobile Home Park

Ridgeview Mobile Home Park (55+)
60 or so mobile homes. Mix of older single wide trailers, some double wide trailers
9060 Auburn Folsom Rd, Granite Bay, CA 95746
stones throw from lot 26
These are probably not affluent owners as described by the EIR

209-12 Cont.



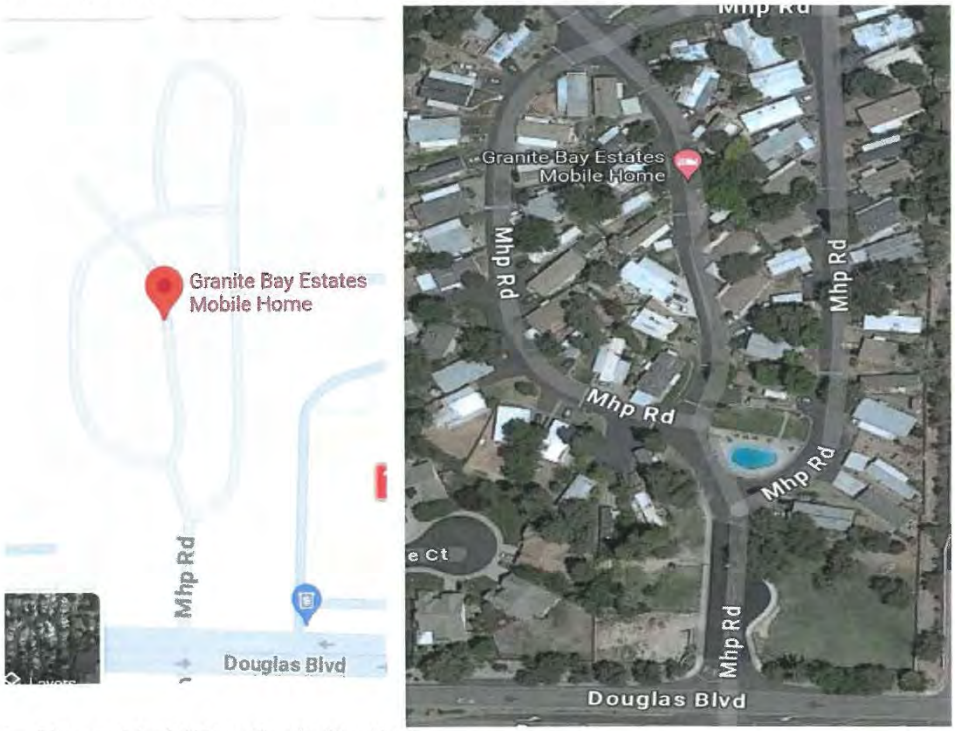
Aerial view of Ridgeview Mobile Home Park



Entrance View of Ridgeview Mobile Home park

Granite Bay Estates Manufactured Home "Community"
605 Douglas Blvd, behind Raleys at the corner of Douglas Blvd and Auburn Folsom Rd.
less than ½ mile to site 26
about 100 mobile homes/manufactured homes
These are probably not affluent owners as described by the EIR

209-12 cont.



Map View and Aerial View Granite Bay Estates

Granite Bay Village
Directly Across from Site 26, on Fuller Drive, within 300 feet



20-12 cont.

56 single family, maximum density Homes about 25-30 years old. No street parking, 10 total "extra spaces" for 56 homes. Site 26 Directly abuts Site 26.



209-13

Cavitt Jr High School, Directly Abuts Site 26



Traffic ON Fuller Drive is bumper to bumper at start and and of school day. Parking on Fuller and the Jr High overflow on summer weekends and holidays. Currently a guard is employed after hours to prevent vandalism.

9. Tribal Cultural Resources

Table 9-2
Rezone Sites Identified by the NCIC of the CHRIS Records Search with Precontact Resources

Rezone Site #	APN	Address	Location(s)
21	043-072-018-000	Penryn Road	Off-site
22	043-072-019-000	Penryn Road	Off-site
24	048-132-071-000	Eureka & Auburn-Folsom	Off-site
25	048-132-073-000	8950 Auburn Folsom Road	Off-site
26	047-150-053-000	8989 Auburn Folsom Road	Off-site
27	047-150-015-000	7130-7160 Douglas Boulevard	Off-site
28	047-150-016-000	7130-7160 Douglas Boulevard	Off-site
45	095-050-042-000	235 Alpine Meadows Road	Off-site
56	052-042-015-000	Plaza Way	Off-site
57	052-042-016-000	Plaza Way	Off-site
68	080-020-013-000	10715 Highway 89	Off-site
69	080-020-014-000	10715 River Road	Off-site

On-site = within the parcel / Off-site = within 0.25-mile of the parcel

Source: Historic Resource Associates, 2023.

209-14

Site 26 is near enough to No Precontact resources to justify a complete study of this site. This site is the largest planed super-dense residential site of the entire EIR study, as a result deserves legally and morally the complete field study in all areas of the EIR. The fact that no tribe requested this site be removed only speaks to the fact that it was never really on their radar and is not an excuse to ignore possible impacts. Failing to speak up does not mean there is no issue.
(Also refer to section 6.)

Section 106 for the National Historical Preservation Act of 1966
Federal regulations for cultural resources are governed primarily by Section 106 of the National Historical Preservation Act (NHPA) of 1966. Section 106 of NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, "Protection of Historic Properties," are found in 36 Code of Draft EIR

Federal Regulations (CFR) Part 800. The goal of the Section 106 review process is to offer a measure of protection to sites, which are determined eligible for listing on the National Register of Historic Places (NRHP). The criteria for determining NRHP eligibility are found in 36 CFR Part 60. Amendments to the Act (1986 and 1992) and subsequent revisions to the implementing regulations have, among other things, strengthened the provisions for Native American consultation and participation in the Section 106 review process. While federal agencies must follow federal regulations, most projects by private developers and landowners do not require this level of compliance. ***Federal regulations only come into play in the private sector if a project requires a federal permit or uses federal funding.***

Since it was stated in the EIR that federal grants and funding would be sought in building some of these properties, the federal law applies to site 26 and requires much more detailed analysis under

federal law

Public Resources Code Section 5024.1(c)
According to PRC Section 5024.1(c), a resource may be listed as an historical resource in the California Register if the resource meets any of the following NRHP criteria:
(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
(2) Is associated with the lives of persons important in our past.
(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
(4) Has yielded, or may be likely to yield, information important in prehistory or history.

Until a proper study has been accomplished, no one can determine if there will be an impact.

Placer County Policy 5.D.7 The County shall require that discretionary development projects are designed to avoid potential impacts to significant paleontological or cultural resources whenever possible. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. Determinations of impacts, significance, and mitigation shall be made by qualified archaeological (in consultation with recognized local Native American groups), historical, or paleontological consultants, depending on the type of resource in question.

209-14 cont.

No one knows if there is an impact because no study has been completed.

Method of Analysis
The impact analysis contained in this chapter is primarily based on a SLF search conducted by the NAHC, project notification and offer to consult letters sent by the County to Native American individuals and organizations, and follow-up Native American consultation pursuant to AB 52 and SB 18, as well as an Archaeological and Historical Resources Assessment prepared by Historic Resource Associates for the project site. The methods of analysis are described in detail below.

Again, without analysis, how can one make a determination?

Literature and Map Review
Historic Resource Associates searched land patent records maintained by the Bureau of Land Management and reviewed maps and aerial photographs that were not available at the NCIC. Specifically, the maps reviewed by Historic Resource Associates include the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangles from the following areas: Auburn; Citrus Heights; Colfax; Lincoln; Rocklin; Roseville; Truckee; and Tahoe City

No such review was performed in Granite Bay on any property, nor site 26.

Windshield Survey Methods
Historic Resource Associates conducted windshield surveys of the 12 rezone sites identified as having a high potential to contain archaeological resources. The windshield surveys consisted of examining the rezone sites from public spaces to determine the degree of impact since the original recording of a cultural resource was completed. The 12 rezone sites that underwent windshield surveys are presented in Table 9-3 below.

Not even a windshield survey was conducted on site 26. We consider the entire process of a windshield study to be grossly negligent on the part of the EIR authors. It defies logic to state you can evaluate anything at that level

209-14 cont.

as Insufficient analysis and survey studies have not been accomplished, we find that less than significant findings are insufficiently documented.

Similar to the proposed project, for other future development projects, Placer County would be required to consult with tribes culturally and traditionally affiliated with the project area, and if determined necessary, to implement project-specific mitigation to ensure any potential impacts to identified tribal cultural resources are reduced to a less-than-significant level, where possible. Therefore, given that tribal cultural resource impacts are generally site-specific and each future project within Placer County would be required to mitigate such impacts, any potential impacts associated with cumulative build out of the Placer County area would not combine to result in a significant cumulative impact.

Once again the EIR says that specific projects will be required, yet having no knowledge of the possible impacts due to lack of study, they say there is no impact?

LETTER 209: STEVE IRVINE

Response to Comment 209-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 209-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 209-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. In addition, potential impacts associated with the proposed project related to biological resources, noise, and transportation are discussed in Chapters 5, 7, and 8, respectively, of the Draft EIR.

Response to Comment 209-4
Please see Responses to Comments 199-2 and 200-4.

Response to Comment 209-5
The commenter's statement that Rezone Site #26 is located in direct proximity to "the busiest road in Placer County," is an erroneous and unsubstantiated assumption. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." In addition, impacts of the environment on a project (as opposed to impacts of a project on the environment) are beyond the scope of required CEQA review.[1]

Nonetheless, the potential health effects of criteria pollutants is programmatically discussed under Impact 4-4 of the Draft EIR, which begins on page 4-53. The Draft EIR also includes an evaluation of health risks related to toxic air contaminants (TACs) in the Air Quality and Greenhouse Gas Emissions chapter, starting on page 4-50. As detailed therein, major sources of TACs include freeways and high traffic roads, distribution centers, and rail yards. Such land uses or operations that would be considered major sources of TACs, including DPM, would not be allowed within the proposed RM30 zoning district. As such, the proposed project would not result in the generation of any substantial pollutant concentrations during the operation of any future potential development within the rezone sites. Moreover, the Draft EIR includes an analysis of localized carbon monoxide (CO) emissions. As stated on page 4-50 of the Draft EIR, according to modeling performed for Rezone Site #26, which, as shown in Table 3-2 of this EIR, is the largest rezone site, maximum buildout of the site at 30 units per acre would result in maximum unmitigated mobile

[1] "[T]he purpose of an EIR is to identify the significant effects of a project on the environment, not the significant effects of the environment on the project." (*Ballona Wetlands Land Trust v. Town of Los Angeles,* (2011) 201 Cal.App.4th 455, 473 (Ballona).) The California Supreme Court recently held that "CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. What CEQA does mandate… is an analysis of how a project might exacerbate existing environmental hazards." (*California Building Industry Assn. v. Bay Area Air Quality Management Dist*. (2015) 62 Cal.4th 369, 392; see also *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 197 ["identifying the effects on the project and its users of locating the project in a particular environmental setting is neither consistent with CEQA's legislative purpose nor required by the CEQA statutes"], quoting *Ballona, supra*, 201 Cal.App.4th at p. 474.).

source CO emissions of 131 lbs/day (see Appendix F of the Draft EIR), which would be substantially below the 550 lbs/day screening threshold used by PCAPCD.

It should further be noted that Mitigation Measure 4-2(a) would help to reduce operational criteria pollutant emissions that would occur from future potential development of the rezone sites to the maximum extent feasible by requiring site-specific development proposals to implement all mitigation measures as determined feasible for mobile and area source emissions identified in the Placer County Air Pollution Control District's (PCAPCD) CEQA Air Quality Handbook, the Placer County Sustainability Plan: A Greenhouse Gas Emission Reduction Plan and Adaptation Strategy (PCSP), the California Green Building Standards Code, Actions A4.203.1.2.1 and A5.203.1.2.1 of the CalGreen standards, and/or other just as effective options as they become available.

With regard to GHG emissions, as discussed on page 4-56, the PCAPCD has developed operational screening criteria to aid in determining if GHG emissions from development projects would exceed the PCAPCD thresholds of significance. The operational GHG screening criteria provides a conservative indication of whether a development project could result in potentially significant impacts. According to PCPACD, if a project is below the screening level identified for the applicable land use type, GHG emissions from operation of the project would be below the Screening-Level Threshold and, thus, would result in a less-than-significant impact related to GHG emissions. The screening criterion for operational GHG emissions associated with apartment uses is 115 dwelling units.[2] Assuming the rezone sites would be developed at 30 units per acre, development of any rezone site larger than 3.83 acres would exceed the PCAPCD operational GHG screening criteria. Rezone Site #26 is larger than 3.83 acres. Therefore, based on the PCAPCD's screening criteria, and as required by Mitigation Measure 4-5(b) of the Draft EIR, prior to improvement plan approval for any future development proposals with more than 115 multi-family units, the project applicant would be required to retain a qualified air quality consultant to conduct an analysis to quantify the project's operational GHG emissions and compare the emissions to the applicable PCAPCD thresholds of significance. If emissions are determined to exceed the applicable thresholds of significance, the qualified air quality consultant would be required to identify measures to reduce the project's operational GHG emissions to below the PCAPCD's recommended thresholds of significance.

Response to Comment 209-6

Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR. The commenter is correct in that a project-specific development plan has not been prepared for Rezone Site #26. As such, a programmatic analysis of the proposed project's potential air quality impacts was conducted in the Draft EIR. As discussed in Chapter 4, Air Quality and GHG Emissions, of the Draft EIR, implementation of Mitigation Measures 4-1 through 4-3, 4-5(a), and 4-5(b) would be required to help reduce air quality and GHG emissions that could occur from future potential development of rezone sites.

[2] Placer County Air Pollution Control District. *CEQA Air Quality Handbook* [pg. 25]. November 21, 2017.

Response to Comment 209-7

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

In addition, with regard to emissions associated with traffic congestion, the Draft EIR includes an analysis of localized CO emissions. Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. High levels of localized CO concentrations are only expected where background levels are high, and traffic volumes and congestion levels are high. As stated on page 4-50 of the Draft EIR, according to modeling performed for Rezone Site #26, which, as shown in Table 3-2 of this EIR, is the largest rezone site, maximum buildout of the site at 30 units per acre would result in maximum unmitigated mobile source CO emissions of 131 lbs/day (see Appendix F of the Draft EIR), which would be substantially below the 550 lbs/day screening threshold used by PCAPCD.

Response to Comment 209-8

Please see Master Response 1 – Non-EIR/Administrative Issues. There is no requirement that any future residential development on Rezone Site #26 include park and ride facilities.

Response to Comment 209-9

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, and Response to Comment 209-5.

Response to Comment 209-10

Future multi-family residences on the rezone sites would be subject to review for conformity with the Multifamily and Mixed Use Design Manual adopted by the Board in June 2021. The development standards for multifamily development are outlined in Section 2.3, Multifamily Development, of County's Multifamily and Mixed Use Design Manual. In addition, Section 3.4, Landscaping and Drainage, of the County's Multifamily and Mixed Use Design Manual, outlines the landscaping requirements and policies for multi-family residences. Specifically, as discussed therein, a minimum of 25 percent of each rezone site would be required to be landscaped. In addition, on-site trees would be required to be planted throughout each rezone site, including one shade tree for each five parking spaces, as well as screening trees along the perimeter of the sites, planted at a maximum interval of 15 feet. All trees would be required to be a minimum of 15 gallons in size, and at least 10 percent of the required trees would be required to be 24-inch box size or larger.

While the exact number of trees or total amount of landscape area proposed for the rezone sites is not known at this time, all landscaping improvements would be required to be consistent with the aforementioned standards. Therefore, the provision of on-site trees and landscaping within the rezone sites would ensure continued carbon sequestration following development of the proposed project.

Response to Comment 209-11

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 209-12

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 209-13

Please see Master Response 4 – Traffic Safety and Master Response 6 – Impacts to Local Schools, as well as Response to Comment 470-2.

Response to Comment 209-14

Potential impacts associated with the proposed project related to cultural resources are discussed in Chapter 6, Cultural Resources, of the Draft EIR. As discussed therein, an Archaeological and Historical Resources Assessment was prepared for the rezone sites, which included a records search by staff at the NCIC at California State University, Sacramento, cultural resources literature searches, and archival research of the 72 rezone sites. In addition, windshield surveys were conducted at 12 of the 72 rezone sites.

Furthermore, as stated on page 6-23 of Chapter 6, Cultural Resources, of the Draft EIR:

> Pursuant to the Archaeological and Historical Resources Assessment, and as summarized by Table 6-1, precontact and/or historic archaeological sites are located within or in close proximity to 23 of the 72 rezone sites. The identified precontact and/or historic archaeological rezone sites are as follows: Rezone Sites #13, #17, #21, #22, #24 through #29, #35 through #37, #41, #44, #45, #51 through #53, #56, #57, #68, and #69.

Thus, the Draft EIR acknowledges the presence of precontact sites within close proximity to Site 26. Implementation of Mitigation Measures 6-2(a) through 6-2(c) would reduce any potential significant impacts to archaeological resources to a less-than-significant level. For example, Mitigation Measure 6-2(a) requires a qualified archaeologist to conduct a short awareness training session for all construction workers and supervisory personnel prior to ground-disturbing activities at any of the 23 rezone sites, which have been identified as having precontact and/or historic archaeological resources. The training shall identify the steps that must be followed in the event that resources are found on-site.

Furthermore, as discussed in Chapter 9, Tribal Cultural Resources, of the Draft EIR, pursuant to AB 52 and SB 18, Placer County sent invitations to consult to tribes who requested notification of proposed projects within the County on October 17, 2023. On December 4, 2023 the UAIC tribal historic preservation department requested to consult on the proposed project due to the cultural sensitivity of the area. The County subsequently initiated consultation with the UAIC. As a result of the consultation, Sites #32 and #33 were removed from the potential rezone site list at the request of the UAIC. Both sites had high sensitivity for precontact and historic cultural resources. The UAIC also expressed concerns about future residential development being constructed on Rezone Sites #9, #10, #19, #20, #27, and #28, even though the sites have undergone previous disturbance due to development. As a result, the County has required post-disturbance mitigation measures for these six sites (#9, #10, #19, #20, #27, and #28) in this chapter. The County did not receive responses from the other aforementioned tribes in response to the AB 52 or SB 18 notification letters. AB 52 consultation between the County and the UAIC was closed on December 19, 2023.

Letter 210

From: Steve
To: Suzanne Jones; Shanti Landon
Cc: Kally Kedinger-Cecil; Supervisor Gore; Jim Holmes; Cindy Gustafson; Placer County Environmental Coordination Services; Daniel Woodward
Subject: Rezoning Effort, Additional Comments and Objections, Site 26
Date: Saturday, March 16, 2024 8:50:40 PM
Attachments: Mobile Home Parks in Granite Bay direction adjacent to site 26.pdf

Dear Supervisor and Board Chair, Suzanne Jones,
Supervisor Shanti Landon
Supervisor Jim Holmes
Supervisor Cindy Gustafson
Supervisor Bonnie Gore
Placer Planning Department
Senior PlannerKally Kedinger-Cecil
Planning Commissioner, District 4 Daniel Woodward

210-1

Please Have Site 26 Removed from the Rezone process. The impact of 300 Plus units breaks the contract the city has with the county regarding zoning as the current zoning for all of Granite Bay is 10 units per acre maximum. That is also the guidance for rezoning of rural areas.

This attached document Illustrates the actual composure near and abutting site 26. There are 200 Mobile Home sites, who will be impacted directly by a 300 plus unit complex. I will be sending additional documents to the EIR comment site.

This specific document illustrates the fact that the EIR, and Rezoning process has ignored the fact that close to 200 units of low income housing (Mobile homes) have been ignored by the process and will be directly impacted by a large unit complex that is being zoned for site 26. Please accept these comments and formal input to your decision making and the planning departments effort to drastically change the make up of this area of Placer County.

Thank you for your consideration.

ISteve Irvine
8942 Bronson Drive
Granite Bay, CA 95746
svirvine@gmaillcom

From: Steve Irvine
8942 Bronson Drive
Granite Bay, CA 95746

Kally Kedinger-Cecil
Senior Planner, Placer County
Copy: Supervisor Suzanne Jones
District 4 Supervisor, County of Placer
175 Fulweiler Avenue
Auburn, CA 95603

RE: Opposition to High-Density Residential Rezoning of property near Cavitt Junior High School
8989 Auburn Folsom Blvd

Kally;

I am writing to express my strong opposition to the proposed high-density residential rezoning in our rural community. As a proud resident of Granite Bay of 30 years, I have deep concerns about the potential adverse impacts this rezoning could have on our unique and delicate environment.

210-2

Further it breaks the contract that County has had with the Granite Bay Community, by unilaterally tripling the density in a major area of the community. In addition, this is being done without consideration to the seven areas California that are required for mutual consideration in a General Plan. The Drive by approach to the EIR that intends to support this drastic density change does not begin to address the necessary issues involved in a comprehensive General Plan and giving the residents only 7 days to reach to a couple of hundreds pages of document is inadequate.

Next, the Board of Supervisors, in a public hearing on 13 February turned down the staff request to approve the EIR document and directed the staff to look at other high quality sites. I see no evidence in any documentation that this was done. So, why is the county not considering better areas that it owns?

Chief point complaints as to why site 26 is the absolute worst place to triple the density for the current site.

1. Traffic Congestion

I want to draw attention to the anticipated increase in traffic that would accompany high-density residential development. Our rural roads are not designed to handle a significant surge in traffic, and the safety and tranquility of our community would undoubtedly be compromised. Traffic is already heavy on Douglas Blvd and Auburn Folsom Blvd. Additionally, the increased congestion would pose potential hazards for pedestrians, cyclists, and wildlife that inhabit the area.

210-3

While the EIR that you are depending on to select this site says there is only a "potential slight increase in traffic". The EIR depends on "average traffic volume", because the authors know that a study of peak volumes would drive the traffic on one of the busiest roads in Placer County to a breaking point. Further, it makes no mention of the only road to access Cavitt Jr High School, Fuller Drive which is already at peak capacity. Adding any traffic on the road will drive it beyond capacity during Peak Traffic hours. The EIR has done no actual road studies, again it relied on questionable 'high level estimates" of average traffic volume.

2. Impact on Infrastructure

High-density residential developments often place a significant burden on existing infrastructure, including roads, public transportation, and utilities. Our current infrastructure is not equipped to handle the increased demand, leading to congestion, strain on public services, and a decline in overall quality of life. I personally contacted the local water Agency whose engineer advised me that as of the February 13 meeting, they had not been advise of any potential high density project on that site. The EIR only states that there is a 10 inch water line "in the areas".

210-4

3. Loss of Green Spaces/Salmon Habitat

Our community is characterized by its open spaces, parks, and green areas that contribute to a healthy and balanced living environment. High-density development may result in the loss of these vital green spaces, negatively affecting the physical and mental well-being of residents. One of the most critical concerns is the impact on Linda Creek, which runs through the heart of our community and serves as a vital salmon habitat. The proposed rezoning could lead to habitat destruction and water pollution, jeopardizing the delicate balance of our local ecosystem. Preserving the health of Linda Creek is not only essential for the well-being of the salmon but also for the overall environmental sustainability of our community.

210-5

Additionally, if you take the time to walk the area, or at least drive by it, you will see that building anything on that site will require the removal of several dozens of Oak Trees; this is actually a 17 acre nature preserve, not a building site. It demands sensitive planning, not shot gun planing.

4. Granite Bay's Rural Low Density Charm

Furthermore, our rural community's charm lies in its natural beauty and unspoiled landscapes. The introduction of high-density residential structures would disrupt the rural character that defines Granite Bay. The unique low density rural character of our community is one of its defining features. High-density developments often introduce generic and uniform structures that do not align with the character of Granite Bay, diminishing its visual appeal and sense of identity. This would not only diminish the aesthetic appeal of our community but would also lead to a decline in property values for existing residents.

210-6

I urge the City Planning Department to consider alternative solutions that promote responsible development and environmental stewardship. It is crucial that any decisions made take into account the unique ecological characteristics of our rural community and prioritize the protection of Linda Creek and its surrounding habitats

210-7

At the Hearing held on February 13, the Board of supervisors directed the planning staff to consider additional County owned properties and at least one privately volunteered 100 acres site that were far more fitting. What study has county planning done in that area?

210-8

Engaging the community in an open dialogue about the proposed rezoning would ensure that the concerns and values of local residents are thoroughly considered. I appreciate your attention to this matter and trust that the City Planning Department will act in the best interest of our rural community's long-term sustainability.

Thank you for your time and consideration.

Sincerely,

Steve Irvine
Signed Electronically

LETTER 210: STEVE IRVINE

Response to Comment 210-1

The commenter does not identify specific environmental impacts, but rather generally comments that the EIR ignores the fact that close to 200 units of low-income housing (mobile homes) will be "directly impacted" by a large unit complex that is being zoned for Rezone Site #26. As discussed in Master Response 1 – Non-EIR/Administrative Issues, without further specificity, it is not possible to offer a detailed response, nor is it required. Nevertheless, it is noted that the mobile home site is on the other site of Auburn Folsom Road; thus, the mobile home site is already exposed to relatively high traffic noise levels, and the potential future residential development on Rezone Site #26 would not substantially increase traffic noise along Auburn Folsom Road, as demonstrated in Chapter 7, Noise, of the Draft EIR. As discussed on page 7-18, Saxelby Acoustics reviewed roadway volumes provided within the TIA for a total of 140 roadway segments and determined that only 15 could be subject to traffic volume increases of greater than 30 percent. Daily traffic increases of 30 percent would result in a maximum noise level increase of 1.2 dBA, an imperceptible change and below the strictest FICON standard (1.5 dBA) for determining impact significance. Therefore, the Noise Assessment focuses on roadway segments where traffic is predicted to increase by 30 percent, or more.

It should also be noted that Auburn Folsom Road is not one of the 15 segments identified for further study. In terms of traffic, increased congestion is not a CEQA issue. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Please also see Master Response 4 – Traffic Safety.

Response to Comment 210-2

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Response to Comment 210-3

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 210-4

As discussed in Chapter 11, Statutorily Required Sections, of the Draft EIR, and detailed further in Section XIV, Population and Housing, of the Initial Study (attached as Appendix A of the Draft

EIR), the proposed project would not require major upgrades to, or the significant extension of, existing water supply, electricity, telecommunications, or natural gas infrastructure. Compliance with all State and local regulations would ensure impacts to service levels, facility capacity, and infrastructure demand are further reduced, including increased generation of wastewater.

As discussed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project, San Juan Water District, which receives wholesale water from the Placer County Water Agency (PCWA), would provide water to Rezone Site #26. As discussed therein, according to the PCWA's 2020 UWMP, sufficient water supplies are available to serve reasonably foreseeable future development at the rezone sites, including Rezone Site #26. With respect to sewer services, buildout of the rezone sites may result in the need for upgrades to existing sewer infrastructure depending on the size and location of future development. However, pursuant to General Plan Policy 4.D.3, the project applicant of each future residential development project on the rezone sites would be required to provide written certification from the sewer service provider that either existing services are available or needed improvements would be made prior to occupancy of the development. Compliance with General Plan Policy 4.D.3 would ensure that adequate capacity would be available to serve the projected demand generated by the future residential development of each rezone site, in addition to the County's existing commitments. Therefore, the impacts related to increased demand on utilities structure were concluded to be less-than-significant. As a result, impacts related to such were adequately addressed in the Draft EIR.

As discussed under Section XV-2 in the Initial Study prepared for the proposed project, increased property taxes associated with future residential development on rezone sites would contribute to County Public Safety funding, which can be used to offset increased demands placed on the Placer County Sheriff's Office (PCSO) as a result of increased population. In addition, as discussed in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, Rezone Site #26 is located within the jurisdiction of the South Placer Fire Protection District (FPD). Rezone Site #26 is located less than 500 feet from the South Placer FPD headquarters, located at 6900 Eureka Road, Granite Bay. In addition, as discussed under Impact 10-1, as part of preparing the Draft EIR, South Placer FPD personnel were consulted and confirmed that given payment of the applicable Fire Facilities Fees, the future residential development within Rezone Site #26 would be adequately served by the relevant fire protection district.

With respect to nearby water infrastructure, the Site Inventory Form for Rezone Site #26 (see Appendix C to the Draft EIR), indicates that there is an 18-inch water line in Eureka Road. Any connections to the existing water line would be completed within existing disturbed rights-of-way and thus would not result in significant impacts to the physical environment.

Response to Comment 210-5

For concerns related to Linda Creek, please see Response to Comment 52-2.

Potential impacts related to oak woodlands are evaluated under Impact 5-6. As discussed therein, project impacts occurring through development of rezone sites covered under the PCCP, such as Rezone Site #26, would require payment of land cover conversion fees to the PCA. In addition, Mitigation Measure 5-6(d) requires future applicants to implement PCCP Community Condition 3 if Valley oak woodland occur within or adjacent to a rezone site covered under the PCCP, such as Rezone Site #26.

Response to Comment 210-6

Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 210-7

Please see Response to Comment 210-5, Master Response 2 – Social and Economic Impacts.

Response to Comment 210-8

Please see Master Response 3 – County-Owned Sites.

Letter 211

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezone Planning
Date: Tuesday, March 5, 2024 9:16:37 AM
Attachments: Opposition to Site 26 High Density Rezoning.pdf

From: Steve <svirvine@gmail.com>
Sent: Tuesday, March 5, 2024 12:53 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Suzanne Jones <SuzanneJones@placer.ca.gov>
Subject: Rezone Planning

1. I was not notified of this recent 7 day to respond for comments on the rezoning. I am on the list for notification with the county. Please look into why I was not notified and had to find out only recently with very little time to respond.

2. California State law requires every city and county to adopt a General Plan that contains these seven elements: land use, circulation, **housing**, conservation, safety, open space, and noise. Attempting to isolate one element of the plan without acknowledging the interaction with all of the elements is not only bad planning, it breaks the contract between the County and the citizens.

211-1

3. Therefore, you are failing in your fudiciary responsibilty to do a thorough job of planning and invovling the citizens more intimately in the process.

Attached is my letter in furtherence of my objects to the "housing element" which will break our contract by tripling the density in the Granite Bay Community plan, having never held a hearing about the rezoning densities.

Steve Irvine
encl: letter

LETTER 211: STEVE IRVINE

Response to Comment 211-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 212

From: Kally Kedinger-Cecil
To: Bryan; Bonnie Gore; Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Frank Udvarhely; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Subject: RE: Property #26
Date: Tuesday, March 19, 2024 8:36:27 AM
Attachments: image001.png

Hello,

Thank you for your comments. They will be incorporated into the project record. Additional information on the program is available here: Housing needs rezone program | Placer County, CA

Regards,

Kally Kedinger-Cecil
Senior Planner
Placer County Planning Services Division
kkedinge@placer.ca.gov
530-745-3034

From: Bryan <brjacks3@gmail.com>
Sent: Friday, March 15, 2024 10:22 AM
To: Bonnie Gore <BonnieGore@placer.ca.gov>; Shanti Landon <SLandon@placer.ca.gov>; Jim Holmes <JHolmes@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Frank Udvarhely <fudvarhely@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>
Subject: Property #26

Dear Board Members and others,

212-1 As a resident of Placer County, located adjacent to Cavitt Junior High School, I urge you to vote no on the development of Property #26 for high density housing. I understand the need for such housing but the location of this proposed site is not ideal. A community with this large number of residents will put a strain on community services, which are already lacking, and create issues for the few amenities already offered to this area. I wish you would consider locations that are closer to Highway 50 or I-80, which would also allow for better access to public transportation.

212-2 I have come to understand that a proper EIR has not been completed. I don't understand the reasoning for this considering its location (alterations to natural habitat, increased traffic, proximity to public school). This should not be overlooked

212-2 cont.

considering the scale of this development.

Sincerely,
Bryan Jackson

LETTER 212: BRYAN JACKSON

Response to Comment 212-1

Please see Master Response 1 – Non-EIR/Administrative Issues. With respect to public services concerns, please see Response to Comment 168-2.

Response to Comment 212-2

Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 213

From: Bryan
To: Bonnie Gore; Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Kally Kedinger-Cecil; Frank Udvarhely; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Subject: Property #26
Date: Friday, March 15, 2024 10:21:49 AM

Dear Board Members and others,

213-1 As a resident of Placer County, located adjacent to Cavitt Junior High School, I urge you to vote no on the development of Property #26 for high density housing. I understand the need for such housing but the location of this proposed site is not ideal. A community with this large number of residents will put a strain on community services, which are already lacking, and create issues for the few amenities already offered to this area. I wish you would consider locations that are closer to Highway 50 or I-80, which would also allow for better access to public transportation.

I have come to understand that a proper EIR has not been completed. I don't understand the reasoning for this considering its location (alterations to natural habitat, increased traffic, proximity to public school). This should not be overlooked considering the scale of this development.

Sincerely,
Bryan Jackson

LETTER 213: BRYAN JACKSON

Response to Comment 213-1

Please see Responses to Comments 212-1 and 212-2.

Letter 214

From: Dana Jacques
To: Placer County Environmental Coordination Services
Subject: Rezoning of property close to me.
Date: Sunday, March 17, 2024 8:06:07 PM

214-1

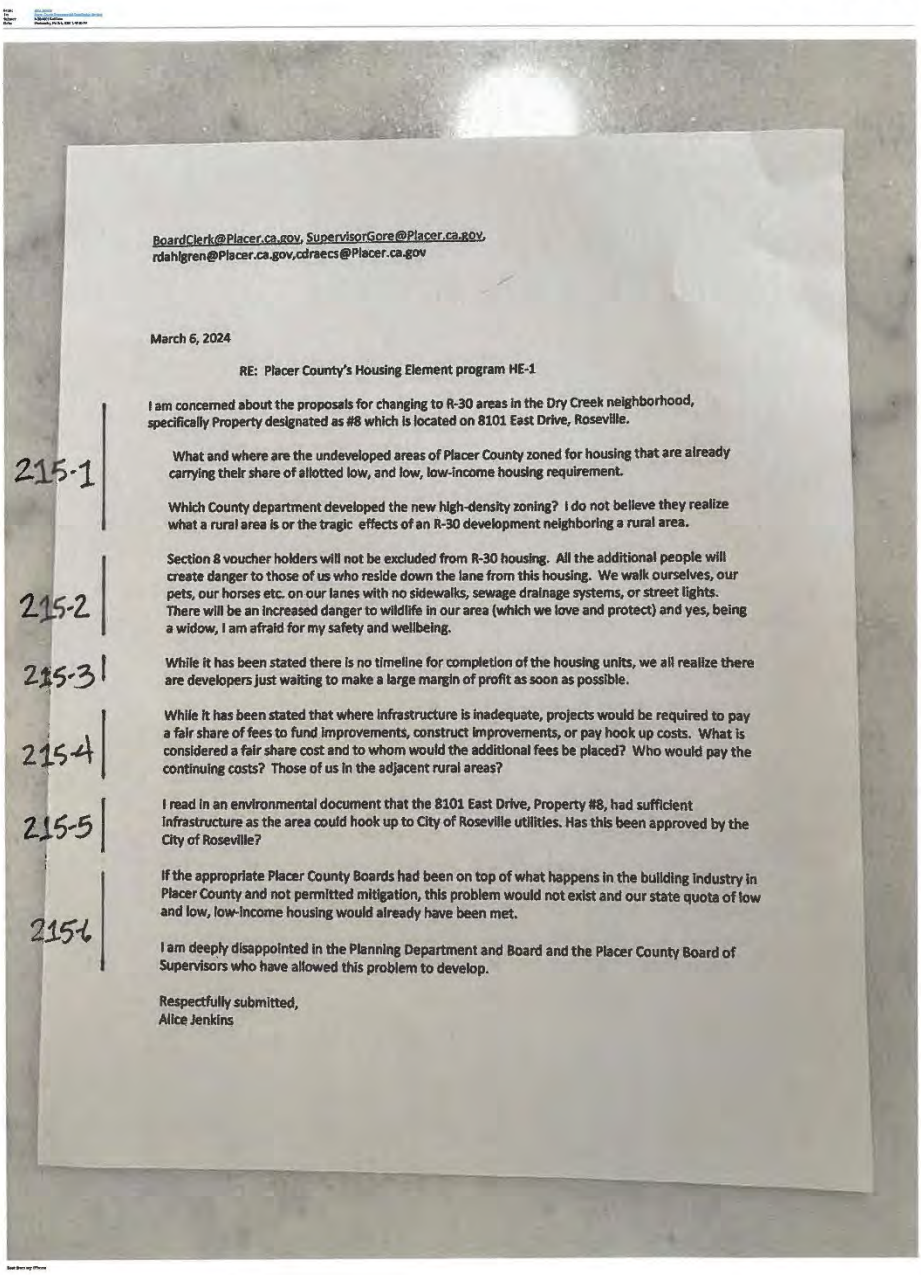
Hi! I am a homeowner at 9019 Cairn Street in Granite Bay at the Carnelian at Granite Bay homes located on Eureka and Auburn Folsom Boulevard. I am strongly opposed to the rezoning of the property that is close to my home, due to the fact that we already have extremely tight traffic conditions in this area, not to mention nearby schools that cause a significant amount of traffic during the school year. I am concerned that locating so many homes close to this intersection would result in an overwhelming amount of traffic and congestion. This would also pose a This would also pose a safety hazard for the students that are attempting to get to school via walking or biking, and also those trying to get to bus stops that are along Eureka Road. Unfortunately, there is really no option to widen the roads in this area because there is the state park right across the street. this has also been a discussion topic for my neighbors in this community and we are all opposed to this change. We would definitely appreciate reconsideration of this proposal. Sincerely, Dana Jacques.
Sent from my iPhone

LETTER 214: DANA JACQUES

Response to Comment 214-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 215



BoardClerk@Placer.ca.gov, SupervisorGore@Placer.ca.gov,
rdahlgren@Placer.ca.gov,cdraecs@Placer.ca.gov

March 6, 2024

RE: Placer County's Housing Element program HE-1

I am concerned about the proposals for changing to R-30 areas in the Dry Creek neighborhood, specifically Property designated as #8 which is located on 8101 East Drive, Roseville.

215-1 What and where are the undeveloped areas of Placer County zoned for housing that are already carrying their share of allotted low, and low, low-income housing requirement.

Which County department developed the new high-density zoning? I do not believe they realize what a rural area is or the tragic effects of an R-30 development neighboring a rural area.

215-2 Section 8 voucher holders will not be excluded from R-30 housing. All the additional people will create danger to those of us who reside down the lane from this housing. We walk ourselves, our pets, our horses etc. on our lanes with no sidewalks, sewage drainage systems, or street lights. There will be an increased danger to wildlife in our area (which we love and protect) and yes, being a widow, I am afraid for my safety and wellbeing.

215-3 While it has been stated there is no timeline for completion of the housing units, we all realize there are developers just waiting to make a large margin of profit as soon as possible.

215-4 While it has been stated that where infrastructure is inadequate, projects would be required to pay a fair share of fees to fund improvements, construct improvements, or pay hook up costs. What is considered a fair share cost and to whom would the additional fees be placed? Who would pay the continuing costs? Those of us in the adjacent rural areas?

215-5 I read in an environmental document that the 8101 East Drive, Property #8, had sufficient infrastructure as the area could hook up to City of Roseville utilities. Has this been approved by the City of Roseville?

215-6 If the appropriate Placer County Boards had been on top of what happens in the building industry in Placer County and not permitted mitigation, this problem would not exist and our state quota of low and low, low-income housing would already have been met.

I am deeply disappointed in the Planning Department and Board and the Placer County Board of Supervisors who have allowed this problem to develop.

Respectfully submitted,
Alice Jenkins

LETTER 215: ALICE JENKINS

Response to Comment 215-1
The comment is an introductory statement and expresses general concerns regarding the project but does not specifically address the adequacy of the Draft EIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 215-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 215-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 215-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 215-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 215-6
The comment is a closing statement and expresses general concerns regarding the project but does not specifically address the adequacy of the Draft EIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 216

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: R-30 8101 East Drive
Date: Tuesday, March 19, 2024 10:57:24 AM
Attachments: Outlook-33obe1z1.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:08 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: R-30 8101 East Drive

Robyn A. Dahlgren

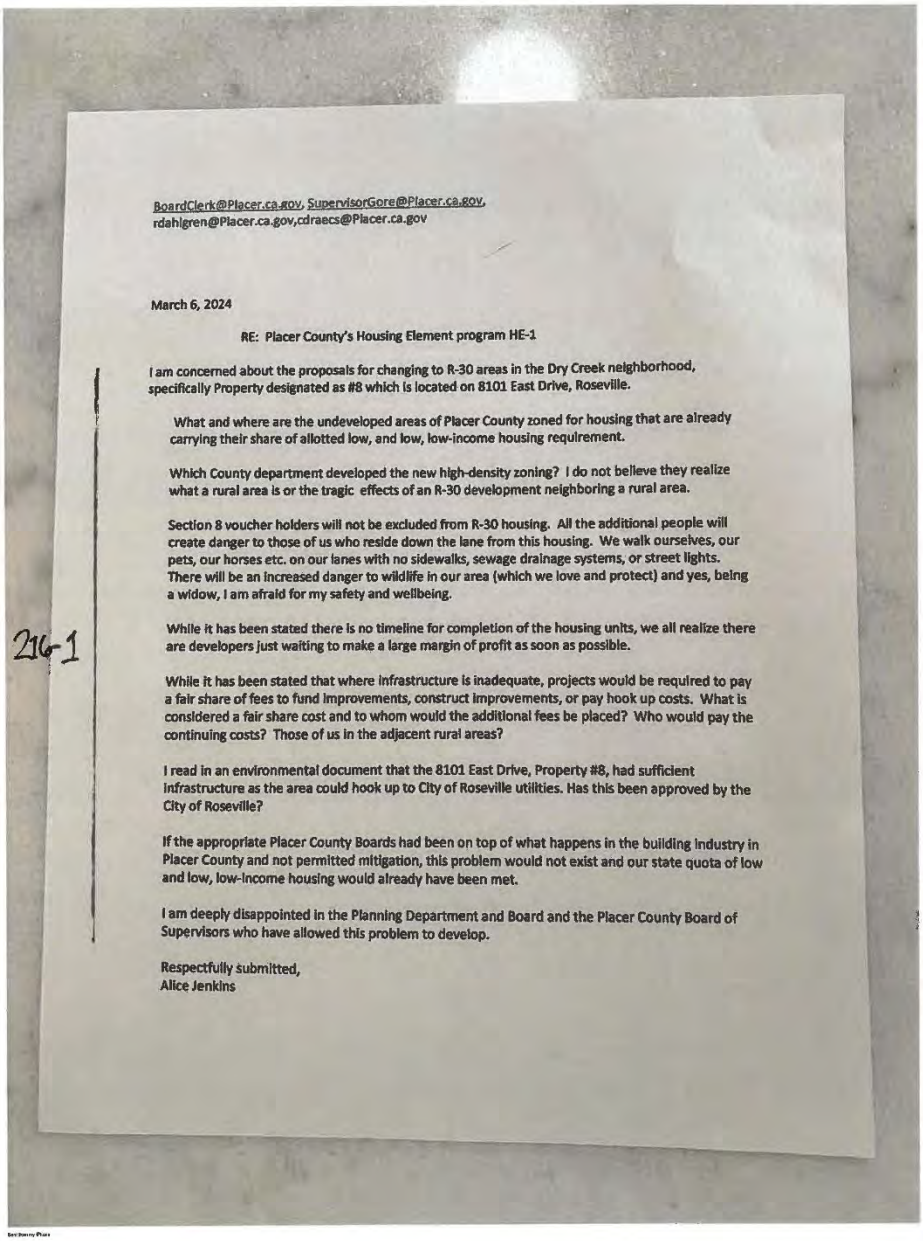
Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Alice Jenkins <rosevillealice68@gmail.com>
Sent: Wednesday, March 6, 2024 1:43 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: R-30 8101 East Drive



BoardClerk@Placer.ca.gov, SupervisorGore@Placer.ca.gov,
rdahlgren@Placer.ca.gov,cdraecs@Placer.ca.gov

March 6, 2024

RE: Placer County's Housing Element program HE-1

I am concerned about the proposals for changing to R-30 areas in the Dry Creek neighborhood, specifically Property designated as #8 which is located on 8101 East Drive, Roseville.

What and where are the undeveloped areas of Placer County zoned for housing that are already carrying their share of allotted low, and low, low-income housing requirement.

Which County department developed the new high-density zoning? I do not believe they realize what a rural area is or the tragic effects of an R-30 development neighboring a rural area.

Section 8 voucher holders will not be excluded from R-30 housing. All the additional people will create danger to those of us who reside down the lane from this housing. We walk ourselves, our pets, our horses etc. on our lanes with no sidewalks, sewage drainage systems, or street lights. There will be an increased danger to wildlife in our area (which we love and protect) and yes, being a widow, I am afraid for my safety and wellbeing.

216-1

While it has been stated there is no timeline for completion of the housing units, we all realize there are developers just waiting to make a large margin of profit as soon as possible.

While it has been stated that where infrastructure is inadequate, projects would be required to pay a fair share of fees to fund improvements, construct improvements, or pay hook up costs. What is considered a fair share cost and to whom would the additional fees be placed? Who would pay the continuing costs? Those of us in the adjacent rural areas?

I read in an environmental document that the 8101 East Drive, Property #8, had sufficient infrastructure as the area could hook up to City of Roseville utilities. Has this been approved by the City of Roseville?

If the appropriate Placer County Boards had been on top of what happens in the building industry in Placer County and not permitted mitigation, this problem would not exist and our state quota of low and low, low-income housing would already have been met.

I am deeply disappointed in the Planning Department and Board and the Placer County Board of Supervisors who have allowed this problem to develop.

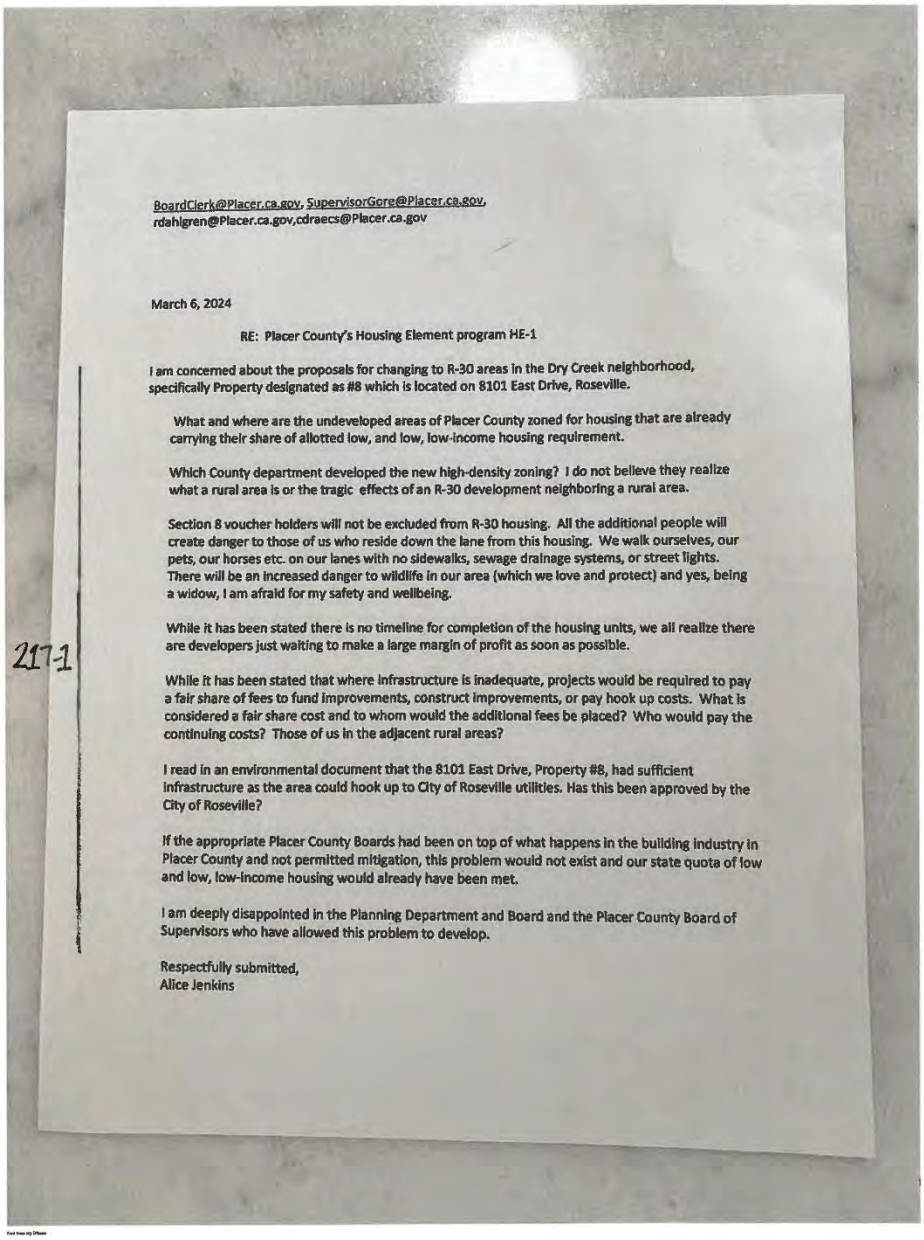
Respectfully submitted,
Alice Jenkins

LETTER 216: ALICE JENKINS

Response to Comment 216-1

Please see Responses to Comments 215-1 through 215-6.

Letter 217



BoardClerk@Placer.ca.gov, SupervisorGore@Placer.ca.gov,
rdahlgren@Placer.ca.gov,cdraecs@Placer.ca.gov

March 6, 2024

RE: Placer County's Housing Element program HE-1

I am concerned about the proposals for changing to R-30 areas in the Dry Creek neighborhood, specifically Property designated as #8 which is located on 8101 East Drive, Roseville.

What and where are the undeveloped areas of Placer County zoned for housing that are already carrying their share of allotted low, and low, low-income housing requirement.

Which County department developed the new high-density zoning? I do not believe they realize what a rural area is or the tragic effects of an R-30 development neighboring a rural area.

Section 8 voucher holders will not be excluded from R-30 housing. All the additional people will create danger to those of us who reside down the lane from this housing. We walk ourselves, our pets, our horses etc. on our lanes with no sidewalks, sewage drainage systems, or street lights. There will be an increased danger to wildlife in our area (which we love and protect) and yes, being a widow, I am afraid for my safety and wellbeing.

217-1

While it has been stated there is no timeline for completion of the housing units, we all realize there are developers just waiting to make a large margin of profit as soon as possible.

While it has been stated that where infrastructure is inadequate, projects would be required to pay a fair share of fees to fund improvements, construct improvements, or pay hook up costs. What is considered a fair share cost and to whom would the additional fees be placed? Who would pay the continuing costs? Those of us in the adjacent rural areas?

I read in an environmental document that the 8101 East Drive, Property #8, had sufficient infrastructure as the area could hook up to City of Roseville utilities. Has this been approved by the City of Roseville?

If the appropriate Placer County Boards had been on top of what happens in the building industry in Placer County and not permitted mitigation, this problem would not exist and our state quota of low and low, low-income housing would already have been met.

I am deeply disappointed in the Planning Department and Board and the Placer County Board of Supervisors who have allowed this problem to develop.

Respectfully submitted,
Alice Jenkins

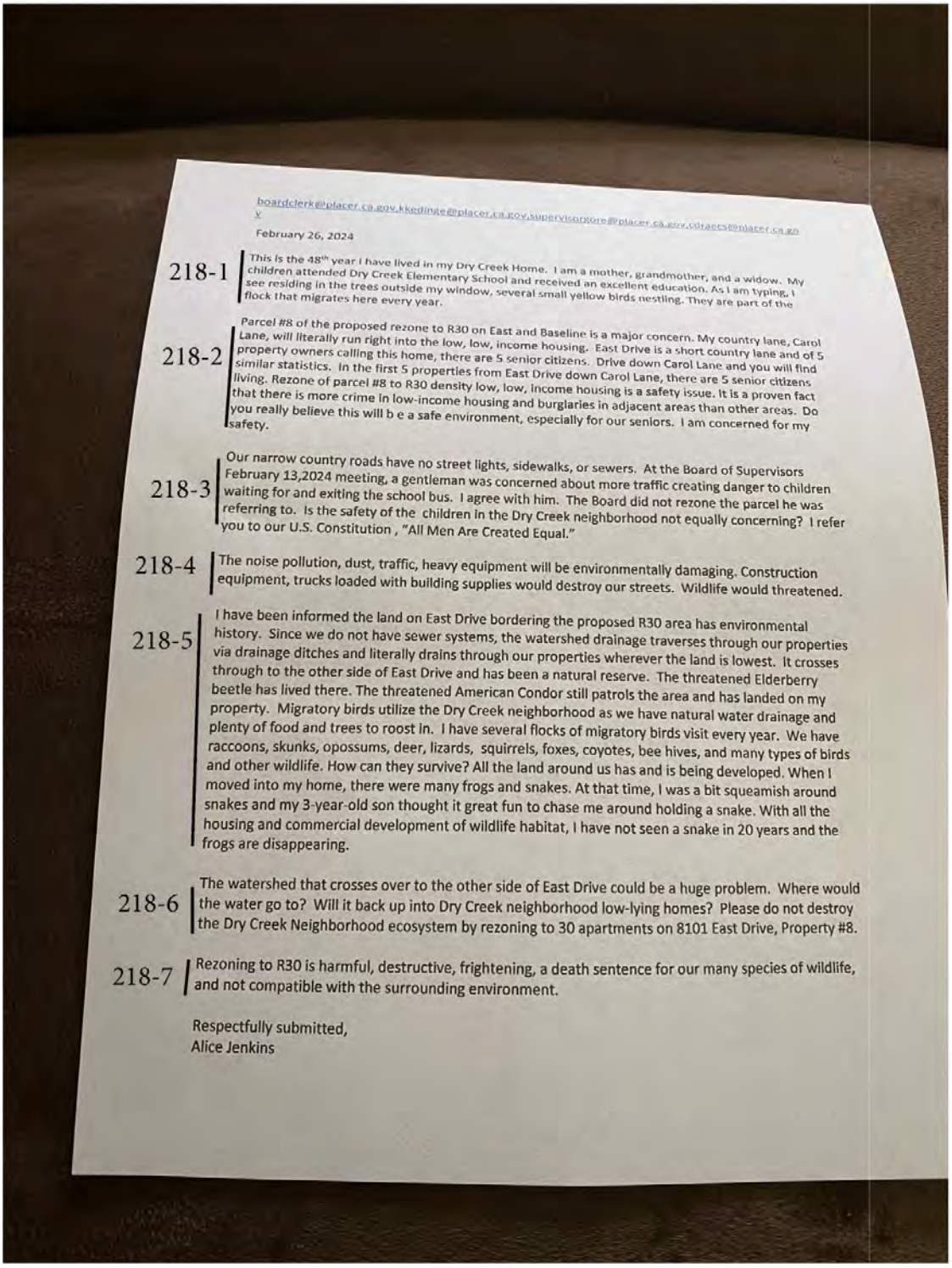
LETTER 217: ALICE JENKINS

Response to Comment 217-1

Please see Responses to Comments 215-1 through 215-6.

Letter 218

From: Alice Jenkins
To: Placer County Environmental Coordination Services
Subject: R30, Parcel #8, 8101 East Drive
Date: Monday, February 26, 2024 10:56:03 AM



boardclerk@placer.ca.gov,kkedinge@placer.ca.gov,supervisorgore@placer.ca.gov,cgraves@placer.ca.gov

February 26, 2024

218-1 This is the 48th year I have lived in my Dry Creek Home. I am a mother, grandmother, and a widow. My children attended Dry Creek Elementary School and received an excellent education. As I am typing, I see residing in the trees outside my window, several small yellow birds nestling. They are part of the flock that migrates here every year.

218-2 Parcel #8 of the proposed rezone to R30 on East and Baseline is a major concern. My country lane, Carol Lane, will literally run right into the low, low, income housing. East Drive is a short country lane and of 5 property owners calling this home, there are 5 senior citizens. Drive down Carol Lane and you will find similar statistics. In the first 5 properties from East Drive down Carol Lane, there are 5 senior citizens living. Rezone of parcel #8 to R30 density low, low, income housing is a safety issue. It is a proven fact that there is more crime in low-income housing and burglaries in adjacent areas than other areas. Do you really believe this will b e a safe environment, especially for our seniors. I am concerned for my safety.

218-3 Our narrow country roads have no street lights, sidewalks, or sewers. At the Board of Supervisors February 13,2024 meeting, a gentleman was concerned about more traffic creating danger to children waiting for and exiting the school bus. I agree with him. The Board did not rezone the parcel he was referring to. Is the safety of the children in the Dry Creek neighborhood not equally concerning? I refer you to our U.S. Constitution , "All Men Are Created Equal."

218-4 The noise pollution, dust, traffic, heavy equipment will be environmentally damaging. Construction equipment, trucks loaded with building supplies would destroy our streets. Wildlife would threatened.

218-5 I have been informed the land on East Drive bordering the proposed R30 area has environmental history. Since we do not have sewer systems, the watershed drainage traverses through our properties via drainage ditches and literally drains through our properties wherever the land is lowest. It crosses through to the other side of East Drive and has been a natural reserve. The threatened Elderberry beetle has lived there. The threatened American Condor still patrols the area and has landed on my property. Migratory birds utilize the Dry Creek neighborhood as we have natural water drainage and plenty of food and trees to roost in. I have several flocks of migratory birds visit every year. We have raccoons, skunks, opossums, deer, lizards, squirrels, foxes, coyotes, bee hives, and many types of birds and other wildlife. How can they survive? All the land around us has and is being developed. When I moved into my home, there were many frogs and snakes. At that time, I was a bit squeamish around snakes and my 3-year-old son thought it great fun to chase me around holding a snake. With all the housing and commercial development of wildlife habitat, I have not seen a snake in 20 years and the frogs are disappearing.

218-6 The watershed that crosses over to the other side of East Drive could be a huge problem. Where would the water go to? Will it back up into Dry Creek neighborhood low-lying homes? Please do not destroy the Dry Creek Neighborhood ecosystem by rezoning to 30 apartments on 8101 East Drive, Property #8.

218-7 Rezoning to R30 is harmful, destructive, frightening, a death sentence for our many species of wildlife, and not compatible with the surrounding environment.

Respectfully submitted,
Alice Jenkins

LETTER 218: ALICE JENKINS

Response to Comment 218-1
This comment is an introductory statement and does not address the adequacy of the Draft EIR.

Response to Comment 218-2
Please see Master Response 2 – Social and Economic Impacts. An active development proposal does not exist for this site. In addition, neither the County nor State requires development to be deed-restricted for "low, low" income housing. The comment does not provide specific information regarding the association between crime rates and income levels.

Response to Comment 218-3
Sewer lines are located within the roadways adjacent to Rezone Sites #7, #8, #9, and #10. Any future development at these sites would be required to connect to the public sewer line and utility improvements would be constructed as necessary. With respect to traffic-related concerns, please see Master Response 4 – Traffic Safety.

Response to Comment 218-4
For impact discussions and required mitigation measures for construction-generated impacts related to air quality and noise, please see Chapter 4, Air Quality and Greenhouse Gas Emissions; Chapter 7, Noise; and Chapter 11, Statutorily Required Sections, of the Draft EIR. Chapter 11 includes a discussion of the cumulative, and significant and unavoidable impacts related to air quality and noise. For impact discussions and required mitigation measures related to wildlife, please see Chapter 5, Biological Resources, of the Draft EIR.

Response to Comment 218-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 218-6
Mitigation Measures X-1 and X-2 of the Initial Study require preparation of a Final Drainage Report prior to the approval of each future development project. In general, the Final Drainage Reports would specify the existing conditions of each rezone site, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from each project, as well as water quality protection features and methods to be used during construction, and long-term post-construction water quality measures..

Response to Comment 218-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 219

February 13, 2024

To: Suzanne Jones, Supervisor, District 4
Clerk of the Board of Supervisors, Placer County
Kally Kedinger-Cecil, Senior Planner

From: Steve and Julie Jensen
6907 Green Leaf Court
Granite Bay, CA 95746

We are writing with concerns about the proposed Housing Element Program. This program currently designates that the 17 acre property on the corner of **Fuller Drive and Auburn Folsom Road (8989 Auburn Folsom Road)** be rezoned from commercial use to a newly created zoning element, which establishes a maximum of 30 units per acre (510 units total). We are unable to attend the public input meeting today and would appreciate our concerns be addressed.

Our family has resided in the Westlake Estates neighborhood directly across Auburn Folsom Road since 2001. As residents this close in proximity, we think the proposal would have an adverse effect on the surrounding area.

Current traffic patterns along the Auburn Folsom corridor from Beals Point to Douglas Blvd. are already impacted by three new housing developments within a one-mile radius to this proposal. Our neighborhood residents utilize the U-turn on Auburn Folsom Road in order to exit and head north to Douglas Blvd. This U-turn would be completely useless by adding over 510 vehicles to the heavy traffic we are already experiencing all throughout the day.

219-1 Parking for school events as well as sporting events on the weekends would be impossible for attendees who already have to park on Fuller Drive from Auburn Folsom to the school driveway. What would happen to this street parking?

Another major concern is how will San Juan Water District be able to provide water to an apartment complex of this size? We recently went through a significant water pressure drop due to one of the new housing developments on Eureka Road just west of Auburn Folsom Road.

Please look into how many housing developments in this immediate area have been rezoned. We seem to be already impacted significantly in the past couple years.

We ask that you look into these issues and take our concerns into consideration.

We can be reached at (916) 769-0220.

Thank you for your time.

LETTER 219: STEVE AND JULIE JENSEN

Response to Comment 219-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

With respect to water supply, please see Response to Comment 210-4.

With respect to traffic congestion on the streets adjacent to and near Rezone Site #26, please see Response to Comments 370-2, 370-3, and 413-1.

Letter 220

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:07:07 AM

From: Jessica <jessica_on@hotmail.com>
Sent: Friday, March 8, 2024 12:01 PM
To: jess.negrete@hcd.ca.gov; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

220-1

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments

220-1 cont.

would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

LETTER 220: JESSICA

Response to Comment 220-1

Please see Responses to Comment Letter 62.

Letter 221

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element Comments
Date: Friday, March 8, 2024 8:47:47 AM

From: Kris Johnson <kmjohnson7245@gmail.com>
Sent: Thursday, March 7, 2024 11:20 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Christopher Pahule <cpahule@placer.ca.gov>; Suzanne Jones <cliffandsuz@gmail.com>
Cc: Kristine Johnson <kmjohnson7245@gmail.com>
Subject: Housing Element Comments

This housing element plan lacks the most essential ingredient: actual land use planning. This process is ongoing in many locations across the nation, and the solutions lie in existing medium to high density areas where there are roads that can accommodate the traffic, sidewalks for pedestrians to walk, sewer, water, fire and all the basic infrastructure...not in semi rural areas.

Here in Placer county you have foregone planning in favor of a giveaway system to whoever might want this zoning. Disregarded environmental impacts particularly to the residents who are most impacted. Tonight at the MAC dozens of residents testified to the specific terrible impacts of your number 1 selection of parcel 26 located at Fuller and Auburn-Folsom, adjacent to a junior high school, a state park with creeks and wetlands running through it. Because of this arbitrarily forced short time window, I am literally writing this in the 23rd hour of the day and the actual community comments won't be included.

221-1

The right way to come up with these RHNA parcels is to work it through the city and community plans, not just tops down administrative cherry picking. As a MAC member and the chair of our community plan committee, we have been requesting to meet with the county staff for over a year to analyze where our plan needs to be updated in accordance with new state housing/land use requirements. In the mean time, a state mandate was also issued regarding community plan updates...we were ahead of that mandate, but still ignored. We could have done what other communities do...rezone areas that make sense. For example, Old Auburn-Sierra College, could have had a larger area rezoned, you have already spot rezoned for higher density, why not extend the zoned area?

Because of the way this process has been handled, we have over a thousand angry people, signing petitions, etc. Lawyers, start your billing meters. Many residents will attend planning and BOS hearings on this topic. Let's do this right: residents know that affordable housing is needed, but the county's game plan so far is not the way to make it happen.

Please reject this RHNA proposal and force the staff to come up with a Real Plan to meet RHNA. 400 pages of "study" does not a reality plan make AND the state is likely to see right through the gamesmanship. No

221-1 cont.

affordable housing ever has to be or will be built in our area but landowners will get big breaks and be able to build expensive, multistory condos.

LETTER 221: KRIS JOHNSON

Response to Comment 221-1

Please see Master Response 1 – Non-EIR/Administrative Issues. Regarding concerns about Rezone Site #26, please see Responses to Comment 52-2.

Letter 222

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: SACOG RHNA BOS Hearing questions
Date: Tuesday, February 20, 2024 9:25:39 AM

From: Scott Johnson <scottj@johnsonpianoservice.com>
Sent: Thursday, February 15, 2024 9:46 AM
To: Christopher Pahule <cpahule@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Bridget Powers <bpowers@placer.ca.gov>; Sophie Fox <sfox@placer.ca.gov>
Subject: SACOG RHNA BOS Hearing questions

Hi Christopher and Kally,

222-1 Thank you for your work preparing and presenting the SACOG RHNA information at the rezone hearing on Tuesday night.

Here are a few questions I did not hear answers to by the time I had to leave at 7:00pm.

222-2 1. What leverage does Placer county have to compel builders like Taylor Builders at Placer One if they are allowed to build all their market rate units before they are required to break ground on any units that might qualify as workforce housing? Here is a quote from the Taylor Builders website where they have published an interview they did with the Sac Business Journal.

"About a year or two after the first homes get underway, Taylor said, the "1B" and "1C" phases of Placer One would include sites for multifamily development, smaller-lot single-family homes, student housing, a small senior living community and the first part of a town center. How quickly those components are built will also depend on market demand, he said."

It does not sound to me like the builder is feeling any pressure or responsibility to build any workforce housing. If he can justify building more single family homes instead of workforce housing due to market demand as he interprets it, what is to stop him?

Why does the county not require that workforce units be constructed either before or simultaneously to the market rate units?

222-3 2. Given the admission by both the Placer County Board chair and my Supervisor Cindy Gustafson during the Tuesday night hearing that the county has failed to take the needed actions to assure workforce housing is built and that there is no assurance that the rezoned properties will be built out with anything other than market rate units, what actions are you recommending the Supervisors take to incentivize builders to actually build workforce housing units? I had suggested in public comment

222-3 con't

that the impact fees on higher price point single family homes be increased and the funds from that increase be used to subsidize or waive the impact fees for workforce housing development. Is this a viable approach? I can suggest many other ways that Placer County can take action to create incentive to build workforce housing but I would like to hear which approaches you think our county should pursue.

222-4

3. I was glad to hear Christopher explain the rationale of the SACOG RHNA guidelines which have the goal in integrating a variety of housing price points into high opportunity neighborhoods. This has been proven in many locations across the country and the world to be the very best way to bring families out of poverty permanently. Will the county create a public information campaign to illustrate this fact?

222-5

4. In public comment I mentioned that I liked the idea of allowing/encouraging conversion of long vacant commercial properties into workforce residential units. I sited the example of the 9 long vacant units in the Bel Air shopping center within walking distance of the Government Center, hospital, senior center, shopping and bus stop. Is the County working on that and could those units be counted in your RHNA numbers?

I am truly curious to hear some feedback from someone on these questions please,

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

222-6

PS: The principle from the Pine Hills Jr. Academy off Old Airport Rd asked a question in public comment on Tuesday night regarding apparent changes to the former building restrictions in that area due to the flight path of the airport. Did he get an answer to his question and if so what are the changes?

LETTER 222: SCOTT JOHNSON

Response to Comment 222-1
This comment provides an introductory statement and does not address the adequacy of the Draft EIR.

Response to Comment 222-2
This comment does not address the adequacy of the Draft EIR.

The County requires development agreements and/or affordable housing plans for housing projects that are required to provide affordable units. These agreements outline the number of units required and the timing of construction. For example, Placer One's Development Agreement provides the following schedule for affordable units:

> As required in the Development Agreement, ten percent of PRSP's units, or 564 units, will be built onsite and designated as affordable. Specific details regarding the timing and triggers for construction are noted in the Development Agreement, Section 5.12:
>
> - Construct or cause to be constructed 25 percent of the required low and very-low income affordable housing units no later than issuance of the building permit for the 2,818th market rate unit (likely triggered in Phase 2A).
> - Construct or cause to be constructed 50 percent of the low and very-low income affordable housing units no later than issuance of the building permit for the 3,945th market rate unit (likely triggered in Phase 2B).
> - 100 percent of the affordable units shall be constructed no later than issuance of the building permit for the 4,059th market rate unit (likely triggered in Phase 2B).
>
> The affordable units are proposed to be located in the town center on Large Lot parcels PR 42, 44, and 48 near transit, job centers, and the university. PR 41, located toward the western boundary of the specific plan, is also a planned site for affordable units as it abuts Amoruso Ranch's high-density residential area in the City of Roseville.

This comment regarding the timing of construction of affordable units has been forwarded to the decision-makers.

Response to Comment 222-3
This comment is similar to Comment 222-2 with respect to the timing of construction of affordable units. The comment suggests that impact fees should be increased on higher priced single-family homes and impact fees should be waived for workforce housing development. These policy suggestions do not address the adequacy of the Draft EIR, and this comment has been forwarded to the decision-makers.

Response to Comment 222-4
The comment notes the rationale of RHNA is to integrate a variety of housing price points into high opportunity neighborhoods and asks if the County will create a public information campaign to illustrate this fact. This comment does not address the adequacy of the Draft EIR, and has been forwarded to the decision-makers.

Response to Comment 222-5

This comment does not address the adequacy of the Draft EIR. For informational purposes, Housing Element Program HE-B-7, which has yet to be implemented, speaks to such a program that is anticipated to be initiated in 2025:

> **HE-B-7: Conversion of Commercial Properties.** The County shall encourage the repurposing of existing buildings (commercial, industrial, and residential) appropriate for affordable housing. *[Source: New policy based on housing stakeholder input]*

Response to Comment 222-6

This comment does not address the adequacy of the Draft EIR. This comment asks if the Pine Hills Jr. Academy off Old Airport Road was made aware of airport overflight rule changes. The County has notified all property owners that were now under airport overflight rules after the Airport Land Use Compatibility Plan was updated. New restrictions are not proposed for the school site.

Letter 223

From: Aliana Jones
To: Placer County Environmental Coordination Services
Subject: Housing Rezone Program Draft Environmental Impact Report (DEIR) Comment
Date: Monday, March 18, 2024 2:29:08 PM

The DEIR for the proposed Placer County high density housing is flawed for many reasons. In an **attempt to rectify the problems created by the fact that the county has not made the new developments within the county over the past 20 years meet their 10% low-income housing requirement (per county resolution),** they are willingly ignoring the massive problems created by their proposed rezoning with the explanation, "It is housing the probably won't be built anyway because most developers don't want to build that type of housing as it is not cost effective for them." **If the plan is to not build such housing, then the logic works well to purposely put that zoning of lands that are not feasible to build upon. If that is not the plan, then the following environmental impacts can not be ignored.**
Specifically highlighted here are proposals in three areas of the county. Two of which I am personally familiar and one that I have only become acquainted with over the past 3 weeks in listening to testimony given by individuals in those areas given at Board of Supervisor and Planning Commission meetings.
The **four proposed sites (7, 8, 9, & 10) within the Dry Creek Community** have multiple flaws-with some of the problems with each site listed individually—which is part of the problem with **the report as it does not cover each site individually** but, as was **stated by the county planners (and a supervisor), is "only a broad statement for the county and when a specific proposal comes in, then those specific issues will be mitigated**." This would be after the rezoning has already taken place and the wheels have been set in motion to attempt to build high-density housing in an area that should not have it. **Broadly speaking, however, all of these sites are covered by finite county resources (Cal Fire, Placer County Sheriff)** which are extremely limited in time response and will endanger the lives of those who reside here as a larger and larger population is forced into this small area. **All of these proposed sites are surrounded by long-standing 1-2 acre minimum parcels** whose residents are on **wells and septic systems and rely on the ground water** which is **being depleted** by the **sinking of large wells by the city of Roseville**—potentially causing these long established small wells to go dry or be contaminated by infiltration of contaminants identified years ago from the nearby shut down air force base. And the addition of these long-established rural properties to city water may force these agricultural parcels, many of which have livestock, to not be able to afford to keep their properties properly watered not only for the livestock but also for fire mitigation. **All of these parcels (7, 8, 9, & 10) are currently zoned agricultural/low density housing** which is not only in keeping with the lifestyle of the residents also **allows for enough open space to provide somewhat for the replenishing of the underground aquafers which feed the area**-something which is currently threated by the encroaching city paving and would be further exacerbated by the paving required for high-density housing. And all of these proposed **sites feed the local elementary school district (Dry Creek Elementary)** and that **school district was never consulted about the impact** to the local school system. The high school district (Roseville High School district) may also not have been contacted.
In addition to the above-mentioned problems, **lot 7 (Vineyard Road)** is in a **flood**

223-1

plain making it highly unlikely to be able to be built upon—at least for high density housing. The **dry creek bed** that runs through this property is the **flow for areas connected to lot 8** and **any restriction of flow through this area risks the flooding of houses near area 8 (East Drive).** This **drainage would also eventually flow into Dry Creek** and potentially threaten the habitat there (along with the current wildlife that live within this parcel).Additionally, this is directly **adjacent on one side to a new development** that is being built in which the residents were unaware that this high-density housing rezoning was being proposed. On the **other side, it is surrounded by a large tract of agricultural land that then borders smaller rural housing** again with landowners who have **wells, septic systems and livestock.** **Lot 8 (East Drive AKA The Strawberry field**) is also currently **zoned agricultural/low density housing.** It serves the local community by providing fresh fruit and vegetables. It is the **start of the flow area for drainage from the surrounding community down to lot 7 and away**. In the past, additional drainage from the city of Roseville (across Baseline) has caused backup of water across the lower parcels and creating flooding havoc for properties near to East Driver. **All lots adjacent to this proposed rezoning are 1-2 acre minimums (several of which have livestock or bees).** At least one property bordering this **lot had their well run dry in recent years** and they were **unable to redrill a well because of the flood plain issue.** Another lot directly adjacent to it has **goats** which have been known to escape their pens. On East Drive, Carol Lane and Central (the country roads sitting right beside this proposed site) has **small country roads without sidewalks or street lights** on which people **ride horses and walk their dogs** around the block. The **area directly connected** to it has **over 30 senior citizens who have lived in this community for 30-80 years**. Suddenly **brining in high-rise, high-density apartment buildings would be a total destruction of their community on numerous levels**.

223-1 cont.

Lots 9 & 10 are **directly across from an elementary school** (K-8) which currently is at capacity. It also sits on a **rural two-lane road** which has **numerous accidents.** It is also **served by the county sheriff's office** and has had **problems with response times in emergency situation**s. This site also sits almost adjacent to the local creek (Dry Creek) which has had flooding issues but runoff from the **additional paving required by an apartment complex could pose toxic runoff problems into said creek**. The additional **traffic congestion** caused by this development on that **two-lane road would be detrimental to land owners farther up the road**.

Moving out of the Dry Creek area, the proposal to put apartments in the **Sheridan area** is flawed for multiple reasons. First, the lack of resources such as **fire and police protection** (served by the county sheriff). Second, the **lack of access to shopping** (there is only a small convenience store in town and the nearest availability of large-scale shopping is more than 15 miles away). There are also **not local jobs and there is not access to any regional transit.**

It needs to be stated that most of these area properties that the County has specifically pursued—not a developer pursuing the County for a rezone—except it seems for one property in **Auburn** in which the **developer is wanting to put luxury apartments** into an area near a ravine that was previously not zoned for apartments. **If this develop goes in for luxury apartments, it seems that it would not meet the purpose of this rezoning proposal which is to find places for low-income, high-density housing—thus causing the County to seek other places for those**

223-1 cont.

units.
As you should be able to see, **the overall DEIR submitted by Placer County is flawed on multiple counts and needs to be sent back for further review of individual sites** if the goal is to make a plan that works and not destroy existing communities.
Allana Jones

LETTER 223: ALLANA JONES

Response to Comment 223-1

Please see Responses to Comment Letter 76.

Letter 224

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element amendment 2024 and Housing Element Appendix F
Date: Monday, March 11, 2024 10:02:36 AM

From: thjonesarelli@aol.com <thjonesarelli@aol.com>
Sent: Friday, March 8, 2024 8:29 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Frank Udvarhely <fudvarhely@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Housing Element amendment 2024 and Housing Element Appendix F

Placer County Board of Supervisors:

To whom it may concern,

224-1

Please reconsider your proposal for site 26. Currently, I live very close to said site. We have personally been effected deeply by the growth in the area. The number of commuters driving from Roseville to Folsom and Auburn is already way beyond what our small community can withstand. Right now, it takes 15-20 minutes at times just to get out of our street onto Auburn Folsom taking a chance of losing our lives due to such insane traffic. It has become too dangerous to walk anywhere near this intersection. Having a child walk home from Cavitt Stallman school is way too dangerous. There are accidents at the intersection more often than there should be. Recent construction from Soleil diverted 26 acres of water to enter our yard, changing the topography and now causing erosion while destroying our property. Not to mention. the only bridge in and out of our street. The wildlife in the area are barely hanging on, due to then current ongoing construction.

We have lived in this area a very long time and all the construction in the past couple years, has effected our community deeply. I am not against helping people but at what cost to the people who already lived in this community? Have you truly looked into the number of accidents happening already? Would you want your child walking home in this type of traffic? Have you done the proper testing on the effects to the wildlife left behind? Just heartbreaking… There are many suburban parts to Granite Bay. However, mine is actually rural and what is happening to the master plan is unethical to say the least. Please find it in your hearts to truly reconsider.

Thank you for your time.

Warmest regards,

Trisha Jones

LETTER 224: TRISHA JONES

Response to Comment 224-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 225

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: RHNA20/30
Date: Tuesday, March 19, 2024 10:54:30 AM

From: zenith jones <zenith.jones@yahoo.com>
Sent: Monday, March 18, 2024 4:59 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; zenith jones <zenithjones@hotmail.com>
Subject: RHNA20/30

Hi Kally,
I'm wanting to object again to the RHNA 20/30, (16/24-in this particular sites case), which is literally only the size of 4 homes sites. Sheridan the little "village" has a Post Office, an Elementary school, a snack/beer/bait stop, a family owned/operated oil change shop, a family owned/operated coffee/donut shop and a VOLUNTEER Fire Department. There is NO public transportation, NO grocery store, NO doctor, NO Dentist, NO job opportunities, NO social services, NO police, NO emergency services,(it takes 20 minutes for them to get here for a 911 call), NOTHING for anyone without a car. NO Junior High or High School-they have to be bussed 7+miles away to Lincoln for school any higher than elementary. What happens when they miss the bus and Mom or Dad have no car? They have to stay home, the only way to Lincoln is down dangerous highways. The object of RHNA20/30, from what my little mind can gather is compassion for those with less, in that you, the government, is rezoning previous residential and other sites to be able to accommodate more people in a group housing of some sort. Condos, duplexes, quadplexes, small footprint/high density homes or apartment buildings so that there is affordable housing in the area. The most kind and compassionate way to do this is to put them, these new housing developments, near work, food resources and emergency services all within walkable range. Placing 16-24 units on Site 11, or even more on Site 12 is NOT KINDNESS AND COMPASSION AND DOES MORE HARM THAN GOOD TO THESE POOR THAT WOULD MOVE INTO THESE SITUATIONS. They might have a job when they move in, but, like they often do, cars break down, they might miss work and get fired from their job because of it, now they're STUCK 7+ MILES from Lincoln and 3+MILES from Wheatland and any potential job prospects, which are few and far between these days, Also, if they find a job, that's a long walk twice a day. There

225-1

225-1 Cont.

is no concern for the less fortunate in stranding them in an area which offers them NOTHING in the way of BASIC NEEDS! Sheridan is NOT a good option for the apartments idea, 16-24+ units with how many people in that small area? Anywhere from 16-a few hundred or more. What are the occupancy limits on these units? Size maximum and minimums? Parking requirements and services to be provided by the builder/owners? Sound, pollution and other remediation to be provided by the builders? These high density parcels will definitely DEVALUE MY PROPERTY AND EVERYONE ELSES SURROUNDING THEM, how will we be compensated for this decrease in our property? Some of us have been here 30+years, our homes are our retirement incomes, how will the government compensate that loss of income to me and other property owners? The cart is so far before the horse the driver can't see it in this situation and I, my husband and others in my little village of Sheridan urge you to remove these Sites, 11 and 12, from your list and allow them to remain what they are currently. Maybe when we get more services, this little hamlet can be looked at again, but, things are out of order with this RHNA20/30 REZONING and you, the government, would be doing NO ONE a service by allowing them to build anything more than a single family home or business that could benefit our town with prospective jobs and tax dollars to be built here, on these sites. Thank you,

Zenith Jones
POB 86, 5787 CFW Rd. (literally backs up to Site 11)
Sheridan, CA 95681

LETTER 225: ZENITH JONES

Response to Comment 225-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 226

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Info. request
Date: Tuesday, February 20, 2024 9:06:11 AM

From: zenith jones <zenith.jones@yahoo.com>
Sent: Friday, February 2, 2024 10:02 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; zenith jones <zenithjones@hotmail.com>
Subject: Info. request

Hi!

226-1 I would appreciate a link or printed information on the "Housing Element Sites Rezone program" if available for review. Please also add me to any mailing list that will disperse updates on this specific project in the future. I live in Sheridan and have been here 30 years this summer and I'm interested in what's happening out here, or might happen. I would also like the Zoom info., if available, for the meeting at 2 p.m. on Feb. 13th. I won't be able to make it up the hill to Auburn to attend.

Thank you for all your help in advance.
Sincerely,
Zenith Jones
POB 86, Sheridan, CA 95681
zenith.jones@yahoo.com

LETTER 226: ZENITH JONES

Response to Comment 226-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 227

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Remove Sites 71 and 72 from the Placer Rezone List
Date: Tuesday, February 27, 2024 9:14:01 AM

From: Cathy Jordan <cathy.jordan22@gmail.com>
Sent: Tuesday, February 27, 2024 8:48 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fwd: Remove Sites 71 and 72 from the Placer Rezone List

To: kkedinge@placer.ca.gov
Subject: Remove Sites 71 and 72 from the Placer Rezone List

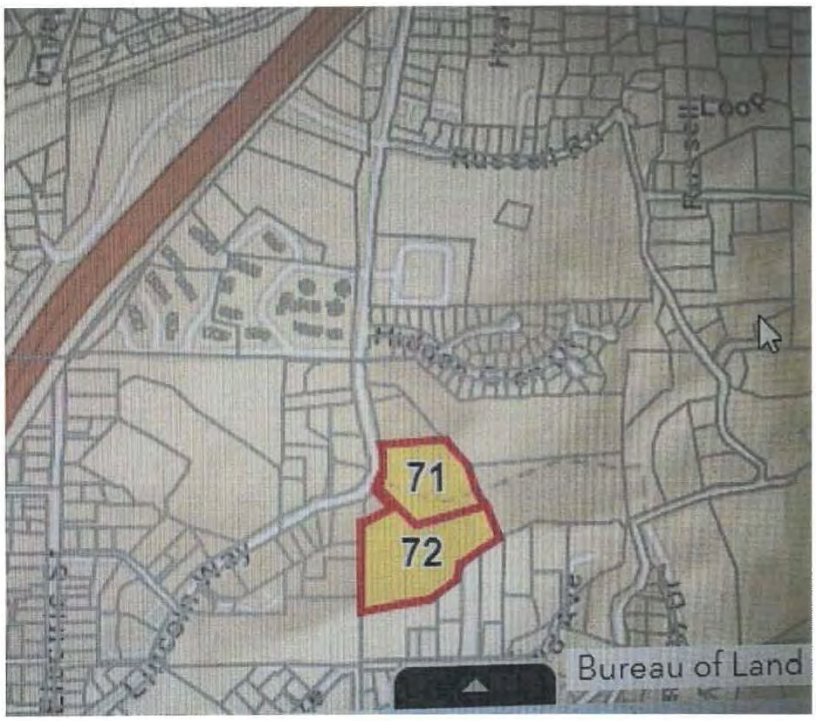
227-1

Sites 71 and 72 should be removed from the Placer Rezone list. There is already a huge issue with traffic in this area. There are already several other high density housing sites in this area, and traffic infrastructure can't begin to accommodate any further high density development. Currently the traffic congestion, noise, and exhaust fumes from hundreds of vehicles per hour are all at unbearable levels. Adding more units will only make an already miserable situation worse.

This are is right near Alta Vista School and a semi-rural area. There is no logical reason why these areas should be developed into high density housing for any reason. There are plenty of other areas outside the city limits in and beyond North Auburn where there is space and infrastructure to accommodate.

Again, I would beg the question: Why has Auburn been targeted with a huge share of potential rezone sites? We came to this area 44 years ago to get away from the noise and traffic of urban areas. We did not create new housing; we bought a vintage home and restored it. We came here for the rural value. We did not come here to see our hometown carved up into slices of jam-packed development. Please remove these sites from the list.

227-1
Cont.



<1708217261733blob.jpg>

Sincerely,

Robert Jordan

LETTER 227: CATHY JORDAN

Response to Comment 227-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, as well as Responses to Comments 2-12, 2-14 and 174-2.

Letter 228

Steve Kastan
205 Alpine Meadows Rd #33
Alpine Meadows, CA96146
March 9, 2024

Placer County Planning Services Division
3091 County Center Drive
Auburn, CA 95603
Re: Housing Element Sites Rezone / Placer County, CA
235 Alpine Meadows Road

Dear Planning Services,

228-1 In regards to Housing Element Sites Rezone / Placer County, CA, I received notice on the rezoning change for the property at 235 Alpine Meadows Road as I live within 300 feet of the property. 235 Alpine Meadows Road was originally a motel that was converted to apartment units 20 years ago (Minor Use Permit). It currently operates as affordable workforce housing that Tahoe desperately needs.

I don't see the need to change this zoning just to satisfy the State that the County appears to be doing something about affordable housing (State's Regional Housing Needs Assessment (RHNA).

Sincerely,

Steve Kastan

Steve Kastan

RECEIVED
MAR 12 2024
CDRA - Planning

LETTER 228: STEVE KASTAN

Response to Comment 228-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 229

From: J Keith
To: Placer County Environmental Coordination Services
Subject: Housing Elements Rezone DEIR
Date: Thursday, February 22, 2024 11:05:22 AM

Regarding the Parcel at 3865 Old Auburn Rd, Granite Bay, part of the Housing Element Program HE-1 Rezone proposal I submit the following comments and ask that this parcel be removed from the rezone proposal.

I am a resident of Woodbridge Ranch located off Old Auburn Rd and Sierra College Blvd. A community of single family residences on 1+ acre lots.

Since 2017 the following low density to high density rezones have been approved by the Board of Supervisors within a 2 mile radius of my home over rejection by the Granite Bay MAC and subject to 3 law suits. Three of the projects listed below are within a quarter mile of my home as is the proposed parcel at 3865 Old Auburn Road:

229-1

1) The Park at Granite Bay- 55 homes on 16 acres

2) Wellquest Senior Living- 114 residential units on 4.5 acres

3) Sierra Grove (Placer Retirement Residences)- 145 residential units on 8.9 acres

4) Eureka Grove- 72 homes on 20 acres

5) Greyhawk II- 21 homes on 10 acres

6) White Hawk- 55 homes on 33 acres

That's a total of 462 residential units rezoned to high density on parcels that were originally zoned for lower density. Again, within just a two mile radius from Woodbridge Ranch and 314 of those units are within a quarter mile. At peak times waiting to exit Woodbridge Ranch onto Old Auburn Road requires waiting for as many as 20 vehicles to pass in just one direction. The parcel at 3865 Old Auburn Rd is less than one quarter mile from that Woodbridge Ranch exit and the only egress from that parcel will be onto Old Auburn Road.

Within a 5 mile radius even more low density to high density projects have been approved. Traffic and service burdens on the Sheriff and So Placer Fire District increase with each high density rezone.

Enough high density is enough for this area of Placer County. Please remove the parcel at 3865 Old Auburn Rd from the Housing Element Rezone Proposal.

LETTER 229: J. KETIH

Response to Comment 229-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies, and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 230

From: naymel munir
To: Placer County Environmental Coordination Services
Subject: 3865 Old Auburn Road
Date: Monday, March 18, 2024 1:52:56 PM

To Whom It May Concern,

230-1 I am writing ing to express my strong support for the approval of the proposed affordable housing project in Granite Bay. Having grown up here, I am deeply connected to this community and aspire to continue living here after completing my college education. However, the reality of high living costs poses a significant challenge. It's imperative that Granite Bay develops affordable housing options, ensuring that young adults and recent graduates have the opportunity to buy or rent within this community. This development is not just a convenience; it is a necessity for maintaining the vitality of Granite Bay, offering sustainable living options for those starting their careers.

Sincerely,
Naymel Khan

LETTER 230: NAYMEL KAHN

Response to Comment 230-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 231

From: A Killany
To: Placer County Environmental Coordination Services
Subject: High Density Housing consideration next to Cavitt Jr. High (Property #26)
Date: Friday, March 15, 2024 9:16:36 AM

To whom it may concern,

231-1

I absolutely oppose the consideration of rezoning the property next to Cavitt Jr. High to allow 510 units of housing of any kind let alone low income housing. This area does not have the infrastructure to support this many units nor can Auburn Folsom Road handle the increase of traffic with the addition of 510 to 1020 automobiles from this complex. Auburn Folsom Road and Douglas Boulevard are already overwhelmed with traffic and have become more of a freeway than a county back road. I believe that the needs of the people that would be living in this low income housing are also being ignored. Granite Bay is an area, not a town, and does not provide the services, jobs and public transportation usually required for low income residents to thrive.

Having been born and raised not far from this property in question, I have seen much change and development in the Granite Bay Area. What was once was a beautiful quiet countryside place to live has now become an overpopulated noisy suburb with increased crime. All the charm that had drawn people to want to live in this area is slowly being destroyed by too much development and will soon lead

231-1
Cont.

this beautiful area to its downfall.

I live within a mile of this location and have **Great Horned Owls** and **Red Hawks** that nest in my yard every year. I also have **Eagles** that live nearby. These raptors breed and hunt in territorial areas that are right here and do not do well with change to their environment.

There must be some other area in Placer County that has a town with infrastructure and services that can accommodate low income housing rather than Granite Bay.

Ann Kiliany
7495 Red Bud Road
Granite Bay, CA 95746
(916)791-1217
amksono@yahoo.com

Sent from Yahoo Mail for iPad

LETTER 231: ANN KILIANY

Response to Comment 231-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Impact 5-2, the vegetation communities within the rezone sites provide suitable nesting habitat to accommodate nesting songbirds and raptors protected under the MBTA and CFGC, such as the great horned owl, red hawk, and eagles. Mitigation Measures 5-2(ab) and 5-2(ac) contain various provisions to ensure that potential impacts to nesting birds and raptors protected under the MBTA and CFGC are reduced to a less-than-significant level, including preconstruction surveys of rezone sites not within the PCCP area. In addition, please see Response to Comment 163-20.

As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 232

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Granite Bay low income housing project proposal.
Date: Tuesday, February 20, 2024 9:38:30 AM

-----Original Message-----
From: Karl Kiliany <karl_kiliany@sbcglobal.net>
Sent: Tuesday, February 20, 2024 6:28 AM
To: Suzanne Jones <SuzanneJones@placer.ca.gov>
Cc: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Granite Bay low income housing project proposal.

232-1

Suzanne Jones,
It has come to my attention that there is a 500+ unit proposal for low income housing next Cavitt Junior High. Although I am sure it is well intended, this location does not have the infrastructure or Social Services to support this type of project. It would not only be doing a disservice to the current residents, it would not provide the support needed for the future residents. This project would be far more effective in helping its intended constituancy in a more urban location.

Please let me know your position and the direction intended of the board prior to 3/5/24 so I can make a informed decision.

Karl Kiliany
7495 Red Bud Road
Granite Bay, CA

LETTER 232: KARL KILIANY

Response to Comment 232-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project (attached as Appendix A to the Draft EIR), the existing infrastructure that is located within the vicinity of each rezone site is included in the Site Inventory Forms prepared for the proposed project (attached as Appendix C to the Draft EIR). As presented therein, existing water and sewer infrastructure is generally located in the immediate vicinity of the rezone sites. Such infrastructure would be used to provide water and sewer service to future development on the rezone sites. As such, the proposed project would not require major relocation or expansion of any water and sewer service infrastructure, the construction of which could cause significant environmental effects.

Letter 233

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Granite Bay Low Income Housing Rezone
Date: Tuesday, February 20, 2024 9:38:25 AM

From: A Kiliany <amksono@yahoo.com>
Sent: Tuesday, February 20, 2024 3:33 AM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>
Subject: Granite Bay Low Income Housing Rezone

To whom it may concern,

233-1

I absolutely oppose the consideration of rezoning the property next to Cavitt Jr. High to allow 510 units of housing of any kind let alone low income housing. This area does not have the infrastructure to support this many units nor can Auburn Folsom Road handle the increase of traffic with the addition of 510 to 1020 automobiles from this complex. Auburn Folsom Road and Douglas Boulevard are already overwhelmed with traffic and have become more of a freeway than a county back road. I believe that the needs of the people that would be living in this low income housing are also being ignored. Granite Bay is an area, not a town, and does not provide the services, jobs and public transportation usually required for low income residents to thrive.

Having been born and raised not far from this property in question, I have seen much change and development in the Granite Bay Area. What was once was a beautiful quiet countryside place to live has now become an overpopulated noisy suburb with increased crime. All the charm that had drawn people to want to live in this area is slowly being destroyed by too much development and will soon lead this beautiful area to its downfall.

There must be some other area in Placer County that has a town with infrastructure and services that can accommodate low income housing rather than Granite Bay.

Ann Kiliany
7495 Red Bud Road
Granite Bay, CA 95746
(916)791-1217
amksono@yahoo.com

Sent from Yahoo Mail for iPad

LETTER 233: ANN KILIANY

Response to Comment 233-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 234

From: Dianah Kalibbala
To: Placer County Environmental Coordination Services
Subject: Concerns regarding proposed rezoning plans near me
Date: Monday, March 18, 2024 2:27:09 PM

Good afternoon Placer County CDRA,

I hope this message finds you well. Am a homeowner living at 9001 Cairn St in Granite Bay at the Carnelian at Granite Bay homes located on Eureka and Auburn Folsom Boulevard. I am not against low to very-low income housing however, I don't this location would be suitable for it. I am therefore strongly opposed to the rezoning of the property that is close to my home, due to several factors including extremely tight traffic conditions in this area, not to mention nearby schools that cause a significant amount of traffic during the school year. I am concerned that locating so many homes close to this intersection would result in an overwhelming amount of traffic and congestion. This would also pose as a safety hazard for the students that are attempting to get to school via walking or biking, and also those trying to get to bus stops that are along Eureka Road. Unfortunately, there is really no option to widen the roads in this area because there is the state park right across the street.

234-1

In addition, this area is very near folsom lake, and there is a big worry about the environmental impact that the proposed rezoning could have in significantly altering the natural landscape, potentially harming local flora and fauna around the folsom lake. This impact on biodiversity, water resources, and air quality will heavily impact our community's environmental health.

We are also concerned about the risk that rezoning will pose to the unique character of this area as this development would be out of sync with the surrounding area. This would negatively affect property values, particularly if it results in increased noise, traffic, or other undesirable changes.

This has been a big discussion topic for my neighbors in this community and we are all opposed to this change. We would definitely appreciate reconsideration of this proposal.

Thank you!

Kind Regards,

Dianah Kalibbala

LETTER 234: DIANAH KALIBBALA

Response to Comment 234-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety. In addition, please see Responses to Comments 52-2, 163-4, 163-14, 163-15, and 163-20.

Letter 235

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:07:36 AM

From: Courtney Kimmel <courtneedean@gmail.com>
Sent: Friday, March 8, 2024 12:24 PM
To: jess.negrete@hcd.ca.gov; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

235-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a

235-1 cont.

Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Best,

Courtney Kimmel, RN

LETTER 235: COURTNEY KIMMEL

Response to Comment 235-1

Please see Responses to Comment Letter 62.

Letter 236

From: Ekaterina Kutsenko
To: Placer County Environmental Coordination Services
Subject: PLEASE TAKE OFF THE LIST 8989 Auburn Folsom rd - project 26
Date: Thursday, March 7, 2024 2:38:59 PM

Dear planning committee,

Please take off the list for re-zoning 8989 Auburn Folsom rd.

236-1 I'm living right next to it. This area is a habitat for wild life that will be destroyed.
There is already bad traffic on that corner and dangerous for kids to cross.
It's is a wrong place for the big apartment complex.

Please take it off the list.

Thank you,
Katerina Kutsenko

LETTER 236: KATERINA KUTSENKO

Response to Comment 236-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, and Response to Comment 52-2.

Letter 237

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Proposed Map Site 74
Date: Tuesday, February 20, 2024 9:16:54 AM

-----Original Message-----
From: kathleen kincheloe <katemkinch@yahoo.com>
Sent: Saturday, February 10, 2024 5:33 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Proposed Map Site 74

237-1 I live on Pacer Place off of New Airport in Auburn and am very upset about the low income housing that is proposed for my neighborhood. That will bring more crime and drugs into the community which we definitely don't need. Also, added traffic on New Airport will be hazardous for this area. Many people walk and ride their bikes in that area including children. The impacts will go well beyond this area and will impact much of northern Auburn. It will also lower property values and the desirability to live in northern Auburn for years to come. Please do not allow this development to go forward. Sincerely, Kathleen Kincheloe

Sent from my iPhone

LETTER 237: KATHLEEN KINCHELOE

Response to Comment 237-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety.

Letter 238

From: knopp@surewest.net
To: Placer County Environmental Coordination Services
Subject: high density housing off old auburn and hazel
Date: Thursday, March 14, 2024 5:08:54 PM

238-1 we live in castle creek subdivision. There is a daycare/school and elementary school within a few blocks of this area. there are two new assisted living complexes with in a couple blocks, people speed on old auburn road and the traffic is heavy and fast. We have asked for a cross walk because of kids going to bus stop and schools and were rejected. Adding more houses, especially high density, is dangerous for us, and pedestrians, school kids, old folks from the assisted living.

LETTER 238: KNOPP

Response to Comment 238-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Letter 239

From: T. Knutsen
To: Board Clerk
Cc: Kally Kedinger-Cecil; Supervisor Gore; Placer County Environmental Coordination Services
Subject: East/Central & Baseline/East Rezoning Program – Supervisorial District 1
Date: Thursday, February 22, 2024 8:49:58 AM

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr, Ste 190
Auburn, CA 95603

February 21, 2024

Subject: East/Central & Baseline/East Rezoning Program – Supervisorial District 1

Dear Placer County Community Development Resource Agency,

I am writing to express the concerns, regarding the rezoning program for Supervisorial District 1. Specifically, the four properties on East/Central & Baseline/East. My family has lived in this neighborhood for ten years. We moved here to enjoy the rural life and moved from within the city limits of Roseville where our neighbors were 10 feet from our windows and into our daily business. This area of "unincorporated Placer County" is a pocket of paradise filled with ranchers and farmers that are here to live the life of space filled with livestock and freedom from incumbrances on the of compression by overpopulation and building. We all paid the prices to have these properties and enjoy peace and solitude of a country lane where we ride horses, families walk and bike down the road; drive tractors, have burn piles, and ride motorcycles on our property.

239-1

Our concerns of adding high density housing to our secluded small, rural area include, emergency service support, transportation services, reserve and wildlife preservation, traffic, impact on existing schools, decreased property values and safety concerns. Additionally, this zone change is not consistent with the area. We have large acreage parcels, with livestock. We have moved to this location to feel rural and experience the country lifestyle. All these properties rely on individual water wells and the additions on high density housing would affect the water aquafer that we all pull from. Where would the water come from for these homes and where would septic also go as each home has individual septic systems. The roadway is narrow, does not have sidewalks and cannot support additional heavy traffic of city buses and heavy trucks to service the area.

I am respectfully requesting that these properties to remain zoned as-is. If the owners' whish to split the properties into smaller lots, then please limits lot sizes to no less than .75 of an acre as written into the zoning of this area for small agricultural farm.
As an option if the county must utilize these properties because of "underutilization" please consider a solar farm. This could be a benefit to the infrastructure of the county. A solar farm would continue to preserve the wildlife habitat, not devalue property, keep this rural area as is and not aesthetically change our neighborhood.

Thank you for your time.

Sincerely,

Trina Knutsen (2073 Central Ave Roseville, CA 95747)

Cc: Board of Supervisors boardclerk@placer.ca.gov
Project Planner, Kally Kedinger- Cecil kkedinge@placer.ca.gov
Supervisor, Bonnie Gore supervisorgore@placer.ca.gov
Draft Environmental Impact Report cdraecs@placer.ca.gov

LETTER 239: TRINA KNUTSEN

Response to Comment 239-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, Master Response 4 – Traffic Safety, and Master Response 6 – Impacts to Local Schools.

The commenter expresses concerns about the project's potential effect to the aquifer. As stated in the Initial Study (Appendix A to the Draft EIR), any residential development within the western County would be required to connect to public water, which is not sourced from groundwater. Thus, the proposed project would have no adverse effect on existing wells.

Letter 240

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:08:03 AM

From: Anonymous <rkurtz60@gmail.com>
Sent: Friday, March 8, 2024 12:54 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff:

240-1

As a new resident in Morgan Ranch, I am writing to express four of the top concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1. I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential lawsuits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2. The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues). The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

3. The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city -- not a county where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4. This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the

240-1 cont.

various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Thank you for your sincere consideration,
Rhonda Kurtz
10155 Evening Star Ct.
Roseville, CA 95747

LETTER 240: RHONDA KURTZ

Response to Comment 240-1

Please see Responses to Comment Letter 62.

Letter 241

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element Program 1 Rezone
Date: Tuesday, March 5, 2024 11:56:42 AM

From: Brian Larsen <larsenchiropractic@att.net>
Sent: Tuesday, March 5, 2024 11:56 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Housing Element Program 1 Rezone

To the Planning Commission,

241-1

I am writing to express my concerns about the proposed construction of homeless housing across from the local school. Having recently moved from an area where a significant homeless population resided, I have firsthand experience with the challenges that can arise in such environments. My previous neighborhood faced numerous issues, including frequent drug abuse and altercations, some occurring disturbingly close to residential buildings.

While I fully support the need to provide shelter and assistance to those experiencing homelessness, I am worried that situating such housing directly opposite a school may not be in the best interest of the students or the wider community. The presence of a vulnerable population with complex needs requires careful consideration and planning to ensure that any negative impacts are minimized. My experiences have shown me that such facilities can inadvertently contribute to safety and security concerns without adequate support services and management.

So, I would like to ask the Planning Commission to reconsider the proposed location for this project. We must balance helping those in need and maintaining a safe, conducive environment for our children's education and well-being. Alternative sites, possibly farther from sensitive areas such as schools, coupled with a robust support and integration services plan, might offer a more suitable solution.

With thoughtful planning and community involvement, we can achieve a compassionate response to homelessness that also respects the needs and concerns of all community members.

Thank you for considering my perspective on this critical issue.

Sincerely,

Brian Larsen

212 Lincoln Way

Auburn CA 95603

530-885-4447

LETTER 241: BRIAN LARSEN

Response to Comment 241-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 242

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: URGENT -Attention Princeton Club Homeowners
Date: Tuesday, February 20, 2024 9:14:15 AM

From: Allan L Lashbrook <lashbrook4@aol.com>
Sent: Thursday, February 8, 2024 12:27 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: URGENT -Attention Princeton Club Homeowners

Kally

I thought I sent this to you last month and it was not included with supporting documentation sent out today for meeting on the 13th. This clearly documents residents in our HOA opposition to Site 74. Can you provide this as addendum for the information you sent out today.

Thank You

Allan Lashbrook
(530) 320-3055

----- Forwarded Message -----
From: Princeton Estates <princetonestates1@gmail.com>
To: Ann /Bruce Hein /Nagle <annmariehein@gmail.com>
Sent: Thursday, January 11, 2024 at 05:23:07 PM PST
Subject: FW: URGENT -Attention Princeton Club Homeowners

242-1

Below is an issue the PCE Board has agreed to make you all aware of. The specific views and words are those of resident Allan Lashbrook

URGENT -Attention Princeton Club Homeowners

January 10, 2014

On November 23, 2023 the Princeton Club HOA Board sent all of us the following notice that none of us were aware of! It was only discovered when I happened to check the status of the Housing Element Program HE-1, Rezone to Meet the Regional Housing Needs Allocation (RHNA). They conveniently scheduled the meeting on Monday morning following Thanksgiving weekend, when people would be away. Then they made their official Option 1 (including Site 74) recommendation that is documented in the attached November 28, 2023 article in the Auburn Journal '***Placer rezone program to move forward without unwilling property owners Gold Country Media'.*** Some of us have tried to give our input, but it was

obviously ignored because we are not the actual property owners selected. Option 1 includes Site74, which is the property on Bell Road near the Auburn Presbyterian Church at the corner of New Airport Road, less than ¼ mile from our HOA entrance on Bill Francis Road.

When I attended the Placer Rezoning 'town hall' meeting on August 8, 2023 this sixteen (16) acre site (Property Map Site 74 052-171-005-000) was not even discussed. At that meeting I specifically asked if their designation of 'very low income' included the 'Homeless' and they said "YES". Site 74 will include 316 units, which means there will be more 'very low income' people living just 1/4 mile away then live here in Princeton Club! They need a better support structure and we (Princeton Club HOA) need to feel safe and not have our homes lose value here in our beautiful rural country environment!

Also, at the August town hall meeting Penryn was one of the sites selected and they said they should be removed (see their reasons in attached article). At the November meeting the Rezoning staff said they had dropped Penryn because of negative feedback from the residents in the area and that the actual selected property owners were 'unwilling participant'. We in Princeton Club HOA have very similar issues/reasons, including more than doubling our population with 'very low income' units less than ¼ mile from our entrance. If that happens our HOA will never be the same, and not for the better. Because we are not the property owner they never even asked, let alone considered our opinion. Just imagine what it would be like!

242-1 cont.

Please note that in the Auburn Journal article they plan to have the draft environmental impact report (EIR) being completed at the end of January 2024 and the final EIR slated to be complete in April 2024. Then it will be a **Done Deal**!

It is ***URGENT*** for us to collectively respond that ***'Site 74 should be removed'*** from their recommendation this month, just like Penryn was for the same reasons as impacted residents! If you agree, please call or email the Placer Rezoning Program staff. My contact with the Placer Rezoning Program staff is Kally Kedinger-Cecil at(530)745-3034, kkedinge@placer.ca.gov, and cdraecs@placer.ca.gov

Please share this information with your neighbors to ensure we are all informed.

Thank You

Ingrid and Allan Lashbrook

Cell (530) 320-3055

Placer rezone program to move forward without unwilling property owners

Stacey Adams

Auburn Journal

Nov 28, 2023 10:00 AM

The Placer County Board of Supervisors on Monday directed county staff to remove properties of owners unwilling to participate in the rezone program from the candidate list.

The Housing Element Implementation Program HE-1: Rezone to Meet the RHNA (Regional Housing Needs Allocation) involved planning staff assessing the viability of candidate sites in the county that have the potential to be rezoned to accommodate a shortfall for Placer's capacity in lower-income households. State law requires Placer to rezone sufficient sites to accommodate its allotment of 1,257 units by May 15, 2024. The state also recommends an additional buffer of 15-30 percent.

Placer County Planning Director Chris Pahule confirmed non-compliance could result in the Department of Housing & Community Development revoking Placer's certification of its Housing Element, which could result in revocation of its pro-housing designation, legal action from the state and loss of land-use and permitting authority.

242-1 cont.

The project's candidate list comprises 74 properties throughout unincorporated areas of the county, totaling 250.1 acres. The sites are located in the communities of North Auburn, Dry Creek, Bowman, Penryn, Newcastle, Granite Bay, Sheridan and Applegate, as well as within the Lake Tahoe region.

Kally Kedinger-Cecil, a senior planner for Placer County, presented three options for identifying which properties should be included in the rezoning:

- Option 1 includes 35 sites totaling 159.7 acres, which would result in 3,196 units at 20 dwelling units per acre (a 54-percent buffer). This option includes sites within each of Placer's districts and exclusively consists of property owners willing to participate in the program.
- Option 2 includes 28 sites totaling 109.7 acres, which would result in 2,196 units (a 20-percent buffer). This option has sites in all districts and consists of properties with verified participants who received a score of 80 or better.
- Option 3 includes 34 properties totaling 115.6 acres, which would result in 2,312 units (a 31-percent buffer). This option includes property owners who have expressed opposition to participating in the rezone program and properties with active development applications. Option 3 also does not have any properties within District 2.

Kedinger-Cecil confirmed staff recommended the first option due to it having verified participants and the robust buffer, which would allow Placer to comply with no-net loss policies.

"The larger buffer we have, the more room we have for making those determinations and being able to demonstrate to the state that if any of these sites are developed

with a non-residential or a market-rate residential project, that there is still a no-net loss of units," Kedinger-Cecil said.

The board accepted public comment for close to two hours with 37 commenters noting concerns, including impacts to nearby services and schools due to the influx of individuals and vehicles a high-density development would bring, lack of services near potential sites (such as the Penryn Parkway), property values diminishing due to high-density developments, changing the rural nature of eastern Placer communities and the possibility that Penryn's population would be tripled with the proposed candidate sites.

"My big issue is that the concentration of these is in the North Auburn area. Talk about equitable; this is not equitable," Auburn resident Wayne Nader said. "The burden is very heavily given to North Auburn. If you look at any one of the options, District 5 is heavily burdened with, especially in North Auburn, with the most units and the infrastructure does not support it here. (Highway) 49 is already a challenge so I just don't see how we can go forward without having some pretty negative implications to Highway 49 and the general Auburn area."

Penryn resident Muriel Davis noted Penryn has no nearby jobs, shopping or transit and added, "The rural areas like Penryn should not be unfairly burdened with these high-density affordable housing units. Penryn cannot handle the impact to already crowded schools, to our fire department and two-lane roads and the I-80 interchange. … Locations of high-density housing should not be double or triple the population of a community and should not severely harm the safety and peacefulness of the community."

242-1 cont.

Commenters also questioned why units could not be put in areas of Roseville and Rocklin where there is already high-density development, county-owned properties were not included on the candidate list for potential rezone, prior developers were not required to include low-income housing in their projects as well as a lack in notifying the communities about the rezone program.

Pahule confirmed city jurisdictions also have RHNA obligations they have to meet so the county cannot put its RHNA number into incorporated cities. Pahule also confirmed there are more than 400 units proposed at the Placer County Government Center in North Auburn, and additional county-owned sites that were evaluated were not included in the Housing Element for various reasons, including being too small and having no access to utilities.

The supervisors noted wanting to meet the mandate with a smaller buffer than the 54 percent proposed in Option 1 and asked staff to look into incentivizing accessory dwelling units and smaller projects like developments with 20-40 units. Following deliberation, the board directed staff to remove properties with unwilling participants.

Board Chair and District 3 Supervisor Jim Holmes also requested the property sites 21 and 22 in Penryn, Blitz Lane and Florence Road also be removed. Pahule confirmed property owners on Blitz Lane and Florence Road are willing participants. Holmes directed staff to work with the communities near those properties to

242-1 cont.

understand their concerns.

Pahule noted staff would want to return to the board in the coming months before returning with a finalized plan.

According to Kedinger-Cecil, next steps in the process include notification signage being posted at candidate sites, updates being provided to the Municipal Advisory Councils, the draft environmental impact report (EIR) being completed at the end of January 2024 and the final EIR slated to be complete in April 2024.

Placer residents can find more information regarding the rezone program at placer.ca.gov/8794/Housing-needs-rezone-program. Pahule confirmed Monday's presentation and reference materials will also be accessible on the rezone program website

LETTER 242: ALLAN LASHBROOK

Response to Comment 242-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 243

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

February 11, 2024

Dear Placer County Community Development Resource Agency,

I received a letter regarding the rezoning program for supervisorial District 1. I live directly across the street from 4 of the properties being considered. My family has lived at 2050 Central Ave in Roseville for almost 31 years. We worked hard our whole lives to own this property in this rural neighborhood. We love it here because it is a small peaceful country area with livestock, wildlife, trees and open spaces. Many of the residents in this area are multi-generational owners of their property. We have an abundance of wildlife that visits our property including deer, fox, raccoon, possum, skunk, squirrel, coyote and more. Our neighbors have cattle, chickens, goats & horses.

243-1

Rezoning this area for Residential Multifamily 30 (RM30) will destroy our quality of life.

I can't even imagine the impact of adding up to 881 units of housing to the traffic, schools, emergency services, air quality and noise to this quiet community.

Please do not rezone this area.

Sincerely,

Tiffany & Anthony J Latino Jr
2050 Central Ave
Roseville, CA 95747
916-799-3126
tiffanylatino@comcast.net

Sharon Garsee
8180 East Drive
Roseville, CA 95747
916-215-0891
sgarsee@aol.com

LETTER 243: TIFFANY AND ANTHONY J LATINO JR., AND SHARON GARSEE

Response to Comment 243-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 244

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

February 11, 2024

Dear Placer County Community Development Resource Agency,

244-1

I received a letter regarding the rezoning program for supervisorial District 1. I live directly across the street from 4 of the properties being considered. My family has lived at 2050 Central Ave in Roseville for almost 31 years. We worked hard our whole lives to own this property in this rural neighborhood. We love it here because it is a small peaceful country area with livestock, wildlife, trees and open spaces. Many of the residents in this area are multi-generational owners of their property. We have an abundance of wildlife that visits our property including deer, fox, raccoon, possum, skunk, squirrel, coyote and more. Our neighbors have cattle, chickens, goats & horses.

Rezoning this area for Residential Multifamily 30 (RM30) will destroy our quality of life.

I can't even imagine the impact of adding up to 881 units of housing to the traffic, schools, emergency services, air quality and noise to this quiet community.

Please do not rezone this area.

Sincerely,

Tiffany & Anthony J Latino Jr
2050 Central Ave
Roseville, CA 95747
916-799-3126
tiffanylatino@comcast.net

Sharon Garsee
8180 East Drive
Roseville, CA 95747
916-215-0891
sgarsee@aol.com

LETTER 244: TIFFANY AND ANTHONY J LATINO JR., AND SHARON GARSEE

Response to Comment 244-1

Please see Response to Comment 243-1.

Letter 245

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:33:09 AM

From: Jerry Lawson <jerrychesters@gmail.com>
Sent: Saturday, March 9, 2024 7:20 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

245-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to

245-1 cont.

find more appropriate properties that will serve the current and future residents of Placer County appropriately.



All reactions:
1212

LETTER 245: JERRY LAWSON

Response to Comment 245-1

Please see Responses to Comment Letter 62.

Letter 246

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30
Date: Tuesday, March 19, 2024 10:55:51 AM
Attachments: Outlook-pbvykrwt.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:05 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Amy Lee <amylee224@yahoo.com>
Sent: Friday, March 1, 2024 2:01 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

246-1

>
> Dear Members of the Planning Department,
>
> I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per

acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:
>
> 1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.
>
> 2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.
>
> 3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.
>
> 4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.
>
> 5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.
>
> I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.
>
> I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning.
>
> Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.
>
> Sincerely,
Amy Lee
3190 Silky Oak Dr
Roseville, Ca 95747

246-1 cont.

>
>
> Sent from my iPhone

LETTER 246: AMY LEE

Response to Comment 246-1

Please see Responses to Comment Letter 115.

Letter 247

From: Micki Lemke
To: Placer County Environmental Coordination Services
Subject: Low income rezone @ Graeagle Lane and Dry Creek, Auburn
Date: Tuesday, February 20, 2024 5:51:43 PM

Hello,

I'm unable to attend the meeting on 2/22 . I work the night shift and sleep during the day. I'm writing to you in opposition to the rezoning in the North Auburn area. My home is located right next to one of the rezoning areas off of Hwy 49 behind Bedrosian's Tile. Currently there are apartments, light industry, and the businesses around the Arco station. I bought my home in 2007 and I have watched Auburn increase their crime rates, harassment by transients at the stores or parking lots, graffiti on the fences, trash and shopping carts left all over the town, an influx of transients living on the street instead of designated homeless housing, impaction at the small local hospital, increased traffic and accidents on 49 and around town, increased drug use, increased DUIs, and an increased burden on our LEOs. Auburn isn't set up for more people and the main reason people have moved to this area is to live far from the city life such as Rocklin and Roseville. I have worked hard to upgrade my home so that I can sell at a decent price when I retire in 2028. I do not want a substandard price for my home because I live near low income housing or have a problem in selling my home. I also, don't want the trouble that comes with low income housing, "The Greens" isn't low income housing, but it is the cheapest place to rent in Auburn and LEOs are over there frequently with trouble happening. The Mercy Housing off of Bell is low income and it is my understanding that LEOs frequent that housing development and the insides of the apartments are already trashed. We don't have enough doctors or dentists in the area accepting new patients. Placer Co does not have enough MediCal providers in Auburn either. There will be strain on the water, power, and sewer facilities. I'm opposed to this rezoning in North Auburn and by the Bowman school area.

247-1

Thank you,

Margaret Lemke
11712 Graeagle Lane Auburn 95602

The first picture is looking up from the Graeagle Cul De Sac. I live on the East side , two homes down from mailbox so my view will be looking at condensed housing. Second picture is looking down our Cul De Sac, we are all one story homes and bought on this cul de sac for peace and quiet. Third picture is looking down as you head toward Richardson Drive. Fourth picture is a closer view of where these units are planned to be built and there is zero privacy for us on Graeagle Ln and Sherwood Dr. Fifth picture is of the light industrial building that are only one story. Sixth picture is of our Emergency Access Road that lies along between Bedrosians Tile and the house at the end of the street. Seventh picture is more of the light industrial buildings that are one story.

As I have said in my other 3 emails to the BOS and Kally, I'm opposed to this low

income housing in this small area. 93 units if you use the max of 30 units per acre and where are they going to enter and exit? Where are they going to park? If they do not have transportation, they are not within walking distance of grocery, medical, dental, hardware, or dept stores. We do not have sidewalks from Dry Creek to Quartz Dr (Greens). The traffic flow on 49 is faster than the 55 mph posted. We have many accidents at the Dry Creek and 49 intersection. We recently had a power outage that affected our neighborhood and the apartments due to a tree that fell into a power-line on the Emergency Road Access. We were out of power for 26 hours. Where will the kids go to school or how will they get there? I have not seen a bus in my neighborhood this school year.

If you plan to build here then I feel you should only build a one story unit since the surrounding area homes are one story a well as the light industrial buildings.

Thank you, Micki Lemke
11712 Graeagle Lane, Auburn



247-1 cont.

247-1
Cont.





247-1 cont.







247-1
cont.



Sent from Micki's iPhone

LETTER 247: MARGARET LEMKE AND MICKI LEMKE

Response to Comment 247-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety. With respect to concerns about private views, while these public concerns are important to the County, they are not CEQA concerns. As discussed on page 20 of the Initial Study (Appendix A to the Draft EIR),

> Distinguishing between public and private views is important when evaluating changes to visual character or quality, because private views are views seen from privately-owned land and are typically associated with individual viewers, including views from private residences. Public views are experienced by the collective public and include views of significant landscape features and along scenic roads. According to CEQA (PRC, § 21000 et seq.) case law, only public views, not private views, are protected under CEQA. For example, in *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720 [3 Cal. Rptr.2d 488], the court determined that "we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. As recognized by the court in *Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal.App.3d 188 [129 Cal.Rptr. 739]: '[A]ll government activity has some direct or indirect adverse effect on some persons. The issue is not whether [the project] will adversely affect particular persons but whether [the project] will adversely affect the environment of persons in general.'" Therefore, it is appropriate to focus the aesthetic impact analysis on potential impacts to public views.

Notwithstanding, the comments have been forwarded to the decision-makers for their consideration.

Letter 248

From: Micki Lemke
To: Board Clerk; Kally Kedinger-Cecil; Placer County Environmental Coordination Services
Subject: Rezoning opposition
Date: Thursday, March 7, 2024 3:21:36 PM

>
>
>>
>> Hello,
>>
>> I'm unable to attend any of the meetings because I work the night shift and sleep during the day. I'm writing to you in opposition to the rezoning in the North Auburn area. My home is located right next to one of the rezoning areas off of Hwy 49 behind Bedrosian's Tile (Graeagle). Currently there are apartments, light industry, and the businesses around the Arco station. I bought my home in 2007 and I have watched Auburn increase their crime rates, harassment by transients at the stores or parking lots, graffiti on the fences, trash and shopping carts left all over the town, an influx of transients living on the street instead of designated homeless housing, impaction at the small local hospital, increased traffic and accidents on 49 and around town, increased drug use, increased DUIs, and an increased burden on our LEOs. Auburn isn't set up for more people and the main reason people have moved to this area is to live far from the city life such as Rocklin and Roseville. I have worked hard to buy and maintain my home. I do not appreciate the lack of privacy this will cause looking into the cul de sac. I do not want the trouble or noise that comes with low income housing, "The Greens" isn't low income housing, but it is the cheapest place to rent in Auburn and LEOs are over there frequently with trouble happening. The Mercy Housing off of Bell is low income and it is my understanding that LEOs frequent that housing development and the insides of the apartments are already trashed. We don't have enough doctors or dentists in the area accepting new patients. SAFH is limited with bed capacity and staffing. Placer Co does not have enough MediCal providers in Auburn either. There will be strain on the water, power, and sewer facilities. I do not want my taxes increased because I'm forced to fund these projects. I have sent pictures of the site and my cul de sac in previous emails. I'm opposed to this rezoning in North Auburn.
>>
>> Thank you,
>>
>> Margaret Lemke
>> 11712 Graeagle Lane Auburn 95602

248-1

LETTER 248: MARGARET LEMKE

Response to Comment 248-1

Please see Response to Comment 247-1.

Letter 249

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Pictures of the Graeagle Low Income Housing Plan 3.1 acres
Date: Tuesday, February 20, 2024 9:38:13 AM

From: Micki Lemke <mickilemke@att.net>
Sent: Sunday, February 18, 2024 9:50 AM
To: Board of Supervisors Supervisors <bos@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Megan Wood <MWood@placer.ca.gov>
Subject: Pictures of the Graeagle Low Income Housing Plan 3.1 acres

Hello,

The first picture is looking up from the Graeagle Cul De Sac. I live on the East side , two homes down from mailbox so my view will be looking at condensed housing. Second picture is looking down our Cul De Sac, we are all one story homes and bought on this cul de sac for peace and quiet. Third picture is looking down as you head toward Richardson Drive. Fourth picture is a closer view of where these units are planned to be built and there is zero privacy for us on Graeagle Ln and Sherwood Dr. Fifth picture is of the light industrial building that are only one story. Sixth picture is of our Emergency Access Road that lies along between Bedrosians Tile and the house at the end of the street. Seventh picture is more of the light industrial buildings that are one story.

249-1

As I have said in my other 3 emails, I'm opposed to this low income housing in this small area. 93 units if you use the max of 30 units per acre and where are they going to enter and exit? Where are they going to park? If they do not have transportation, they are not within walking distance of grocery, medical, dental, hardware, or dept stores. We do not have sidewalks from Dry Creek to Quartz Dr (Greens). The traffic flow on 49 is faster than the 55 mph posted. We have many accidents at the Dry Creek and 49 intersection. We recently had a power outage that affected our neighborhood and the apartments due to a tree that fell into a power-line on the Emergency Road Access. We were out of power for 26 hours. Where will the kids go to school or how will they get there? I have not seen a bus in my neighborhood this school year. I'm not going to restate all my concerns from the other 3 emails since you should have those as record.

If you plan to build here then I feel you should only build a one story unit since the surrounding area homes are one story a well as the light industrial buildings.

Thank you, Micki Lemke

11712 Graeagle Lane, Auburn

P.S. I would like this also sent to Cindy Gustafson since she is District 5.

249-1
cont.





249-1
cont







249-1
cont.





Sent from Micki's iPhone

LETTER 249: MICKI LEMKE

Response to Comment 249-1

Please see Response to Comment 247-1.

Letter 250

From: Micki Lemke
To: Board of Supervisors Supervisors; Kally Kedinger-Cecil; Placer County Environmental Coordination Services
Subject: Rezoning opposition
Date: Thursday, February 8, 2024 5:57:14 PM

>
> Hello,
>
> I'm unable to attend the meeting on 2/13 or 2/22 . I work the night shift and sleep during the day. I'm writing to you in opposition to the rezoning in the North Auburn area. My home is located right next to one of the rezoning areas off of Hwy 49 behind Bedrosian's Tile. Currently there are apartments, light industry, and the businesses around the Arco station. I bought my home in 2007 and I have watched Auburn increase their crime rates, harassment by transients at the stores or parking lots, graffiti on the fences, trash and shopping carts left all over the town, an influx of transients living on the street instead of designated homeless housing, impaction at the small local hospital, increased traffic and accidents on 49 and around town, increased drug use, increased DUIs, and an increased burden on our LEOs. Auburn isn't set up for more people and the main reason people have moved to this area is to live far from the city life such as Rocklin and Roseville. I have worked hard to upgrade my home so that I can sell at a decent price when I retire in 2028. I do not want a substandard price for my home because I live near low income housing or have a problem in selling my home. I also, don't want the trouble that comes with low income housing, "The Greens" isn't low income housing, but it is the cheapest place to rent in Auburn and LEOs are over there frequently with trouble happening. The Mercy Housing off of Bell is low income and it is my understanding that LEOs frequent that housing development and the insides of the apartments are already trashed. We don't have enough doctors or dentists in the area accepting new patients. Placer Co does not have enough MediCal providers in Auburn either. There will be strain on the water, power, and sewer facilities. I'm opposed to this rezoning in North Auburn and by the Bowman school area.
>
> Thank you,
>
> Margaret Lemke
> 11712 Graeagle Lane Auburn 95602

250-1

LETTER 250: MARGARET LEMKE

Response to Comment 250-1

Please see Response to Comment 247-1.

Letter 251

From: Shelby Leni
To: Placer County Environmental Coordination Services
Subject: 8989 Auburn Folsom Rd, Project 26 – Do Not Develop.
Date: Thursday, March 7, 2024 10:40:58 AM

251-1 As a nearby resident, I cannot describe to you the impact that this will have on the area. It is very frustrating that this was such a surprise and was dropped on the community so suddenly. While I understand the need for this type of housing, this IS NOT the property to do it on. The impact to the area and wildlife would be too substantial. C'mon.

--
Shelby Leni

LETTER 251: SHELBY LENI

Response to Comment 251-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Chapter 5, Biological Resources, of the Draft EIR, with incorporation of the mitigation measures contained therein, all potential impacts related to biological resources would be reduced to a less-than-significant level. Please also see Response to Comment 52-2.

Letter 252

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to rezoning sites 71 & 72
Date: Thursday, March 7, 2024 10:00:14 AM

-----Original Message-----
From: Linda Lessner <llessner6@gmail.com>
Sent: Wednesday, March 6, 2024 6:59 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Opposition to rezoning sites 71 & 72

Dear Ms. Kedinge,
I am writing to voice our opposition to the rezoning or sites 71 and 72 off Lincoln way.

252-1

Transforming this beautiful wooded area into a congested housing development would be a travesty to our neighborhood. It would bring more traffic than the area can handle and impose dangers to the students attending the Blue Door Community school. And, to those of us that walk our children and dogs in this neighborhood we don't want our quiet neighborhood filled with cars speeding through our streets.

This area is the Auburn State Recreation Area, NOT the Auburn mass housing area! There are plenty of areas to build. Why destroy the beauty of our area?

This is extremely short-sited and money driven. The constituents are watching.

Sincerely,
Linda and Mike Lessner
182 Oak Street

LETTER 252: LINDA AND MIKE LESSNER

Response to Comment 252-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, Master Response 4 – Traffic Safety, and Responses to Comment Letter 174.

Letter 253

From: David Lewis
To: Placer County Environmental Coordination Services
Subject: Property 26
Date: Friday, March 8, 2024 6:48:23 AM

253-1

I am requesting that property 25, located at 8989 Auburn Folsom Rd. not be granted rezoning for apartments! The impact to the roads and traffic will overwhelm the area! The close proximity to Cavitt Jr. High is also a concern. A proper and complete EIR must be done if this becomes a consideration. This area is a vital wildlife area and the impact on it by building housing would be devastating. Thanks-David Lewis, 7485 Red Bud Rd. Granite Bay

LETTER 253: DAVID LEWIS

Response to Comment 253-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. In addition, please see Responses to Comments 52-2, 163-4, 163-14, 163-15, and 163-20 related to biological resources on Rezone Site #26.

Letter 254

From: Jaime Lim
To: Placer County Environmental Coordination Services
Subject: I oppose the Draft EIR in regards to Dry Creek because it pools all the unincorporated areas together and does not specifically address the environment impact to Dry Creek.
Date: Saturday, March 16, 2024 10:34:09 AM

254-1 I oppose the Draft EIR in regards to Dry Creek because it pools all the unincorporated areas together and does not specifically address the environment impact to Dry Creek.

Jaime Lim
916-622-0713
jlim911@aol.com
Veteran of Foreign Wars - Lifetime Member
Senior Mentor - Placer County Superior Court
Veterans Treatment Court

photo.JPG



LETTER 254: JAIME LIM

Response to Comment 254-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The pooling referred to by the commenter is unclear, but please note that flooding is addressed in Section X, Hydrology and Water Quality, of the Initial Study (Appendix A of the Draft EIR). Please also see Responses to Comment 27-1 and 59-2.

Letter 255

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HOUSING SITES REZONE WORKSHOP - 2/13/2024
Date: Tuesday, February 20, 2024 9:19:08 AM

From: Pamela <pamelasno1@gmail.com>
Sent: Monday, February 12, 2024 4:28 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: FW: HOUSING SITES REZONE WORKSHOP - 2/13/2024

255-1

Good afternoon – I would like to amend my concerns regarding the Housing Sites Rezone project. I have revised my submission and am re-submitting this information. I am unable to email this to each of the Board of Supervisors and their Chiefs of Staff for their information prior to the meeting tomorrow.
I have read the draft EIR on the Housing Element Sites Rezone. I am particularly concerned with a proposed site off Canal Street (referred to in Table 4, #34, property 038-104-095-000 12.8 acres, undeveloped). A revised Table 4 was recently issued showing this property as "5 acres, vacant" – its actually a 12 undeveloped acre parcel. My property on Lowe Lane neighbors this Canal street property. It is undeveloped and home to wildlife, specifically birds of prey and their food sources, and coyotes.
Question: Have any members of the Committee visited these proposed sites?
Comment/Concern: Looking at property records delineating property/plot lines is only a small step at identifying sites that could be proposed; however, a site visit to these proposed sites provides:

1. a real time view of how the area around the proposed site has been developed or not been developed;
2. Identifies challenges of accessibility due to predeveloped areas around the proposed site (can construction equipment access the proposed site? Does existing infrastructure support accessing proposed site both during and after development?) ;
3. Identifies new infrastructure needed to support both during and after development (how does current infrastructure support accessibility both during and after development?);
4. Identifies negative impact on existing infrastructure;
5. Additional impact on first responders (fire, police); and,
6. Requirement of Water and Sewer infrastructure development.

Question: Has anyone contacted the owners of the businesses located on Canal Street and gathered their input?
Comment/Concern: These businesses will be negatively impacted if the Canal St. property is selected for development. Construction equipment will need to traverse through this convoluted

business area during project development and depending on the infrastructure needed to be in place prior to the construction of low-income housing, it may be a few years of business interruption.
Question: Have properties/sites within other cities/towns within Placer County that meet the median income or have better infrastructure in place been considered for the low-income development?
Comment/Concern: I think low-income housing should be placed within the cities of Placer County that better meet or sustain the median income or have better infrastructure currently in place. There is a lot of undeveloped land out Hwy 65 towards Lincoln and Wheatland. Auburn already houses individuals who could be considered low-income. Why burden Auburn with more? We do have existing income based housing apartment complexes (1 was recently completed behind Home Depot, 2 are located behind Chase Bank, 1 is located on Silverbend Way, and there are others although I do not know exactly where they are located). Maybe the Board of Supervisors/Planning Commission can require low-income or income-based housing units to be developed by the developers of the mega housing developments (i.e., Del Webb retirement communities. For example, in order for Del Webb to build another community they would also be responsible for either building low-income units or setting aside land for low-income units). It would be the same type of premise that for x number of houses built a playground or park is developed as well.
I understand that Placer County must provide low-income housing; however, I do not feel that the Canal Street property is a good fit to meet this mandate and should be removed from consideration. The area surrounding the entirety of the Canal Street property/site has been predeveloped and resulted in severely limited access to it. It is surrounded by small private lanes off Luther Road. Canal Street itself has been predeveloped with small businesses and there is no straight thoroughfare to traverse the area. There is no accessibility to the Canal St site from Hwy 49. Additionally a double canal system runs between Canal Street and the proposed site. I respectfully invite you to come for a site visit so that you can see the challenges faced for developing this proposed location.
I also feel that Placer County could meet the housing requirements by looking outside of Auburn to accomplish this.
On another note – the draft EIR made mention of additional EV charging stations at the developed low-income housing sites. Has anyone thought logically about this? If you are low-income, how do you afford to purchase an EV? Are there other sites (existing parking lots, etc) that could have EV charging stations installed?
Thank you for taking my comments/concerns into consideration.

Pamela Lindsay

255-1 cont.

LETTER 255: PAMELA LINDSAY

Response to Comment 255-1

Please see Master Response 1 – Non-EIR/Administrative Issues. It is also noted that because the proposed project does not include any site-specific development plans, designs, or proposals at this time, there are no proposed ingress/egress points for this site. All new developments that occur within the County would be required to comply with all applicable design standards as part of constructing or modifying the transportation system. For example, Policy 3.A.2 of the Placer County General Plan requires all streets and roads to be constructed in accordance with General Plan, community plan, and specific plan standards. The County also has adopted roadway and encroachment standards in the Placer County Land Development Manual. The manual was recently updated in 2023 to reflect current roadway and encroachment standards. At such time that a residential development application comes forward for Rezone Site #34, the County would review the design to ensure all points of ingress/egress, including emergency vehicle access, are provided in conformance with County standards to ensure no adverse effects to future occupants as well as existing residents.

Letter 256

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HOUSING SITES REZONE WORKSHOP - 2/13/2024
Date: Tuesday, February 20, 2024 9:24:39 AM
Attachments: Satelite View of Canal St site #34 enlarged.pdf
Satelite View of Canal St site #34.pdf

From: Pamela <pamelasno1@gmail.com>
Sent: Wednesday, February 14, 2024 1:29 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: RE: HOUSING SITES REZONE WORKSHOP - 2/13/2024

Good afternoon – I was not able to speak at the meeting yesterday. I would like to again invite all Board of Supervisors and Planning Commission staff to come out to view the property referred to as #34, Canal St, #038-104-095-000, to see for themselves why this site/property should be removed from the list of properties. I have attached two overhead satellite views to show predevelopment of the area. I have several photographs of the property however, my mail program will not allow me to attach them to this email. If you are interested in viewing all photographs, I can create a shared link for you. Please let me know.

256-1

I have also spoken to two business owners on Canal Street and they are also opposed to development of this site. I have encouraged them to contact the Board of Supervisors and Planning Commission to voice their concerns and opposition.

I would like to stress again that this is a wildlife habitat – home to birds of prey and their food source, coyotes, skunks, raccoons, opossums, etc. Preservation of their habitat is important. Even a partial development of this property/site will force the wildlife to relocate (possibly into existing neighborhoods) and could upset the balance of the circle of life. Forcing wildlife to adapt to a much smaller area is irresponsible.

I thank you for taking the time to review the attached satellite images and the concerns of future development of this property/site.

Pamela Lindsay

From: Pamela <pamelasno1@gmail.com>
Sent: Monday, February 12, 2024 4:28 PM
To: kkedinge@placer.ca.gov; BoardClerk@placer.ca.gov
Subject: FW: HOUSING SITES REZONE WORKSHOP - 2/13/2024

256-2

Good afternoon – I would like to amend my concerns regarding the Housing Sites Rezone project. I have revised my submission and am re-submitting this information. I am unable to email this to

each of the Board of Supervisors and their Chiefs of Staff for their information prior to the meeting tomorrow.

I have read the draft EIR on the Housing Element Sites Rezone. I am particularly concerned with a proposed site off Canal Street (referred to in Table 4, #34, property 038-104-095-000 12.8 acres, undeveloped). A revised Table 4 was recently issued showing this property as "5 acres, vacant" – its actually a 12 undeveloped acre parcel. My property on Lowe Lane neighbors this Canal street property. It is undeveloped and home to wildlife, specifically birds of prey and their food sources, and coyotes.

Question: Have any members of the Committee visited these proposed sites?

Comment/Concern: Looking at property records delineating property/plot lines is only a small step at identifying sites that could be proposed; however, a site visit to these proposed sites provides:

1. a real time view of how the area around the proposed site has been developed or not been developed;
2. Identifies challenges of accessibility due to predeveloped areas around the proposed site (can construction equipment access the proposed site? Does existing infrastructure support accessing proposed site both during and after development?) ;
3. Identifies new infrastructure needed to support both during and after development (how does current infrastructure support accessibility both during and after development?);
4. Identifies negative impact on existing infrastructure;
5. Additional impact on first responders (fire, police); and,
6. Requirement of Water and Sewer infrastructure development.

2562 cont.

Question: Has anyone contacted the owners of the businesses located on Canal Street and gathered their input?

Comment/Concern: These businesses will be negatively impacted if the Canal St. property is selected for development. Construction equipment will need to traverse through this convoluted business area during project development and depending on the infrastructure needed to be in place prior to the construction of low-income housing, it may be a few years of business interruption.

Question: Have properties/sites within other cities/towns within Placer County that meet the median income or have better infrastructure in place been considered for the low-income development?

Comment/Concern: I think low-income housing should be placed within the cities of Placer County that better meet or sustain the median income or have better infrastructure currently in place. There is a lot of undeveloped land out Hwy 65 towards Lincoln and Wheatland. Auburn already houses individuals who could be considered low-income. Why burden Auburn with more? We do have existing income based housing apartment complexes (1 was recently completed behind Home Depot, 2 are located behind Chase Bank, 1 is located on Silverbend Way, and there are others although I do not know exactly where they are located). Maybe the Board of Supervisors/Planning

256-2 cont.

Commission can require low-income or income-based housing units to be developed by the developers of the mega housing developments (i.e., Del Webb retirement communities. For example, in order for Del Webb to build another community they would also be responsible for either building low-income units or setting aside land for low-income units). It would be the same type of premise that for x number of houses built a playground or park is developed as well.
I understand that Placer County must provide low-income housing; however, I do not feel that the Canal Street property is a good fit to meet this mandate and should be removed from consideration. The area surrounding the entirety of the Canal Street property/site has been predeveloped and resulted in severely limited access to it. It is surrounded by small private lanes off Luther Road. Canal Street itself has been predeveloped with small businesses and there is no straight thoroughfare to traverse the area. There is no accessibility to the Canal St site from Hwy 49. Additionally a double canal system runs between Canal Street and the proposed site. I respectfully invite you to come for a site visit so that you can see the challenges faced for developing this proposed location.
I also feel that Placer County could meet the housing requirements by looking outside of Auburn to accomplish this.
On another note – the draft EIR made mention of additional EV charging stations at the developed low-income housing sites. Has anyone thought logically about this? If you are low-income, how do you afford to purchase an EV? Are there other sites (existing parking lots, etc) that could have EV charging stations installed?
Thank you for taking my comments/concerns into consideration.

Pamela Lindsay




Keyboard shortcuts
Imagery ©2024, Airbus, CNES / Air

LETTER 256: PAMELA LINDSAY

Response to Comment 256-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The County appreciates the commenter's concerns about the potential for future residential development on Site #34 to impact the existing wildlife habitat. Any impacts to these habitats would require PCCP compliance and implementation of applicable measures set forth in the Draft EIR, such as Mitigation Measures 5-3(a) through 5-3(d), Mitigation Measure 5-4, and Mitigation Measures 5-4(b) through 5-4(j). Payment of land conversion fees in accordance with the PCCP is used to fund the purchase and maintenance of habitat preserve areas in strategic locations throughout the County. The commenter's concerns have been forwarded to the decision-makers for their consideration.

Response to Comment 256-2

See Response to Comment 255-1.

Letter 257

From: Pamela
To: Kally Kedinger-Cecil
Cc: Board Clerk; Placer County Environmental Coordination Services; Planning Commission
Subject: RE: Housing Element Amendment Available for Public Review - Comment Period ending March 7, 2024
Date: Thursday, March 7, 2024 1:33:42 PM
Attachments: Image003.png

257-1

Good afternoon – I am submitting my opposition to the rezone/development of property #34, Canal St. As stated in my prior opposition submissions, this property is not the best property for rezone/development for low income housing units. I have submitted photographs showing the inability to access this property as the infrastructure for access as well as water/sewer/storm drain is not there. I understand that these items would need to be a part of the overall development of this property (or any properties). In reality, the existing development of businesses (on Canal Street) and the neighborhoods surrounding this property cannot support 112 units and the amount of individuals (estimate 500 or more at 4 per unit). This development will negatively impact our first responders (Cal Fire, police, hospitals). We are putting more burdens on our over-crowded school systems as well. Individuals who may move into this development who do not have their own transportation, will need to walk on Hwy 49 in an area that is not equipped with sidewalks in order to access public transportation (I believe the nearest bus stop is at Edgewood and Hwy 49). This is a safety issue. Sidewalks do not start until the north side of Luther (near Mels Diner). Individuals who may have their own vehicles will need to enter and exit this property through the businesses on Canal Street. This means they need to turn either right or left on Luther. The traffic pattern at Luther and Canal could become a concern due to the number of vehicles already traversing on Luther and how the eastbound traffic merges from 2 lanes into 1 lane just prior to Canal Street.

There have been many serious traffic accidents In Hwy 49 from Nevada Street thru the intersection at Luther.

Our county should be putting our priorities on strengthening our emergency response ability (with input from Cal Fire, Auburn police, Placer sheriffs, hospitals); environmental impacts; and, building more schools and hospitals to properly handle the influx of residents into the county BEFORE we move forward with building more housing. We cannot continue to "put the cart before the horse." North Auburn and Auburn are rural communities. We moved here for the aesthetics of country living. The Canal st property is somewhat of a mountainous topography. The eastern edge of the Canal st property is higher in elevation than the western edge; and, the north and south edges are higher than the middle of the property.

I am also truly concerned with the amount of money that the county will be spending in order to comply with the state housing mandate. Is the county prepared to spend that kind of money? What about the negative reassessment of property taxes for those residences whose property values will fall due to the development of low income housing? Is the county actually purchasing these properties for development?

I would encourage the county to request an extension (due to COVID shutdown) from the state housing mandate in order to strengthen and build out our infrastructure so that we can properly plan for and house the influx of new residents into our county. And please remember that building low income housing will not fix our homeless problem – you cannot FORCE homeless into housing.

257-1 cont.

Is or are there vacant hotel/motel buildings that the county can refurbish into low income units to assist in meeting the state housing mandate?

Please resubmit the photographs I submitted to placer county box on 2/20/2024 along with this opposition email. I also strongly believe that a site visit is in order to get a real time view of this property. Again, I am opposed to the rezone/development of the property identified as #34 Canal St. I thank you for the opportunity to voice my comments and concerns.

Pamela Lindsay
Property owner of 1415 Lowe Lane, Auburn, CA

From: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Sent: Friday, March 1, 2024 12:15 PM
Subject: Housing Element Amendment Available for Public Review

Hello,

This email is to inform you of the availability of the Housing Element Amendment for a seven-day public review period. The amendment has been compiled to address changes that have occurred since adoption in 2021 including the revisions to the Regional Housing Needs Allocation (RHNA) shortfall, the change in approach for accommodating the shortfall (from relying on an overly to now completing a rezone), and the modifications to the Housing Element Residential Land Inventory which includes the addition of nine new sites that were not previously identified in the adopted Housing Element. The public review period is beginning today (March 1, 2024) and closes on **March 7, 2024**. Following the public review period, the amendment and any comments received will be provided to the California Department of Housing and Community Development (HCD) for a 60-day review period. The amendment will be included with the report package for the Board of Supervisors meeting for a final action in May. The amendment and the appendix are available on the Housing Element webpage. In addition to this email notice and the posting on the Housing Element webpage, a notice regarding the amendment is being posted on the County's main webpage, the Housing Needs Rezone Program webpage, and social media.

Comments on the Housing Element Amendment can be submitted to Senior Planner Kally Kedinger-Cecil at kkedinge@placer.ca.gov or submitted in writing to:

Placer County Community Development Resource Agency
Planning Services Division
3091 County Center Dr., Ste. 190
Auburn, CA 95603

Regards,

Kally Kedinger-Cecil
Senior Planner
Placer County Planning Services Division
kkedinge@placer.ca.gov
530-745-3034



LETTER 257: PAMELA LINDSAY

Response to Comment 257-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, Master Response 4 – Traffic Safety, and Master Response 6 – Impacts to Local Schools. As detailed in Chapter 10, Fire Protection and Wildfire, of this EIR, the proposed project would not increase demands for fire protection services such that new or expanded facilities would be required. Similarly, as detailed in Section XV, Public Services, of the Initial Study, increased demand for public services, such as schools, and police and fire protection services, attributable to the proposed project would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts.

Letter 258

From: Pamela
To: Placer County Environmental Coordination Services
Cc: Board Clerk; Kally Kedinger-Cecil
Subject: Public comment period for the Housing Rezone Program Draft Environmental Impact Report (DEIR) on March 18, 2024.
Date: Friday, March 15, 2024 3:38:15 PM

Good afternoon – I am submitting my opposition to the rezone/development of property #34, Canal St. As stated in my prior opposition submissions, this property is not the best property for rezone/development for low income housing units. I have submitted photographs showing the inability to access this property as the infrastructure for access as well as water/sewer/storm drain is not there. I understand that these items would need to be a part of the overall development of this property (or any properties). In reality, the existing development of businesses (on Canal Street) and the neighborhoods surrounding this property cannot support 112 units and the amount of individuals (estimate 500 or more at 4 per unit). This development will negatively impact our first responders (Cal Fire, police, hospitals). We are putting more burdens on our over-crowded school systems as well. Individuals who may move into this development who do not have their own transportation, will need to walk on Hwy 49 in an area that is not equipped with sidewalks in order to access public transportation (I believe the nearest bus stop is at Edgewood and Hwy 49). This is a safety issue. Sidewalks do not start until the north side of Luther (near Mels Diner). Individuals who may have their own vehicles will need to enter and exit this property through the businesses on Canal Street. This means they need to turn either right or left on Luther. The traffic pattern at Luther and Canal could become a concern due to the number of vehicles already traversing on Luther and how the eastbound traffic merges from 2 lanes into 1 lane just prior to Canal Street.

258-1

There have been many serious traffic accidents In Hwy 49 from Nevada Street thru the intersection at Luther.

Our county should be putting our priorities on strengthening our emergency response ability (with input from Cal Fire, Auburn police, Placer sheriffs, hospitals); environmental impacts; and, building more schools and hospitals to properly handle the influx of residents into the county BEFORE we move forward with building more housing. We cannot continue to "put the cart before the horse." North Auburn and Auburn are rural communities. We moved here for the aesthetics of country living. The Canal st property is somewhat of a mountainous topography. The eastern edge of the Canal st property is higher in elevation than the western edge; and, the north and south edges are higher than the middle of the property.

I am also truly concerned with the amount of money that the county will be spending in order to comply with the state housing mandate. Is the county prepared to spend that kind of money? What about the negative reassessment of property taxes for those residences whose property values will fall due to the development of low income housing? Is the county actually purchasing these properties for development?

I would encourage the county to request an extension (due to COVID shutdown) from the state housing mandate in order to strengthen and build out our infrastructure so that we can properly plan for and house the influx of new residents into our county. And please remember that building low income housing will not fix our homeless problem – you cannot FORCE homeless into housing.

258-1 cont.

Is or are there vacant hotel/motel buildings that the county can refurbish into low income units to assist in meeting the state housing mandate?

Please resubmit the photographs I submitted to placer county box on 2/20/2024 along with this opposition email. I also strongly believe that a site visit is in order to get a real time view of this property. Again, I am opposed to the rezone/development of the property identified as #34 Canal St. I thank you for the opportunity to voice my comments and concerns.

Pamela Lindsay
Property owner of 1415 Lowe Lane, Auburn, CA

LETTER 258: PAMELA LINDSAY

Response to Comment 258-1

Please see Response to Comment 257-1.

Letter 259

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HOUSING SITES REZONE WORKSHOP - 2/13/2024
Date: Tuesday, February 20, 2024 9:18:12 AM
Attachments: image001.png
image001.png

From: Pamela Lindsay <pamelasno1@gmail.com>
Sent: Monday, February 12, 2024 11:36 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Re: HOUSING SITES REZONE WORKSHOP - 2/13/2024

259-1

I have a comment about information on page 25 under Existing Population and Housing Conditions. The last sentence of the 2nd paragraph states the median income of PLACER County is $99,734. Ok fine then the low income housing should be placed with in the cities that sustain the median income. I do not believe that Auburns median income is near this amount. Why burden Auburn, which already houses individuals who could be considered low income WITH MORE? Just a thought....

On Mon, Feb 12, 2024, 11:32 AM Kally Kedinger-Cecil <KKedinge@placer.ca.gov> wrote:

> Hi Pamela,
>
> Thank you for your comments, they will be incorporated into the project record and provided to the Board of Supervisors. Additional information on the program is available here: Housing needs rezone program | Placer County, CA
>
> Regards,
>
> Kally Kedinger-Cecil
> Senior Planner
> Placer County Planning Services Division
> kkedinge@placer.ca.gov
> 530-745-3034

From: Pamela <pamelasno1@gmail.com>
Sent: Monday, February 12, 2024 9:21 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk

<BoardClerk@placer.ca.gov>
Subject: HOUSING SITES REZONE WORKSHOP - 2/13/2024

Good morning – I would like to submit some comments regarding the upcoming Housing Sites Rezone Workshop scheduled for February 13, 2024. I have read the draft EIR on the Housing Element Sites Rezone. I am particularly concerned with a proposed site off Canal Street (referred to in Table 4, #34, property 038-104-095-000 12.8 acres, undeveloped). A revised Table 4 was recently issued showing this property as "5 acres, vacant" – its actually a 12 undeveloped acre parcel. My property on Lowe Lane neighbors this Canal street property. It is undeveloped and home to wildlife, specifically birds of prey and their food sources, and coyotes.

Question: Have any members of the Committee visited these proposed sites?
Comment/Concern: Looking at property records delineating property/plot lines is only a small step at identifying sites that could be proposed; however, a site visit to these proposed sites provides:

1. a real time view of how the area around the proposed site has been developed or not been developed;
2. Identifies challenges of accessibility due to predeveloped areas around the proposed site (can construction equipment access the proposed site? Does existing infrastructure support accessing proposed site both during and after development?) ;
3. Identifies new infrastructure needed to support both during and after development (how does current infrastructure support accessibility both during and after development?);
4. Identifies negative impact on existing infrastructure; and,
5. Additional impact on first responders (fire, police).

259-2

I understand that Placer County must provide low-income housing; however, I do not feel that the Canal Street property is a good fit to meet this mandate and should be removed from consideration. The area surrounding the entirety of the Canal Street property/site has been predeveloped and resulted in severely limited access to it. It is surrounded by small private lanes off Luther Road. Canal Street itself has been predeveloped with small businesses and there is no straight thoroughfare to traverse the area. There is no accessibility to the Canal St site from Hwy 49. Additionally a double canal system runs between Canal Street and the proposed site.

On another note – the draft EIR made mention of additional EV charging stations at the developed low-income housing sites. Has anyone thought logically about this? If you are low-income, how do you afford to purchase an EV? Are there other sites (existing parking lots, etc) that could have EV charging stations installed?

259-2 cont. ↑

Thank you for taking my comments/concerns into consideration.

Pamela Lindsay

LETTER 259: PAMELA LINDSAY

Response to Comment 259-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 259-2

Please see Response to Comment 255-1.

Letter 260

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HOUSING SITES REZONE WORKSHOP - 2/13/2024
Date: Tuesday, February 20, 2024 9:17:48 AM

From: Pamela <pamelasno1@gmail.com>
Sent: Monday, February 12, 2024 9:21 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: HOUSING SITES REZONE WORKSHOP - 2/13/2024

260-1

Good morning – I would like to submit some comments regarding the upcoming Housing Sites Rezone Workshop scheduled for February 13, 2024. I have read the draft EIR on the Housing Element Sites Rezone. I am particularly concerned with a proposed site off Canal Street (referred to in Table 4, #34, property 038-104-095-000 12.8 acres, undeveloped). A revised Table 4 was recently issued showing this property as "5 acres, vacant" – its actually a 12 undeveloped acre parcel. My property on Lowe Lane neighbors this Canal street property. It is undeveloped and home to wildlife, specifically birds of prey and their food sources, and coyotes.

Question: Have any members of the Committee visited these proposed sites?
Comment/Concern: Looking at property records delineating property/plot lines is only a small step at identifying sites that could be proposed; however, a site visit to these proposed sites provides:

1. a real time view of how the area around the proposed site has been developed or not been developed;
2. Identifies challenges of accessibility due to predeveloped areas around the proposed site (can construction equipment access the proposed site? Does existing infrastructure support accessing proposed site both during and after development?) ;
3. Identifies new infrastructure needed to support both during and after development (how does current infrastructure support accessibility both during and after development?);
4. Identifies negative impact on existing infrastructure; and,
5. Additional impact on first responders (fire, police).

I understand that Placer County must provide low-income housing; however, I do not feel that the Canal Street property is a good fit to meet this mandate and should be removed from consideration. The area surrounding the entirety of the Canal Street property/site has been predeveloped and resulted in severely limited access to it. It is surrounded by small private lanes off Luther Road. Canal Street itself has been predeveloped with small businesses and there is no straight thoroughfare to traverse the area. There is no accessibility to the Canal St site from Hwy 49. Additionally a double canal system runs between Canal Street and the proposed site.

On another note – the draft EIR made mention of additional EV charging stations at the developed low-income housing sites. Has anyone thought logically about this? If you are low-income, how do you afford to purchase an EV? Are there other sites (existing parking lots, etc) that could have EV

260-1 cont.

charging stations installed?

Thank you for taking my comments/concerns into consideration.

Pamela Lindsay

LETTER 260: PAMELA LINDSAY

Response to Comment 260-1

Please see Response to Comment 255-1.

Letter 261

From: Cyndi
To: Placer County Environmental Coordination Services
Cc: Don Whitecar
Subject: Housing Element Amendment and RHNA Rezone Granite Bay
Date: Monday, March 18, 2024 4:39:05 PM

For your consideration:

261-1 I am a Granite Bay property owner residing at 6762 Eureka Road. This parcel has been in my family for 50 years. I have had many opportunities to work with the Placer County planning department regarding development adjacent to my property. The planners I have worked with proceeded in a fair, logical way to come up with solutions that benefited both the land owner and the county's needs. With the State of California mandating housing density , Placer County staff seems to be in a mad scramble to comply, and the Granite Bay Community Plan is getting tossed out.

261-2 I sent an email to our Supervisor Jones in regard to the increased speed limit on Eureka Road from 35 to 40 MPH. No response was received. Eureka has become the cut through from Folsom to Roseville as drivers avoid Douglas Blvd. Currently,the build out of the 33 homes in the Blue Mountain Ventura Project is not even complete. Eureka Road traffic, along what was to be maintained as a rural two lane road, is having a major impact on residents. The health, safety and welfare of the Granite Bay area residents is being violated with an environment filled with excessive noise and air pollution from traffic already. And now the plan is to add an additional 500 residences on the corner of Auburn Folsom and Eureka Road? Where are these new residents supposed to park? This community cannot support the added traffic without our quality of life being destroyed completely. Is there any consideration of the current environment which Granite Bay residents chose to raise their families in?

261-3 This community is dependent on the automobile, an an EV is not in the budget for me nor will be for others living in these proposed affordable living units. More cars, more noise, more air pollution, more fatalities. The only affordable grocery store, Walmart, is 4 miles away and will be closing in April. There will be long drives to find

261-3 cont. affordable food now.

I am a member of Granite Bay Flycasters, a 320 member club of environmentalists that support thriving fisheries in California. The draft EIR seems to ignore the impacts to protected oak trees, migration corridors, special-status wildlife species, and sensitive habitats especially on lot 26. What of the creek that exists on that property an the Salmonids it supports? Is the effect of an additional 500 residences on the overuse of the adjoining Folsom Lake State Park taken into consideration?

261-4

Find another site that is close to public transportation, jobs, schools, and medical facilities. Use the land the County already owns. Do not destroy the environment in Granite Bay. Make the builders include affordable homes within the developments that are taking up every inch of Granite Bay, and quit taking builder's buy offs. Do not make the current residents of Granite Bay suffer from this State's mandates. Preserve the clean, safe environment of Granite Bay

Thank you for your time
Cynthia Litzko
6762 Eureka Rd
Granite Bay Ca

LETTER 261: CYNTHIA LITZKO

Response to Comment 261-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 261-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 261-3
Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, and Response to Comment 210-1.

Response to Comment 261-4
Please see Master Response 1 – Non-EIR/Administrative Issues, as well as Responses to Comments 52-2, 163-4, 163-14, and 163-15.

Letter 262

From: Scott Lockwood
To: Placer County Environmental Coordination Services
Subject: SAVE GRANITE BAY - NO NEW HOUSING
Date: Friday, March 15, 2024 5:08:23 AM

Hello,

I have lived in Granite Bay for nearly 30 years. I've seen this town transform before my eyes, as more and more of the natural beauty has been destroyed in the name of new construction and housing. Even still, developers are looking to squeeze every last dollar they can out of whatever land is left to rezone with zero concern for the people that already live here. We are sick of it, and we want it to stop.

We do not want or need any more high-density, low-income housing in Granite Bay.

Do not touch the following parcels:
Property #19
Property #20
Property #23
Property #24
Property #25
Property #26
Property #27
Property #28
Property #29
Property #30
Property #31

262-1

To allow this degradation is traitorous at best. The various plots of land proposed for rezoning do not make any sense, as the infrastructure surrounding them don't support the significant population and traffic increases. Build these new projects somewhere else in Placer County where new infrastructure can be properly planned to accommodate the

262-1 cont.

population increases.

Stop this blatant money grab, stop destroying our remaining rural landscape, stop selling out your neighbors, and protect the town we care about before it becomes even less recognizable.

Seriously Concerned,

Scott Lockwood

LETTER 262: SCOTT LOCKWOOD

Response to Comment 262-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 263

From: Wesley Lucey
To: Placer County Environmental Coordination Services
Subject: Rezoning
Date: Thursday, March 14, 2024 1:59:39 PM

263-1

I Am a resident on Americana Dr. near Baseline Road in Roseville CA. East Drive is just across baseline from our location. I do not agree with the rezoning effort at location 8 which is East Dr and Baseline Road, mainly due to the impact on the existing neighbors along East Dr.

But I also have concerns with the traffic impact along Baseline Road. With all the new construction in West Roseville, they are anticipating an increase to 40,000 cars a day along this stretch of road. Adding an apartment complex only exacerbates the issue.

If the rezoning does take place at this location, all I ask is a traffic signal is installed for East Dr and Baseline Rd. It's hard enough turning off of Americana Dr, a school drive mind you, with the current traffic. Not to mention there are no cross walks in either direction for at least a mile or two.

Wesley Lucey
Project Manager
916-836-6181

Sent from my iPhone

LETTER 263: WESLEY LUCEY

Response to Comment 263-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 264

From: Lauren Ludlow
To: Placer County Environmental Coordination Services
Subject: Written Comment Supporting Rezoning/ Draft Environmental Impact Report
Date: Monday, March 18, 2024 1:11:45 PM

264-1

My name is Lauren Ludlow and I'm a resident of Placer County District 1.

I am writing to support the proposed sites for rezoning for higher-density/ affordable housing. Affordable housing is essential for keeping communities vibrant, growing, and thriving and high-density housing is needed to make housing affordable and accessible and to both prevent and address homelessness. I live near the proposed sites for rezonining and I believe they are good sites for rezoning due to their proximity to amenities, the freeway, and the sorts of supports needed for higher density housing.

Thank you for your time and the work you do for our community!

Sincerely,

Lauren Ludlow

LETTER 264: LAUREN LUDLOW

Response to Comment 264-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 265

From: Lynch, Jessica
To: Placer County Environmental Coordination Services
Cc: Isom, Mike
Subject: FW: Placer County-Housing Element Sites Rezone (PLN22-00476)
Date: Tuesday, March 12, 2024 10:44:19 AM
Attachments: Crash Year granite bay 2023 (1).docx
EX_LOS-V2_2019-01-08_Intersections (1).pdf
2023_ADT_GraniteBay.xlsx

Hello,

The City of Roseville has received this email and a call from this Placer County resident regarding the Placer County Housing Element Sites Rezone Draft EIR. The City has no intention of sending a comment letter at this time.

Jessica Lynch
Environmental Coordinator
Development Services Dept.
direct: (916) 774-5352
main: (916) 774-5276

From: Mar, Escarlet <EMar@roseville.ca.us>
Sent: Tuesday, March 12, 2024 10:34 AM
To: Lynch, Jessica <JJLynch@roseville.ca.us>
Subject: FW: Placer County-Housing Element Sites Rezone (PLN22-00476)

Hi Jessica,

Please see email below. This sounds like a resident concern.

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, March 11, 2024 4:09 PM
To: Planning External <PlanningDivision@roseville.ca.us>
Subject: Placer County-Housing Element Sites Rezone (PLN22-00476)

EXTERNAL: This email originated from outside of the organization. Do not click on any links or open attachments unless you recognize the sender and know the content is safe.

RE: Placer County-Housing Element Sites Rezone (PLN22-00476)
Attn: Mike Isom *Development Services Director*

Hello Director Isom,

265-1 I called your office recently and asked if Roseville had provided a response to the Notice of Preparation to the Placer County's Housing Element Sites Rezone DEIR. The planner I spoke with checked with Roseville Environmental Services and said that Roseville had not filed a response to the NOP.

265-2 **The Draft Environmental Impact Report** is available for review on the Environmental Coordination Services webpage: **Housing Element Sites Rezone | Placer County, CA**. Comments on the draft EIR can be submitted by 5 pm on March 18 via email to: cdraecs@placer.ca.gov or via fax at (530) 745-3080.
https://www.placer.ca.gov/9455/Housing-Element-Sites-Rezone
https://www.placer.ca.gov/8794/Housing-needs-rezone-program

265-3 I have concerns that some of the proposed sites may impact Sierra College and Douglas. Additionally, 4 sites are proposed in Granite Bay which due to the large number of units proposed cumulatively could impact traffic in Roseville.

I have lived in Granite Bay over 25 years and have paid close attention to the traffic challenges on major arterials. There were concerns listed with the Whitehawks developments (I&II) on Douglas just east of the Sierra College and Douglas intersection. Placer County is expected to widen Douglas just east of Sierra College to 6 lanes. This has not happened although several developments have been approved along Douglas and on Sierra college since. Of note, is approval of Bayside Soccer fields including regional tournaments and a couple mini storage facilities. The Rezone proposal includes housing on the Bayside property on the north end of the Bayside off of Sierra College.

265-4 The Douglas and Sierra College intersection regularly has traffic backed up in the intersection. Traffic is often blocking the intersection when the light changes. It would be greatly appreciated if you could look at the current Placer DEIR for impacts.

265-5 Please see the latest traffic accident and death statistics provided by the California Highway Patrol for major intersections. These were provided to the Placer District 4 Chief of Staff.

Also included is LOS for some intersections provided by Katie Jackson Placer Traffic Engineering KJackson@placer.ca.gov .

Michael Spelis Chief of Staff
Office of Supervisor Suzanne Jones Placer County District 4
MichaelSpelis@Placer.ca.gov
916-719-2955
Traffic statistics from: Norman, Yvette@CHP <YNorman@chp.ca.gov>

Thank you for your consideration,

Cheryl Berkema
916 202-7957

LETTER 265: JESSICA LYNCH

Please note that Letter 265 was originally emailed to the City of Roseville. The City of Roseville provided Letter 265 via email to Placer County on March 12, 2024.

Response to Comment 265-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 265-2

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 265-3

This comment states that the proposed project could impact traffic in the City Roseville, specifically at the intersection of Douglas Boulevard and Sierra College Boulevard. It is noted that a nearby development project (Whitehawk II) is required to widen Douglas Boulevard to six lanes, just east of Sierra College Boulevard. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 265-4

This comment states that there is regular traffic congestion at the intersection of Douglas Boulevard and Sierra College Boulevard in the City of Roseville. Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and Granite Bay Community Plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 265-5

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 266

From: Karenda MacDonald
To: Placer County Environmental Coordination Services
Subject: Draft report on Housing Element Sites Rezone
Date: Friday, February 9, 2024 11:53:38 AM

266-1

To whom it may concern,
I just wanted to send a quick email in regards to the draft EIR on the housing element site rezone. I strongly support the rezoning of select properties in placer county to allow for multi family housing. We have a housing shortage and it's important for the future health and prosperity of our communities to provide locations where more intense housing elements can be built. The addition of more diversified housing types in our area will allow for a wider variety of different incomes to live and work in placer county - I see this as very good and necessary. Specifically on the EIR some minor impacts were noted in relation to the increased intensity of development, but the overall value provided by the rezone outweighs any of the indicated impacts. I support this rezone and look forward to following how this item proceeds through the approval process.
Thank you,
Karenda MacDonald
9471 Powerhouse Road
Newcastle, CA 95658
Phone: 916-616-6135

LETTER 266: KARENDA MACDONALD

Response to Comment 266-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 267

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Concerns Regarding Proposed Low-Income/Homeless Housing Community on Bell Road
Date: Tuesday, February 20, 2024 9:13:41 AM

From: Meredith Manz <meredith_manz@yahoo.com>
Sent: Wednesday, February 7, 2024 5:54 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Cc: 'Janis Manz' <manzjanis@yahoo.com>
Subject: Concerns Regarding Proposed Low-Income/Homeless Housing Community on Bell Road

Dear Kally Kedinger-Cecil,

I would like to express my **Extreme** concern about the proposed Very Low-Income/Homeless Housing (VLIH) community to be located on Bell Road near Auburn Presbyterian Church (corner of New Airport Road). Please see my concerns/negative feedback below:

267-1

- More traffic. Where will the entrance/exit to the community be?
- Size of the community - 316 units is tremendously large. Concerns about increased burden on local schools, roads, and first responders.
- Safety/security/homeless loitering, concerns for neighborhood people taking walks/runs in the area.
- Homeless begging.
- Cleanliness/sanitation.
- Reducing property values of upscale homes and businesses in the area (Sullivan Ranch, Princeton Club, The Ridge).
- Who is paying for this development?
- Who is paying the rent? Tenants? Government subsidies? Tax payers?
- Community attracting more homeless to the area that don't live in the community.
- Drugs/paraphernalia.
- More crime/domestic violence/drunk and high community residents.
- Increased noise potential.
- Will there be controls in place? Any onsite management/security to enforce rules?
- Will there be any management inspections, for example, to prevent meth labs?
- Will police patrol community?

- Will there be any rules about maximum occupancy per unit?
- Will there be garages/storage units for rent by tenants? Concerned about illegal activity taking place in these areas. Concerns about homeless that are not named on the lease living in garages.
- Fire protection?
- Concerns about potential fires being created by things like meth labs and homeless trying to stay warm.
- What about animal control? Many homeless have unsafe animals with diseases and animals that may attack.

267-1 cont.

- How will it be decided who will lives in this community? Criteria? Will homeless be required to have jobs?
- Trash and community being an eyesore.
- No proper infrastructure in place, i.e. lack of sidewalks on Bel Road or New Airport.

This is not the proper location for this community. I appreciate your time and attention to this matter.

Sincerely,

Concerned resident/owner - Sullivan Ranch

Janis Manz

(530) 305-5324

LETTER 267: MEREDITH MANZ

Response to Comment 267-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, Master Response 4 – Traffic Safety, and Master Response 6 – Impacts to Local Schools.

As detailed in Chapter 10, Fire Protection and Wildfire, of this EIR, the proposed project would not increase demands for fire protection services such that new or expanded facilities would be required. Similarly, as detailed in Section XV, Public services, of the Initial Study, increased demand for public services, such as police and fire protection services, attributable to the proposed project would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts.

Letter 268

From: sandra marquez
To: Meghan Schwartz
Subject: Re: Housing Element Sites Rezone (PLN22-00476) DEIR
Date: Wednesday, February 7, 2024 10:40:47 AM
Attachments: image002.png

268-1

Thank you for this communication but wanted to suggest you send it from Placer County as I nearly deleted it because I didn't recognize your name. This has happened with other communications as well so just a suggestion. Also, I remember something coming up with a change in date, so wanted to clarify that this meeting is actually 2/22 and not 2/13?

Cordially,
Sandy
Placer County

On Friday, February 2, 2024 at 01:37:41 PM PST, Meghan Schwartz <mschwartz@placer.ca.gov> wrote:

The Draft Environmental Impact Report (DEIR) for the subject project has been released for public review from **February 2, 2024 thru March 18, 2024**.

The Notice of Available of the Draft EIR is attached for your convenience, and you can view/download the DEIR at the link below:

Housing Element Sites Rezone | Placer County, CA

The Planning Commission will accept verbal comments on the DEIR at the following meeting:

Thursday, February 22, 2024

A public meeting will be held on February 22, 2024, to receive comments on the Draft EIR. Public comment will be offered in-person and virtually:

- In-Person: Placer County Planning Commission, Planning Commission Hearing Room, Community Development Resource Center, 3091 County Center Drive, Auburn, California.
- Virtually through a Zoom meeting webinar.

The Placer County Planning Commission meeting will begin at 10:00 a.m.; however, the proposed project is not time certain. Please refer to the meeting agendas at the following link up to 1 week prior to the meetings for updated information: https://www.placer.ca.gov/AgendaCenter/Planning-Commission-53

Meghan Schwartz, CDRA Technician
Community Development Resource Agency
3091 County Center Dr, Suite #190
Auburn, CA 95603
(530) 745-3075
mschwartz@placer.ca.gov

LETTER 268: SANDY MARQUEZ

Response to Comment 268-1

Please Master Response 1 – Non-EIR/Administrative Issues.

Letter 269

2/13/2024

Important Issues for Rezoning

1. Natural Drainage and Wetland. These areas allow water from the City of Roseville, Areas West of East Dr to drain all the way down to Dry Creek. If disturbed it will cause flooding all the way back through the houses to the West. Just the houses on Brady and Vinyard have caused the water to back up into our area. Last year was the worst year since we moved here in 1976.

269-1

2. Nature: These areas are natural Habitat for wildlife. There are Deer, Wild Turkey, Racoon, Possum, Skunk, and an occasional Mountain Lion.
3. The City of Roseville and Placer County cannot control the rising crime rate now. If these units are allowed to be built the crime rate will rise dramatically. Watching the the news last night and there were murder and violent crime all over the tv and most of the pictures I saw were in these kind of areas. This is a older area with many senior citizens years, myself 47 years on East Dr, who have lived and raised their families here. We would suffer greatly.
4. Traffic would increase and this area is a favorite place for the people North of Baseline to walk.

5. Just this morning I watched the sunrise from my driveway.



6. Beautiful. Would all be blocked if apts. are built.
7. Construction would take several years to construct and the noise would be unbearable, not to mention the dirt and dust created.

All of these issues and many more will cause great harm and distress to this area. This is not a good thing for anyone.

Thank You for your time

Charles L. Marsh

8140 East Dr.

Roseville, Placer County, Ca.

269-1 cont.

LETTER 269: CHARLES L. MARSH

Response to Comment 269-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Mitigation Measures X-1 and X-2 of the Initial Study require preparation of a Final Drainage Report prior to the approval of each future development project. In general, the Final Drainage Reports would specify the existing conditions of each rezone site, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from each project, as well as water quality protection features and methods to be used during construction, and long-term post-construction water quality measures.

As discussed in Chapter 5, Biological Resources, of the Draft EIR, with incorporation of the mitigation measures contained therein, all potential impacts related to biological resources, including wildlife, would be reduced to a less-than-significant level.

With respect to construction noise, as discussed in Impact 7-1, because ambient noise conditions at each rezone site are unknown, and specific development plans associated with rezone sites have not been prepared, it cannot be known with certainty whether construction noise best practices would be able to prevent ambient noise levels at each rezone site from increasing by 5.0 dB or more during future construction activities. Notwithstanding, it is anticipated that construction activities at many rezone sites, where sensitive receptors are not located in close proximity, would not result in a significant construction noise impact. Implementation of Mitigation Measure 7-1 would be required for all sites and would help to reduce any potential temporary noise impacts. However, the effectiveness of the measure would vary from site to site and may not prevent ambient noise-level increases due to project construction from exceeding 5.0 dBA, relative to existing levels. Therefore, the EIR conservatively concluded that the potential impact related to temporary increases in ambient noise levels would remain significant and unavoidable. The Board of Supervisors would consider a Findings of Fact and Statement of Overriding Considerations as required by CEQA, for any significant and unavoidable impacts identified in the Draft EIR.

With respect to construction dust, construction activities related to implementation of the proposed project would be subject to PCAPCD Rule 228. Rule 228 requires projects involving earth-disturbing activities to implement various dust control measures, such as minimizing track-out on to paved public roadways, limiting vehicle travel on unpaved surfaces to 15 miles per hour, and stabilization of storage piles and disturbed areas. In addition, standard Placer County conditions of approval for proposed projects within the County include various requirements that would result in additional reductions of emissions related to implementation of the proposed project. For example, the applicant for any future development at the rezone sites would be required to submit a Dust Control Plan to PCAPCD if the project area to be disturbed is greater than one acre.

Furthermore, as discussed in Section I, Aesthetics, of the Initial Study prepared for the proposed project (attached as Appendix A of the Draft EIR), under CEQA, the aesthetic impact analysis for a proposed project is focused on potential impacts to public views rather than private views.

Letter 270

From: Melissa Masinter
To: Placer County Environmental Coordination Services
Subject: Rezoning of 8989 Auburn Folsom Road next to Cavitt Junior High
Date: Thursday, March 14, 2024 1:01:42 PM

I am a resident and home owner in the neighborhood of Joe Rodgers and Itchy Acres Rd in Granite Bay.

My Husband and I are very concerned about this rezoning project.
Our concerns are as follows :

1. This may alter the feel of our neighborhood and those that surround us.

2. This will increase the traffic around Auburn Folsom Road, Cavitt Stallman, Joe Rodgers, Barton and Douglas Blvd, which are already very busy.

3. We feel Granite Bay does not have adequate infrastructure in place to accommodate these additional residents. (We already had one fire station closed last year)

270-1

4. We are concerned that the police, fire and sheriff departments do not have adequate funding in place for additional staffing, equipment and potentially office space to handle a project like this.

5. We are skeptical that there is adequate public transportation and close by good paying jobs to handle the additional residents.

6.Adequate parking seems to always be a problem for these types of projects.

If this rezoning is approved will further rezoning for additional areas follow?

Please do not let this rezoning happen and destroy our community.

Thank You for your support.
Melissa Masinter
408 888-0707

LETTER 270: MELISSA MASINTER

Response to Comment 270-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

As discussed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project (attached as Appendix A to the Draft EIR), the existing infrastructure that is located within the vicinity of each rezone site is included in the Site Inventory Forms prepared for the proposed project (attached as Appendix C to the Draft EIR). As presented therein, existing water and sewer infrastructure is generally located in the immediate vicinity of the rezone sites. Such infrastructure would be used to provide water and sewer service to future development on the rezone sites. With respect to nearby water infrastructure, the Site Inventory Form for Rezone Site #26 (see Appendix C to the Draft EIR), indicates that there is an 18-inch water line in Eureka Road. Any connections to the existing water line would be completed within existing disturbed rights-of-way and thus would not result in significant impacts to the physical environment. Furthermore, pursuant to General Plan Policy 4.D.3, the project applicant of each future residential development project on the rezone sites would be required to provide written certification from the sewer service provider that either existing services are available or needed improvements would be made prior to occupancy of the development. Compliance with General Plan Policy 4.D.3 would ensure that adequate capacity would be available to serve the projected demand generated by the future residential development of each rezone site, in addition to the County's existing commitments.

In addition, as detailed in Section XV, Public Services of the Initial Study, increased demand for public services, such as fire and police protection services, attributable to the proposed project would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts.

Letter 271

March 4, 2024

Dear Supervisor Gore:

We live in the Morgan Creek subdivision area in Roseville with zip code 95747. We are considered a part of the Dry Creek Community. We bought our home in 2003 and are strongly opposed to having a Re-Zone of Dry Creek sites, 7, 8, 9 and 10, particularly on Cook Riolo Road right across from the Creekview Ranch School to allow for low income high density housing of 20-30 units per acre.

Our Dry Creek area has always had a rural feel and we love that about our area. This is why we and many others chose to purchase homes and live in this area. Bringing in high density housing of any kind will ruin the charm, lifestyle and landscape surrounding us.

High density housing will impact our roads, water supply, sewage system that was originally planned for low density housing.

271-1 We do not want reduced Green Space. This will happen if high density housing is developed here. We want to retain the green space that we currently have! We don't want increased pollution and the wildlife habitats to be disturbed.

We have rural roads here in the Dry Creek area. We can't accommodate high traffic volume. We have enough traffic congestion in front of Creekview Ranch K-8 school and District Offices during school hours.

We need to protect our neighborhood, our home values, wildlife and open space in nature's beauty. Please don't compromise the integrity of our rural beauty and the character of established communities. This proposed Re-Zone to build homes low income multi family two story apartments on a portion of Cook Riolo Road and East Road and Brady Lane in Roseville should not move forward.

Thank you for reading this letter that addresses our concerns.

Sincerely,

Matthew C. Youell
Matthew C. Youell

Dana L. Mazza-Youell
Dana L. Mazza-Youell

LETTER 271: DANA L. MAZZA-YOUELL AND MATTHEW C. YOUELL

Response to Comment 271-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 272

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Long time resident
Date: Monday, March 11, 2024 10:10:55 AM

-----Original Message-----
From: Greg and or Susie McAtee <gsmcatee84@gmail.com>
Sent: Friday, March 8, 2024 2:39 PM
To: jess.negrete@hcd.ca.gov; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Long time resident

To:
Kally Kedinger kkedinge@placer.ca.gov
Jess Negrete jess.negrete@hcd.ca.gov

Subject:
COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

272-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

272-1 cont.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Susan McAtee
Long time resident of the Sry Creek Cimmunity

LETTER 272: SUSAN MCATEE

Response to Comment 271-1

Please see Responses to Comment Letter 62.

Letter 273

From: Lisa McGlone
To: Placer County Environmental Coordination Services; Supervisor Gore
Subject: Opposition to District 1 Rezoning
Date: Monday, March 18, 2024 4:48:42 PM

To the Planning Commission and Supervisor Gore,

273-1 I oppose the proposed rezoning in District 1 of Placer County. This unprecedented high density property rezoning of 4 rural sites in an unincorporated area of Roseville known as the Dry Creek Community will not be ignored. This is a poorly planned, extremely expedited attempt to satisfy the Placer County Housing Element requirements for low and very-low income households as determined by the state. While this density may be suitable in some contexts, I believe this is a completely inappropriate designation to thrust into a historic rural community with a century of agricultural/low density zoning.

273-2 The Dry Creek Community does not have the sidewalks, street lights, infrastructure, fire and law enforcement coverage, or proximity to practical amenities that are needed to make high density, low income housing successful. Furthermore, the scale of the buildings (likely 3 story apartments) needed to fulfill the RM30 zoning requirement would be altogether out of place among the 1-2 acre farm parcels and low density neighborhoods that drew new and old residents alike to put down roots here.
Recent community opposition to this rezoning initiative has already brought over 500 residents together to share our concerns with this unfair and ill-planned initiative that will affect longstanding property values and quality of life.

273-3 The 4 sites which have been targeted for RM30 rezoning in the Dry Creek Community are numbers 7, 8, 9, and 10. Site 8 is the Strawberry Patch on Baseline Road which backs up to farm parcels on all sides, Site 7 is adjacent to a large farm parcel on Vineyard Road, Sites 9 & 10 are across the street from Creekview Ranch school (grade K-8) on Cook Riolo Road. I oppose all four of these sites.

273-4 Placer County's own zoning policy has required builders to allot 10% of projects over 100 homes for affordable housing. But for DECADES, builders have been allowed to avoid fulfilling this requirement by paying the County an "in lieu" fee to excuse them from building affordable housing in their developments. This has now created a significant shortfall which is being shoved on the rural residents of unincorporated Placer County including the Dry Creek Community.

In an effort to make up for this shortfall of affordable housing, Placer County's Board of Supervisors and County Planning Department launched a campaign last summer to recruit land owners in unincorporated areas to offer up their properties for RM30 rezoning. My opposition stems from the lack of insight and awareness that went into the selection of rural properties with little to no resources to support such a population expansion.

Here are several key issues regarding the major concerns with the properties on the rezone list:
273-5 1. 23.5% of the proposed rezone sites for the entire County of Placer are in a 2.2 square mile area of the Dry Creek Community. We believe this is a disproportionately burdensome amount of high density housing for such a small community to bear. This is clearly not the result of careful planning, but rather the byproduct of binding the fate of the housing element to voluntary property owners willing to participate in this program.
273-6 2. Properties 9 & 10 are directly across the street from Creekview Ranch K-8 School. No other school in our area has high density low income housing in such close proximity to young children. We believe the 138 proposed apartment units pose significant risks to students including: increased crime near the school that is commensurate with apartment communities of all types, increased risk of collisions as children walk to school through heavy traffic intersections on dangerous two lane roads, unnecessary exposure to individuals with mental illness and substance abuse issues (i.e. homeless housing initiatives which are becoming more and more common in this state in affordable housing contexts), and unacceptable danger from unreported and unidentified sex offenders in such a transient apartment context.
273-7 3. Properties 7 & 8 would have a significant negative impact on a major water drainage pathway that both floods in the winter and simultaneously recharges the underground water table for local wells. Further investigation into water flow, rain drainage, and flood risks were not adequately accounted for in the Draft EIR and may make the land altogether unsuitable for building on.

273-8

4. Potential financial liabilities to existing low income property owners on surrounding parcels near proposed rezone sites. If city water and sewage are piped within 300 feet of rural parcels current property owners will be compelled to join city water and sewage at their own expense should their well or septic fail. While this would not warrant mention the Draft EIR, there is a COMMUNITY impact that is being left out of consideration here. This means that a decades long rural resident, who moved to an area for the agricultural zoning may be forced to pay $35,000-$80,000 out of pocket if their septic system ever failed or if they wanted to build an ADU on their property because a new zoning moved in next door. That does not seem fair or right.

273-9

5. Infrastructure expansion will result in the widening of roads and the installation of miles of sidewalks that will significantly affect the property of many long-time residents. Loss of property, trees, livestock fences, and privacy will be the result these residents will suffer because these projects were not placed in thoroughly planned developing areas in unincorporated Placer County.

273-10

6. Properties 7 & 8 will threaten local residents' ability to continue generations of livestock keeping by placing 3 story buildings near the noise, smells, and activities that are normal for all farms in rural settings. When the act of raising animals becomes a nuisance to local neighbors they may create ordinances to restrict livestock in rural Roseville altogether.

273-11

7. This type of rezoning of any property in the already established Dry Creek area to high-density will set a precedent in this community completely obliterates our community plan and paves the way for future high density rezoning projects to meet the low-income housing needs of this county caused by decades of poor planning. This would make rural and unincorporated areas easy (albeit inappropriate) locations for the county to expand any unmet obligations in the plentiful planned developments now being expanded across the region.

273-12

8. Unincorporated areas rely on Cal Fire and Placer County Sheriff's office for their fire, emergency, and police services. These entities are already stretched thin and are having challenges finding qualified individuals to fill their vacant positions. Adding a large population boost in this area will only exacerbate the strain on these institutions to the detriment of our community.

273-13

My family has been in this community since 1987 and it has always been zoned for low density. I cherish and adore this area and am crestfallen that because of poor planning by those elected to look out for the community's best interest. YOU at the decision-making level, need to take MORE TIME to explore other options, including county owned property, that can better accommodate the needs of affordable housing projects without negatively impacting so many existing residents of Placer County.

Sincerely,
Lisa McGlone

LETTER 273: LISA MCGLONE

Response to Comment 273-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 273-2
As discussed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project (attached as Appendix A to the Draft EIR), the existing infrastructure that is located within the vicinity of each rezone site is included in the Site Inventory Forms prepared for the proposed project (attached as Appendix C to the Draft EIR). As presented therein, existing water and sewer infrastructure is generally located in the immediate vicinity of the rezone sites. Such infrastructure would be used to provide water and sewer service to future development on the rezone sites. In addition, as detailed in Section XV, Public Services, of the Initial Study, increased demand for public services, such as fire and police protection services, attributable to the proposed project would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts.

With respect to Cavitt Junior High School traffic concerns, please see Responses to Comment Letter 4 and Response to Comment 470-2.

With respect to infrastructure availability in the Dry Creek area, please see Response to Comment 115-3.

Response to Comment 273-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 273-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 273-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 273-6
Please see Responses to Comment Letter 4 and Master Response 4 – Traffic Safety.

Response to Comment 273-7
Mitigation Measures X-1 and X-2 of the Initial Study require preparation of a Final Drainage Report prior to the approval of each future development project. In general, the Final Drainage Reports would specify the existing conditions of each rezone site, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from each project, as well as water quality protection features and methods to be used during construction, and long-term post-construction water quality measures.

Response to Comment 273-8

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 273-9

Please see Master Response 2 – Social and Economic Impacts and Response to Comment 273-1, above. There is no requirement to widen roads to accommodate potential future residential development on Rezone Sites #7, #8, #9, and #10. Should a future residential development application come forward for any of the subject sites at a future date, the County would review the application(s) and determine whether roadway improvements are required in conformance with County standards. Typically, only frontage improvements are required along the development site, which would not impact adjacent properties.

Response to Comment 273-10

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. Placer County has adopted a Right-to-Farm Ordinance (Section 5.24.040 of the Placer County Code) to minimize loss of the County's commercial agricultural resources by limiting the circumstances under which agricultural operations may be deemed to constitute a nuisance. Section B of the Right-to-Farm Ordinance states the following:

> No agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than one year if it was not a nuisance at the time it began.

As such, the County protects the right to farm and agricultural uses near potential rezone sites would not be considered nuisances.

Response to Comment 273-11

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Chapter 11, Statutorily Required Sections, of the Draft EIR, the proposed rezoning of up to 72 sites throughout Placer County to RM30 would increase the number of sites available for residential development within the County, which would be expected to increase population in the area if future residential projects are developed on any number of the rezone sites. By 2040, it is projected that the population of Placer County will be over 500,000 residents, pushing demand for new housing. It is estimated that the maximum number of 7,053 new multi-family units would increase the current County population by approximately 4.5 percent. While the proposed project could result in an increase in population as compared to the current population of the County, the population is already anticipated to grow, and the proposed project is intended to provide additional housing to serve existing and future residents of the County. Overall, the County's Housing Element is intended to accommodate anticipated growth and facilitate the development of new housing to meet the County's RHNA obligation share. As such, the population growth caused by the development of up to 7,053 new housing units would not be unplanned; rather, it is specifically being planned for through the identification and evaluation of suitable sites for development.

Response to Comment 273-12

Please see Response to Comment 273-1, above. In addition, as discussed under Impact 10-1 in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, Placer County Fire Department personnel confirmed in correspondence with the County that the existing fire stations that would serve and are located proximate to the rezone sites would be adequate to serve the proposed rezone sites.

Response to Comment 273-13

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 274

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:11:51 AM

From: Lisa McGlone <lisaa_on@hotmail.com>
Sent: Friday, March 8, 2024 3:07 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

274-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to

274-1 cont.

find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Sincerely,
Lisa McGlone

LETTER 274: LISA MCGLONE

Response to Comment 271-1

Please see Responses to Comment Letter 62.

Letter 275

From: Rosanne McHenry
To: Placer County Environmental Coordination Services
Subject: Remove Sites 71 and 72 from the Placer Rezone List
Date: Tuesday, February 20, 2024 10:14:23 PM

We were advised to forward messages to you regarding the upcoming EIR meeting on Feb 22.

275-1

Please see my forwarded email below regarding the Placer Rezone proposed sites 71 and 72. While we are opposed to all of this proposed rezoning for high density development, sites 71 and 72 will directly impact the rural character of our neighborhoods. Noise, increased traffic, auto emission pollution, and impacts on already stressed infrastructure will become serious issues if this moves forward.

Begin forwarded message:

From: Rosanne McHenry <rosanne54@sbcglobal.net>
Date: February 17, 2024 at 4:48:29 PM PST
To: kkedinge@placer.ca.gov
Cc: Jordan Cathy <cathy.jordan22@gmail.com>, Bob Jordan <bobjordan777@gmail.com>, Horti <hihorti@sbcglobal.net>
Subject: Remove Sites 71 and 72 from the Placer Rezone List

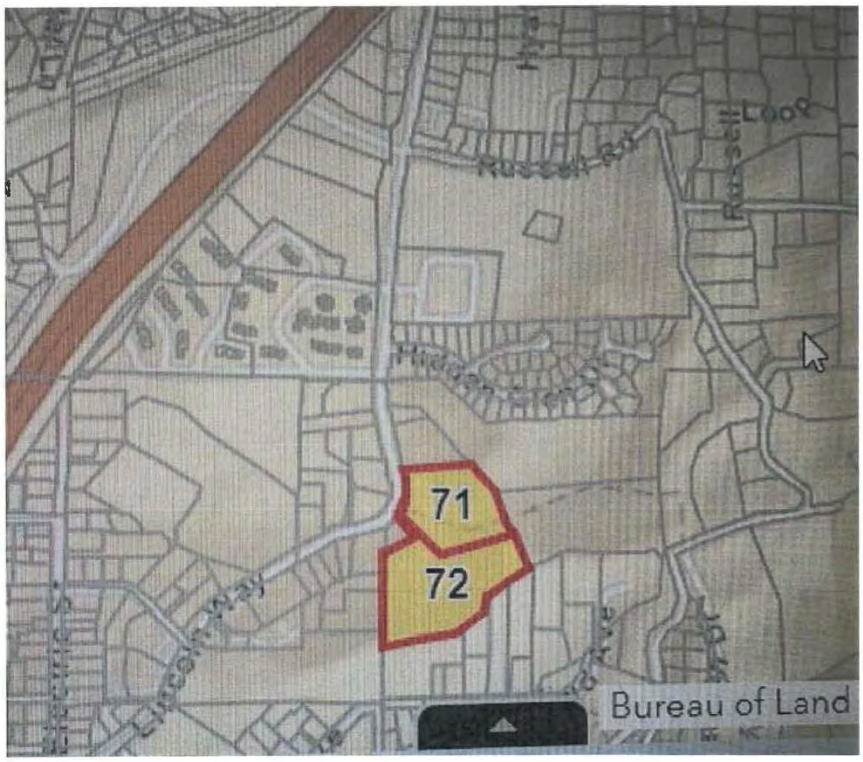
275-2

Sites 71 and 72 should be removed from the Placer Rezone list. There is already a huge issue with traffic in this area. There are already several other high density housing sites in this area, and traffic infrastructure can't begin to accommodate any further high density development. Currently the traffic congestion, noise, and exhaust fumes from hundreds of vehicles per hour are all at unbearable levels. Adding more units will only make an already miserable situation worse.

This are is right near Alta Vista School and a semi-rural area. There is no logical reason why these areas should be developed into high density housing for any reason. There are plenty of other areas outside the city limits in and beyond North Auburn where there is space and infrastructure to accommodate.

Again, I would beg the question: Why has Auburn been targeted with a huge share of potential rezone sites? We came to this area 44 years ago to get away from the noise and traffic of urban areas. We did not create new housing; we bought a vintage home and restored it. We came here for the rural value. We did not come here to see our hometown carved up into slices of jam-packed development. Please remove these sites from the list.

275-2
cont.



<1708217261733blob.jpg>

LETTER 275: ROSANNE MCHENRY

Response to Comment 275-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

It should also be noted that Saxelby Acoustics reviewed roadway volumes provided within the TIA for a total of 140 roadway segments and determined that only 15 could be subject to traffic volume increases of greater than 30 percent. Daily traffic increases of 30 percent would result in a maximum noise level increase of 1.2 dBA, an imperceptible change and below the strictest FICON standard (1.5 dBA) for determining impact significance. Therefore, the Noise Assessment focuses on roadway segments where traffic is predicted to increase by 30 percent, or more.

Lincoln Way, south of Russell Road, is not one of the 15 segments identified for further study.

In addition, with regard to "auto emission pollution", the Draft EIR includes an analysis of localized CO emissions. Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. High levels of localized CO concentrations are only expected where background levels are high, and traffic volumes and congestion levels are high. As stated on page 4-50 of the Draft EIR, according to modeling performed for Rezone Site #26, which, as shown in Table 3-2 of this EIR, is the largest rezone site, maximum buildout of the site at 30 units per acre would result in maximum unmitigated mobile source CO emissions of 131 lbs/day (see Appendix F of the Draft EIR), which would be substantially below the 550 lbs/day screening threshold used by PCAPCD. Because Rezone Site #26 is the largest rezone site, mobile source CO emissions generated by maximum buildout of any other rezone site would be less than what would be generated by vehicle traffic associated with Rezone Site #26. Therefore, the Draft EIR determined that the proposed project would not generate localized CO emissions that would contribute to an exceedance of AAQS and/or expose sensitive receptors to substantial concentrations of localized CO.

Response to Comment 275-2

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, as well as Responses to Comments 2-12, 2-14, and 174-2.

Letter 276

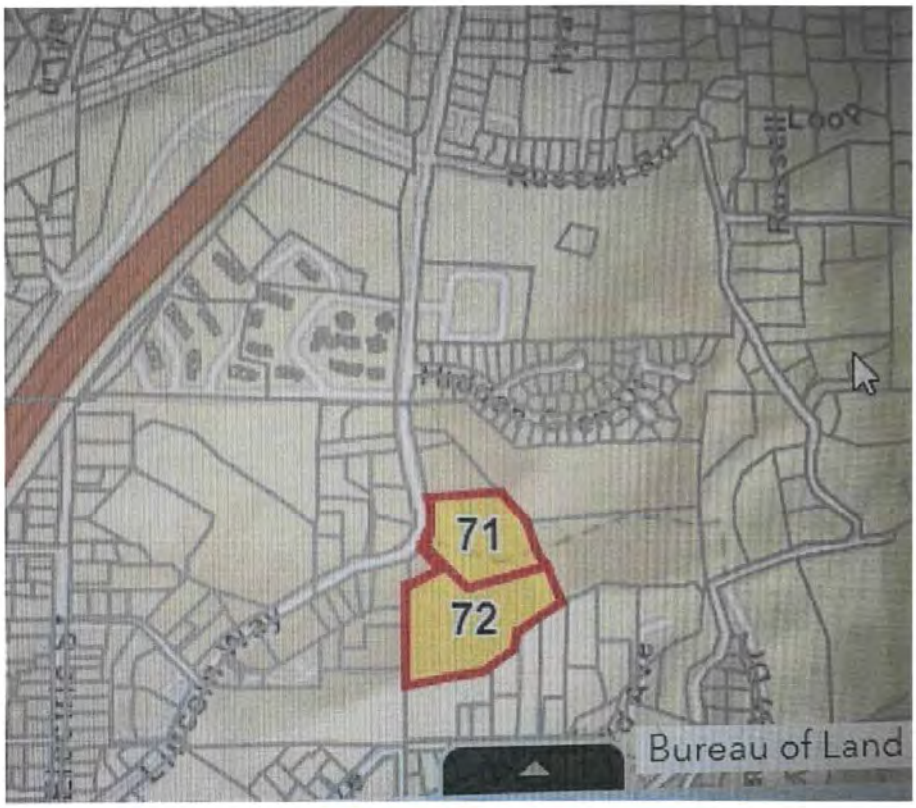
From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Remove Sites 71 and 72 from the Placer Rezone List
Date: Tuesday, February 20, 2024 9:38:03 AM

From: Rosanne McHenry <rosanne54@sbcglobal.net>
Sent: Saturday, February 17, 2024 4:48 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Jordan Cathy <cathy.jordan22@gmail.com>; Bob Jordan <bobjordan777@gmail.com>; Horti <hihorti@sbcglobal.net>
Subject: Remove Sites 71 and 72 from the Placer Rezone List

276-1 Sites 71 and 72 should be removed from the Placer Rezone list. There is already a huge issue with traffic in this area. There are already several other high density housing sites in this area, and traffic infrastructure can't begin to accommodate any further high density development. Currently the traffic congestion, noise, and exhaust fumes from hundreds of vehicles per hour are all at unbearable levels. Adding more units will only make an already miserable situation worse.

276-2 This are is right near Alta Vista School and a semi-rural area. There is no logical reason why these areas should be developed into high density housing for any reason. There are plenty of other areas outside the city limits in and beyond North Auburn where there is space and infrastructure to accommodate.

276-3 Again, I would beg the question: Why has Auburn been targeted with a huge share of potential rezone sites? We came to this area 44 years ago to get away from the noise and traffic of urban areas. We did not create new housing; we bought a vintage home and restored it. We came here for the rural value. We did not come here to see our hometown carved up into slices of jam-packed development. Please remove these sites from the list.


Russell Rd
Loop
71
72
Bureau of Land

LETTER 276: ROSANNE MCHENRY

Response to Comment 276-1
Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, as well as Responses to Comments 2-12, 2-14 and 174-2.

Response to Comment 276-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 276-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 277

From: Alexis McIntire
To: Placer County Environmental Coordination Services
Subject: No rezone on Baseline please!!!
Date: Monday, March 18, 2024 4:56:42 PM

He'll,

277-1

I have lived off Baseline on Longview Drive for 7 years. We moved from San Diego to be closer to family and live in what I remembered from my childhood as a more rural area. Naturally, Roseville has grown over the years. However, we've always appreciated our area of Roseville as preserving a bit of a Rural feel with all of the larger lots and farmland across the street from us. Sadly, with development, more people and more wealthy developers, moving into our area, we are quickly losing what we used to cherish of this area of town. Building more apartment complexes in our area will completely change the dynamic and feel at our neighborhoods and possibly compromise the safety of our children. And obviously it goes without saying that baseline is already feeling like a small freeway with all the development off of fitment and Watt. Please see below for more reasons why we oppose this development. Thank you for your consideration..

277-2

The DEIR for the proposed Placer County high density housing is flawed for many reasons. In an **attempt to rectify the problems created by the fact that the county has not made the new developments within the county over the past 20 years meet their 10% low-incomehousing requirement (per county resolution),**they are willingly ignoring the massive problems created by their proposed rezoning with the explanation, "It is housing the probably won't be built anyway because most developers don't want to build that type of housing as it is not cost effective for them." **If the plan is to not build such housing, then the logic works well to purposely put that zoning of lands that are not feasible to build upon. If that is not the plan, then the following environmental impacts can not be ignored.**
Specifically highlighted here are proposals in three areas of the county. Two of which I am personally familiar and one that I have only become acquainted with over the past 3 weeks in listening to testimony given by individuals in those areas given at Board of Supervisor and Planning Commission meetings.
The **four proposed sites (7, 8, 9, & 10) within the Dry Creek Community** have multiple flaws-with some of the problems with

277-2 cont.

each site listed individually—which is part of the problem with **the report as it does not cover each site individually** but, as was **stated by the county planners (and a supervisor), is "only a broad statement for the county and when a specific proposal comes in, then those specific issues will be mitigated.**" This would be after the rezoning has already taken place and the wheels have been set in motion to attempt to build high-density housing in an area that should not have it. **Broadly speaking, however, all of these sites are covered by finite county resources (Cal Fire, Placer County Sheriff)** which are extremely limited in time response and will endanger the lives of those who reside here as a larger and larger population is forced into this small area. **All of these proposed sites are surrounded by long-standing 1-2 acre minimum parcels** whose residents are on **wells and septic systems and rely on the ground water** which is **being depleted** by the **sinking of large wells by the city of Roseville**—potentially causing these long established small wells to go dry or be contaminated by infiltration of contaminants identified years ago from the nearby shut down air force base. And the addition of these long-established rural properties to city water may force these agricultural parcels, many of which have livestock, to not be able to afford to keep their properties properly watered not only for the livestock but also for fire mitigation. **All of these parcels (7, 8, 9, & 10) are currently zoned agricultural/low density housing** which is not only in keeping with the lifestyle of the residentsalso **allows for enough open space to provide somewhat for the replenishing of the underground aquafers which feed the area**-something which is currently threated by the encroaching city paving and would be further exacerbated by the paving required for high-density housing. And all of these proposed **sites feed the local elementary school district (Dry Creek Elementary**) and that **school district was never consulted about the impact** to the local school system. The high school district (Roseville High School district) may also not have been contacted.

In addition to the above-mentioned problems, **lot 7 (Vineyard Road)** is in a **flood plain** making it highly unlikely to be able to be built upon—at least for high density housing. The **dry creek bed** that runs through this property is the **flow for areas connected to lot 8** and **any restriction of flow through this area risks the flooding of houses near area 8 (East**

277-2 cont.

Drive). This **drainage would also eventually flow into Dry Creek** and potentially threaten the habitat there (along with the current wildlife that live within this parcel). Additionally, this is directly **adjacent on one side to a new development** that is being built in which the residents were unaware that this high-density housing rezoning was being proposed. On the **other side, it is surrounded by a large tract of agricultural land that then borders smaller rural housing** again with landowners who have **wells, septic systems and livestock**.

Lot 8 (East Drive AKA The Strawberry field) is also currently **zoned agricultural/low density housing**. It serves the local community by providing fresh fruit and vegetables. It is the **start of the flow area for drainage from the surrounding community down to lot 7 and away**. In the past, additional drainage from the city of Roseville (across Baseline) has caused backup of water across the lower parcels and creating flooding havoc for properties near to East Driver. **All lots adjacent to this proposed rezoning are 1-2 acre minimums (several of which have livestock or bees).** At least one property bordering this **lot had their well run dry in recent years** and they were **unable to redrill a well because of the flood plain issue.** Another lot directly adjacent to it has **goats** which have been known to escape their pens. On East Drive, Carol Lane and Central (the country roads sitting right beside this proposed site) has **small country roads without sidewalks or street lights** on which people **ride horses and walk their dogs** around the block. The **area directly connected** to it has **over 30 senior citizens who have lived in this community for 30-80 years**. Suddenly **brining in high-rise, high-density apartment buildings would be a total destruction of their community on numerous levels**.

Lots 9 & 10 are **directly across from an elementary school** (K-8) which currently is at capacity. It also sits on a **rural two-lane road**which has **numerous accidents.** It is also **served by the county sheriff's office** and has had **problems with response times in emergency situation**s. This site also sits almost adjacent to the local creek (Dry Creek) which has had flooding issues but runoff from the **additional paving required by an apartment complex could pose toxic runoff problems into said creek**. The additional **traffic congestion** caused by this development on that **two-lane road would be detrimental to land owners farther up the road.**

Moving out of the Dry Creek area, the proposal to put apartments

277-2 cont.

in the **Sheridan area** is flawed for multiple reasons. First, the lack of resources such as **fire and police protection** (served by the county sheriff). Second, the **lack of access to shopping** (there is only a small convenience store in town and the nearest availability of large-scaleshopping is more than 15 miles away). There are also **not local jobs and there is not access to any regional transit.**

It needs to be stated that most of these area properties that the County has specifically pursued—not a developer pursuing the County for a rezone—except it seems for one property in **Auburn** in which the **developer is wanting to put luxury apartments** into an area near a ravine that was previously not zoned for apartments. **If this develop goes in for luxury apartments, it seems that it would not meet the purpose of this rezoning proposal which is to find places for low-income, high-density housing—thus causing the County to seek other places for those units.**

As you should be able to see, **the overall DEIR submitted by Placer County is flawed on multiple counts and needs to be sent back for further review of individual sites** if the goal is to make a plan that works and not destroy existing communities.

Please say no to rezoning our precious strawberry field and farm land off Baseline road.

Respectfully,
Alexis McIntire, RN, BSN

LETTER 277: ALEXIS MCINTIRE

Response to Comment 277-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 277-2

Please see Responses to Comment Letter 76.

Letter 278

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning sites 71 and 72 (opposed)
Date: Friday, March 8, 2024 8:47:53 AM

-----Original Message-----
From: Keith Mckee <1classicmotors@gmail.com>
Sent: Thursday, March 7, 2024 11:22 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Rezoning sites 71 and 72 (opposed)

278-1 Please DONT allow the rezoning of sites 71 and 72 in placer county!
Sent from my iPhone

LETTER 278: KEITH MCKEE

Response to Comment 278-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 279

From: shauna mckinney
To: Bonnie Gore; Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Kally Kedinger-Cecil; Frank Udvarhelyi; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Subject: Purposed Re-zone for low income housing in Granite bay Ca
Date: Friday, March 15, 2024 5:09:55 PM

Hello,

279-1

It has come to my attention that you are planning a re-zone for the lot at 8989 Auburn Folsom Rd in Granite Bay.

As a resident and business owner in the community, this is very alarming.

Apparently the idea is to rezone this area for a cluster of apartments for low income people?

This lot is right next to Cavitt Middle school and backs up to the state park at Folsom lake.

Jamming a bunch of low- income people in an area that has been deliberately low density seems ridiculous.

Surely there's a lot somewhere in a commercial or already high -density area that this could be built on instead?

Plus I have heard that the proper environmental impact studies are not being done in advance?

This area is a nature preserve and that lot has a creek that runs through it...

More time and consideration needs to be put in to this.

The impact on our community would be devastating.

Please consider the suitability of this lot and the effects on not only the environment but public safety before you push this agenda through.

Thank you,
Shauna Frost

LETTER 279: SHAUNA FROST MCKINNEY

Response to Comment 279-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. In addition, it is noted that an EIR for the proposed project has been prepared. Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 280

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Fwd:I am writing this text to you to inform you th...
Date: Tuesday, February 20, 2024 9:16:38 AM

-----Original Message-----
From: 5303200628@vtext.com <5303200628@vtext.com>
Sent: Saturday, February 10, 2024 2:05 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fwd:I am writing this text to you to inform you th...

280-1

Fwd:I am writing this text to you to inform you that we are very concerned about the proposed project to build very low income/Homkkedinge@placer.ca.gov eless Housing at the intersection of Bell Rd and New Airport rd in North Auburn. We had our home built in the Sullivan Ranch neigkkedinge@placer.ca.gov hborhood in 1996 and love it here. We don't want our property values to drop due to homeless people walking thru our neighborhoodkkedinge@placer.ca.gov . Please reconsider building this project in our area. Thanks. Art & Margarete McMahan. 530-320-0628.

LETTER 280: MARGARETE MCMAHAN

Response to Comment 280-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 281

From: dolores mcsweeney
To: Placer County Environmental Coordination Services
Subject: Just stop it! No on 71 and 72
Date: Thursday, March 14, 2024 12:37:05 PM

281-1

It's right there facing the canyon! Sloping downward!

What if there's a wildfire? That area had a fire in 2021 and this area had to quickly evacuate. Please do your homework and come to your senses.

DoloresMcSweeney
Huntley Ave
Auburn

Sent from my iPhone

LETTER 281: DOLORES MCSWEENEY

Response to Comment 281-1

Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, potential impacts related to fire protection services, wildfire, and emergency evacuation are evaluated in Chapter 10, Fire Protection and Wildfire, of the Draft EIR. Specifically, as discussed in Impact 10-2, the proposed project would not substantially impair adopted emergency response plans or emergency and a less-significant impact would occur. The commenter's emergency evacuation concerns are noted by the County. It is also noted that the Local Transportation Analysis (LTA) prepared for the proposed project by Fehr & Peers determined the LOS of Lincoln Way, south of Russell Road, would be considered acceptable with the addition of project traffic (Table 5 of LTA). In addition, please see Responses to Comment Letter 174.

Letter 282

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Stop!!!! 71 and 72
Date: Monday, March 11, 2024 10:33:46 AM

-----Original Message-----
From: dolores mcsweeney <metroman52@att.net>
Sent: Sunday, March 10, 2024 3:41 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Stop!!!! 71 and 72

282-1 Go build your intense housing somewhere else. This is right near the canyon! Are you trying to ignore the obvious? Are you getting an exemption for homeowner's insurance!

Leave us and our precious wildlife alone.

Dolores McSweeney
Huntley Avenue
Auburn

Sent from my iPhone

LETTER 282: DOLORES MCSWEENEY

Response to Comment 282-1

Please see Response to Comment 281-1.

Letter 283

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Richard Meloniau. I am a Placer County resident with an address at 7595 Woodborough Dr. Granite Bay, CA 95746

283-1

In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

In addition, I am writing in support of the letter written by Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024. I respectfully request the Board consider the concerned expressed therein as an extension of my own opinion.

Thank you for your time,

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Brenda Melconian. I am a Placer County resident with an address at 7595 Woodborough DR. Granite Bay, CA 95746

283-2

In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

In addition, I am writing in support of the letter written by Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024. I respectfully request the Board consider the concerned expressed therein as an extension of my own opinion.

Thank you for your time,

Brenda Melconian

LETTER 283: RICHARD MELCONIAN AND BRENDA MELCONIAN

Response to Comment 283-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 283-2

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 284

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Richard Melconian. I am a Placer County resident with an address at 7595 Woodborough Dr. Granite Bay, CA 95746

284-1 In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

In addition, I am writing in support of the letter written by Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024. I respectfully request the Board consider the concerned expressed therein as an extension of my own opinion.

Thank you for your time,

Richard Melconian

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Brenda Meleonian. I am a Placer County resident with an address at 7595 Woodborough Dr. Granite Bay, CA 95746

284-2

In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

In addition, I am writing in support of the letter written by Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024. I respectfully request the Board consider the concerned expressed therein as an extension of my own opinion.

Thank you for your time,

Brenda Meleonian

LETTER 284: RICHARD MELCONIAN AND BRENDA MELCONIAN

Response to Comment 284-1
Please see Response to Comment 283-1.

Response to Comment 284-2
Please see Response to Comment 283-1.

Letter 285

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Dry Creek Rezoning - Please Stop!
Date: Tuesday, March 19, 2024 10:56:20 AM
Attachments: Outlook-wlcaol3i.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:06 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Dry Creek Rezoning - Please Stop!

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Lisa Mendenhall <lisam.mendenhall@gmail.com>
Sent: Saturday, March 2, 2024 5:52 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>; Landon Wolf <LWolf@placer.ca.gov>
Subject: Dry Creek Rezoning - Please Stop!

Dear Supervisor Gore and Members of the Planning Department,

285-1

I have lived in the Dry Creek Community for 20 years. We chose our home in Dry Creek because of the rural setting, large lots, excellent school district and proximity to all the necessities in West Roseville. We raised all three of our kids here, and are proud to be part of this community. I am writing to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre, specifically sites 7, 8, 9 and 10. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the

285-1 cont.

proposal for the following reasons:

285-2

The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear. The County specific plan has been encroaching on Dry Creek for years. Morgan Creek, Morgan Greens were approved with strong opposition. There were traffic mitigation measures put in place to appease the residents. However, the traffic diverted at Woodcreek Oaks and Baseline was removed. Our beautiful single lane bridge was replaced with the requirement that it needed to be raised to comply with flood planning. Bike lanes were included. Then Creekview Ranch School was built, further taking away our rural character. The traffic the school created backs up beyond Vineyard on the North side and all the way to PFE on the South side. Walking /bike paths were extended from the school all the way to Baseline. I truly believe the bridge and bike-paths were a prelude to the County already knowing they were going to push low income/high density projects in the future. Then the long line of housing development infill that everyone was opposed to. We stood up and told you at the meetings that our community was against these projects, but you said these were all approved years ago. And now here comes rezoning for future apartment complexes. One could think these events were purposefully concocted to destroy our rural way of life.

285-3

There is an enormous Infrastructure strain already, that you would be further exasperating. Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans. In addition, our lone fire station is not equipped to provide services for such a huge increase in population. You are putting all of the residents who have lived in the community for decades at risk of receiving less than adequate care if/when the need arises.

285-4

Regarding the submitted Environmental Impact study. I do not think the study accurately reflects what is actually occurring within our community. High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

285-5

The rural roads in Dry Creek are not built to accommodate high traffic volumes. Looking at the path carved out for access to amenities by biking or walking down Cook Riolo to Baseline and the East towards The Brickyard Shopping Center is unrealistic. People inherently take the shortest path and that is reflected in foot and bike traffic on Vineyard. There have been several Hit and Run accidents to include a fatality just last week. Lack of sidewalks is part of the rural character of our community as well as low light pollution. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

285-6

Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services. The local fire station is not adequately staffed to support the existing housing, let alone the upcoming future developments. There are not adequate Sheriff patrols as they are spread thin as well.

285-7

There are many other viable places for low income/ high density rezoning/apartments. Places

285-7 cont.

that are closer to commercial areas more in alignment with a high density setting. Cincinnati Avenue immediately comes to mind. I understand the need for affordable housing in our region, but **I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.**

285-8

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning. Please listen to the concerns your constituents you represent have and stop this rezoning.

Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely,

Lisa Mendenhall

LETTER 285: LISA MENDENHALL

Response to Comment 285-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 285-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 285-3
The project's potential impacts related to utilities infrastructure are addressed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project. See also Response to Comment 81-3 regarding sewer concerns, and note that any future residential development on rezone sites within the Dry Creek area would be required to connect to public water, supplied by the Placer County Water Agency (PCWA), which, according to Table 5 of the Initial Study (Appendix A of the Draft EIR), has ample water supplies available to serve reasonably foreseeable future development during normal, dry, and multiple dry years through 2040.

In addition, as discussed under Impact 10-1 in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, Placer County Fire Department personnel confirmed in correspondence with the County that the existing fire stations that would serve and are located proximate to the rezone sites would be adequate to serve the proposed rezone sites. Rezone sites in Dry Creek would be served by Dry Creek Station 100, located at 8350 Cook Riolo Road. Furthermore, a new fire station is planned to be developed as part of the Placer Vineyards Specific Plan.

Response to Comment 285-4
Potential impacts to air quality and GHG emissions are addressed in Chapter 4, Air Quality and GHG Emissions, of the Draft EIR. In addition, potential impacts to biological resources, including wildlife, are addressed in Chapter 5, Biological Resources, of the Draft EIR. Please also see Master Response 2 – Social and Economic Impacts.

Response to Comment 285-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 285-6
Please see Master Response 1 – Non-EIR/Administrative, Master Response 6 – Impacts to Local Schools, and Response to Comment 285-3, above.

Response to Comment 285-7
Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 3 – County-Owned Sites.

Response to Comment 285-8
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 286

From: Karen Fraser-Middleton
To: Placer County Environmental Coordination Services
Subject: Comment Housing Element Rezone
Date: Monday, March 11, 2024 11:26:19 AM

3-11-24
RE: Placer County High Density Rezone in Penryn on Penryn Rd
To whom it may concern:

286-1

I am very concerned and oppose Placer County's plan to rezone parcels 13, 17 and 18 on Penryn Rd. and Hope Rd. in Penryn listed on your proposed rezone map for high density housing.
The high density housing proposed is out of character for rural Penryn that is mostly comprised of multiple acre farms. There is not the infrastructure to support a drastic influx of population. Traffic is already an issue and there are no transit options. There are limited resources to support dense housing. There is also a major negative impact on the school district from a huge bump in population all at once. There are no support services for low-income residents in the immediate area.
This plan is a misguided strategy to meet state housing requirements with high density in-fill housing in a rural area of Placer County. Dropping high density housing into the rural community of Penryn appears to be an attempt at a quick fix to a decade long problem. This plan to win funding is not a win for the community. I oppose this plan to rezone parcels 13, 17 and 18 on Penryn Rd. and Hope Rd. and believe it would have major negative repercussions for the rural community of Penryn and surrounding towns.
The lack and high cost of housing is a problem and I appreciate the county looking for ways to address this issue. Planned communities with suitable infrastructure are preferable to high density infill that doesn't fit with the surrounding community. I would hope that Placer County staff and elected officials would look for better ways to supply housing and preserve the quality of life.
Thank you for your consideration.
Sincerely, Karen Fraser-Middleton

Karen Fraser-Middleton
PO Box 507
Loomis CA 95650
Karen@marketingaction.com

LETTER 286: KAREN FRASER-MIDDLETON

Response to Comment 286-1

Please see Master Response 1 – Non-EIR/Administrative, Master Response 2 – Social and Economic Impacts, and Master Response 6 – Impacts to Local Schools.

Letter 287

March 12, 2024

Mr. Chris Pahule, Planning Director
Ms. Kally Kedinger-Cecil, Senior Planner

Placer County Planning Department
3091 County Center Drive
Auburn, CA 95603

Subject: Rezoning Site #71, APN 054-290-064-000, and Site #72, APN-054-290-065-000
85 Lincoln Way, Auburn, CA 95603

Dear Mr. Pahule and Ms. Kedinger-Cecil,

287-1

My wife, Cathy, and I are writing this letter in support of the March 12, 2024, letter from Eric and Paula Peach regarding the rezoning of the subject parcels. Overall, we agree with the Peach's comments, but our primary concern is road safety. This part of Lincoln has a hidden curve that has proven to be dangerous. Our neighbor's accident was cited in the Peach letter. We have driven this portion of the road for 15 years and had some narrow escapes until December 20, 2023, when a driver lost control on the wet curve, crossed over into my lane and totaled my car. Absent my car, the driver was heading straight to the empty house at the end of the curve. It's bad enough having the current apartment buildings adjacent to the curve but adding more high density housing will only make ingress and egress more dangerous.

Therefore, for the safety of our neighborhood, we urge you not to approve high density housing for these two parcels.

Thanks for your consideration.

Jeff and Cathy Mikles
425 Olive Orchard Dr., Auburn, CA 95603

Cc:

Auburn City Council
Placer County Board of Supervisors

LETTER 287: JEFF AND CATHY MIKLES

Response to Comment 287-1

Please see Master Response 4 – Traffic Safety, as well as Responses to Comments 2-12, 2-14, and 174-2.

Letter 288

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Please Preserve our Granite Bay Community & Reject Rezone in front of Cavitt Jr High School from RM30- Against Property Lots 25 & 26 from Rezoning
Date: Friday, February 23, 2024 9:11:56 AM

From: MILLANE, CHRISTINA M <cg2362@att.com>
Sent: Thursday, February 22, 2024 3:54 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Suzanne Jones <SuzanneJones@placer.ca.gov>
Subject: Please Preserve our Granite Bay Community & Reject Rezone in front of Cavitt Jr High School from RM30- Against Property Lots 25 & 26 from Rezoning

Hello Kally,

288-1 I live in District 4 and I would like to voice my concerns. I did attend the meeting via Zoom today about Rezoning and feel that this is the most undesirable location for a 3 story low income housing unit. In front of a school, along a corridor that is already suffering from heavy traffic to add almost 350 units and to stream more cars in an area that cannot support that kind of infrastructure makes no sense. This area should be preserved for something that would support those residents living here and blend in aesthetically, environmentally and structurally. Single story type structures that will add value to the area not destroy the area by jamming people in an area that does not support that amount of people. In addition, the area is quite beautiful down the road with horse stables, and then Beales State Park. Oh and did I mention it's directly in front of Cavitt Jr High School, how can you build something there like this next to a highly rated school? No room for school drop offs or pickups, so then what?

288-2 I am aware low income housing is necessary, however I oppose property #25 & #26 on 8950 Auburn Folsom Road & 8989 Auburn Folsom. Property 25 can have as many as 51 units & next door Property #26 another 297 equating to about 350 units in front of Cavitt Jr High School. The idea of placing a low income complex in front of a well-established and highly rated school makes absolutely no sense.

288-3 Also, in the meeting it was stated anything over 10 acres was not considered, but #26 was over 10 acres but then reduced after the fact to 9.9 to accommodate the county demand not to mention the current landowner with monetary incentive who is by and large allowing those living here to be adversely impacted forever.

288-4 I'm also concerned that not one county property was ever considered for rezoning, why not? So instead of looking for areas that are suitable to these type of structures, that would not impact the community, the planners are targeting established areas with low income housing.

288-4 cont.

That makes no sense why county properties in more suitable areas were never considered.

288-5

So it makes sense to take well established residential areas and move low income, high rise, high density structures into that area even though it cannot accommodate them? And we who already live here have to adapt to an undesirable proposed plan? Explain why this ever got on the list, when I'm sure more suitable areas could be found. An extension should be proposed to give the county time to look at the county property inventory to come up with a better solution.

288-6

How was the idea of an already highly congested area have the ability to support a high density infrastructure and more that an additional 700 cars really looked at? I can't believe it was since I live in the area and this plan does not support the roads, traffic or infrastructure. I do not feel the environmental impact report considered this aspect. The traffic on Auburn Folsom is the main artery to get either to Douglas then to Highway 80 or down to Highway 50. The environment will be adversely impacted with this amount of additional cars since it's a heavily trafficked area. A spot rezone is not desirable to anyone who lives in a single family area, and to introduce unsightly high density property into an area that can't accommodate this is preposterous.

288-7

Has the children's learning been considered or the fact they are next to a low-impact development been of consideration? This is both unsafe to school children walking to and from school and unfair to parents driving to and from school. And puts not only unnecessary stress on people living in this community, but more people's lives at risk to squeeze too many people in an area that does not have the space to support them. Not only is this unfair to our community to consider this it goes against the nature of caring for children who need to be at school. The noise from construction and the congestion from so many cars in a small area that leads to roads designed for a smaller footprint, will lead to much adversity for many who live here. Increase road rage, which leads to violence, then the noise and toxins to so many in a small area. This impacts their health and is against the environment as well, how was this overlooked?

288-8

I think the reports of the biological, aquatic, riparian, environment impact of this needs to be made public and reviewed. In addition, I noticed you said no current housing development has been done in any area to support making the change in jurisdiction with this amount of units in a small area. So why are you planning to experiment here when logic will dictate this makes no sense that it will work out favorably to anyone. Isn't this a violation of planning to propose something of this nature that goes against what planners are supposed to consider?

288-9

We moved here to be in a safe, country feel environment and paid a lot of money to be in a this area, now you decide to change that for everyone by not considering the impact of placing a 3 or 4 story infrastructure in an area that is all single family homes and single story

288-9 cont.

businesses. This makes no sense. We love and adore Granite Bay and the community, but you will inflict pain on those who live here by changing the area and inflict pain on the children and families that drive to this area.
Isn't Placer County considerate of the impact of this? Can't they look at other locations that will not cause so much damage to the environment, people, habitat, and livelihoods of those living here.

288-10

A solutions is we can adapt to increasing ADU's in the area to help those who need more housing and provide incentives to residents who have the space or land that would support that. Not jamming 700 or more people into an area that is really designed to support less than a dozen homes or a few businesses.

288-11

In addition, these lots are next to a horse stable called Boarding on the Lake and next you have Beale's Point that families go to enjoy the trail on the lake. This atmosphere will disappear if you increase this with low income residents that will bring crime, and other city-like stresses to a well-established area and will disrupt this positive aspect of this area. And once it's changed it will destroy the lives of those who moved here and that is just not fair to our community.

288-12

I hope you reconsider not placing a high density unit next to a school, this is not the location for that type of structure.

I oppose large numbers of high density units built in an unsuitable location in an already congested area and near a school is not a safe idea.

Thank you for considering the residents who already live here. Please do the right thing and remove property 25 & 26 from being considered for RM-30.

Christina Millane

LETTER 288: CHRISTINA MILANE

Response to Comment 288-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. This comment states concerns about children walking to/from Cavitt Junior High School and students crossing a new driveway to the proposed project at Rezone Site #26. Refer to Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. Additionally, the County has secured grant funding to install a new enhanced crosswalk for pedestrians crossing Fuller Drive near Cavitt Junior High School. The grant funding is unrelated to the proposed project and will be installed whether or not Rezone Site #26 is rezoned as part of the proposed project. That new crosswalk could alleviate the concerns raised by the commenter.

Response to Comment 288-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 288-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 288-4
Please see Master Response 3 – County-Owned Sites.

Response to Comment 288-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 3 – County-Owned Sites.

Response to Comment 288-6
Please see Master Response 1 – Non-EIR/Administrative. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 288-7
Please see Master Response 1 – Non-EIR/Administrative, Master Response 4 – Traffic Safety, and Response to Comment 288-1.

With respect to construction noise, Placer County Code Section 9.36.030(A)(7) exempts noise sources associated with construction activities, provided that such activities occur between the hours of 6:00 AM and 8:00 PM, Monday through Friday (during daylight savings), 7:00 AM and 8:00 PM, Monday through Friday (during standard time), and 8:00 AM and 6:00 PM, Saturday. The exemption is provided on the basis that all construction equipment is fitted with factory-installed muffling devices and maintained in good working order. All noise-generating project construction equipment and activities are reasonably assumed to occur pursuant to Placer County

Code Section 9.36.030(A)(7) and would, thereby, be exempt from the applicable noise level criteria.

As discussed in Impact 7-3, the proposed project could generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Implementation of Mitigation Measure 7-2 would reduce the potential temporary noise impact. However, the effectiveness of the measure would vary from site to site and may not prevent ambient noise-level increases due to project construction from exceeding 5.0 dBA, the established threshold, relative to existing levels. This, however, may be achievable at Rezone Site #26, and would be determined at a later date should a residential development application be processed and reviewed by the County for the site. As discussed in Impact 7-2, the EIR conservatively concluded that the potential impact would remain significant and unavoidable.

It should be noted that Saxelby Acoustics reviewed roadway volumes provided within the TIA for a total of 140 roadway segments and determined that only 15 could be subject to traffic volume increases of greater than 30 percent. Daily traffic increases of 30 percent would result in a maximum noise level increase of 1.2 dBA, an imperceptible change and below the strictest FICON standard (1.5 dBA) for determining impact significance. Therefore, the Noise Assessment focuses on roadway segments where traffic is predicted to increase by 30 percent, or more.

Auburn Folsom Road is not one of the 15 segments identified for further study.

Response to Comment 288-8

Please see Master Response 1 – Non-EIR/Administrative. In addition, potential impacts to biological resources, including aquatic resources and riparian areas, are addressed in Chapter 5, Biological Resources, of the Draft EIR. Please also see Responses to Comments 52-2.

Response to Comment 288-9

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 3 – County-Owned Sites.

Response to Comment 288-10

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 288-11

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 288-12

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 289

From: MILLANE, CHRISTINA M
To: Placer County Environmental Coordination Services
Subject: Please Preserve our Granite Bay Community & Reject Rezone in front of Cavitt Jr High School from RM30- Against Property Lots 25 & 26 from Rezoning
Date: Thursday, February 22, 2024 4:37:46 PM

Hello,

I live in District 4 and I would like to voice my concerns. I did attend the meeting via Zoom today about Rezoning and feel that this is the most undesirable location for a 3 story low income housing unit. In front of a school, along a corridor that is already suffering from heavy traffic to add almost 350 units and to stream more cars in an area that cannot support that kind of infrastructure makes no sense. This area should be preserved for something that would support those residents living here and blend in aesthetically, environmentally and structurally. Single story type structures that will add value to the area not destroy the area by jamming people in an area that does not support that amount of people. In addition, the area is quite beautiful down the road with horse stables, and then Beales State Park. Oh and did I mention it's directly in front of Cavitt Jr High School, how can you build something there like this next to a highly rated school? No room for school drop offs or pickups, so then what?

I am aware low income housing is necessary, however I oppose property #25 & #26 on 8950 Auburn Folsom Road & 8989 Auburn Folsom. Property 25 can have as many as 51 units & next door Property #26 another 297 equating to about 350 units in front of Cavitt Jr High School. The idea of placing a low income complex in front of a well-established and highly rated school makes absolutely no sense.

289-1

Also, in the meeting it was stated anything over 10 acres was not considered, but #26 was over 10 acres but then reduced after the fact to 9.9 to accommodate the county demand not to mention the current landowner with monetary incentive who is by and large allowing those living here to be adversely impacted forever.

I'm also concerned that not one county property was ever considered for rezoning, why not? So instead of looking for areas that are suitable to these type of structures, that would not impact the community, the planners are targeting established areas with low income housing. That makes no sense why county properties in more suitable areas were never considered.

So it makes sense to take well established residential areas and move low income, high rise, high density structures into that area even though it cannot accommodate them? And we who already live here have to adapt to an undesirable proposed plan? Explain why this ever got on the list, when I'm sure more suitable areas could be found. An extension should be proposed to give the county time to look at the county property inventory to come up with a better solution.

How was the idea of an already highly congested area have the ability to support a high density infrastructure and more that an additional 700 cars really looked at? I can't believe it was since I live in the area and this plan does not support the roads, traffic or infrastructure. I do not feel the environmental impact report considered this aspect. The traffic on Auburn Folsom is the main artery to get either to Douglas then to Highway 80 or down to Highway 50. The environment will be adversely impacted with this amount of additional cars since it's a heavily trafficked area. A spot rezone is not desirable to anyone who lives in a single family area, and to introduce unsightly high density property into an area that can't accommodate this is preposterous.

Has the children's learning been considered or the fact they are next to a low-impact development been of consideration? This is both unsafe to school children walking to and from school and unfair to parents driving to and from school. And puts not only unnecessary stress on people living in this community, but more people's lives at risk to squeeze too many people in an area that does not have the space to support them. Not only is this unfair to our community to consider this it goes against the nature of caring for children who need to be at school. The noise from construction and the congestion from so many cars in a small area that leads to roads designed for a smaller footprint, will lead to much adversity for many who live here. Increase road rage, which leads to violence, then the noise and toxins to so many in a small area. This impacts their health and is against the environment as well, how was this overlooked?

289-1 cont.

I think the reports of the biological, aquatic, riparian, environment impact of this needs to be made public and reviewed. In addition, I noticed you said no current housing development has been done in any area to support making the change in jurisdiction with this amount of units in a small area. So why are you planning to experiment here when logic will dictate this makes no sense that it will work out favorably to anyone. Isn't this a violation of planning to propose something of this nature that goes against what planners are supposed to consider?

We moved here to be in a safe, country feel environment and paid a lot of money to be in a this area, now you decide to change that for everyone by not considering the impact of placing a 3 or 4 story infrastructure in an area that is all single family homes and single story businesses. This makes no sense. We love and adore Granite Bay and the community, but you will inflict pain on those who live here by changing the area and inflict pain on the children and families that drive to this area.
Isn't Placer County considerate of the impact of this? Can't they look at other locations that will not cause so much damage to the environment, people, habitat, and livelihoods of those living here.

A solutions is we can adapt to increasing ADU's in the area to help those who need more

housing and provide incentives to residents who have the space or land that would support that. Not jamming 700 or more people into an area that is really designed to support less than a dozen homes or a few businesses.

In addition, these lots are next to a horse stable called Boarding on the Lake and next you have Beale's Point that families go to enjoy the trail on the lake. This atmosphere will disappear if you increase this with low income residents that will bring crime, and other city-like stresses to a well-established area and will disrupt this positive aspect of this area. And once it's changed it will destroy the lives of those who moved here and that is just not fair to our community.

289-1 cont.

I hope you reconsider not placing a high density unit next to a school, this is not the location for that type of structure.

I oppose large numbers of high density units built in an unsuitable location in an already congested area and near a school is not a safe idea.

Thank you for considering the residents who already live here. Please do the right thing and remove property 25 & 26 from being considered for RM-30.

Christina Millane

LETTER 289: CHRISTINA MILANE

Response to Comment 289-1

Please see Responses to Comments 288-1 through 288-12.

Letter 290

From: jim miller
To: Placer County Environmental Coordination Services
Subject: Placer County rezoning Sheridan California
Date: Monday, March 18, 2024 9:59:59 PM

Attention:
Shirlee Herrington, Environmental Coordination Services,
To Whom it may concern,

290-1 In regards to the rezoning placer plans for Sheridan. The three story low income building will create an enormous negative impact on our small town with very limited resources. Our resources have already been stretched thin by the government pressure and loosening of regulations from the pandemic. It would be neglectful for the County to approve and dump this project in a rural town such as ours.

290-2 The report for resources was clearly misleading and had no real connection to access the town of Sheridan nor gave a clear indication to the obstacles of their suggested resources in the neighboring county. The fire department in Wheatland doesn't respond initially to any call 8n Sheridan. Nor does their police or ambulance. These services are located in a town inside another county. Wheatland is not part of Placer County, therefore services don't apply.

290-3 The current comparison report is not adequate because the town of Sheridan is like an island without public transportation, sidewalks or anyway to reasonably access the towns of Wheatland or Lincoln with any public transportation. We are bordered by highways. There is NO public transportation here. At one point an elderly woman who didn't have a vehicle was hitchhiking just to get groceries and laundry services in Lincoln.

290-4 We have a liquor store with limited items at astronomical prices to service the people headed to camp far west lake. The closest shopping for low income people would be the Walmart in Lincoln, 8 miles away.
There is no walking or bike path to the neighboring towns, Only Highways.

We lack other critical services, such as police, fire and hospital. It takes a minimum of 15 minutes or more for ambulance, fire or police to respond to the people that already live here. Adding more people with the same level of service would be ridiculous, the law enforcement, fire and other agencies would quickly be overwhelmed as well as negatively affecting our small community even more.

Our town and surrounding area contains zero infrastructure for increased low income pressures. Sheridan currently is impacted by squatters and drug users and other offenders overflowed from the recent pandemic loosening of laws and lack of law enforcement to currently patrol the town regularly. We currently have a trailer park for those that are in need of modified reduced price housing. There is no infrastructure to accommodate a RD-20 or RD-30 housing project.

The Sheriff is already heavily overstretched between the large area they cover and the casino issues.

290-4 cont.

Our firestation is volunteer and limited in coverage.

The park we do have for public use, is often used by vagrant squatters, drug users and a homeless man that uses the only portable restroom and the playground structure as a residence.

290-5

There are other infrustructure issues, such as, the location of the building and the imposing traffic hazzards to consider. To access the proposed building from the highway to the frontage road, there is less than a car length once you turn onto Riosa road, off the old highway 65/sheridan Lincoln blvd to turn onto that frontage road.
The proximity to the railroad tracks and train that often fly's through town at high speeds. There currently is no protection fencing and a potential hazard for any children living nearby. Also the hazards from the cars driving down the highway is approx 150 from the proposed building to the railroad and maybe 50 more feet to the highway from the railroad tracks. This could be a potential for any traffic hazards, accidents with high speed vehicles or train derailment issues. The building would be the tallest height around and potentially could impact the local farmers with the crop dusting and other small plane impacts that need to be studied.

290-6

The current status of the proposal does not effectively address concerns regarding lack of space for the building on a very small lot. The parking issues for this many people. How privacy for exsisting neighbors whose homes border this building will be affected. The access and maintenance plan of the current roads. The impact on the newer local businesses that are next door. The proposed design of the development does not meet the projected lower elevation of construction for the 2015 Sheridan community plan, nor does it complement the design of buildings in the neighborhood.

290-7

The next question is who is going to pay for all of these issues, upgrades, and additional resources? The people of Sheridan are not capable of withstanding this kind of impact on their already low income community, thats resources have already been stretched thin. The County should not be dumping people out in the rural area to meet a demand from the State. The County shouldn't be trying to rezone an area without tenative building plans already in place. This parcel should be considered ineligible for rezoning. Placer County has many, more appropriate locations suitable for this type of housing and people.

Thank you,

Jim Miller

Yahoo Mail: Search, Organize, Conquer

LETTER 290: JIM MILLER

Response to Comment 290-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 290-2
As detailed in Section XV, Public Services, of the Initial Study, increased demand for public services, such as fire and police protection services, attributable to the proposed project would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts.

Response to Comment 290-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 290-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

As discussed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project (attached as Appendix A to the Draft EIR), the existing infrastructure that is located within the vicinity of each rezone site is included in the Site Inventory Forms prepared for the proposed project (attached as Appendix C to the Draft EIR). As presented therein, existing water and sewer infrastructure is generally located in the immediate vicinity of the rezone sites. Such infrastructure would be used to provide water and sewer service to future development on the rezone sites. In addition, as detailed in Section XV, Public Services, of the Initial Study, increased demand for public services, such as fire and police protection services, attributable to the proposed project would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts.

Response to Comment 290-5
Please see Master Response 4 – Traffic Safety.

Response to Comment 290-6
Please see Master Response 1 – Non-EIR/Administrative.

Response to Comment 290-7
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 291

From: K Miller
To: Board Clerk; Placer County Environmental Coordination Services
Subject: Placer County Housing Rezoning Project - Sheridan, CA
Date: Monday, March 18, 2024 11:10:47 PM

To whom it may concern,

I have been following the progress of the potential Sheridan rezone sites, there is one currently still under consideration. I must say I was shocked to see Sheridan even being considered for a multi-family home rezone. Last year I looked through Placer County's updated General Plan for Sheridan, it specifically lays out that Sheridan is set to not have a density increase.

When choosing the properties for consideration, don't you take into consideration the General Plan designations? Sheridan (population of 1,279 as of 2023) does not have the infrastructure to accommodate a RD-20 or RD-30 housing project. The sewer infrastructure is very outdated and cannot accommodate 20-30 more homes.

We do not have 24/7 fire station, fire fighters have to come from Lincoln area.

No sidewalks, building site very close to train tracks with no secure fencing to protect children from accessing train tracks, trains go very fast through town.

No transportation system, no RT stops.

Traffic for this particular location should be studied before re-zone as it is a narrow two-lane small road.

Limited to any other resources, we only have a small convenient store with limited hours. No banking gas station, grocery store, etc.

291-1

The neighboring parcel is a burnt down historic building. This historic site next to the parcel in question has hazards that children could get into with no plans to update and improve the site.

Multi density housing would look completely out of place, there are no two-story buildings nearby.

There is no room for parking accommodations for 20-30 new homes Sheridan in a designated WUI zone (Wildlife Urban interface) and is more prone to quick moving fires. The town has historically burnt down twice.

In the past, the above limitations should make this parcel ineligible for rezone consideration I understand that Sheridan may grow at some point, but I feel that it is Placer counties duty to do it responsibly and not just throw multifamily homes into a rural community to satisfy your housing counts. Any Sheridan resident looking to rezone/build must satisfy all the counties requirements, the county should have to follow their own rules as well.

It has been my experience in the past that in order to get a rezone you must have tentative building plans approved first. Blanket rezoning without considering all elements of a specific project is reckless and irresponsible of the county. This is not something that should be rushed through to satisfy state requirements, especially in a small rural town that does not have a

291-1 cont.

single RD-5 or above (that I know of) besides possibly the small mobile home park.

Placer County is a large county that has an abundance of other towns/cities that would be more appropriate for a multi housing project. Please remove the Shendan site from your list of parcels that you have under consideration, it is out of place and unsupported at this time

Thank you.

Kaitlin Miller

LETTER 291: KAITLIN MILLER

Response to Comment 291-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Responses to Comments 290-1 through 290-7.

Letter 292

From: Islie45
To: Placer County Environmental Coordination Services
Subject: Housing element sites rezone project comment submission
Date: Monday, March 18, 2024 9:31:12 PM

Attention:
Shirlee Herrington, Environmental Coordination Services,
To Whom it may concern,

In regards to the rezoning placer plans for Sheridan. The three story low income building will create an enormous negative impact on our small town with very limited resources. Our resources have already been stretched thin by the government pressure and loosening of regulations from the pandemic. It would be neglectful for the County to approve and dump this project in a rural town such as ours.

The report for resources was clearly misleading and had no real connection to access the town of Sheridan nor gave a clear indication to the obstacles of their suggested resources in the neighboring county. The fire department in Wheatland doesn't respond initially to any call 8n Sheridan. Nor does their police or ambulance. These services are located in a town inside another county. Wheatland is not part of Placer County, therefore services don't apply.

The current comparison report is not adequate because the town of Sheridan is like an island without public transportation, sidewalks or anyway to reasonably access the towns of Wheatland or Lincoln with any public transportation. We are bordered by highways. There is NO public transportation here. At one point an elderly woman who didn't have a vehicle was hitchhiking just to get groceries and laundry services in Lincoln.

292-1

We have a liquor store with limited items at astronomical prices to service the people headed to camp far west lake. The closest shopping for low income people would be the Walmart in Lincoln, 8 miles away.
There is no walking or bike path to the neighboring towns, Only Highways.

We lack other critical services, such as police, fire and hospital. It takes a minimum of 15 minutes or more for ambulance, fire or police to respond to the people that already live here. Adding more people with the same level of service would be ridiculous, the law enforcement, fire and other agencies would quickly be overwhelmed as well as negatively affecting our small community even more.

Our town and surrounding area contains zero infrastructure for increased low income pressures. Sheridan currently is impacted by squatters and drug users and other offenders overflowed from the recent pandemic loosening of laws and lack of law enforcement to currently patrol the town regularly. We currently have a trailer park for those that are in need of modified reduced price housing. There is no infrastructure to accommodate a RD-20 or RD-30 housing project.

The Sheriff is already heavily overstretched between the large area they cover and the casino issues.

Our firestation is volunteer and limited in coverage.

The park we do have for public use, is often used by vagrant squatters, drug users and a homeless man that uses the only portable restroom and the playground structure as a residence.

There are other infrustructure issues, such as, the location of the building and the imposing traffic hazzards to consider. To access the proposed building from the highway to the frontage road, there is less than a car length once you turn onto Riosa road, off the old highway 65/sheridan Lincoln blvd to turn onto that frontage road.
The proximity to the railroad tracks and train that often fly's through town at high speeds. There currently is no protection fencing and a potential hazard for any children living nearby. Also the hazards from the cars driving down the highway is approx 150 from the proposed building to the railroad and maybe 50 more feet to the highway from the railroad tracks. This could be a potential for any traffic hazards, accidents with high speed vehicles or train derailment issues. The building would be the tallest height around and potentially could impact the local farmers with the crop dusting and other small plane impacts that need to be studied.

292-1 cont.

The current status of the proposal does not effectively address concerns regarding lack of space for the building on a very small lot. The parking issues for this many people. How privacy for exsisting neighbors whose homes border this building will be affected. The access and maintenance plan of the current roads. The impact on the newer local businesses that are next door. The proposed design of the development does not meet the projected lower elevation of construction for the 2015 Sheridan community plan, nor does it complement the design of buildings in the neighborhood.

The next question is who is going to pay for all of these issues, upgrades, and additional resources? The people of Sheridan are not capable of withstanding this kind of impact on their already low income community, thats resources have already been stretched thin. The County should not be dumping people out in the rural area to meet a demand from the State. The County shouldn't be trying to rezone an area without tenative building plans already in place. This parcel should be considered ineligible for rezoning. Placer County has many, more appropriate locations suitable for this type of housing and people.

Thank you,

Leslie Miller
5772 Camp Far West Rd
Sheridan, California
916-412-7228

LETTER 292: LESLIE MILLER

Response to Comment 292-1

Please see Responses to Comments 290-1 through 290-7, above.

Letter 293

From: Mary Miller
To: Placer County Environmental Coordination Services
Subject: Old Auburn. Rezone negative effect
Date: Friday, March 15, 2024 10:00:00 AM

Good Day,
We would strongly object to the change of zoning on Old Auburn between Sierra College and Cirby that would allow for multi housing and increasing the amount of traffic on a small stretch of land that is already burdened with heavy traffic due to the school and the cutting through as Sierra College backs up with the 50 to 80 trucks and cars. Additional traffic due to multi housing in this small stretch would create accidents, pollution of both smog and noise.

293-1

We have lived here 25 years and recognize that there is a need for growth. The traffic has grown and making this area more akin to LA during large parts of the day. We have seen condensed homes built as well as two senior living developments that impact Old Auburn. This proposed change would create unnecessary burdens to the existing population. We have already lost so much of the green areas in this section.

Please consider this request to not allow the zoning change.

Best Regards,

Mary Miller
3308 Castle Creek

LETTER 293: MARY MILLER

Response to Comment 293-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 294

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Dry Creek expansion
Date: Tuesday, March 19, 2024 10:58:26 AM
Attachments: Outlook-j0cf00lv.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:12 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Dry Creek expansion

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Rita D Miller <rmiller2368@icloud.com>
Sent: Saturday, March 16, 2024 11:36 AM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>
Cc: Robyn Dahlgren <RDahlgren@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Dry Creek expansion

294-1

I have lived in the Dry creek area since 2018. During this time I have had someone attempt to break into our home. We have had things stolen from our garden. Adding more housing in this jurisdiction that is separation from the rest of the county is going to be dangerous to the residents of our community. Placer County SO does not have present in the area.

The patrols units are lined up out side of Thunder Valley Casino. And if you were a young police officer why wouldn't you want to be near the action.

294-1 cont.

We have transient walking through Dry Creek after jumping off the trains. I have chased off three men from my yard. Finally had to remove chairs we had in our Gazebo.

So if you expand in the Dry Creek area who is going to protect the tax payers?

I can see our property values going down and people getting hurt because of poor response times.

Respectfully submitted

Rita and Michael Miller

Sent from my iPhone

LETTER 294: RITA MILLER

Response to Comment 294-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 295

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning in District 1
Date: Tuesday, March 19, 2024 10:58:13 AM
Attachments: Outlook-e5q0c55r.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:11 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Rezoning in District 1

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Toni Mirabelli <tonibelli2@yahoo.com>
Sent: Thursday, March 14, 2024 5:40 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Rezoning in District 1

Dear Representative Dahlgren,

295-1

I am in favor of rezoning and building more affordable housing.

This is a critical step toward reducing homelessness and ensuring housing for everyone.

Thank you for doing everything you can to ensure this rezoning and construction moves forward as quickly and safely as possible.

Antoinette Mirabelli
580 Oakborough Avenue
Roseville CA 95747

Yahoo Mail: Search, Organize, Conquer

LETTER 295: ANTOINETTE MIRABELLI

Response to Comment 295-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 296

From: Jeeno M
To: Placer County Environmental Coordination Services
Subject: Concerns Regarding Proposed Rezoning the Vineyard Area, Roseville, CA
Date: Wednesday, February 28, 2024 3:31:53 PM

To whom it may concern,

I hope this email finds you well. I am writing to express my deep concern regarding the proposed rezoning of properties, including the one where I have recently purchased a house, to the Residential Multifamily 30 (RM30) district - Vineyard Area in Roseville, CA.

While I understand the need for thoughtful urban planning and development, I believe that the implementation of the RM30 district in our neighborhood would not align with the existing character and needs of the community. Here are some reasons why I strongly urge the county not to move forward with this plan:

Density Discrepancy: The proposed minimum density of 20 dwelling units per acre and maximum density of 30 units per acre is significantly higher than the current density of our neighborhood. Such a dramatic increase in density could lead to overcrowding, strain on existing infrastructure, and a decline in quality of life for residents.

Impact on Traffic: The influx of additional residents due to higher-density development would inevitably lead to increased traffic congestion and parking challenges. Our neighborhood may not be equipped to handle such a surge in vehicular activity, potentially compromising safety and convenience for current residents.Recently, on the same road that is scheduled to be rezoned, (Brady lane) there was a hit and run that resulted in a death. I only foresee this to be the start of a bigger issue.

296-1

Community Character: Our neighborhood is currently characterized by single-family homes and a sense of spaciousness. Introducing multifamily developments with higher density could fundamentally alter the fabric of our community, impacting its aesthetic appeal and overall ambiance.

Infrastructure and Public Services: Higher-density development would place additional strain on existing infrastructure, including water and sewer systems, as well as public services such as schools and emergency response. It is crucial to ensure that these systems can adequately support any proposed changes in land use.

Property Values: There is a concern among current homeowners, myself included, that the introduction of multifamily developments in our neighborhood could negatively impact property values. Potential buyers may be deterred by the prospect of increased density and its associated challenges. I have recently purchased a home in the area after years of hard work and would hate to see the value of the neighborhood plummet due to new developments in the area.

Given these concerns, I respectfully urge the county to reconsider the proposed rezoning to the Vineyard area in Roseville. Instead, I

296-1 cont.

encourage the exploration of alternative solutions that prioritize sustainable development while preserving the unique character and livability of our neighborhood.

I would appreciate the opportunity to discuss this matter further and provide additional input if needed. Thank you for considering my perspective on this important issue.

Sincerely,

Jeeno Miranda
209-597-2383
8331 Pinot Grigio St
Roseville, CA

LETTER 296: JEENO MIRANDA

Response to Comment 296-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, Master Response 4 – Traffic Safety, and Master Response 6 – Impacts to Local Schools. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

The project's potential impacts related to utilities infrastructure are addressed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project. See also Response to Comment 81-3 regarding sewer concerns, and note that any future residential development on rezone sites within the Dry Creek area would be required to connect to public water, supplied by the PCWA, which, according to Table 5 of the Initial Study (Appendix A of the Draft EIR), has ample water supplies available to serve reasonably foreseeable future development during normal, dry, and multiple dry years through 2040.

In addition, as detailed in Section XV, Public Services, of the Initial Study, increased demand for public services, such as fire and police protection services, attributable to the proposed project would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts.

Letter 297

From: Haley Miranda
To: Placer County Environmental Coordination Services
Subject: Request to Stop Rezoning in the Vineyard Area (Roseville, CA)
Date: Tuesday, February 27, 2024 4:46:49 PM

Dear Placer County Community Development Resource Agency,

I hope this email finds you well. I am writing to express my concerns regarding the proposed rezoning in the Vineyard area (Property #7). After careful consideration and consultation with fellow community members, I strongly urge you to halt the rezoning process for several compelling reasons.

First and foremost, the proposed rezoning poses a significant threat to the existing character and integrity of the Vineyard area. This region holds immense cultural and historical significance, and any rezoning efforts must prioritize the preservation of its unique identity.

Furthermore, the proposed rezoning raises serious environmental concerns. The Vineyard area is home to diverse ecosystems and wildlife habitats, which could be irreversibly damaged by unchecked development. We must prioritize environmental conservation and sustainable land use practices to safeguard these precious natural resources for future generations.

297-1

Additionally, rezoning in the Vineyard area could exacerbate existing traffic congestion and strain local infrastructure. Without proper planning and investment in transportation and utilities, increased development could lead to a decline in the quality of life for residents and place undue burden on public services.

Moreover, rezoning efforts must be conducted transparently and inclusively, with meaningful engagement from all stakeholders. As members of the community, we expect to be actively involved in the decision-making process and to have our voices heard regarding matters that directly impact our neighborhoods and livelihoods.

In light of these concerns, I urge you to reconsider the proposed rezoning in the Vineyard area and to prioritize the long-term well-being of the community and the environment. It is imperative that we work together to develop sustainable solutions that balance growth and preservation.

Thank you for your attention to this matter. I look forward to a productive dialogue and collaborative efforts to shape the future of our community in a responsible and equitable manner.

Sincerely,
Haley Miranda
8331 Pinot Grigio St,
Roseville, CA 95747

LETTER 297: HALEY MIRANDA

Response to Comment 297-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts. Contrary to the commenter's assertion, development within the Dry Creek area cannot proceed unchecked as the majority of the area is within the boundaries of the Placer County Conservation Program (PCCP), which includes avoidance and minimization measures that must be complied with by new development. This is ensured by the County through the application review and approval process.

As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

The project's potential impacts related to utilities infrastructure are addressed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project. See also Response to Comment 81-3 regarding sewer concerns, and note that any future residential development on rezone sites within the Dry Creek area would be required to connect to public water, supplied by the PCWA, which, according to Table 5 of the Initial Study (Appendix A of the Draft EIR), has ample water supplies available to serve reasonably foreseeable future development during normal, dry, and multiple dry years through 2040.

Letter 298

From: mm ad
To: Placer County Environmental Coordination Services
Subject: PI
Date: Friday, March 8, 2024 5:58:13 PM

298-1 Please take this off the list, property 26, 8989 Auburn Folsom Road. This area should be maintained as a park, so wild life can continue to thrive here. Plus there's a middle school behind this property and you want to build a multi housing unit next to it. Traffic is already unsafe in this area. Lots of kids are walking from and to Cavitt junior high. Please stop this madness.



LETTER 298: MM

Response to Comment 298-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, as well as Response to Comment 470-2.

Letter 299

From: Diane Modiste
To: Placer County Environmental Coordination Services
Subject: 8989 Auburn Folsom Road, Granite Bay
Date: Friday, March 8, 2024 10:20:54 AM

Dear Sir/Madam:

299-1 Please do not develop this site at all. At the very least, please perform a proper EIR for Project 26. It is a habitat to many animals, and Linda Creek runs through it.

Thank you for your attention to this matter.

Sincerely,
Diane Modiste

LETTER 299: DIANE MODISTE

Response to Comment 299-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. In addition, potential impacts to biological resources, including wildlife and creeks, are addressed in Chapter 5, Biological Resources, of the Draft EIR. Please also see Response to Comment 52-2 regarding Linda Creek concerns.

Letter 300

From: Kally Kedlinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Protecting Site 26
Date: Thursday, March 14, 2024 2:22:59 PM

From: Sarah Moe <sarahandnils@gmail.com>
Sent: Wednesday, March 13, 2024 6:56 PM
To: Suzanne Jones <SuzanneJones@placer.ca.gov>
Subject: Protecting Site 26

Hello,

300-1

My neighborhood is adjacent to Cavitt Junior High and Property 26, on the corner of Auburn Folsom Road and Fuller Drive. Initially, the 17.5 acres currently zoned commercial was proposed for rezoning for high density housing with the potential for over 500 units.

At the Board of Supervisors meeting, the County Planner noted that their intent was to rezone just the southern 9.9 acres of Property 26 for high density housing, providing about 180 units. At the Planning Commission meeting, the same Planner noted that Property 26 could house 246 units on 12.5 acres. Communication with the public on this issue has been almost non-existent, and as illustrated above, has been intentionally misleading.

This site is not appropriate by any legal standard, to accomodate high density housing. The programmatic Environmental Impact Report does not give an accurate presentation of the environmental issues that development of high density housing will have on the property and the nearby community.

I am requesting at the very least a full Environmental Impact Assessment of the property be done before rezoning. Better yet, have the site removed completely from the list.

I understand the urgency of the moment. Placer County has chosen to wait and find ourselves In the frantic rush to meet the deadline, and therefore designed a streamlined process has been utilized that includes a draft EIR for the entire project, rather than individual Environmental Impact Studies for each site. While that may be appropriate for some of the identified properties, it is not appropriate for property 26. Propertly 26 is on environmentally sensitive terrain, it includes a creek and habitat for many different species of the land, water and air.

Placing a large, high density apartment complex there is in violation of the Placer County General Plan, the Granite Bay Community Plan and even the Guidelines published by the State to assist counties with this process.

300-1 cont.

Our community has spoken loudly about the desire to protect site 26 from development. We ask you to have some care for the future generations, for the youth that currently live and go to school right now, and to NOT forgo your public duty to protect us from this harmful type of fast tracked development.

Thank you for listening and doing the right thing.

--

Best Wishes,

Sarah Isabel & Nils Moe
Bronson Dr. Residents - Granite Bay

LETTER 300: SARAH MOE

Response to Comment 300-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. With respect to habitat concerns on Site 26, please see Response to Comment 52-2.

Letter 301

From: Sarah Moe
To: Suzanne Jones
Subject: Protecting Site 26
Date: Wednesday, March 13, 2024 6:56:08 PM

Hello,

My neighborhood is adjacent to Cavitt Junior High and Property 26, on the corner of Auburn Folsom Road and Fuller Drive. Initially, the 17.5 acres currently zoned commercial was proposed for rezoning for high density housing with the potential for over 500 units.

At the Board of Supervisors meeting, the County Planner noted that their intent was to rezone just the southern 9.9 acres of Property 26 for high density housing, providing about 180 units. At the Planning Commission meeting, the same Planner noted that Property 26 could house 246 units on 12.5 acres. Communication with the public on this issue has been almost non-existent, and as illustrated above, has been intentionally misleading.

This site is not appropriate by any legal standard, to accomodate high density housing. The programmatic Environmental Impact Report does not give an accurate presentation of the environmental issues that development of high density housing will have on the property and the nearby community.

301-1

I am requesting at the very least a full Environmental Impact Assessment of the property be done before rezoning. Better yet, have the site removed completely from the list.

I understand the urgency of the moment. Placer County has chosen to wait and find ourselves In the frantic rush to meet the deadline, and therefore designed a streamlined process has been utilized that includes a draft EIR for the entire project, rather than individual Environmental Impact Studies for each site. While that may be appropriate for some of the identified properties, it is not appropriate for property 26. Propertly 26 is on environmentally sensitive terrain, it includes a creek and habitat for many different species of the land, water and air.

Placing a large, high density apartment complex there is in violation of the Placer County General Plan, the Granite Bay Community Plan and even the Guidelines published by the State to assist counties with this process.

Our community has spoken loudly about the desire to protect site 26 from development. We ask you to have some care for the future generations, for the youth that currently live and go to school right now, and to NOT forgo your public duty to protect us from this harmful

301-1 cont

type of fast tracked development.

Thank you for listening and doing the right thing.

--

Best Wishes,

Sarah Isabel & Nils Moe
Bronson Dr. Residents - Granite Bay

LETTER 301: SARAH MOE

Response to Comment 301-1

Please see Response to Comment 300-1.

Letter 302

From: Sarah Isabel Moe
To: Placer County Environmental Coordination Services
Subject: Project 26
Date: Thursday, March 7, 2024 7:11:55 AM

302-1

Please take this site off your list or at the very least do a proper EIR. This is a sensitive creek area, floodplain and habitat to many. It is not right to skip this step. It will probably show that this is not a good site for high density, and also for terrible traffic reasons and safety for school
Kids. Thank you,
Sarah Moe
Granite bay resident and mother

Sent from my iPhone

LETTER 302: SARAH MOE

Response to Comment 302-1

Please see Response to Comment 300-1.

Letter 303

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to VLIH project at bell/new airport (9555, hearing feb 13)
Date: Tuesday, February 20, 2024 9:08:32 AM

From: Casey Mohan <cacee831@yahoo.com>
Sent: Saturday, February 3, 2024 11:30 AM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Opposition to VLIH project at bell/new airport (9555, hearing feb 13)

303-1

Hello, new airport rd resident here, wanted to send a note voicing my concern and opposition to this project. We already have the apartments and mobile home parks in very close proximity and if additional high density /low income housing is put in I believe that it will further hurt property values and I believe the higher density housing will introduce more safety and crowding concerns. Additionally new airport road will see increased traffic and congestion and I firmly believe there are other better options in placer for this project, that have a less direct impact on residents who have settled into the bell new airport area and represent a significant spend in our local community and businesses.

I enjoy the semi rural living we have, this was a big driver for our decision to buy in the location we did. If this project moves forward putting high density housing in we will be looking at selling, and taking our spend in the local community out of auburn and placer to another area that can provide the quality and type of living we sought here when we purchased and have valued.

New airport is also not structured in a way that supports high foot traffic with no full shoulder, sidewalks nor bikelane, and I believe this type of project will encourage significant increase in foot traffic/biking on this route and bell, which present its own set of risks and concerns.

I would also like to raise in consideration the impact of the reduction of wildland areas, and our lovely blend of wildlife having even less habitat and turning our lovely scenery into yet another wall of high density residences. this project is not aligned with my vision for the future of the community I invested in and intentionally continue to spend locally within. My votes will also go to candidates and measures who aim to support preservation of this community as it exists today as well. I am opposed to this project and intend to make my voice heard though this note and, as needed, future actions.

Reference: https://www.placer.ca.gov/9555/Rezone-workshop-Feb-13

Thank you,
Casey Mohan
+1 530-492-6106

LETTER 303: CASEY MOHAN

Response to Comment 303-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Regarding habitat concerns, it is noted that the subject parcel is located within the boundaries of the Placer County Conservation Program (PCCP). PCCP General Condition 3 requires payment of Land Conversion Fees for impacts to any natural land cover including oak woodlands, oak savannah, annual grasslands, etc. That Land Conversion Fee does not simply go into a fund, but is utilized by the PCA to purchase and preserve the same acreage of that land cover type at an off-site location. The PCCP contains provisions requiring the PCA to replace impacted habitat within a stated time frame. As a result, although impacts to habitat would be considered a significant impact, participation in the PCCP and payment of the Land Conversion Fee mitigates those impacts to a less than significant level.

Letter 304

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Fire insurance
Date: Thursday, March 7, 2024 12:25:34 PM

From: popicoc@gmail.com <popicoc@gmail.com>
Sent: Thursday, March 7, 2024 12:14 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fire insurance

304-1

North Auburn, Dry Creek, Bowman, Penryn, Granite Bay, Sheridan, and Applegate listed as the 72 proposed areas.
Who will be responsible for fire insurance as all of these are in areas that Insurance brokers have either dropped or raise rates so high they aren't even affordable for those of us that are not low income. The state insurance rates are out of sight that are available for those who have lost their fire insurance.
I believe this to be an unmitigated issue and I would like the question answered. We the taxpayer should not be on the hook!
I receive information from Bridget Powers and it avoids the question.
Sincerely,
Mike Monahan
Auburn

LETTER 304: MIKE MONAHAN

Response to Comment 304-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 305

From: Tara Moon
To: Placer County Environmental Coordination Services
Subject: I stand with opposing 8989 Auburn Folsom Road development
Date: Thursday, March 7, 2024 6:11:28 AM

305-1

I am writing to oppose the development of 8989 Auburn Folsom Road.

I am a commuter through this area daily; it is the only option to get from to Rocklin from Folsom. Me and 1000s of cars already wait at this intersection at times 15 plus minutes at peak travel times and at summer time with Lake traffic at both Lake entrances it is longer.

I've also noticed traffic is still recovering and ticking up as Covid is getting farther behind us and people are recovering.

I urgently request the parcel 26 be taken off the list and not be considered for rezoning..

Tara Moon
Granite Bay resident

LETTER 305: TARA MOON

Response to Comment 305-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 306

From: Kally Kedinger-Cecil
To: gregmoore@surewest.net; Bonnie Gore; Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Frank Udvarhely; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Cc: lauramoore@surewest.net
Subject: RE: Request to Remove Parcel 26 From The Rezone List
Date: Thursday, March 14, 2024 2:24:26 PM

Hello,

Thank you for your comments. They will be incorporated into the project record. Additional information on the rezone program is available here: Housing needs rezone program | Placer County, CA

Regards,

Kally Kedinger-Cecil
Senior Planner
Placer County Planning Services Division
kkedinge@placer.ca.gov
530-745-3034

From: gregmoore@surewest.net <gregmoore@surewest.net>
Sent: Thursday, March 14, 2024 9:22 AM
To: Bonnie Gore <BonnieGore@placer.ca.gov>; Shanti Landon <SLandon@placer.ca.gov>; Jim Holmes <JHolmes@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Frank Udvarhely <fudvarhely@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>
Cc: lauramoore@surewest.net
Subject: Request to Remove Parcel 26 From The Rezone List

Dear Board of Supervisors,

I am resending this email from my personal email.

My wife and I attended last week's MAC meeting, and I am in full agreement with the following summary and request submitted by Suzanne Volkman.

306-1

Last evening I had the opportunity to participate in a discussion regarding the parcel in Granite Bay at the corner of Fuller and Auburn Folsom Road. It was most enlightening as it focused specifically on an extremely controversial lot and a large crowd attended the Granite Bay MAC meeting. The Planning Director, Christopher Pahule, provided us with more details than were available at the Board of Supervisors meeting last month. He spoke directly about Parcel 26 which is the land creating the most questions. At the end of his presentation, the audience was allowed a time for questions.

There were several members of the public that appeared to be exceptionally well informed and provided excellent input. Unfortunately, no notes were taken. Mr. Pahule did agree, however, to have all comments translated and entered into the record. Hopefully, that will happen.

Here are a few of the better points made that should disqualify this parcel for consideration:

*Parcels are intended to be no more than 10 acres as the housing is to be "infill" rather than changing the character of an area.

*The parcel is environmentally sensitive in that it has been found to be part of the salmon habit as well as loads of wildlife including deer, coyote, etc. Probably toward the top of the list is that it is a known flight path for the endangered bald eagle that hunts the lake coastline and some have nests in trees along Lakeshore Drive next to the lake.

*This area of Granite Bay has been said to have in excess of 50,000 cars per day travel Auburn Folsom Road and Douglas Blvd. The roadway cannot handle the additional cars that would result if the land was developed.

*Directly adjacent to this parcel is Cavitt Jr. High. Tremendous traffic occurs each school day morning and afternoon. Building a high-density project would be dangerous to the children who cut corners and dash for their parent's cars.

306-1 cont.

*A section of the 600+ page report has a very offensive statement. In summary it states that Granite Bay needs more low-income individuals to dilute the high-income residents.

*If this parcel were owned by an individual that wanted to develop what the county was suggesting, it would never gain traction. Vernal pools, threatened species, no safe ingress/egress onto Fuller Drive or Auburn Folsom Road for the level of traffic that would occur.

*Granite Bay would share a much larger percentage of the housing than any other community.

*Mr. Pahule stated that there is county property on Cincinnati that's being considered. To the audience it made much more sense than to strand low-income individuals at the far corner of Granite Bay with severely limited job opportunities and other resources to assist them.

The above are just a few of the lengthy comments and questions that were taken. Mr. Pahule listened and didn't respond to any questions that were uncomfortable.

In closing, it appears that the planning department has it within their authority to further investigate county owned property and refocus their efforts. The Cincinnati property, as Mr. Pahule explained, has a few obstacles in order to develop it. Well, "26" would be even more challenging and threaten protected species.

Asking you to support the removal of Parcel 26 from the list.

Greg Moore
Home Owner
7252 Silver Tree Place, Granite Bay

LETTER 306: GREG MOORE

Response to Comment 306-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

It is also noted that the County has secured grant funding to install a new enhanced crosswalk for pedestrians crossing Fuller Drive near Cavitt Junior High School. The grant funding is unrelated to the proposed project and will be installed whether or not site 26 is rezoned as part of the proposed project. That new crosswalk could alleviate the concerns raised by the commenter.

Regarding biological resources on Site 26 and associated concerns, please see Responses to Comments 52-2 and 422-8.

Letter 307

From: gregmoore@surewest.net
To: Bonnie Gore; Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Kally Kedinger-Cecil; Frank Udvarhely; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Cc: lauramoore@surewest.net
Subject: Request to Remove Parcel 26 From The Rezone List
Date: Thursday, March 14, 2024 9:22:36 AM

Dear Board of Supervisors,

I am resending this email from my personal email.

My wife and I attended last week's MAC meeting, and I am in full agreement with the following summary and request submitted by Suzanne Volkman.

Last eveningI had the opportunity to participate in a discussion regarding the parcel in Granite Bay at the corner of Fuller and Auburn Folsom Road. It was most enlightening as it focused specifically on an extremely controversial lot and a large crowd attended the Granite Bay MAC meeting. The Planning Director, Christopher Pahule, provided us with more details than were available at the Board of Supervisors meeting last month. He spoke directly about Parcel 26 which is the land creating the most questions. At the end of his presentation, the audience was allowed a time for questions.

There were several members of the public that appeared to be exceptionally well informed and provided excellent input. Unfortunately, no notes were taken. Mr. Pahule did agree, however, to have all comments translated and entered into the record. Hopefully, that will happen.

Here are a few of the better points made that should disqualify this parcel for consideration:

307-1

*Parcels are intended to be no more than 10 acres as the housing is to be "infill" rather than changing the character of an area.

*The parcel is environmentally sensitive in that it has been found to be part of the salmon habit as well as loads of wildlife including deer, coyote, etc. Probably toward the top of the list is that it is a known flight path for the endangered bald eagle that hunts the lake coastline and some have nests in trees along Lakeshore Drive next to the lake.

*This area of Granite Bay has been said to have in excess of 50,000 cars per day travel Auburn Folsom Road and Douglas Blvd. The roadway cannot handle the additional cars that would result if the land was developed.

*Directly adjacent to this parcel is Cavitt Jr. High. Tremendous traffic occurs each school day morning and afternoon. Building a high-density project would be dangerous to the children who cut corners and dash for their parent's cars.

*A section of the 600+ page report has a very offensive statement. In summary it states that Granite Bay needs more low-income individuals to dilute the high-income residents.

307-1 cont.

*If this parcel were owned by an individual that wanted to develop what the county was suggesting, it would never gain traction. Vernal pools, threatened species, no safe ingress/egress onto Fuller Drive or Auburn Folsom Road for the level of traffic that would occur.

*Granite Bay would share a much larger percentage of the housing than any other community.

*Mr. Pahule stated that there is county property on Cincinnati that's being considered. To the audience it made much more sense than to strand low-income individuals at the far corner of Granite Bay with severely limited job opportunities and other resources to assist them.

The above are just a few of the lengthy comments and questions that were taken. Mr. Pahule listened and didn't respond to any questions that were uncomfortable.

In closing, it appears that the planning department has it within their authority to further investigate county owned property and refocus their efforts. The Cincinnati property, as Mr. Pahule explained, has a few obstacles in order to develop it. Well, "26" would be even more challenging and threaten protected species.

Asking you to support the removal of Parcel 26 from the list.

Greg Moore
Home Owner
7252 Silver Tree Place, Granite Bay

LETTER 307: GREG MOORE

Response to Comment 307-1

Please see Response to Comment 306-1.

Letter 308

From: Laura Moore
To: Placer County Environmental Coordination Services
Subject: Remove Site 26 From the Rezone list
Date: Friday, March 8, 2024 10:09:53 PM

308-1 I strongly oppose the rezone of site 26.
I support removing it from the rezone plan.

Laura Moore, Broker Associate
Coldwell Banker
916-716-9069
Laura.moore@cbnorcal.com
https://urldefense.com/v3/__http://www.lauramoorerealestate.com__;!!MpIowJlePheLWIc!kUbeSE9Fkh19hbrZGR7BAq5zlru6Di6IE4ir7iqARyFpAHtwEEn_4MxiuKaYaXr9rGTrZJ5opbWzEJ9uERILhPYTg5

BRE #01247653

Sent from my iPhone

LETTER 308: LAURA MOORE

Response to Comment 308-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 309

From: Laura Moore
To: Bonnie Gore; Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Kally Kedinger-Cecil; Frank Udvarhely; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Subject: Request to Remove Parcel 26 From The Rezone List
Date: Monday, March 11, 2024 4:24:19 PM

Dear Board of Supervisors,

I attended last week's MAC meeting and am in full agreement with the following summary and request submitted by Suzanne Volkman.

Last evening I had the opportunity to participate in a discussion regarding the parcel in Granite Bay at the corner of Fuller and Auburn Folsom Road. It was most enlightening as it focused specifically on an extremely controversial lot and a large crowd attended the Granite Bay MAC meeting. The Planning Director, Christopher Pahule, provided us with more details than were available at the Board of Supervisors meeting last month. He spoke directly about Parcel 26 which is the land creating the most questions. At the end of his presentation, the audience was allowed a time for questions.
There were several members of the public that appeared to be exceptionally well informed and provided excellent input. Unfortunately, no notes were taken. Mr. Pahule did agree, however, to have all comments translated and entered into the record. Hopefully, that will happen.
Here are a few of the better points made that should disqualify this parcel for consideration:
*Parcels are intended to be no more than 10 acres as the housing is to be "infill" rather than changing the character of an area.
*The parcel is environmentally sensitive in that it has been found to be part of the salmon habit as well as loads of wildlife including deer, coyote, etc. Probably toward the top of the list is that it is a known flight path for the endangered bald eagle that hunts the lake coastline and some have nests in trees along Lakeshore Drive next to the lake.
*This area of Granite Bay has been said to have in excess of 50,000 cars per day travel Auburn Folsom Road and Douglas Blvd. The roadway cannot handle the additional cars that would result if the land was developed.
*Directly adjacent to this parcel is Cavitt Jr. High. Tremendous traffic occurs each school day morning and afternoon. Building a high density project would be dangerous to the children who cut corners and dash for their parents cars.
*A section of the 600+ page report has a very offensive statement. In summary it states that Granite Bay needs more low income individuals to dilute the high income residents.
*If this parcel were owned by an individual that wanted to develop what the county was suggesting, it would never gain traction. Vernal pools, threatened species, no safe ingress/egress onto Fuller Drive or Auburn Folsom Road for the level of traffic that would occur.
*Granite Bay would share a much larger percentage of the housing than any other community.
*Mr. Pahule stated that there is county property on Cincinnati that's being considered. To the audience it made much more sense than to strand low income

309-1

309-1 cont.

individuals at the far corner of Granite Bay with severely limited job opportunities and other resources to assist them.
The above are just a few of the lengthy comments and questions that were taken. Mr. Pahule listened and didn't respond to any questions that were uncomfortable. In closing, it appears that the planning department has it within their authority to further investigate county owned property and refocus their efforts. The Cincinnati property, as Mr. Pahule explained, has a few obstacles in order to develop it. Well, "26" would be even more challenging and threaten protected species.
Asking you to support the removal of Parcel 26 from the list.

Respectfully,
Laura Moore

I have not verified any of the information supplied by others

Laura Moore, CRS
Broker Associate
CalBRE# 01247653

916-716-9069
lmoore@lauramoorerealestate.com
www.lauramoorerealestate.com

Coldwell Banker Realty
2200-B Douglas Blvd., Suite 200 Roseville CA 95661

Up-to-date Quarterly Market Reports for Placer, Sacramento, and El Dorado Counties.

LETTER 309:LAURA MOORE

Response to Comment 309-1

Please see Response to Comment 306-1.

Letter 310

From: lauramoore@surewest.net
To: Bonnie Gore; Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Kally Kedinger-Cecil; Frank Udvarhely; Board Clerk; Planning Commission; Placer County Environmental Coordination Services
Cc: lauramoore@surewest.net
Subject: Request to Remove Parcel 26 From The Rezone List
Date: Wednesday, March 13, 2024 6:16:39 PM

Dear Board of Supervisors,

My wife and I attended last week's MAC meeting, and I am in full agreement with the following summary and request submitted by Suzanne Volkman.

Last evening I had the opportunity to participate in a discussion regarding the parcel in Granite Bay at the corner of Fuller and Auburn Folsom Road. It was most enlightening as it focused specifically on an extremely controversial lot and a large crowd attended the Granite Bay MAC meeting. The Planning Director, Christopher Pahule, provided us with more details than were available at the Board of Supervisors meeting last month. He spoke directly about Parcel 26 which is the land creating the most questions. At the end of his presentation, the audience was allowed a time for questions.

310-1

There were several members of the public that appeared to be exceptionally well informed and provided excellent input. Unfortunately, no notes were taken. Mr. Pahule did agree, however, to have all comments translated and entered into the record. Hopefully, that will happen.

Here are a few of the better points made that should disqualify this parcel for consideration:

*Parcels are intended to be no more than 10 acres as the housing is to be "infill" rather than changing the character of an area.

*The parcel is environmentally sensitive in that it has been found to be part of the salmon habit as well as loads of wildlife including deer, coyote, etc. Probably toward the top of the list is that it is a known flight path for the endangered bald eagle that hunts the lake coastline and some have nests in trees along Lakeshore Drive next to the lake.

*This area of Granite Bay has been said to have in excess of 50,000 cars per day travel Auburn Folsom Road and Douglas Blvd. The roadway cannot handle the additional cars that would result if the land

310-1 cont.

was developed.
*Directly adjacent to this parcel is Cavitt Jr. High. Tremendous traffic occurs each school day morning and afternoon. Building a high-density project would be dangerous to the children who cut corners and dash for their parent's cars.
*A section of the 600+ page report has a very offensive statement. In summary it states that Granite Bay needs more low-income individuals to dilute the high-income residents.
*If this parcel were owned by an individual that wanted to develop what the county was suggesting, it would never gain traction. Vernal pools, threatened species, no safe ingress/egress onto Fuller Drive or Auburn Folsom Road for the level of traffic that would occur.
*Granite Bay would share a much larger percentage of the housing than any other community.
*Mr. Pahule stated that there is county property on Cincinnati that's being considered. To the audience it made much more sense than to strand low-income individuals at the far corner of Granite Bay with severely limited job opportunities and other resources to assist them.
The above are just a few of the lengthy comments and questions that were taken. Mr. Pahule listened and didn't respond to any questions that were uncomfortable.
In closing, it appears that the planning department has it within their authority to further investigate county owned property and refocus their efforts. The Cincinnati property, as Mr. Pahule explained, has a few obstacles in order to develop it. Well, "26" would be even more challenging and threaten protected species.
Asking you to support the removal of Parcel 26 from the list.

Greg Moore
Home Owner
7252 Silver Tree Place, Granite Bay

LETTER 310: GREG MOORE

Response to Comment 310-1

Please see Response to Comment 306-1.

Letter 311

From: Laura Moore
To: Placer County Environmental Coordination Services
Subject: EIR for Site 26 Granite Bay rezone
Date: Friday, March 8, 2024 10:06:06 PM

311-1

I respectfully request that a full ROR be performed for site 26.

This site has not been properly or fully evaluated.

Laura Moore, Broker Associate
Coldwell Banker
916-716-9069
Laura.moore@cbnorcal.com
https://urldefense.com/v3/__http://www.lauramoorerealestate.com__;!!IsnIowJIePbsLWIcIh_QPR_TPeqGfiXiZPpl5fU7zJ22edZrYA1kPnsavb_dqProt62tE0rXJxdEJLis6n7JVOmrMXEImpoC4uYIL8iA1HGn3$

BRE #01247653

Sent from my iPhone

LETTER 311: LAURA MOORE

Response to Comment 311-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 312

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Needs Rezone
Date: Thursday, March 7, 2024 4:32:10 PM

-----Original Message-----
From: drkmoore@juno.com <drkmoore@juno.com>
Sent: Friday, March 1, 2024 8:44 AM
To: Placer County Planning <Planning@placer.ca.gov>
Subject: Housing Needs Rezone

To Whom it May Concern:
RE: Housing Needs Rezone Program

312-1 My wife and I are very supportive of the county's efforts to encourage the development of affordable housing. We have no objection to the proposal to allow development in our neighborhood.

Cordially,

Kenneth and Susan Moore
11662 Graeagle Lane
Auburn, CA 95602

LETTER 312: KENNETH AND SUSAN MOORE

Response to Comment 312-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 313

TO: Placer County Conservation Program
FROM: The Residents listed at the end of this letter
DATE: March 5, 2024
ATTN: Ms Sadie Caldas
RE: File a Code Enforcement Case
Email: afabela7@sbcglobal.net
kelley.moreno@gmail.com
Phone: 530-305-6213
916-910-4060

Greetings;

313-1

We are bringing to your attention, our research of the following parcel sites that have been proposed for RM30 rezoning. Included are results, showing issues of legality and environmental which are most concerning to us. We respectfully request that these issues be thoroughly addressed through the Placer County (PC) Code Enforcement, the PC Conservation Program as well as the PC Planning Department:

Site #71 – APN 054-290-064-000 - 85 LINCOLN WY AUBURN 95603 – 2.9 acres - **126,324 sq. ft.**
Site #72 – APN 054-290-065-000 - 85 LINCOLN WY AUBURN 95603 – 4.5 acres - 196,020 sq. ft.

- 1 code enforcement case was filed on October 20, 2023
- 2 planning permits for tree work applied for by the owner in 2016 and 2021. The latter date is documented as completed (**see attached pics #6**).
- 2 grading permits were applied for by the owner of sites #71 and #72 in 2019 and 2023 that are **still pending under review**, and **must be approved before commencing grading**. We would like to report that even though there are pending grading permits from 2019 and 2023, the property owner (Auburn Sierra Views LLC), with a corporation grant deed, has already cut down a huge amount of trees, with a permit, over the last 2-3 years and has also graded a substantial amount of square footage of the proposed rezoning sites #71 and #72. According to neighbors, who witnessed work being done on both sites, there was no erosion control to protect soils from entering into the stream and the straw waddle used was not dug down the required inches and only sits above the soil. It is understood there are requirements for coverings/screens to protect vegetation and endangered species which were not used, in addition to, that an earth compactor was not used during movement of graded soil and only watered down with a watering truck (**see attached pics #2, #5 and #7**).
- With so many trees cut down, no documentation could be found, as to how many of these trees were heritage oaks, nor any documentation from any agency to reassure the protection of any existing heritage oaks (**see attached pics #4 and #7**).
- No building permits have been requested on both parcels (#71 and #72 rezone sites).

313-1 con't • #71 and #72 rezone sites are presently zoned RS, Residential Single Family.

• It appears that a CARP authorization should have been filed with the Placer County Conservation Program, as both sites #71 and #72 have a live stream that flows both, through and within these property boundaries. It is important to mention, this live stream eventually flows into the American River (**see attached pics #1**) .
Additionally, both parcels are, each, more than 20,000 sq. ft. and the proposed project of a 3 story building on each parcel is more than 5,000 sq. ft., as posted at the February 22, 2024, public meeting. Also, the EIR list of proposed rezoning sites participating in the Placer County Conservation Program (PCCP) on pages 5-4 to 5-38, showed no inclusion of sites #71 and #72, which according to the Decision Tree, these parcels should have been included **and request this to be reviewed (see attached Decision Tree)**.

313-2

(**CLEAN WATER ACT** - Section 401 of the CWA (Title 33 of U.S. Code [USC], Section 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the U.S. to obtain a certification that the discharge will comply with the applicable effluent limitations and water quality standards. Waters of the United States include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, and wet meadows. Wetlands are defined as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR Section 328.3[b]).

• An additional reason for a needed CARP authorization, is that a wetland, fresh water pond exists at the backside east border of the Mcnee Family Limited Partnership property, the Don Rice property and another property. The back east borders of parcel sites #71 and #72, borders the Mcnee property. The previously mentioned live stream that flows both, through and within sites #71 and #72, also flows into and through this wetland, fresh water pond and empties into the American River **and request this to be reviewed (see attached pics #3)**.

313-3

At the Planning Commission meeting held on February 22, 2024, as presented to the public attendees, the present EIR was streamlined, meaning Placer County staff conducted the EIR and whom made an analysis and made recommendations that included all 72+/- proposed rezoning sites, ear-marked for RM30 zoning. Even though the Placer County staff reported that any **post project request** for development of any proposed site might require a further EIR, for CEQA to review, it appears the seemingly violation by the property owner NOT seeking a CARP authorization, prior to rezoning approval, and **NOT** considered in the EIR, should be addressed for sites #71 and #72, **NOW,** instead of after the fact. It also appears that the property owner(s) acted in a way according to their own desires and assumptions, without any approved grading permits. The fact that neither the Placer County planning nor the building departments supervised any activity on either of these two sites can be indicative of the property owner(s) present and future behaviors of not abiding by any set policies and rules of either of both

313-3 con't

departments nor by the requirements of the Placer County Conservation Program (PCCP) which is a major concern. The lengthy information written in the DEIR, that explains the purpose, responsibilities, guidelines and types of vegetation and protected species by the Placer County Conservation Program, must be adhered to and therefore, **it is requested for sites #71 and #72 to be investigated for violating not only permit requirements but also for violating any PCCP requirements**.

We appreciate your consideration of what we have presented to you and hope this can be expedited for approval of a thorough and timely investigation.

Respectfully,
Al Lauer and Kelley Moreno
Megan Moreno
Ken Magee and Antoinette Fabela
Richard and Linda Schlais
John and Wendy Shingle
Mark Cardin
Mike Kelly
Matt and Mahala Archer
Nancy Nebilak and Travis Rose
Maggie Henning
Mike Kelly
Tom and Deb Faciana

313-4

Begin #1

1. Live stream- Starts at Alta Vista School undeveloped property; Flows through sites #71 & #72 and other properties into wetland freshwater pond; flows under Foresthill Rd, across to Canyon Dr., then flows along this road, past Canyon Way into the American River. --Topo pic shows flow of stream.



Alta Vista School →



Blue line = Stream flow



↑ Alta Vista School - Stream Starts ↑



#1



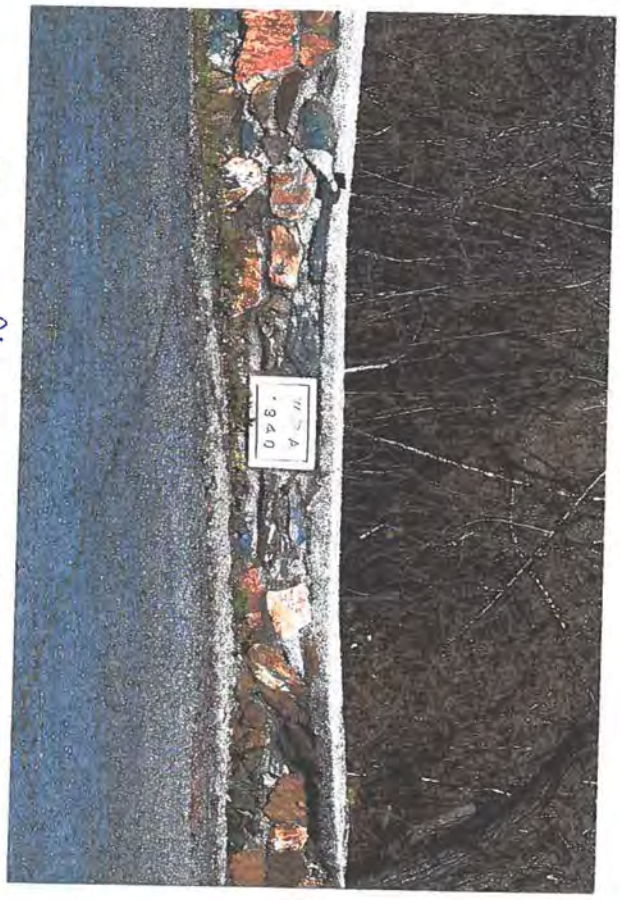


#1

#1



Stream flows under Foresthill Rd.





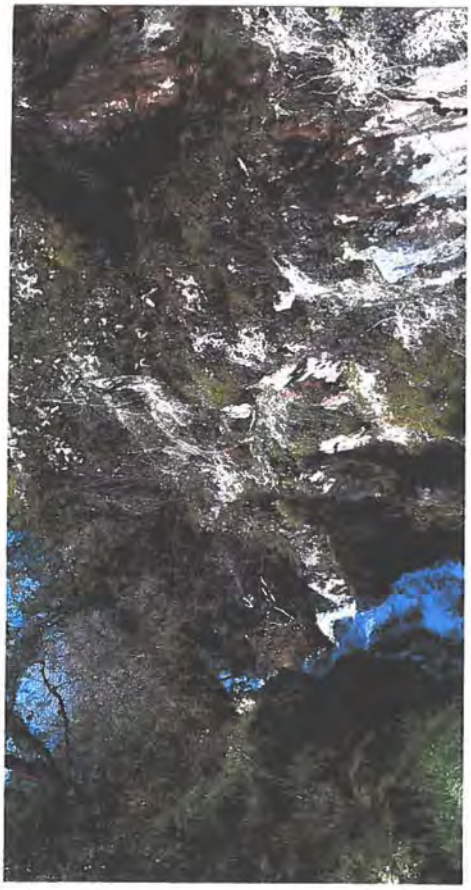


Stream Along Canyon Dr.



#1





Water Fall into American River - Pic taken from Hwy. 49 near Forest Ranger station

End #1

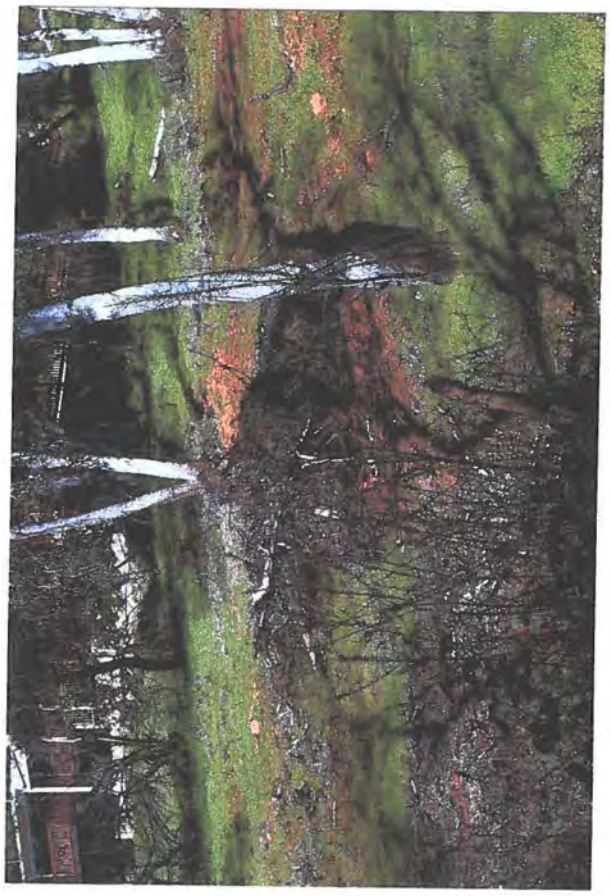
2. Pics from neighbors property that borders sites #71 & #72; Stream flows through both properties; Can see: Back slope of #71 & #72, cleared and graded area; Stacks of cut trees; Small area w/ straw waddle; Protected vegetation/habitat NOT protected during grading or cutting down trees

Small area w/ straw waddle





Begin #2





#2

#2





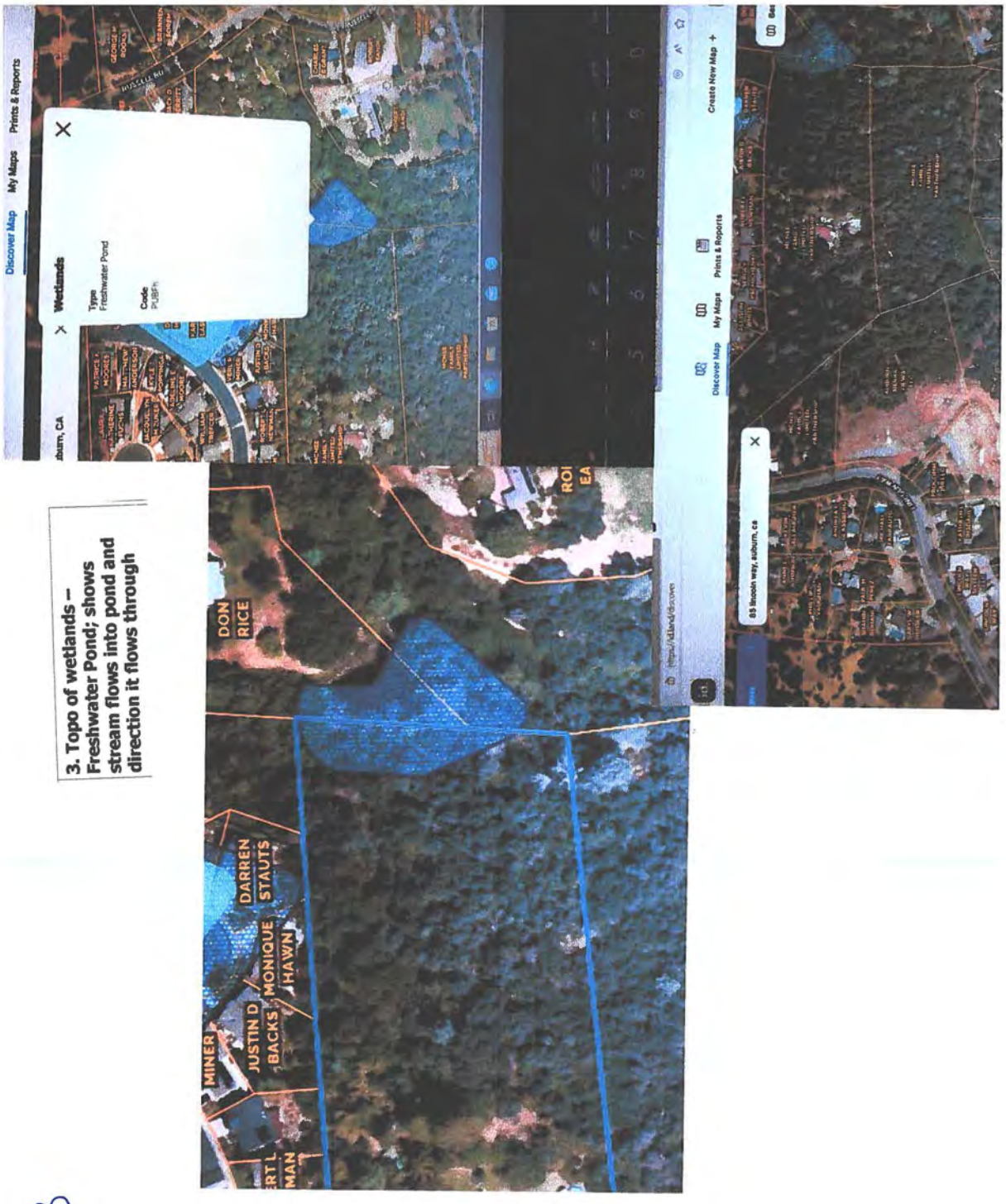
Live Stream along Site #71 + #72 and neighbors property line boundaries


#72
Evidence of a track digger located at the far east, sloped property of sites #71 & #72, along live stream..NO SIGNS of protecting stream, vegetation & habitat. Pic from July 18, 2023
2C-01-2



Live Stream

End of #2



3. Topo of wetlands – Freshwater Pond; shows stream flows into pond and direction it flows through

#3

4. Stacked roots & logs along Lincoln Way; Heritage Oaks?

Pic from Lincoln Way

Begin #4

#4









End #4

5. Pics taken from Lincoln Way of graded areas of sites #71 & #72 ; Water Trucks on these 2 sites; Roll of straw waddle





Begin #5



End #5

6. Topo pics of sites #71 & #72 prior to trees cut down and grading.





Begin #6

End #6


FAMILY
LIMITED
PARTNERSHIP
LIMITED
PARTNERSHIP
PHILLIP C
VAUGHAN
ANDREA E
GLASSBERG
SHAHIN
BOHARI
PAIR M
PEREZ
MICHAEL
FARRAUTO
AUBURN
SIERRA
VIEWS
LLC
MCNEE
FAMILY
LIMITED
PARTNERSHIP
LINCOLN WAY
PRINCHAM
360 LLC
KATHRYN L
HASHAMI
AUBURN
SIERRA
VIEWS
LLC
ROBIN
CUNNINGHAM
LLOYD G
LAWSON
CAMERON
LAYTON
JOHN G
BURGLE
KYLE

2/28/24, 12:39 PM 91 Lincoln Way - Google Maps

7. Pics provided by a bordering neighbor

Begin #7
Sites #71 & #72 BEFORE Cleared

Google Maps 91 Lincoln Way

Auburn, California

Google Street View

Jul 2007 See more dates



Image capture: Jul 2007 © 2024 Google

je Coach top c

Lincoln Wa

https://www.google.com/maps/@38.9114057,-121.0611907,3a,75y,79.85h,92.99t/data=!3m6!1e1!3m4!1sjMEGErODfvVXQKZrGY3C4A!2e0!7i3328!8i1664!5m1!1e4?entry=ttu 1/1

2/28/24, 12:40 PM 91 Lincoln Way - Google Maps

#7

Google Maps 91 Lincoln Way



Image capture: Jul 2012 © 2024 Google



https://www.google.com/maps/@38.9113399,-121.0612482,3a,75y,74.5h,78.39t/data=!3m7!1e1!3m5!1s9km6WIWQ1buCfcTYqjM6qw!2e0!5s20120701T000000!7i13312!8i6656?entry=ttu 1/1

2/28/24, 12:40 PM 91 Lincoln Way - Google Maps

#7

Google Maps 91 Lincoln Way



Image capture: May 2015 © 2024 Google



https://www.google.com/maps/@38.9113695,-121.0612841,3a,75y,84.04h,82.38t/data=!3m7!1e1!3m5!1su0TF46RIMa9N0e2D7Ha2-Q!2e0!5s20150501T000000!7i13312!8i6656?entry=ttu 1/1

2/28/24, 2:25 PM 85 Lincoln Way - Google Maps

#7

Google Maps 85 Lincoln Way



Image capture: May 2016 © 2024 Google



https://www.google.com/maps/@38.9115756,-121.0610815,3a,75y,112.71h,91.15t/data=!3m7!1e1!3m5!1suKmzjKt0qjZFIicCFxWqJg!2e0!5s20160501T000000!7i13312!8i6656?entry=ttu 1/1

2/28/24, 1:30 PM 85 Lincoln Way - Google Maps

#7

Google Maps 85 Lincoln Way



Image capture: May 2016 © 2024 Google



https://www.google.com/maps/@38.9114828,-121.061115,3a,75y,98.26h,91.14t/data=!3m7!1e1!3m5!1sMncFyTjLt6n_LktR-xH3gQ!2e0!5s20160501T000000!7i13312!8i6656?entry=ttu 1/1

#7

Google Maps 91 Lincoln Way



Image capture: Jun 2016 © 2024 Google



https://www.google.com/maps/@38.9113369,-121.0612659,3a,75y,62.84h,74.44t/data=!3m7!1e1!3m5!1sPYf4Jb3qsqmKwiATUvFulg!2e0!5s20160601T000000!7i13312!8i6656?entry=ttu 1/1

LETTER 313: KELLEY MORENO

Response to Comment 313-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 313-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 313-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 313-4
This section contains pictures of Sites 71 and 72. Further response is not necessary.

Letter 314

314-1

PCCP | PLACER COUNTY CONSERVATION PROGRAM

DECISION TREE*
FOR BUILDING PERMITS

Is the project more involved than a simple building permit (e.g. re-roof, mechanical, residential solar, water heater change-out, etc.)?

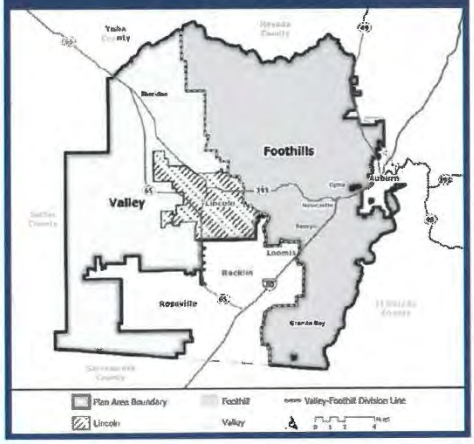
NO → Not a PCCP covered activity

YES

Is the project in the PCCP Plan Area?

YES

PCCP PLAN AREA



Is your project for a building permit ONLY (no other permits needed) for a new structure that meets zoning and setback requirements?

YES

NO — Grading permits, variances, etc. could potentially trigger PCCP coverage.

Does the property have entitlements (e.g. Parcel Map, Subdivision Map) approved before November 1, 2020? Ask a Planning Technician at Planning@placer.ca.gov if unsure.

NO

YES

Does the property have natural, semi-natural, rural residential, or agricultural land cover? Check your Land Cover here

YES

NO

Is the parcel larger than 20,000 square feet?

NO

YES

Is the parcel developed with an existing single family dwelling or other use?

YES

NO

Is the parcel undeveloped?

YES

Will the project result in more than 5,000 square feet of impervious surface (e.g. building footprint, covered porches, patios, gravel or paved drive and walkways)?

NO

Note: If project is in the Foothills, it may be subject to the Open Space/ Fire Hazard Management Fee. (County Code Section 19.50.040)

Is there a stream or wetland on site?

YES

NO

Not a PCCP covered activity

If state and federal permits are required, the applicant may chose to opt-in to PCCP. Contact PCCP@placer.ca.gov for opt-in application.

*If a Covered Species or it's habitat is on a project/ parcel that has been determined not covered by the PCCP, the Applicant will still need to consult with state and federal agencies about potential coverage. See below for information on where Covered Species are typically found in the PCCP Plan Area.

☑ Placer County Conservation Program Applies

PLACER COUNTY CONSERVATION PROGRAM'S COVERED SPECIES AND WHERE TO FIND THEM

Birds

Western Burrowing Owl



Nests and forages in grassland habitats where they can dig or take over burrows previously inhabited by small mammals. Also found in agricultural and rangelands. May nest and overwinter in oak woodlands and vernal pool complexes.

Tricolored Blackbird



Prefers marsh complexes and thickets of Himalayan blackberry for nesting. Upland foraging habitats can include many different communities such as grassland, vernal pool complexes, agricultural fields, cattle feedlots, dairies, and occasional riparian scrub areas.

California Black Rail



Commonly found nesting in fresh emergent wetlands and perennial wetlands with shallow water. They nest in dense marsh vegetation such as bulrush, cattails, etc.

Swainsons Hawk



Nests in mature trees adjacent to suitable foraging habitat. Typically located along riverine/riparian corridors (creeks & streams) near open landscapes such as grasslands, vernal pool complexes, and agricultural lands. May nest in riverine/riparian and oak woodland adjacent to suitable foraging habitat.

Reptiles & Amphibians

Giant Garter Snake



Aquatic habitat found in marshes and agricultural wetlands, particularly rice fields and associated slow-moving waterways, including irrigation and drainage canals, ponds, and slow-moving streams. Adjacent upland habitat is typically within 200 feet of aquatic habitat and used for refuge and basking.

Western Pond Turtle



Aquatic habitat includes fresh emergent wetlands, seasonal wetland, riverine/riparian, and ponds. Upland habitat includes grasslands and oak woodlands within 150 feet of aquatic habitat. This surrounding terrestrial habitat is vital for this species during nesting and overwintering.

California Red-legged Frog



Aquatic habitat includes riverine/riparian, ponds, wetlands, and marsh habitats in the Foothills above 200-foot elevation. Upland habitat includes grasslands and oak woodlands within a mile of aquatic habitat that provide vegetation and small mammal burrows for protection.

California Yellow-legged Frog



Year-round aquatic habitat includes riverine and riparian habitats in rocky perennial streams in the Foothills above 500-foot elevation.

Invertebrates

Valley Elderberry Longhorn Beetle



Occupies elderberry shrubs occurring in valley oak woodlands and riparian vegetation. Primarily found in wet or riverine areas that support significant riparian zones but may occupy upland shrubs as well.

Conservancy Fairy Shrimp



Occurs in vernal pools and seasonal wetlands primarily. Currently known within a small geographic area of Placer County.

Vernal Pool Fairy Shrimp



Primarily occurs in vernal pools, seasonal wetlands, swales, and shallow seasonally ponded features in the Valley and lower Foothills. This species lies dormant in the soil until suitable conditions for hatching. Vernal pool complexes are ideal habitat for fairy shrimp.

Vernal Pool Tadpole Shrimp



Occurs in the same habitats as vernal pool fairy shrimp. Pools typically have turbid (murky) waters or aquatic vegetation that may provide shelter from predators.

Fish

Chinook Salmon



Found in streams connected to the Pacific Ocean, such as Bear River, Racoon Creek, Auburn Ravine, and Dry Creek. Spawning and incubation require correct water velocity, temperature, depth, and substrate to be successful. Instream and overhead cover (undercut banks, overhanging tree branches, etc.) are important for juveniles.

Central Valley Steelhead



Found in streams connected to the Pacific Ocean, such as Bear River, Racoon Creek, Auburn Ravine, and Dry Creek. Spawning and incubation require correct velocity, temperature, and substrate (gravel without too much silt) to be successful. Instream and overhead cover (undercut banks, overhanging tree branches, etc.) are important for juveniles.

Questions?

Visit www.placer.ca.gov/PCCP

or email PCCP@placer.ca.gov

PCCP | PLACER COUNTY CONSERVATION PROGRAM

314-1 cont.

LETTER 314: KELLEY MORENO

Response to Comment 314-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 315

TO: Placer County Conservation Program
FROM: The Residents listed at the end of this letter
DATE: March 5, 2024
ATTN: Ms Sadie Caldas
RE: File a Code Enforcement Case
Email: afabela7@sbcglobal.net
kelley.moreno@gmail.com
Phone: 530-305-6213
916-910-4060

Greetings;

We are bringing to your attention, our research of the following parcel sites that have been proposed for RM30 rezoning. Included are results, showing issues of legality and environmental which are most concerning to us. We respectfully request that these issues be thoroughly addressed through the Placer County (PC) Code Enforcement, the PC Conservation Program as well as the PC Planning Department:

Site #71 – APN 054-290-064-000 - 85 LINCOLN WY AUBURN 95603 – 2.9 acres - **126,324 sq. ft.**
Site #72 – APN 054-290-065-000 - 85 LINCOLN WY AUBURN 95603 – 4.5 acres - 196,020 sq. ft.

- 1 code enforcement case was filed on October 20, 2023
- 2 planning permits for tree work applied for by the owner in 2016 and 2021. The latter date is documented as completed (**see attached pics #6**).

315-1

- 2 grading permits were applied for by the owner of sites #71 and #72 in 2019 and 2023 that are **still pending under review**, and **must be approved before commencing grading**. We would like to report that even though there are pending grading permits from 2019 and 2023, the property owner (Auburn Sierra Views LLC), with a corporation grant deed, has already cut down a huge amount of trees, with a permit, over the last 2-3 years and has also graded a substantial amount of square footage of the proposed rezoning sites #71 and #72. According to neighbors, who witnessed work being done on both sites, there was no erosion control to protect soils from entering into the stream and the straw waddle used was not dug down the required inches and only sits above the soil. It is understood there are requirements for coverings/screens to protect vegetation and endangered species which were not used, in addition to, that an earth compactor was not used during movement of graded soil and only watered down with a watering truck (**see attached pics #2, #5 and #7**).

- With so many trees cut down, no documentation could be found, as to how many of these trees were heritage oaks, nor any documentation from any agency to reassure the protection of any existing heritage oaks (**see attached pics #4 and #7**).

- No building permits have been requested on both parcels (#71 and #72 rezone sites).

• #71 and #72 rezone sites are presently zoned RS, Residential Single Family.

• It appears that a CARP authorization should have been filed with the Placer County Conservation Program, as both sites #71 and #72 have a live stream that flows both, through and within these property boundaries. It is important to mention, this live stream eventually flows into the American River **(see attached pics #1)** .
Additionally, both parcels are, each, more than 20,000 sq. ft. and the proposed project of a 3 story building on each parcel is more than 5,000 sq. ft., as posted at the February 22, 2024, public meeting. Also, the EIR list of proposed rezoning sites participating in the Placer County Conservation Program (PCCP) on pages 5-4 to 5-38, showed no inclusion of sites #71 and #72, which according to the Decision Tree, these parcels should have been included **and request this to be reviewed (see attached Decision Tree).**

(**CLEAN WATER ACT** - Section 401 of the CWA (Title 33 of U.S. Code [USC], Section 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the U.S. to obtain a certification that the discharge will comply with the applicable effluent limitations and water quality standards. Waters of the United States include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, and wet meadows. Wetlands are defined as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR Section 328.3[b]).

• An additional reason for a needed CARP authorization, is that a wetland, fresh water pond exists at the backside east border of the Mcnee Family Limited Partnership property, the Don Rice property and another property. The back east borders of parcel sites #71 and #72, borders the Mcnee property. The previously mentioned live stream that flows both, through and within sites #71 and #72, also flows into and through this wetland, fresh water pond and empties into the American River **and request this to be reviewed (see attached pics #3).**

315-1 cont.

At the Planning Commission meeting held on February 22, 2024, as presented to the public attendees, the present EIR was streamlined, meaning Placer County staff conducted the EIR and whom made an analysis and made recommendations that included all 72+/- proposed rezoning sites, ear-marked for RM30 zoning. Even though the Placer County staff reported that any **post project request** for development of any proposed site might require a further EIR, for CEQA to review, it appears the seemingly violation by the property owner NOT seeking a CARP authorization, prior to rezoning approval, and **NOT** considered in the EIR, should be addressed for sites #71 and #72, **NOW,** instead of after the fact. It also appears that the property owner(s) acted in a way according to their own desires and assumptions, without any approved grading permits. The fact that neither the Placer County planning nor the building departments supervised any activity on either of these two sites can be indicative of the property owner(s) present and future behaviors of not abiding by any set policies and rules of either of both

departments nor by the requirements of the Placer County Conservation Program (PCCP) which is a major concern. The lengthy information written in the DEIR, that explains the purpose, responsibilities, guidelines and types of vegetation and protected species by the Placer County Conservation Program, must be adhered to and therefore, **it is requested for sites #71 and #72 to be investigated for violating not only permit requirements but also for violating any PCCP requirements.**

We appreciate your consideration of what we have presented to you and hope this can be expedited for approval of a thorough and timely investigation.

Respectfully,
Al Lauer and Kelley Moreno
Megan Moreno
Ken Magee and Antoinette Fabela
Richard and Linda Schlais
John and Wendy Shingle
Mark Cardin
Mike Kelly
Matt and Mahala Archer
Nancy Nebilak and Travis Rose
Maggie Henning
Mike Kelly
Tom and Deb Faciana

315-1 cont.

LETTER 315: KELLEY MORENO

Response to Comment 315-1

Please see Responses to Comment Letter 313.

Letter 316

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: High-density housing development on Lincoln Way
Date: Wednesday, March 13, 2024 1:03:59 PM

From: Terry Mornin <rtmornin@gmail.com>
Sent: Wednesday, March 13, 2024 11:35 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: High-density housing development on Lincoln Way

316-1 Please do whatever you can to stop the development of the high-density housing project proposed for Lincoln Way in Auburn. The traffic congestion in this residential neighborhood would pose a huge risk to the children and adults, including my wife and me, who walk and play in this area.

Terry Mornin
418 Olive Orchard Dr, Auburn
(530) 852-2972

LETTER 316: TERRY MOMIN

Response to Comment 315-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Responses to Comments 2-12 and 2-14.

Letter 317

From: jeffrey@khmossco.com
To: Placer County Environmental Coordination Services
Cc: Kally Kedinger-Cecil
Subject: Housing Element Sites Rezone
Date: Monday, March 18, 2024 11:03:05 AM

317-1

Kally, a review of the draft EIR shows District 4 Candidate Rezone Sites – South Penryn parcels 21 & 22 still included in the Draft EIR.
It was my understanding that these parcels were removed along with others at the request of the property owners.
I would like to confirm that property shown on figure 3-5 page 3-11 of the Project Description are not still included in the project.
If this is correct then the project description in the EIR does not accurately reflect the project and should be updated to reflect the actual properties included in the rezone. A better environmental review can be done if it concentrates on a smaller number of parcels.
Please confirm for me the status of these two parcels , are they officially removed from the project?
Is there any chance of them being included at a later date?
If there is a published list of parcels remaining in the project may I please get a copy?

Thank you,

Jeffrey Moss
Project Manager
K.H. Moss Company
9970 Hadleigh Drive
Granite Bay, CA 95746
916-791-7200 ext. 302

LETTER 317: JEFFREY MOSS

Response to Comment 317-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed on page 3-3 of the Draft EIR, the proposed project, as defined in the Draft EIR, is comprised of 72 properties totaling approximately 235.1 acres. While the Board of Supervisors is considering a smaller number of sites to rezone, this does not necessitate revisions to the Draft EIR analysis, which remains adequate. Further, the Draft EIR acknowledges that the final list of sites to be rezoned is expected to ultimately contain fewer properties and acreage as the list is refined.

Letter 318

From: Tariq Munir
To: Placer County Environmental Coordination Services
Subject: 3865 Old Auburn Road
Date: Monday, March 18, 2024 2:57:07 PM

Dear Board of supervisors

Hello name is Tariq Munir and I applied for a rezoning project

318-1

People that work here are commuting to work , due them not being able to afford living in the area.
There are so many other reasons, including parents who already live in Granite Bay, but their children and grandchildren cannot afford to live here.
Many state and government workers want to live here for better schools and quality of life, but they cannot afford it.

Please consider this project, as it will benefit the entire community

Thank you for your time
Tariq Munir
916-807-4074

LETTER 318: TARIQ MUNIR

Response to Comment 318-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 319

From: Susana Munoz
To: Placer County Environmental Coordination Services
Subject: Property in Granite Bay
Date: Friday, March 8, 2024 7:29:50 AM

319-1 No building on that land. Do not destroy our beauty and wildlife areas. Remove this site by Cavitt from the list. You are destroying our area
Susana Munoz
Resident of Granite Bay
Sent from my iPhone

LETTER 319: SUSANA MUNOZ

Response to Comment 319-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 320

February 14, 2024

Supervisor Gustafson - As we processed further yesterday's meeting (2-13-2024), we both are still concerned with site 74 being rezoned to RM30 at any time. Current zoning appears by table 7 to be only 1 buildable acre in the current community plan but in yesterday's planning power point presentation, its rezoning would be 11 buildable acres allowing for a minimum 220 units to a max of 330 units with no mention of infrastructure costs or impact on local residents or roads or scenic space.

320-1

We believe that the current owner who spoke and no longer lives locally will continue to push our county to rezone her property. Our concern is that by rezoning her now, she is getting preferential treatment which is not available to other property owners in our plan area (ie. Pine Hills Adventist Academy or Bell Baptist, etc). To have 11 buildable acres, the 450 foot scenic corridor would have to be eliminated just for site 74. Site 74 should be considered for rezoning **only** when other area properties are open to be rezoned as the community plan is updated.

When the plan is updated, RM30 is still too dense a designation for this area due to egress from the site onto Bill Francis and New Airport and fire danger. Please encourage planners to consider lower designations (ie ½-1 acre parcels like Sleeping Child Lane) and keep the scenic space designation.

Please keep us updated on the progress of the updating of the community plan and rezoning.

Thank you (please feel free to share our concerns with other supervisors),

Art and Carol Murschel

2573 Pacer Place Auburn Ca 95603

LETTER 320: ART AND CAROL MURSHEL

Response to Comment 320-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 321

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Today"s Board Meeting
Date: Tuesday, February 20, 2024 9:23:11 AM

From: carol murschel <daisy1@ssctv.net>
Sent: Tuesday, February 13, 2024 8:49 PM
To: Cindy Gustafson <cindygustafson@placer.ca.gov>
Cc: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; daisy1 <daisy1@ssctv.net>; Sophie Fox <sfox@placer.ca.gov>
Subject: Today's Board Meeting

321-1

Supervisor Gustafson - My husband and I watched the entire meeting via zoom. Thank you for hearing our concerns in a very long meeting. Please continue to stand against site 74 at this time. Please request the state for their reasoning for the unit numbers you are required to comply with, when the auditor's office says the statistics are skewed. We would encourage our county to push back at the state requirements as they currently stand and request more time to consider proper properties and infrastructure needed so as to make rational, unrushed decisions. Thank you, Art and Carol Murschel Western Knolls off New Airport

LETTER 321: CAROL MURSHEL

Response to Comment 321-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 322

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning- Site 74 and general/community plan
Date: Tuesday, February 20, 2024 9:19:45 AM

From: carol murschel <daisy1@ssctv.net>
Sent: Monday, February 12, 2024 5:57 PM
To: Cindy Gustafson <cindygustafson@placer.ca.gov>; Sophie Fox <sfox@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Rezoning- Site 74 and general/community plan

I do have a question regarding site 74. It appears that site 74 will be rezoned but not included in the inventory. Why is it being rezoned if not in inventory and to what designation? Does the General Plan supercede rezoning it to high density housing? Could a builder still put high density units there once rezoned? Will the 450 foot scenic setback remain? Still concerned that high density housing will be developed if not carefully rezoned. Thanks, Art and Carol Murschel

322-1

Site 74 (Bell Road, 052-171-005-000): This site is 15.8 acres and is located immediately south of Bell Road and east of the intersection of Bell Road and New Airport Road in North Auburn. The existing zoning of the site is split among three zoning districts: the 188 Honorable Board of Supervisors February 13, 2024 Housing Element Program 1 - Residential Land Inventory Rezone Program All Supervisorial Districts Page 11 west portion is zoned RA-B-100-AO (Residential Agricultural, combining Minimum Building Site of 100,000 Square Feet, combining Aircraft Overflight); the central portion of the site is zoned O-AO (Open Space, combining Aircraft Overflight), and the southeast portion is zoned IN-Dc-AO (Industrial, combining Design Scenic Corridor, combining Aircraft Overflight). The Auburn/Bowman community Plan requires a 450-foot scenic setback for new lots, and the General Plan requires a buffer between residential and industrial zone districts. If the site is subdivided, the 450-foot setback would encumber the majority of the site and only a small portion of the site (approximately 1 acre) would be available for development. **This site is included in Table 7: Sites to be Rezoned but Not Added to the Inventory.**

LETTER 322: CAROL MURSHEL

Response to Comment 322-1

Please see Master Response 1 — Non-EIR/Administrative Issues.

Letter 323

From: mwac
To: Placer County Environmental Coordination Services
Subject: Comments/Questions for Housing Element Sites Rezone (PLN22-00476)
Date: Sunday, March 17, 2024 3:12:35 PM
Attachments: FedEx Scan 2024-03-17_14-29-02 Site 26.pdf

323-1

Attached, please find a document which encapsulates some of the questions, comments and concerns regarding the Draft Rezone Environmental Impact Report. Within this document are eleven pages with signatures of community members of Granite Bay requesting a formal response to all comments, questions and concerns.

This document is being transmitted on March 17, 2024, to ensure the comments are received by the Placer County Community Development Resource Agency before the deadline for comments noted as March 18, 2024, 5:00 p.m.

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Site 26
Comments and Questions

Acronyms utilized throughout the comments and questions.

- Housing Element Program HE-1 (HE-1)
- Regional Housing Needs Allocation (RHNA)
- County Residential Multifamily 30 (RM30)
- Granite Bay General Plan, new land use designation "High Density Residential 20/30" (HDR 20/30)
- California Environmental Quality Act (CEQA)
- Rezone project is comprised of 72 specific sites as included in the Draft Environmental Impact Report (EIR), Date 2.2.24
- Vehicle Miles Traveled (VMT)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

I. Questionable objectives of HE-1, Project Description as they pertain to RM-30 or HDR 20/30.

1. "Support Employment growth by increasing availability of housing that meets the needs of the workforce."(pg3-2, Draft EIR,) How does this rezone of site 26 materially impact employment growth? Employment local to site 26 is primarily retail, not administrative or work of a professional nature, hence what is the linkage to site 26 rezone and development to employment growth specifically? VMT would not be decreased due to increased housing density; "Reduce vehicle miles traveled by encouraging infill development near employment centers and services."(pg. 3-2, Draft EIR) Employment and major services are located over 7 miles away close to the I-80 and I-50 corridors. That would be a minimum of 14 miles a day times the number of residents needing to commute just to get to those corridors. Most likely, employment would be more miles away.

II. Questions relating to Employment, VMT and Pedestrian traffic.

2. "Reduce vehicle miles traveled by encouraging infill development near employment centers and services." (pg. 3-2, Draft EIR) As mentioned in my previous question to employment growth,

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

3. there are no significant employers (large employers) within close proximity to site 26. Therefore, potential residents of site 26 would be required to travel by vehicle to employment centers primarily located near the I-80 corridor and possibly the i-50 corridor. This would increase VMT based on a higher density of population, this would significantly increase traffic on Auburn-Folsom Road and Douglas Blvd.
4. Tangent to the employment and VMT issue is the fact that there is a public junior high school within feet of site 26. Currently, the traffic pattern is very hectic at the usual school hours of 8:00 a.m. and 2:30 p.m.; Fuller Road which leads to the junior high is generally packed from the intersection of Fuller and Auburn Folsom road. Further, traffic along Auburn Folsom is negatively impacted as cars seek to merge onto Auburn Folsom Road where the signal delays traffic through the Auburn Folsom corridor. Exacerbating the traffic problem, due to the increased density in housing, there would be increased pedestrian traffic utilizing the signal at Fuller and Auburn Folsom road. This would increase traffic backed up to Eureka Road which is a T intersection with Auburn Folsom road. Currently, traffic spills down to the Eureka intersection; this increased pedestrian traffic will increase the backlog of traffic on Auburn Folsom road and increase noise as well as pollution. How is the EIR addressing this issue as well as mitigation?

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

5. The draft EIR, pg. 8-29, within Section 8-Transportation section, the EIR states "The proposed project does not include any site-specific development plans, designs or proposals. Thus, the development of specific rezone sites cannot be analyzed for adequacy of emergency access at this time." Further, the draft EIR states, "Additional vehicles associated with the rezone sites could increase delays for emergency response vehicles during peak commute hours." The following mitigation response to these two negative outcomes in the analysis, such as "sirens", "Yield, right of way" are not even close to a gold standard of countermeasures which would negate the negative impact of site 26 to emergency response vehicles need for access through Auburn Folsom road and Fuller drive areas. Is site 26 development endangering lives due to this impact?
6. The California Department of Transportation (DOT) sent a letter dated 12.15.2023 (ref# 03-PLA2023-01130), of great significance in the letter, it states, "Placer County has a plan to execute VMT studies, as well as preparing a programmatic level EIR. Once the VMT analysis and Programmatic level EIR have been completed, Caltrans will review and assess each parcel development, case-by-case, as development proposals are made."(pg. 2) We in the community would like to postpone any rezoning of site 26 or approval of development plans for

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

site 26 until the community of Granite Bay has had an opportunity to review any Caltrans analysis and report for those analysis and reports that pertain to site 26. Wouldn't this course of action be prudent in assessing the impact of rezoning and any development plans for site 26?

7. Regarding the VMT analysis presented in Appendix I, CEQA, Transportation Impact Analysis (pg 55), we found no mention of Emergency Response Vehicles response times. With added congestion, seasonal factors as well as regular increased traffic due to school hours at Cavitt-Stallman Junior, increased traffic due to this site 26 plan (rezoning) would have a significant (negative) impact on emergency response vehicles access to those areas surrounding site 26. When seconds count in the Health & Safety in emergency medical response times, site 26 can only thwart the mission of saving lives and preventing serious health risks by our first responders.
8. Within the Granite Bay Community Plan, updated and approved by the board of Supervisors, July 2019; Section 10, "Recreation"; the following information is provided on page 160, "According to Folsom Lake State Recreation Area Resource Inventory, total park attendance in 2000 was 1.57 million. Of that, 508,000 accessed via the Granite Bay entrance and an additional 220,000 utilized Beals Point. Forty-six percent of users accessed the State Park

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

through Granite Bay." There is a need to update these attendance numbers, but it is only prudent to say that those numbers are far below what the park has been experiencing in the recent past or decade. What should be of concern is the VMT by visitors and consequential traffic congestion to the Folsom Lake which is accessed via Auburn Folsom Road and Douglas Blvd. Auburn Folsom Road borders one side of site 26, and Douglas Blvd. is approximately ½ mile away from site 26 and Fuller Drive, which is the other border of site 26.

9. Further contained within page 160 of section 10(Recreation) of the Granite Bay Community Plan, it states the following; "Capacity is a concern at Granite Bay, particularly during peak season weekends when the day use parking area and launch ramps at the launch ramps area fill by midday. There is one entrance to Granite Bay at Douglas Blvd. and one entrance to Beals Point at Oakhill Drive. Significant backups occur along the roadway and onto Auburn Folsom Road when the parking areas fill." Those of us who have lived in this area for some time can attest to the fact that once the 460 spaces at Beals Point fills up, visitors begin to park on the side of the road on Auburn Folsom road, Crown Point Vista (residential area, Oakhill Drive (residential area), Muir Way (residential area) and Fuller Drive. With an increased housing density at site 26, there

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

is a significant possibility of conflicts with future tenants at site 26 with the visitors to Lake Folsom, especially during peak season. Traffic congestion would be serious and this could reduce the right of way for first responders, causing lifesaving delays for services needed. I could not find where this dilemma is addressed in the Draft EIR. Please provide analysis and/or response how these issues would be addressed.

III. Questions/comments related to CEQA

10. The California code, Public Resources Code PRC 21159.25 "Infill Housing in Unincorporated Counties (CEQA) states "The project is consistent with general plan and zoning." As stated in the EIR, this rezoning project is not consistent with the general plan. Even though the general plan can be amended, what forum would be provided to amend the general plan to the community? If the general plan reflected the values and needs of the community, what would you consider a project that violates that plan by considering site 26? What other county property is available for HDR 20/30?
11. Within the same paragraph the CEQA also states, "The project site is less than 5 acres." It appears that the project site (site 26) contemplates rezoning 17 plus acres at site 26. What is being contemplated beyond the

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

single development which may occupy 5 of the 17 acres?

12. The California code, Public Resources Code PRC 21159.25 "Infill Housing in Unincorporated Counties (CEQA), "The project site will not cause significant effects relating to transportation, noise, air quality, greenhouse gas emissions, or water quality." As I mentioned in another comment/question, it appears that an increase in density at the intersection of Fuller and Auburn Folsom would significantly increase all the factors related to transportation as cautioned in CEQA. How is this being resolved within the guidelines of CEQA? What about seasonal traffic to Lake Folsom as it relates to Beals Point and Folsom Lake Maingate?
13. Continued within The California code, Public Resources Code PRC 21159.25 "Infill Housing in Unincorporated Counties (CEQA), "The project is within ½ mile of a major transit stop." If a transit stop is referring to a bus stop or light rail, I am not aware of any transit service available within ½ mile of site 26. How is the county reconciling this anomaly with CEQA?

IV. SB 423 Questions

14. Section 1. (e) of SB 423 states, "Least cost zoning law (Section 65913.1) of the government code. 65913.1 refers to housing development costs as a barrier to be overcome in producing

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

affordable housing; of great concern is Health & Safety in this paragraph. Per the draft EIR, page 10-26, Health 7 Safety Element, Policy 3, it states; "Continue a program whereby new development pays the cost of new capital improvements necessary to provide the fire district with new fire stations, equipment and apparatus necessary to maintain the desired level of service, and to serve new development in the Granite Bay Area." On page 10-37 of the draft EIR, South Placer Fire Protection District(SPFPD) confirms that the district has insufficient staffing to adequately serve the new residences that could be considered reasonably foreseeable as a result of the proposed project. This points to increased capital cost outlays as well as increased need for staffing which would impact the cost of the project, directly or indirectly. Further, SPFPD states they have certain necessary equipment and facilities exist, but due to funding they are not operational. This would increase the cost of this project and would be necessary in ensuring the Health & Safety of all Granite Bay citizens. Before any rezoning or project being built, it would seem mandatory that these resource factors be addressed. Therefore, it would seem prudent to drop site 26 from the proposed rezone plan contemplated by this draft EIR.

15. As noted in comment/question #7, we are not aware of any Major Transit Stop within ½ mile

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

of site 26; will this mandate the county introduce a Major Transit Stop? At what cost? Where would it be located? What tangent properties would be impacted?

V. Other Issues

16. Folsom Lake is a state recreational area, however development on site 26 could have a negative impact on the safety and health of the lake's environment as well as endangering wildlife, since there is no barrier to entering the lake from the junior high parking lot which is only feet away from the proposed development site 26. There is an unsupervised shoreline accessible through the parking lot of the junior high school, so it is foreseeable that during summertime, residents or friends of the residents may utilize the lake creating a possible danger since this area is not monitored. Further, there are no facilities such as restrooms in that section of the lake, causing an inconvenience as well as possible Health & Safety issues. Has the Department of Parks and Recreation been informed of this possibility? What liability could the State and Placer County incur for Health & Safety issues relating to this portion of the lake?
17. Finally, there are many "Goals" of the Granite Bay Community Plan that are violated by this proposed rezoning and development of site

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

26. Most egregious of these violations being the potential lack of public stewardship directed to restoring, enhancing and maintaining the natural environment. Any development of site 26 would be out of character with the community within which site 26 resides. The values, priorities and quality of life standards promoted by the Granite Bay Community Plan are those of the citizens who make up the community. How is it Placer County can ignore, seek to change the Granite Bay Community Plan wholesale without seeking out the will of the citizens of Granite Bay? That will is already expressed in the existing Granite Bay Community Plan.

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

We, represented by the signatures to this comment and questions document respectfully request responses and answers individually or corporately from each Placer County Board Supervisor and all other Placer County departments and officials making decisions relative to the rezoning and development of Site 26 as noted and defined in the draft EIR.

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Print name

Email Address

Signature

DAN AHMAD

Print name

DAN@PEAKFIN.com

Email Address

SIGNATURE PAGE(S)

Signature

Rachit Bhasin

Print name

rachitbhasin@yahoo.com

Email Address

(1)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Signature

Print name

MIKE A. CLARY

Email Address

MCLARY4839@yahoo.com

SIGNATURE PAGE(S)

Signature

Valerie D. Houghton

Print name

Validated@Surewest.net

Email Address

Signature

Gregory Houghton

Print name

Validated@Surewest.net

Email Address

Signature

(2)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Print name

Email Address

SIGNATURE PAGE(S)

Signature

LISA DAMON

Print name

LADAMON59@YAHOO.COM

Email Address

Signature

THERESA M. CLARY

Print name

freesac25@gmail.com

Email Address

(3)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Print name

Email Address

SIGNATURE PAGE(S)

Nabil Hamdan
Signature

Nabil Hamdan
Print name

nhamdan84@yahoo.com
Email Address

Rick Damon
Signature

Rick Damon
Print name

ricklisadamon@yahoo.com
Email Address

Signature

(4)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Signature

Kirk J Staggs

Print name

KStaggs@pacbell.net

Email Address

LAN DELATORRE

Signature

Lan DeLatorre

Print name

landelatorre@yahoo.com

Email Address

5

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

SIGNATURE PAGE(S)

Signature

Alan Bumgarner

Print name

abumgarn@gmail.com

Email Address

Signature

Print name

Email Address

Signature

(6)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Orna Ovadia
Signature

Orna Ovadia
Print name

oboradia@yahoo.com
Email Address

Boaz Ovadia
Signature

Boaz Ovadia
Print name

oboradia@hotmail.com
Email Address

Signature

Print name

Email Address

(7)

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Signature

George Kievlan JR 408-9689389
Print name

GKievlan@Surewhist.net
Email Address

408-968 9398
Signature

Joanne Kievlan
Print name

Email Address

Signature

Joseph De La Torre
Print name

itrad7@gmail.com
Email Address

8

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Soraya H. Foutouhi

Print name

shfoutouhi@gmail.com

Email Address

Signature

Ehssan Ghassemi

Print name

ehssan@gmail.com

Email Address

Signature

Print name

Email Address

Signature

9

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Maya Reddy
Signature

Maya Reddy
Print name

mayareddy345@gmail.com
Email Address

Signature

Print name

Sureeha Reddy
Email Address

sunreddy100@gmail.com
Signature

Print name

VINAY REDDY
Email Address

VREDDY@SPINENERVE.COM.

16

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT, DATED 2.2.2024

Proposed Project: Housing Element Sites Rezone (PLN22-00476)
State Clearinghouse No. 2023100581

Property Map Number 26, APN 047-150-053-000

Signature

Robin Saros

Print name

925 395 7606

Email Address

Signature

Print name

Email Address

Signature

Print name

Email Address

(11)

LETTER 323: MWAC

Response to Comment 323-1

Please see Responses to Comment Letter 18.

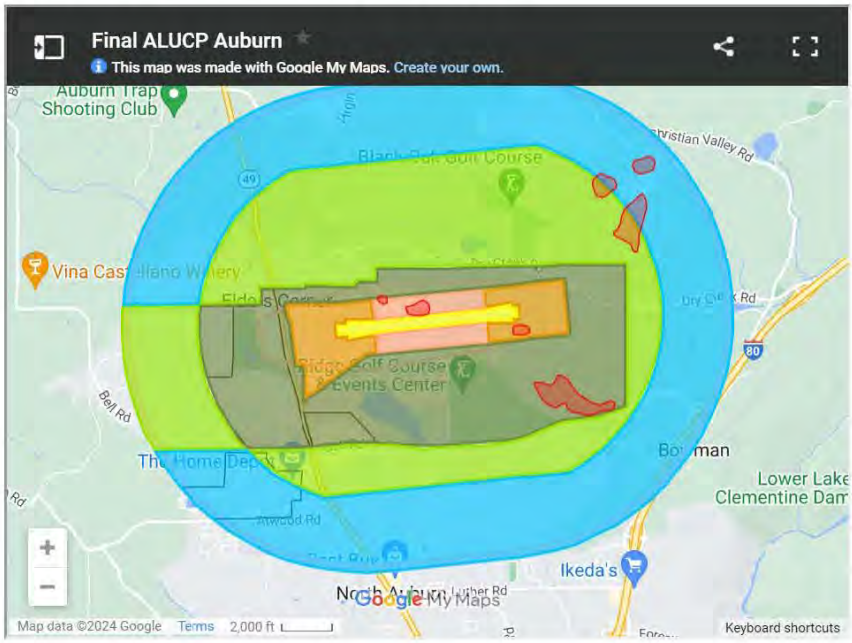
Letter 324

From: Bruce Nagle
To: Kally Kedinger-Cecil; Placer County Environmental Coordination Services; Board Clerk
Subject: Answer to my question at last Public Meeting and concern over North Auburn Proposed VLIH - Property Map Site 74
Date: Saturday, February 3, 2024 7:19:45 AM
Attachments: image002.png

I am Bruce Nagle, my wife and I reside at 1601 Cornell Way, Auburn. I attended the last meeting whereby you were hosting a public discussion about the entire Placer County VLIH initiative. We have concerns over Property Map Site 74. I asked a question at that meeting regarding, ***at what point does the zoning guidelines and restrictions for the Auburn Airport get reviewed/assessed in relation to the expediated planning process you are working towards currently,*** to comply with the state of California mandates. However, I work full time and could not stay for the response to my question. Can you provide that answer to us please. 324-1

It appears to me, Property Map Site 74, falls with the Final Airport Land Use Compatibility Plan (ALUCP). As such, it would be incredibly dangerous, one would think to allow development of a high-density housing development within the footprint of the current and soon to expanded, aerial traffic overhead. One would also conclude, approval for this type of development would also create legal exposure, in the event of a tragedy created by a plane crash into this type of development, once approved by the county for Placer County.

Auburn Municipal Airport Influence Area



Thanks, Bruce Nagle

LETTER 324: BRUCE NAGLE

Response to Comment 324-1

The Placer County Airport Land Use Commission (ALUC) is responsible for reviewing projects within the boundaries of Aircraft Overflight zones to determine if projects are compatible with the Airport Land Use Compatibility Plan (ALUCP). Site 74 is within Compatibility Zone C2, where multifamily residential is a "normally compatible." On February 28, 2024, the ALUC took action to determine the proposed rezone program is consistent with the 2021 ALUCP.

Letter 325

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning of Dry Creek Sites 7, 8, 9, 10
Date: Tuesday, March 19, 2024 10:55:41 AM
Attachments: Outlook-4ydf2o42.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:04 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Rezoning of Dry Creek Sites 7, 8, 9, 10

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Kate N <kankan247@msn.com>
Sent: Friday, March 1, 2024 10:42 AM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Rezoning of Dry Creek Sites 7, 8, 9, 10

Dear Placer County Board of Supervisors:

325-1

I am a homeowner in American Vineyard Village community off of Vineyard Road. I do not approve of the proposed sites for low income housing in the area (parcel sites 7, 8, 9, and 10). This would be detrimental to the surrounding neighborhoods. Low income housing would decrease home values and increase safety concerns. Low income housing requires more localized services and public transportation, and this area has neither of those resources. This proposal is not feasible due to the lack of services and does not make any

325-1 cont.

sense for this area. The plan to maintain low density housing and open space needs to continue.

Once again, I oppose this proposition to turn the parcels into low income housing.

Thank you,
Katie Nahorn

Sent from my iPad

LETTER 325: KATIE NAHORN

Response to Comment 325-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 326

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:29:21 AM

-----Original Message-----
From: Karen Nault <k.nault@hotmail.com>
Sent: Friday, March 8, 2024 5:11 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD staff,

I am writing to express 4 concerns and register my vehement opposition regarding the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

326-1

I moved to my current home on East Drive (corner of East and Carol) almost 11 years ago. The semi rural atmosphere and 1+ acre parcels were just what I was looking for after moving from the wildfire prone Rollins Lake area in Nevada County. I was going to retire very soon and was looking for an established, stable countrified area and spent months looking for the right property. When I moved in I was welcomed by many neighbors and found out that many homeowners had been in their homes 40-50 years+ and had raised their families in their current houses. Several homes had been passed on through generations. It is a community that appreciates and values the uniqueness and significance of one of the last vestiges of rural living on the periphery of suburbia.

Concerns:

326-2

1. I think it is problematic that several major developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as Martinez vs city of Clovis which partially dealt with the city of Clovis not working to actually build low income (affordable) housing as they were suppose to.

2. The places that have been chosen in District 1 are long established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (ie water table and flood issues). The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought on by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address - since this was never an intended land use in their 1-2 acre residential community.

3. The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of 'underutilized' land is a subjective measure. For example, saying a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly 'underutilized'. Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city —not a county- where space would be limited. These new developments are 100's of acres of land that have the ability to install infrastructure that would support high density low income housing.

4. This plan did not involve public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems each site and also potential alternatives that are actually viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the draft EIR for properties proposed in District 1, one of which is directly across

326-2 cont.

from Creekview Ranch School.

For these reasons I believe the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

326-3

The current rezoning proposals have failed to include key stakeholders and have loosely promised to mitigate issues that have been brought forward in recent forums. I feel there has not been enough attention to the inappropriateness and hasty 'hurry hurry' that has county leadership looking for quick solutions to a long standing problem and failure to hold developments accountable to their 10% obligation. County leaderships failure to create accountability should not be a burden placed on well established communities!

Karen Nault
2060 Carol Lane
Roseville, Ca
Sent from my iPad

LETTER 326: KAREN NAULT

Response to Comment 326-1
Please see Responses to Comment Letter 62.

Response to Comment 326-2
Please see Responses to Comment Letter 62.

Response to Comment 326-3
Please see Responses to Comment Letter 62.

Letter 327

From: Nancy Nebilak
To: Placer County Environmental Coordination Services; Antoinette Fabela
Subject: no on rezoning lot 71 and 72
Date: Thursday, March 14, 2024 8:30:58 PM

Hello,

327-1

I am writing to voice my opposition to the rezoning of lots 71 and 72 to high density housing. The current zoning, rural suburban, is what the zoning needs to continue to be, as in keeping with the surrounding community. Adding 200 or 300 multi story units on this small area makes no sense. Are you even aware this is on a blind curve where countless traffic accidents have occurred? What about the impact this will have if there is a fire? This is an area that is not easy to get out of in a wildfire. If you live off Foresthill Ave or Russell Rd. you are already very limited to escape routes, don't make it worse. Plus Lincoln Way can't handle any more traffic! What about the native flora and fauna that inhabits this area and the surrounding area? The owner of this land has already shown how little he cares for anyone who lives on surrounding properties, or the native plants and animals. He bulldozed out all the trees and plants, and destroyed the home to native insects, bees and animals! Who knows how many trees he killed in his path of destruction. Not even a permit for it. It's a disgrace. The folks below are getting muddy runoff from the rains because he didn't even have the decency to put any erosion control down. I'm sure he wants this high density rezone to go through so he can line his pockets. This is not the place for this type of high density development.. Try down by the casino in Lincoln. That area is flat and ready for large scale development. Not this small downhill canyon slope in a severe fire area.

Thank you

Nancy Nebilak

LETTER 327: NANCY NEBILAK

Response to Comment 327-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Responses to Comments 2-12, 2-14, and 174-2.

Letter 328

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: High density house on sites 71 and 72 by Alta Vista School
Date: Wednesday, March 6, 2024 3:22:51 PM

From: Nancy Nebilak <nancynebilak@gmail.com>
Sent: Wednesday, March 6, 2024 3:14 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: High density house on sites 71 and 72 by Alta Vista School

Dear Kally,

328-1

I am extremely opposed to the proposed high density housing development at the area behind Alta Vista school, bordered by Lincoln Way and Russell Rd. Hundreds of housing units, environmental degradation and destruction of the wooded area bordering the neighborhoods, as well as an unimaginable amount of traffic on Lincoln way and Russel Rd? The existing road infrastructure cannot handle any more cars. There is already too much traffic.

We do not want corporate enterprise destroying our way of life. After living here for 39 years, I find that the Auburn I moved to and loved, is turning into another big ugly crowded city! This is unconscionable ! Put it out by the shopping areas, not in a rural area! This is not right for this area!!!!

Has there been an environmental impact report done? Why has a road been cut in and trees cut down and brush cleared already? Was this cleared with the county/city authorities? I know there are laws in place for tree removal.

Please send me a copy of the environmental review report on file. If there is not one please let me know.

Please, please don't let this natural habitat be destroyed forever. Its unbearable to even think about it.

Thank you,

Nancy Nebilak

LETTER 328: NANCY NEBILAK

Response to Comment 328-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 5 – Programmatic EIR vs. Site-Specific EIR, and Responses to Comments 2-12, 2-14, and 174-2.

Regarding habitat concerns, it is noted that the subject parcel is located within the boundaries of the Placer County Conservation Program (PCCP). PCCP General Condition 3 requires payment of Land Conversion Fees for impacts to any natural land cover including oak woodlands, oak savannah, annual grasslands, etc. That Land Conversion Fee does not simply go into a fund, but is utilized by the PCA to purchase and preserve the same acreage of that land cover type at an off-site location. The PCCP contains provisions requiring the PCA to replace impacted habitat within a stated time frame. As a result, although impacts to habitat would be considered a significant impact, participation in the PCCP and payment of the Land Conversion Fee mitigates those impacts to a less than significant level.

Letter 329

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element Amendment Available for Public Review
Date: Thursday, March 7, 2024 4:27:27 PM

From: Jane Negri <grammynegri@yahoo.com>
Sent: Thursday, March 7, 2024 3:13 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Megan Wood <MWood@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; Jane Negri <grammynegri@yahoo.com>
Subject: Housing Element Amendment Available for Public Review

We moved to this area when Sunrise Mall was built by our home in Citrus Heights. We wanted to raise our family in a rural environment. I have been in my home for 49 years. I participated in writing the first Granite Bay Community Plan in 1989 and spent about 2 years revising the GBCP, completed in 2012. The Plan offers many different types of zoning, including High Density. The GBCP was honored and respected for many years. Then developers realized that our representatives would make exceptions to the plan in many areas. Re Zoning by 3 to 4 times the original zoning or more began to destroy our rural community. Our County Supervisors and Planning Commission ignored the development of 10% low income housing. Developers were given a low in leiu of fee by Placer County while we asked for the 10% low income housing.

329-1

Now we are being asked to bear the burden of poor planning by destroying our rural environment and quiet peaceful neighborhoods with the addition of high density projects that will change our forever homes. Placer County has known about the ReZone Element for over 6 years. There have been 1,000's of homes and apartments built without the 10% low income zoning in that time. The County now wants to use"streamlined planning" to fix their problem. File for an Extension before you place us in unsafe neighborhoods. If it doesn't work at least you tried. You are the representatives of the citizen's of Placer County. We should not have been ignored when we spoke about the dangers and ruin this would bring to Granite Bay and all communites in Placer County. We should not have our lives ruined because you didn't listen to our well reseached presentations.

I am writing this piece of history because none of the parcels in Granite Bay that will put our lives in danger were removed from the list.

You can still make changes , please put people ahead of numbers or ease of development. Thank You, Jane Negri

LETTER 329: JANE NEGRI

Response to Comment 329-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 330

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: DEIR ReZone Placer County
Date: Tuesday, March 19, 2024 8:39:06 AM

-----Original Message-----
From: Jane Negri <grammynegri@yahoo.com>
Sent: Friday, March 15, 2024 1:45 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Bos@placer.ca.gov; Megan Wood <MWood@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Sandy Harris <sandyhar@surewest.net>; Cheryl Berkema <cheryl.berkema@gmail.com>; Dan Woodward <dan.woodward@arnold-air.org>; Diane Will <diane@connertywill.com>; Mary Ann Stinson <MOStinson@surewest.net>; GARY DAHLBECK <dahlbeck1@aol.com>; Jane Negri <grammynegri@yahoo.com>
Subject: DEIR ReZone Placer County

330-1

I am sending you this information to illustrate that an individual EIR is needed for each parcel in Granite Bay that is now on the list for high density rezoning.

Our Granite Bay Community Plan has directed development in our area since 1989. There were massive violations of the GBCP under our last Supervisor and Planning Commissioner.

Our current Granite Bay representatives respect and value the Plan as does the community. The following information is a listing of some of the Goals and Policies that should require an EIR to receive approval for this project.

" 1.6 General Community Goals :1.Protect and preserve the unique rural character of the community and maintain the identity of Granite Bay as a scenic ,tranquil, family-oriented rural/residential community compatible with the area's physical constraints and natural features.

4.Conserve the visual and aesthetic resources of the community including significant vistas, oak woodlands, and grasslands, and minimize the disturbance of the natural terrain.

1.7 General Community Policies : 9. Plan for growth in a manner that is sensitive to the natural environment .

3. Land Use:

Land use policies are designed to prevent overuse of land and control intensity of use. The overuse or overcrowding of individual sites with buildings, structures and/or accessory uses can create environmental impacts such as excessive traffic, drainage problems, soil erosion , loss of vegetation and other resources, and can destroy the open, rolling terrain, and natural characteristics of the community.

3.1 Goals 2. Require planning and design that ensures compatibility among neighboring land uses .

3.2 Policies 6.Provide transitional land uses or a landscaped buffer wherever necessary to minimize the conflicts inherent to adjoining properties of different zoning intensity, density, or adverse uses.

9. Buildings shall be of a size and scale conducive to the character of the immediate neighborhood.

11.To preserve the character of the community, land use changes shall be considered only if: a. The change can be designed and implemented to be consistent with the contiguous properties. In determining consistency, all elements of the Community Plan shall be reviewed. b. The change is consistent with or adequately buffered from contiguous properties and will provide for a reasonable transition between land uses . c. The change shall not significantly impact the level of services provided in its vicinity and there will be adequate infrastructure to serve the proposed development. d. The development is effectively screened so as not to be perceived by the public as high density .

Specific Polices for Intensity of Use : 4. Intensity of use of individual parcels and buildings shall be governed by consideration of health and safety; impact on adjoining properties due to noise, traffic, night lightening, or other disturbing conditions ; and protection of natural land characteristics.

330-2

These Goals and Policies were included to protect our community from the high density development that is being forced on Granite Bay now. Parcel #26 and 23 should be reviewed in light of this information.

All the other rural communities of Placer County are experiencing the same threats to their quiet lifestyle in their forever homes.

330-3

Change your direction away from endangering Placer County citizen's lives. Make those other parcels that you failed to explore work for the safety and peace of all Placer County.

Thank you for carefully reading every word from the GBCP. These parcels cannot be developed without a complete EIR to protect our community.

Thank You, Jane Negri
grammynegri@yahoo.com
March 15, 2024

Sent from my iPhone

LETTER 330: JANE NEGRI

Response to Comment 330-1

Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

The comment also provides overall goals and policies and land use goals and policies from the Granite Bay Community Plan. This information does not address the adequacy of the Draft EIR and has been forwarded to the decision-makers.

Response to Comment 330-2

The proposed project does not include any site-specific development plans, designs, or proposals at this time. However, the reasonably foreseeable consequence of approval of the proposed rezones is future development of the rezone sites with high-density residential uses. As discussed previously, future development within the RM30 zone district would be subject to the development standards and design guidelines established in the County's Multifamily and Mixed Use Design Manual. The County's purpose in developing the Manual was to provide a better framework for the design of future housing development and the permit approval process, ensuring a good fit for multifamily and mixed use projects within existing communities in unincorporated areas of the County. The development standards and design guidelines included in the Design Manual are intended to address private development and its relationship to neighboring properties and to the public realm.

Response to Comment 330-3

This comment is a concluding statement recommending that the Granite Bay Community Plan be followed. This comment does not address the adequacy of the Draft EIR and has been forwarded to the decision-makers.

Letter 331

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: DEIR ReZone Placer County
Date: Tuesday, March 19, 2024 10:53:15 AM

From: Jane Negri <grammynegri@yahoo.com>
Sent: Monday, March 18, 2024 3:43 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Megan Wood <MWood@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>
Subject: DEIR ReZone Placer County

331-1

The design of the Bayside site is changing and the DEIR needs to respond to any such changes and requirements for emergency access. The DEIR needs to respond to notications being sent by neighbors and the traffic impacts.

It was noticed in the NOP comments that there was a letter from Bayside stating that the acreage was incorrect and that the entry was on Douglas and an emergency access could be provided from Cavitt Stallman. This change occuring at this time calls for a real not a programatic EIR.

A project level EIR is required for this ReZone. Thank You, Jane Negri
grammynegri@yahoo.com

LETTER 331: JANE NEGRI

Response to Comment 331-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 332-2.

Letter 332

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Current 16 parcels listed for rezoning
Date: Tuesday, February 20, 2024 9:24:17 AM

-----Original Message-----
From: Jane Negri <j.negri@icloud.com>
Sent: Wednesday, February 14, 2024 12:28 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; chrispahule@placer.ca.gov; Suzanne Jones <SuzanneJones@placer.ca.gov>; Christopher Schmidt <CRSchmid@placer.ca.gov>; Sandy Harris <sandyhar@surewest.net>; cheryl.berkeman@gmail.com; Mary Ann Stinson <MOStinson@surewest.net>; GARY DAHLBECK <dahlbeck1@aol.com>; Jane Negri <grammynegri@yahoo.com>
Subject: Current 16 parcels listed for rezoning

332-1

I was not able to attend yesterday's meeting in person due to illness. However I did listen until the close on Zoom. I had my hand raised to comment but was never called on to speak.

I had 3 items to mention. First, for all of us who could not attend please post the list of the 16 sites, by their number, that are still on the list. I have looked at the maps but names of roadways are missing and I can not identity where the parcels are located precisely. Thank You.

332-2

The second item is Bayside #23. I was going to talk for the neighbors in the area and remind the BOS that just 2 years ago they had open space that was promised to all of us in Granite Bay taken away with the installation of a Soccer Field. There was a huge number of neighbors that have lived in the area on I-5 area parcels for many years, that came to protest the noise, lights, traffic, air quality, and the loss of their peace and quiet in their forever homes.

Bayside made a commitment to the Community that the last 3 plus acres would indeed be saved for open space. I do not think these neighbors received any notification and I was coming to speak for them to defend their property rights against building 64-96 apartments across the street from some and creating an unsafe traffic nightmare for all of the area. The property is zoned Rural Estate 4.6-20 acre. I know this is a rezone and I think this parcel has been removed. I wanted you to know about all the stress and anguish this neighborhood has already experienced.

332-3

The third item concerns what was said after most of the audience had left. During the public discussion Bell Rd and Auburn Folsom parcels were mentioned frequently. It was suggested right away by Supervisor Holmes to remove Bell Rd and another parcel, everyone seemed to agree. Then Our Supervisor Suzanne Jones spoke up and asked to have parcel 26 removed due to the extreme traffic hazard it would create in an area that was one of the most dangerous in Placer County. We all heard the comments from the audience about the fatalities due to excessive traffic and unsafe driving on Auburn Folsom and Douglas Blvd. One gentleman that lived across from Eureka Rd on Auburn Folsom spoke about 4 people he had witnessed die, I think in the last five years.

However no Supervisors spoke up to agree that this parcel should definitely be removed. Then Chris Pahule said the parcel had already been approved by the State. This was for another development years ago. The people of Placer County believe the safety of their citizens is more important than prior approval that will just let this dangerous parcel slip right onto the list. It does not have to be on the list just because it was approved. After hearing the testimony of many residents from the Auburn Folsom/ Douglas area and residents from all of Granite Bay our BOS and Chris Pahule should be the first to stand up and say remove this dangerous parcel. I did not hear of any other parcels where 4 deaths had occurred in the past five years.

All the members of the audience who spoke in favor of removing parcel 26 were not even there to hear the reason given by the Planning Division for keeping it on the list. It was spoken as if it was a," done deal". Nothing is a "done deal" where the lives of Placer County citizens are concerned.
Please reevaluate this decision in light of protecting all the people who pass through this area.

332-4 Thank you for all the work you have compeleted and the many hours you have invested in this monumental task.

Jane Negri
4502 Olive Ranch Rd
Granite Bay, 95746 916 791 0846 grammynegri@yahoo.com

LETTER 332: JANE NEGRI

Response to Comment 332-1
This in an introductory comment and asks that the reduced candidate rezone sites be put on the County website. This has been completed.

Response to Comment 332-2
Please see Response to Comment 16-1.

Response to Comment 332-3
This comment is in regard to Rezone Site #26 on Auburn Folsom Road and Site 74 on Bell Road. The commenter notes that a Supervisor asked that Rezone Site #74 be removed due to traffic safety issues but the mentioned traffic safety issues on Rezone Site #26 were ignored. The commenter also states that the Planning Director said the "parcel had already been approved by the State." Site 26 was in the Housing Element Land Inventory of Vacant and Non-Vacant Land (Table A-3) and also was listed as a "Candidate Rezone Site". The Housing Element was approved by the State Department of Housing and Community Development.

The comment also asks that the decision to keep Site 26 on the rezone site be reconsidered. This comment has been forwarded to the decision makers.

Response to Comment 332-4
This comment is a closing statement. The County appreciates the appreciation.

Letter 333

From: Jane Negri
To: Meghan Schwartz
Subject: Re: Housing Element Sites Rezone (PLN22-00476) DEIR
Date: Friday, February 2, 2024 3:55:18 PM

333-1

Thank you for this early release. When I was notified that it would be released Feb 14 the day after the BOS Workshop on Feb 13 , I was going to write and state how unfair that was to the public . I'm thankful you must have received many complaints and moved the release date up to today. Now we can actually read it before we attend the workshop. Thank You, Jane Negri
Sent from my iPhone

On Feb 2, 2024, at 1:37 PM, Meghan Schwartz <MSchwartz@placer.ca.gov> wrote:

The Draft Environmental Impact Report (DEIR) for the subject project has been released for public review from **February 2, 2024 thru March 18, 2024**.

The Notice of Available of the Draft EIR is attached for your convenience, and you can view/download the DEIR at the link below:

Housing Element Sites Rezone | Placer County, CA

The Planning Commission will accept verbal comments on the DEIR at the following meeting:

Thursday, February 22, 2024

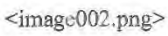
A public meeting will be held on February 22, 2024, to receive comments on the Draft EIR. Public comment will be offered in-person and virtually:

- In-Person: Placer County Planning Commission, Planning Commission Hearing Room, Community Development Resource Center, 3091 County Center Drive, Auburn, California.
- Virtually through a Zoom meeting webinar.

The Placer County Planning Commission meeting will begin at 10:00 a.m.; however, the proposed project is not time certain. Please refer to the meeting agendas at the following link up to 1 week prior to the meetings for updated information:
https://www.placer.ca.gov/AgendaCenter/Planning-Commission-53

Meghan Schwartz, CDRA Technician
Community Development Resource Agency
3091 County Center Dr, Suite #190
Auburn, CA 95603
(530) 745-3075
mschwartz@placer.ca.gov

<image001.jpg>



<NOA_DEIR.pdf>

LETTER 333: JANE NEGRI

Response to Comment 333-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 334

From: pneifer
To: Placer County Environmental Coordination Services
Subject: Housing Element Rezone DEIR Comments. Neifer
Date: Tuesday, February 20, 2024 12:27:21 AM

Dear Placer County Planning Commissioners,

The DEIR contains a letter from the State Department of Toxic Substance Control listing specific deficiencies and concerns with the DEIR.
Below is an excerpt from the letter.

"Based on the information provided in the NOP, DTSC believes that additional assessment of potential impacts and hazards is warranted. DTSC agrees that this project may pose significant effect on the environment; preparation of an EIR is required, with consideration to the items identified above.
If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed, evaluated, and addressed for mining waste. Please visit the DTSC Abandoned Mine Lands webpage for reference or further guidance.
Further review should be conducted to identify the locations of the proposed project site and clarify whether they are listed as having documented contamination, land use restrictions, or whether there is the potential for the project site to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, DTSC recommends providing further information on the project site and areas that may fall under DTSC's oversight within the DEIR.
Once received, DTSC may provide additional comments on the DEIR as further information becomes available."

334-1

Please indicate how the possibility of Toxic Substances on the proposed rezoned sites will be ruled out and evaluated.

Patty Neifer
916 934-9050
Pneifer@gmail.com

LETTER 334: PATTY NEIFER

Response to Comment 334-1

Potential impacts related to toxic substances are discussed on page 42 of the Initial Study prepared for the proposed project. Implementation of Mitigation Measure IX-1 would ensure that if a potential subsurface hazard is identified the project applicant would conduct a Phase I Environmental Site Assessment for submittal to the Placer County Division of Environmental Health, and a Phase II Environmental Site Assessment would be prepared if the Phase I identified any recognized environmental conditions and would be completed prior to approval of any improvement plans. Should the project site be referred to an outside agency, such as Department of Toxic Substances Control for oversight, the applicant would need to provide a 'No Further Action' statement or equivalent from the agency. Thus, toxic substances on the proposed rezone site have been adequately addressed at a programmatic level. Please see also Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 335

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Placer County Housing Element Rezoning Amendement comments
Date: Wednesday, March 6, 2024 3:22:47 PM

From: pneifer <pneifer@gmail.com>
Sent: Wednesday, March 6, 2024 3:20 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Christopher Pahule <cpahule@placer.ca.gov>; Andrea Dashiell <ADashiel@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Placer County Housing Element Rezoning Amendement comments

Dear Placer County Board of Supervisors, Planning Commissioners and Planning Director,

335-1 The properties added to the candidate rezone sites in the Residential Land Inventory have not received the proper vetting.

These newly added sites are not included in the EIR, so impacts have not been evaluated.

With these new properties added to the list of high density rezoned lands, the impacts, including traffic, environmental and especially lack of services are not being measured. **Is this shortcut even legally compliant?**

335-2 The identified building sites are located in school districts experiencing major financial issues, where entire schools have had to be shut down. Other sites are in school districts and fire districts where services cannot accommodate this increase in population. The Welfare Tax exemption for nonprofits, including Housing Trust Placer allows affordable housing developments to be exempt from paying property taxes to support schools, fire and other vital services.

335-3 Before additional sites and land is rezoned to high density housing, those properties should be evaluated adequately and follow all Planning Department requirements, including having individual Environmental Impact Reports completed before Placer County Supervisors are asked to approve the high density rezoning.

335-4 Changing existing low density and rural neighborhood zoning to accommodate high density apartments in rural areas of Placer County ruins the character of communities like Penryn and destroys scenic and serene lands. The general plan never envisioned this dramatic rezoning in rural Placer County. Other alternatives with less impacts should be explored.

335-5 New sites should not be added to the Housing Element rezoning by simply amending the plan with only a 7 day public comment period.

Patty Neifer
916 934-9050
Pneifer@gmail.com

LETTER 335: PATTY NEIFER

Response to Comment 335-1
Please see Master Response 1 — Non-EIR/Administrative Issues. The comment is unclear as all potential rezone sites are included in the Draft EIR and evaluated at a programmatic level. Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Response to Comment 335-2
Please see Master Response 6 – Impacts to Local Schools. Potential impacts related to fire protection are addressed in Chapter 10, Fire Protection and Wildfire, of the Draft EIR.

Response to Comment 335-3
Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Response to Comment 335-4
Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 335-5
Please see Master Response 1 — Non-EIR/Administrative Issues.

Letter 336

From: pneifer
To: Placer County Environmental Coordination Services
Subject: DEIR Comments for Sites 13, 17 and 18 in Penryn, Housing Element Sites Rezone Project
Date: Saturday, February 17, 2024 8:33:26 PM

DEIR Comments for Sites 13, 17 and 18 in Penryn, Housing Element Sites Rezone Project

Sites 13, 17 and 18 contain errors in services identified for the sites.

336-1 There is no grocery store within the circumference indicated.
There is no public transportation to speak of because the bus service is practically non-existent and does not meet work hour schedules or run often enough to use as public transportation or to serve the needs of residents.
The library indicated on the slide was permanently closed in 2023, so there is no library.

There are no sidewalks, bike paths or walking paths near the proposed sites. There are no medical facilities, not even a non-emergency clinics anywhere close to Penryn.

336-2 The vehicle miles traveled will be dramatically increased by building in the Penryn area where there are no services.

336-3 The DEIR lists various schools in the area, but all of the Loomis Unified School District is impacted and cannot accept additional students.

For the Penryn Fire Protection District the finding of no significant impact is incorrect. The same is true for law enforcement.

336-4 Quote: "As detailed in Chapter 10, Fire Protection and Wildfire, of this EIR, the proposed project would not increase demands for fire protection services such that new or expanded facilities would be required. Similarly, as detailed in Section XV, Public Resources, of the Initial Study, increased demand for public services, such as police protection services, attributable to the proposed project
would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts."

The Penryn Fire Protection District currently serves about 900 residents. With the addition of 300 apartments in the Penryn Fire District this would essentially double the demand on fire protection and law enforcement services. This increase is significant and cannot be ignored by the DEIR.

336-5 Impact on Archaeological resources is significant for site #17, which has all been identified as having precontact and/or historic archaeological resources.

336-6 Transportation. The EIR determined that the proposed project would result in a significant and unavoidable impact related to generating VMT which exceeds an applicable threshold of significance. Building over 300 units in the remote, rural Penryn area will significantly increase VMT.
The area is not close to grocery stores, medical services, jobs, entertainment or other services.

336-7 Other significant impacts have not been adequately researched in the DEIR for each of the proposed sites.
These include inadequate existing parks, school facilities, hospitals, and infrastructure to accommodate an increased population in rural areas; inadequate wastewater facilities to support the proposed increase in population and density; no availability of adequate public services, including fire protection and sheriff facilities; and deficites in water supply and infrastructure to accommodate the proposed developments.

Patty Neifer
Pneifer@gmail.com
916 934-9050

LETTER 336: PATTY NEIFER

Response to Comment 336-1

Please see Master Response 1 — Non-EIR/Administrative Issues. The commenter appears to be referring to slides from an unidentified presentation. This is not relevant to the analysis within the Draft EIR.

Response to Comment 336-2

Regarding the commenter's general VMT comment, while the proposed project would have a significant VMT impact due to not meeting the applicable threshold of significance, as shown in Table 8-2, future residential development of the rezone sites would reduce the County-wide home-based VMT per resident from 7.7 to 7.6 between Base Year No Project and Base Year Plus Project conditions. According to the TIA, such a reduction may be the result of the future residential development on the rezone sites being located closer to employment and retail locations, thus reducing trip lengths.

Response to Comment 336-3

Please see Master Response 6 – Impacts to Local Schools.

Response to Comment 336-4

Potential impacts associated with the proposed project related to public services such as police and sheriff protection are discussed in Section XV of the Initial Study prepared for the proposed project, and impacts related to fire protection services are discussed in Chapter 10, Fire Protection and Wildfire, of the Draft EIR. As discussed therein, given that no new or physically altered facilities would be required as a result of the proposed project, a less-than-significant impact would occur. In addition, future residential development would be required to pay all applicable fees. Therefore, impacts related to such were adequately addressed.

Additionally, as discussed on page 10-36 of the Draft EIR, personal communication with Placer County Fire Protection Agency ensured that the four fire stations operated by PCFD as well as the two fire stations operated by Truckee FPD would adequately serve the proposed rezone sites within their jurisdictions.

Response to Comment 336-5

Please see Chapter 6, Cultural Resources, and Chapter 9, Tribal Cultural Resources, of the Draft EIR. As discussed therein, record searches did not identify known pre-contact resources on Rezone Site #17. Table 6-1, Precontact, Historic, and Built Environment Resources, included in the Draft EIR shows potential known on-site resources and resources within 0.25-mile of the Rezone Sites. Rezone Site #17 was not one of 23 Rezone Sites identified in the Draft EIR as a precontact and/or historic archaeological rezone site (i.e., a site that has been identified as sensitive for precontact cultural resources). Nonetheless, the Draft EIR included Mitigation Measures 6-2(a),6-2(c), 9-1(a), 9-1(b), and 9-1(c) which would require that a qualified archaeologist conduct a short awareness training session for all construction workers and supervisory personnel prior to the initiation of ground-disturbing activities on any of the 23 rezone sites identified as having precontact and/or historic archaeological resources in the Draft EIR, and that in the event that cultural resources (including Tribal Cultural Resources) are inadvertently discovered during project activities, work in the area be halted within a 100-foot radius of the find

and a qualified archaeologist (pursuant to the Standards at 36 CFR Part 61) be notified immediately to evaluate the resource(s) encountered. Implementation of the mitigation measures included in the Draft EIR would reduce impacts related to archaeological resources to a less-than-significant level.

Response to Comment 336-6

Please see Response to Comment 336-2.

Response to Comment 336-7

Please see Master Response 1 — Non-EIR/Administrative Issues, Master Response 6 – Impacts to Local Schools, Response to Comment 81-3 regarding wastewater infrastructure concerns, and Response to Comment 336-4 regarding fire protection. It should also be noted that any future residential development on rezone sites within the Penryn area would be supplied water by the Placer County Water Agency (PCWA), which, according to Table 5 of the Initial Study (Appendix A of the Draft EIR), has ample water supplies available to serve reasonably foreseeable future development during normal, dry, and multiple dry years through 2040.

Letter 337

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Public Testimony for Wednesdays Hearing on the proposed re-zoning to allow for affordable housing.
Date: Tuesday, February 20, 2024 9:36:31 AM

From: Shawna Purvines <SPurvines@placer.ca.gov>
Sent: Friday, February 16, 2024 12:17 PM
To: Crystal Jacobsen <CJacobse@placer.ca.gov>; Christopher Pahule <cpahule@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: FW: Public Testimony for Wednesdays Hearing on the proposed re-zoning to allow for affordable housing.

From: Virgil Nelson <drcongovir@aol.com>
Sent: Friday, February 16, 2024 12:12 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Jim Holmes <JHolmes@placer.ca.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Shanti Landon <SLandon@placer.ca.gov>; Suzanne Jones <suzanne.pcsupervisor@gmail.com>
Cc: Shawna Purvines <SPurvines@placer.ca.gov>
Subject: Public Testimony for Wednesdays Hearing on the proposed re-zoning to allow for affordable housing.

Dear Placer County Supervisors:

337-1

I was in group six of those scheduled to share testimony in last Wednesdays jam packed hearing regarding rezoning to allow for affordable housing. At 3:30, the public comments were about to begin. With there being **over 50 speakers before me**, I had to leave for another appointment. As you will see, **my comments are mainly directed at the audience. (I hope that you were able to adjourn before midnight!!)**

Below, is what I would have shared.

Your efforts to serve EVERYONE living and working in Placer County are much appreciated.
Peace, Virgil

Testimony: I'm Virgil Nelson, an active member of Placer People of Faith together.
In looked through the 1 1/2 inch stack of written testimony submitted regarding today's hearing, I discovered that the vast majority of the comments were clearly against the proposed zoning changes.

People complain about the homeless on the streets. At THIS MOMENT, over 50 of the homeless in our Placer County shelters have regular income **and are ready to**

move out. There are no affordable rooms or apartments. **If you don't like homeless on the streets or in encampments,** you need to encourage zoning for, and construction of affordable housing.

A college graduate in our church, with a full time job, cannot find an apartment in Placer County. You say that you want your grandchildren to live here and enjoy Placer County. TODAY, YOUR single adult child would NOT be able to find an affordable apartment in Placer County. **If you want your children and grandchildren to stay in Placer County,** you need to encourage zoning for and construction of affordable housing.

Some nurses, aides and in home health care workers commute 2 hours every morning by bus to Roseville. **If you want health services and care for your aging parents,** you need to support zoning for affordable housing.

337-1 cont.

If you want qualified manicurists, beauticians, barbers, carpenters, plumbers, electricians, construction workers, landscapers, gas station attendants, teachers, police officers, grocery store clerks, and maids, you need to support zoning for affordable housing.

As reported earlier today, Placer County is CURRENTLY already over 3,500 units BEHIND in the construction of affordable housing. We at PPoFT hope you will support every effort to zone for, and actually construct affordable housing.

Isaiah 1:17. *"learn to do good; seek justice, correct oppression; bring justice to the fatherless, plead the widow's cause."*

LETTER 337: VIRGIL NELSON

Response to Comment 337-1

Please see Master Response 1 — Non-EIR/Administrative Issues.

Letter 338

From: DOROTHY NUNLEY
To: Placer County Environmental Coordination Services
Subject: Housing Elements sites rezoning
Date: Monday, March 18, 2024 1:44:54 PM

To whom it may concern:

338-1

It has come to my attention that Placer County is soliciting input regarding the rezoning of several parcels in the county to multi-unit parcels and higher density residential zoning. **I wholeheartedly support this change.**

First, I am employed in Roseville, and face a one-hour commute each way, every day. I live in the South part of Sacramento where I was able to purchase an affordable home.

Would I move closer to my employment? Certainly, I would, if there was anything remotely affordable. Having grown up in Placerville, relocating to the foothills is an attractive proposition for me, but I have been priced out. There seems to be no desire on the part of Placer County to provide housing for the employees of their many thriving businesses, leaving those very employees in outlying communities far from their employment.

Some of us would like to be certain that our families could stay close to us, in a safe community, but with no entry-level affordable options our kids have to move away to begin their adult lives

Employees who must commute from outlying communities in other counties does little to foster a sense of community. Employees commuting into Roseville and beyond day after day impacts the air quality and contributes to global warming.

Please adopt the housing sites rezone policy, and let's get some genuinely affordable housing in our community!

Dorothy Nunley

LETTER 338: DOROTHY NUNLEY

Response to Comment 338-1

Please see Master Response 1 — Non-EIR/Administrative Issues.

Letter 339

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30
Date: Tuesday, March 19, 2024 10:55:55 AM
Attachments: Outlook-ngd4xfvy.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:05 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Alex Nguyen <alexnguyen125@yahoo.com>
Sent: Friday, March 1, 2024 2:37 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Dear Members of the Planning Department,

339-1

I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to

reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

339-1 cont.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning.

Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely,
Alex Nguyen

LETTER 339: ALEX NGUYEN

Response to Comment 339-1

Please see Responses to Comments 115-1 to 115-7.

Letter 340

From: Desirée Osterback
To: Placer County Environmental Coordination Services
Subject: Please Remove Site 26 from the Housing Rezone Program List
Date: Monday, March 18, 2024 10:33:57 AM

Dear Placer County Community Development Resource Agency,

As a proud member of the Granite Bay community, I understand the need for low-income housing in this county, and I welcome it in appropriate areas of the town - not next to a school and not at the expense of our wildlife - and in proportion to our small population. Site 26 is unfit for this program, and I implore you to please choose other sites that are more appropriate, that will not harm this community ,and that will allow the new residents under this program to flourish.

Site 26 is immediately next to our junior high school. The Rezone program should not even allow a site that is in such close proximity to a school to be considered. Our children who walk to school, bike to school, who feel safe at school, will be put in danger by the excess traffic and the unnecessary amount of people around their school environment. Our children deserve to go school without the risk of being hurt or being scared. This is absolutely unacceptable. This is poor planning. There are other, fitting, more appropriate sites available in Granite Bay; please pick other sites.

Additionally, Site 26 houses protected species, a creek, wildflowers and plants that drive pollination by the bees and birds. The assassination of the environment at the expense of this project is unjustified, as there are other sites available. Please pick other sites.

340-1

Site 26 also allows the County to place a completely disproportionate amount of the County's overall low-income housing units at this one site. Out of four districts, and many towns and potential sites, Site 26 will place almost 22% of the County's low-income housing at this single site. This site cannot accommodate that number of units or residents; the infrastructure is totally lacking, and there are inadequate resources.

We are a town of 22,000 residents, a town that is already facing traffic constraints from the daily commute through the Auburn Folsom and Douglas intersection, which is right next to the intersection at Site 26. The residents here already struggle with traffic safety and the sheer number of cars on the roads, making it a headache to navigate through the area where Site 26 sits.

In this small town, where would 22% of the county's new residents work in Granite Bay? There are no jobs here.
Where would 22% of the county's new residents shop in Granite Bay? There is one grocery store within walking distance from Site 26. This grocery store is not geared toward-low income shoppers, so how would 22% of the county's new residents get to another grocery store? How would they commute?
There is no public transportation in Granite Bay near Site 26. Would the residents all walk up and down Auburn Folsom and Douglas? Those streets have killed motorists and pedestrians, now we are sending new residents out to walk them? At the risk of their safety and the motorists' safety? This is not acceptable. The new residents of Placer County who will benefit from this program deserve better than this.

Where would over 600 residents send their children to school in Granite bay? The schools are at capacity, and are doing their best to accommodate the children already enrolled. With 22% of the county's new population in this one, tiny town, how would the schools be able to accommodate these children, while still teaching ours? Shall our childrens' education be expected to suffer at the expense of the county's poor planning?

There are other sites that are more appropriate and more accommodating; please pick those. Spread out the number of new residents across the county, across Granite Bay and through different towns. Granite Bay would be significantly harmed and forever changed by this disproportionate number of housing units and new residents at Site 26. And the new residents would be stifled and unable to flourish at Site 26.

340-1 cont.

The county has a duty to protect its residents who are here now, and those who will be moving here under the program. We are imploring the Supervisors to hear our voices and make the right choice for the residents of Granite Bay and its new residents. The county can fulfill its obligation to provide low-income housing by choosing other sites that are more appropriate.

Please remove Site 26 from the list and choose other, better options in Granite Bay. You have a chance to do what you are elected to do - to represent us, the community, and our voices. We are very clearly telling you that Site 26 is unfit for the program. Please do better for us. Do better for our children. And do better for the new residents of Placer County - we all deserve better planning that Site 26 provides.

Thank you,

Desiree Osterback

LETTER 340: DESIREE OSTERBACK

Response to Comment 340-1

Please see Master Response 1 — Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, and Master Response 6 – Impacts to Local Schools. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

It is also noted that the County has secured grant funding to install a new enhanced crosswalk for pedestrians crossing Fuller Drive near Cavitt Junior High School. The grant funding is unrelated to the proposed project and will be installed whether or not site 26 is rezoned as part of the proposed project. That new crosswalk could alleviate the concerns raised by the commenter.

Please see Response to Comment 52-2 regarding biological resource concerns for Site 26.

Letter 341

From: Desirée Osterback
To: Bonnie Gore; Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson
Cc: Kally Kedinger-Cecil; Frank Udvarhely; Placer County Environmental Coordination Services; Planning Commission; Board Clerk
Subject: Please Reconsider Site 26 for Placer County High-Density Housing Project
Date: Wednesday, March 13, 2024 10:56:38 AM

Dear Supervisors,

As a long-time Granite Bay resident, I never thought I would be writing an email begging you to save our rural, unincorporated town from the countless repercussions that will come with putting high-density housing on Site 26 - 8989 Auburn Folsom Road.

I understand the need for affordable housing in this wonderful county of Placer. However, Site 26 is unfit to meet this need.

1. Environmentally Unfit. Site 26 is not environmentally fit for such a project. Please conduct a proper EIR. That land is home to wildlife and animals who depend on it for survival. There is a creek on the property, and the animals depend on the creek to live. Find another site that is zoned for a project of this magnitude, and that will not result in the loss of our beloved wildlife and their habitats.

2. Impact on our Children. Site 26 is right next to our junior high school. The ways in which the additionion of 600 residents next door to our junior high school will impact our children are countless. Many of the Granite Bay residents came here to send our kids to school in a quiet, safe community, free from the burdens of city life. Putting this project on Site 26 will change the entire atmosphere at the junior high, from safety concerns to traffic, to the sheer number of people around the campus.

341-1

3. Traffic. Site 26 sits at a prominent intersection. The impact of this project at this site on our traffic will be long-term, extremely expensive and make for a horrific change in the way we get around. It is already congested at the Auburn Folsom and Douglas intersection at rush hour. Both of those streets get backed up, with multiple traffic concerns daily. Our little town is already strapped with traffic coming to and from the surrounding areas. With 600 additional residents at one of the main corners of our town, our easy days will turn into headaches. Accidents will increase, pedestrians will face bigger safety concerns, the children who walk to Cavitt Junior High will be more at risk for accidents, the need for law enforcement will increase, increasing the financial need to fund law enforcement.

4. Rural Community without Resources. **Granite Bay is not a city!** We do not have the support of a city, the support of which is required for a project of this magnitude, especially at Site 26. We cannot be asked to bear the burden of such a project without any foundation for the problems and repercussions that will undoubtedly come if this moves forward at Site 26, an extremely prominent location. We are not incorporated, we do not have our own police department, we do not have our own fire department, we do not have the resources to implement this project at this location.

With just over 20,000 residents, Granite Bay is coveted for its small-town feel, its rural atmosphere, its easy, slow lifestyle. **We, the collective residents, love Granite Bay and we moved here because there are no high-rises, no dense living, no congested intersections, low crime. This is a place the residents came to escape the city life.** The location of Site 26

is at the forefront of this town, and this project, if built, will change the entire atmosphere of our daily lives.

If Site 26 is chosen for this project, it will severely impact our way of life here. The wildlife we all love so much suffer greatly, as their home is ripped away from them. Our children will face new safety and learning concerns. The traffic will be a nightmare. And we will be looking at once again how to escape that way of life, that way of life that was forced upon the rural life we chose. We will end up selling our houses, moving, taking our kids out of schools in the district. **We will no longer love this town; we will despise it and mourn the loss of our dreams to grow old here.**

People have been given a right to affordable housing in this county, as mandated by the state. But the people of Granite Bay - the people who live here, have made a life here, pay taxes here, who love it here - we have a right to protect and keep our way of life here, and to protect the wildlife of Site 26, which is not fit for this project.

341-1 cont.

We are asking you to help us protect us and Site 26. We, as a collective community, are begging you to reconsider Site 26 for the high-density building.

I, as a mother of two young children and resident of this amazing community, am begging you to please reconsider Site 26 and choose another site that is better apt to handle the consequences of such a building.

Please. As you think over this decision, please understand the severe impact of this decision on the lives of Granite Bay residents, lives that we worked so hard to build here. **We have entrusted you to be our voices, we have given you the support of our votes - now we are asking that you give us your support and protection.**
Please reconsider Site 26.

Thank you for your time.

Desiree Osterback
916-420-7470

LETTER 341: DESIREE OSTERBACK

Response to Comment 341-1

Please see Response to Comment 340-1.

Letter 342

From: Blanca
To: Planning Commission; Placer County Environmental Coordination Services
Subject: Remove Project 26 a 8989 Auburn Folsom Rd.
Date: Thursday, March 7, 2024 10:14:11 PM

342-1

Please remove project 26 -8989 Auburn Folsom Rd. Granite Bay.

I stand with all the voices saying this is a horrible place to add high density housing. My own kids can't even cross the street without fear of a car driving 75mph.

Even in my car I struggle with the speed and traffic and congestion!

You are here for the people, do not take shortcuts! Have character and honesty please!

Blanca Papas
Btpapas@gmail.com
650-291-7819

LETTER 342: BLANCA PAPAS

Response to Comment 342-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Letter 343

From: Donna Parada
To: Placer County Environmental Coordination Services
Subject: Comments to Housing Elements Sites Rezone PLN22-00476
Date: Sunday, March 17, 2024 3:07:51 PM
Attachments: PlacerCountyRezone.docx

Please see attached my comments in response to the Housing Element Sites Rezone PLN22-00476, Placer County. My comments are directed primarily toward Candidates #39, 40, and 52.

I am a homeowner with my brother (the resident) in Train Village

Thank you for your consideration.

Respectfully,

Donna Parada
5550 Chokecherry Ct
Ogden UT. 84403

March 17, 2024

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

With Respect,

I am writing in response to the Housing Element Sites Rezone (PLN22-00476), State Clearinghouse No. 2023100581. I respectfully request extensive thought and reconsideration be given to candidates #39, 40, and 52 for the following reasons;

343-1 1. This area sits between Train Village residential area and Foothills Bowl which empty onto the Bowman Frontage Road. Currently there is only one access road into/out of Train Village for the occupants of the 34 homes and small apartment complex, utilizing Dolores Drive. Bowman Road is already a high traffic area with retail, restaurants, motels, and gas stations. It has become increasingly more difficult for Train Village residents to get in and out of their area. There is only a stop sign at the intersection. Bowman Road is also the East exit point for Luther Road, also a high traffic area. Any high density complex built in these zones would further congest this - already impacted - high traffic area.

343-2 2. These 3 candidates, as well as 8 additional candidates, all fall within the Ackerman School District. Bowman Charter School is the only school in this District currently serving 562 students, both in district and out of district (via lottery). Any high density housing complex would overwhelm this school with in district students, perhaps beyond its capacity.

343-3 3. Ackerman School District is a very small district with limited funding. There is no bus service to Bowman Charter School. Consequently, most children are driven to school and picked up after in private vehicles. A high density housing complex occupied by low- and very low income residents will very likely increase the number of students walking to school. These students would be required to walk to school through a transient area (Bowman Road) with high traffic moving in all directions and no crosswalks with traffic signals. There is also no sidewalk for children to walk on in many areas along the route to school.

343-4 4. When I-80 is closed for hazardous weather conditions many semis park along Dolores Drive and behind the Foothills Bowl. This creates an additional concern for the safety of the children who will live and play in this area of high density housing.

343-5 5. There are no fire hydrants located in Train Village or any area close. The open field adjacent to Terry Lane has always been a fire risk as the summer grasses are never controlled in candidate #39. Please do not subject occupants of a high density housing project to this area of unacceptable fire risk.

343-6 I would recommend a low density residential area of single homes much like the area along Auburn Ravine Road between Mikkelsen Drive and Epperle Lane where a farm supply store once was. This kind of low density housing would be much more easily absorbed into the existing amenities.

Thank you for your time and consideration.

Respectfully,

Donna Parada
5550 Chokecherry Court
Ogden, UT 84403
(801)791-9602

Homeowner of;
149 Dolores Drive
Auburn, CA. 95603

LETTER 343: DONNA PARADA

Response to Comment 343-1
This comment states that the proposed project impact existing access points in increasing congestion near residential neighborhoods near sites 39, 40, and 52 in the Bowman area. Refer to Master Response 1: Non-EIR/Administrative Issues.

Response to Comment 343-2
See Master Response 6 – Impacts to Local Schools.

Response to Comment 343-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 343-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 343-5
See Chapter 10: Fire Protection and Wildfire.

Response to Comment 343-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 344

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Placer County Rezone Project - Sites 71 & 72 - Opposition
Date: Thursday, March 7, 2024 4:26:31 PM

From: Wendy Parks <noteworthywendy@hotmail.com>
Sent: Thursday, March 7, 2024 3:12 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Placer County Rezone Project - Sites 71 & 72 - Opposition

Hello Ms. Kedinger,

I am writing in to express my strong opposition to the rezoning of sites 71 & 72 in the city of Auburn.

The following are my concerns:
Increased traffic and safety issues on an already tight road with a blind curve
Lack of available services for large addition to population (from my experience some local doctors and dentist have 5-9 month waiting periods)
Lack of public transportation for added population
Lack of jobs for added population
Encroachment of local wildlife habitat
Potentially lower property value of neighboring homes

344-1

Please commentate my opposition in your meeting and let me know if there is any other way I can comminate my opposition.

Thank you,
Wendy Parks
742 Dorothy Way
Auburn, CA 95603
760-449-1273

LETTER 344: WENDY PARKS

Response to Comment 344-1

Please see Master Response 1 — Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Responses to Comments 2-12, 2-14, and 174-2.

Letter 345

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing rezone Placer county
Date: Tuesday, March 5, 2024 8:55:52 AM

From: Pixie Patton <pixiepatton@gmail.com>
Sent: Monday, March 4, 2024 11:05 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Housing rezone Placer county

345-1 To whom it concerns,
I live behind the proposed sites for rezoning for low income housing at parcels 38,39,40 and 52. I understand there needs to be more housing for low income families but to put those at these sites will impact our road and the value of our property. We already have apartments here. Please don't use these properties. .

Thank you,
Pixie Patton

LETTER 345: PIXIE PATTON

Response to Comment 345-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 346

Eric and Paula Peach
215 Del Monte Way
Auburn, CA 95603
530-210-5717
Email: eriverpeach@gmail.com

March 10, 2024

Placer County Planning Department
3091 County Center Drive
Auburn, CA 95603
Mr. Chris Pahule Planning Director
cpahule@placer.ca.gov
Ms. Kally Kedinger-Cecil Senior Planner
kkedinge@placer.ca.gov

Dear Placer County Planning Department,

We are writing you regarding the potential high-density RM30 rezone of the following sites in the City of Auburn.

Site #71 – APN 054-290-064-000 - 85 LINCOLN WY AUBURN 95603 – 2.9 acres - 126,324 sq. ft.

Site #72 – APN 054-290-065-000 - 85 LINCOLN WY AUBURN 95603 – 4.5 acres - 196,020 sq. ft.

346-1 We are opposed to the high density RM30 rezoning for these properties just outside the Auburn City limits that Placer County is considering. We feel that this is a reckless, desperate attempt by Placer County to accommodate State mandated housing that should have been resolved within all the new subdivisions that the County approved. This area, in keeping with the rural character, of Auburn is currently developed as single-family residences with occasional small apartment complexes or duplex units that compliment Auburn's rural town character. We are not opposed to infill development but a density of approximately 200+ units in up to 3 story buildings on a meager seven acres is simply not compatible in the upper Lincoln Way neighborhood. A development of this proportion puts serious pressure on water and sewer services. It is likely that a new sewer pump station will be needed for the development.

346-2 The traffic whose only entrance and exit is on a blind curve with limited sight lines on Lincoln Way is totally irresponsible. This curve has been the scene of automobile accidents -the most recent when a father and his son who were riding a motorcycle were hit head on by a motorist in their lane almost killing the father and seriously injuring his son.

346-3 Coincidently, the Lincoln Way turnout near the proposed development has a spectacular view of the sunrise and full moon rise over the Sierra Nevada Mountains. Often residents and motorists stop at the turnout area to enjoy and photograph the sun and moon. evening full moon rise over the or the sunrise over the Sierra Nevada Mountains. Presumably the view that connects our foothill community to the mountains will be hidden behind the new development. We live in Auburn to enjoy the amenities of a rural foothill community that borders the natural American River environment.

346-4

The American River will suffer from pollution conveyed by a tributary of Canyon Creek on the property that flows directly into the popular Calcutta Falls and a recreational beach site on the American River. Neighborhood residents report that the property owners and the County have a cavalier attitude towards grading and erosion control at sites 71 and 72. No erosion control barriers to protect Canyon Creek were used when the property owners in their zealous effort to strip the property of vegetation and grade the property for development.

346-5

While we recognize the need for affordable housing and we are not against infill development in our city -this is extreme. If we wanted dense apartment complexes we would live elsewhere. How would you like to host such a massive dense development in your neighborhood?

We urge the County to consider other sites for RM30 zoning that do not have such a negative impact on the surrounding Auburn community neighborhoods.

Respectfully Yours,

Eric & Paula Peach

Cc.
Placer County Board of Supervisors
Auburn City Council

LETTER 346: ERIC AND PAULA PEACH

Response to Comment 346-1
Please see Response to Comment 81-3.

Response to Comment 346-2
The proposed project does not include any site-specific development plans. While the proposed sites are in the unincorporated County, the roadway itself is owned, operated, and maintained by the City of Auburn. If development is proposed on sites 71 and/or 72, the proposed project would be reviewed in accordance with the City's roadway and encroachment standards. The project applicant would be required to provide engineering designs to meet applicable requirements, based on the size of the proposed project. The project applicant would be required to obtain an encroachment permit from the City of Auburn in order to construct an access point on Lincoln Way.

Response to Comment 346-3
Potential impacts regarding Aesthetics are addressed in Section I of the Initial Study, prepared for the proposed project (attached as Appendix A of the Draft EIR). As discussed therein, future development of the rezone sites would be subject to County review and compliance with the applicable development standards for the RM30 zoning district included in Chapter 17 of the Placer County Code and would be subject to the requirements established in the Multifamily and Mixed Use Design Manual (June 2021) for lot area, site width, setbacks, floor area ratio, height limit, and other applicable standards. Furthermore, future residential development would be required to comply with applicable guidelines and regulations related to visual quality, including the Placer County Design Guidelines, the specific design guidelines contained in the relevant Community Plan for each site, and Article 17.54 of the Placer County Code.

Response to Comment 346-4
As discussed in Section X-4 of the Initial Study prepared for the proposed project, future development that would result in a land disturbance of one acre or more would be required by the State to comply with the most current Construction General Permit requirements. Pursuant to the requirements, a SWPPP would be required for the development of each individual rezone site greater than one acre, which would include the site map, drainage patterns and stormwater collection and discharge points, BMPs, and a monitoring and reporting framework for implementation of BMPs, as necessary. In addition, a Notice of Intent (NOI) would be filed with the RWQCB. In accordance with the Construction General Permit, each site would also be inspected during construction before and after storm events and every 24 hours during extended storm events in order to identify maintenance requirements for the implemented BMPs and to determine the effectiveness of the implemented BMPs. As a "living document", the site-specific SWPPP that would be prepared for each rezone site exceeding one-acre would be modified as construction activities progress. A Qualified SWPPP Practitioner (QSP) would ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The QSP for the project would amend the SWPPP and revise project BMPs, as determined necessary through field inspections, to protect against substantial erosion or siltation on- or off-site. Both Rezone Sites #71 and #72 are over one acre, and, therefore, would be required to adhere to the aforementioned requirements.

Response to Comment 346-5

Please see Master Response 1 — Non-EIR/Administrative Issues.

Letter 347

From: Karen Pearson
To: Placer County Environmental Coordination Services; Planning Commission
Subject: Request full EIR for "Project 26", property 26 at 8989 Auburn Folsom Road
Date: Friday, March 8, 2024 5:28:35 PM

All,

347-1

Please perform a proper EIR for the subject property, Project 26 at 8989 Auburn Folsom Road in Granite Bay. Please do not "expedite" or "streamline" the EIR review process. Expedited reviews will result in errors and omissions on the development negatively impacting all involved parties.

I support a thorough EIR and a review period by Placer County residents for all of these proposed developments which can vet out problems that will impact all residents in Placer County.

Regards,

Karen Pearson
2521 Long Valley Dr, Newcastle, CA 95658

LETTER 347: KAREN PEARSON

Response to Comment 347-1

Please see Master Response 5 — Programmatic EIR vs. Site-Specific EIR.

Letter 348

From: Valarie Peluso
To: Placer County Environmental Coordination Services
Subject: Housing Element Sites Rezone (PLN22-00476) State Clearing House No. 2023100581
Date: Tuesday, March 19, 2024 12:18:16 AM
Attachments: image001.png
image002.png

To All This May Concern,

My name is Valarie Peluso. I am the owner of the Penryn 76 Food Mart and Penryn Grill. It was brought to my attention last week by one of our neighbors and patrons about this project. Since it was not posted until last week, I had no idea what was happening directly next to my store. This is my only business. I have put a lot into this community I believe in this community. We are like family here. However, I am terrified for not only my business, but for this whole small town.

We have been fortunate to be able to keep our community clean and for the most part safe. This project will do the opposite of that. My store is a safe place for the kids from Del Oro to come to. We do not have Panhandlers hanging around my store. We do not have drug use or dealing around our store. I am afraid this project would invite all of this to happen. We would be a target for crime due to our location. We have been able to keep all of this at bay due to the community all of us have built.

I do not see how our very small Fire Department could fight 3 story fires. We do not have enough Paramedics to help with a lot of the emergencies that could happen. We would need to build a State-of-the-Art Fire Department to serve such a large community.

348-1

We do not have enough schools that would serve a large community as this. We would need to build a new Elementary, Jr. and Sr. High Schools.

We do not have enough Medical or Dental Providers that could handle all of the people that would live there. We would need to build more Medical and Dental Facilities that could service Low-Income families.

We do not have any Grocery Stores in Penryn you would need to find someone willing to build a Grocery Store with a Pharmacy to serve this large, proposed community. Currently, my store is all we have. We are a high-end Destination Station that services the community we now have. I will not accept EBT at my store. They will need to find somewhere else to go to use their EBT. I do not have the time to or money to front the government for this resource.

I am building a small restaurant for our Penryn Community and families. It is a safe place where families can come have a nice meal and feel safe. I am putting in over a million dollars to build this place. Had I known about this project I would not have started my project.

We need to build all of this infrastructure to support this housing project before approving multi-family housing.

Sincerely,

Valarie Peluso| Penryn 76 Food Mart
3142 Boyington Rd. Penryn CA 95663 ☎ 916-214-7469

LETTER 348: VALARIE PELUSO

Response to Comment 348-1

Please see Master Response 1 — Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 6 – Impacts to Local Schools.

Regarding the commenter's fire-related comments, the Draft EIR acknowledges that the multi-story structures that could potentially be built on rezone sites could require a ladder truck in the event of an emergency (page 10-38 of the Draft EIR). However, as noted on page 10-38 of the Draft EIR in regard to the Penryn FPD and Placer Hills FPD,

> While a new ladder truck within the FPDs' service area would be needed to meet the response time targets (NFPA Standard 1710), this would not constitute a CEQA impact unless a new or expanded fire station facility would be needed to house the ladder truck, as such new construction or alteration could result in physical impacts to the environment. According to Chief D'Ambrogi, the Newcastle FPD station, which is a new station completed last year…, was designed to accommodate a ladder truck and can do so efficiently.[1] If this were to be done, the response times would be in the range of 5-7 minutes, using Taylor Road or I-80 to the Penryn/Loomis areas.[2] Thus, the reasonably foreseeable residential development that could potentially result from the proposed project within the Penryn FPD and Placer Hills FPD jurisdictions would not require a new fire station or alteration of an existing fire station to house a new ladder truck, should the Newcastle FPD obtain sufficient funding to purchase said truck.
>
> As previously stated, lack of funding to operate existing fire protection facilities, or purchase new equipment, is not a CEQA concern.

Nevertheless, the commenter's concerns have been forwarded to the decision-makers for their consideration.

[1] D'Ambrogi, Mark, Fire Marshall, Placer Hills-Newcastle-Penryn Fire Protection Districts. Personal Communication [email] with Kally Kedinger-Cecil, Senior Planner, Placer County Planning Services Division. December 14, 2023.
[2] *Ibid*.

Letter 349

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Dry Creek rezoning
Date: Tuesday, March 19, 2024 10:57:55 AM
Attachments: Outlook-itzpinik.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:09 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Dry Creek rezoning

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Dean Perkins <swamiperk@gmail.com>
Sent: Wednesday, March 13, 2024 12:06 AM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Dry Creek rezoning

Dear Commissioner Dahlgren:

349-1

Oh, how we were surprised when we recently found out that our county, the one which looks out for its constituents, had pushed a backdoor approach of trying to satisfy a state rule. The laws are supposed to protect said people, not put them in a position of fear and frustration for having the feeling of "there's nowhere to turn." We are talking about Dry Creek sites 7,8,9,and 10.

Please understand our position regarding the rezoning of land outside the city limits of Roseville. This is the area where a one-lane bridge was turned into a 2-

lane bridge just a few years ago. There has also been a school added on Cook-Riolo Rd. Passing down this road is very difficult when the school begins and ends.

Now you wish to add over one hundred units to this lovely country road. Right across the road from the school! In addition to even more traffic, the country setting will be infringed upon. Most inhabitants of Dry Creek hold space between our homes as an important draw.

I'm guessing that you don't have to do this to our pristine area, that you can take the time to find a less settled area. Please don't place such a burden on our roads and home areas.

349-1 cont.

Dean an Kathy Perkins

9200 Pinehurst Dr.

Roseville, CA 95747

LETTER 349: DEAN AND KATHY PERKINS

Response to Comment 349-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 350

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezone: Dry Creek sites 7, 8, 9, 10
Date: Tuesday, March 19, 2024 10:57:30 AM
Attachments: Outlook-tycg0mf0.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:08 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Rezone: Dry Creek sites 7, 8, 9, 10

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Stephanie Perlberg <stephanie.perlberg@gmail.com>
Sent: Thursday, March 7, 2024 12:47 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Rezone: Dry Creek sites 7, 8, 9, 10

Dear Planning Commision Representative Robyn Dahlgren:

350-1

I am writing to express my deep concerns regarding the proposed rezoning of multiple properties in our cherished Dry Creek rural community for the development of low-income apartment housing. As a resident deeply invested in the well-being and character of our neighborhood, I believe it is essential to voice our collective opposition to this initiative.

While I recognize the importance of affordable housing and the need to support vulnerable populations, I firmly believe that rezoning these properties for low-income apartment housing

350-1 cont. ↑ is not the appropriate solution for our community. Here are several reasons why:

350-2
1. **Impact on Community Character**: The introduction of low-income apartment housing will fundamentally alter the character and ambiance of our rural community. Dry Creek is known for its tranquil environment and close-knit community spirit. Introducing large-scale apartment complexes could disrupt this dynamic and diminish the unique charm that we all cherish.

350-3
2. **Strain on Infrastructure**: Our community's infrastructure, including roads, utilities, and public services, may not be adequately equipped to handle the increased population density that would result from the construction of low-income apartment housing. This could lead to congestion, strain on resources, and diminished quality of life for current residents.

350-4
3. **Concerns for Safety and Security**: Introducing a large number of apartments could raise concerns about safety and security within our community. Increased population density often correlates with higher crime rates, which could jeopardize the well-being of our residents and undermine the sense of security we currently enjoy.

350-5
4. **Potential Decline in Property Values**: The presence of low-income apartment housing in our neighborhood could have negative implications for property values. Many residents have invested substantial time and resources into their homes, and a decline in property values could undermine this investment and erode our financial security.

In light of these concerns, I urge you to reconsider the proposed rezoning of multiple properties for low-income apartment housing in Dry Creek. Instead, I encourage exploring alternative solutions that prioritize affordable housing without compromising the integrity and character of our community.

350-6
As residents, it is essential that our voices are heard in this matter. I implore you to take our concerns into account and advocate for the preservation of our beloved Dry Creek rural community.

Thank you for your attention to this matter.

Sincerely,

Chris and Stephanie Perlberg

3252 Dolcetto Street

Roseville, CA 95747

(916) 666-1464

--
Have a great day!

Stephanie Perlberg

LETTER 350: STEPHANIE PERLBERG

Response to Comment 350-1
Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 2 — Social and Economic Impacts.

Response to Comment 350-2
Please see Master Response 2 — Social and Economic Impacts.

Response to Comment 350-3
Please see Master Response 1 — Non-EIR/Administrative Issues and Response to Comment 115-3.

Response to Comment 350-4
Please see Master Response 1 — Non-EIR/Administrative Issues

Response to Comment 350-5
Please see Master Response 2 — Social and Economic Impacts.

Response to Comment 350-6
Please see Master Response 1 — Non-EIR/Administrative Issues.

Letter 351

From: Stephanie Perlberg
To: Placer County Environmental Coordination Services
Subject: Rezone: Dry Creek sites 7, 8, 9, 10
Date: Monday, March 18, 2024 3:00:53 PM

I am writing to express my deep concerns regarding the proposed rezoning of multiple properties in our cherished Dry Creek rural community for the development of low-income apartment housing. As a resident deeply invested in the well-being and character of our neighborhood, I believe it is essential to voice our collective opposition to this initiative.

While I recognize the importance of affordable housing and the need to support vulnerable populations, I firmly believe that rezoning these properties for low-income apartment housing is not the appropriate solution for our community. Here are several reasons why:

351-1

Impact on Community Character: The introduction of low-income apartment housing will fundamentally alter the character and ambiance of our rural community. Dry Creek is known for its tranquil environment and close-knit community spirit. Introducing large-scale apartment complexes could disrupt this dynamic and diminish the unique charm that we all cherish.
Strain on Infrastructure: Our community's infrastructure, including roads, utilities, and public services, may not be adequately equipped to handle the increased population density that would result from the construction of low-income apartment housing. This could lead to congestion, strain on resources, and diminished quality of life for current residents.
Concerns for Safety and Security: Introducing a large number of apartments could raise concerns about safety and security within our community. Increased population density often correlates with higher crime rates, which could jeopardize the well-being of our residents and undermine the sense of security we currently enjoy.
Potential Decline in Property Values: The presence of low-income apartment housing in our neighborhood could have negative implications for property values. Many residents have invested substantial time and resources into their homes, and a decline in property values could undermine this investment and erode our financial security.

In light of these concerns, I urge you to reconsider the proposed rezoning of multiple properties for low-income apartment housing in Dry Creek. Instead, I encourage exploring alternative solutions that prioritize affordable housing without compromising the integrity and character of our community.

As residents, it is essential that our voices are heard in this matter. I implore you to take our concerns into account and advocate for the preservation of our beloved Dry Creek rural community.

Thank you for your attention to this matter.

Sincerely,

Chris and Stephanie Perlberg

3252 Dolcetto Street

Roseville, CA 95747

(916) 666-1464

-

LETTER 351: CHRIS AND STEPHANIE PERLBERG

Response to Comment 351-1

Please see Responses to Comment Letter 350.

Letter 352

From: Bob Peterson
To: Placer County Environmental Coordination Services
Subject: DEIR - Hpusing Rezone Draft Proposal
Date: Saturday, March 16, 2024 10:15:09 AM

To PCCDRA and County Board of Supervisors -

While many, if not most Placer County residents favor more affordable housing choices, there are far too many negative impacts on the local communities quality of life in several of the rezoning segments.

I will confine my objections to figures 3-4 Granite Bay, 3-8 Auburn/Bowman and 3-9 North Auburn. Proposed development in all three of these areas will further congest already high traffic roads and two school zones (3-4 and 3-8). At the last public hearing conducted by the PC Board of Supervisors, it was made clear that there is virtually no way to ensure that actual "lower cost" housing will be built. The developers have far too much discretion.

352-1

Regarding low-cost housing impacts on the immediate community, the historical experience is not favorable. The properties are too often not maintained and crime in those areas tends to increase.

I am strongly against approving the plans for 3-4, 3-8 and 3-9. I attended the last PCBOS meeting (and contracted COVID in the over-crowded meeting room with a 5 hour long duration) and will certainly make my voice heard at the upcoming meetings scheduled on April 25th and May 7th.

Thank you for taking my input into strong consideration.

Respectfully,

Bob Peterson
12911 Erin Drive
Auburn, CA 95603
530-320-1676

Virus-free.www.avast.com

LETTER 352: BOB PETERSON

Response to Comment 352-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 353

From: Jeff Pettit
To: Placer County Environmental Coordination Services
Cc: Jeffrey Pettit
Subject: Comment on DEIR for Housing Element Rezone Sites Project
Date: Monday, March 18, 2024 4:51:10 PM

Hello,
Thank you for the opportunity to comment on the subject item.

353-1

1. I would ask the parties to look at Chapter 12, pg. 14 Alternatives Analysis. The Table 12-2 seems to reflect closely the latest list of rezone properties listed in the Housing Element Amendment March 2024. It appears to be the Environmentally Superior Alternative, so if we have to do it, let's go with that!

2. Even though the following properties are NOT on either Table 12-2 in the DEIR, nor on the latest list of rezone properties listed in the Housing Element Amendment March 2024, I would like to point out the the following properties *were* on previous lists, but have been called out in the DEIR as harboring moderate to high concentrations of NOA (Naturally Occurring Asbestos), and also would ***severely*** impact traffic on Edgewood Rd. and Hwy 49 and should remain OFF of any future lists.

#60 1185 Edgewood Rd.
#64 Edgewood Rd./Biltz Ln.
#64 11764 Edgewood Rd.
#73 920 Blitz Ln.

Thank you for your consideration.

Sincerely,

Jeff Pettit
710 Blitz Ln.
Auburn, CA 95603

LETTER 353: JEFF PETTIT

Response to Comment 353-1

The comment does not address the adequacy of the EIR. In addition, since preparation of the EIR, the rezone list has been revised. The original site list for the rezoning program contained 72 properties. The final list of sites to be rezoned is expected to ultimately contain fewer properties and acreage as the list is refined; however, the project's EIR analyzes all 72 sites to ensure adequate environmental review regardless of which properties ultimately comprise the refined list. On February 13, 2024 the Board of Supervisors directed staff to continue consideration of 19 sites for inclusion of the rezone program. Table 12-2 in Chapter 12 of the EIR is the refined list which has been approved by the Board of Supervisors. Properties #60, #64, and #73 are not included on the refined list. Additionally, in regard to NOA, see Response to Comment 163-12.

As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 354

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: High-density RM30 Rezone
Date: Tuesday, March 12, 2024 3:38:39 PM

From: Dennis Peyton <dpeyton@caldep.com>
Sent: Tuesday, March 12, 2024 2:28 PM
To: Christopher Pahule <cpahule@placer.ca.gov>
Cc: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: High-density RM30 Rezone

Dennis & Barbara Peyton
120 Haswell Court
Auburn, CA 95603
530-210-5717
Email: dennispeyton@comcast.net

March 12, 2024
Placer County Planning Department
3091 County Center Drive
Auburn, CA 95603
Mr. Chris Pahule Planning Director
cpahule@placer.ca.gov
Ms. Kally Kedinger-Cecil Senior Planner
kkedinge@placer.ca.gov

Dear Placer County Planning Department,

We are writing you regarding the potential high-density RM30 rezone of the following sites in the City of Auburn.

Site #71 – APN 054-290-064-000 - 85 LINCOLN WY AUBURN 95603 – 2.9 acres - 126,324 sq. ft.

Site #72 – APN 054-290-065-000 - 85 LINCOLN WY AUBURN 95603 – 4.5 acres - 196,020 sq. ft.

354-1

We are opposed to the high density RM30 rezoning for these properties just outside the Auburn City limits that Placer County is considering. We feel that this is a reckless, desperate attempt by Placer County to accommodate State mandated housing that should have been resolved within all the new subdivisions that the County approved. This area, in keeping with the rural character, of Auburn is currently developed as single-family residences with occasional small apartment complexes or duplex units that compliment Auburn's rural town character. We are not opposed to infill development but a density of approximately 200+ units in up to 3 story buildings on a meager seven acres is simply not compatible in the upper Lincoln Way neighborhood. A development of this proportion puts serious pressure on water and sewer services. It is likely that a new sewer pump station will be needed for the development.

The traffic whose only entrance and exit is on a blind curve with limited sight lines on Lincoln Way is totally irresponsible. This curve has been the scene of automobile accidents -the most recent when a father and his son who were riding a motorcycle were hit head on by a motorist in their lane almost killing the father and seriously injuring his son.

354-1 cont.

Coincidently, the Lincoln Way turnout near the proposed development has a spectacular view of the sunrise and full moon rise over the Sierra Nevada Mountains. Often residents and motorists stop at the turnout area to enjoy and photograph the sun and moon. evening full moon rise over the or the sunrise over the Sierra Nevada Mountains. Presumably the view that connects our foothill community to the mountains will be hidden behind the new development. We live in Auburn to enjoy the amenities of a rural foothill community that borders the natural American River environment.

The American River will suffer from pollution conveyed by a tributary of Canyon Creek on the property that flows directly into the popular Calcutta Falls and a recreational beach site on the American River. Neighborhood residents report that the property owners and the County have a cavalier attitude towards grading and erosion control at sites 71 and 72. No erosion control barriers to protect Canyon Creek were used when the property owners in their zealous effort to strip the property of vegetation and grade the property for development.

While we recognize the need for affordable housing, and we are not against infill development in our city -this is extreme. If we wanted dense apartment complexes we would live elsewhere. How would you like to host such a massive dense development in your neighborhood?

We urge the County to consider other sites for RM30 zoning that do not have such a negative impact on the surrounding Auburn community neighborhoods.

Respectfully Yours,

We authored this document.

Dennis & Barbara Peyton
Cc.
Placer County Board of Supervisors
Auburn City Council

LETTER 354: DENNIS AND BARBARA PEYTON

Response to Comment 354-1

Please refer to Responses to Comments 346-1 through 346-5.

Letter 355

From: Karen Phillips
To: Planning Commission; Placer County Environmental Coordination Services
Subject: Request EIR for Project 26
Date: Thursday, March 7, 2024 11:15:22 AM

355-1

I request an EIR for "Project 26" located at 8989 Auburn Folsom Rd. Granite Bay.

This property is habitat to many animals and Linda Creek runs through it.

Karen A Phillips
9060 Auburn Folsom Rd, Spc 57
Granite Bay CA 95746

LETTER 355: KAREN PHILIPS

Response to Comment 355-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 5 — Programmatic EIR vs. Site-Specific EIR. Please also see Response to Comment 52-2 regarding Linda Creek concerns.

Letter 356

From: Rebecca Peirce
To: Placer County Environmental Coordination Services
Subject: Oppose Dry Creek Housing Element Rezone
Date: Sunday, March 17, 2024 4:04:32 PM

Attn: Placer County Planning Commission

356-1 I am writing to strongly oppose the Draft Environmental Impact Report being utilized for the proposed Housing Element Rezone.

356-2 These sites have significant impact on local areas from traffic to pedestrian safety. As a parent of children who attend Creekview Ranch there is already a huge influx of traffic in the area with current road conditions not being sufficient enough. In addition there is not enough sidewalk access to accommodate the current pedestrian traffic as is.

356-3 These proposed sites are in areas of long standing communities with many senior citizens, these changes will have negative impacts for these property owners.

356-4 Lastly Dry Creek Community is a low density parcel community and is the reason the area residents choose to live here. It is the exact reason moved I moved this area and value our community. This proposal will negatively disrupt the heart of Dry Creek Community.

I respectfully request that you reject this proposal.

Sincerely,
Rebecca Peirce

Sent from my iPhone

LETTER 356: REBECCA PEIRCE

Response to Comment 356-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 356-2
Please see Response to Comment 4-12.

Response to Comment 356-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 356-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 357

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Comments for HCD on Placer County Housing Element Amendment
Date: Monday, March 11, 2024 10:11:29 AM

From: Darcie Pillsbury <pillsburydp@gmail.com>
Sent: Friday, March 8, 2024 3:03 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: Comments for HCD on Placer County Housing Element Amendment

I am writing to express my concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1. I find it incredibly problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low-income housing. Clearly, future residents purchasing a property are making an informed decision to buy a house in, or next to a high-density neighborhood. Placing high-density housing next to residents who have chosen to purchase homes in a rural setting and have lived there for decades is unconscionable.

2. The properties that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties. The existing homes in these communities house older residents who have lived here for decades, many who may be on limited incomes. Potential problems brought on by building apartments nearby on their wells and septic systems could be cost prohibitive for many.

357-1

3. The criteria that the county used to seek out sites for rezoning were random. The categorization of "underutilized" land is most definitely a subjective measure. The strawberry patch is a great example of the randomness of the definition of underutilized. The strawberry and vegetable patch feeds the local community and provides a living for those that tend the fields. Hardly underutilized in my opinion.

4. This plan did not adequately involve the public. Notification of neighbors within "300 feet" of the selected property is not adequate in a rural setting where homes are on a minimum of 1-2 acres. Additionally, it is my understanding that the few residents actually within 300 feet did not receive written notification. Posting signs on a Friday night before a Tuesday hearing is hardly adequate time for residents to be able to be involved and express their concerns.

For the above reasons, I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer county appropriately.

Darcie Pillsbury
Resident District 1

LETTER 357: DARCIE PILSBURY

Response to Comment 357-1

Please see Responses to Comment Letter 62.

Letter 358

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition of Rezoning of 8101 East Dr - Property #8
Date: Tuesday, February 20, 2024 9:25:24 AM

From: Darcie Pillsbury <pillsburydp@gmail.com>
Sent: Wednesday, February 14, 2024 7:23 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Opposition of Rezoning of 8101 East Dr - Property #8

Hello,

My name is Darcie Pillsbury and I attended the presentation yesterday regarding the Residential Land Inventory Rezone. I am following-up my attendance by sending this letter to strongly oppose the rezoning of Property #8, 8101 East Drive to allow for high-density housing.

My parents have lived on Central Avenue for almost 60 years. While the location is obviously no longer the rural oasis miles from the "City" it was then, it is still one of the few communities in Roseville that has retained its rural feel. Residents still ride horses on the roads, children bike through the neighborhood safely, and wildlife flourishes in the few fields that are left in the area. Allowing high-density housing in this community would have an extremely negative impact on the quality of life for my parents and all other residents in one of the last beautiful and tranquil rural communities standing in the Roseville area.

358-1

I also wanted to express my concern about the lack of notification of this project. Only one neighbor in the area was very recently notified by mail about yesterday's workshop. None of the residents even knew about the previous workshops. Once notified of the workshop, this one neighbor and a couple other residents were able to collect over 100 signatures in less than two days indicating strong opposition to this proposal. Clearly, while the property owner does not oppose the rezone, all of the surrounding neighbors do. Had everyone been appropriately notified, we would have been more adequately prepared to articulate our opposition in full.

Finally, while I no longer live in the rural location of my childhood, I am still a Roseville resident and stakeholder in District 1. I live less than a mile north-west of the East Drive proposed rezone and I too will be negatively impacted by increased traffic and loss of the incredibly few natural areas left in Roseville. Not to mention, the loss of access to locally grown produce that is currently being cultivated and sold on the property.

I believe there are better options that don't encroach on long-standing communities where people have purchased homes to escape high-density urban living. I hope you reconsider and remove Property #8 on East Drive from consideration.

Thank you,
Darcie Pillsbury

LETTER 358: DARCIE PILSBURY

Response to Comment 358-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 359

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning in Dry Creek
Date: Tuesday, March 19, 2024 10:56:05 AM
Attachments: Outlook-cxtvqdvo.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:05 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Rezoning in Dry Creek

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Jasmine Pinder <jasminepinder1@yahoo.com>
Sent: Friday, March 1, 2024 9:11 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Rezoning in Dry Creek

Re: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Dear Robyn,

359-1

I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such

359-1 cont.

a drastic change, and I urge you to reconsider the proposal for the following reasons:

359-2

1. It will bring crime into the community. Right now there are apartments on the corner of Vineyard and foothills that always has police activity. We do not want that in our community especially near the school.

2. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans. There has been two fatalities on Vineyard within one year.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads. there has been two fatalities on Vineyard within one year.

359-3

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning.

Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely,

Jasmine Pinder

Sent from my iPhone

LETTER 359: JASMINE PINDER

Response to Comment 359-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 359-2

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 359-3

Please see Responses to Comments 115-2 through 115-7.

Letter 360

From: Jasmine Pinder
To: Placer County Environmental Coordination Services
Subject: Dry creek rezoning parcel 9&10
Date: Friday, March 15, 2024 11:34:45 AM

To whom it may concern,

360-1 I am writing to express my deep concern regarding the proposed placement of low-income apartments in front of our local elementary school. While the initiative to provide affordable housing is commendable, placing such housing directly in front of an elementary school poses several significant challenges and potential risks that warrant careful consideration.

360-2 First and foremost, the safety and well-being of the students must be our top priority. Introducing low-income housing in close proximity to the school may raise security concerns and potentially compromise the safety of the children. Increased foot traffic and unfamiliar individuals loitering in the area could create an environment that is less conducive to a safe learning environment.

360-3 Additionally, the presence of low-income apartments may have a negative impact on the overall atmosphere and reputation of the school. Parents may have reservations about sending their children to a school located in close proximity to affordable housing, leading to decreased enrollment and potentially affecting the school's funding and resources.

360-4 Furthermore, the socio-economic dynamics within the school community could be disrupted by the introduction of low-income housing. Economic disparities among students may exacerbate existing social tensions and contribute to feelings of exclusion or stigmatization among those residing in the apartments.

360-5 Moreover, the placement of low-income housing in front of the elementary school could potentially hinder the school's ability to attract and retain quality educators. Teachers may be reluctant to work in an environment perceived as less safe or less desirable, which could ultimately impact the quality of education provided to the students.

360-6 In light of these concerns, I urge you to reconsider the proposed placement of low-income apartments in front of our elementary school. While affordable housing is undoubtedly important, it is essential to prioritize the safety, well-being, and academic success of our students.

Thank you for considering this matter seriously. I look forward to a thoughtful and informed decision that takes into account the best interests of our community and its youngest members.

Thank you for your support in this matter,

Jasmine

Sent from my iPhone

LETTER 360: JASMINE PINDER

Response to Comment 360-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 360-2
The County acknowledges the commenter's concerns, which have been forwarded to the decision-makers for their consideration. It is noted, however, that the comment enters into speculation as to whether low-income housing would pose a safety risk to children. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment 360-3
Please see Response to Comment 360-2.

Response to Comment 360-4
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 360-5
Please see Response to Comment 360-2.

Response to Comment 360-6
Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 360-2.

Letter 361

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Proposed Rezoning in Dry Creek Rural Community - General Amendment to RM-30
Date: Tuesday, March 19, 2024 10:56:49 AM
Attachments: Outlook-3zxnr1g5.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:07 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to Proposed Rezoning in Dry Creek Rural Community - General Amendment to RM-30

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Ryan Pinder <ryan.pinder@gmail.com>
Sent: Tuesday, March 5, 2024 11:14 AM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Opposition to Proposed Rezoning in Dry Creek Rural Community - General Amendment to RM-30

Dear Robyn Dahlgren,

I hope my email finds you well.

361-1 I am writing to you as a concerned resident of the Dry Creek Area, 95747, to express my strong opposition to the proposed rezoning of several properties, which would allow for high-density, low income housing developments.

My family and I moved to the Dry Creek area 3 years ago and have witnessed the developments that have taken place along cook riolo road (as well as the surrounding area).

361-2 The proposed development for high-density low income housing on the parcel of land across from the Creekview Ranch School, is a mistake on many levels.
Please do not jeopardize the community and surrounding natural habitat, by allowing this rezoning to proceed.

361-3 If this development project were to proceed it would have detrimental impacts to the surrounding environment.
I have seen ground nesting birds displaced because of the recent Whispering Creek development.

361-4 I have also already seen an increase in accidents in the area and can only imagine the negative impact a high-density development would have to all, including the families and children attending the Creekview Ranch School across the street.

It is clear what this area represents, not just to those that are existing residents but also to potential future ones.
It appears obvious also to developers just based off of the projects that have been done in this community.
Such as, Morgan Creek, Morgan Greens, Whispering Creek, Morgan Ranch and now the Cabral Ranch, all single family residences built in line with the surroundings.
This is not an area of urban sprawl, like what is occurring on Fiddyment. There are many places still available in Roseville that would be better suited for low income high-density housing development projects.
The appeal for the Dry Creek and surrounding area, is just the opposite of that and probably the biggest factor in why people move into this community.

361-5 A rezoning would jeopardize all that has been already established and be a contributing factor to soaring increases in crime, traffic accidents and a complete degradation of nature. I always thought California was pro environment and for preserving nature. Like us, I am sure that you feel this County is one of the best places to live and work in Northern California. if not most of California as a whole. And the rapid increase in communities around Roseville, lends strong evidence of that. However, it can quickly be undone by just a few poor decisions and instead of being a city with a beacon of light that people admire, it becomes a lesson on what not to do. The damage would be irreversible! Please protect this area and the community that lives and resides here, by strongly opposing this rezoning effort.

Thank you,

Ryan Pinder

LETTER 361: RYAN PINDER

Response to Comment 361-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 361-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 361-3
Potential impacts to biological resources are addressed in Chapter 5, Biological Resources, of the Draft EIR. In addition, Mitigation Measures 5-2(s) through 5-2(ac) of the Draft EIR require preconstruction surveys for several nesting bird species, including tricolored blackbird, burrowing owl, Swainson's hawk, California spotted owl, and other nesting birds and raptors protected under the MBTA and CFGC. In addition, if detected, Mitigation Measures 5-2(s) through 5-2(ac) require that buffers be established around the nests, and that construction shall not occur within such buffers until young have fledged .

Response to Comment 361-4
Please see Master Response 4 – Traffic Safety.

Response to Comment 361-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 362

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:08:34 AM

From: Ryan Pinder <ryan.pinder@gmail.com>
Sent: Friday, March 8, 2024 1:06 PM
To: jess.negrete@hcd.ca.gov; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

My very Dear Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may in fact be on limited incomes. This would make future problems brought by the addition of apartments for their own wells and septic systems, being cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

362-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land appears to be subjective in its measure. For example, the plot of land which now hosts a strawberry and vegetable patch which feeds the local community, is hardly "underutilized".

The idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit and had nothing to do with a state mandate, or even a court ordered situation. It was just the agreement the attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city (not a county) where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups, such as the school boards of the districts to which the students from these

362-1 cont.

developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate timing for the public to be able to respond and bring to light the various problems with each site, as well as any potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Thank you for addressing our concerns as we love our community and want to see it continue to thrive in a sustainable way that protects its core values, we have all come to love and appreciate.

Best of regards,

LETTER 362: RYAN PINDER

Response to Comment 362-1

Please see Responses to Comment Letter 62.

Letter 363

From: Ryan Pinder
To: Placer County Environmental Coordination Services
Subject: DEIR - District 1
Date: Friday, March 15, 2024 8:49:39 PM

Hello there,

I am writing concerning the proposed rezoning and development of district 1, for low to very low income residences and the concern regarding its impact to the environment.

The first area in question is Parcel 9 and 10, that sits directly across from the Creekview Ranch Elementry school.

363-1 At the moment, the area of the Dry Creek community is relatively quiet and has low light, low traffic and low noise pollution.
This however, has increased with the developments of the surrounding areas, like Hidden Crossing, all the new builds along Fiddyment and baseline, as welll as the proposed horrendous plan, to build over a hundred homes on the property surrounding the Creekview ranch School.

363-2 Currently we see deer, baby deer, birds of prey, ground nesting birds and their young, important flood planes which have worked effectively in the area. Wild flowers, fields of green that protect the nature and it's beautiful green vegetation and trees. All of this would be destroyed if these developments are allowed to go through, and if the rezone is passed.

363-3 Light pollution would increase tremendously as would noise pollution, and quality of the air. A leading cancer causing carcinogen that exists, is break dust. With the increase in traffic that these proposed developments would without certain being an increase of respiratory illness among the children at the school, the Dry Creek residents both elderly and young alike. Existing respiratory issues like asthma or chronic cough would increase causing further strain on the medical and health communities, already stretched thin from the explosion of homes over Placer county.

It is time that the county and those responsible start being more stringent on these development projects and to begin caring about what is best for the existing Placer communities and families that live here. And to NOT just try and hit a quota that some politician somewhere thought up but will not be around to see the damage caused by their poor judgement or even lack thereof.

363-4 The poor and undeserved will forever be here no matter how many houses you build or how many communities are ruined from trying. It's time to start protecting the communities that are desirable and the people that reside in them. Also the wild life, the nature and quality of air that exists in this part of the County. We do not need or want any more pollution. We do not need or want any further destruction of nature and its wildlife. Neither do we want increased sickness, noise and light pollution.

This thought is the same for the remaining parcels wanting to be rezoned in District 1.

Please put a stop to this and give serious consideration to the long term affects these projects would bring to the environment as a whole.

363-4 cont.

Thank you for your consideration and we hope those responsible do the right thing.

Best of regards,

Ryan Pinder

LETTER 363: RYAN PINDER

Response to Comment 363-1
Please see Master Response 1 — Non-EIR/Administrative Issues.

Response to Comment 363-2
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, potential impacts to special-status species and habitat are addressed in Chapter 5, Biological Resources, of the Draft EIR. Regarding habitat concerns, it is noted that the subject parcels are located within the boundaries of the Placer County Conservation Program (PCCP). PCCP General Condition 3 requires payment of Land Conversion Fees for impacts to any natural land cover including oak woodlands, oak savannah, annual grasslands, etc. That Land Conversion Fee does not simply go into a fund, but is utilized by the PCA to purchase and preserve the same acreage of that land cover type at an off-site location. The PCCP contains provisions requiring the PCA to replace impacted habitat within a stated time frame. As a result, although impacts to habitat would be considered a significant impact, participation in the PCCP and payment of the Land Conversion Fee mitigates those impacts to a less than significant level.

Response to Comment 363-3
Please see Master Response 1 — Non-EIR/Administrative Issues. In addition, potential impacts regarding light pollution are address in Section I of the Initial Study prepared for the proposed project. As discussed therein, pursuant to Section 17.54.070(A)(2)(i) of the Placer County Code, all future development of the rezone sites would be subject to compliance with the applicable sections of the Placer County Design Guidelines related to light pollution, including, but not limited to, shielding of fixtures such that direct rays do not pass property lines. In addition, the Multifamily and Mixed Use Design Manual includes design guidelines for exterior lighting, such as DG-48, which requires that exterior light fixtures be mounted at the lowest appropriate height to reduce impacts on neighbors and to preserve natural settings and night sky views. In addition, Mitigation Measure I-1 would require that a lighting plan be submitted prior to approval of any permits authorizing construction on a rezone site, demonstrating that proposed lighting is Dark-Sky compliant as specified by the International Dark-Sky Association.

Response to Comment 363-4
Please see Master Response 1 — Non-EIR/Administrative Issues.

Letter 364

March 7, 2024

To All Concerned:

Our son died of suicide. He was a Placer County resident, drug addict, on disability, and lived for a time in low-income housing. I VOTED NO on Measure 1! Not because everything it supports is not needed, but because Placer County has OVERSTEPPED its' boundaries by selecting rural area property #8 in the midst of 1 to 2 acre homes to be rezoned R22-R30 for Low to Low-Low income residence. I know this is needed but not at the expense and detriment of hundreds of residents who chose to buy and raise their families in this rural-area zone. The county alone should not have the authority to do this!

364-1

During our son's time in low-income housing he was housed among drug addicts and dealers, bicycle theft rings, and violent individuals and criminals all in classified "low-income housing". I had to pick him up with a face battered and bruised, I was called by the cops, and it was ongoing and endless. He lasted 3 months out of a 6 month lease. We do not want this in our neighborhood. You must have programs in place before building housing and the housing should not be built in rural areas NOT ZONED or intended for it. This would change each and every one of our lives FOREVER and not in a positive way. Please vote to preserve the rural areas as they were intended and protect the old established neighborhoods by voting against rezoning.

Please vote 'NO ON REZONING'!

Sincerely,

Karen and Izzy Plarisan
2123 Carol Ln
Roseville, CA 95747
916.204.3824

LETTER 364: KAREN AND IZZY PLARISAN

Response to Comment 364-1

Please see Master Response 1 — Non-EIR/Administrative Issues. The commenter's concerns have been forwarded to the decision-makers.

Letter 365

From: Karen Plarisan
To: Placer County Environmental Coordination Services
Subject: Rezoning of East/Baseline Roseville
Date: Monday, February 12, 2024 2:34:15 PM

RE: The True Impact of Rezoning:

365-1

It is difficult and heartbreaking to even think about the rezoning of the properties on East/Central & Baseline/East. The potential for disruption in our beloved neighbor will be tremendous, being felt by each one of us that purchased houses here to live as much as a country life as possible. Crime will continue to increase, TRAFFIC on Baseline is already problematic, we no longer have the deer, owls, and coyotes like we use to and law enforcement will be spread thin! WHY would you even consider rezoning to add up to 875 living quarters in a small area? This area can NOT handle the influx.

Think outside the box and consider rezoning empty commercial buildings and land. This is not the proper area to potentially add up to 2000 people. Think about the impact thoroughly, and come and survey the people that live here and understand the impact.

DON'T JUST PUT THE SIGN UP 5 DAYS BEFORE THE MEETING!!!

Sincerely,

Karen Plarisan
916.204.3824

LETTER 365: KAREN PLARISAN

Response to Comment 365-1

Please see Master Response 1—Non EIR/Administrative Issues

Letter 366

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:09:19 AM

From: Molly Plarisan <mollynaake@gmail.com>
Sent: Friday, March 8, 2024 1:39 PM
To: jess.negrete@hcd.ca.gov; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

366-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting

366-1 cont.

is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Kindest regards,
Molly Plarisan
2170 Central Ave
Roseville, CA 95757

LETTER 366: MOLLY PLARISAN

Response to Comment 366-1

Please see Responses to Comment Letter 62.

Letter 367

From: Molly Plarisan
To: Supervisor Gore
Subject: Rezoning Program - District 1 (East Dr/Central Ave & Baseline Rd/East Dr)
Date: Monday, February 12, 2024 12:03:51 PM

Hello,

I am writing to express my concerns regarding the rezoning program for Supervisorial District 1. Specifically, the four properties on East Drive/Central Avenue and Baseline Rd/East Drive. The addition of high-density housing to our neighborhood would be absolutely devastating to our tight knit community. We all live in this community because we value the last bit of small town feel that our community offers to our families. My family has owned property on Central Ave since 1921. My grandfather, father, my son and I were all born and raised here on Central Ave. All four generations of our family are proud to call this community our home. My husband was also raised in this community on Carol Lane, where his parents still currently reside. We love having our family close and having neighbors that have pretty much turned into family. You might say, if you don't like the rezoning changes, why don't you just move to a new area? My ENTIRE FAMILY would have to move away from our family legacy property that has been in our family for over 100 years. This would be absolutely heartbreaking to us.

We live in this community to get away from the hustle and bustle of the city life. Bringing city life to our doorstep would be a very unwelcomed addition to our rural neighborhood. Not to mention the huge increase of traffic this high-density housing this would bring. It is already extremely difficult pulling out of our neighborhood onto Baseline Road with the current traffic load. The high density and specifically low-income housing would also bring a huge safety concern to our area in regard to crime. This would have a huge negative impact on our community's property values. Our emergency services support is already operating at what seems to be their maximum capacity. Our local schools have insufficient capacity to handle the huge influx of kids this would bring. The alteration of the natural water course and its riparian zone would remove already limited habitat for important native wildlife species.

367-1

We were given extremely minimal notice in regard to this project. ONE neighbor received a letter in the mail mentioning this project. The sign on the corner of Baseline and East was placed within less than a week of the first meeting on Tuesday 2/13. Many neighbors didn't even notice the small sign until it was brought to their attention over this past weekend by surrounding neighbors. This does not leave adequate amount of time for folks to research this project and arrange time off work, childcare or transportation to Tuesday's meeting. In this short amount of time our neighborhood has collected 115 signatures from surrounding residents on a petition opposing this project. We look forward to voicing our concerns at Tuesday's meeting.

Please take mine and my neighbors concerns to heart, as if this high-density low-income housing were being proposed on your doorstep.

Thank you for your consideration.

Kindest regards,
Molly Plarisan
2170 Central Ave Roseville, CA 95747

LETTER 367: MOLLY PLARISAN

Response to Comment 367-1

Please see Master Response 1 — Non-EIR/Administrative Issues, Master Response 2—Social and Economic Impacts, Master Response 4 – Traffic Safety, Master Response 6 – Impacts to Local Schools, Response to Comment 336-4 and Response to Comment 59-2

Letter 368

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning Program - District 1 (East Dr/Central Ave & Baseline Rd/East Dr)
Date: Tuesday, March 19, 2024 10:56:54 AM
Attachments: Outlook-30irdxma.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:07 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Rezoning Program - District 1 (East Dr/Central Ave & Baseline Rd/East Dr)

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Molly Plarisan <mollynaake@gmail.com>
Sent: Tuesday, March 5, 2024 3:52 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Rezoning Program - District 1 (East Dr/Central Ave & Baseline Rd/East Dr)

Hello,

368-1

I am writing to express my concerns regarding the rezoning program for Supervisorial District 1. Specifically, the four properties on East Drive/Central Avenue and Baseline Rd/East Drive. The addition of high-density housing to our neighborhood would be absolutely devastating to our tight knit community. We all live in this community because we value the last bit of small town feel that our community offers to our families. My family has owned property on Central Ave since 1921. My grandfather, father, my son and I were all born and raised here on Central Ave. All four

generations of our family are proud to call this community our home. My husband was also raised in this community on Carol Lane, where his parents still currently reside. We love having our family close and having neighbors that have pretty much turned into family. You might say, if you don't like the rezoning changes, why don't you just move to a new area? My ENTIRE FAMILY would have to move away from our family legacy property that has been in our family for over 100 years. This would be absolutely heartbreaking to us.

We live in this community to get away from the hustle and bustle of the city life. Bringing city life to our doorstep would be a very unwelcomed addition to our rural neighborhood. Not to mention the huge increase of traffic this high-density housing this would bring. It is already extremely difficult pulling out of our neighborhood onto Baseline Road with the current traffic load. The high density and specifically low-income housing would also bring a huge safety concern to our area in regard to crime. This would have a huge negative impact on our community's property values. Our emergency services support is already operating at what seems to be their maximum capacity. Our local schools have insufficient capacity to handle the huge influx of kids this would bring. The alteration of the natural water course and its riparian zone would remove already limited habitat for important native wildlife species.

368-1 cont.

We were given extremely minimal notice in regard to this project. ONE neighbor received a letter in the mail mentioning this project. The sign on the corner of Baseline and East was placed within less than a week of the first meeting on Tuesday 2/13. Many neighbors didn't even notice the small sign until it was brought to their attention over this past weekend by surrounding neighbors. This does not leave adequate amount of time for folks to research this project and arrange time off work, childcare or transportation to Tuesday's meeting. In this short amount of time our neighborhood has collected 115 signatures from surrounding residents on a petition opposing this project. We look forward to voicing our concerns at Tuesday's meeting.

Please take mine and my neighbors concerns to heart, as if this high-density low-income housing were being proposed on your doorstep.

Thank you for your consideration.

Kindest regards,
Molly Plarisan
2170 Central Ave Roseville, CA 95747

LETTER 368: MOLLY PLARISAN

Response to Comment 368-1

Please see Response to Comment 367-1.

Letter 369

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Fw: MARCH 7th URGENT!
Date: Thursday, March 7, 2024 1:55:10 PM

From: fran@californiadreamcastles.com <fran@californiadreamcastles.com>
Sent: Thursday, March 7, 2024 1:35 PM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: RE: Fw: MARCH 7th URGENT!

This e-mail is in response to additional building of a housing development in Granite Bay. As a resident of Granite Bay since 1993 I have seen many changes in the Granite Bay area. At that time there are country farm houses, Wexford, Treelake and the area above the lake. Many, many developments have come into this community. We are actually pretty much built out. This and other building have deeply affected the traffic and crime in the area. Traffic is unbelievable, the worst being at the Auburn Folsom/Douglas interchange. From 7 am to 10 and 330pm to 630. As many cars as the turn lights will accommodate is how many cars go by everyday. Now I cannot cross Douglas without a light except at about 8 pm on in the evening. I have a friend who owns a business close to Douglas and Barton. She gets off work about 5. She says even the 1/3 block distance to a light to u-turn is not reachable so she often drives to Barton, makes a u turn and waits on the light to turn left to go home.

369-1

I am also the head of Neighborhood Watch in The Woods at Granite Bay. In the early 90s crime was pretty much not existent. There is crime here not. There was a break in 2 doors down a while back. My neighbor very close had someone go through their gate and mess up their watering system. Chasing the Fed Ex or UPS trucks and removing packages is fairly common. As we have no police department, on the sheriff's department, if anything is called in, the crook is long gone before the Sheriff's officers get there.

Please, please, no more major building in this small community. People moved here because it is a small, calm, safe community. People have paid a premium for housing for the ambiance of the area.
Building more major communities is very detrimental to the area. If we wanted major traffic and crime we would have moved to Citrus Heights or Rancho Cordova. Please do not destroy our community.

Fran Predoehl

From: Rhiannon Beck <rmtwn2@gmail.com>
Sent: Tuesday, March 5, 2024 4:30 PM
To: Dan Beck <DBBeck114@gmail.com>; Laura Rettig <ljspad8@gmail.com>; Fran Schreck <fran@californiadreamcastles.com>; jeff@jeffsessionsre.com; pastormatthewoliver@gmail.com
Subject: Fwd: Fw: MARCH 7th URGENT!

Hello Friends,
This is with regard to the re-zoning of certain properties that the Placer County Board of Supervisors are

tying to push through for high-density and low-income. One property is located at the corner of Auburn-Folsom Road and Fuller Drive - next to Cavitt Junior High School. This is one of the worst possible places to dump 1,500 people. Auburn-Folsom is already impacted, there are no public transportation services, and not to mention, a water way that there has been NO Envioronmental Impact Report done. The Board is now under the gun and waiving a bunch of inspections and reports in order to meet a deadline that they have known about since 2017. Oh, by the way, have I mentioned that since 2017, they have been accepting money from developers (I read as BRIBE) so that the developer/owner does NOT have to set aside any units for low income? Where is that money, I ask.....

Please consider putting some words together to help us stop the over building of our rural areas with high density/low-income/tiny houses for homeless.

Thank you,

Rhiannon

Hi All,

We have looked more carefully at the March 7th deadline and realize that this needs be addressed directly and separately by everyone immediately.

See attached link: https://www.placer.ca.gov/DocumentCenter/View/77692 These pages (F-35 to F-39) are directly about the Lot 26 rationale and need to be picked apart. It also says the county plans will be amended to allow expedited review of large sites with truncated enviro requirements!! It's amazing that we only have 7 days (not even business days) to address this.

The link above and corresponding pages are the rationale behind why they believe that 12.3 acres are the developable area. Remember that the staff admitted that the argument is weak, so I think everyone should write a letter in their own words as to why the other examples they are giving are NOT the same as lot 26 and are bad examples. Whatever other reasons you can find that can cast doubt on this would be great.

We are still crafting a letter for the EIR but have realized the EIR letter will not work as a one size fits all letter that could be used for this as well. So, a separate letter that is directed toward this Housing Element comment would be more effective.

Please share this far and wide and get everyone to pitch in their own words and share their comments to the email addresses below:

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

send via email to BoardClerk@placer.ca.gov AND kkedinge@placer.ca.gov (Kally Kedinger-Cecil, Senior Planner)

Regards,

-- Erik



LETTER 369: FRAN PREHOEHL

Response to Comment 369-1

Please see Master Response 1—Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 370

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Objection to rezoning of property at 8989 Auburn Folsom Road
Date: Tuesday, February 20, 2024 9:21:12 AM

From: kellen prindiville <kprindi@gmail.com>
Sent: Tuesday, February 13, 2024 10:39 AM
To: Suzanne Jones <SuzanneJones@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Objection to rezoning of property at 8989 Auburn Folsom Road

Supervisor Jones and the Clerk of the Board,

370-1 Please accept the following as my objection to the rezoning of the property at 8989 Auburn Folsom Rd as part of the Housing Element Program. My family and I live directly behind Cavitt Jr. High and would be directly affected by a rezone and building on this property. We are opposed to the rezone for the following reasons:

370-2
- Traffic concerns on Auburn Folsom Rd/Douglas Blvd: Traffic on Auburn Folsom Road and Douglas Blvd is already extremely high. During peak hours, Auburn Folsom Road is backed up south to Eureka Road (past the property of concern). Adding any additional traffic would make the problem worse and increase safety concerns. Two new residential developments adjacent to the property have recently been built, again with no visible concern for traffic safety. Auburn Folsom Road and Douglas Blvd also turn into racetracks in the late evenings. Adding any more vehicles to the area would only exacerbate the safety concerns. *Please provide peak hour traffic counts and the Level of Service that the following intersections are performing at during peak hours: Auburn Folsom Rd/Eureka Rd; Auburn Folsom Rd/Fuller Dr; Auburn Folsom Rd/Douglas Blvd. Please also provide accident data from the past 5 years for Auburn Folsom Road from Country Ct to Robin Hood Way and for Douglas Blvd from Arabian Cir to Iris Place.

370-3
- Traffic concerns on Fuller Drive: Traffic during drop off and pick up times is already a safety concern for students. Students cross the street blindly while buses and cars back up on Fuller Drive waiting at the signal to Auburn Folsom Rd. Adding any additional traffic to Fuller Drive would also make this problem worse. I assume a proposed housing project would have ingress and egress on Fuller Drive (and not on the extremely busy Auburn Folsom Rd), so this would, again, make the problem worse.

370-4
- Parking concerns on Fuller Drive: High density housing typically does not provide enough parking spaces for the amount of vehicles residents have. Where will residents park their cars, on Fuller Drive?

370-5
- Cavitt Jr. High: Adjacent to the property, Cavitt is packed with people when

370-5 cont.

school is not in session as people use it to get to Folsom Lake. The amount of vandalism, litter, grafiti, etc has gone up significantly in the past few years. *Please review the Sheriff's logs and discuss with Eureka Union School District. The school has had major vandalism, had to install lighting and cameras, and had to hire night time security. The amount of money the school district has had to spend to fix and prevent vandalism takes away from funds that could be used for students. The vandalism and partying that happens at the school also keeps neighbors awake at night. Adding another 500 households next door to the school will not improve the situation.

370-6

I grew up here in Granite Bay and have always loved the rural small community we live in. So much so that, after moving away for college, I worked hard to move back to be able to raise my family here. High density residential building does not fit into the Granite Bay Community Plan and does not hold the promise that Granite Bay residents expect to be upheld by that Plan. Please consider that in your deliberations.

Thank you for your time and consideration,

Kellen Prindiville, Homeowner
8913 Weatherby Court
Granite Bay, CA
916-390-6048

LETTER 370: KELLEN PRINDIVILLE

Response to Comment 370-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 370-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. In addition, traffic count data is available on the Placer County Open Data website: https://gis-placercounty.opendata.arcgis.com/. Traffic collision data is available in the County's Local Roadway Safety Plan, which is publicly available through the Transportation Safety website: https://www.placer.ca.gov/7788/Transportation-Safety. Level of service analysis is typically provided in conjunction with active land development projects, therefore recent level of service analysis is available through the County's Projects website: https://www.placer.ca.gov/1772/Projects.

Response to Comment 370-3
The proposed project does not include any site-specific development plans, so the site access considerations cannot be evaluated. Regardless, if the site develops the project applicant would be responsible for completing a transportation assessment, in compliance with the County's Transportation Study Guidelines. The Transportation Study would include a detailed analysis of the project's traffic generating characteristics and any effects of the project on the surrounding transportation network. The Transportation Study would address off-site transportation for all modes, including vehicles, pedestrians, and bicycles. If development is proposed on site 26, the proposed project would also be reviewed in accordance with the Placer County Land Development Manual for roadway and encroachment standards. The project applicant would be required to provide engineering designs to meet applicable requirements, based on the size and location of the proposed project.

Response to Comment 370-4
On-site parking would be required for future site development in compliance with the Multifamily and Mixed Use Design Manual and the Placer County Zoning Ordinance.

Response to Comment 370-5
Please see Master Response 1 – Non-EIR/Administrative Issues

Letter 371

From: Steve Quigley
To: Placer County Environmental Coordination Services
Subject: Dry Creek Rezone
Date: Monday, March 18, 2024 11:15:48 AM

371-1

I strongly oppose the proposed rezoning in the Dry Creek area.
This is an ongoing agricultural area that should not be taken over as a Roseville/ Placer county spot to do a mass build of housing. The infrastructure and transportation capacity cannot handle this type of project. There are numerous areas in the Roseville/ Placer area that are much more amenable to this project.
This needs to be stopped.

LETTER 371: STEVE QUIGLEY

Response to Comment 371-1

Please see Master Response 1—Non-EIR/Administrative Issues.

Letter 372

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Rezoning
Date: Tuesday, March 19, 2024 10:57:41 AM
Attachments: Outlook-ehfiu1n4.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:09 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to Rezoning

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: F Irene <florarafii@gmail.com>
Sent: Saturday, March 9, 2024 8:02 AM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Opposition to Rezoning

Dear Robyn Dahlgren,

372-1

I hope this email finds you well. I am writing to you with deep concern regarding the proposed rezoning of sites 7, 8, 9, and 10 in the Dry Creek community to accommodate high-density, low-income housing.

As a resident of the Dry Creek community, I strongly oppose this rezoning initiative and urge you to reconsider its implications on our neighborhood. While I understand the need for

affordable housing options, the proposed plan threatens to significantly alter the character and quality of life in our community.

Here are some of the key points illustrating the potential negative impacts of this rezoning:

1. **Strain on Infrastructure**: The sudden influx of residents due to high-density housing will put immense pressure on our existing infrastructure, including roads, schools, and utilities. Without adequate upgrades, this could lead to traffic congestion, overcrowded schools, and strained resources.
2. **Decreased Property Values**: Introducing low-income housing into the area may lead to a decrease in property values for current homeowners. This not only affects our financial investments but also undermines the sense of stability and pride we have in our community.
3. **Impact on Safety and Security**: High-density housing projects often bring with them an increase in crime rates and safety concerns. As residents, we prioritize the safety and security of our families, and we fear that this rezoning could jeopardize that.
4. **Environmental Concerns**: Overdevelopment could have adverse effects on our local environment, including increased pollution, loss of green spaces, and strain on natural resources. Preserving our environment is essential for the health and well-being of current and future generations.

372-1 Cont.

I implore you to consider alternative solutions that address the need for affordable housing without compromising the integrity of our community. This could include exploring other locations for high-density housing, incentivizing mixed-income developments, or investing in infrastructure improvements to support sustainable growth.

Furthermore, I urge you to prioritize community input and engage in transparent communication throughout the decision-making process. As stakeholders, we deserve to have our voices heard and to participate in shaping the future of our neighborhood.

Thank you for taking the time to consider my concerns. I trust that you will act in the best interest of the Dry Creek community and make decisions that uphold our values and preserve our quality of life.

Sincerely,

Dr. Flora Rafii

LETTER 372: FLORA RAFII

Response to Comment 372-1

Please see Responses to Comment Letter 350.

Letter 373

March 7, 2024

Placer County Board of Supervisors
Attn.: Senior Planner- Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603
kkedinge@placer.ca.gov

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Tracy Rainsbury. I am a Placer County resident with an address at 7134 Stillwater Ct. Granite Bay, CA 95746 located in the Granite Bay Village. I have been a resident in this area for over 13 years.

373-1

In regard to the public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors **reject** the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program. Site 26 is a beautiful, 18 acres of unique rich wildlife and has value as a wildlife habitat; which should be an exemption violating the Housing Element Amendment.

In addition, I am writing in support of the letter written by Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024. I respectfully request the Board consider the concerned expressed therein as an extension of my own opinion.

Respectfully,

Tracy Rainsbury

LETTER 373: TRACY RAINSBURY

Response to Comment 373-1

Please see Responses to Comment Letter 162.

Letter 374

From: Candy Ransdell
To: Placer County Environmental Coordination Services
Subject: Rezoning of Dry Creek
Date: Monday, March 18, 2024 8:03:35 AM

374-1

We already suffer from lack of services ; we do not need high density housing that will bring more demand for services that are already lacking.
I live off of Walerga Rd - I've never seen any type of traffic control. People actually blast thru red lights and speed. I pick up trash along part of Walerga because there is no routine maintenance. I've picked up all sorts of building materials as well as bottles, cans ,food, containers and even parts of the overpass guardrail where there must have been some sort of accident.
No on rezoning!
M. Ransdell

Sent from my iPad

LETTER 374: CANDY RANSDEL

Response to Comment 374-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 4 — Traffic Safety.

Letter 375

From: K Coppedge
To: Placer County Environmental Coordination Services
Subject: Dry Creek Objections
Date: Monday, March 18, 2024 8:57:54 AM

375-1

I have lived here since 2005. My husband and I are seniors. We purchased BECAUSE of the current zoning. We voted for the current supervisors. That will change.

It appears that builders have more influence in this county than residents. What does this lead to...responsible adults moving out and low income moving in. It makes NO sense to have low income housing miles from stores. Will they walk or bike to the grocery stores ..there are no sidewalks out here. There is a ton of land close to stores that can be used instead.
It can only be that there is a direct link between builders and supervisors. You are taking away our home values to put them into the pockets of developers.

You know better and you do it anyway. You tried to sneak this by residents because you knew what you are doing is wrong. As residents ... who you were elected to protect ..we will get rid of you. Not a threat a promise from all of us.

Kris and Steve Rath

LETTER 375: KRIS AND STEVE RATH

Response to Comment 375-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 376

From: Ed Reeder
To: Placer County Environmental Coordination Services; Planning Commission
Subject: A full, proper EIR is needed for "Project 26" (site 26)
Date: Saturday, March 9, 2024 12:12:09 PM

376-1

ECS and Commissioners:
Please provide a proper EIR for "Project 26". A programmatic EIR will not do for this sensitive and important property. Now is not the time for hasty decisions.

Respectfully,

Ed Reeder
407 Merion
Granite Bay, CA

LETTER 376: ED REEDLER

Response to Comment 376-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 5 — Programmatic EIR vs. Site-Specific EIR.

Letter 377

From: Kathy Remington
To: Placer County Environmental Coordination Services
Subject: Apartments Near Cavitt Middle School
Date: Sunday, March 10, 2024 10:28:15 AM

377-1

The proposal for apartments in this area is absurd. The traffic conditions in Granite Bay is a nightmare now and this will make it even worse. We don't need low income apartments near a school let alone in Granite Bay.

You need to rethink this proposal with the crowding and repercussion it's going to cause.

Thank you,
Kathy R.

Yahoo Mail: Search, Organize, Conquer

LETTER 377: KATHY REMINGTON

Response to Comment 377-1

Please see Master Response 1 — Non-EIR/Administrative Issues. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 378

From: sherrill renfro
To: Placer County Environmental Coordination Services
Subject: Environmental Impact of rezoning of parcel # 8
Date: Tuesday, March 5, 2024 6:49:00 PM

Shirlee Merrington and the County Board of Supervisors,

I have taught in the Dry Creek school district for the last 30 years. I also live next to the proposed rezoning parcel # 8. Over the years I have seen and taken pictures for my students of the wildlife living on or traveling through that area. I have seen coyotes, eagles, hawks, skunks, deer, bees, and bobcats to name but a few.

378-1

I have loved seeing these animals right across the street. My students have also benefited from the pictures that were taken. Each time that I see a new animal, I take pictures and bring them to class. These pictures would then be the cornerstone for our next unit of study.

I am saddened and curious as to the environmental impacts of rezoning this area. It seems as though our surrounding area is being bulldozed and covered by asphalt and cement. Is this the legacy that the current board of supervisors wants to be remembered by????

--
Sherrill Renfro

LETTER 378: SHERRILL RENFRO

Response to Comment 378-1

Please see Master Response 1 — Non-EIR/Administrative Issues. Regarding habitat concerns, it is noted that the subject parcels are located within the boundaries of the Placer County Conservation Program (PCCP). PCCP General Condition 3 requires payment of Land Conversion Fees for impacts to any natural land cover including oak woodlands, oak savannah, annual grasslands, etc. That Land Conversion Fee does not simply go into a fund, but is utilized by the PCA to purchase and preserve the same acreage of that land cover type at an off-site location. The PCCP contains provisions requiring the PCA to replace impacted habitat within a stated time frame. As a result, although impacts to habitat would be considered a significant impact, participation in the PCCP and payment of the Land Conversion Fee mitigates those impacts to a less than significant level.

Letter 379

From: sherrill renfro
To: Placer County Environmental Coordination Services
Subject: Environmental impact of rezoning of parcel #8
Date: Saturday, March 16, 2024 5:20:05 PM

379-1

I have taught in the Dry Creek school district for the last 30 years. I also live next to the proposed rezoning parcel # 8. Over the years I have seen and taken pictures for my students of the wildlife living on or traveling through that area. I have seen coyotes, eagles, hawks, skunks, deer, bees, and bobcats to name but a few.

I have loved seeing these animals right across the street. My students have also benefited from the pictures that were taken. Each time that I see a new animal, I take pictures and bring them to class. These pictures would then be the cornerstone for our next unit of study.

I am saddened and curious as to the environmental impacts of rezoning this area. It seems as though our surrounding area is being bulldozed and covered by asphalt and cement. Is this the legacy that the current board of supervisors wants to be remembered by????

--
Sherrill Renfro

--
Sherrill Renfro

LETTER 379: SHERRILL RENFRO

Response to Comment 379-1

Please see Response to Comment 378-1.

Letter 380

From: sherrill renfro
To: Placer County Environmental Coordination Services
Subject: Rezoning of Parcel #8
Date: Sunday, March 3, 2024 5:31:19 PM

Shirlee Merrington and the County Board of Supervisors,

I am writing this email concerning the rezoning of parcel #8 on the corner of Baseline and East Ave. Rezoning of our neighborhood, parcel #8 will create a very perilous environment. Our home is on the corner of East and Carol Lane. Daily we see numerous pedestrians walking around the block with their children on bikes, pushing strollers, riding horses, etc.

380-1

If parcel #8 on Baseline and East Ave is rezoned for 20 to 30 residences per acre it would inundate our area with traffic. This would cause the possibility of significant catastrophic car and pedestrian accidents.

East Ave is barely big enough for a slow moving vehicle and the pedestrians. It is unimaginable and irresponsible for the county to rezone this parcel of land.

Please help to keep our neighborhood safe,
--
Sherrill Renfro
2021 Carol Ln, Roseville, CA 95747

LETTER 380: SHERRILL RENFRO

Response to Comment 380-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 4—Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 381

From: Mike Renfro
To: Placer County Environmental Coordination Services
Subject: Rezone of Baseline and East Dr. Specifically Parcel #8
Date: Sunday, March 3, 2024 5:20:47 PM

Dear Shirlee Merrington and the Board of Supervisors:

381-1

We have lived in our home on Carol Lane since 1993. The main reason that we bought our home here is because of the amount of land that came with the home and the unique neighborhood tucked into this area of Roseville. We are very close to the proposed rezone and it makes me nervous of what the future would look like on East Dr., Carol Lane, Central, etc. We would lose the very soul of our neighborhood with more traffic, congestion, chaos and who knows what else.
We love watching our neighbors ride by our house on their horses. We see local families walking by, people walking their dogs and kids riding bicycles throughout our quiet community. It's highly likely that traffic will increase in the area and, without sidewalks, walking, biking and especially riding horses will be too dangerous.
This rezone is unjust and makes absolutely no sense!

Sincerely,

Mike Renfro
2021 Carol Lane
Roseville, CA 95747
916-996-6453

LETTER 381: MIKE RENFRO

Response to Comment 381-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 382

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Strongly Oppose Rezoning Parcels 9&10 on Cook Riolo
Date: Tuesday, March 19, 2024 10:57:50 AM
Attachments: Outlook-voxrns1o.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:09 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Strongly Oppose Rezoning Parcels 9&10 on Cook Riolo

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: James Rice <jamesjulianna@sbcglobal.net>
Sent: Monday, March 11, 2024 8:07 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Strongly Oppose Rezoning Parcels 9&10 on Cook Riolo

To County Officials,

382-1

We live in Morgan Greens in the Dry Creek Community. The traffic of Cook Riolo in just the past two years has increased exponentially due to the new housing developments on Cook Riolo. Along with this increased traffic, there are now more incidents of high speed vehicles and motorcycles. We have not seen one patrol officer in this area even though there is a Police Sub Station at the corner of PFE and Cook Riolo. It is currently unstaffed and we suspect that will not change.

382-1 cont.

There is a community nature area in Dry Creek which sees many motorcycles using the paths as short cuts to developments further down on PFE. There are gun shots in the park at night and we no longer feel safe walking past dark. Just recently, we have seen graffiti tags on signs on our HOA signage.

There are already two new devlopments on Cook Riolo and countless new developments on PFE and beyond. This entire area is feeling the crunch of two many people and cars on small roads. Adding another 92-138 high density, low income housing sounds like a nightmare and one we strongly oppose.

Please do not allow this development to move forward. I'm sure many who have lived here will consider leaving the area, including us.

James and Julianna Rice

LETTER 382: JAMES AND JULIANNA RICE

Response to Comment 382-1

Please see Master Response 1 — Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 383

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezone message
Date: Tuesday, March 19, 2024 10:57:01 AM
Attachments: Outlook-spu1hauj.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:07 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Rezone message

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: RICK RIEDMAN <riedmanranch@comcast.net>
Sent: Tuesday, March 5, 2024 7:19 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Rezone message

383-1

Supervisor Gore,
while I have read that you believe public notification was completed within all legal requirements. It would appear very few of the residents impacted were aware of it until after your February meeting. Even the sign posting was done in a manner that made it difficult to read while driving by. Whether intentional or not it has made this process seem clandestine.

With three of these properties within a mile of my home it almost feels punitive. As you know we live in a rural established neighborhood. One of the few rural areas that

383-1 Cont.

has maintained a high standard of living. Apartments have no place in a rural neighborhood with two lane country roads that have no sidewalks or shoulders. As I'm sure you are aware, we just had our 4th traffic related fatality in less than a year on Vineyard Rd. Adding hundreds of vehicles a day and the young families that would inhabit these apartments only comes to one conclusion. More people are going to die, probably children.

Riolo Vineyards and Placer Vineyards were both planned with no area zoned 20 to 30 homes per acre. I'm aware that there were areas that were overlayed and case law has made that insufficient. Rather than punish the Dry Creek and other rural communities throughout the county, doesn't it make more sense to revisit your plan that caused this problem. Perhaps you could rezone the commercial properties that were overlaid or change the 7 to 20 homes per acre to 20 to 30.

I would like to see who is paying a mitigation fee in lieu of low income housing. Because the rules have changed since these plans were developed. It makes more sense to go back to the developers and renegotiate their projects. They are not going to walk away. And even if they do, there are always more developers.

Should a single property owner be allowed to change an entire neighborhood? I don't believe so. I understand the county is working on a deadline. However, because the rules were changed by a court case you should have a valid reason for an extension.

Please don't destroy my neighborhood and home's value. If this is allowed to happen, what keeps other property owners from doing the same thing. Leaving the rest us to be stuck with acreage that is now close to worthless in a bad neighborhood. I'm anxious to hear your position on this.

Thank you,
Rick Riedman

LETTER 383: RICK RIEDMAN

Response to Comment 383-1

Please see Master Response 1 — Non-EIR/Administrative Issues, Master Response 2—Social and Economic Impacts, and Master Response 4—Traffic Safety.

Letter 384

From: charles riglick
To: Placer County Environmental Coordination Services
Subject: Opposition to Rezoning, area by Cavitt Junior High School
Date: Friday, March 8, 2024 11:52:50 AM

Dear Board of Supervisor's staff,

I am submitting this email/letter to show my opposition to the state mandated plan to rezone properties near Cavitt school in Granite Bay.

My wife and I have been residents in Granite Bay, now living in the same house for the past 29-1/2 years. We, and many other residents of this area have enjoyed a semi-rural lifestyle that has adequate fire and law enforcement services for an area the has limited crime and peaceful living. We do not want an inner city type congested and crime ridden area.

In the past few years, we have noticed an influx of residents from other parts of California, and that has increased our traffic conditions, but not too much in the way of " a criminal element" moving in. Most of the newer arrivals are working professionals and families. The Douglass Boulevard "corridor" fed by Auburn-Folsom road, is used by residents of North Folsom in Sacramento County. Adding an influx of vehicles concentrated in the Cavitt area off Auburn Folsom, would cause undue congestion for this area.

384-1

Our schools are known for giving a quality education to the students in our area. Most people want to keep that excellence. With a high density housing situation, especially a low income housing section of that tract would dilute the conditions available to provide our kids with a quality education.

Many residents that I have talked to in the real estate industry have stated that when an area has tracts with high density, low income housing, property values go down. Being bluntly honest, when people have worked hard and saved in order to move to a peaceful, nice environment. They do not want the inner city brought to their area.

If state officials want the "mandate" where high density/ low income housing should go, they should set an example and put it in an area where they live.

Sincerely,

Charles Riglick
Granite Bay Resident 29-1/2 years

LETTER 384: CHARLES RIGLICK

Response to Comment 384-1

Please see Master Response 1 — Non-EIR/Administrative Issues, Master Response 2 — Social and Economic Impacts, and Master Response 6 – Impacts to Local Schools. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 385

February 27, 2024

RECEIVED
MAR 13 2024
Community Development Resource Agency

To: Placer County
Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr., Ste 190
Auburn, CA 95603

From: Dry Creek Resident

Subject: Housing Needs Rezone Program

Placer County Planning Commission and Placer County Board of Supervisors:

The impact of this rezoning proposal to allow high density, low and very low income housing projects to be developed in Dry Creek would be a huge blow to our community's long established rural lifestyle. The County should have required the developers of projects in our area to include low income housing in their plans, but they didn't. Now they are asking us to pay the price for their mistake. The site off Cook-Riolo Rd (9-10) would cause damage to existing residents, strain resources, and increase traffic in our community. It should not be up to one homeowner to decide for the community if multifamily housing should be built in Dry Creek.

The Dry Creek/West Placer Community Plan was developed with the County, existing Dry Creek residents, and potential developers. Once adopted, it was expected that only compliant, *compatible* "rural infill" housing would be constructed that would not ruin the area's rural character, affect its riparian corridor, compromise the water quality and quantity of our wells, or disrupt drainage routes to filter rain runoff and allow groundwater to recharge. Based upon the Community Plan, Dry Creek residents have invested in improving the value of their homes, property and our rural community. They have made this their home because they welcome the escape from crowded urban living and they enjoy its rural ambience. High rise, multifamily housing would destroy this community and the security and sanctity of our rural lifestyle.

385-1 Obviously, a multi-unit apartment complex cannot magically be made inconspicuous or compatible with the existing rural homes and property, nor can it be seen as desired rural infill housing. The high density housing proposal for sites 9-10 in Dry Creek would add considerable and permanent noise and light pollution, as well as the construction noise that would adversely affect the quality of life and property values of residents who live directly adjacent to the project. Construction vehicle traffic and future residents would create a serious conflict with the existing traffic pattern and congestion already under strain from parents dropping off/picking up their children at the Creekview Ranch School which is located directly across the street from the proposed site.

The County says they need RM30, but in reality, the rezone does not require the sites to *actually* be built as low income, so this just seems like an excuse to push for more housing in Dry Creek without much oversight.

Typically, urban areas have high density housing and are more walkable with greater public transportation, while rural areas have low density housing. There are no buses, sidewalks or street lights in Dry Creek. This really is country living, so please don't destroy our lives just to meet a housing quota!

We respectfully request that the County select a different site where it will complement neighboring design goals and meet the needs of those future residents. We request Dry Creek be excluded and exempt from the rezoning program which would be extremely detrimental to this small country neighborhood.

Sincerely,

Christa Riolo

LETTER 385: CHRISTIAN RIOLO

Response to Comment 385-1

Please see Master Response 1 — Non-EIR/Administrative Issues, Master Response 2 — Social and Economic Impacts, and Master Response 4 – Traffic Safety. As discussed in Master Response 1, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) since congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers. In addition, potential impacts related to construction traffic are discussed in Chapter 8 of the Draft EIR. As discussed therein, implementation of Mitigation Measure 8-1, which would require that a construction traffic control plan be provided to the Engineering and Surveying Division for review and approval prior to the commencement of construction at any rezone site, would ensure impacts related to construction traffic would be reduced to a less than significant level.

Letter 386

From: Stacy Robinson
To: Placer County Environmental Coordination Services
Subject: Opposition Letter to Feb. Draft of HE1 DEIR
Date: Monday, March 18, 2024 5:04:47 PM

March 18, 2024

To the Placer County Planning Commission and Placer County Board of Supervisors,

I am writing today to express my opposition to the February 2, 2024 Draft Environmental Impact Report (DEIR) being utilized for the Housing Element Rezone (HE1).

After reviewing this document, it has become inherently clear that this plan and the most recent list of proposed sites were developed with little-to-no public input or comment in a last-ditch effort to meet state-level housing obligations after new developments in Placer were allowed to ignore or pay their way out of their high-density, low-income housing building requirements.

386-1

The DEIR is ambiguous and overly broad in that it lumps together all unincorporated parcels into one report; there is no detailed analysis of the environmental impact on each selected site. Given the vast range of area-specific flora, fauna, geography, etc., it seems incredible and inaccusable that the county would try to deploy a "one size fits all" approach.

Per CEQA Guidelines, "a public agency should not approve a project as proposed **if there are feasible alternatives** or **mitigation measures available** that would substantially lessen any significant effects that the project would have on the environment." From what the public could ascertain at the most recent County Board of Supervisors meetings, there are several other sites much more appropriate for high-density housing that the County has not considered (including 4242 Cincinnati Avenue, Rocklin)—indeed, 3 of the supervisors themselves seemed quite concerned and agitated that these sites were not included on the proposed list; to my knowledge, no effectual answer as to why they weren't has yet to be provided. Additionally, the DEIR does not include alternate locations for rezoning, nor the cumulative effects that the rezoning and corresponding growth would cause on the communities they exist in.

Sincerely,

Stacy Robinson

LETTER 386: STACY ROBINSON

Response to Comment 386-1

Please see Master Response 1 — Non-EIR/Administrative Issues, Master Response 2 — Social and Economic Impact, Master Response 3 – County-Owned Sites, and Master Response 5 — Programmatic EIR vs. Site-Specific EIR.

Letter 387

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: concerns about rezoning for low income
Date: Tuesday, March 19, 2024 10:57:05 AM
Attachments: Outlook-3u5mmfjp.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:08 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: concerns about rezoning for low income

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: linda rodriguez <lindar103sc@gmail.com>
Sent: Tuesday, March 5, 2024 8:07 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: concerns about rezoning for low income

387-1

I;m writing to express my concerns regarding the proposed rezoning.

My concerns are related to the infrastructure in the community. I haven't anything that describes what will be put in place for things such as sidewalks on the main road leading to these areas. Additionally nothing appears for transportation, e.g. public specifically. Who will be responsible for the upkeep of the lawn, gardening, trees, etc.

Regards, Linda

--
Linda Rodriguez
Lindar103sc@gmail.com

LETTER 387: LINDA RODRIGUEZ

Response to Comment 387-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 388

From: Melissa Roth
To: Placer County Environmental Coordination Services
Subject: Housing Element Sites Rezone | Placer County, CA.
Date: Sunday, March 17, 2024 5:17:06 PM

To whom it may concern,

I own the home on 3755 Old Auburn Road. My comments on this proposal are as follows:

1. Why don't you rezone all the homes in our area to the zoning you are proposing for the 5 acres behind my home? 90+ units seems excessive, but if you intend on approving it, why don't you rezone the adjacent lots as well?

388-1

2. Please bring the sewer to a closer proximity to our home, that we can tap into. Several of my neighbors are very interested in bringing sewer to our homes. However, the cost to do it is outrageous. We were quoted 150,000 just to build the road you are requiring and placing a hammerhead turn within the property. Very few of our neighbors can afford such a thing. Why don't you require these large projects to assist with that? It would be a win-win, because you will get the property lifetime of services to bill for those lots for sewer costs.

Thank you.

Melissa Roth
916-220-6435

LETTER 388: MELISSA ROTH

Response to Comment 388-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 389

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: EIR Lincoln Way, Auburn
Date: Tuesday, March 19, 2024 10:34:06 AM

-----Original Message-----
From: ivette rothenberg <ivetterothenberg@gmail.com>
Sent: Monday, March 18, 2024 7:10 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: EIR Lincoln Way, Auburn

389-1

The proposed re-zoning of this site is inappropriate to the location.

Lincoln Way is already narrow and busy at this location and with the addition of so many units will become untenable. Additionally, there are CA State Park lands nearby that would be impacted by noise, pollution and interruption to wildlife.

Please do not designate this site for such highly-populated development. Surely a more suitable site can be found in an easier to build and more appropriately placed location. Thank you.

With concern,
Ivette Rothenberg
Auburn, CA

LETTER 389: IVETTE ROTHENBERG

Response to Comment 389-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Responses to Comments 2-12, 2014, and 174-2.

Letter 390

From: Aaron Rudolph
To: Meghan Schwartz
Cc: Kally Kedinger-Cecil
Subject: Re: Housing Element Sites Rezone (PLN22-00476) DEIR
Date: Saturday, February 3, 2024 11:39:31 AM
Attachments: Image002.png

Hi Meghan -

390-1 Just checking why this draft EIR has sites that have been removed from the housing element (i.e. the ones along Penryn Road).

Thanks!

aaron

On Fri, Feb 2, 2024 at 1:37 PM Meghan Schwartz <MSchwartz@placer.ca.gov> wrote:

> The Draft Environmental Impact Report (DEIR) for the subject project has been released for public review from **February 2, 2024 thru March 18, 2024**.
>
> The Notice of Available of the Draft EIR is attached for your convenience, and you can view/download the DEIR at the link below:
>
> Housing Element Sites Rezone | Placer County, CA
>
> The Planning Commission will accept verbal comments on the DEIR at the following meeting:
>
> **Thursday, February 22, 2024**
>
> A public meeting will be held on February 22, 2024, to receive comments on the Draft EIR. Public comment will be offered in-person and virtually:
>
> - In-Person: Placer County Planning Commission, Planning Commission Hearing Room, Community Development Resource Center, 3091 County Center Drive, Auburn, California.
> - Virtually through a Zoom meeting webinar.
>
> The Placer County Planning Commission meeting will begin at 10:00 a.m.; however, the proposed project is not time certain. Please refer to the meeting agendas at the following link up to 1 week prior to the meetings for updated information:

https://www.placer.ca.gov/AgendaCenter/Planning-Commission-53

Meghan Schwartz, CDRA Technician

Community Development Resource Agency

3091 County Center Dr, Suite #190

Auburn, CA 95603

(530) 745-3075

mschwartz@placer.ca.gov

LETTER 390: AARON RUDOLPH

Response to Comment 390-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 391

From: Gayle Russell
To: Placer County Environmental Coordination Services
Subject: Housing Element Rezone
Date: Saturday, March 9, 2024 1:19:00 PM

391-1

I am writing to comment on the Draft EIR for the Housing Element Rezone.
The density proposed at 20 units minimum to 30 units maximum units per acre is not acceptable for any of these proposed lots that are not in a city. Anything that increases the density above what the current zoning allows should not be considered in rural, semi-rural or agricultural areas. It simply does not fit with what exists. All this will accomplish is urban sprawl. Don't do it!

Sincerely,
Gayle Russell
7325 English Colony Way
Penryn, CA 95663

P.S. By the way, adding 292 units to Penryn is definitely not acceptable and is a crazy idea.

Sent from Mail for Windows

LETTER 391: GAYLE RUSSELL

Response to Comment 391-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 392

Placer County Planning Department
3091 County Center Dr.
DeWitt Center
Auburn, CA 95603

Dear Placer County Planning Department:

I am writing in regard to your Draft EIR Housing Needs Rezone Program.

392-1 Question: What have you NOT been doing the last 30-40 years while approving subdivision/planned unit developments all over the county that have not taken into strong consideration the needs of low-moderate cost housing? NOTHING, but bowing down to the "wants" of developers/promoters to generate every dollar they can squeeze from monied buyers and NOT provide for the needs of low-moderate income families. You are at fault and are now up against a wall because the State could swoop in with mandates AND you have a stiff timeline to meet. Now you toss out a potential plan that hits Supervisory District 5 and the Auburn area exceptionally hard compared to the rest of the County.

392-2 I have lived in the Auburn area my whole life of 78 years and have watched poor planning decisions take place forever. I have been a long time active and vocal critic, as I have been attending Planning Commission and Board of Supervisor meetings with my family since I was 12 years old regarding a number of planning issues, the latest being the extension of the Hidden Falls Trail, including the parking lot on Bell Rd. Our neighborhood group, Protect Rural Placer worked hard to "educate" the decision makers of the problems that will create: wildfire that could potentially burn down 6,000 homes in the North Auburn area. Remember Paradise burned on Nov. 7th – we do get strong north winds in this prime fire danger area in the fall. Just ask all my neighbors who have lost their insurance. Plus, the roads are dangerous and will lead to the slaughter of drivers, passengers and also horses in trailers waiting to turn into the parking lot on Bell Rd. In addition, Cramer and Lone Star Rds. also have major problems that the Parks and Road Departments seem to not want to address, even with better signage. A motorcycle rider was killed on Bell Rd. near Burt Ln about 7:30 Saturday evening 3/16/2024 after he drifted off the road and a woman was killed in a single car accident on July 27, 2023 about 12:30 pm when she failed to negotiate the blind curve on Bell Rd. near the Dry Creek Bridge. Her car flew some 50 ft. across the creek, hit an oak tree, rolled and killed her.

392-3

392-4 You have chosen 3 sites : Numbers 65,66 and 61 (on your map) just off Hwy 49 and 67 and 68, also off Hwy 49, which I believe you need to eliminate. This is too rural an area for low-cost high density housing: Hwy 49 is already impacted, there is NO transportation and there is no sewer for 67 & 58. Where are these modest income people to work, go to school or how will they get there?

392-5 Sites 71 and 72 are equally bad, though are in town, where there is water and sewer, though there will be major problems. Lincoln Way – is a treacherous road and the site has a BAD blind curve. Two hundred plus apartments crammed onto the side of the American River Canyon is out of character for the single family/duplexes/small apartments already in the area. In addition, I would be extremely concerned about wildfire. There have been several fires in the canyon and just up Lincoln Way in the last 2-3 years that all had the potential to wipe out half or more of Auburn.

392-6 Please take your ill-thought out sites I have mentioned OFF the maps. There are sites with better access to transportation, support services, schools, etc. I am not opposed to housing for low-moderate income families, But these are just wrong.

Sincerely,

Delana Ruud

10800 Cramer Rd.

Auburn, CA 95603

LETTER 392: DELANA RUDD

Response to Comment 392-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 392-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 392-3
The proposed project does not include any sites on Cramer Road or Lone Star Road. Please see Master Response 4 – Traffic Safety.

Response to Comment 392-4
Please see Master Response 4 – Traffic Safety. Regarding sewer, if a development proposal is submitted, a Will-Serve letter is required from the serving agency. If the serving sewer agency determines capacity is insufficient, a capacity analysis would be required and if capacity is insufficient, projects would be required to construct improvements to ensure capacity.

Response to Comment 392-5
The proposed project does not include any site-specific development plans. While the proposed sites are in the unincorporated County, the roadway itself is owned, operated, and maintained by the City of Auburn. If development is proposed on sites 71 and/or 72, the proposed project would be reviewed in accordance with the City's roadway and encroachment standards. The project applicant would be required to provide engineering designs to meet applicable requirements, based on the size of the proposed project. The project applicant would be required to obtain an encroachment permit from the City of Auburn in order to construct an access point on Lincoln Way.

Response to Comment 392-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 393

From: Nick Sadek
To: Placer County Environmental Coordination Services
Subject: 3865 Old Auburn Road Roseville, CA 95661
Date: Monday, March 18, 2024 4:53:57 PM

To whom it may concern;

393-1 I would like to see more housing in Placer County, home prices have risen high and fast due to the lack of inventory. I believe that allowing property owners to be able to subdivide in a controlled process will make more homes available and increase the supply in our area.

Sincerely;

Nick Sadek
Granite Bay Resident.

--
Nick Sadek
Broker
DRE#00970410
Nick Sadek Sotheby's International Realty
9217 Sierra College Blvd Roseville, CA 95661
2601 Fair Oaks Blvd Sacramento CA 95864
Office: (916) 784-7444
Direct: (916) 966-4444
Fax: (916) 405-7444
www.NickSadekSIR.com

LETTER 393: NICK SADEK

Response to Comment 393-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 394

From: Farrukh Saeed
To: Placer County Environmental Coordination Services
Subject: 2022-079
Date: Monday, March 18, 2024 3:27:13 PM

Re: 3865 Old Auburn Road
Hello,

394-1 I am a local resident and I am writing to support the project application for the above referenced application. Our area does need availability for lower income families and this proposal will go long ways in meeting that requirement.

Thanks,
Farrukh Saeed
9668 Wexford Circle
Granite Bay CA 95746
775-544-5175 (Cell)

LETTER 394: FARRUKH SAEED

Response to Comment 394-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 395

March 8, 2024

Subject: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment TO RM-30

To whom it may concern,

395-1

I am so very disappointed and disheartened with your actions. To be able to affect a rural community so drastically and change the lives of so many individuals who have worked hard to afford a better life for themselves and their families is disgusting. My parents bought a one acre parcel on Carol Lane when I was in first grade. I felt so lucky to experience the freedom, adventures, safety, and privacy that life in countryside brought with it. My brother and his wife also worked hard to purchase land in the neighborhood, kitty corner to my parent's property, and have horses right in their backyard. They welcomed my little nephew last year and have the perfect quiet, rural lifestyle for their son to grow up in. I too hope to move back to the neighborhood with my husband and raise a family in the same way I grew up. But the city's actions are putting this at jeopardy. Please VOTE NO on rezoning Site 8. We need to keep the safety, privacy, and country lifestyle that this neighborhood was built on and that these families worked so hard for. This is unjust and wrong. Please do the right thing.

Thank you for your time.
Karly Sahr (Plarisan)

LETTER 395: KARLY SAHR

Response to Comment 395-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 396

February 12, 2024

To Whom It May Concern in Placer County Government:

Re: proposed rezoning of area along Baseline Road and East Drive in Western Placer County

I recently became aware of the plans for rezoning from one of my neighbors on Saturday, February 10th. She was circulating a petition against the high-density rezoning of an area along East Drive. I support her concerns and have signed the petition.



396-1

It appears that a map of Placer County was drawn identifying every parcel that might be available to be rezoned to meet some goal (HE-1 Rezone to Meet the Regional Housing Needs Allocation (RHNA)) to meet state funding requirement with no thought as to how this might affect the surrounding areas or if it made sense to place high density housing in this location.

My residence is near East Drive where potential high density housing parcels have been identified. Did you know these lots have had a minimum requirement of 1-2 acres per residence for well over 60 years? The intent was to keep a pastoral, rural existence.

High density housing will bring:

- More traffic. Baseline Road already has too much traffic.

- More accidents - The alignment of East Drive with Americana is already problematic since turning into each road requires sharing a middle turn-lane on Baseline Road.
- More noise, traffic, sirens, etc.
- Most likely more lights (obscuring the night star gazing)
- More crime which comes with low-income housing.
- A loss of our rural area, where children still ride horses and neighbors walk their dogs on the road since we don't have sidewalks.

In general, we need there to be advance planning and notification to existing residents of proposed zoning changes. It doesn't make sense to create a scattered map of possible sites with indiscriminate "tagging" of certain parcels to change their zoning without having the opportunity for them to be reviewed by local residents.

I hear a lot of platitudes from our elected officials that they came to Placer County and have raised their children in a certain environment that has fostered a sense of community and family. The claims are that they want to maintain the quality of life. Rezoning small parcels all over Placer County to be high density does not sound like maintaining our idyllic rural life and the area that I chose to live (I've been here for 42 years). What are the plans to service these high-density residents. It's like saying everyone should drive an EV vehicle without having the nfrastructure in place.

396-1 Cont

Let's slow down here and think about what we are trying to accomplish. High density housing with little up-front planning makes no sense. Don't rezone areas just to make it look like we have a plan. We can do better than this.

Pauline Sakai
sakaip@surewest.net

Why is a Rezone Program required?

Placer County's Housing Element program HE-1 is the Rezone to Meet the Regional Housing Needs Allocation (RHNA). Because the Housing Element did not identify sufficient sites to accommodate the RHNA across all income levels, state law requires the County to implement a rezone program to allow higher density residential development. Placer County is required to implement the programs identified in its Housing Element, and HE-1 must be implemented by May 15, 2024.

Failure to implement the Rezone Program could lead to the County losing its land use authority under Government Code Section 67555. If the County's land use authority were revoked, land use decisions would be made at the state level without local control or oversight. The County could also lose its recent Pro-Housing Designation and access to grant funding that supports local programs and initiatives.

LETTER 396: PAULINE SAKAI

Response to Comment 396-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

With respect to lighting concerns, page 21 of the Initial Study (Appendix A to the Draft EIR), notes that,

> Pursuant to Section 17.54.070(A)(2)(i) of the Placer County Code, all future development of the rezone sites would be subject to compliance with the applicable sections of the Placer County Design Guidelines related to light pollution, including, but not limited to, shielding of fixtures such that direct rays do not pass property lines. In addition, the Multifamily and Mixed Use Design Manual includes design guidelines for exterior lighting, such as DG-48, which requires that exterior light fixtures be mounted at the lowest appropriate height to reduce impacts on neighbors and to preserve natural settings and night sky views.

Notwithstanding, the IS includes Mitigation Measure I-1 to ensure that proposed lighting is Dark-Sky compliant as specified by the International Dark-Sky Association.

Letter 397

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: VLIH project/property map site 74
Date: Tuesday, February 20, 2024 9:14:32 AM

From: Rick Salaices <dananrick@hotmail.com>
Sent: Thursday, February 8, 2024 1:33 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: VLIH project/property map site 74

Hello,

397-1 My name is Rick Salaices. My wife and I reside in Sullivan Ranch development. 12415 Leeds Dr., Auburn, CA 95603. We would like to address the proposed development of the VLIH project. While we understand the need for housing we feel that this location is not appropriate. First of all the residents will have to walk down Bell Road which is a 55 mph road. This will be very dangerous. There is no public transportation available in this area as there is in other parts of Auburn such as the area where the Target store is located. There are not shopping or food sources in the immediate area and residents will have to travel some distance to access these resources. Also property values in this area will be negatively impacted. We look forward to attending the public meeting on February 13, 2024. Thank you for your consideration of this matter.

Respectfully,

Rick and Dana Salaices
Sent from Mail for Windows

LETTER 397: RICK AND DANA SALAICES

Response to Comment 397-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety.

Letter 398

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Dry Creek rezoning issue
Date: Tuesday, March 19, 2024 10:57:34 AM
Attachments: Outlook-kyimemo4.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:08 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Dry Creek rezoning issue

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: jlschell@gmail.com <jlschell@gmail.com>
Sent: Thursday, March 7, 2024 2:49 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Cc: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Dry Creek rezoning issue

398-1

Dear Supervisor Gore,
Please accept this email as our opposition to the proposed rezoning in District one which would allow low income high density multi story apartment units to be built in this area.

My wife and I are residents in the Morgan Creek Golfing community and have lived here since 2006. We purchased our home because of the open trails and wildlife around Morgan Creek, after reassuring ourselves that the surrounding area was consistent with the Morgan Creek community.

398-1 cont.

While we understand that low income housing is necessary there are surely other places in Placer county more suitable than in the area surrounding Morgan Creek. Please vote to not allow the rezoning effort which wouuld make this kind of housing available in this area.

Thank you,
John and Marie Schell
8963 Creekstone Circle
Roseville, CA 95747

LETTER 398: JOHN AND MARIE SCHELL

Response to Comment 398-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 399

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Comments for HCD on Placer County Housing Element Amendment
Date: Monday, March 11, 2024 10:12:55 AM

From: jlschell@gmail.com <jlschell@gmail.com>
Sent: Friday, March 8, 2024 3:33 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Cc: 'Marie Schell' <marie.a.schell@gmail.com>
Subject: Comments for HCD on Placer County Housing Element Amendment

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.
1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

399-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.
For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Thank you

John and Marie Schell
8963 Creekstone Circle
Roseville, CA 95747

LETTER 399: JOHN AND MARIE SCHELL

Response to Comment 399-1

Please see Responses to Comment Letter 62.

Letter 400

From: jay schiffman
To: Placer County Environmental Coordination Services
Subject: Fwd: Requesting EIR for project, 26
Date: Thursday, March 7, 2024 12:04:53 PM

Sent from my iPhone

Begin forwarded message:

From: jay schiffman <boboineu@icloud.com>
Date: 7 March 2024 at 11:59:39 GMT-8
To: planningcommission@placer.ca.gov
Subject: Requesting EIR for project, 26

400-1

Please, do not proceed without a proper and full environmental impact report on this property. It is a habitat refuge, including the creek as well as a major source of congestion which will be added to an already congested area. Pushing through a hasty approval is responsible to our community.

Thank you, jay schiffman.
Sent from my iPhone

LETTER 400: JAY SCHIFFMAN

Response to Comment 400-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. Regarding the creek portion of the comment, please see Response to Comment 52-2.

Letter 401

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Stop High Density Rezoning Sites 712 &72
Date: Wednesday, March 13, 2024 8:21:21 AM

From: Linda Schlais <schlaislinda@gmail.com>
Sent: Tuesday, March 12, 2024 6:22 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Board Clerk <BoardClerk@placer.ca.gov>
Subject: Stop High Density Rezoning Sites 712 &72

Richard and Linda Schlais
351 Huntley Ave.
Auburn, CA. 95603

Placer County Planning Department
3091 County Center Drive
Auburn, CA 95603
Mr. Chris Pahule Planning Director
cpahule@placer.ca.gov
Ms. Kally Kedinger-Cecil Senior Planner
kkedinge@placer.ca.gov

Dear Placer County Planning Department,

We are writing you regarding the potential high-density RM30 rezone of the following sites in the City of Auburn.

Site #71 – APN 054-290-064-000 - 85 LINCOLN WY AUBURN 95603 – 2.9 acres - 126,324 sq. ft.

Site #72 – APN 054-290-065-000 - 85 LINCOLN WY AUBURN 95603 – 4.5 acres - 196,020 sq. ft.

401-1

We are opposed to the high density RM30 rezoning for these properties just outside the Auburn City limits that Placer County is considering. We feel that this is a reckless, desperate attempt by Placer County to accommodate State mandated housing that should have been resolved within all the new subdivisions that the County approved. This area, in keeping with the rural character, of Auburn is currently developed as single-family residences with occasional small apartment complexes or duplex units that compliment Auburn's rural town character. We are not opposed to infill development but a density of approximately 200+ units in up to 3 story buildings on a meager seven acres is simply not compatible in the upper Lincoln Way neighborhood. A development of this proportion puts serious pressure on water and sewer services. It is likely that a new sewer pump station will be needed for the development.

The traffic whose only entrance and exit is on a blind curve with limited sight lines on Lincoln

401-1 cont.

Way is totally irresponsible. This curve has been the scene of automobile accidents -the most recent when a father and his son who were riding a motorcycle were hit head on by a motorist in their lane almost killing the father and seriously injuring his son.

The American River will suffer from pollution conveyed by a tributary of Canyon Creek on the property that flows directly into the popular Calcutta Falls and a recreational beach site on the American River. Neighborhood residents report that the property owners and the County have a cavalier attitude towards grading and erosion control at sites 71 and 72. No erosion control barriers to protect Canyon Creek were used when the property owners in their zealous effort to strip the property of vegetation and grade the property for development.

While we recognize the need for affordable housing and we are not against infill development in our city -this is extreme. If we wanted dense apartment complexes we would live elsewhere. How would you like to host such a massive dense development in your neighborhood?

We urge the County to consider other sites for RM30 zoning that do not have such a negative impact on the surrounding Auburn community neighborhoods.

Sincerely,

Richard and Linda Schlais

LETTER 401: RICHARD AND LINDA SCHLAIS

Response to Comment 401-1

Please see Responses to Comment Letter 346.

Letter 402

From:
To:
Subject: FW: Proposed Placer County Rezoning
Date: Tuesday, March 12, 2024 8:40:55 AM

From: Jeanne Schulz <jeannineschultzrealtor@gmail.com>
Sent: Monday, March 11, 2024 9:28 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Shanti Landon <SLandon@placer.ca.gov>; Jim Holmes <JHolmes@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; cindy-gustafson@placer.ca.gov; Planning Commission <planningcommission@placer.ca.gov>; Daniel Woodward <DWoodward@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>
Subject: Proposed Placer County Rezoning

402-1 I understand the obligation for Placer County to designate a certain number of locations for high density low income housing, but I strongly believe Property 26 is not suited for this purpose. I am very concerned that numerous red flags raised throughout the review process by concerned citizens have been ignored. I urge you not to accept these shortcomings when there are other locations that would not present these same challenges.

402-2 The record in this process is overflowing with concern that will, if not now, cause further challenges that will delay or prevent the underlying objective of adequate affordable housing from being fulfilled. Approval of a parcel that ultimately can't be developed due to environmental, safety, traffic, available public services and other material shortcomings will not serve the county or the community. The concerns being raised will not go away.

As others have repeatedly articulated and demonstrated, Property 26 include wetland vernal pools,has been declared a habitat for salmon, is immediately adjacent to Cavitt Junior High School, would have public access to Folsom Lake with unsupervised trails, no restrooms and lifeguards, and the Auburn Folsom Road corridor is already heavily impacted by traffic. Potentially adding 1000 or more occupants in this location is irresponsible. There will be adverse consequences to the environment, health and safety, unprepared infrastructure and the character of the community. Further, mitigation of these significant issues will be costly, will delay and may very well make the planned development of this property impossible.

402-3 I would like to recommend that you direct staff to return with three alternative parcels in District 4 for further consideration before making any decision. Otherwise, you will have simply passed the identified problems on to other agencies that will have to deal with them- passing the buck is not doing your job. Your responsibility is to look out for all communities in Placer County so that we may all continue to enjoy the benefits of living this special place. The only way to be sure and fulfill your fundamental obligations is to pass on Property 26 at this stage and continue your search for suitable properties on the road to adequate, affordable housing.

-

LETTER 402: JEANINE SCHULZ

Response to Comment 402-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 402-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

In addition, potential impacts to special-status species and habitat are addressed in Chapter 5, Biological Resources, of the Draft EIR. Please also see Responses to Comments 52-2 and 162-8.

Response to Comment 402-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 403

From: johnschwarzenberg3@gmail.com
To: Placer County Environmental Coordination Services
Subject: Housing Element Sites Rezone (PLN22-00476
Date: Tuesday, February 6, 2024 1:15:50 PM

Hello,

I have been reviewing the proposed sites for the above subject rezoning and development. I have residential rental property on Graeagle Lane and Sherwood Way so I have concerns about access to the proposed sites near Graeagle Lane.

403-1 Property map number 42, parcel number 076-420-064-000 is described as Graeagle and on the map it shows the North end of the parcel with frontage on to Graeagle Lane. What is the intended access to this parcel? I would strongly object to any access via Graeagle Lane. Such access would cause serious traffic congestion on Graeagle Lane, the Eastern part of Sherwood Way and Richardson Drive, through the Meadow View Estate, that would be unacceptable. These existing streets have not been designed for any increased traffic.

403-2 There appears to be an existing road from CA-49 to both map numbers 42 and 43 which should be adequate to service these two parcels. Is this the proposed access for these properties?

Kind regards,

John A. Schwarzenberg

John A. Schwarzenberg
530-903-1361

LETTER 403: JOHN A. SCHWARZENBERG

Response to Comment 403-1

The proposed project does not include any site-specific development plans, designs or proposals but the Draft EIR assumes future residential development on the rezone sites. As required by General Plan Policy 3.A.11, the County will require an analysis of the effects of traffic from all land development projects and each project must construct or fund improvements necessary to acknowledge the effects of traffic from the project. It should be noted that traffic congestion is no longer a CEQA transportation metric.

Response to Comment 403-2

Access will be a critical component for future development on the rezone sites. Once a specific development plan is proposed for one or both sites, all access alternatives will be considered. Nothing in the comment supports the need for new analysis or conclusions in the EIR.

Letter 404

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezone next to bayside church on sierra college
Date: Wednesday, March 6, 2024 9:32:12 AM

-----Original Message-----
From: David Schweickert <david@capitalcitysolar.com>
Sent: Wednesday, March 6, 2024 9:27 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Rezone next to bayside church on sierra college

404-1

Hello,
I've lived across from this parcel for 23 years. I have a company in placer county for 23 years. Don't make the mistake of reasoning this for low income housing. It will diminish our value and be a negative impact on our community. I moved here to be far away from low income housing. Thanks for your consideration. I live here and those are not my goals as well as our residents goals. Don't be WOKE!

David Schweickert Jr
Capital City Solar Electric
111 Derek Place
Roseville Ca 95678
(916)532-2011 mobile
(916)782-3333 office

LETTER 404: DAVID SCHWEICKERT

Response to Comment 404-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 405

From: rachael scott
To: Placer County Environmental Coordination Services
Subject: Concerned to rezone bell rd
Date: Friday, February 9, 2024 8:21:27 AM

Hello,

We live off of 12625 Princeton Dr in Auburn. We are very concerned about the proposed rezone.

We already have homeless and transients disrupting in our neighborhood and area. If low income and homeless housing were to happen I fear for my children's safety.

405-1

It would also negatively affect the property value we have built up.

We already have such a horrible problem near us. I can't even safely allow my kids to ride bikes down the road. A week ago there was a man touching himself exposed in front of dollar tree. Our area is becoming unsafe and this will only make the issue worse. Our household votes no for this rezone.

Thank You,

Rachael Scott

Sent from my really really ridiculously cool iPhone

LETTER 405: RACHAEL SCOTT

Response to Comment 405-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety.

Letter 406

From: dean shankland
To: Placer County Environmental Coordination Services
Cc: Ryan Haynes
Subject: Rebuttal and Disagreement with the DEIR for rezoning properties within Placer County
Date: Friday, March 15, 2024 2:30:48 PM

DATE: March 15, 2024

TO: Placer County Planning Commission

FROM: Dean Shankland
Vice-President
Morgan Greens, Home Owners Association

I am writing you to express my opposition to the February 2, 2024 Draft Environmental Impact Report (DIER) being utilized for the Housing Element Rezone (HE1).

THE DEIR IS NOT SPECIFIC TO DRY CREEK UNINCORPORATED AREA

406-1 The DEIR speaks to broad range areas and incorporates all ofPlacer Counties Unincorporated areas into one large pool. There is no way to show what impact the HE1 will have on the Dry Creek area when you incorporate it in with several other incorporated areas within Placer County.

THE DEIR IS NOT SPECIFIC TO EACH INDIVIDUAL SITE LOCATION

There are several sections within the DEIR that speak to all the proposed sites, but do not provide specific analysis to Sites 7-10.

THE DEIR DOES NOT ADDRESS ALL POINTS OF VIEW FOR ECONOMIC AND SOCIAL ISSUES

Per CEQA Guidelines, Section 15021, establishes a duty for public agencies to avoid or minimize environmental damage where feasible. A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment. In deciding whether changes in a project are feasible, an agency may consider specific economic, environmental, legal, social, and technological factors.

406-2 The DEIR does not address the negative impact rezoning Sites 7-10 from rural farm land to High Density, Low Income (RM30). The new zoning would significantly affect the surrounding landowners in their ability to farm, raise livestock, and burn green waste.

The DEIR does not capture the negative impact to social issues from the point of the current landowners. Being located to higher traffic, more noise and air pollution as well as long established families in the community interacting with apartment residents, who by nature are more transient, without ties to the community.

406-3 The County has other sites available to accomplish their goal. There are sites the County has not even considered, but are willing to participate in the rezoning (9640 Mirabelle Street, Roseville, CA 95747) and sites that are more suited for rezoning, but have not been vetted (4242 Cincinnati Avenue, Rocklin).

THE DEIR DOES NOT ADDRESS THE ALTERNATIVES, GROWTH INDUCING OR CUMULATIVE IMPACTS

406-4 There are sites the County has not even considered, but are willing to participate in the rezoning (9640 Mirabelle Street, Roseville, CA 95747) and sites that are more suited for rezoning, but have not been vetted (4242 Cincinnati Avenue, Rocklin).

The basic requirements for an DEIR include discussions of the environmental setting, environmental impacts, mitigation measures, alternatives, growth inducing impacts, and cumulative impacts. Nowhere within the DEIR did it discuss alternate locations for rezoning, the cause and effect of this growth and the cumulative effects that the rezoning would cause

THE DEIR WAS NOT AMENDED TO INCLUDE THE LATEST INFORMATION FOR PUBLIC REVIEW

406-5 The DEIR still includes 72 proposed sites, when this list has been revised. There is no amendment to the DEIR explaining this even though the information was available prior to the public review period.

DEIR ASSESSMENT REGARDING CONVERSION OF FARMLAND TO NON-AGRICULTURAL

406-6 Under the heading of Agricultural & Forest Resources (All Items): The DEIR wrote, "The majority of the rezone sites have been mapped by the Farmland Mapping and Monitoring Program, as Grazing Land, Urban and Built-Up Land, and Other Land. While Site #23 and Site #7 are designated as Farmland of Local Importance, none of the rezone sites are designated as Prime Farmland, Farmland of

Statewide Importance, or Unique Farmland. As such, development of the proposed project would not convert Farmland, as defined by CEQA, to non-agricultural use or involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use. Therefore, a less-than-significant impact would occur."

406-6 cont.

I disagree with this assessment in that this rezoning is specifically converting land zoned for Low Density/Agricultural to High Density/Low Income. By definition, this is significant impact to the neighbors, the community and the future residents of the site. The caviler discarding of the conversion our our precious rural environment is an insult.

DEIR ONLY TAKING INTO ACCOUNT SCENIC ASPECT FROM THE POINT OF VIEW OF A "HIGHWAY"

Under the heading Aesthetics (All Items): The DEIR wrote, " Federal and State agencies have not designated scenic vistas within Placer County for viewing and sightseeing. Similarly, Placer County, according to the Placer County General Plan, has determined that the Planning Area of the General Plan does not contain officially designated scenic highways, corridors, vistas, or viewing areas. Given that established scenic vistas are not located on or adjacent to the potential rezone sites, the proposed project would not have a substantial adverse effect on a scenic vista, and no impact would occur. According to the California Scenic Highway Mapping System, officially designated State Scenic Highways are not located within Placer County. Therefore, development of the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway, and a less-than-significant impact would occur."

406-7

I disagree as aesthetics are subjective. From the standpoint of an analyst completing this document that does not live in Dry Creek, they might not find rural farmland aesthetic. However, Aesthetics should be ascertained from the perspective of the residents of the area. What one person says is ugly, someone else might find beautiful. To only use a Federal or State agencies designation of a scenic vista or a California scenic highway mapping system as a cornerstone for your analysis, is flawed at best. Aesthetics are more than what you can view from a highway. Additionally, our community has roads and streets. With no highway, the DEIR is flawed in using such examples as they are "apples and oranges."

406-8

Just because the proposed project does not include any site-specific development plans, designs, or proposals, does not mean you can automatically label aesthetics as less that significant impact. The DEIR mentions multifamily dwelling as tall as 55 feet, but then said it would be up to Placer County to enforce measures with future developers. This is your definition of a mitigating factor? This should be labeled as significant unless statute limits the height of any structure on the site if the rezoning moves forward. Do not leave this item up to a board of elected officials and make it les than significant.

THE EIDR LACKS SPECIFICITY REGARDING HYDROLOGY AND WATER QUALITY

Under the heading Hydrology & Water Quality (All Items): The DEIR wrote, "A total of five groundwater basins are located within Placer County: the North American Subbasin of the Sacramento Valley Groundwater Basin (North American Subbasin) located within southwestern Placer County; and the Martis Valley Groundwater Basin (MVGB), the Olympic Valley Groundwater Basin, and Tahoe West and Tahoe North Subbasins of the Tahoe Valley Groundwater Basin located within eastern Placer County."

406-9

I oppose this section. This is overly non-specific and does not delineate the specific groundwater basin for the Dry Creek area and does not provide ample information for the reader to form an arguable objection. The EIDR need to provide specific information on what groundwater basin Dry Creek uses and what Groundwater Basin sites #7-10 would be obtaining their water from. During drought, the groundwater basins have less water. During these times contaminates can "creep" back upstream. Dry Creek, being located near decommissioned McClellan Air Force Base, where several wells have been shut down due to contamination, causes great concern whenever farmland is converted to High Density.

THE EIDR ONLY PROVIDES "IN FAVOR" COMMENTARY REGARDING LAND USE AND PLANNING

Under the heading Land Use & Planning (All Items): the EIDR paints a favorable picture of how all "rezone sites are located within existing urbanized areas of the County and are served by an extensive road network. In addition, many of the rezone sites are located adjacent, or in close proximity to, major arterial roadways."

406-10

I oppose this section. This is not site specific and draws the inference that all sites are to be treated the same in this respect. However, Dry Creek has two lane roads only for all of the proposed sites except one (East Avenue, which has a three lane road to the North). The community does not want these roads expanded or upgraded. This would reduce the feel of "small town." No sidewalks or streetlights gives the community a country feel and the residents like it that way. To nonchalantly say that all sites are services by an extensive road network is misleading. Additionally, to kick the issue down the road indicating the county can use the general plan methodology to widen roads and implement more satisfying infrastructure so traffic condition could be reduced, is missing the desires of the community and placing the landowners in a convenient one size fits all box.

Additionally, later in the DEIR report, the writer contradicts themself by stating, "The construction of new roadways is not anticipated to occur as a result of the proposed project"

THE DEIR PROVIDES STATISTICS THAT ARE NOT CITED FOR REFERENCE

Under the heading Population & Housing (All Items): The DEIR wrote, "The County is currently experiencing a housing shortage, especially in regard to a lack of both rental and ownership housing that is affordable to lower-income households, and, therefore, existing residents would likely take advantage of new housing opportunities within the County. Providing housing to existing residents would not add to the County's population, but rather, the proposed project would provide housing opportunities for the existing population within the County."

I disagree with this section. The writers of the DEIR indicated that Placer County is currently experiencing a housing shortage. This is based upon the County and there is no specificity to the Dry Creek community. You indicated that there would not be an increase in population as existing residents would move to the new housing opportunities within the County. Where did you get the information from. Please site the specific report where the information was obtained. This appears to be an opinion of the writer with no facts to support the conclusion. What the report should say is that the population of low income residents would increase as a result of projects being built on high density/low income sites. That is after all what the whole purpose of the rezoning effort is about.

406-11

What is specific to the Eastern part of the County does not work for the Western part. South Placers contains a bulk of the residents in Placer County. South West Placer sits adjacent to Sacramento County, who is experiencing a far worse housing crisis for low income families. It is apparent to all that a majority of Sacramento families would relocate to Placer County if affordable housing was created. Once again, the EIDR is a cookie cutter document without any specificity.

THE DEIR IS INACCURATE REGARDING PBLIC SERVICES

Under the heading Public Services (Items XV-2 through XV-6): The DEIR indicated that with the, "Increased property taxes associated with future residential development on rezone sites would contribute to County Public Safety funding, which can be used to offset increased demands placed on the PCSO as a result of increased population."

I disagree with this statement. The following are developments within Dry Creek community since 2004:

Morgan Creek (546 homes)
Morgan Greens (117 homes)
Morgan Ranch (379 homes)
Whispering Creek (19 homes)
Placer Vineyards (324 homes)
Riolo Vineyards Glen Willow (177 homes)
Brady Vineyards (119 homes)
Cabral Ranch (12 homes)
Riolo Vineyards Mason Trails (170 Homes)
Total 1863 homes

406-12

Double S Ranch (32 homes pending)
Sabre City (24 homes pending)
Silver Sage (132 Homes pending
Morgan Knolls (58 homes pending)
Total pending homes 246 homes

The Placer County Sheriff has not increased the patrol staff. The California Highway Patrol has not increased staffing in Dry Creek and the Fire House continues to have just two staff on duty at any given time.

406-13

Additionally, if these developers were made to comply with the mandate to create an allotment of affordable housing, we would not be in this situation. Instead they were allowed to pay a exemption fee (Except Sabre City which qualifies as affordable housing).

THE DEIR DOES NOT ADEQUATELY ADDRESS PUBLIC TRANSPORTATION

Under the heading Transportation (Item XVII-4): The DEIR wrote, "Section 17.54.060 of the Placer County Code provides parking space requirements by land use. Although the proposed project does not include any site-specific development plans, designs, or proposals, each individual future development project would be required to comply with the parking space requirements included in Section 17.54.060 of the Placer County Code. Therefore, the proposed project would not result in insufficient parking capacity on-site or off-site, and a less-than-significant impact would occur."

406-14

I disagree with this analysis. Low income residents, as the rezoning proposes, utilize public transportation. There are no designated public transportation routes within close proximity to Sites #9-10. However, since the EIDR is non specific to each community, the DEIR lacks specificity regarding this matter. For the record, Dry Creek does not want public transportation within our community. This would further detract from the rural environment the community covets.

406-15

THE EIDR LACKS SPECIFICITY REGARDING WHO BEARS THE COST OF A RISE IN THE USE OF UTILITIES

406-15 cont.

Under the heading Utilities & Service Systems (All Items): The DEIR indicated that the costs associated with providing utilities would be placed on the developers for connectivity and the consumer for usage.

I disagree with this assessment. The increase in population would cause the amount of available water to decrease. The State of California continues to be a a drought. Communities are already restricted to the amount of water they can use and penalized by rate increases if residents go over that amount. It is apparent that this is driven by population. Lower population results in more water to go around and the possibility of reduced rates to all.

When utility companies have additional residences to maintain, it results in the hiring of additional staff. These additional staff result in higher bills for everyone, not just the new residents of the multi-family dwellings. Therefore, the statements in the DEIR lack "the whole picture." Again, the DEIR lacks specificity to Dry Creek and only addresses Placer County as a whole. This does not provide the affected residents a clear picture of the environmental impact, which is what this report is meant to do.

406-16

Finally, if you notice the comments section of the report lacks participation by the Dry Creek Community. The county might have complied with the bear minimum communication requirements to convey the rezoning proposal to affected residents. However, it is quite obvious that District One staff have been less that genuine with the information. The sign located on lot #9 is misleading and makes it appear that the vacant lot the sign sits on is the actual location. Only after reviewing a site map, can you determine that is not the case. The residents located within close proximity to the proposed sites were not notified by mail until February 27, 2024.

Thank you for your attention to this matter and looking forward to future discussion.

Dean Shankland

LETTER 406: DEAN SHANKLAND

Response to Comment 406-1
Please see Master Response 5 – Programmatic vs. Site-Specific EIR.

Response to Comment 406-2
Please see Master Response 2 – Social and Environmental Impacts.

Response to Comment 406-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 406-4
Alternatives are discussed in Chapter 12, Alternatives Analysis, of the Draft EIR and cumulative/growth-inducing impacts in Chapter 11, Statutorily Required Sections, of the Draft EIR. The environmental setting is discussed in Chapter 3, Project Description, of the Draft EIR, and mitigation measures are identified in each Chapter. A summary of mitigation measures is provided in Chapter 2, Executive Summary, of the Draft EIR.

Response to Comment 406-5
Chapter 3, Project Description, of the Draft EIR states on page 3-5, "The ultimate list of sites to be rezoned is expected to contain fewer properties as County staff and the Placer County Board of Supervisors continues to refine the list."

Response to Comment 406-6
Section II, Agricultural & Forest Resources, of the Initial Study prepared for the proposed project states, "While the zoning designations on 17 of the proposed rezone sites allow for agricultural uses, only one site (Site #8) which is zoned RS-AG-B-20, is currently used for agricultural production, as the site is currently planted with row crops. However, the General Plan and the Dry Creek/West Placer Community Plans designated Site #8 as Low Density Residential (one to two dwelling units per acre). Therefore, the County has previously anticipated development of the site with non-agricultural uses. It should be noted that the use of Site #8 for other forms of commercial agriculture is limited by the on-site soil types, as indicated by the lack of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance."

Response to Comment 406-7
CEQA analysis as it relates to aesthetics is limited to public viewpoints. Aesthetics, Item 2, of the CEQA checklist requires analysis of projects to determine if a project would "substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, **within a state scenic highway**?" Item 2 requires analysis of projects to determine if a project would "In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (**Public views are those that are experienced from a publicly accessible vantage point**). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?" (Emphasis added).

Section I, Aesthetics, of the Initial Study prepared for the proposed project states, "Distinguishing between public and private views is important when evaluating changes to visual character or

quality, because private views are views from privately-owned land and are typically associated with individual viewers, including views from private residences. Public views are experiences by the collective public and include views of significant landscape features and along scenic roads. According to CEQA (PRC, § 2100 et seq.) case law, only public views, not private views, are protected under CEQA. For example, in *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal. App. 4th 720 [3 Cal. Rptr.2d 488], the court determined that "we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. As recognized by the court in *Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal. App. 3d 188 [129 Cal. Rptr. 739]: '[A]ll government activity has some direct or indirect adverse effect on some persons. The issue is not whether [the project] will adversely affect particular persons but whether [the project] will adversely affect the environment of persons in general.' Therefore, it is appropriate to focus the aesthetic impact analysis on potential impacts to public views" (Discussion Item I-3, page 20).

Analyzing potential viewpoints from public highways is consistent with CEQA requirements.

Response to Comment 406-8

The Draft EIR does not state that the absence of site-specific development proposals results in a less-than-significant impact to aesthetics. Section I Aesthetics, of the Initial Study prepared for the proposed project states, "Potential future development of residential structures up to 55 feet in height on these limited properties could alter the visual character or quality of the site(s); however, future development of the rezone sites would be subject to County review and compliance with the applicable development standards for the RM30 zoning district included in Chapter 17 of the Placer County Code…Furthermore, future residential development would be required to comply with applicable guidelines and regulations related to visual quality, including the Placer County Design Guidelines, the specific design guidelines contained in the relevant Community Plan for each site, and Article 17.54 of the Placer County Code. Compliance with such standards would reduce potential impacts to the visual character of the project area due to future development of the rezone sites, and would ensure that the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, a less-than-significant impact would occur" (Discussion Item I-3, page 21). This section also contains a footnote regarding height stating, "45 feet if adjacent to a single-family neighborhood. The Design Manual also includes a provision to allow an additional 10 feet in height if the roof is pitched and the portion of the roof over 25 feet in height is at least 25 feet away from the building site property lines." Future projects are subject to the height limitations described in the Design Manual.

Response to Comment 406-9

The commenter states the Draft EIR does not delineate the specific groundwater basin for the Dry Creek area and does not provide ample information for the reader to form an arguable objection.

Section X, Hydrology & Water Quality, of the Initial Study prepared for the proposed project states that the Rezone Sites located in the Dry Creek/West Placer area (Figure 3-1) are located in the North American Subbasin (NASb). The Initial Study further states, "the North American Subbasin is within the jurisdiction of the West Placer Groundwater Sustainability Agency (WPGSA), which was formed in 2017 as a partnership between Placer County, the cities of Roseville and Lincoln, the Placer County Water Agency, and the California American Water Company in order to comply with the requirements of the Sustainable Groundwater Management Act (SGMA). The goal of the WPGSA is to manage portions of the North American Subbasin by protecting against overdraft

and creating sustainable water supplies. According to the California Department of Water Resources (DWR), the North American Subbasin has been identified as a high-priority basin; however, the basin is not identified as being in a state of overdraft." Detailed information about the Subbasin can be found in California Department of Water Resources Bulletin 118. Following the passage of the Sustainable Groundwater Management Act, groundwater in the Subbasin is managed by five Groundwater Sustainability Agencies, including the West Placer Groundwater Sustainability Agency. The GSAs manage groundwater pursuant to the basinwide Groundwater Sustainability Plan (GSP), which also provides detailed information about the Subbasin. Current Subbasin conditions can be found in the GSP Annual Reports. As stated in the Initial Study, the North American Subbasin is not in a state of overdraft.

Detailed information about the Subbasin can be found in California Department of Water Resources Bulletin 118. Following the passage of the Sustainable Groundwater Management Act, groundwater in the Subbasin is managed by five Groundwater Sustainability Agencies, including the West Placer Groundwater Sustainability Agency. The GSAs manage groundwater pursuant to the basin wide Groundwater Sustainability Plan (GSP), which also provides detailed information about the Subbasin. Current Subbasin conditions can be found in the GSP Annual Reports.

Furthermore, Section X, Hydrology & Water Quality, of the Initial Study prepared for the proposed project states, "overall, a total of 17 rezone sites are underlain by groundwater basins, including 14 rezone sites which are located within the North American Subbasin (Sites #1 through #12, #23, and #29) and three sites which are located within the MVGB (Sites #44, #68, and #69), which are discussed in further detail below." The Initial Study further states that "potential future groundwater use within the North American Subbasin would be limited to the public water system which would serve Sites #11 and #12 in Sheridan. As discussed in Section XIX, Utilities & Service Systems, of the Initial Study, future development of Rezone Sites #11 and #12 could result in a maximum increase of up to 57 units within the North American Subbasin, and adequate groundwater supply is available to serve such future development." Therefore, Rezone Sites #7 through 10 would not be served by groundwater supplies.

The commenter expresses concern with groundwater contamination, noting that the Dry Creek area is near decommissioned McClellan Air Force Base, where several wells have been shut down due to contamination, causes great concern whenever farmland is converted to High Density. As noted above, the project proposes no groundwater use in the Dry Creek area.

Response to Comment 406-10

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 406-11

See Chapter 2, Housing Needs Assessment, of the Housing Element for a detailed discussion of the housing needs of Placer County including the shortfall of lower-income residential opportunities for residents of Placer County. Please also see Master Response 5 – Programmatic vs. Site-Specific EIR.

Response to Comment 406-12

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 406-13

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 406-14

The Draft EIR analysis does not assume that future project residents will primarily utilize public transportation. The comment also states that the Draft EIR lacks specificity regarding public transit, since the Draft EIR is not specific to the Dry Creek community. The Draft EIR was prepared to analyze the project's impacts at a programmatic level. The Draft EIR includes transit in Chapter 8, Transportation. More specifically, transit service is discussed in Section 8.2, Existing Environmental Setting, Section 8.3, Regulatory Context, and Section 8.4, Impacts and Mitigation Measures. Impact 8-2 analyzed whether the proposed project would conflict with an existing program, plan, ordinance or policy for the transit system. This impact was found to be less than significant.

Response to Comment 406-15

Utility costs are not an impact required to be analyzed under CEQA.

Response to Comment 406-16

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 407

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:20:17 AM

-----Original Message-----
From: dean shankland <dean.shankland@yahoo.com>
Sent: Friday, March 8, 2024 4:14 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: jesse.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

407-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Dean Shankland
916-622-3999
9261 Courtney Way

Roseville, CA 95747

LETTER 407: DEAN SHANKLAND

Response to Comment 407-1

Please see Responses to Comment Letter 62.

Letter 408

From: Ali Sharif
To: Placer County Environmental Coordination Services
Subject: DEIR 3865 Old Auburn rd
Date: Monday, March 18, 2024 4:19:26 PM

Dear board of supervisors,

408-1 I have lived in granite bay almost my entire life and attended granite bay high school. I would be extremely interested in purchasing a home near my family that is more affordable than the current options. Therefore I believe this parcel should be rezoned to provide the community with a lower priced new build home.

Thank you
Ali Sharif

LETTER 408: ALI SHARIF

Response to Comment 408-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 409

Opposition to VLIH

We bought our home in Sullivan Ranch 5 years ago and love this community.

Building 316 units on Bell Rd and New Airport Road will only serve to hinder the value of our homes, which we love. I am sure there are other areas that do not impact an entire community. The traffic that this will create is also of concern. New Airport Road is currently getting busier each year.

I understand this will include the homeless community. I sympathize with this particular community but including them in this VLIH endangers all of the residents in this family-related community. This is a fact that has been proven over and over again.

409-1 Gov. Newsom has driven so many out of CA, doing this will only promote more people to leave the state.

It is just as important to support our hard working community and what we lend to the area, paying taxes, working hard to provide for our families, maintaining our property, and volunteer work within our area. That has a value and needs to be supported.

I pray that you will reconsider this project and look for an area that better serves our entire community. This property is close to a church that serves many children and they need to be protected.

Thank you for considering my request.

LETTER 409: SHEWMON

Response to Comment 409-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 410

John and Wendy Shingle
389 Huntley Avenue
Auburn, CA 95603

RECEIVED
MAR 13 2024
CDRA - Planning

March 4, 2024

Members of the Board of Supervisors
County of Placer

RE: Rezoning parcels #71 & #72 – Lincoln Way, Auburn, CA

I am writing this letter as a formal opposition to rezoning of the referenced properties for so many reasons.

410-1 We have a nice quiet neighborhood here and as an aging senior citizen, I don't want to feel like I have to leave my home to find another beautiful quiet neighborhood.

410-2 While the current apartments across from us tend to get rowdy at times, they have mellowed a bit through the years. Sound travels easily across the canyon between our properties. We can hear people talking by their cars. We really hear it when there are people fighting & yelling at each other. Adding another 200 plus (or possibly 500 depending on how many units you allow) people will add to the issue of noise by an unbearable amount. We already have enough apartments in our area. It would be different if only a couple duplexes or 4-plexes were proposed.

410-3 My other objection is lighting – light pollution. The current apartments have flood lights on the back of the building – which face our property and illuminate our living room at night. Our bedroom faces the referenced properties. If they use the same type of lighting, put up 200 units (using the chart provided at the planning meeting) we will have daylight 24 hours a day. I prefer not to have to invest in blackout curtains and not have the option to open my windows at night in the summer.

410-4 The additional traffic on Lincoln Way is of concern as well. I use that section of road to commute to work each day. Adding that many more vehicles entering and exiting at that corner will adversely impact the traffic in this area.

410-5 Lastly, I am concerned about our stream at the bottom of our property. We have a variety of wildlife that reside in our backyard and along the stream. We already have issues with "kids" going down to explore the stream, coming onto our property, leaving behind trash, and creating possible fire hazards. Traffic around the stream frightens the wildlife. We want them to feel safe here.

410-6 We hope that you will take our concerns seriously and NOT rezone property #71 and #72.

W&Shingle

LETTER 410: JOHN SHINGLE

Response to Comment 410-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. It is also noted that the Draft EIR included a programmatic noise analysis that determined operational noise from multi-family development is limited in nature (e.g., site circulation and HVAC noise) and not anticipated to exceed the County's applicable noise thresholds, based on the modeling conducted for the Draft EIR. While noise may still be audible from such developments, that does not equate to a significant noise impact pursuant to CEQA if applicable thresholds are not exceeded.

Response to Comment 410-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 410-1.

Response to Comment 410-3

With respect to lighting concerns, page 21 of the Initial Study (Appendix A to the Draft EIR), notes that,

> Pursuant to Section 17.54.070(A)(2)(i) of the Placer County Code, all future development of the rezone sites would be subject to compliance with the applicable sections of the Placer County Design Guidelines related to light pollution, including, but not limited to, shielding of fixtures such that direct rays do not pass property lines. In addition, the Multifamily and Mixed Use Design Manual includes design guidelines for exterior lighting, such as DG-48, which requires that exterior light fixtures be mounted at the lowest appropriate height to reduce impacts on neighbors and to preserve natural settings and night sky views.

Notwithstanding, the IS includes Mitigation Measure I-1 to ensure that proposed lighting is Dark-Sky compliant as specified by the International Dark-Sky Association.

Response to Comment 410-4

Please see Master Response 4 – Traffic Safety and Responses to Comments 2-12 and 2-14.

Response to Comment 410-5

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 410-6

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 411

John and Wendy Shingle
389 Huntley Avenue
Auburn, CA 95603

March 4, 2024

Members of the Board of Supervisors
County of Placer

RE: Rezoning parcels #71 & #72 – Lincoln Way, Auburn, CA

I am writing this letter as a formal opposition to rezoning of the referenced properties for so many reasons.

411-1 We have a nice quiet neighborhood here and as an aging senior citizen, I don't want to feel like I have to leave my home to find another beautiful quiet neighborhood.

411-2 While the current apartments across from us tend to get rowdy at times, they have mellowed a bit through the years. Sound travels easily across the canyon between our properties. We can hear people talking by their cars. We really hear it when there are people fighting & yelling at each other. Adding another 200 plus (or possibly 500 depending on how many units you allow) people will add to the issue of noise by an unbearable amount. We already have enough apartments in our area. It would be different if only a couple duplexes or 4-plexes were proposed.

411-3 My other objection is lighting – light pollution. The current apartments have flood lights on the back of the building – which face our property and illuminate our living room at night. Our bedroom faces the referenced properties. If they use the same type of lighting, put up 200 units (using the chart provided at the planning meeting) we will have daylight 24 hours a day. I prefer not to have to invest in blackout curtains and not have the option to open my windows at night in the summer.

411-4 The additional traffic on Lincoln Way is of concern as well. I use that section of road to commute to work each day. Adding that many more vehicles entering and exiting at that corner will adversely impact the traffic in this area.

411-5 Lastly, I am concerned about our stream at the bottom of our property. We have a variety of wildlife that reside in our backyard and along the stream. We already have issues with "kids" going down to explore the stream, coming onto our property, leaving behind trash, and creating possible fire hazards. Traffic around the stream frightens the wildlife. We want them to feel safe here.

411-6 We hope that you will take our concerns seriously and NOT rezone property #71 and #72.

W Shingle

LETTER 411: JOHN SHINGLE

Response to Comment 411-1
Please see Response to Comment 410-1.

Response to Comment 411-2
Please see Response to Comment 410-2.

Response to Comment 411-3
Please see Response to Comment 410-3.

Response to Comment 411-4
Please see Response to Comment 410-4.

Response to Comment 411-5
Please see Response to Comment 410-5.

Response to Comment 411-6
Please see Response to Comment 410-6.

Letter 412

From: pshortt
To: Placer County Environmental Coordination Services
Cc: Mio* 6UJM947
Subject: Oppose three-story apartment complexes
Date: Friday, March 8, 2024 4:42:14 PM

412-1

This is a request for an EIR for "Project 26.

Also, I oppose any quick building of several story apartment complexes in lots that are tight in space, especially with limited parking availability.

Thank you for attending to my request and opposition.

Paula Shortt

Sent from my Verizon, Samsung Galaxy smartphone

LETTER 412: PAULA SHORTT

Response to Comment 412-1

Please see Master Response 4 – Traffic Safety and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 413

From: Farzana Shubarna
To: Placer County Environmental Coordination Services
Subject: Regarding re-zoning in Granite Bay
Date: Sunday, March 17, 2024 9:53:17 PM

Dear Sir/Maam,

413-1 I am a homeowner at 9042 Summit L, in Granite Bay at the Carnelian at Granite Bay homes located on Eureka and Auburn Folsom Boulevard. I am extremely opposed to the rezoning of the property that is close to my home, due to the fact that we already have extremely tight traffic conditions in this area, not to mention nearby schools that cause a significant amount of traffic during the school year. I am concerned that locating so many homes close to this intersection would result in an overwhelming amount of traffic and congestion. Further, the Granite Bay middle school very near by and there is no safe pedestrian walkway in and around my house. Since there will be no school bus arrangement, kids are already in very unsafe condition to walk to school. Rezoning will increase both number of kids trying to walk to school and more cars rushing overspending on the small single lane road. This would also pose a safety hazard for the students that are attempting to get to school via walking or biking, and also those trying to get to bus stops that are along Eureka Road. Unfortunately, there is really no option to widen the roads in this area because there is the state park right across the street. this has also been a discussion topic for my neighbors in this community and we are all strongly opposed to this change. We would definitely appreciate reconsideration of this proposal for the safety of the existing community, safety of school going kids, for reduction of pollution, and traffic congestion.

Many thanks,

Farzana Shubarna
9042 Summit Ln
Granite Bay
CA 95756

LETTER 413: FARZANA SHUBARNA

Response to Comment 413-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. The proposed project does not include any site-specific development plans, so the feasibility of the site access cannot be evaluated. Regardless, if the site develops the project applicant would be responsible for completing a transportation assessment, in compliance with the County's Transportation Study Guidelines. The Transportation Study would include a detailed analysis of the project's traffic generating characteristics and any effects of the project on the surrounding transportation network. The Transportation Study would address off-site transportation for all modes, including vehicles, pedestrians, and bicycles. If development is proposed on site 26, the proposed project would also be reviewed in accordance with the Placer County Land Development Manual for roadway and encroachment standards. The project applicant would be required to provide engineering designs to meet applicable requirements, based on the size and layout of the proposed project.

Letter 414

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: 2022-079 3865 Old Auburn Road, : Housing Needs Rezone Program Updates
Date: Tuesday, March 19, 2024 10:59:12 AM

From: Javed Siddiqui <Javed.Siddiqui@jtsengineering.com>
Sent: Monday, March 18, 2024 6:28 PM
To: Board Clerk <BoardClerk@placer.ca.gov>; 'PlacerCounty@public.govdelivery.com' <PlacerCounty@public.govdelivery.com>
Cc: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: RE: 2022-079 3865 Old Auburn Road, : Housing Needs Rezone Program Updates

To whom it may concern

We support the rezone program in the county's 2021-2029 Housing Element, a comprehensive plan aimed at addressing and accommodating Placer County's housing needs while ensuring equitable access to housing options. The county's Housing Element once adopted will accommodate a shortfall of land identified for multifamily residential development.

414-1

State law requires the County to implement a rezone program to allow higher density residential development. Placer County is required to implement the programs identified in its Housing Element, and HE-1 must be implemented.

Affordable housing is needed in Placer county where the land values have skyrocketed and housing opportunities for the workforce (Teachers, police, postal workers, Restaurant & store workers etc.) is lacking. Placer county has excellent schools and the workforce being unable to afford to live in Placer county .
Adopting the 2021-2029 Housing Element would be beneficial for the county.

Thank You.

Very Truly Yours,

Javed T. Siddiqui, P.E.
JTS Engineering Consultants, Inc.
1808 J Street
Sacramento, CA 95811-3010
Tel: (916) 441-6708
Fax: (916) 441-5336
Email: Javed.Siddiqui@JTSEngineering.com

CONFIDENTIALITY NOTICE: This email and any attachments may contain confidential and privileged information for the use of the designated recipients named above. If you are not the intended recipient, you are hereby notified that you have received this communication in error and that any review, disclosure, dissemination, distribution, printing or copying of it or its contents is prohibited. If you have received this communication in error, please destroy all copies of this communication and any attachments and notify us by email, phone or fax.

From: Placer County <PlacerCounty@public.govdelivery.com>
Date: January 23, 2024 at 4:23:05 PM PST
To: tariq@norcalihop.com
Subject: Housing Needs Rezone Program Updates
Reply-To: PlacerCounty@public.govdelivery.com

Hello,

This notice is to provide an announcement regarding an upcoming workshop scheduled for the Housing Needs Rezone Program on February 13, 2024 at 2:00 pm: Housing Element Rezone workshop moved up to Feb. 13 | Placer County, CA

Please also note that the Housing Needs Rezone webpage has also been updated to include upcoming hearing dates and staff reports from previous meetings.

If you have any additional questions, please contact Senior Planner Kally Kedinger-Cecil at kkedinge@placer.ca.gov and 530-745-3034.

If you would like to provide written comments for the Board workshop, comments can be sent to the above email address or to boardclerk@placer.ca.gov.

Update your subscriptions, modify your password or email address, or stop subscriptions at any time on your Subscriber Preferences Page. You will need to use your email address to log in. If you have questions or problems with the subscription service, please visit subscriberhelp.govdelivery.com.

This service is provided to you at no charge by Placer County.

This email was sent to tario@norcalhcp.com using GovDelivery Communications Cloud on behalf of: Placer County, California 175 Fulweiler Avenue · Auburn, CA 95603

LETTER 414: JAVED SIDDIQUI

Response to Comment 414-1

Please see Master Response 1– Non-EIR/Administrative Issues.

Letter 415

From: Riaz Siddiqui
To: Placer County Environmental Coordination Services
Subject: 3865 OLD AUBURN ROAD
Date: Monday, March 18, 2024 8:06:19 PM

To whom it may concern

415-1

We support the rezone program in the county's 2021-2029 Housing Element, a comprehensive plan aimed at addressing and accommodating Placer County's housing needs while ensuring equitable access to housing options. The county's Housing Element once adopted will accommodate a shortfall of land identified for multifamily residential development.

State law requires the County to implement a rezone program to allow higher density residential development. Placer County is required to implement the programs identified in its Housing Element, and HE-1 must be implemented.

Thank You

Riaz Siddiqui

7911 Indian Arrow Court

Orangevale CA 95662

LETTER 415: RIAZ SIDDIQUI

Response to Comment 415-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 416

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Concerns regarding the rezoning proposal of Dry Creek sites 7,8,9, & 10
Date: Tuesday, March 19, 2024 10:57:47 AM
Attachments: Outlook-x5ivh2tm.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:09 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Concerns regarding the rezoning proposal of Dry Creek sites 7,8,9, & 10

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: k s <karanjitsandhu@gmail.com>
Sent: Monday, March 11, 2024 4:22 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Concerns regarding the rezoning proposal of Dry Creek sites 7,8,9, & 10

416-1

Hello Robyn Dahlgren,

I hope this email finds you well.

I am writing to express my strong opposition to the proposed rezoning of the rural Dry Creek area for low-income housing development. As a resident of this community, I am deeply concerned about the potential negative impacts that such a

416-1 cont. ↑ rezoning decision would have on our cherished rural environment and the safety of our community.

416-2 The Dry Creek area is renowned for its scenic beauty, characterized by green fields, majestic trees, and abundant natural vegetation. It serves as a peaceful retreat from the hustle and bustle of urban life, offering residents and visitors alike the opportunity to enjoy the tranquility and serenity of nature. Rezoning this pristine rural area for housing development would irreversibly alter its character and destroy the very essence of what makes it so special.

416-3 Furthermore, I am deeply troubled by the potential consequences of introducing a low-income housing community into our area. While I am a proponent of affordable housing initiatives, I believe that the proposed location is highly inappropriate and ill-advised. Historically, low-income housing developments have been associated with elevated crime rates, which pose significant safety concerns for our community, particularly for the students attending Creekview Rand School located nearby.

416-4 The safety and well-being of our children must be our top priority, and rezoning the Dry Creek area for low-income housing development puts them at risk. The proximity of the proposed housing development to Creekview Rand School raises serious concerns about the safety of our students, as increased crime rates could jeopardize their security and peace of mind.

416-5 In conclusion, I urge the Placer County Board of Supervisors to reconsider the proposal to rezone the Dry Creek area for low-income housing development. Preserving our rural environment and ensuring the safety of our community, especially our children, should be paramount in any decision-making process. I implore you to listen to the voices of concerned residents like myself and uphold the integrity of our beloved Dry Creek area.

Thank you for considering my concerns.

--
Best Regards,
Karan Singh

LETTER 416: KAREN SINGH

Response to Comment 416-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 416-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 416-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 416-4
Please see Master Response 1 – Non-EIR/Administrative Issues. The comment enters into speculation, suggesting that low-income housing would pose a safety risk to children. It is not possible to ascertain accurately whether and to what extent low-income residents would conduct illegal activities. Pursuant to CEQA Guidelines Section 15145, "If, 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."

Response to Comment 416-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 417

To: Placer County
Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr., Ste 190
Auburn, CA 95603

From: Dry Creek resident(s)

February 22, 2024

Subject: Housing Needs Rezone Program

Placer County Planning Commission, Placer County Board of Supervisors:

417-1 The impact of this rezoning proposal to allow high density, low and very low income housing projects to be developed in Dry Creek would be a huge blow to our community's long established rural lifestyle. The site off Cook-Riolo Rd (9-10) would be a mistake, and would cause damage to existing residents, strain resources, and increase traffic in our community. It's unfair that one homeowner can decide the fate of our rural landscape.

417-2 The Dry Creek / West Placer Community Plan was developed after many meetings between the County, existing Dry Creek residents, and potential developers. Once adopted, it was expected that only compliant, *compatible* "rural infill" housing would be constructed in our unique Dry Creek community which would not ruin the area's rural character, affect its riparian corridor, compromise the water quality and quantity of our wells, or disrupt drainage routes to filter rain runoff and allow groundwater to recharge. Based upon the Community Plan, Dry Creek residents have invested in improving the value of their homes and property and in building the value of our rural community and its unique attributes. Established residents have made this their home because they welcome the respite from crowded urban living and they enjoy its rural ambience. High rise, multifamily housing would destroy this community and the security and sanctity of our rural lifestyle.

417-3 Obviously, a multi-unit apartment complex cannot magically be made inconspicuous or compatible with the existing rural homes and property, nor can it be seen as desired rural infill housing. The high density housing proposal for sites 9-10 in Dry Creek would add considerable noise and light pollution, as well as the construction noise that would adversely affect the quality of life and property values of residents who live directly adjacent to the project. Construction vehicle traffic and future residents would create a serious conflict with the existing traffic pattern and congestion already under strain from parents dropping off/picking up their children at the Creekview Ranch School which is located directly across the street from the proposed site.

417-4 Placer County can meet the housing requirements by designating sites within existing city development, or other areas like The Placer Vineyards project or other undeveloped land that would not affect a rural community with well-established homes. Typically, urban areas have high density buildings and tend to be more walkable, with greater public transportation, while rural areas have low density housing. There are no markets, public transportation, medical/ health services, food banks, or clothing stores available in Dry Creek. Placing high density housing near similarly high density zoning makes more sense. This really is country living, so locating the rezone projects near services or resources low income residents might need and could gain access to more easily would better serve the future occupants. Please don't destroy our lives just to meet a housing quota.

4175 Our objections to this proposed rezoning are valid and consistent with the Dry Creek Community's decades long, ongoing public comment participation to preserve Dry Creek. We request Dry Creek be excluded and exempt from the rezoning program which would be extremely detrimental to this small country neighborhood.

Sincerely, Terri Skondin

LETTER 417: TERRI SKONDIN

Response to Comment 417-1

Please see Master Response 1 – Non EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 417-2

Please see Master Response 1 – Non EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety.

Response to Comment 417-3

Please see Master Response 1 – Non EIR/Administrative Issues, Master Response 4 – Traffic Safety. In addition, potential impacts related to construction traffic are discussed in Chapter 8 of the Draft EIR. As discussed therein, with implementation of Mitigation Measure 8-1, which would require that a construction traffic control plan be provided to the Engineering and Surveying Division for review and approval prior to the commencement of construction at any rezone site, would ensure impacts related to construction traffic would be reduced to a less than significant level. Furthermore, impacts related to noise, including construction noise, are discussed in Chapter 7 of the Draft EIR. Impacts associated with light pollution are discussed in Section I, Aesthetics, of the Initial Study prepared for the proposed project (see Appendix A of the Draft EIR).

Response to Comment 417-4

Please see Master Response 1 – Non EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 417-5

Please see Master Response 1 – Non EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 418

From: Lora Slade
To: Bonnie Gore; Shanti Landon; Jim Holmes; Suzanne Jones; Cindy Gustafson; Placer County Environmental Coordination Services; Planning Commission
Subject: Request from one of the MANY tax paying placer county residents
Date: Saturday, March 9, 2024 2:18:34 PM

418-1

I am a paying property tax resident of Placer County. I am writing to request that property number 26, located at 8989 Auburn Folsom Road be completely removed from the rezoning list and not considered for a proposed apartment building location. This land is home to an abundance of nature and animals, the site was originally established as a serenity spot for the area. IF a continuation of the rezoning of this location continues then a proper EIR must be done- the programmatic EIR will not suffice. It is habitat to many animals and Linda Creek runs through it. This particular property should not have even been on the list of rezoning because it's supposed to be 10 acres or less to qualify. The county has it at 18.1 acres and with drainage and setback it's still 12.3 acres, but that's still over the limit. Are placer county employees, people entrusted by the tax payers of this county, going to do actions that are not technically suppose to be done? Will the taxpayers, over 1000's at this time, going to have to force our county officials to follow rules that said same officials fine, and insist, that the tax payers follow? People are highly fed up with this kind of behavior from those that are required to instill, and regulate, that ALL county residents. and companies, follow the rules as outlined.

DO WHAT'S RIGHT...NOT JUST BECAUSE SOMEONE'S POCKETBOOK PAID TO OVERIDE THE RULES.

LETTER 418: LORA SLADE

Response to Comment 418-1

Please see Master Response 4 – Traffic Safety and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. Regarding Linda Creek concerns, please see Response to Comment 52-2.

Letter 419

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: NO REZONING IN OUR AREA OF DRY CREEK
Date: Tuesday, March 19, 2024 10:56:38 AM
Attachments: Outlook-us0i152v.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:07 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: NO REZONING IN OUR AREA OF DRY CREEK

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Mona Sousou <mona@sousoumail.com>
Sent: Tuesday, March 5, 2024 7:00 AM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Re: NO REZONING IN OUR AREA OF DRY CREEK

Dear Members of the Planning Department,

419-1

I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

419-1 cont.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that the Planning Department consider alternative solutions that meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning.

Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely, Mona

On Sun, Mar 3, 2024 at 7:14 AM Mona Sousou <mona@sousoumail.com> wrote:

419-2

> Dear Supervisor and Planning Commission Representative - PLEASE NO

419-2 cont.

REZONING IN OUR AREA OF DRY CREEK SITES OF 7,8,9,10. WE DO NOT WANT HIGH DENSITY, LOW INCOME HOUSING, PERIOD.

THANK YOU,

Mona
650.766.3377

--
Thank you,
Mona
650.766.3377

LETTER 419: MONA SOUSOU

Response to Comment 419-1

Please see Responses to Comments 115-1 through 115-7.

Response to Comment 419-2

Please see Responses to Comments 115-1 through 115-7.

Letter 420

From: Dr. Sara Spencer
To: Placer County Environmental Coordination Services
Subject: Rezone Opposition - Parcels 9 and 10 - Creekview Ranch Elementary School
Date: Monday, March 18, 2024 4:15:10 PM

I am writing this letter in opposition of the rezone project for parcels 9 and 10 directly across the street from Creekview Ranch Elementary School. My daughter, Olivia is a current transitional kindergarten (TK) student at Creekview And we have hopes of her staying at this wonderful school through 8th grade. Very low income housing is developed directly across the street from the school. We will have no choice but to leave the school we have come to love in a very short time in the interest of safety. I was recently elected president of the Creekview Ranch PTA for the 2024 to 2025 school year.

420-1

The natural incident of high turnover of apartment residence and the lack of control over potential roommates and other houseguests in addition to legal renters, leaves me with great concern over the health and safety of over 800 students just a throw away. What would keep residence of a very low income housing project from entering campus, engaging in vandalism, perpetrating against our children.

While my first argument and opposition of this development has to do with the health and safety of children, the project itself also just doesn't make sense in this area. Cool Riolo Road is a small, 2 Lane country road without sidewalks, bus, lines, street lights, and cannot withstand the addition of hundreds of more cars traveling the road especially considering all the other single family home development in the area that will already be bringing an influx of traffic to our area.

420-2

This development would be irresponsible of the county to move forward with. There are new apartment buildings on Washington at Main Street and Church Street. Can these be converted to low income housing to meet the requirement? It would be a much more appropriate location considering the soup kitchen, access to public transportation, walking distance to stores and other facilities.

Otherwise, there is also still so much open land in Placer County and California in general. Please work to identify land available in new community options rather than invading existing communities.

420-3

Thank you,
Sara Spencer

Sara Spencer PhD, LPC, BC-TMH
Certified Autism Specialist
916-752-4832
LinkedIn

LETTER 420: SARA SPENSER

Response to Comment 420-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 420-2
Please see Master Response 4 – Traffic Safety.

Response to Comment 420-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 421

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HE-1 Major Issue -- 8989 Auburn Folsom Rd, Granite Bay
Date: Tuesday, February 20, 2024 9:16:44 AM

From: Cristen Andrews <c10andrews@gmail.com>
Sent: Saturday, February 10, 2024 3:06 PM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Darren Spicer <dspicer0425@gmail.com>
Subject: HE-1 Major Issue -- 8989 Auburn Folsom Rd, Granite Bay

Dear Board of Supervisors and Sr Planner Kally,

I'm writing to you today about the proposed Housing Element Program.

This program currently designates that the 17 acre property on the corner of **Fuller Drive and Auburn Folsom Road (8989 Auburn Folsom Road)** be
rezoned from commercial use to a newly created zoning element, which establishes a maximum of 30 units per acre (510 units total).

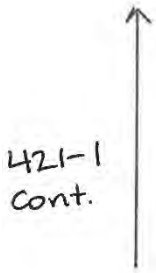
As a citizen of Granite Bay living directly across the street from this proposal, as well as someone who has children in the local school system, I'd like to share grave concerns about this proposal, and why I do not think it is in the best interest of Granite Bay or Placer County:

421-1

a) The program requires the units to be either 'low income' or 'very low income' as defined by the California Department of Housing and Community Development. Placing this type of housing to share a border with Cavitt Jr High is **incredibly dangerous to the well being of students** and faculty at Cavitt. Without a doubt, the school district safety (and educational grade) would shift dramatically in a negative way if this were allowed to move forward. This is highly irresponsible to consider for this reason alone.

b) Theft and crime would all but be assured to increase. Placing 'very low income' housing in the center of an affluent area is a recipe for disaster on both sides of the coin, and certainly wouldn't lead to a cohesive community.

c) A quick look at the surrounding area will highlight how out of place housing such as this would be, and the assured friction that would occur between local residents and new tenants of said low-income housing. Concerns around residents of this proposed project being able to afford the cost-of-living in Granite Bay would likely lead to further animosity and challenges.



Board of Supervisors and Sr Planner Kally, I ask that you strongly assist in preventing this development from moving forward, for the safety and well-being of all parties involved.

Thank you for your time and consideration.

Best,
Cristen & Darren Spicer

421-1 Cont.

LETTER 421: CRISTEN AND DARREN SPICER

Response to Comment 421-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment enters into speculation, suggesting that low-income housing would pose a safety risk to children. It is not possible to ascertain accurately whether and to what extent low-income residents would conduct illegal activities. Pursuant to CEQA Guidelines Section 15145, "If, 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."

Letter 422

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HE-1 Site 26 – MAJOR Issue (Granite Bay)
Date: Wednesday, March 13, 2024 8:22:51 AM

From: Darren Spicer <dspicer0425@gmail.com>
Sent: Wednesday, March 13, 2024 1:09 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: c10andrews@gmail.com
Subject: HE-1 Site 26 -- MAJOR Issue (Granite Bay)

Dear Kally,

I'm writing to you today about the proposed Housing Element Program (HE-1), and more specifically the Draft EIR, which lists Site #26 in Granite Bay as a top choice to place hundreds of 'low income' & 'very low income' multi-family housing. https://www.placer.ca.gov/DocumentCenter/View/77692/Housing-Element-Appendix-F?bidId=).
This site is 17 acres on the corner of Fuller Drive and Auburn Folsom Road (8989 Auburn Folsom Road).

422-1 **Respectfully, for the safety of ALL current and future citizens in Granite Bay and Placer County, this site needs to be REMOVED from the candidate list immediately.**

As a citizen of Granite Bay living directly across the street from this proposal, as well as someone who has children in the local school system, I'd like to share grave concerns about this proposal, and why the entire community of Granite Bay does not think this is in the best interest of anyone in Placer County:

#1 SAFETY

422-2 a) **Placing 'very low income' housing bordering a SCHOOL is incredibly reckless and will absolutely lead to an increase in crime.** It appears there is no consideration for the safety and well-being of the children who attend Cavitt Middle School.

422-3 **b) An increase in crime** and deterioration of Cavitt will undoubtedly lead to a downgrade in the school's ranking as well.

422-4 c) Auburn-Folsom Rd functions like a highway, with cars easily going 60-70mph on a regular basis. Where are the kids who would live in this proposed development going to play? The answer is on and around Auburn-Folsom, and **you will sadly see an increase in fatalities along the corridor, many of whom likely will be children.** This again is beyond reckless.

422-5 **#2 LACK OF INFRASTRUCTURE**

a) **Auburn-Folsom Rd is not equipped to handle the additional presence of**

422-5 cont.

hundreds of cars a day at the intersection with Fuller Drive. What is already jammed every single morning will turn into utter chaos, which will then require additional law enforcement resources that the county simply does not possess.

422-6

b) **We do not have the proper resources to handle adding hundreds of residents at Site #26.** There's no close access to hospitals & other essential needs, & adding 'very low income' housing into an area already stretched thin is not setting up anyone for success, but rather is penalizing everyone. It doesn't support the citizens of Granite Bay.

422-7

c) There is no Public Transportation locally available to accommodate this. How are 'very low income' residents expected to commute/find reliable transportation, and to what jobs are they commuting to? The local area does not have a surplus of jobs.

#3 ENVIRONMENTALLY IRRESPONSIBLE & POTENTIALLY UNLAWFUL

422-8

a) Multiple protected species, including the Golden Eagle, utilize this parcel of land. We are also of the belief that the proper environmental studies were not conducted. CDFW has been informed of this.

422-9

b) Linda Creek (which would be severely impacted by this project) is home to protected salmon that swim upstream to spawn.

422-10

c) The state's VERY OWN CRITERIA specifically notes that the housing program is not intended for larger sites in excess of 10 acres. This isn't even close even with adding in a buffer zone around the creek.

422-11

Kally, I respectfully ask that you move to join Supervisor Jones and eliminate Site #26 from the list of candidate sites.
Please do the right thing by the very people you were elected to serve. We will pursue this from every angle possible, including legal action if required, to ensure that OUR community is safe.

Thank you for your time and consideration.

Sincerely,

Darren Spicer
669-800-9172
dspicer0425@gmail.com

LETTER 422: DARREN SPICER

Response to Comment 422-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 422-2
Please see Master Response 1 – Non-EIR/Administrative Issues. The comment enters into speculation, suggesting that low-income housing would pose a safety risk to children. It is not possible to ascertain accurately whether and to what extent low-income residents would conduct illegal activities. Pursuant to CEQA Guidelines Section 15145, "If, 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."

Response to Comment 422-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 422-2.

Response to Comment 422-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 422-5
Please see Response to Comment 422-4.

Response to Comment 422-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 422-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 422-8
As detailed in the Biological Resources Assessment (BRA) (included within the Draft EIR as Appendix G), the biological resources analysis was conducted at a programmatic level. As a result, Madrone stated at the beginning of Section 6.0 – Mitigation for Potential Impacts to Sensitive Biological Resources – that:

> All parcels must comply with Mitigation Measure 6.1.1 below. Additional required mitigation measures will be based on which sensitive biological resources (including aquatic resources and special-status species) are documented within the parcel, or have the potential to occur within the parcel. We have provided a summary of the sensitive biological

resources that may be present and mitigation measures for impacts to those resources for each parcel in Attachments C and D, but a final list will be developed as part of Mitigation Measure 6.1.1.

In Attachment C, Madrone presented a preliminary list of 23 special-status species that may have the potential to utilize the site; however, if a project is ultimately proposed within this parcel, this list would be refined during implementation of Mitigation Measure 6.1.1 – Site Survey and Biological Resources Inventory. The potential for golden eagle to utilize the site for foraging or nesting is extremely low (due to the relatively small grassland patch size), and as such it is not listed in Attachment C of the BRA. However, this does not preclude the species from flying over the site or perching on-site in transit between more suitable habitat patches. The comment letter states that "golden eagle utilize this parcel of land"; however, no evidence to support this assertion is provided. A search of both the eBird database and iNaturalist reveal only three records of golden eagle in the vicinity of the site (all on eBird), none of which are on-site, and none of which indicate any use of the location, but may all be birds soaring past. Furthermore, the only golden eagle nest in the greater vicinity on iNaturalist is a nest in the vicinity of El Dorado Hills that is known to the authors, and is located in an expansive grassland (which, as Madrone indicates in the BRA, is suitable habitat for this species, and is not present within Site #26).

Response to Comment 422-9

BRA Attachment C includes two species of "protected salmon" on the list of "Special-Status Species with Potential to Occur" for Parcel #26: Steelhead – Central Valley Distinct Population Segment (DPS) and Chinook salmon – Central Valley fall-run. Therefore, the document acknowledges that salmonids may utilize Linda Creek within Parcel #26. However, there is no existing development plan for Parcel #26, so it is unclear how the commenter was able to determine that the creek would be severely impacted by this project. Furthermore, as noted in Attachment C, any work within this parcel would be required to comply with the Placer County Conservation Plan's (PCCP's) Stream System Condition 1 (which mandates avoidance of the Stream System except for very specific uses that are specific to the stream zone) and Species Condition 7: Salmonids, which has specific measures for work in and adjacent to salmonid streams. These measures have already been approved by the National Marine Fisheries Service (NMFS) through the approval of the PCCP. As shown in Attachment E of the BRA, the Stream System includes a 100-foot setback from Linda Creek.

Response to Comment 422-10

Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 422-9.

Response to Comment 422-11

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 423

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element Amendment Available for Public Review
Date: Monday, March 4, 2024 8:49:02 AM
Attachments: image001.png

From: Darren Spicer <dspicer0425@gmail.com>
Sent: Monday, March 4, 2024 1:24 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: c10andrews@gmail.com; John Greenwood <jsg3010@gmail.com>; Tinker, James (ETHUS) <jtinker@its.jnj.com>; kgross@bonneville.com; Dan Howell <danhowell13@gmail.com>; Darren Spicer <dspicer0425@gmail.com>
Subject: Re: Housing Element Amendment Available for Public Review

Hi Kally,

423-1

Just to make sure I'm digesting the info shared (more specifically right here https://www.placer.ca.gov/DocumentCenter/View/77692/Housing-Element-Appendix-F?bidId=), it seems that public and direct local resident input has been largely ignored. Rather, the county has scored the site in question (Granite Bay, site 26) as their TOP priority (score of 77), and then also offered a list of additional incentives to developers to basically rush the project across the finish line.

What I can't figure out is despite the clear environmental, safety, and traffic concerns, many of which were voiced at the 2/13 hearing, the county appears to simply be ignoring the very residents it was elected to serve and look out for, and continue pushing it's objective to not have a massive low-income housing deficit like it did in the last reporting period. Am I potentially missing anything here? (This is a genuine question).

What is the next hearing date where the public can (again) attempt to share explicit reasons as to why this is going to ruin part of Granite Bay?

Sincerely,
Darren

On Fri, Mar 1, 2024 at 12:15 PM Kally Kedinger-Cecil <KKedinge@placer.ca.gov> wrote:

> Hello,
>
> This email is to inform you of the availability of the Housing Element Amendment for a seven-day public review period. The amendment has been compiled to address changes that have occurred since adoption in 2021 including the revisions to the Regional Housing Needs Allocation (RHNA) shortfall, the change in approach for accommodating the shortfall (from relying on an overly to now completing a

rezone), and the modifications to the Housing Element Residential Land Inventory which includes the addition of nine new sites that were not previously identified in the adopted Housing Element. The public review period is beginning today (March 1, 2024) and closes on **March 7, 2024**. Following the public review period, the amendment and any comments received will be provided to the California Department of Housing and Community Development (HCD) for a 60-day review period. The amendment will be included with the report package for the Board of Supervisors meeting for a final action in May. The amendment and the appendix are available on the Housing Element webpage. In addition to this email notice and the posting on the Housing Element webpage, a notice regarding the amendment is being posted on the County's main webpage, the Housing Needs Rezone Program webpage, and social media.

Comments on the Housing Element Amendment can be submitted to Senior Planner Kally Kedinger-Cecil at kkedinge@placer.ca.gov or submitted in writing to:

Placer County Community Development Resource Agency
Planning Services Division
3091 County Center Dr., Ste. 190
Auburn, CA 95603

Regards,

Kally Kedinger-Cecil
Senior Planner
Placer County Planning Services Division
kkedinge@placer.ca.gov
530-745-3034

COUNTY OF Placer

LETTER 423: DARREN SPICER

Response to Comment 423-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 424

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HE-1 Major Issue -- 8989 Auburn Folsom Rd, Granite Bay
Date: Tuesday, February 20, 2024 9:16:09 AM

From: Darren Spicer <dspicer0425@gmail.com>
Sent: Saturday, February 10, 2024 12:56 AM
To: Board Clerk <BoardClerk@placer.ca.gov>
Cc: c10andrews@gmail.com; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: HE-1 Major Issue -- 8989 Auburn Folsom Rd, Granite Bay

Dear Board of Supervisors and Sr Planner Kally,

I'm writing to you today about the proposed Housing Element Program.
This program currently designates that the 17 acre property on the corner of **Fuller Drive and Auburn Folsom Road (8989 Auburn Folsom Road)** be rezoned from commercial use to a newly created zoning element, which establishes a maximum of 30 units per acre (510 units total).

As a citizen of Granite Bay living directly across the street from this proposal, as well as someone who has children in the local school system, I'd like to share grave concerns about this proposal, and why I do not think it is in the best interest of Granite Bay or Placer County:

424-1

a) The program requires the units to be either 'low income' or 'very low income' as defined by the California Department of Housing and Community Development. Placing this type of housing to share a border with Cavitt Jr High is **incredibly dangerous to the well being of students** and faculty at Cavitt. Without a doubt, the school district safety (and educational grade) would shift dramatically in a negative way if this were allowed to move forward. This is highly irresponsible to consider for this reason alone.

b) Theft and crime would all but be assured to increase. Placing 'very low income' housing in the center of an affluent area is a recipe for disaster on both sides of the coin, and certainly wouldn't lead to a cohesive community.

c) A quick look at the surrounding area will highlight how out of place housing such as this would be, and the assured friction that would occur between local residents and new tenants of said low-income housing. Concerns around residents of this proposed project being able to afford the cost-of-living in Granite Bay would likely lead to further animosity and challenges.

Board of Supervisors and Sr Planner Kally, I ask that you strongly assist in preventing this development from moving forward, for the safety and well-being of all parties involved.

Thank you for your time and consideration.

Best,
Darren and Cristen Spicer

LETTER 424: DARREN SPICER

Response to Comment 424-1

Please refer to Response to Comment 422-2.

Letter 425

From: Nancy Stangel
To: Placer County Environmental Coordination Services
Subject: Proper EIR
Date: Thursday, March 7, 2024 2:57:51 PM

425-1 Please hold off on the vote for building in front of Cavitt School. Makes no sense. We need a proper EIR before any more thoughts on this move forward. Has anyone seen the traffic jams already at that corner? Thank you.

Sent from my iPad

LETTER 425: NANCY STANGEL

Response to Comment 425-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 426

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Hi Density Rezone, RM-30
Date: Tuesday, February 20, 2024 9:18:57 AM

From: Jerry and Claudia Starkey <jerclaudstarkey@gmail.com>
Sent: Monday, February 12, 2024 3:57 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Hi Density Rezone, RM-30

To Whom It May Concern:

My husband and I wish to strenuously disagree with any proposal to introduce high density housing into our rural and agricultural community. We have lived in Penryn for 48 years now; our children attended Newcastle Elementary and Del Oro High School. We value the education they received here and the life they up with, in our small-town environment. We were purposeful in selection of our property in 1976, and we feel defensive about it now, in 2024.

426-1

It would be an unwise and terrible move to allow high density housing in our small community of Penryn. Placing hundreds of people in a small area close to I-80 would leave those people without services -- no grocery store, no restaurants, no public transportation. Two gas stations provide two quick-shops. That is all. This proposal would more than double the population of Penryn and our schools, placing an untenable financial burden on the present population.

The Board of Supervisors should select sites for high

426-1 cont.

density housing which could at least offer the prospective occupants of that housing access to food and transportation. Allow rural Placer County residents to enjoy the rural life that they chose and already paid for.

Sincerely,

Jerry and Claudia Starkey
7175 Allen Lane
Penryn

LETTER 426: JERRY AND CLAUDIA STARKEY

Response to Comment 426-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 427

From: Rebecca Stern
To: Placer County Environmental Coordination Services
Subject: Low income housing
Date: Wednesday, February 21, 2024 8:05:23 AM

427-1

Hi. I sent an email voicing some of my concerns. In addition, I'd like to mention that two elementary schools were closed last year, and with no plan for the MAJOR impact to Auburn elementary, all the displaced students flooded in. A " wait and see" plan was all we parents, students and staff had to deal with. Horrible impact to all. Many new students were disruptive, bullied, brought bad habits that were hard to bring into check..partially because teachers and staff were overwhelmed. Starting next year the plan is for all elementary schools to go to tk through 8th grade!! Again, with no real plan. Horrible mix- too large of an age span! Why is this important? Where are the new students from the low income housing going to go? They would end up at what WAS a safe, caring, small community school- Auburn elementary. The repercussions will be major, negatively impacting the school. Moral is already bad- you BOS members need to think of all the ways our area will be impacted!! More crime; check the sherrifs log, DeWitt and low housing has already brought more crime! And water, traffic, lack of services. PLEASE think past the $$$, and the fact that north Auburn already has enough low income housing. Check out the last development on Bell- many are already trashed. And we tax payers are tired of supplementing everything. Thank you for your time

LETTER 427: REBECCA STERN

Response to Comment 427-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 6 – Impacts to Local Schools.

Letter 428

From: Rebecca Stern
To: Placer County Environmental Coordination Services
Subject: Fwd:
Date: Wednesday, February 21, 2024 7:43:11 AM

---------- Forwarded message ---------
From: **Rebecca Stern** <sternr745@gmail.com>
Date: Mon, Jan 29, 2024, 2:05 PM
Subject:
To: <BoardClerk@placer.ca.gov>

428-1 Hi. I want to say that my family lives near Bell, where the homeless camp as well as low income housing is. I've heard that the low income homes; many, are already trashed. Also, check out the sherrifs log; lots of crime in the area. We have enough in north Auburn already, and now there's a plan to build off 49 north of us. There's not enough water, NO access to shopping or services. Traffic is already horrible there. Have you tried to turn left off Florence onto 49? Bring your lunch and drive a tank!! Makes absolutely no sense at all. It's all about the $$$. Sad. Enough of low income housing in North Auburn. Build south of Auburn. Bet you BOS members don't live in the area. Many of us do. PLEASE think about this plan and weigh my feelings and FACTORS. Thank you.

LETTER 428: REBECCA STERN

Response to Comment 428-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 429

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning of sites 71 & 72, Auburn
Date: Friday, March 8, 2024 8:49:47 AM

From: Janice Nelson stevens <sailorstevensj@gmail.com>
Sent: Friday, March 8, 2024 6:41 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Rezoning of sites 71 & 72, Auburn

429-1 As an owner of property on Lincoln Way for 46 years, I STRONGLY OPPOSE ANY REZONING OF WOODED AREAS PROPOSED IN MY AREA. Traffic is congested enough in the area & there is a school, Alta Vista, that would also be impacted.
Thank you for your attention to this matter!
Janice Stevens

LETTER 429: JANICE STEVENS

Response to Comment 429-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Letter 430

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element Rezone Site 23 - Boundary, Non-Conforming Use, and Parcel Map
Date: Tuesday, February 20, 2024 9:32:12 PM
Attachments: Site 23 - Bayside - 3.2 acres.pdf

From: Kris Steward <kris@plansteward.com>
Sent: Saturday, February 17, 2024 3:51 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: John Stewart <johns@baysideonline.com>; Christopher Pahule <cpahule@placer.ca.gov>
Subject: Housing Element Rezone Site 23 - Boundary, Non-Conforming Use, and Parcel Map

Hi Kally,

430-1

County Rezone Site #23 is a 3.2-acre portion of APN 046-090-042 owned by Bayside Covenant Church, Inc. Below are a few items that we would like to clarify.

1. **Site Boundary**. In the staff reports and Draft EIR, the 3.2-acre Site 23 is inaccurately depicted as the area north of Olive Ranch Road. The 3.2-acre area is the area north of Lawrence Drive as shown on the attached exhibit. Please correct the Site 23 site boundaries in the County exhibit(s) to match the attached exhibit.

430-2

2. **Non-Conforming Use**. The 3.2-acre area was designated as informal (children's) play area in the Bayisde Fields project (PLN19-00327. Please confirm that once the 3.2-acre site is rezoned to RM30, the Bayside Fields informal play area would be permitted as non-conforming use (PCC 17.04.020).

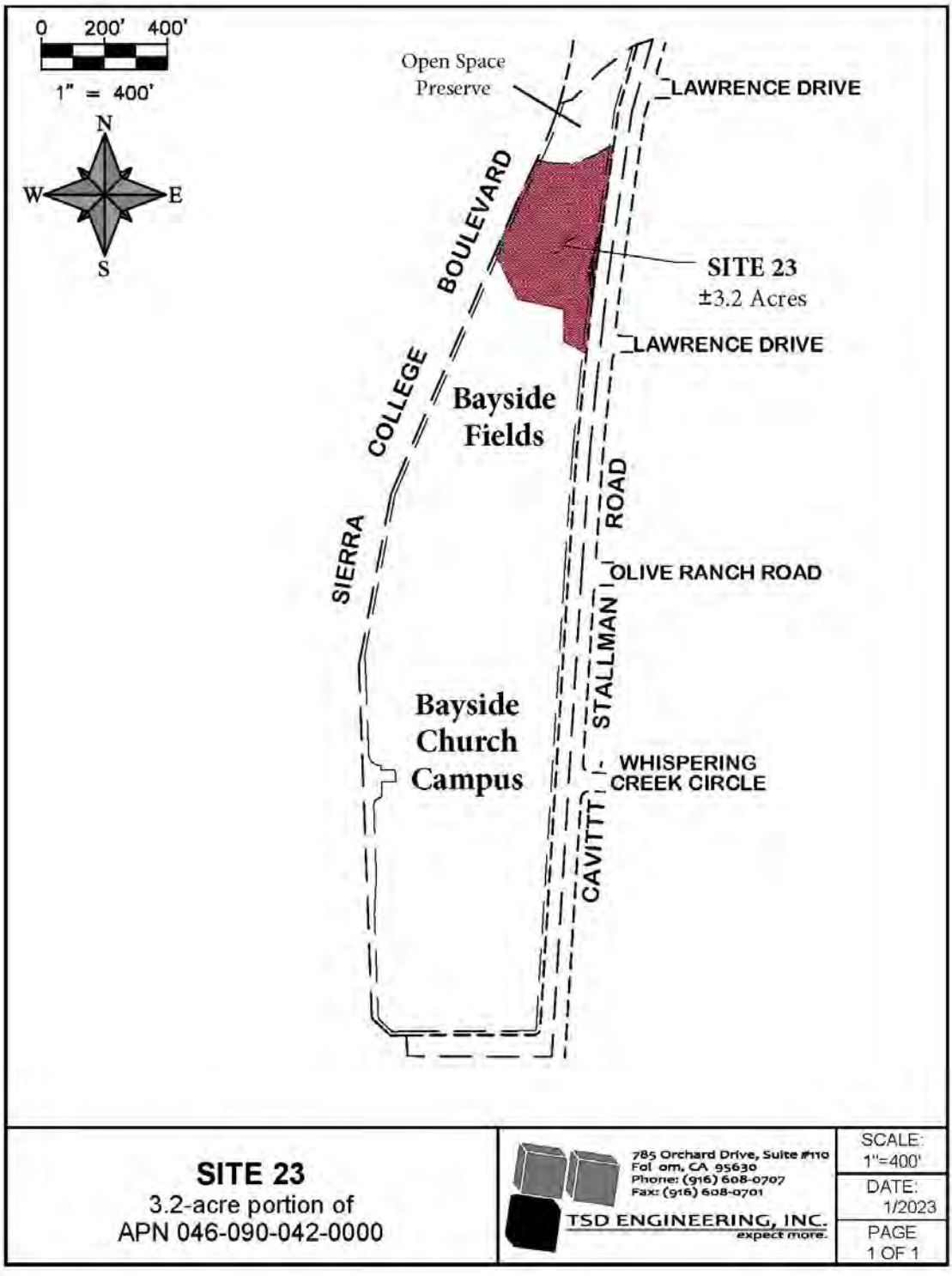
430-3

3. **Parcel Map.** Site 23 is a 3.2-acre portion of Bayside's 14.5-acre APN 046-090-042. With the County's rezone, the parcel will have split zoning. Following the County's rezone, Bayside will process a parcel map to create a 3.2-acre parcel shown (approximately) on the attached exhibit.

Thanks for the help.

Kris

Kris Steward
916-425-7906
kris@plansteward.com


0 200' 400'
1" = 400'
N
W
E
S
Open Space Preserve
LAWRENCE DRIVE
BOULEVARD
SITE 23
±3.2 Acres
LAWRENCE DRIVE
COLLEGE
Bayside Fields
SIERRA
ROAD
OLIVE RANCH ROAD
STALLMAN
Bayside Church Campus
WHISPERING CREEK CIRCLE
CAVITT
SITE 23
3.2-acre portion of
APN 046-090-042-0000
785 Orchard Drive, Suite #110
Folsom, CA 95630
Phone: (916) 608-0707
Fax: (916) 608-0701
TSD ENGINEERING, INC.
expect more.
SCALE: 1"=400'
DATE: 1/2023
PAGE 1 OF 1

LETTER 430: KRIS STEWARD

Response to Comment 430-1
Please see Response to Comment 16-1.

Response to Comment 430-2
The County has determined that existing uses can continue and expand on the sites that are rezoned. The non-conforming use language is part of the project's proposed Zoning Text Amendment.

Response to Comment 430-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 431

From: mark stroup
To: Board Clerk; Kally Kedinger-Cecil; Placer County Environmental Coordination Services
Subject: Residential Housing Needs Rezone Site #74
Date: Friday, February 2, 2024 11:00:14 AM

Honorable Members of the Board of Supervisors, Placer County, February 2, 2024

I am writing you to express my concerns and inform you of my opposition to the proposed rezoning of Housing Needs Rezone Program Assessment site #74 to High Density 20-30. This site is 15.8 acres and is located near the intersection of New Airport Road and Bell Road in North Auburn.

I am concerned that given the relatively large size of this site, the density impacts that could result from its rezoning and subsequent development could not be adequately mitigated without significantly changing the character of the existing residential developments or neighborhoods in the area.

431-1

Per HNRA staff reports, if rezoned, this site's gross potential unit count would be a **minimum of 316 units to a maximum of 474 units.** I feel that the addition of such concentrated density to this location would be inequitable and would impact this area of North Auburn disproportionately to the rest of the county. The current population of North Auburn is approximately 14,000 people and the population influx that could result from rezoning this site would not be insignificant especially to the area in its immediate vicinity. I am concerned about

the potential impacts to traffic (in particular, the intersection of New Airport Road and Bell Road) and services in the area.

Apart from the above density concerns, in my opinion, this site does not appear to be a strong candidate for inclusion in the rezone program. Per the RHNA rezone ranking criteria report, this site had a curved score of 77 with a raw score of **54** and per staff, is among the lower ranked sites. The report assigned this site a **6** out of 10 in the category of transportation accessibility, a **5** out of 10 in the topography category, a **4** out of 10 for social amenities (schools, grocery store, parks, etc,), a **4** out of 10 for safety and emergency services, a **3** out of 10 for mobility and infill acceleration area, a **1** out of 5 for green means GO, and a **1** out of 10 for TCAC/HCD opportunity area. I would submit that these scores speak for themselves.

431-1 cont.

This site is located near the Auburn Airport, it is currently zoned with a combining aircraft overflight designation (per the RHNA ranking criteria report - IN-Dc-**AO**).

To the extent that the environment or natural beauty of the area may be of concern to you, the RHNA ranking criteria report indicates that this site is located within a mixed oak woodland. I would recommend that if you are not familiar with this site, that you visit it and the areas immediately surrounding it. I suspect that upon doing so, you will have a greater appreciation for my concerns.

431-1 cont.

It seems that thus far, the site selection process for this program has been driven primarily by expediency, rather than objectivity, circumspection and equity. While I recognize that the decisions involved in this process are difficult and that you have no choice but to implement the program, such is not a justification to do so without equity. I submit that the time has now arrived for you, as policy makers, as elected officials, to intervene and act with leadership and discretion in the interests of your true constituency. I respectfully ask that you do so.

Respectfully,

Mark Stroup
Homeowner
Princeton Club Estates
Auburn, CA

LETTER 431: MARK STROUP

Response to Comment 431-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Letter 432

From: Dawn Suits
To: Placer County Environmental Coordination Services
Cc: Dawn Suits; Supervisor Gore
Subject: Housing Needs Rezone Program Cook Riolo Rd.
Date: Monday, March 18, 2024 2:54:44 PM

Placer County – Community Development resource Agency
Environmental Coordination Services
3091 County Center Dr. Ste 190
Auburn, CA 95603

Re: Housing Needs Rezone Program

Dear Placer County Planning Commission and Board of Supervisors,

432-1 I am sending this letter as a concerned Dry Creek Resident regarding the detrimental impacts of the rezoning proposal for "Affordable Housing" at Cook-Riolo (9-10). The Dry Creek / West Placer Community Plan was developed after much thought and partnership between the County leadership, Dry Creek residents and potential developers. As a result of the plan and commitment to the community, only compliant, compatible rural infill housing would be constructed in one of the most unique communities to maintain a rural high-quality and high value community.

The approve and high-density, low-income housing at Cook-Riolo (9-10), would ***devalue the home pricing*** for the long-established home owners as well as new home owners not only in the immediate vicinity but within the West Placer community as well.

432-2 The plan also introduces Increased risk to the community due to the infrastructure impact: no sidewalks, no street lights and increased traffic leading to **traffic congestion on a two-lane road that is already backed up with activity from Creekview Ranch elementary school directly across from the proposed site.** This proposal would also require more county funding for continued road maintenance and repair that would be required on a regular basis due to the establishment of a high-density development in an infrastructure that struggles to support the current routine flow of traffic.

432-3 The residents of Dry Creek have long supported the community and its leaders in the county for their commitment in low density high home value rural standard of living. The objections to the proposed rezoning of Cook-Riolo Rd (9-10) are consistent with Dry Creek community planning and development. I request the Placer County Planning Commission and Board of Supervisors to exclude Cook-Riolo (9-10) from the rezoning plan and exempt the Dry Creek community from rezoning to high density development.

Thank you
Dawn Suits
Dry Creek Resident

LETTER 432: DAWN SUITS

Response to Comment 432-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Issues.

Response to Comment 432-2

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 432-3

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 433

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30
Date: Tuesday, March 19, 2024 10:55:47 AM
Attachments: Outlook-l4lqymur.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:04 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Aren Swartz <aren.swartz@gmail.com>
Sent: Friday, March 1, 2024 1:32 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>; Supervisor Gore <SupervisorGore@placer.ca.gov>
Subject: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Dear Members of the Planning Department,

433-1

I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

433-1 cont.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning.

Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely,

Aren Swartz

LETTER 433: AREN SWARTZ

Response to Comment 433-1

Please see Responses to Comments 115-1 through 115-7.

Letter 434

From: Sweet, Zac @ Roseville
To: Placer County Environmental Coordination Services
Subject: Property 26
Date: Friday, March 8, 2024 10:59:46 AM

434-1 What is status of EIR? Nobody wants this project.

Zac Sweet SIOR | Senior Vice President | Lic. 01352800
CBRE | Advisory & Transaction Services
1512 Eureka Road, Suite 100 | Roseville, CA 95661
T 916 781 4810 | F 916 781 4870 | C 916 717 4768
zac.sweet@cbre.com | www.cbre.us

Details about the personal data CBRE collects and why, as well as your data privacy rights under applicable law, are available at **CBRE – Privacy Policy.**

LETTER 434: ZAC SWEET

Response to Comment 434-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 435

To: Placer County
Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr., Ste 190
Auburn, CA 95603

From: Dry Creek resident(s)

Subject: Housing Needs Rezone Program

February 18, 2024

To Placer County Planning Commission, Placer County Board of Supervisors:

435-1 The adopted Dry Creek / West Placer Community Plan was developed to protect against significant, negative, and cumulative impacts that accompany rural infill projects. When the plan was developed, long-time residents recognized growth would inevitably come to the Dry Creek community. Goals and policies were designed with the County to reduce, mitigate, and minimize future infill damage. Unfortunately, the impact of this rezoning proposal to allow high density, low income housing projects to be developed in Dry Creek would be a huge blow to our community's long established rural lifestyle. The Residential Multifamily 30 {RM30} rezoning or HDR 20/30, if/when adopted, must not be applied to Dry Creek's rural community for a myriad of reasons.

Obviously, apartments cannot magically be made compatible with the existing rural homes and property, nor can they be seen as desired rural infill housing. The site off Cook-Riolo Rd or anywhere in Dry Creek would be a mistake, and would cause damage to existing residents as well as increase traffic in our community.

435-2 The high density, low income proposal for sites 9-10 in Dry Creek would add considerable construction noise and adversely affect the quality of life and property values for residents who live directly adjacent to the project and who moved to the area for its rural ambience. Construction vehicle traffic and future residents would create a serious conflict with the existing traffic pattern and congestion already under strain from the log jams created by parents dropping off/picking up their children at the school which is located directly across the street from the proposed site. Residents already experience frustration by not being able to exit or enter Cook-Riolo from their homes due to cars piling up on the road because of the traffic light at the school, or the fact that the school was not designed to accommodate the high number of vehicles pouring

435-2 cont. in almost daily which causes the overflow of cars to stagnate on the street for quite some time until the line of cars within the school perimeter is able to move along.

435-3 Many meetings between the County, existing Dry Creek residents, and potential developers culminated in our Dry Creek / West Placer Community Plan. Once the plan was adopted, it was expected that only compliant, compatible "rural infill" housing would be constructed in our unique Dry Creek community which would not ruin the area's rural character or its riparian corridor. Based upon this, Dry Creek residents have invested in improving the value of their homes and property and in building the value of our rural community and its unique qualities. The plan provided our community and the County representatives with specific parameters to guide development. *An important component of the plan was the adopted zoning of 1 home/acre north of the creek.*

435-4 Although we understand and are sympathetic that the County must meet the quotas outlined in the RHNA % allocation requirements for low income housing, the Board of Supervisors and the Planning Commission must also in turn acknowledge that unlike other locations identified in the Placer County Housing Element 2021-2029, little Dry Creek is not a city, nor a large community. Public services and infrastructure are used more often by residents of high density, low income developments. Dry Creek does not have the city services or resources available for the residents who would occupy the low income housing. Dry Creek relies on a Placer County Sheriff assigned to all to Dry Creek and West Placer. CHP is also spread thin in our end of the County. Additionally, there is very limited employment opportunity in Dry Creek. There are no markets, medical or health services, food banks, or clothing stores available in Dry Creek... this is 'the country'. Residents of high density, low income housing also rely more on public transit and walking for transportation. The nearest bus line is 1 mile to the north at Baseline & Woodcreek Oaks, and 2 miles to the east at Vineyard & Foothills Blvd. Neither of these locations have access to sidewalks for those who must walk to catch the bus. High density, low income housing does not work or belong in our rural area.

435-5 Placer County has the ability to meet the requirements for low income housing by designating sites within existing city development. Typically, urban areas have high density buildings and tend to be more walkable, with greater public transportation, while rural areas have low density housing. Placing the higher density housing projects near similarly high density zoning makes more sense. Locating the rezone projects near services or resources low income residents might need and could gain access to more easily would better serve the occupants.

435-6 Dry Creek residents remain keenly focused on continuing to protect the endangered riparian corridor and flood plain, the habitats of our wildlife, water quality and quantity in our wells, and maintaining vital open areas which provide for historic drainage routes to accommodate and filter rain runoff and allow groundwater to recharge. The Dry Creek Community Plan's goals, policies and guidelines were carefully framed and aligned with not only our rural community's needs, but with the requirements of CEQA [California Environmental Quality Act], Water Resources Board regulations, the shared vital interests of neighboring jurisdictions [Re: ground water Board regulations, the shared vital interests of neighboring jurisdictions [Re: ground water recharge, traffic, and flood control], Fish and Game efforts to enhance the creek and riparian corridor, SACOG/ Regional Transportation plans & Regional Trails plans, etc.

435-7 We ask Placer County in cooperation with Dry Creek residents, to uphold the Dry Creek Community Plan to accommodate *compatible* rural infill projects for build out. The Dry Creek community's warranted, germane objections to this proposed rezoning for high density low income housing is not a NIMBY (not in my backyard) reaction. Rather, it is consistent with the community's decades long, ongoing public comment participation to preserve Dry Creek.

435-8 Allow Dry Creek to continue with our beneficial plan to absorb compliant, compatible rural infill that can complement and enhance our rural community. Please don't create new headaches and exacerbate existing problems. At this point, it should be abundantly clear why the rezoning program being proposed is not feasible or reasonable to apply to a site in this small rural community, especially when it would be better suited in a more developed part of the county. The County must select a different site where it will complement neighboring design goals and meet the needs of those future residents.

435-9 We respectfully request our elected representatives tasked with providing for our safety and that of our community, enforce our sound Dry Creek Community Plan and have all infill projects comply with its goals and policies. By doing so, the County will be helping to enhance and protect existing residents' quality of life and preserve the rural character of Dry Creek. We request Dry Creek be excluded and exempt from the rezoning program which would be extremely detrimental to this country neighborhood.

Sincerely,
Michael Sysum

LETTER 435: MICHAEL SYSUM

Response to Comment 435-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 435-2

Please see Master Response 2 – Social and Economic Impacts and Master Response 4 – Traffic Safety. In addition, potential impacts related to construction traffic are discussed in Chapter 8 of the Draft EIR. As discussed therein, implementation of Mitigation Measure 8-1, which would require that a construction traffic control plan be provided to the Engineering and Surveying Division for review and approval prior to the commencement of construction at any rezone site, would ensure impacts related to construction traffic would be reduced to a less than significant level.

Response to Comment 435-3

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 435-4

Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, the project's potential impacts related to utilities infrastructure are addressed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project. See also Response to Comment 81-3 regarding sewer concerns, and note that any future residential development on rezone sites within the Dry Creek area would be required to connect to public water, supplied by the Placer County Water Agency (PCWA), which, according to Table 5 of the Initial Study (Appendix A of the Draft EIR), has ample water supplies available to serve reasonably foreseeable future development during normal, dry, and multiple dry years through 2040.

The commenter also appears to express concern that the Placer County Sheriff cannot adequately serve new development. The discussion on page 10-35 of the Draft EIR, regarding fire protection services, is also applicable to law enforcement services. As stated,

> The approach to analyzing a project's impacts on fire protection services, pursuant to CEQA, is often misunderstood. Industry practice has often focused on any type of demand upon a fire department or district that may be generated by a project, such as an increased need for staffing, or the need for new firefighting equipment. These are important considerations, but they are not CEQA considerations per se. This important point can be seen by a careful reading of the language in Appendix G of the CEQA Guidelines (Section XV. Public Services). The language focuses on whether a project's increase in demand is such that a fire service provider would need to build new or expand existing governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives. The reason for this focus is that

> building new facilities, or expanding existing facilities, requires construction activities and disturbance of the physical environment, which is the focus of CEQA.
>
> According to CEQA Guidelines Section 15002(g), a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project. "Environment" means the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance (PRC Section 21060.5).
>
> The courts have affirmed this understanding. In the case *City of Hayward v. Board of Trustees of the California State University,* the First District Court of Appeal affirmed that the focus of CEQA analysis should be limited to physical environmental impacts related to a project.[1] The court held that, "The need for additional fire protection services is not an *environmental* impact that CEQA requires a Project Proponent to mitigate." In addition, while lack of funding to operate existing fire protection facilities is an important consideration, it is not directly relevant to CEQA.
>
> With this important understanding, the analysis can proceed with appropriately focusing on an evaluation of whether the project's demand upon fire service providers would generate the need to build new fire protection facilities or expand existing facilities.

Based on the analysis within the Initial Study (Appendix A to the Draft EIR), it was determined that an expanded or new Sheriff sub-station would not be required to serve the proposed project.

Response to Comment 435-5

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 435-6

Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, potential impacts to special-status species and habitat are addressed in Chapter 5, Biological Resources, of the Draft EIR. It is noted that while a few rezone sites are located adjacent to tributaries to Dry Creek, none of the proposed rezone sites are located adjacent to Dry Creek itself. Chapter 5, Biological Resources, of the Draft EIR includes Mitigation Measure 5-2(j) to protect special-status salmonids should any construction occur within their habitat. For example, Mitigation Measure 5-2(j) requires compliance with PCCP Species Condition 7: Salmonids, which has specific measures for work in and adjacent to salmonid streams. These measures have already been approved by the National Marine Fisheries Service (NMFS) through the approval of the PCCP.

Future residential developers would also be required to pay land conversion fees to PCA which goes towards preservation of habitat within dedicated preserve areas pursuant to the PCCP. This is the regional strategy that resource agencies have agreed to in order to help balance the need for development and habitat preservation.

Response to Comment 435-7

Please see Master Response 1 – Non-EIR/Administrative Issues.

[1] First District Court of Appeal. *City of Hayward v. Board of Trustees of the California State University*. (November 30, 2015) 242 Cal.App.4th 833.

Response to Comment 435-8

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 435-9

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 436

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: District 1 proposal
Date: Tuesday, March 19, 2024 10:58:39 AM
Attachments: Outlook-vqpfms3p.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:13 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: District 1 proposal

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: TAMER TADROS <tamer_n_t@hotmail.com>
Sent: Sunday, March 17, 2024 8:15 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: District 1 proposal

Dear Planning commission Representative, Robyn Dahlgren

436-1

I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

4336-1 cont.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning.

Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely,
Tamer Taddross

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

LETTER 436: TAMER TADDROSS

Response to Comment 436-1

Please see Responses to Comments 115-1 to 115-7.

Letter 437

March 16, 2024

Placer County Board of Supervisors
ATTN: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors

RE: Housing Rezone Program Draft Environmental Impact Report (DEIR)

437-1

My name is Holli Tams, I am a Placer County resident with an address at 7940 W Hidden Lakes Drive Granite Bay CA 95746.
I am in opposition to site 26 in Placer County as a Housing Element for the following reasons:

a. Gov Code: 65890.1 Job housing balance: The plan to encourage the balance between employment-generating uses with residential uses to employment related commuting is minimized.
b. Gov Code 65584.04 € Emergency evacuation route capacity, wildfire risk, earthquakes etc. There should be two escape routes.

I believe if Placer County wants to invest in affordable housing it should target its largest population which according to the Placer County Five Year Growing Senior Plan is our aging senior citizens. Seniors 60 years and older are growing at a 147% growth rate and seniors 85 and over are growing at a 547% growth rate as compared to the general population.

Sincerely,

Holli Tamas

Holli Tamas

LETTER 437: HOLLI TAMAS

Response to Comment 437-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The concern about access/evacuation is noted for the record and would be considered by the County should the site be rezoned and an application be submitted at a later date for residential development. The proposed project does not include any site-specific development plans, designs, or proposals at this time. However, all new developments that occur within the County would be required to comply with all applicable design standards as part of constructing or modifying the transportation system. For example, Policy 3.A.2 of the Placer County General Plan requires all streets and roads to be constructed in accordance with General Plan, community plan, and specific plan standards.

Letter 438

March 6, 2024

Placer County Board of Supervisors
ATTN: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

438-1

My name is Holli Tams, I am a Placer County resident with an address at 7940 W Hidden Lakes Drive Granite Bay CA 95746.
In regard to the public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

In addition, I am writing in support of the letter written by the Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024. I respectfully request the Board to consider the concerned expressed there in as an extension of my own opinion.

Sincerely,

Holli Tamas

Holli Tamas

LETTER 438: HOLLI TAMAS

Response to Comment 431-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 439

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Comments for HCD on Placer County Housing Element Amendment
Date: Monday, March 11, 2024 10:09:46 AM
Importance: High

From: Gary Taverrite <GTaverrite@msn.com>
Sent: Friday, March 8, 2024 2:18 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: Comments for HCD on Placer County Housing Element Amendment
Importance: High

Dear Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1. I think it is problematic that several new developments in District 1 have not been required to meet the 10% obligation for low-income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential lawsuits such as the Martinex vs. City of Clovis not working to actually build low income (affordable) housing as they were supposed to do.
2. The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (i.e., water table and flood issues). The existing houses in these community's house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.
3. The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds local community is hardly "underutilized". Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate of even a sour ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city—not a county where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low-income housing.
4. The plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or

439-1

439-1 cont.

included in the Draft EIR for properties proposed in District 1, one of which is directly across from Creekview Ranch School.

For these reasons, I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Thank you,

Gary Taverrite
425-894-4521

LETTER 439: GARY TAVERRITE

Response to Comment 439-1

Please see Responses to Comment Letter 62.

Letter 440

From: Karrie Taylor
To: Placer County Environmental Coordination Services
Subject: Draft Housing Element Sites Rezone EIR - Public Comment
Date: Monday, March 18, 2024 4:47:34 PM
Attachments: image.png

Good afternoon,

Thank you for the opportunity to comment on the Draft Housing Element Sites Rezone EIR, my comments for your consideration are below.

As this is a topic of great public interest, the Board of Supervisors should consider adding a new noticing requirement for all RM30 projects. This would keep the current individual project noticing requirement of 300' in place, however if a project is designated with the RM30 zoning, property owners within an expanded range will be notified. The RM30 expansion should include/consider the areas of direct impact for residents such as school districts, fire service area, emergency/hospital service areas, traffic & safety impacts, etc. At minimum the RM30 noticing should include a 5-10-mile radius of the project site, depending on the direct impact factors listed above. Physical mailers should be sent to all RM30 zoning property owners. Social media posts are great, but a large majority of residents don't get their information from Facebook/Instagram/etc.

The County should consider revising the Affordable Housing and Employee Accommodation Ordinance regarding residential projects exceeding 100 units. Currently, residential projects of eight units to 100 units, the owner shall pay an affordable housing fee on all newly constructed market rate dwelling units. This should be amended from eight units to 100 units to eight units to 50 units, the owner shall an affordable housing fee. Any project over 50 units should be required to build the actual 10% of low-income units they are required to, and no longer have the option to pay fees in lieu. It should also be required that those 10% low-income units be built first or included in the first phase of a project.

440-1

The county should promote the use of current commercial buildings as future mixed-use with residential units that count towards the RHNA requirements. This would allow owners of commercial buildings the option to renovate some portion of a commercial building to residential use, including building upwards/adding a second/third story. These residential units could be tied into the existing commercial infrastructure (water, sewer, power, parking, etc.) allowing them to use an otherwise dormant infrastructure outside standard business hours. The county should review its current policies and regulations to ensure they support commercial property owners in that they would not lose their commercial designation should they choose to add residential units as part of the RHNA/RM30 zone. The county should look to incentivize this use in the form of reduced county fees that are not for designated for school districts, fire/emergency/hospital/infrastructure.

All county-owned properties should be rezoned RM30 and reviewed for RHNA low-income housing units. The current solar panel project the county has planned for the property located at Cincinnati Dr should not be a barrier to it being considered for RM30, perhaps these projects can co-exist, but it should not impede.

The County BOS should strongly consider passing a resolution similar to the one the City of Auburn recently adopted at the March 11, 2024, City Council meeting relating to protection of local control of land use issues. This resolution pertains to supporting local control of

zoning and housing issues, as opposed to one-size-fits-all statewide housing policies. It makes the statement that local jurisdictions best determine land use policies that affect their residents. Many comments by residents have been made at several public meetings regarding the over-reaching policies of the state encroaching on local jurisdictions. As representatives of Placer's residents, the county should strongly consider vocalizing this at the state level and pushing back against state regulations.
https://auburn.granicus.com/MetaViewer.php?view_id=2&clip_id=1336&meta_id=23010

The county should review the goals of each of the departments to ensure they are truly serving the residents of Placer County. While researching whether the balance of the developer fees in lieu account was listed in the FY 2023-24 County Budget, I came across the Community Development Resource Agency Individual Budget Detail Schedule, linked below. The mission statement of the CDRA department is "to provide a progressive, clear, and timely development process that focuses on the public interest, protecting the County's many natural resources, and creating balanced, sustainable communities." What I find inconsistent with the "public interest" in the above statement is the department's number one objective and performance measure for the FY 2023-24 is to "Facilitate legislative efforts mandated by the State".

440-1 cont.

Community Development Resource Agency

Mission Statement:

The mission of the Community Development Resource Agency is to provide a progressive, clear, and timely development process that focuses on the public interest, protecting the County's many natural resources, and creating balanced, sustainable communities.

County Service System: Land Use System

Objectives and Performance Measures:

Obj #	Objective	Strategic Plan Critical Success Factor
1	Facilitate legislative efforts mandated by the State	Balanced Land Use Planning and Environmental Stewardship
2	Review plans and inspect construction to verify work complies with building codes for safe and habitable structures	Balanced Land Use Planning and Environmental Stewardship
3	Get ahead and stay ahead of impacts to wetlands, other special habitats, and of the conversion of natural / natural semi-natural lands to urban / suburban land use on an acre-for-acre basis	Balanced Land Use Planning and Environmental Stewardship

https://www.placer.ca.gov/DocumentCenter/View/70560/Community-Development-Resource-Agency-PDF

Tying in with my comment above about the City of Auburn's newly passed resolution, the county should be taking a stance that it represents the best interests of its residents, even if that means going against state policies that don't suit our area. There seems to be a difference between how elected officials lead – either they believe they are elected by the people and once in office they are free to vote how they wish, OR, they believe they are elected to be the voice of the people and will vote how their constituents ask them to. Placer County is one of the last great places in California that hasn't been totally trashed by state mandates and policies. If Placer doesn't start pushing back on the state our county will be trashed just like where everyone moving here moved from. CDRA, and all county department's objectives and performance measures should NOT be to arbitrarily push state agendas against local consent.

Thank you for the opportunity to comment,
Karrie Taylor
Placer County Resident - District 5

LETTER 440: KARRIE TAYLOR

Response to Comment 440-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, and Master Response 6 – Impacts to Local Schools.

Letter 441

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: County Proposal for Property Rezoning
Date: Tuesday, March 19, 2024 10:58:09 AM
Attachments: Outlook-0w0cdkwp.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:10 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: County Proposal for Property Rezoning

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: dena thomas <wchero08@gmail.com>
Sent: Thursday, March 14, 2024 10:44 AM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: County Proposal for Property Rezoning

Representative Dahlgren,

441-1

I would like to voice my opposition to the inclusion of sites 7, 8, 9 and 10 in the Placer County plan for high density/low income housing.

The Dry Creek community is marketed/sold as a rural community lifestyle. Those of us who have purchased homes in this community have done so specifically for the quieter, more rural environment. We also paid a premium for our homes accordingly. The inclusion of high density/low income housing directly adjacent to our homes introduces light pollution, noise pollution and an exponential increase in traffic. It also greatly reduces privacy, since

441-1 cont.

these will be multi-story structures impeding on adjacent communities of single story homes. This plan will also erode the property value of our homes.

I would expect county planning to be thoughtfully done, to preserve communities and home values as much as possible, and introduce this type of housing in non-rural areas that already have medium/high density housing, or areas that have not already been fully established as low density housing areas, and marketed/sold as such. Additionally, introducing 90+ dwelling units directly across from a school, in an area that is not designed for, or equipped to handle, such an increase in traffic, compromises the safety of children going to and from school on foot, as well as by car.

Please consider removing parcels 7, 8, 9 and 10 from the Placer County plan for property rezoning, and relocating proposed construction to areas more suitable to this type of housing, with less impact to existing residents. This proposal would be detrimental to the Dry Creek community and its residents, negatively impacting the way of life we bought into, as well as the value of our properties.

Thanks for your time.

Dena Thomas
Silky Oak Drive
Roseville CA

Sent from my iPhone

LETTER 441: DENA THOMAS

Response to Comment 441-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is not currently evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations do not currently constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies; the relevant information will be provided in project staff reports and made available to the public and decision-makers.

With respect to lighting concerns, please see Response to Comment 396-1.

It is also noted that the Draft EIR included a programmatic noise analysis in Chapter 7, Noise, that determined operational noise from multi-family development is limited in nature (e.g., site circulation and HVAC noise) and is not anticipated to exceed the County's applicable noise thresholds, based on the modeling conducted for the Draft EIR. While noise may still be audible from such developments, audible noise does not equate to a significant noise impact pursuant to CEQA if applicable thresholds are not exceeded.

Letter 442

From: DEBRA THOMPSEN
To: Placer County Environmental Coordination Services
Cc: DEBRA THOMPSEN; Neil; Supervisor Gore
Subject: Comments on Draft EIR - Housing Rezone Program
Date: Monday, March 18, 2024 1:40:21 PM

Dear Kally,

Although we have lived in Roseville for approximately 30 years, we are fairly new residents of the Dry Creek community and are located in Brady Vineyards. We are writing to express our concerns as well as opposition on the draft EIR report. The proposed rezoning of Parcels #7-10 are impractical for the 2 lane roads and resources in this beautiful rural area just outside the city boundaries. The nearby rural environment is a large part of WHY we selected to move to this area. We were advised by a phone call to the County and directly from the builder that the surrounding area was zoned only for agricultural and 1-2 residences per one acre parcels. Now I learn that these rezoning plans have been in place prior to when we made the decision to purchase in July 2023. Unacceptable.

We oppose the Draft EIR in regard to Dry Creek because it consolidates all the unincorporated areas together and does not specifically address the environmental impact to Dry Creek. Our main concerns are parcels, 7,8,9, and 10, but it applies to other areas in the report! My understanding is that Parcel 7 may be within a flood plain. There are service resource (Fire & police) concerns that are inadequately addressed in the EIR. No indepth analysis was done on the individual parcels (Draft EIR states site specific details, including development proposals or technical studies, are not available at this time). DETAILS seems essential - otherwise the report is inadequate at best.

442-1

We also oppose the traffic section of the Draft EIR as it pertains to the identified Dry Creek parcels #7-10 because your report does not adequately address traffic concerns or mitigations regarding residents walking or bike riding to school. The Draft EIR indicated a possible bike paths down Vineyard but make no mention of current statistics regarding fatalities on Vineyard or that a bike path installment would encroach on the current residents along Vineyard." In addition the EIR states there is no impact on infrastructure, that seems impossible. If the high density housing were to be implemented, there would be 'hundreds of cars' traveling down the the two lane country type roads. There definitely will be impact to the transportation infrastructure. If the roads need to be widened as a result of the rezoning, that will likely encroach on long standing residential homes and property and new housing (For us personally the impact would be along Brady and Vineyard).

The communication of the proposed rezoning was not inclusive, and certainly does not appear community stakeholders, namely residents, were part of the process. This is unacceptable and does not seem to be in compliance with the EIR process. Now that the residents have been made aware, we are certain you are getting a strong response of opposition.

We understand Roseville needs affordable housing, but not at the expense of this community (and the fact that all of the District 1 proposed rezoning is in less than a 3 square mile radius which clearly would result in a negative impact in Dry Creek). We respectfully request that these parcels (7,8,9, and 10) be eliminated for consideration to rezone into high density housing, and that the County diligently look for other vacant properties that are better suited to handle the population, traffic and adequate resources needed with a high density change.

Sincerely,
Debra and Robert Neil Thompsen
1810 Petite Verdot Lane
Roseville, CA 95747

LETTER 442: DEBRA AND ROBERT NEIL THOMPSEN

Response to Comment 442-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. In addition, it should be noted that project-related traffic and potential traffic safety hazards are programmatically evaluated in Chapter 8, Transportation, of the Draft EIR.

Letter 443

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Comments for HCD on Placer County Housing Element Amendment
Date: Monday, March 11, 2024 10:30:38 AM

-----Original Message-----
From: Debra Thompsen <thompsens@comcast.net>
Sent: Friday, March 8, 2024 6:17 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Cc: Neil Thompsen <neil.thompsen@gmail.com>
Subject: Comments for HCD on Placer County Housing Element Amendment

To:
Kally Kedinger
Jess Negrete

Placer County Staff and HCD Staff,

We are writing to express 4 concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) We think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to.

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

443-1

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

For these reasons we believe that the HCD should require Placer County to take more time to find more appropriate

443-1 cont.

properties that will serve the current and future residents of Placer County appropriately.

Sincerely,
Debra and Robert Neil Thompsen
1810 Petite Verdot Lane
Roseville, CA 95747

Sent from my iPhone

LETTER 443: DEBRA AND ROBERT NEIL THOMPSEN

Response to Comment 443-1

Please see Responses to Comment Letter 62.

Letter 444

From: Gregg Thompson
To: Placer County Environmental Coordination Services; Suzanne Jones
Subject: HE-1 Site
Date: Thursday, March 14, 2024 3:38:41 PM

I just was made aware that the parcel below is being considered for one of the HE-1 sites. I strongly object to having low income to very low income housing near Cavitt Junior High School! Having all of the trouble/crime involved with low income housing so close to 400 students! That is not healthy in so many ways. Consider other Placer County or Granite Bay locations!

444-1

Identified HE-1 Sites

- 8989 Auburn Folsom Road
  - Prioritized as #15 on the list of 72 properties
  - The site adjoins the parcel right next to Cavitt Junior High School which educates nearly 400 students
  - 17.50 acres
  - APN: 047-150-053-000

Thank you,
Gregg Thompson

LETTER 444: GREGG THOMPSON

Response to Comment 444-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 445

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Property Rezone
Date: Tuesday, February 20, 2024 9:20:55 AM

From: Jenny Palmer <jennypalmer49@yahoo.com>
Sent: Tuesday, February 13, 2024 10:08 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Property Rezone

Dear Mrs. Kedinger-Cecil,

445-1

I wanted to reach out regarding the public hearing on the rezoning of the property that is next to Cavitt Jr. High School to allow for low to very low income housing. My family and I have lived in the Granite Bay area just off of Auburn Folsom for over 35 years. We love where we live and our community and there is a reason why we chose to live more on the outskirts of Granite Bay verses right in the heart of the city. We enjoy seeing open land and having less congestion in the area, although that continues to increase. This development would just make that worse. Not to mention, they are trying to develop very low to low income housing right next to a junior high school where hundreds of children attend school. I am concerned for the safety of the children. There is already an increased drug and homeless issue at Folsom Lake which also backs up to the junior high school. There are many young families in this area and it is scary to think with just one development how much of the safety will be affected. I encourage the County to reconsider this rezoning as we are not for this development.

Thank you,
Jennifer Thompson
(916) 955-8917

LETTER 445: JENNIFER THOMPSON

Response to Comment 445-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 446

From: Courtnee Thornton
To: Placer County Environmental Coordination Services
Subject: Penryn Rezone
Date: Monday, March 18, 2024 7:00:40 AM

446-1

Good morning , I am writing today to express my concern for the high density rezone in Penryn. First an foremost I think it is an absolute disservice to the entire community to even consider any additional housing until we have more resources for the community such as schools, fire stations, police presence and city officials that actually answer their phone and emails. Our single school in Penryn is already impacted in most grade levels and children are being sent elsewhere. Additionally, most schools in Loomis are impacted at every grade level so where are the hundreds of new proposed housing residents supposed to send their kids to school?Loomis is already growing at a rate far quicker than their infrastructure can handle how is the even smaller town of Penryn supposed to fair with hundreds of additional houses and apartments when they can't even keep up with how quickly it has grown now?! Siblings are being placed at different schools and low income students will take precedence over the families that actually pay the property taxes for our town and score a spot at our over impacted school before a long time resident whose sibling attends that very school forcing the parent to separate the two! Adding more schools and resources should be at the very top of the list before even considering the possibility of adding high density housing to our small town! Not to mention the Penryn RD exit is already over impacted at most times of day becoming very dangerous with no stop light I don't think anyone has even considered the dangers and traffic this will bring for all involved. I highly suggest you reconsider this location.

LETTER 446: COURTNEE THORNTON

Response to Comment 446-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, and Master Response 6 – Impacts to Local Schools.

Letter 447

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Penryn Rezone
Date: Tuesday, February 20, 2024 9:12:35 AM

-----Original Message-----
From: Courtnee Thornton <courtnee.thornton@yahoo.com>
Sent: Wednesday, February 7, 2024 6:35 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Penryn Rezone

447-1

Good morning , I am writing today to express my concern for the high density rezone in Penryn. First an foremost I think it is an absolute disservice to the entire community to even consider any additional housing until we have more resources for the community such as schools, fire stations, police presence and city officials that actually answer their phone and emails. Our single school in Penryn is already impacted in most grade levels and children are being sent elsewhere. Additionally, most schools in Loomis are impacted at every grade level so where are the hundreds of new proposed housing residents supposed to send their kids to school?Loomis is already growing at a rate far quicker than their infrastructure can handle how is the even smaller town of Penryn supposed to fair with hundreds of additional houses and apartments when they can't even keep up with how quickly it has grown now?! Siblings are being placed at different schools and low income students will take precedence over the families that actually pay the property taxes for our town and score a spot at our over impacted school before a long time resident whose sibling attends that very school forcing the parent to separate the two! Adding more schools and resources should be at the very top of the list before even considering the possibility of adding high density housing to our small town! Not to mention the Penryn RD exit is already over impacted at most times of day becoming very dangerous with no stop light I don't think anyone has even considered the dangers and traffic this will bring for all involved. I highly suggest you reconsider this location.

LETTER 447: COURTNEE THORNTON

Response to Comment 447-1

Please see Responses to Comment Letter 446.

Letter 448



NANCY THYM

Nancy Thym · 290 Electric St. · Auburn, CA 95603 USA · TEL 530-885-4930 · Cell 303-842-9964 · harfe@gotisches-haus.com

Auburn, March 11, 2024

Placer County Planning Department
3091 County Center Drive
Auburn, CA 95603
Mr. Chris Pahule Planning Director
cpahule@placer.ca.gov
Ms. Kally Kedinger-Cecil Senior Planner
kkedinge@placer.ca.gov

Dear Placer County Planning Department,
I am writing to you in regards to the potential high-density RM30 rezone of the following sites in the City of Auburn.

Site #71 – APN 054-290-064-000 - 85 LINCOLN WY AUBURN 95603 – 2.9 acres - 126,324 sq. ft.
Site #72 – APN 054-290-065-000 - 85 LINCOLN WY AUBURN 95603 – 4.5 acres - 196,020 sq. ft.

448-1

I was born and raised on the property on which I now reside. I love Auburn and my neighborhood and the rural feel of where we live. The above two properties are within 300 feet of my property. I am strongly opposed to the high density RM30 rezoning for these properties for the following reasons:

Destruction of rural nature of our area of Auburn
It is important to me to preserve the rural nature of our area. We live in a predominantly single-dwelling neighborhood with lots of trees and vegetation. We live in a rural area, because we do not want the feeling of living in a large city with lots of traffic and apartment buildings up to three stories high. It is important to preserve the charm of our neighborhood.

448-2

Environmental Impact
I know from personal experience that the sewer and water systems in this area of Auburn are not set up for additional housing. Developing the utilities for this many units also means a major impact on the environment.

Increased population density would mean increased destruction and pollution of the watershed leading into Calcutta Falls, recreational beaches and the American River.

The view when taking the curve on Lincoln Way is one of the most spectacular in the Auburn area. A breathtaking vista of the snow-capped Sierra Nevada mountains suddenly appears and it is the best spot to watch the sun and the moon rising. It would be a shame to obstruct that vista.

448-3

Safety
These properties are located on one of the most dangerous blind curves along Lincoln Way (even way back in the 60s it was dangerous and my grandfather was hit there). The added entrances on to Lincoln Way for up to 200 units and the increased amount of traffic (figuring

448-3 cont.

2 cars per household = up to 400 more cars!) would render the situation at this curve even more deadly.

448-4

Housing needs
I am aware of the need for affordable housing and I am not opposed to it in principal. People with limited incomes and young families just starting out deserve a healthy environment in which to live. But large apartment complexes in rural areas are not the solution. The new subdivisions that have been approved by the County should have resolved the State mandates for more affordable housing.

448-5

Therefore and for the above-mentioned reasons, I urge the County to consider other sites for RM30 zoning that do not have such a negative impact on our surrounding Auburn community neighborhoods.

Yours sincerely,
Nancy Thym-Hochrein
Cc.
Placer County Board of Supervisors
Auburn City Council

LETTER 448: NANCY THYM-HOCHREIN

Response to Comment 448-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 448-2
Please see Master Response 1 – Non-EIR/Administrative Issues. It should be noted that potential impacts to sewer and water systems are discussed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project. In addition, project-related impacts to scenic vistas are discussed in Section I, Aesthetics, of the Initial Study prepared for the proposed project.

Response to Comment 448-3
Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 4 – Traffic Safety, as well as Response to Comment 392-5.

Response to Comment 448-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 448-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 449

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:08:57 AM

From: Brittany Tiago <tiagobrittany@gmail.com>
Sent: Friday, March 8, 2024 1:17 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element and the proposed rezoning for properties across Placer County.

1) The major new developments in District 1 have not been made to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall) this also leads to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing);

2) The places that have been chosen in Districrr 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems not manageable for them;

449-1

3) The criteria that the county used to seek out sites for rezoning were relatively random (the idea of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch (Property which feeds the local community is hardly "underutilized." The idea that it has to be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement her attorneys were able to make with the city of Clovis And the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going (posting the signs on a Friday nightbefore a Tuesday meeting which was reviewing it is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable). Dry Creek Joint Elementary School District was not consulted or

449-1 cont.

included in the Draft EIR for properties proposed in District 1.

For these reasons I believe that Placer County should take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Thank you for your time,
Brittany Tiago

LETTER 449: BRITTANY TIAGO

Response to Comment 449-1

Please see Responses to Comment Letter 62.

Letter 450

From: Brenda Timmins
To: Placer County Environmental Coordination Services
Subject: Stop Rezoning of Dry Creek
Date: Monday, March 18, 2024 3:31:35 PM

Donald & Brenda Timmins
8111 Stickles Lane
Roseville, CA 95747
Bltimmins101@gmail.com

Shirlee Herrington
Environmental Coordination Services
cdraecs@placer.ca.gov

RE: Rezoning of property in Dry Creek, Placer County

Dear Ms. Herrington,

450-1

We live in Dry Creek and strongly oppose any rezoning in said area, particularly Property #9, #10 (both of which only yesterday posted notice), #8 and #7. We live within, or just over 1 mile of all 4 proposed properties. Rezoning of these properties would have a huge impact on the entire community of Dry Creek.

Dry Creek is a small, rural community. We like it that way. That is the sole purpose of buying our homes there – to be in a rural community. It should continue to stay a small, rural community. There are no services in Dry Creek. Sidewalks and streetlights are non-existent. We travel on two lane roads that were never intended to withstand the traffic and congestion that comes with rezoning the properties.

We have generations of families in the area. The county will be essentially uprooting generational families from their rural home.

Our property values will decrease. We have spent hundreds of thousands of dollars maintaining and improving our land. We do not want to have an apartment complex filled with individuals that have no interest in preserving our way of life. They have no skin in the game as they say. They are NOT property owners and have a completely different mindset then property owners. We take pride in our neighborhood and our personal lots. I don't see that with renters.

We have many issues with the proposed rezoning and strongly oppose it. We were denied building onto our home because of a 50-foot setback we MUST adhere to. But building a 250-300 unit apartment house within ½ mile of my residence is ABSURD! The proposal is to place the apartments right up against the road, which, in of itself, is insulting. Why are the rules different for homeowners than the county? That is extremely frustrating.

Additionally, why has the county not enforced the requirement for affordable housing with the building that has been done in on Brady Lane and multiple new housing tracks that are

450-1 Cont.

being put in at Baseline and Watt Avenue. There is plenty of space there for affordable housing. There is additional space near Thunder Valley Casino and along Highway 65 corridors. That would be a great place for affordable housing.

There are no services in our area and children ride their bikes, horses and as parents we feel confident our children are safe due to the fact they are on single lane, residential area.

We also have wildlife (deer, skunks, coyotes, etc.,) that live in our rural area as well and they will be displaced.

As humans, we need green space to survive. The couple of acres on East Rd will make little difference to the requirement of Placer County.

Please do not penalize our little Dry Creek Community. Placer County is huge. Please do not REZONE the Dry Creek Community.

Brenda Timmins
Donald Timmins

916-207-6561

Brenda L. Timmins
Donald R. Timmins
8111 Stickles Lane
Roseville, CA 95747

LETTER 450: BRENDA TIMMINS

Response to Comment 450-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 451

From: Brenda Timmins
To: Placer County Environmental Coordination Services
Cc: Brenda Timmins
Subject: Rezoning Dry Creek Proposal
Date: Wednesday, March 13, 2024 12:16:48 PM

Hi – I am a resident of Dry Creek and wanted to confirm that last day to submit comments would be March 18th. Somewhere in my brain, I also have the 13th so even though the handouts say the 18th, I'd like confirmation. Thanks.

451-1 Also, there appear to be 2 properties on Vineyard that have rezoning notices. The handout only provides Vineyard as the address. Do you happen to know if the property is at the corner of Vineyard and Cook Riolo or is it the property further down Vineyard, by Brady Lane?

And finally, I drive by the property at 8830 Cook Riolo daily, and just yesterday a notice was posted about rezoning. I thought the posting should have been done some time ago. Am I mistaken?

Thank you for your response. I appreciate it.

Brenda L. Timmins
Email: BTimmins@ljdfa.com

LJ LAFOLLETTE JOHNSON
LAFOLLETTE JOHNSON, DEHAAS, FESLER & AMES
A Professional Corporation

This e-mail message may contain legally privileged and/or confidential information. If you are not the intended recipient(s), or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any dissemination, distribution or copying of this e-mail message is strictly prohibited. If you have received this message in error, please immediately notify the sender and delete this e-mail message from your computer.

LETTER 451: BRENDA TIMMINS

Response to Comment 451-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 452

From: Kristen Tinucci
To: Placer County Environmental Coordination Services
Subject: Rezoning of land off Old Auburn Rd
Date: Sunday, March 17, 2024 4:49:25 PM

I am concerned of the proposed rezoning of the area off of Old Auburn Road for the following reasons:

452-1 1. **Current traffic:** Crossing Old Auburn is dangerous. Cars exceed the posted 40 mph speed limit and often pass unsafely. Pulling out onto the road during high commute times is difficult. In particular, when parents are dropping off their kids at Sargeant Elementary School in the morning. Before Oakmont and Granite Bay High Schools begin their day and the usual morning commute (7:30-9:00 am) and afternoons when schools dismiss and commuters are done with their work day. Starting around 2:45 with the elementary school's dismissal and 5-6:30 pm are heavily trafficked timeframes. An addition of this high density housing will only increase the problem and potential for accidents.

452-2 2. **Unsafe speeds and passing:** Cars travelling eastbound unsafely pass on the right onto the bike lane or the turn lanes into Castle Creek and Woodbridge Ranch. The addition of the lights around the posted speed limit has done nothing to reduce the speeds of many drivers.

452-3 3. **Addition of 3 new developments:** These 3 areas will access Old Auburn Rd and DOES NOT INCLUDE the addition of the proposed high density housing. Wellquest Senior Living opened within the last 2 years at 9747 Sierra College Blvd and is roughly .2 miles from Old Auburn Rd. Also there is an additional senior facility Sequoia Grove on the corner of Sierra College and Old Auburn Rd soon to open. Most residents will be forced to turn right and head west on Old Auburn Rd to safely navigate the area. Finally, Woodside Homes housing development is being built on Sierra College and Lembert Dome, and the residents must turn right onto Sierra College to leave their community. There is no left turn option. If they need to head west, they will also be accessing Old Auburn Rd. All of this increased traffic and usage is NOT INCLUDING THE PROPOSED REZONING AND HIGH DENSITY PROJECT.

452-4 4. **History of accidents:** Latest accident happened in December of 2023. It involved 3 cars. There was a fatality at Cirby and Old Auburn Rd in 2021 and a prior fatality around 2006-2007 in front of Castle Creek development on Old Auburn Rd. At that time there was not enough traffic to warrant a light or stop sign. However, the number of cars and accidents have increased dramatically since that 2007 fatality, but we are still operating with no stoplights on the road from Cirby to Sierra College.

452-5 5. **Safety of children in the area:** Eich has a bus stop on Old Auburn Rd. More traffic brings more opportunities for crime. Also along Old Auburn is a pre school with parents dropping off their small children . Further, Sargeant Elementary is located off Ridgecrest and Old Auburn. Buses and cars alike have to turn from Old Auburn onto Ridgecrest. If a child wants to walk to school from Castle Creek, it is not an option as crossing Old Auburn Rd with cars traveling above 40 mph is extremely unsafe. Lastly, both Oakmont and Granite Bay High Schools use this road as well traveling to and from school. High School drivers are inexperienced, and this proves potentially dangerous for young drivers.

452-6 6. **Dangerous for bike riders and pedestrians:** Currently, walkers and joggers must cross the

452-6 cont. street without any type of stop sign or light. Again, bike riders traveling west often have to come onto the road while riding their bikes as the existing area is unsafe for bike travel with a very narrow bike lane and one lane for westbound traffic.

452-7 Thank you for your attention to this matter. We are original owners in Castle Creek Development. We have seen a lot of change in the area; unfortunately, this addition would not be positive or beneficial to those who live and access Old Auburn Road on a daily basis.

Kristen Tinucci
916-225-4895
8628 Castle Creek Drive
Roseville, Ca 95661

LETTER 452: KRISTEN TINUCCI

Response to Comment 452-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is not currently evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations do not currently constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies; the relevant information will be provided in the project staff reports and made available to the public and decision-makers.

Regarding creek concerns, please see Response to Comment 52-2.

Response to Comment 452-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 452-3
Please see Master Response 1 – Non-EIR/Administrative Issues. The proposed project does not include any site-specific development plans, so the feasibility of the site access cannot be evaluated. Regardless, if the site develops, the project applicant would be responsible for completing a transportation assessment in compliance with the County's Transportation Study Guidelines. The transportation assessment would include a detailed analysis of the project's traffic-generating characteristics and any effects of the project on the surrounding transportation network. The transportation assessment would address off-site transportation for all modes, including vehicles, pedestrians, and bicycles.

Response to Comment 452-4
Please see Master Response 4 – Traffic Safety.

Response to Comment 452-5
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 452-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 452-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 453

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: No to rezoning lots on Lincoln Way
Date: Tuesday, March 19, 2024 10:31:11 AM

From: Sheila Toner <shetoner@hotmail.com>
Sent: Sunday, March 17, 2024 3:30 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: No to rezoning lots on Lincoln Way

I oppose rezoning the following:

453-1

054-290-064-000 Lincoln Way Property 1.
Min 58 - Max 87 units

054-290-065-000 Lincoln Way Property 2.
Min 90 - Max 129 units

Both these adjourning properties should not be rezoned to allow jointly between 148 to 216 units total. The proposed Min and Max dwellings is well beyond the ability of only road access and existing community to accommodate.

Lincoln way, a two lane road, is the Only road access to/from either of these properties.
Any developments of this size should each have at least 2 exit routes available in case of emergency. These properties overlook the canyon and ASRA a potential source of wildfires coming up the Canyon

In case of fire - trying to evacuate this additional population will overwhelm the carrying capacity of Lincoln Way.

453-2

Both properties exit/entrance from Lincon Way is on a curve - limiting sight distance both for residents and cars traveling on Lincoln Way. Does not appear to be sufficient width to allow a turn lane - thus causing traffic back ups in morning and evening as residents try to exit/enter either of these lots.

Additionally, the 2 lots are less than ¼ mile from community playing field used by almost exclusively by children which fronts on Lincoln Way increasing potential pedestrian accidents.

In summary:
*Too big - too much increase in traffic for 2 lane Lincoln way.

*Increased traffic danger due to being on curve, limiting sight distance for residents entering Lincoln way and drivers on Lincoln Way.

453-2 cont.

*Without turn lane (which would require wideing road) this many additional residents would lead to traffic backup on main route for existing homes, apts. and condominium in the surrounding area.

*Only road access is Lincoln Way. Need a minimum of 2 entrances/exits - esp. in case of Fire or other emergency.

453-3

Please do not approve these properties for rezoning

Sheila Toner
shetoner@hotmail.com
13111 Thistledown Ct. Auburn

LETTER 453: SHEILA TONER

Response to Comment 453-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 453-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Responses to Comments 2-12 and 392-5. In addition, potential impacts of the proposed project related to wildfire hazards are discussed in Chapter 10, Fire Protection and Wildfire, and potential traffic safety hazards, including adequate emergency access, are evaluated in Chapter 8, Transportation, of the Draft EIR.

Response to Comment 453-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 454

From: Marjorie Larican Truppa
To: Placer County Environmental Coordination Services
Subject: Property # 26 - remove from EIR list
Date: Friday, March 15, 2024 3:49:25 PM

Hello -

454-1

While we acknowledge the importance of creating high-density, low-income housing options, it is clear that property number 26 is not the appropriate location for such a project. This area is a wetland with vernal pools that provide a habitat for federally protected species. Additionally, it is situated next to Cavitt junior high school an already high traffic area due to the school pick up/drop off and the fact that it offers public access to Folsom Lake, which lacks supervision, restroom facilities, and lifeguards.

454-2

The surrounding area already faces heavy traffic on Auburn Folsom Road, which is unlikely to improve with the addition of more residents. Fuller Drive, a two-way residential road nearby, leads to established neighborhoods of single-family homes. There is also a lack of public transportation and only one high-end grocery store in the vicinity. In addition, 2 fire stations have been shut closed in Granite Bay. The Eureka schools are already at capacity at 32+ : 1 student teacher ratio. How will the FD and schools accommodate the influx of people?

454-3

It would be illogical to introduce 1000 more residents into this area without considering the strain it would place on the existing infrastructure and the rural character of the communities. It is crucial to carefully assess the impact of such a development to avoid negative consequences for both the environment and the residents.

I implore you to remove Property 26 from Draft EIR list and do right by our community.

Concerned Citizen of Granite Bay,

Marjorie Truppa
7535 Sierra Dr
Granite Bay, Ca 95746

LETTER 454: MARJORIE TRUPPA

Response to Comment 454-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. In addition, it should be noted that impacts to biological resources are evaluated in Chapter 5, Biological Resources, of the Draft EIR. Please also see Response to Comment 52-2.

Response to Comment 454-2

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 6 – Impacts to Local Schools. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is not currently evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations do not currently constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies; the relevant information will be provided in the project staff reports and made available to the public and decision-makers.

Regarding the commenter's fire station comment, it is noted that South Placer Fire Protection District Station 17 is located on Eureka Road, less than 500 feet from Site 26, and is fully operational.

Response to Comment 454-3

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 455

March 6, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

My name is Marjorie Truppa. I am a Placer County resident with an address at 7535 Sierra Drive Granite Bay, CA 95746.

455-1 In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I would like to respectfully request the Board of Supervisors reject the Housing Element Amendment and accompanying Appendix F, and furthermore remove Site 26 from the proposed rezone program.

In addition, I am writing in support of the letter written by Granite Bay Village Community Member, Jaclyn Freeman, dated March 6, 2024. I respectfully request the Board consider the concerned expressed therein as an extension of my own opinion.

Thank you for your time.

Marjorie Truppa

LETTER 455: MARJORIE TRUPPA

Response to Comment 455-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 456

From: Linda Turner
To: Placer County Environmental Coordination Services
Subject: High density build
Date: Saturday, March 9, 2024 8:32:27 AM

456-1

I would like to voice my opposition to the building of the high density four story apartments near the corner of Auburn Folsom Road just below Cavitt junior high. This is not an appropriate area for high density building. The infrastructure is already about at its limit. To my knowledge there has not been an EIR performed at this point. It seems that you are rushing this project. The proposed density of this project would definitely put a strain on the quality of life in this area. The amount of traffic coming down to Auburn Folsom Road from Folsom onto Douglas is already horrendous. This has been considered a rural area since I moved here in 1977. More and more building has been allowed pushing out much of our wildlife. There is very little room left for them and very few open spaces left in Granite Bay. Please reconsider this project and at least take the time to study it more thoroughly.

Sincerely,
Linda Turner
Sent from my iPad

LETTER 456: LINDA TURNER

Response to Comment 456-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 5 – Programmatic EIR vs. Site-Specific EIR. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is not currently evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations do not currently constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies; the relevant information will be provided in the project staff reports and made available to the public and decision-makers.

Project-related traffic and potential traffic safety hazards are programmatically evaluated in Chapter 8, Transportation, of the Draft EIR.

Letter 457

From: Aaron Linden
To: Placer County Environmental Coordination Services
Subject: High density low income housing in Placer county
Date: Monday, March 18, 2024 3:58:55 PM

457-1

I was born and raised in Newcastle. I have spent a majority of my life in Placer county and have always loved where I grew up. When my wife and I bought the property we now own it was with the understanding that we were close enough to town to make quick trips to the store, the auto shop, the gas station, but also far enough away that we could live a semi rural life with our children. I spent a few years living in Sacramento county, then in Citrus Heights, in residential neighborhoods, and I moved back to the Auburn area specifically to avoid high population areas. I grew up a rural foothill boy and could not stand living in the city. I work in Sacramento county where there are many high density population areas. I see the crime, the litter, the homelessness, the drugs, and all the other negative aspects that low-income, high density housing brings. Since we've moved to our house 10 years ago we have already had to deal with homeless people trying to camp on and next to our property, theft from our vehicles and our carport, including a bicycle that I had bought less than 6 months before, as well as gas siphoned from our vehicles. There is a halfway house on the street behind our house where sexual deviants are kept. These people have walked by our house and ogled our children in our yard and who knows what would have happened if we hadn't been there to stop them. They have stopped in the property next to ours to sit and drink beer and I have had to chase them off. Even with these problems we still enjoy our property and have stayed because of the feeling of a rural area. We have been forced though, due to the crime and fear for our family and belongings, to fence our entire property and put up cameras to monitor our house and belongings. I believe it would be a mistake to implement high density, low income housing in the rural parts of Placer county as much of the draw for people to come live in our beautiful county is to get away from these city problems. My wife and I both have to commute to Sacramento where we can make enough money to live where we do, I find it to be a privilege to live in the rural areas of Placer county. On top of all the other issues with high density low income housing, there is not enough work in Auburn, not enough jobs here to sustain a larger population and I feel it would be a burden to the county. I hope more of my neighbors feel the same way and have the courage to speak out and fight against this matter that will certainly affect us all.

Yahoo Mail: Search, Organize, Conquer

LETTER 457: AARON UNDEN

Response to Comment 457-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 458

From: Susan Unden
To: Placer County Environmental Coordination Services
Subject: Land
Date: Monday, March 18, 2024 4:44:07 PM

458-1

I've been a resident of Place Co. for over 50 years, the last 47 of which were spent living in our current home in Newcastle. I've raised 5 children here and now enjoy watching 3 of my Grandchildren play On the same rocks and swing in the same trees and on the bars of the barn that their parents swung on as children. It's a quiet rural life, exactly like we wanted. There's no car's honking, there's no gunshots fired and it's relativity safe. Crowding people like rats in a maze causes anger, frustration and descension. There is not enough work available to support the plans you are making. What happens when you move low-income people here and they cannot take care of their homes and find jobs to support themselves? Please choose wisely.

LETTER 458: SUSAN UNDEN

Response to Comment 458-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 459

From: Del Valadez
To: Placer County Environmental Coordination Services
Subject: 3865 Old Auburn Rd - DEIR Public Comment
Date: Monday, March 18, 2024 1:51:11 PM

To Whom It May Concern,

459-1 I'm writing in regard to the Housing Rezone Program Draft Environmental Impact Report. I work in Granite Bay but I do not live in Granite Bay or even close to Granite Bay because I can't afford to. Average people like myself have been priced out of the community and are forced to commute. Affordable, or even just, reasonably priced housing would allow me to live in the city where I work so I am in support of this development.

Hopefully Someday a Placer County Resident,

Del Valadez

LETTER 459: DEL VALADEZ

Response to Comment 459-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 460

From: Oskar Vierny
To: Placer County Environmental Coordination Services
Cc: desinauburn@gmail.com
Subject: Re: Housing Needs Rezone Program - Site 34 at Canal Street, Auburn.
Date: Friday, March 15, 2024 12:40:47 PM

Attn: Shirley Herrington

Hello Shirley,

460-1 My name is Oskar Vierny and I own the property at 12308 Hidden Meadows Cir, Auburn. It also happens to be our residence - my wife and I lived here for almost 6 years, since we moved from the Bay Area. We enjoy the quiet and lovely neighborhood - you can hear the birds singing, have a nice walk with my dog, not to mention the (lack off) traffic - so different from where we used to live before. I understand that all this is going to change. I am trying to comprehend the scope of change and how it is going to affect us, the neighbors.

460-2 After studying the materials on the Placer County website, I have a few questions regarding the Program - I hope you can enlighten me with your answers.

460-3 Looking at the map on page 40 of the proposed development site, I see a long and narrow "panhandle" reaching all the way to Canal Street - is this going to be the main access road to this development? What other roads will be leading to the site and which of the streets / roads will be affected by the additional traffic?

460-4 There is a natural drainage located between 12300 and 12301 Hidden Meadows Cir, that drains the storm water into Site 34. Hidden Meadows Cir. has a west-bound slope, a lot of water is coming down that way, during the storm season. How will this drainage be affected by the proposed development?

460-5 There is a beautiful oak grove in the north-eastern corner of Site 34 - will those trees be preserved as part of the development?

460-6 Last but not least, since the development will have multi-family housing and population density much higher than the current average, will the developer be required to build a sound protection wall, to maintain the quietness and privacy of the neighboring properties?

460-7 Thank you in advance for your time. I hope you can answer my questions or point me to the pertinent section of the website, where I can find the answers.

Respectfully,

Oskar Vierny

Owner, 12308 Hidden Meadows Cir, Auburn 95603.

LETTER 460: OSKAR VIERNY

Response to Comment 460-1
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 460-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 460-3
The proposed project does not include any site-specific development plans, designs, or proposals at this time. As such, proposed ingress/egress points do not currently exist for the rezone sites. Future development proposals would be reviewed by the serving fire department or district for adequate access to individual sites. However, all new developments that occur within the County would be required to comply with all applicable design standards as part of constructing or modifying the transportation system. For example, Policy 3.A.2 of the Placer County General Plan requires all streets and roads to be constructed in accordance with General Plan, community plan, and specific plan standards.

Response to Comment 460-4
Please see Master Response 1 – Non-EIR/Administrative Issues. It should be noted that potential impacts to stormwater drainage are discussed in Section X, Hydrology and Water Quality, of the Initial Study prepared for the proposed project. Furthermore, Mitigation Measures X-1 and X-2 of the Initial Study require preparation of a Final Drainage Report prior to the approval of each future development project. In general, the Final Drainage Reports would specify the existing conditions of each rezone site, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from each project, as well as water quality protection features and methods to be used during construction, and long-term post-construction water quality measures.

Response to Comment 460-5
Project-related impacts to biological resources are programmatically evaluated in Chapter 5, Biological Resources, of the Draft EIR. The proposed project does not include any site-specific development plans, designs, or proposals at this time. As such, the extent of future impacts to oak woodlands cannot be known at this time. Any impacts to oak woodlands on sites within the Placer County Conservation Program (PCCP) area would be subject to compliance with the PCCP, for which land conversion fees would be required for any impacts to oak woodlands. Any impacts to oak woodlands on sites outside of the PCCP area would be subject to compliance with the Placer County Interim Guidelines for Evaluating Development Impacts on Oak Woodland, which would require payment of fees for oak woodland conservation consistent with Chapter 19.50 of the Placer County Code, the purchase of off-site conservation easements, or a combination of payment to the Tree Preservation Fund and creation of an off-site Oak Preservation Easement. Fees are used by the County to set aside similar habitat within dedicated preserves to be strategically located throughout the County.

Response to Comment 460-6

Potential impacts related to noise and vibration associated with construction and operation of future development associated with the proposed project are programmatically addressed in Chapter 7, Noise, of the Draft EIR. Please also see Response to Comment 200-5.

Response to Comment 460-7

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 461

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: HE-1 Site 26
Date: Tuesday, March 19, 2024 8:34:34 AM

From: Kimberly Vincent <kvincent@surewest.net>
Sent: Friday, March 15, 2024 8:55 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Suzanne Jones <SuzanneJones@placer.ca.gov>
Subject: HE-1 Site 26

DearSr. Planner Kally,

I'm writing to you today about the proposed Housing Element Program (HE-1), and more specifically the Draft EIR, which lists Site #26 in Granite Bay as a top choice to place hundreds of 'low income' & 'very low income' multi-family housing. https://www.placer.ca.gov/DocumentCenter/View/77692/Housing-Element-Appendix-F?bidId=). This site is 17 acres on the corner of Fuller Drive and Auburn Folsom Road (8989 Auburn Folsom Road).
Respectfully, for the safety of ALL current and future citizens in Granite Bay and Placer County, this site needs to be REMOVED from the candidate list immediately.

As a citizen of Granite Bay living directly across the street from this proposal, as well as someone who has children in the local school system, I'd like to share grave concerns about this proposal, and why the entire community of Granite Bay does not think this is in the best interest of anyone in Placer County:

#1 SAFETY
a) **Placing 'very low income' housing bordering a SCHOOL is incredibly reckless and will absolutely lead to an increase in crime.** It appears there is no consideration for the safety and well-being of the children who attend Cavitt Middle School.

461-1

b) An increase in crime and deterioration of Cavitt will undoubtedly lead to a downgrade in the school's ranking as well.

c) Auburn-Folsom Rd functions like a highway, with cars easily going 60-70mph on a regular basis. Where are the kids who would live in this proposed development going to play? The answer is on and around Auburn-Folsom, and **you will sadly see an increase in fatalities along the corridor, many of whom likely will be children.** This again is beyond reckless.

#2 LACK OF INFRASTRUCTURE
a) **Auburn-Folsom Rd is not equipped to handle the additional presence of hundreds of cars a day at the intersection with Fuller Drive.** What is already jammed every single morning will turn into utter chaos, which will then require additional law enforcement resources that the county simply does not possess.

b) **We do not have the proper resources to handle adding hundreds of residents at Site #26.** There's no close access to hospitals & other essential needs, and adding 'very low

income' housing into an area already stretched thin is not setting up anyone for success, but rather is penalizing everyone. It doesn't support the citizens of Granite Bay.

461-1 Cont.

c) **There is no Public Transportation locally available to accommodate this.** How are 'very low income' residents expected to commute/find reliable transportation, and to what jobs are they commuting to? The local area does not have a surplus of jobs.

d) **San Juan Water District is not prepared for this kind of increase in dwellings.** Living in the direct area of proposed site #26, we are already experiencing a lack of water pressure. After numerous calls and visits from San Juan Water District, my neighbors have been informed that the is no direct issue causing the low pressure, other than "no one consulted with San Juan when they built all these houses on Eureka/Auburn Folsom and there isn't enough water pressure for everyone."

461-2

#3 ENVIRONMENTALLY IRRESPONSIBLE & POTENTIALLY UNLAWFUL

a) **Multiple protected species, including the Golden Eagle, utilize this parcel of land.** We are also of the belief that the proper environmental studies were not conducted. CDFW has been informed of this.

b) **Linda Creek (which would be severely impacted by this project) is home to protected salmon that swim upstream to spawn.**

461-3

c) The state's VERY OWN CRITERIA specifically notes that the **housing program is not intended for larger sites in excess of 10 acres**. This isn't even close even with adding in a buffer zone around the creek.

Sr. Planner Kally, I respectfully ask that you move to join Supervisor Jones and remove Site #26 from the list of candidate sites.
Please do the right thing by the very people you were elected to serve. We will pursue this from every angle possible, including legal action if required, to ensure that OUR community is safe.

Thank you for your time and consideration.

Sincerely,
Kim Vincent

LETTER 461: KIM VINCENT

Response to Comment 461-1
Please see Responses to Comments 422-1 through 422-7.

Response to Comment 461-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 461-3
Please see Responses to Comments 422-8 through 422-11.

Letter 462

From: Ron Volle
To: Board Clerk; Placer County Environmental Coordination Services
Cc: defendgb@gmail.com; pneifer@gmail.com; delnofamily@aol.com
Subject: Housing Element High Density RM-30 rezoning in Penryn, Ca.
Date: Thursday, February 22, 2024 9:26:18 AM

462-1

Supervisors & Planning staff: I've been a vocal opponent of the high density rezoning attempts by the County in our rural community of Penryn. I've heard so many comments from Placer county officials including " the state is forcing us to do this ", " this is caused by the rapid growth in west Roseville ", " we don't have any other land opportunities" " we didn't plan for affordable housing in west Roseville " etc. There is a 20+ acre land site for sale on Taylor Rd. by the Newcastle tunnel and their downtown community that backs up to the railroad tracks. There is a current project going thru an EIR in West Roseville called Creekview Ranch that is planning 600 homes on 185 acres. Here is the opportunity to add high density housing to a big developer's project. But will the Supervisors do it? Probably not as they will let the big developers build homes there and force Penryn to absorb the consequences of big development.

Penyn does not have the SOCIAL infrastructure to accommodate 500-1,000 apartment families. Penryn does not have sidewalks & street lights for kids to ride bikes on, Penryn does not have restaurants to choose from, Penryn does not have local jobs and offices to go to , Penryn does not have retail services nearby, no medical facilities, no parks, no local grocery stores, no libraries, no real fire protection for typical apartment buildings, no police force nearby. If you approve this project you are forcing the apartment families to have 2+ cars and make them get in and travel by car for any needs they may have. The planned affordable project next to the gas station and Hwy. 80 is a VERY poor location due to the freeway air quality and lack of services and being land locked on Penryn Rd. You are essentially creating a " drive-out " community.

I met with the Developer of the proposed 240 apartment project; and he replied to my question of why with " It's part of my legacy ".

To me a legacy would create a win-win situation, not a lose-lose outcome. Please do the right thing and put affordable housing in populated areas where the required services and amenities are nearby, bot for the sake of the residents and the benefits to the local community.

Ron Volle
Penryn resident 916-335-3050

LETTER 462: RON VOLLE

Response to Comment 462-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 463

March 18, 2024

Castle Creek Homeowners Association

Placer County Community Development Resource Agency
Zoning change at 3865 Old Auburn Rd.

Board Members:

463-1 As board members and residents of the Castle Creek subdivision, we have noticed the proposed zoning change at 3865 Old Auburn Rd. We have learned that you desire to change this 4.8 acre lot into high density multi-family housing with 96-144 units. We, as a board, representing our neighborhood, are against this zoning change. Several reasons we believe should be further considered.

463-2 **Traffic:** This neighborhood will be 25 years old this July, and as such, we have seen the traffic increase drastically on Old Auburn Rd. Not only has the number of vehicles increased, but the speed and lack of traffic control on this straight stretch of road has become dangerous. Trying to leave our neighborhood we not only have to deal with these, but need to watch out for the drivers that use the right side of the road as another lane. This roadway is only one lane with a very wide right side. It is regularly used as a passing lane. There is also no center turn lane to enter and merge West bound onto Old Auburn. There are only dedicated left turn lanes to turn onto Castle Creek Dr. or onto Ridgecrest Way. This lack of center turn lane also affects the Huntington Oaks subdivision when they turn East onto Old Auburn.

463-3 **Student and pedestrian safety:** Elementary school students going to Sergeant Elementary School on Ridgecrest Way have no traffic controls or crossing guards to assist them cross the street. Eich Middle School has their bus stop for their students on the sidewalk on Old Auburn. Numerous fitness walkers cross Old Auburn to walk to Maidu Park. The addition of more cars and speed only increase the danger to these pedestrians and students.

463-4 **Project not in line with the residential area:** Just a glance will tell you that this is a single family area and the thought of adding something this size would be out of proportion not only to the existing area, but an added eyesore. With the exception of two retirement centers, there are no apartments in the area. The out of place apartments along with their added vehicles, 96-144, or a more realistic two vehicles per unit would be 192-288 extra cars in the area. This extra volume with their unchecked speed and noise reduces the quality of life for the entire area along with increased dangers for students, walkers, and

463-4 cont.

bicyclists. A project this size is just out of proportion for a single family area. More appropriately, this type of development should be nearer to commercial areas and shopping complexes. Twenty to thirty apartments per acre means three story buildings are needed to accommodate the proposed size. Anyone should be able to see that this proposed zoning change would have significant detrimental impact on the surrounding subdivisions.

463-5

Quality of life: It is inevitable that infill projects will occur but what is determined will affect our community and the surrounding communities as well. Open areas built over and paved will increase noise, harm vernal pools, and increase polluted runoff into Linda Creek. Two or three story apartments not only would be out of place, but would be inconsistent with our existing single family neighborhoods. Prospective buyers looking for a family home could be discouraged from buying in the area due to a very large apartment across the street from where they wish to buy. There are no multi-family apartments and there should not be any built in this area.

463-6

We, the board of directors representing the residents of Castle Creek, are opposed to the zoning change proposed for the lot at 3865 Old Auburn Rd. The density change proposed in this zoning change is too large for this single family area.

Respectfully,

Brian Wall
President, Castle Creek Homeowners Association

Members;

Michelle Larson
Stuart Nelson
Blair Halliday
Jacob Hilderbrand

LETTER 463: BRIAN WALL

Response to Comment 463-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 463-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is not currently evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations do not currently constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies; the relevant information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 463-3
Please see Master Response 4 – Traffic Safety.

Response to Comment 463-4
Please see Response to Comment 463-2.

Response to Comment 463-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. Regarding Linda Creek, it is noted that PCCP Section 3.2.7 Stream System provides that Linda Creek is designated as a named USGS blueline stream, and thus, the Stream System is any area within the FEMA 100-year floodplain or 100 feet from the Ordinary Highwater Mark of Linda Creek whichever is greater. Any work within the subject parcel would be required to comply with PCCP Stream System Condition 1, as required by Mitigation Measure 5-4(j) of the Draft EIR.

Response to Comment 463-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 464

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Public safety concerns for rezoning
Date: Tuesday, March 19, 2024 10:56:35 AM
Attachments: Outlook-4zvzp1te.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:06 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Public safety concerns for rezoning

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: James Wallace <jwallaceff@yahoo.com>
Sent: Monday, March 4, 2024 9:53 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Public safety concerns for rezoning

Hello Representative Dahlgren. I hope you are well and thank you in advance for taking the time to read my email and I hope you will give it some thought.

464-1 As I'm sure you are aware, we in the Dry Creek Community in district 1 are staunchly opposed to rezoning parcels within our rural community to accommodate apartments or other medium to high density units.

464-2 A little background on me, I have been a firefighter for the past 18 years and a paramedic for the past 17 years. It is true that building apartments or condominiums

464-2 cont.

in our rural community doesn't make any more sense than building a hog farm in the middle of Roseville. However, I want to talk about public safety. The roads here our community, mainly but not limited to Vineyard, Cook Riolo, Central and East were not designed to handle the kind of traffic that these high density properties would bring. Our community has one fire station that is staffed with EMTs. I have spoken with the Battalion Chief in charge of that station and he said that they have the approval to hire paramedics but have been repeatedly unsuccessful in doing so. Additionally, they are planning for another fire station out off Watt Ave which will I'm sure have their hands full with the 10s of thousands of homes slated to go out there.

464-3

Speaking specifically about the parcel on Vineyard Rd, I know you are intimately familiar with how dangerous that road is for drivers let alone for bicyclists and god forbid, children walking to and from school. Vineyard is two lanes with no sidewalk and no shoulder to walk on, and no way of building a sidewalk between those properties and Creekview Ranch School, where all of those children would be walking or riding their bikes to. I don't have to tell you how dangerous that street is. We had a pedestrian fatality there last week and I'm sure you remember those three young men who lost their lives near Vineyard and Cook Riolo last year.

464-4

Before you cast your vote to approve the rezoning of these properties, I implore you to take your staff for a walk from the property on Vineyard all the way to the school at 7:50 in the morning on a school day and then back again at 2:30.

464-5

As for the property on Cook Riolo across from the school, please drive down Cook Riolo in the morning and the afternoon and see the volume of traffic that just sits on Cook Riolo from Baseline all the way back to the school and onto school property. That road is not equipped to handle any more vehicles, especially directly across the road.

And for The property on East and Central, that would ruin the rural feel of our neighborhood. Right now, in the afternoon, you can drive slowly down Central and wave to kids riding on horseback down the road. If you add hundreds of units to that property, it will no longer be safe for people to ride horses as people living in an urban environment tend to drive faster and do not heed the right of way to those on horseback.

464-6

Lastly, but not public safety related, our community is built on the rural lifestyle. We are living in the house that my wife grew up in. She is the community leader of the same 4-H chapter that she participated in when she was little. Our kids raise pigs and goats and sheep and chickens for market projects for 4-H. All of those things bring flies, even with the utmost attention to cleaning and animal husbandry. People moving in to an apartment or condominium complex do not understand the rural lifestyle and we can anticipate complaints about flies and the smell of pigs and the sound of roosters crowing. One of the proposed parcels has a retired rodeo bull living right next door. He got out of containment the other day and jumped the fence onto a neighboring property. Could you imagine if he jumped the fence onto the apartment grounds?? Children could honestly die. Unfortunately despite the best of efforts, animals do get out.

464-7 I have taken up enough of your time. I truly do appreciate you reading this and I hope you do take some time and think about what adding high density housing into a community that was not designed for it would do. Thank you

James Wallace
916-622-8080

LETTER 464: JAMES WALLACE

Response to Comment 464-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 464-2
Please see Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is not currently evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations do not currently constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies; the relevant information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 464-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 464-4
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 464-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 464-6
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 464-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 465

From: James Wallace
To: Placer County Environmental Coordination Services
Subject: Housing sites rezone opposition
Date: Thursday, March 14, 2024 12:59:14 PM

Hello. My name is James Wallace and I live in the Dry Creek Community in District 1. I read the Housing Element Amendment Appendix F last night and I'd like to chime in on Lots 7 and 8.

465-1 In Appendix F, page F 15, lots 7 and 8 are listed as a "10" and "8" respectively for transportation availability and are both a "10" for infrastructure. This merely takes into account the proximity to public transportation and grocery stores. This does not however, take into account what children those without an automobile would have to do to get to those bus stops and grocery store or even to school. Both of these properties are on two lane country roads (lot 8 when going to Creekview Ranch School via Central Ave) with no shoulder and no sidewalk. I live off of Vineyard 1 block from lot 7 and I forbid my children from walking or riding their bikes on Vineyard because there is no shoulder and no sidewalk or bike lane. Traffic routinely travels in excess of 60 mph and ignore the stop sign at Eva Lane. Earlier this month, there was a hit and run auto vs. pedestrian fatality less than 100 yards from lot 7 on Vineyard Rd. And last year, three young adults were killed when their car crashed at high speed into a power pole on Vineyard Rd.

465-2 As for lot 8 on East Ave, the children will have to walk or ride their bikes down Central Ave to get to school. Central Ave again has no shoulder or sidewalk or bike lane. We have friends who live off Central who's children attend Creekview Ranch and they routinely get phone calls at the last minute in the morning informing them that there is no bus service that morning leaving them scrambling to get their kids to school while the parents are trying to get to work. In low income multi unit housing, you will have many house holds that have only one parent or both parents that have to work. This will leave the children having no choice but to walk or ride their bikes down these treacherous country roads.

465-3 Additionally, on the subject of infrastructure, the appendix mentions the availability of sewer and water in the nearby neighborhoods in consideration for the "10" rating. This sounds great for the developments but this is terrible for those of us who live out here and are on septic systems. According to the County of Placer On-Site Sewage Manual, Chapter 2 on Connection to Public sewer, this means that any property within 300 feet of a public sewer connection would be unable to pull a future permit to fix or expand their septic system. They would be required to pay to connect to the public sewer system which I looked into could cost the homeowner as little as $35,000 and as much as $80,000 depending on how far they are from the sewer connection. This means that no existing homes can to bathroom additions and more importantly, they would be unable to apply to build an ADU to keep our older generations at home with us, as the county has previously stressed as a priority.

Thank you. Please feel free to reach out to me with any concerns.

James Wallace
916-622-8080

LETTER 465: JAMES WALLACE

Response to Comment 465-1

The ranking criteria was used to demonstrate the proximity to transportation. Sidewalks would be constructed with future development. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 465-2

It should be noted that Site #8 is located approximately two miles from the school, which exceeds the typical walking distance of 0.25- to 0.5-mile for transportation purposes. Therefore, the likelihood that children who may reside at Site #8 would walk to school is low. Nevertheless, Chapter 8, Transportation, of the Draft EIR analyzed whether the proposed project would conflict with an existing program, plan, ordinance or policy for the bicycle, pedestrian, and transit system under Impact Statement 8-2. The impact was found to be less than significant.

Response to Comment 465-3

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 466

From: Lindsey Wallace
To: Placer County Environmental Coordination Services
Subject: Dry Creek Community Rezone Opposition
Date: Monday, March 18, 2024 3:21:22 PM

> Hello. My name is Lindsey Wallace and I live in the Dry Creek Community in District 1. I read the Housing Element Amendment Appendix F last night and I'd like to chime in on Lots 7 and 8.
>
> In Appendix F, page F 15, lots 7 and 8 are listed as a "10" and "8" respectively for transportation availability and are both a "10" for infrastructure. This merely takes into account the proximity to public transportation and grocery stores. This does not however, take into account what children those without an automobile would have to do to get to those bus stops and grocery store or even to school. Both of these properties are on two lane country roads (lot 8 when going to Creekview Ranch School via Central Ave) with no shoulder and no sidewalk. I live off of Vineyard 1 block from lot 7 and I forbid my children from walking or riding their bikes on Vineyard because there is no shoulder and no sidewalk or bike lane. Traffic routinely travels in excess of 60 mph and ignore the stop sign at Eva Lane. Earlier this month, there was a hit and run auto vs. pedestrian fatality less than 100 yards from lot 7 on Vineyard Rd. And last year, three young adults were killed when their car crashed at high speed into a power pole on Vineyard Rd.
>
> As for lot 8 on East Ave, the children will have to walk or ride their bikes down Central Ave to get to school. Central Ave again has no shoulder or sidewalk or bike lane. We have friends who live off Central who's children attend Creekview Ranch and they routinely get phone calls at the last minute in the morning informing them that there is no bus service that morning leaving them scrambling to get their kids to school while the parents are trying to get to work. In low income multi unit housing, you will have many house holds that have only one parent or both parents that have to work. This will leave the children having no choice but to walk or ride their bikes down these treacherous country roads.
>
> Additionally, on the subject of infrastructure, the appendix mentions the availability of sewer and water in the nearby neighborhoods in consideration for the "10" rating. This sounds great for the developments but this is terrible for those of us who live out here and are on septic systems. According to the County of Placer On-Site Sewage Manual, Chapter 2 on Connection to Public sewer, this means that any property within 300 feet of a public sewer connection would be unable to pull a future permit to fix or expand their septic system. They would be required to pay to connect to the public sewer system which I looked into could cost the homeowner as little as $35,000 and as much as $80,000 depending on how far they are from the sewer connection. This means that no existing homes can to bathroom additions and more importantly, they would be unable to apply to build an ADU to keep our older generations at home with us, as the county has previously stressed as a priority.
>
> Thank you. Please feel free to reach out to me with any concerns.
>
> Lindsey Wallace
> 916-622-8832
Sent from my iPhone

466-1

LETTER 466: LINDSEY WALLACE

Response to Comment 466-1

Please see Responses to Comment Letter 465.

Letter 467

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30
Date: Tuesday, March 19, 2024 10:58:35 AM
Attachments: Outlook-cukdzntl.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:13 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Lindsey Wallace <lindseycwallace@yahoo.com>
Sent: Sunday, March 17, 2024 6:51 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Opposition to Proposed Rezoning in Dry Creek Rural Community General Amendment To RM-30

Dear Members of the Planning Department,

467-1

I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

467-1 cont.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning.

Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Sincerely,
Lindsey Wallace
Sent from my iPhone

LETTER 467: LINDSEY WALLACE

Response to Comment 467-1

Please see Responses to Comment Letter 115.

Letter 468

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:06:38 AM

-----Original Message-----
From: Lindsey Wallace <lindseycwallace@yahoo.com>
Sent: Friday, March 8, 2024 11:29 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element and the proposed rezoning for properties across Placer County.

1) The major new developments in District 1 have not been made to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall) this also leads to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing);

2) The places that have been chosen in Districrr 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems not manageable for them;

468-1

3) The criteria that the county used to seek out sites for rezoning were relatively random (the idea of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch (Property which feeds the local community is hardly "underutilized." The idea that it has to be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement her attorneys were able to make with the city of Clovis And the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going (posting the signs on a Friday night before a Tuesday meeting which was reviewing it is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable). Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1.

For these reasons I believe that Placer County should take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Thank you.

Lindsey Wallace
916-622-8832

Sent from my iPhone

LETTER 468: LINDSEY WALLACE

Response to Comment 468-1

Please see Responses to Comment Letter 62.

Letter 469

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:06:14 AM

From: James Wallace <jwallaceff@yahoo.com>
Sent: Friday, March 8, 2024 11:20 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Placer County Staff and HCD Staff,

I am writing to express 4 concerns about the Placer County Housing Element and the proposed rezoning for properties across Placer County.

1) The major new developments in District 1 have not been made to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall) this also leads to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing);

2) The places that have been chosen in Districrr 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems not manageable for them;

469-1

3) The criteria that the county used to seek out sites for rezoning were relatively random (the idea of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch (Property which feeds the local community is hardly "underutilized." The idea that it has to be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement her attorneys were able to make with the city of Clovis And the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going (posting the signs on a Friday night before a Tuesday meeting which was reviewing it is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that

4609-1 cont.

actually are viable). Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1.

For these reasons I believe that Placer County should take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Thank you.

James Wallace
916-622-8080

LETTER 469: LINDSEY WALLACE

Response to Comment 469-1

Please see Responses to Comment Letter 62.

Letter 470

From: sashawarren@wavecable.com
To: Placer County Environmental Coordination Services
Subject: Site #26 - Housing Element Sites Rezone Project
Date: Friday, March 15, 2024 2:49:42 PM

Hi there,

470-1 I am writing to voice my concern regarding rezoning Site #26 in Granite Bay. As a GB resident with a child at Cavitt Junior High, I cannot imagine the horrendous impact on traffic at Fuller Drive that would result from converting this land to contain a minimum of 348 housing units! Currently, during the standard pick-up and drop-off times for school, traffic backs up on Fuller Drive and sometimes spills to Auburn-Folsom Road. If I have read the report correctly, no driveway will be provided to this housing development on Auburn-Folsom Road because it is an arterial road. That would mean the minimum of 348 cars added to this site would be using Fuller Drive, contributing to congestion.

470-2 Furthermore, many students visit the shopping center across Fuller Drive after school. There is no crosswalk across Fuller Drive directly across from the school, meaning students must walk down Fuller to the crosswalk at Auburn-Folsom Road. This would have students walking across a potentially busy driveway to get to the intersection. This is dangerous for the kids and further leads to congestion on Fuller Drive, as cars will likely stack up on Fuller while waiting to get into the driveway.

470-3 To be clear, I understand the difficult position the county has been put in by the state mandate. Consequently, I am not opposed to some housing going on this site. However, considering its proximity to a very busy school site, the addition of 348-522 units at this location seems like a horrible idea. Could this site be used as a mixed housing zone, thereby limiting the total number of units, minimizing the traffic impacts to residents? I hope county supervisors will consider an alternative plan for this site.

Thank you,
Sasha Warren
Granite Bay Resident

LETTER 470: SASHA WARREN

Response to Comment 470-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 470-2
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. Additionally, it should be noted that the County has secured grant funding to install a new enhanced crosswalk for pedestrians crossing Fuller Drive near Cavitt Junior High School. The grant funding is unrelated to the proposed project and will be installed whether or not Site #26 is rezoned as part of the proposed project. The new crosswalk could alleviate the concerns raised by the commenter.

Response to Comment 470-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 471

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: District 1 rezoning
Date: Tuesday, March 19, 2024 10:56:24 AM
Attachments: Outlook-bwzkiec.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:06 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: District 1 rezoning

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Craig Watts <wattsbuildingco@gmail.com>
Sent: Monday, March 4, 2024 5:50 AM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: District 1 rezoning

471-1

Dear Members of the Planning Department, I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and

wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

471-1 cont.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning. Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Regards

Craig Watts
Owner
Watts Building Co.
916-390-8741
Wattsbuildingco@gmail.com
wattsbuilding.com

LETTER 471: CRAIG WATTS

Response to Comment 471-1

Please see Responses to Comments 115-1 through 115-7.

Letter 472

From: Craig Watts
To: Placer County Environmental Coordination Services
Subject: Re: Dry creek district 1 rezoning proposal
Date: Friday, March 8, 2024 2:46:14 PM
Attachments: image002.png

472-1 Hi upon my review it looks as all of these properties have been lumped together under 1 environmental review. Where is the review for each individual Property. Per CEQA there is so much information to sift through I request an extension to review this. This looks piece milled together and I need more time to review

Regards
Craig Watts
Owner
Watts Building Co.
916-390-8741
Wattsbuildingco@gmail.com
wattsbuilding.com

On Tue, Mar 5, 2024 at 11:47 AM Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov> wrote:

> Thank you for your interest in the subject project and for taking the time to provide comments. This is to confirm that your comments have been received. Also, you are now on our master email and/or USPS distribution list for the subject project and, as such, you will receive updates and notifications of future opportunities for participation and input.
>
> Thank you,
>
> **Meghan Schwartz, CDRA Technician**
> Community Development Resource Agency
> 3091 County Center Dr, Suite #190
> Auburn, CA 95603
> (530) 745-3075
> mschwartz@placer.ca.gov

From: Craig Watts <wattsbuildingco@gmail.com>
Sent: Friday, March 1, 2024 1:18 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Dry creek district 1 rezoning proposal

Dear Members of the Planning Department, I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

472-2

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

472-2 cont.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning. Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Regards

Inline image

Regards
Craig Watts
Owner
Watts Building Co.
916-390-8741
Wattsbuildingco@gmail.com
wattsbuilding.com

LETTER 472: CRAIG WATTS

Response to Comment 472-1

Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Response to Comment 472-2

Please see Responses to Comments 115-1 through 115-7.

Letter 473

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Dry creek district 1 rezoning proposal
Date: Friday, March 1, 2024 2:56:37 PM

From: Craig Watts <wattsbuildingco@gmail.com>
Sent: Friday, March 1, 2024 1:18 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Dry creek district 1 rezoning proposal

Dear Members of the Planning Department, I am writing to you as a concerned resident of the Dry Creek area in Roseville, California (ZIP Code 95747), to express my strong opposition to the proposed rezoning of several properties to allow for high-density, low-income housing developments of 20-30 units per acre. The unique character and way of life in our rural community are under threat by such a drastic change, and I urge you to reconsider the proposal for the following reasons:

1. Incompatibility with Rural Character: The Dry Creek area is characterized by its rural charm, with properties typically having a minimum of two acres. This open space is not only aesthetically pleasing but also contributes to a unique lifestyle that residents have chosen and wish to maintain. Introducing high-density housing would irreversibly alter the landscape and environment we hold dear.

2. Infrastructure Strain: Our local infrastructure, including roads, water supply, and sewage systems, was designed to support a low-density population. Increasing the population density could lead to significant strains on these systems, leading to a decline in service quality and increased maintenance costs that may not be fully accounted for in the development plans.

473-1

3. Environmental Impact: High-density housing could potentially have negative environmental impacts, such as increased pollution, loss of wildlife habitats, and reduced green spaces. These changes would not only affect the quality of life for existing residents but also contradict the broader community's commitment to environmental stewardship.

4. Traffic and Safety Concerns: The rural roads in Dry Creek are not built to accommodate high traffic volumes. The increase in traffic associated with high-density housing could pose safety risks and contribute to congestion, negatively impacting the daily lives of residents and the safety of our roads.

5. Community Resources: Our local schools, emergency services, and other community resources are calibrated to support a rural population. A sudden increase in population density could overwhelm these resources, potentially lowering the quality of education, increasing emergency response times, and placing a greater burden on community services.

I understand the need for affordable housing in our region, but I believe that such developments should be carefully planned and located in areas where they can be supported by the appropriate infrastructure and where they will not disrupt the character of established communities.

473-1 cont.

I respectfully request that the Planning Department consider alternative solutions that would meet the housing needs without compromising the integrity of our rural community. I would welcome the opportunity to discuss this matter further and to participate in community meetings concerning the proposed rezoning. Thank you for your time and consideration of the concerns raised in this letter. I look forward to your response and to a resolution that respects the interests of all stakeholders in the Dry Creek community.

Regards

Inline image

Regards
Craig Watts
Owner
Watts Building Co.
916-390-8741
Wattsbuildingco@gmail.com
wattsbuilding.com

LETTER 473: CRAIG WATTS

Response to Comment 473-1

Please see Responses to Comments 115-1 through 115-7.

Letter 474

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Low income housing
Date: Tuesday, March 19, 2024 8:41:37 AM

From: Terry & Linda Webb <webb@surewest.net>
Sent: Friday, March 15, 2024 5:08 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Low income housing

Kally Kedinger-Cecil

474-1 I oppose rezoning of District 1 sites 7, 8, 9 and 10 to 20-30 units. This is too high of a density for these parcels.

Terry Webb

8020 East Drive

Roseville CA 95747

916-768-6682

webb@surewest.net

LETTER 474: TERRY WEBB

Response to Comment 474-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 475

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services; Board Clerk
Subject: FW: Oppose low income/high density housing
Date: Thursday, February 22, 2024 8:29:31 AM

-----Original Message-----
From: Coree W <crwehr1@gmail.com>
Sent: Wednesday, February 21, 2024 4:59 PM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Oppose low income/high density housing

To whomever it may concern,

475-1 We strongly oppose the rezoning and building of low incoming housing on 49 & Dry Creek Road. The housing would back up directly to our house and would cause major disturbances to our family. We have a toddler and dog who play in our backyard almost every day and this would be a huge concern to our safety and privacy. We purchased this house almost four years ago and we were never told that this could happen. As a family who purchased our first home, we would see value lost in our house. We have put sweat equity and love in creating a first home with our family, and this would change that.

Thank you,

Coree Wehr

LETTER 475: COREE WEHR

Response to Comment 475-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Letter 476

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing Element Amendment 2024 and Housing Element Appendix F Adoption
Date: Thursday, March 7, 2024 4:24:01 PM

From: Susan Weinstein <sweinpt@gmail.com>
Sent: Thursday, March 7, 2024 3:09 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Frank Udvarhely <fudvarhely@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; cdraeecs@placer.ca.gov
Subject: Re: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

March 7, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

476-1 My name is Susan Weinstein. I have been a homeowner and resident of Granite Baysince 1998 at 6841 Fallsbrook Court. My family and I have enjoyed more than 25 years in this community and all of our kids were born and raised here.

476-2 My husband and I are very concerned about the Regional Housing Needs Allocation proposed
District 4 rezone "Site 26" (as labelled in "Appendix F: Implementation of Program HE-1
Regional Housing Needs Allocation Rezone Program? dated March 2024). Site 26 is roughly 18 acres of unique rich wildlife habitat, seasonal wetland, perennial stream, oak
woodlands, and highly likely home to Federally Endangered steelhead and California Species of Concern chinook salmon as it is physically and biologically interconnected with Folsom Lake watershed and habitat. In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I
would like to respectfully request the Board of Supervisors reject the Housing Element
Amendment and accompanying Appendix F, and furthermore remove Site 26 from the
proposed rezone program.

476-3 As currently drafted, the Housing Element Amendment and accompanying Appendix

476-3 cont.

F
are ripe for litigation and must be rejected and/or redrafted to remove Site 26 because the Board is responsible for avoiding and/or minimizing environmental damage to Site 26 where feasible. It is feasible and reasonable to remove Site 26 from the rezone program and require it undergo individualized environmental assessment under its existing zoning before development.

476-4

The Placer County Board of Supervisors is the responsible agency that must ensure CEQA's requirements are met while updating the Housing Element. The Board cannot
rely on the certification from the California Department of Housing and Community Development (HCO) as an approval of its environmental review requirements. In public
hearing dated February 22, 2024, county staff recommended the Planning Commission
accept the proposed Housing Needs Rezone Program Draft Environmental Impact Report before them because staff was relying on the letter from the HCD "certifying" the
county's Housing Element submission. However, this is a misplacement of responsibility. The HCD does not certify that the Board will be insulated from

environmental review litigation. It certifies that the Board's submitted plan is in accordance with housing element guidance. The HCD's "Housing Element Update Guidance Attachment 1 Implementation Review" provides a completeness checklist including "Site Inventory and Analysis" which simply requires counties to produce a quote, "general description of environmental constraints to the development of housing."
This standard of environmental review falls dramatically below the CEQA standards for
assessing significant environmental impacts based upon substantial evidence in light of
the record as a whole. The Board is responsible for meeting CEQA?s requirements, not
HCD's completeness checklist requirements. Because the Board cannot rely on HCD's
certification to meet its environmental review requirements, it must remove Site 26 from
the Housing Element Amendment. Simply put, Site 26 is not appropriate for inclusion in
the rezone program because its unique environmental character warrants individualized
conservative environmental impact assessment and does not fit the rezone program's generalized environmental circumstances of typical infill projects for which a "completeness checklist" may suffice.

476-5

Site 26 is considered a "Large Site Development" under the Housing Element. This category must be removed from the Housing Element Amendment entirely because it is

476-5 cont

outside the size parameters of the state's Regional Housing Needs Allocation site requirements and its inclusion will surely lead to litigation for the County on the grounds
of CEQA and other environmental law grounds.

According to HCD's webpage on Housing Element Building Blocks Site Analysis and Zoning, available at https://www.hcd.ca.gov/planning-and-community development/housing-elements/building-blocks/analysis-of-sites-and-zoning, "a parcel smaller than one half acre or over 10 acres is considered inadequate to accommodate
housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these
sites is realistic or feasible." Site 26 is roughly 18 acres and should therefore be excluded from the Housing Element Amendment.

Shockingly, the Housing Element attempts to make Site 26 appear feasible and/or realistic by including incentives for Large Site Developments on page 161b of the Housing Element Amendment. It states, "an expedited review process will be available
for the subdivision of larger sites into buildable lots where the development application
can be found consistent with the General Plan, applicable Specific Plan, and master environmental impact report (EIR)." This is in direct contradiction to the conversations staff and the Planning Commission had at the public hearing on February 22, 2024, whereby the public was assured that this high level Draft Environmental Impact Report
(DEIR or EIR) would be followed up by site specific EIRs when particularized development proposals are submitted in the future. The Board cannot include the

476-6

Large
Site Development section in the Amendment because it is a blatant violation of its duty
to public transparency and the adequate protection of the environment on a site-specific
basis.
In addition, Site 26 must be removed from the rezone program to have an individual EIR
rather than fall under a tiered program-level EIR exemption because (1) the Amendment's proposed "monitoring program" does not have environmental impacts as
stated goals, nor does the umbrella Rezone HE-1 Program, so CEQA exemption under
Guidelines § 21080.5 cannot apply, and (2) the Site does not qualify under the CEQA exemption § 21159.21(d) either. Section 21159.21(d) states:

"The site of the project does not contain wetlands, does not have any value as a wildlife habitat, and the project does not harm any species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.) or by the

476-6 cont

Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050), of Division 3 of the Fish and Game Code), and the project does not cause the destruction or removal of any species protected by a local ordinance in effect at the time the application for the project was deemed complete..."

476-7

The expedited review process incentive in the Housing Element Amendment (cited above), will violate this § 21159.21(d) because Site 26 has numerous characteristics listed above. By Placer County's own admission in the Housing Needs Rezone Program
(PLN22-00476) DEIR, Appendix G, pg. 43, Site 26 supports a perennial creek, seasonal
wetland, and Federally Endangered steelhead and California Species of Concern chinook salmon. There are numerous community members who will testify and have submitted public comment regarding the existence of vernal pools and a vast diversity of wildlife that is too abundant to list in this letter. Site 26 is directly adjacent and biologically interconnected with Folsom Lake Basin, which knowingly supports California
Fully Protected Species, Golden Eagle. In the cursory DEIR Appendix G, pg. 40, the analysis of the likelihood of the Golden Eagle presence on proposed sites was foolishly
dismissed for Site 26 because it declared the sites were "highly fragmented" and not part of the "large expansive areas" the species requires. This may very well be true for
other proposed rezone sites of infill character, but this is a prime example of just how significant the character of Site 26 is a departure from the rest of the rezone program. Site 26 certainly has mature trees supportive of breeding sites and is biologically and physically interconnected with the vast habitat area of Folsom Lake. Federal Take permits for the salmonoids may even be required on this property and Golden Eagles may be nesting, yet the incentives in the Housing Element Amendment mean that Site
26 is proposed to undergo no further environmental review than the skin-deep DEIR currently on record. When viewing the record as a whole, there is substantial evidence
that Site 26 is highly unique and significant environmental impacts would occur if it were
included in the Housing Element Amendment. As such, it must be removed from the Amendment and the rezone program.

476-8

Appendix F makes another feeble attempt to justify Site 26 as realistic or feasible by

declaring the realistic acreage is only roughly 12 acres instead of 18, but the County's analysis will not survive the scrutiny of litigation. With the above stated environmental considerations and ripeness for litigation regarding the presence of protected species, the likelihood of meeting the requisite developable acreage is highly debatable. The current zoning is declared a Design Scenic Corridor, and the Site is part of the Placer County Conservation Plan, which again supports substantial evidence that the Site is

476-8 cont.

unique environmentally. There is no direct evidence of a site walk conducted by qualified personnel to testify to the County's findings in Appendix F. Due to the unique character of Site 26, the County's example parcels outside the District are of completely
different environmental character do not substantiate the claim of 12 developable acres
either. Moreover, as explained above, the County cannot rely on the HCD's guidance to
provide example parcels as sufficient to meet its environmental regulatory requirements-the HCD guideline is intended to help the agency meet the HCD's allocation requirements-not to certify the rezone program's ability to survive environmentally based litigation.

476-9

Finally, I'd like to respectfully request the Board take the conservative approach to development in our county, minimize environmental damage wherever feasible, and therefore be compelled to remove Site 26 from the Housing Element Amendment and Rezone Program entirely.

Thank you for your time and consideration.

Susan Weinstein
Granite Bay Westlake Estates resident

LETTER 476: SUSAN WEINSTEIN

Response to Comment 476-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 476-2
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, it should be noted that impacts to biological resources are evaluated in Chapter 5, Biological Resources, of the Draft EIR. More detail regarding the commenter's biological resources concerns is also provided in Responses to Comments 52-2 and 422-9.

Response to Comment 476-3
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Response to Comment 476-4
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Response to Comment 476-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 30-3.

Response to Comment 476-6
Please see Response to Comment 30-3.

Response to Comment 476-7
Please see Response to Comment 52-2. In addition, it should be noted that impacts to biological resources are evaluated in Chapter 5, Biological Resources, of the Draft EIR. More detailed regarding the commenter's biological resources concerns is also provided in Responses to Comments 52-2, 422-8, and 422-9.

Response to Comment 476-8
Please see Response to Comment 11-7. It is also noted that simply because Site 26 is within the boundaries of the Placer County Conservation Program (PCCP) does not suggest that it is environmentally unique. The majority of western Placer County is within the PCCP boundaries.

Response to Comment 476-9
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 477

From: Kally Kedinger-Cecil
To: Dani Weinstein; Suzanne Jones; Frank Udvarhely; Planning Commission; Placer County Environmental Coordination Services
Subject: RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption
Date: Thursday, March 7, 2024 4:23:52 PM
Attachments: image001.png

Hello,

Thank you for your comments. They will be incorporated into the project record. Additional information on the program is available here: Housing needs rezone program | Placer County, CA

Regards,

Kally Kedinger-Cecil
Senior Planner
Placer County Planning Services Division
kkedinge@placer.ca.gov
530-745-3034

From: Dani Weinstein <dwein7@gmail.com>
Sent: Thursday, March 7, 2024 3:06 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Frank Udvarhely <fudvarhely@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; cdraeecs@placer.ca.gov
Subject: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

March 7, 2024

Placer County Board of Supervisors
Attn.: Senior Planner Kally Kedinger-Cecil
175 Fulweiler Avenue
Auburn, CA 95603

Dear Placer County Board of Supervisors:

RE: Housing Element Amendment 2024 and Housing Element Appendix F Adoption

477-1

My name is Dani Weinstein. I have been a homeowner and resident of Granite Bay since 1998 at 6841 Fallsbrook Court. My family and I have enjoyed more than 25 years in this community and all of our kids were born and raised here.

477-1
Cont.

My wife and I are very concerned about the Regional Housing Needs Allocation proposed
District 4 rezone "Site 26" (as labelled in "Appendix F: Implementation of Program HE-1
Regional Housing Needs Allocation Rezone Program? dated March 2024). Site 26 is roughly 18 acres of unique rich wildlife habitat, seasonal wetland, perennial stream, oak
woodlands, and highly likely home to Federally Endangered steelhead and California Species of Concern chinook salmon as it is physically and biologically interconnected with Folsom Lake watershed and habitat. In regard to public comment period for the Housing Element Amendment 2024 and accompanying Housing Element Appendix F, I
would like to respectfully request the Board of Supervisors reject the Housing Element
Amendment and accompanying Appendix F, and furthermore remove Site 26 from the
proposed rezone program.

As currently drafted, the Housing Element Amendment and accompanying Appendix F
are ripe for litigation and must be rejected and/or redrafted to remove Site 26 because the Board is responsible for avoiding and/or minimizing environmental damage to Site 26 where feasible. It is feasible and reasonable to remove Site 26 from the rezone program and require it undergo individualized environmental assessment under its existing zoning before development.

The Placer County Board of Supervisors is the responsible agency that must ensure CEQA's requirements are met while updating the Housing Element. The Board cannot
rely on the certification from the California Department of Housing and Community Development (HCO) as an approval of its environmental review requirements. In public
hearing dated February 22, 2024, county staff recommended the Planning Commission
accept the proposed Housing Needs Rezone Program Draft Environmental Impact Report before them because staff was relying on the letter from the HCD "certifying" the
county's Housing Element submission. However, this is a misplacement of responsibility. The HCD does not certify that the Board will be insulated from

environmental review litigation. It certifies that the Board's submitted plan is in accordance with housing element guidance. The HCD's "Housing Element Update Guidance Attachment 1 Implementation Review" provides a completeness checklist including "Site Inventory and Analysis" which simply requires counties to produce a quote, "general description of environmental constraints to the development of housing."
This standard of environmental review falls dramatically below the CEQA standards

for
assessing significant environmental impacts based upon substantial evidence in light of
the record as a whole. The Board is responsible for meeting CEQA?s requirements, not
HCD's completeness checklist requirements. Because the Board cannot rely on HCD's
certification to meet its environmental review requirements, it must remove Site 26 from
the Housing Element Amendment. Simply put, Site 26 is not appropriate for inclusion in
the rezone program because its unique environmental character warrants individualized
conservative environmental impact assessment and does not fit the rezone program's
generalized environmental circumstances of typical infill projects for which a
"completeness checklist" may suffice.

Site 26 is considered a "Large Site Development" under the Housing Element. This
category must be removed from the Housing Element Amendment entirely because it is
outside the size parameters of the state's Regional Housing Needs Allocation site
requirements and its inclusion will surely lead to litigation for the County on the grounds
of CEQA and other environmental law grounds.

477-1
cont.

According to HCD's webpage on Housing Element Building Blocks Site Analysis and
Zoning, available at https://www.hcd.ca.gov/planning-and-community
development/housing-elements/building-blocks/analysis-of-sites-and-zoning, "a parcel
smaller than one half acre or over 10 acres is considered inadequate to accommodate
housing affordable to lower income households, unless the housing element
demonstrates development of housing affordable to lower income households on these
sites is realistic or feasible." Site 26 is roughly 18 acres and should therefore be
excluded from the Housing Element Amendment.

Shockingly, the Housing Element attempts to make Site 26 appear feasible and/or
realistic by including incentives for Large Site Developments on page 161b of the
Housing Element Amendment. It states, "an expedited review process will be available
for the subdivision of larger sites into buildable lots where the development application
can be found consistent with the General Plan, applicable Specific Plan, and master
environmental impact report (EIR)." This is in direct contradiction to the conversations
staff and the Planning Commission had at the public hearing on February 22, 2024,
whereby the public was assured that this high level Draft Environmental Impact Report
(DEIR or EIR) would be followed up by site specific EIRs when particularized

development proposals are submitted in the future. The Board cannot include the Large
Site Development section in the Amendment because it is a blatant violation of its duty
to public transparency and the adequate protection of the environment on a site-specific
basis.
In addition, Site 26 must be removed from the rezone program to have an individual EIR
rather than fall under a tiered program-level EIR exemption because (1) the Amendment's proposed "monitoring program" does not have environmental impacts as
stated goals, nor does the umbrella Rezone HE-1 Program, so CEQA exemption under
Guidelines § 21080.5 cannot apply, and (2) the Site does not qualify under the CEQA exemption § 21159.21(d) either. Section 21159.21(d) states:

"The site of the project does not contain wetlands, does not have any value as a wildlife habitat, and the project does not harm any species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.) or by the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050), of Division 3 of the Fish and Game Code), and the project does not cause the destruction or removal of any species protected by a local ordinance in effect at the time the application for the project was deemed complete..."

477-1
cont

The expedited review process incentive in the Housing Element Amendment (cited above), will violate this § 21159.21(d) because Site 26 has numerous characteristics listed above. By Placer County's own admission in the Housing Needs Rezone Program
(PLN22-00476) DEIR, Appendix G, pg. 43, Site 26 supports a perennial creek, seasonal
wetland, and Federally Endangered steelhead and California Species of Concern chinook salmon. There are numerous community members who will testify and have submitted public comment regarding the existence of vernal pools and a vast diversity of wildlife that is too abundant to list in this letter. Site 26 is directly adjacent and biologically interconnected with Folsom Lake Basin, which knowingly supports California
Fully Protected Species, Golden Eagle. In the cursory DEIR Appendix G, pg. 40, the analysis of the likelihood of the Golden Eagle presence on proposed sites was foolishly
dismissed for Site 26 because it declared the sites were "highly fragmented" and not part of the "large expansive areas" the species requires. This may very well be true for
other proposed rezone sites of infill character, but this is a prime example of just how significant the character of Site 26 is a departure from the rest of the rezone program. Site 26 certainly has mature trees supportive of breeding sites and is biologically and

physically interconnected with the vast habitat area of Folsom Lake. Federal Take permits for the salmonoids may even be required on this property and Golden Eagles may be nesting, yet the incentives in the Housing Element Amendment mean that Site
26 is proposed to undergo no further environmental review than the skin-deep DEIR currently on record. When viewing the record as a whole, there is substantial evidence
that Site 26 is highly unique and significant environmental impacts would occur if it were
included in the Housing Element Amendment. As such, it must be removed from the Amendment and the rezone program.

Appendix F makes another feeble attempt to justify Site 26 as realistic or feasible by

declaring the realistic acreage is only roughly 12 acres instead of 18, but the County's analysis will not survive the scrutiny of litigation. With the above stated environmental considerations and ripeness for litigation regarding the presence of protected species, the likelihood of meeting the requisite developable acreage is highly debatable. The current zoning is declared a Design Scenic Corridor, and the Site is part of the Placer County Conservation Plan, which again supports substantial evidence that the Site is unique environmentally. There is no direct evidence of a site walk conducted by qualified personnel to testify to the County's findings in Appendix F. Due to the unique character of Site 26, the County's example parcels outside the District are of completely
different environmental character do not substantiate the claim of 12 developable acres
either. Moreover, as explained above, the County cannot rely on the HCD's guidance to
provide example parcels as sufficient to meet its environmental regulatory requirements-the HCD guideline is intended to help the agency meet the HCD's allocation requirements-not to certify the rezone program's ability to survive environmentally based litigation.

477-1 cont.

Finally, I'd like to respectfully request the Board take the conservative approach to development in our county, minimize environmental damage wherever feasible, and therefore be compelled to remove Site 26 from the Housing Element Amendment and Rezone Program entirely.

Thank you for your time and consideration.

Dani Weinstein
Granite Bay Westlake Estates resident

LETTER 477: DANI WEINSTEIN

Response to Comment 477-1

Please see Responses to Comments 476-1 through 476-9.

Letter 478

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Remove site 26
Date: Thursday, March 7, 2024 5:09:19 PM

From: Jaime Welcher <jaimewelcher@gmail.com>
Sent: Thursday, March 7, 2024 5:05 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Frank Udvarhely <fudvarhely@placer.ca.gov>; Planning Commission <planningcommission@placer.ca.gov>; cdraeecs@placer.ca.gov
Subject: Remove site 26

478-1

I am a Granite Bay resident currently living in Folsom Lake Estates off of Auburn/Folsom across from Beals Point. I have been here for 14 years. I am requesting you remove site 26 from the Housing Element Amendment and Rezone Program.
Putting the high-density housing in that area is unbelievable. Anyone who lives here already knows the impact that many homes will have on our community is detrimental to those of us who currently live here.
1. Traffic is already congested.
2. public transportation does not support low and low-income residents.
3. Safety of students at Cavitt Jr High will be at-risk - not only the increased traffic dangers, but the kids who walk and ride bikes to school with up to 1000 + cars added to an already taxed area.
4. Isn't that area a flood zone - and the environmental impact.
5. The area doesn't have the sewer system and water available that can support that type of growth?

Businesses in the adjacent corner are opposed to this potential development. Existing businesses and the community are both opposed to this development.

Do any of you voting actually live in this area? Do you have any skin in the game whether this goes through or not? I will tell you, if this development existed when we were considering moving here 14 years ago, we would not have done it.

Jaime Welcher
10055 Willey Court
GB

LETTER 478: JAIME WELCHER

Response to Comment 478-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is not currently evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations do not currently constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies; the relevant information will be provided in the project staff reports and made available to the public and decision-makers.

Additionally, the County has secured grant funding to install a new enhanced crosswalk for pedestrians crossing Fuller Drive near Cavitt Junior High School. The grant funding is unrelated to the proposed project and will be installed whether or not site 26 is rezoned as part of the proposed project. That new crosswalk could alleviate the concerns raised by the commenter.

Regarding flooding concerns, as discussed on page 52 of the Initial Study (Appendix A to the Draft EIR), Rezone Site #26 is partially within a FEMA Flood Hazard Zone. Future development would be required to comply with several General Plan policies related to flood hazards, such as Policy 8.B.1.3, which requires future development applications to evaluate the potential of flood hazards; Policy 8.B.1.4, which restricts new construction from being permitted within 100 feet of the centerline of permanent streams and within 50 feet of intermittent streams, or within the 100-year floodplain; and Policy 8.B.1.5, which requires that the County maintain natural conditions within the 100-year floodplain, while allowing limited crossings and improvements for public roads, trails, and utilities.

In addition, all future improvements would be subject to Article 15.52, Flood Damage Prevention Regulations, of the Placer County Code, which is intended to minimize public and private losses due to flood conditions, including where public facilities and utilities are located within areas of special flood hazard. The Flood Damage Prevention Regulations provide methods for reducing flood losses and set forth standards for construction in all areas of special flood hazards. As noted within the Flood Damage Prevention Ordinance, new development (including all site grading) is required to be outside of the 100-year floodplain, unless another option is not available.

Considering the above, the proposed project is not anticipated to result in the impediment or redirection of flood flows such that on- or off-site structures would be exposed to flood risk. However, if avoidance of the 100-year floodplain is not feasible, a Conditional Letter of Map Revision (CLOMR) would be required prior to Improvement Plan approval for the sites located within Flood Hazard Zones in order to ensure the project's compliance with existing regulations. Therefore, the Initial Study includes mitigation measures (X-7 through X-10) to ensure that any residential development within the floodplain would not adversely affect upstream or downstream properties.

Regarding sewer and water concerns, as discussed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project, San Juan Water District, which receives wholesale water from the Placer County Water Agency (PCWA) would provide water to Rezone Site #26. As discussed therein, according to the PCWA's 2020 UWMP, sufficient water supplies

are available to serve reasonably foreseeable future development at the rezone sites, including Rezone Site #26. With respect to sewer services, buildout of the rezone sites may result in the need for upgrades to existing sewer infrastructure depending on the size and location of future development. However, pursuant to General Plan Policy 4.D.3, the project applicant of each future residential development project on the rezone sites would be required to provide written certification from the sewer service provider that either existing services are available or needed improvements would be made prior to occupancy of the development. Compliance with General Plan Policy 4.D.3 would ensure that adequate capacity would be available to serve the projected demand generated by the future residential development of each rezone site, in addition to the County's existing commitments. Therefore, the impacts related to increased demand on utilities infrastructure were concluded to be less-than-significant. As such, impacts related to such were adequately addressed in the Draft EIR.

Letter 479

From: Wanda
To: Placer County Environmental Coordination Services
Subject: 8989Auburn Folsom Blvd Parcel 26
Date: Friday, March 8, 2024 7:21:35 PM

479-1

Please take this property of the reasoning list. Wildlife runs here, trails, do not do this. We do not want a Bay Area in our area. You will destroy wildlife, trees, outdoor recreation.
Wanda Ferranti West
Sent from my iPhone

LETTER 479: WANDA WEST

Response to Comment 479-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 480

Herb Whitaker
165 Russell Road
Auburn, CA 95603
March 18, 2024

Placer County Community Development Resource Agency

Attention: Kally Kendinger-Cecil

Re: Housing Element Site Rezone Project Environmental Impact Report

Thank you for this opportunity to comment on the draft Environmental Impact Report for the Housing Element Site Rezone Project. I am writing in support of the project and urge the Planning Commission and the Board of Supervisors to certify the EIR and adopt the approvals listed in the staff's Executive Summary. I urge the rejection of the project alternatives.

I have been a resident of the unincorporated Placer County for the past 30 years. I reside approximately one-half mile from site numbers 71 & 72, included in the project. I am the former Managing Attorney of the Auburn Office of Legal Services of Northern California. In that capacity I worked since 1989 to advocate for affordable housing in the county. Over the years I worked with and in support of Placer County's efforts to develop affordable housing, including litigating in an *amicus curiae* status on the Silver Bend development case, participating on the Placer County Affordable Housing Task Force, and supporting numerous specific projects.

480-1 As a result of my residence and professional experience, I witnessed first hand the effects of the housing crisis facing our citizens and the extreme difficulty in developing affordable housing to address it. Rezoning alone will not be enough to address the problem, but it is an essential first step. In addition, this is not merely a discretionary action. Adoption of the rezoning project is legally required to be consistent with the Placer County Housing Element Program H-1, and to comply with state housing element law.

The County staff is to be commended for the herculean task of identifying the potential sites for rezoning and the extremely thorough job of environmental review. I know that this has been needed for many years. While I cannot speak to situation for all of the sites, I am very familiar with sites in my neighborhood, numbers 71 and 72 on Lincoln Way in Auburn. I know of no significant environmental impacts that would result from the development of these sites pursuant to the rezone project. In fact, I agree with the many experts, including the Sierra Club, who have concluded to high density multi-family housing, especially in areas such as these located near transit and town amenities, is the best way to protect the environment while addressing critical housing needs.

For these reasons I say: Yes In My Back Yard! I urge the adoption of the rezone project.

Thank you for your consideration.

Herb Whitaker

LETTER 480: HERB WHITAKER

Response to Comment 480-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 481

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Housing or zoning project?
Date: Tuesday, March 19, 2024 10:36:19 AM
Attachments: image001.png
Placer Housing - 3.16.24.docx

From: William Whitaker <whwhitaker@hotmail.com>
Sent: Monday, March 18, 2024 10:01 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Re: Housing or zoning project?

Hi Kally,

481-1

Attached is my comment letter supporting the EIR for the Rezone Project. I hope that it's helpful. Please confirm receipt.

Also, can you put me on the contact list for this project as it goes forth?

Thanks.

Herb

From: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Sent: Wednesday, March 13, 2024 4:11 PM
To: William Whitaker <whwhitaker@hotmail.com>
Subject: RE: Housing or zoning project?

Hi Herb,

Placer County is proposing to rezone 18 sites in unincorporated areas to a new zoning designation called RM30-Dc, which means "Residential Multifamily 30, Combining Design Corridor." This new zoning designation would enable a minimum residential density of 20 dwelling units per acre and a maximum of 30 units per acre. Two properties located at 85 Lincoln Way are proposed to be rezoned to this new zoning designation. An active development proposal has not been formally submitted to the County for a project on these sites, however it's my understanding that the property owner is interested in pursing multifamily development.

The rezone program is being undertaken to ensure compliance with the adopted Housing Element and state housing law. The Housing Element identified a shortfall of lower-income units in Placer County, and the County must ensure there is sufficient capacity of land zoned for a minimum of 1,219 units. While the RM30 zoning designation does not in and of itself require that residential developments on these sites be deed-restricted for lower-income residents, the intent of the program is to ensure there is sufficient residential capacity for all income levels.

An EIR has been prepared for the rezone program, and the public comment period closes on March 18. Additional opportunities for public input include a hearing before the Planning Commission tentatively scheduled for April 25 to receive a recommendation from the Planning Commission to the Board of Supervisors, and a hearing before the Board of Supervisors on May 7 for a final action on the rezone program.

The Draft EIR and technical reports are available here: Housing Element Sites Rezone | Placer County, CA

Comments on the draft EIR can be sent to myself and/or to cdraecs@placer.ca.gov, or in writing to:

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr., Ste 190
Auburn, CA 95603

Additional information on the rezone program including program updates, previous meeting videos, and other relevant information is available here: Housing needs rezone program | Placer County, CA

Please let me know if you have any additional questions.

Regards,

Kally Kedinger-Cecil
Senior Planner
Placer County Planning Services Division
kkedinge@placer.ca.gov
530-745-3034

From: William Whitaker <whwhitaker@hotmail.com>
Sent: Wednesday, March 13, 2024 2:06 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Housing or zoning project?

Hi Kally,

481-2

A confusing notice was posted in my neighborhood about a housing project on Lincoln Way in Auburn, and an EIR and a rezone (see attached).

481-2 cont.

I am generally a pro affordable housing advocate, and I would like to comment on this project, but I cannot find any information on it at the county site. Can you please identify the name of the project (if there is one) and how I can find the EIR or other information about it, and the comment deadlines.

Thank you.

Herb Whitaker

LETTER 481: HERB WHITAKER

Response to Comment 481-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 481-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 482

From: Frances White
To: Kally Kedinger-Cecil; Placer County Environmental Coordination Services
Subject: Site 74 Rezone
Date: Monday, February 12, 2024 2:29:31 PM

Just because there's land to build low- income housing doesn't mean it's optimal. If our leaders/politicians build and place low income/homeless population in Auburn California, it's an intentional disservice for the following reasons.

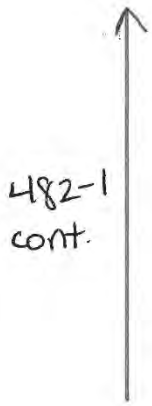
482-1

1) Auburn has no public transportation: Low income/homeless population absolutely need to be near public transportation to connect with job opportunities, med appts, and so forth. After housing the biggest expense is a car and associated expenses. Zone 74 is not walkable to



required amenities. *Will our leaders/politicians be adding public transportation into other cities?
2) No job opportunities in Auburn, 98% of those that live in Auburn work outside of Auburn. *Will our leaders/politicians be creating more local job opportunities?
3) Auburns expensive. If you want food and clothing affordability you need to shop in Sacramento. *Do our leaders/politicians plan for building affordable shopping?
4) Limited Schools that are already overwhelmed. **Does the plan account to build additional schools?
5) Auburn is already overcrowded with slim

482-1 cont.



resources.
6) Increase population requires increase in Services, such as police, medical and so on. *Do our leaders/politicians plan for additional support?

LETTER 482: FRANCES WHITE

Response to Comment 482-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 6 – Impacts to Local Schools.

Letter 483

From: joe white
To: Kally Kedinger-Cecil; Placer County Environmental Coordination Services
Subject: Site 74, rezone
Date: Monday, February 12, 2024 10:36:22 AM

Hello rezoning board,

I oppose the rezoning of site 74, for the purpose of bring in low to no income people to our community.

I oppose because of higher life threatening crime.
These people are going to be moved to Site 74, and haven't the resources to get to work, store. These low income, homeless bring no improvements to our community, have no jobs, little or no job skills. The community of Auburn is already over populated, and the county doesn't have the resources for more!
Our food, gas costs are already higher than most CA areas, this will be another excuse for Utilities to go even higher!! They obviously have no jobs in Auburn, or anywhere else if low income or homeless! My home cost over a half million dollars, what will happen to my home value if these homeless, low income people are allowed to move here??? Site 74 should be taken off the list of rezoning sites for the homeless, low income people!! You will cause me to uproot my family and sell my home, so some rich people can sell their land for great profit and leave the burden of higher crime, homeless camps setup in my backyard!! I say NO, and everyone in our small community say NO!!

483-1

Respectively,
Joseph White
NO ON SITE 74 REZONE

LETTER 483: JOSEPH WHITE

Response to Comment 483-1

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 484

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Dry Creek Rezone
Date: Tuesday, March 19, 2024 10:59:07 AM
Attachments: Outlook-foxduz5d.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:14 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Dry Creek Rezone

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Alice Meltzer Wiens <ameltz022@gmail.com>
Sent: Monday, March 18, 2024 4:23 PM
To: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Fwd: Dry Creek Rezone

Hello,

484-1 I live in the Brady Vineyards community, and am respectfully writing in opposition to the proposed rezoning of sites 3 through 10 in Dry Creek. I agree with the need for more lower-income housing in Placer County, but DO NOT support rezoning these sites in Dry Creek for high-density apartments.

My primary concerns are as follows:

484-2

1. The majority of the roads these proposed sites are located on don't have sidewalks and are mostly only 1 lane in each direction. There aren't any traffic lights protecting those intersections, and there is a huge lack of street lights to illuminate the area at night. This is both a safety issue and a traffic flow issue. Where will visitors and additional resident vehicles from these apartment complexes park? How will they walk to school or the local bus stop? Will cars be able to see the influx of pedestrians and jaywalkers at night?

484-3

2. Local firefighters have said that they are already understaffed, and regularly request additional Paramedics from surrounding areas to assist with emergency calls in Dry Creek. Adding hundreds of families to the area would put us all directly at risk of longer EMS & fire response times, which would be costly, dangerous, and potentially fatal. The same can be said for our local police department and hospitals.

484-4

3. Many of us moved to this area because it has a rural and intimate feel to it. A huge draw of the area is the nature and wildlife that can be found here (big trees, deer, birds, farm animals, etc). When we all purchased our homes, it was with the understanding that the surrounding areas were primarily zoned for farm land and/or low-density single-family homes. Large apartment buildings would negatively affect the habitats of local wildlife, reduce privacy, over-populate the area, and threaten Dry Creek's natural beauty.

484-5

4. Surrounding the existing single-family homes and neighborhoods with a disproportionately high concentration of low-income housing (rather than spacing it out throughout the county) will significantly reduce home values in Dry Creek. Is the county prepared to offset those losses by reimbursing current Dry Creek residents? Would resulting lawsuits ultimately end up costing the taxpayers even more money?

484-6

5. There are <u>many</u> other parts of Placer county with available space that would be MUCH better suited for high-density apartment buildings! More heavily populated areas of Roseville & Rocklin already have the infrastructure and accessibility needed for these types of developments.

484-7

Please take these points into consideration, along with the many others that I know are being sent to you from other members of the community. It's quickly becoming common knowledge that the county has not followed proper protocols in trying to push these rezoning projects through. The lack of transparency and due-diligence is deeply concerning, and could likely become grounds for legal recourse. If nothing else, I highly encourage you to keep taxpayer money and your re-election aspirations in mind while making this decision. However, as representatives of the people, I hope you will also consider how these changes would negatively affect our safety and way of life here in Dry Creek.

Thank you,

Alice Meltzer Wiens

LETTER 484: ALICE WIENS

Response to Comment 484-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 484-2
Please see Master Response 4 – Traffic Safety.

Response to Comment 484-3
As discussed under Impact 10-1 in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, Placer County Fire Department personnel confirmed in correspondence with the County that the existing fire stations that would serve and are located proximate to the rezone sites would be adequate to serve the proposed rezone sites. Rezone sites in Dry Creek would be served by Dry Creek Station 100, located at 8350 Cook Riolo Road. Furthermore, a new fire station is planned to be developed as part of the Placer Vineyards Specific Plan.

Response to Comment 484-4
Please see Master Response 1 – Non-EIR/Administrative Issues. Future residential developers would also be required to pay land conversion fees to PCA which goes towards preservation of habitat within dedicated preserve areas pursuant to the PCCP. This is the regional strategy that resource agencies have agreed to in order to help balance the need for development and habitat preservation.

Response to Comment 484-5
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 484-6
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 484-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 485

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT
Date: Monday, March 11, 2024 10:30:05 AM

From: Andy W <awiens037@gmail.com>
Sent: Friday, March 8, 2024 5:59 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; jess.negrete@hcd.ca.gov
Subject: COMMENTS FOR HCD ON PLACER COUNTY HOUSING ELEMENT AMENDMENT

Dear Placer County Staff and HCD Staff,

I am writing to express my concerns about the Placer County Housing Element Amendment and the proposed rezoning for properties across Placer County.

1) I think it is problematic that several major new developments in District 1 have not been required to meet the 10% obligation for low income housing allotments that the county already had in place (this alone would have dealt with the shortfall). I believe this opens avenues to potential law suits such as the Martinez vs. City of Clovis which partly dealt with the city of Clovis not working to actually build low income (affordable) housing as they were supposed to. Lawsuits are extremely expensive and take time and resources away from our community. Avoiding litigation is paramount, and this decision appears that it may open up the County to unnecessary exposure and expense.

485-1

2) The places that have been chosen in District 1 are long-established communities that are not viable places because of infrastructure issues and environmental constraints on those properties (example: water table and flood issues) The existing houses in these communities house older citizens who have lived here for decades and may, in fact, be on limited incomes which would make problems that are brought by the addition of apartments nearby on their own wells and septic systems cost prohibitive for them to address since this was never an intended land use in their 1-2 acre residential community.

3) The criteria that the county used to seek out sites for rezoning were relatively random. The categorization of "underutilized" land is a subjective measure. For example, saying that a plot of land which now hosts a strawberry and vegetable patch which feeds the local community is hardly "underutilized." Furthermore, the idea that proposed properties must be under 10 acres was based on a settlement that Martinez got in the Clovis lawsuit that had nothing to do with a state mandate or even a court ordered situation. It was just the agreement attorneys were able to make with the city of Clovis and the settlement in Clovis dealt with a city--not a county-where space would be limited. These new developments are on 100's of acres of land that have the ability to install infrastructure that would appropriately support high density low income housing.

4) This plan did not adequately involve the public nor local governmental groups such as the school boards of the districts to which the students from these developments would be going. Posting notification signs on a Friday night before a Tuesday meeting is hardly adequate time for the public to be able to be involved and bring to light the various problems with each site and also potential alternatives that actually are viable. Additionally, Dry Creek Joint Elementary School District was not consulted or included in the Draft EIR for properties proposed in District 1, one of which is directly across the street from Creekview Ranch School.

485-1 Cont.

For these reasons I believe that the HCD should require Placer County to take more time to find more appropriate properties that will serve the current and future residents of Placer County appropriately.

Best,
Andrew Wiens

LETTER 485: ANDREW WIENS

Response to Comment 485-1

Please see Responses to Comment Letter 62.

Letter 486

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Opposition statement regarding the Placer County's Housing Element Sites Rezone Proposal for District 1.
Date: Tuesday, March 19, 2024 10:58:42 AM
Attachments: Outlook-4ovhi4a1.png

From: Robyn Dahlgren <RDahlgren@placer.ca.gov>
Sent: Monday, March 18, 2024 6:13 PM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Subject: Fw: Opposition statement regarding the Placer County's Housing Element Sites Rezone Proposal for District 1.

Robyn A. Dahlgren

Planning Commissioner

Community Development Resource Agency

3091 County Center Drive, Auburn, CA 95603

(916) 541-2144

From: Jim Wilcox <jvwilcox@sbcglobal.net>
Sent: Sunday, March 17, 2024 9:32 PM
To: Supervisor Gore <SupervisorGore@placer.ca.gov>
Cc: Shanti Landon <SLandon@placer.ca.gov>; Jim Holmes <JHolmes@placer.ca.gov>; Suzanne Jones <SuzanneJones@placer.ca.gov>; Supervisor Gustafson <SupervisorGustafson@placer.ca.gov>; Board Clerk <BoardClerk@placer.ca.gov>; Robyn Dahlgren <RDahlgren@placer.ca.gov>
Subject: Opposition statement regarding the Placer County's Housing Element Sites Rezone Proposal for District 1.

Subject: Opposition Letter to Placer County's Housing Element Sites Rezone Proposal

Date: March 17, 2024

To Placer County Staff, Placer County Governing Body and the State of California:

My letter below is my opposition statement regarding the Placer County's Housing Element Sites Rezone Proposal for District 1.

Per Gov. Code Section 65584(d)(2), the regional housing needs allocation plan shall further all the following objectives: Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the regions greenhouse gas reductions targets provided by the State Air Resource Board pursuant to Section 65080.

By definition infill development refers to the construction of buildings or other facilities on previously unused or underutilized land located within an existing urban-or otherwise developed area. Infill development often works in concert with urban growth boundaries, which designate the limits of growth for urban areas and protect undeveloped land on the periphery of the city.
As taken directly from California Department of Housing and Community Development's (HCD) website titled, Regional Housing Needs Allocation (RHNA), the Housing Element Sites Rezone Proposal of properties 7, 8, 9, and 10 within District 1 are in direct violation of the California's Government Code Section 65584(d)(2) and the definition of infill development. The above referenced properties are not part of an existing urban development and are part of Placer County's agricultural resources. It is the job of Placer County's government to protect this undeveloped land per California Law. Furthermore, per HCD's website, Opportunities for Energy Conservation | California Department of Housing and Community Development, "according to the Urban Land Institute publication Growing Cooler, "conserving or developing infill housing within a more urban core has been shown to reduce primary energy consumption an average of 20 percent per household over newer sprawl developments."

It is apparent that the staff of Placer County who composed the Housing Element Sites Rezone Proposal, did not do the analysis needed in order to be compliant with the State's standards for RHNA. Government Code Section 65584(d) was only referenced twice in the proposal and did not thoroughly explain the statutory objectives set out in this piece of California Law.
Due to the poor planning of Placer County, rezoning is being proposed and forced upon its residents without thorough analysis and research. The purpose of the RHNA program set out by the State of California is to ensure sites are zoned to allow owner-occupied and rental multifamily residential uses "by-right" (only subject to ministerial approval) in which 20 percent or more of the units are affordable to lower income households. In no place within HCD's website does it indicate that governments should rezone land to meet this need. It is intended that properly zoned land be used for RHNA. Per HCD's webpage, Program Overview and Quantified Objectives | California Department of Housing and Community Development, Placer County should have identified adequate sites, with appropriate zoning and development standards and services to accommodate the locality's share of the regional housing needs for each income level. HCD has requested that over zoning be done in order to meet RHNA. Placer county should have created a surplus of land for residential development during land planning of at least 20 percent more than the locality's share of the regional housing need. Placer County has failed to meet these standards by their proposal.

4861

Properties 7, 8, 9, and 10 within District 1 are located in a rural area on the periphery of Placer County. This community known as Dry Creek was developed so that properties were at a minimum of 2-acre plots. Dry Creek land currently houses generational families, livestock, and agriculture. Introducing high-density house will remove this landscape and environment that could potentially cause major issues to the ecosystem.

The Dry Creek community does not have the infrastructure to support Placer County's proposal. The roads which the proposed high-density housing is one lane with no sidewalks and have minimal stop signs and most with no street lights or traffic lights. The water supply and sewage systems are not running in those areas causing undue repercussions for the community. There is no reference of increasing needs for staffing in regards to Roseville Electric, the City of Roseville, and Roseville Police Department that would be needed to develop and support this proposal. Additionally, the school districts of Dry Creek Joint Elementary School District, Roseville City Elementary School District and Roseville Joint Union High School District do not have the ability to support an increase in student population. Newly developed neighborhoods in West Roseville and Dry Creek Community have have students assigned school the Center Unified School District.

While I understand the need for affordable housing in Placer County, the Housing Element Sites Rezone

486-1 cont.

Proposal does not meet the State's standards and is in direct violation of California Law. I request that the governing body of Placer County consider alternative solutions. Thank you for your time and consideration of my substantiated information. I look forward to your response and to a resolution that respects the interests of all stakeholders.

Sincerely,

James & Victoria Wilcox
3050 Bulrush St,
Roseville, CA 95747

Email: jvwilcox@sbcglobal.net
Phone: 510.459.9029

LETTER 486: JAMES AND VICTORIA WILCOX

Response to Comment 486-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 6 – Impacts to Local Schools.

Letter 487

From: YVETTE WILLIAMS
To: Board Clerk; Placer County Environmental Coordination Services
Subject: Sheridan Rezoning Sites
Date: Thursday, March 7, 2024 10:25:14 AM

Hello,

487-1 I am a resident of Sheridan, CA - first as a renter, in 2014. Then I was able to become a first time homeowner, in 2017 and my family and I are still located here in this little community. And we plan on staying here, and passing our property and home onto our child and grandchildren.

487-2 I am writing this letter to voice my concerns of the possible multi-family rezoning - RD-20 or RD-30 housing project. Sheridan itself is not ready, nor does it have the ability, to take on 20-30 more homes without major considerations and updates taken.

The following are a list of a few of my family's concerns:

487-3 *Our sewer infrastructure. It is outdated and cannot accommodate more usage without updates

487-4 *Fire control - as we only have an unmanned volunteer Fire Station

487-5 *Police and Safety we only have the Placer County Sheriff Department for any assistance needed and that alone takes at the minimum 10-15 mins to come to any emergency - if not longer (30 mins in some cases) which in and of itself needs addressing.

487-6 *Without Police presence we have petty crime that already exists, and would exasperate with more homes/people in the area

487-7 *Lack of public sidewalks and lighting

487-8 *Speeding is already an issue in town as it is. With one child getting seriously injured when hit by a vehicle on F Street 3 years ago. Constant speeding on Riosa/ H Street and F Streets.

487-9 *Limited resources such as one small convenience store located in town. No access to banks, stores or gas stations.

487-10 *No transportation or bus stops for locals

These are just a few of my family's concerns. We are well aware that this area will grow, and we are excited to see that growth. We also look forward to welcoming new members to our tight knit community, but without any of the issues above addressed, we are setting this opportunity up for failure.

487-11 I hope you take in consideration all of the above and perhaps reconsider a multi housing project in Sheridan CA at this time - and reconsider once improvements have been made.

Thank you for your time and consideration of this matter.

Respectfully,

Yvette A. Williams
4805 H Street
Sheridan CA 95681
Mailing address: POBox 162
Sheridan CA 95681

--
Thank you,

Yvette A. Williams
530-903-2296

LETTER 487: YVETTE WILLIAMS

Response to Comment 487-1
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 487-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 487-3
As discussed in Section XIX, Utilities and Service Systems, of the Initial Study prepared for the proposed project, buildout of the rezone sites may result in the need for upgrades to existing sewer infrastructure depending on the size and location of future development. However, pursuant to General Plan Policy 4.D.3, the project applicant of each future residential development project on the rezone sites would be required to provide written certification from the sewer service provider that either existing services are available or needed improvements would be made prior to occupancy of the development. Compliance with General Plan Policy 4.D.3 would ensure that adequate capacity would be available to serve the projected demand generated by the future residential development of each rezone site, in addition to the County's existing commitments. Therefore, the impacts related to increased demand on utilities structure were concluded to be less-than-significant. As a result, impacts related to such were adequately addressed in the Draft EIR.

Response to Comment 487-4
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, potential impacts of the proposed project related to wildfire hazards are discussed in Chapter 10, Fire Protection and Wildfire.

Response to Comment 487-5
Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, it should be noted that potential impacts associated with the proposed project related to public services such as police and sheriff protection are discussed in Section XV of the Initial Study prepared for the proposed project.

Response to Comment 487-6
Please see Master Response 1 – Non-EIR/Administrative Issues and Response 2 – Social and Economic Impacts.

Response to Comment 487-7
Please see Master Response 1 – Non-EIR/Administrative Issues. It should be noted that potential traffic safety hazards and project-related impacts to pedestrian facilities are evaluated in Chapter 8, Transportation, of the Draft EIR under Impact Statement 8-2.

Response to Comment 487-8
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 487-9

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 487-10

Please see Master Response 1 – Non-EIR/Administrative Issues. It should be noted that project-related impacts to public transit facilities are evaluated in Chapter 8, Transportation, of the Draft EIR under Impact Statement 8-2.

Response to Comment 487-11

Please see Master Response 1 – Non-EIR/Administrative Issues.

Letter 488

From: LAURE WOLFREY
To: Placer County Environmental Coordination Services
Subject: Cavitt/Auburn Folsom Road Apartments
Date: Sunday, March 10, 2024 7:31:05 AM

488-1

Hello,
I would like to request this project for apartments to be built near Auburn Folsom Road on Cavitt would be halted.
There are animals out there that roam in the free space and we've taken enough from them.
And if this were to move through, I would request the time be allowed for proper EIR to be performed.
Thank you.
Laure Wolfrey

Sent from my iPhone

LETTER 488: LAURE WOLFREY

Response to Comment 488-1

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Letter 489

From: LL Wray
To: Placer County Environmental Coordination Services; Board Clerk
Subject: Housing Rezone Program
Date: Thursday, March 14, 2024 12:43:30 PM

Placer County Community Development Resource Agency - Environmental Coordination Services

489-1 I have reviewed the DEIR report and by an untrained eye can identify dozens of inaccuracies. The Housing Rezone Program has clearly been rushed with only one qualifying factor, a willing property owner. I would hope a professional with the County actually walk these sites, view the creeks, wildlife and surrounding established properties. Homes that residents have poured all their money, sweat and tears into. Rezoning properties, specifically District 1 sites, is reckless and can not support high density population.

Placer County is destroying trust with thousands of residents. The public has been loud, yet the County is pushing inaccurate DEIR Reports to check off the box and still has this on the table for May approval? Why wasn't an extension filed in 2023 and county properties put on fast track??

Sincerely,
Liz Wray
2090 Central Ave
Roseville, CA 95747

LETTER 489: LIZ WRAY

Response to Comment 489-1

Please see Master Response 1 – Non-EIR/Administrative Issues. As detailed in the Biological Resources Assessment (BRA) (included within the Draft EIR as Appendix G), the biological resources analysis was conducted at a programmatic level. Draft EIR Mitigation Measure 5-1(a) requires all parcels to undergo a field survey by a qualified biologist prior to the County approval of any permit authorizing construction on a rezone site. While Appendix G to the Draft EIR provides a summary of the sensitive biological resources that may be present and mitigation measures for impacts to those resources for each parcel, a final list will be developed as part of Mitigation Measure 5-1(a).

Letter 490

From: LL Wray
To: Kally Kedinger-Cecil; Board Clerk; Supervisor Gore; Placer County Environmental Coordination Services
Subject: Re: Appeal - Housing Needs Rezone Program - District 1
Date: Thursday, February 22, 2024 2:01:58 PM
Attachments: image001.png
image.png

490-1

I would like to suggest a change in neighborhood notifications for rezoning in rural areas that support the transparency claim staff keeps mentioning during last weeks workshop and todays meeting.

In rural neighborhoods, the 300' notification may include only one parcel. It would support your claim of transparency if you widen that in such areas. Example below. I am the second parcel from site #5 of the rezoning program, with the home on the left at 2090 Central Ave Roseville. My property and lifestyle would be affected by high density rezoning. My neighbor is the only one that received notification on 2/8/24 via USPS mail.

Can you please update the notification perimeter as I would hope to be notified if site 3/4/5 are 'considered' in the future and based on public comment, others would appreciate this update as well.

Thank you for your time.
Liz Wray
2090 Central Ave
Roseville, CA 95747



On Mon, Feb 12, 2024 at 11:20 AM Kally Kedinger-Cecil <KKedinge@placer.ca.gov> wrote:

> Hello,
>
> Thank you for submitting the petition, it will be incorporated into the project record and provided to the Board of Supervisors. Additional information on the rezone program is also available here: Housing needs rezone program | Placer County, CA
>
> Regarding appeals- actions by the Board can be litigated, but they cannot be appealed.

Regards,

Kally Kedinger-Cecil

Senior Planner

Placer County Planning Services Division

kkedinge@placer.ca.gov

530-745-3034

From: LL Wray <llwray44@gmail.com>
Sent: Monday, February 12, 2024 9:55 AM
To: Board Clerk <BoardClerk@placer.ca.gov>; Kally Kedinger-Cecil <KKedinge@placer.ca.gov>; Supervisor Gore <SupervisorGore@placer.ca.gov>; Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>
Cc: LL Wray <llwray44@gmail.com>
Subject: Appeal - Housing Needs Rezone Program - District 1

490-2

How does one file an appeal for the rezone program, District 1, East Drive/Central Ave sites? I would like to formally file an appeal. Sent 115 petition signatures in previous email labeled "Petition Attached..." and priority overnighting original signatures via Fedex, for 2/13/24 by 8:30am. Fedex Tracking 775150782574

Liz Wray

2090 Central Ave

Roseville, CA 95747

(916) 406-4135

LLWray44@gmail.com

LETTER 490: LIZ WRAY

Response to Comment 490-1

Please see Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 490-2

Please see Master Response 1 - Non-EIR/Administrative Issues.

Letter 491

From: LL Wray
To: Board Clerk; Kally Kedinger-Cecil; Supervisor Gore; Placer County Environmental Coordination Services
Cc: LL Wray
Subject: Petition Attached- Housing Needs Rezone Program - District 1
Date: Monday, February 12, 2024 9:06:43 AM
Attachments: Petition Rezone Sites on East Dr - District 1 115 Signatures.pdf
Fedex Label.pdf

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Dr, Ste 190
Auburn, CA 95603

February 13, 2024

Subject: Petition for Rezoning Program – Supervisorial District 1

Dear Placer County Community Development Resource Agency,

I am writing to express the concerns of myself and fellow residents regarding the rezoning sites for Supervisorial District 1, specifically, 8165-8167-8169-8101 East Drive, Roseville.

Alarmingly, we have discovered this rezoning proposal has a two year history and our small neighborhood has not been notified. Confirmed only one (1) neighbor received a letter from the County on 2/8/2024 and the public yard posting was set on the property of 8101 East Drive on 2/9/24. Over the weekend, we hit the pavement to spread the word. **Attached is a petition from our neighborhood. The 115 signatures are person(s) directly affected by this proposal.** Original signatures arriving via Fedex to this address above on 2/13/24, by 8:30am, and request acknowledgement during the 2/13/24 Board of Supervisors meeting. Tracking # 7751 5078 2574

491-1

Our concerns of adding high density housing to East Drive, Roseville, our secluded, small, agricultural neighborhood include emergency & social services resources, county transportation services, wildlife preservation, traffic on rural streets, insufficient school capacity, property value impacts, sites located next to agricultural properties and safety concerns. Important to note, the proposed zone change is not consistent with the area. We have large acreage parcels, with livestock.

We have moved to this location to experience the country lifestyle and be safe. We feel that this would impact our quality of life at home or financially burden us if we need to move.

By signing this petition, we, the undersigned residents of the neighborhood respectfully request these properties to remain zoned as-is.

Sincerely,

Liz Wray

Liz Wray 2090 Central Ave Roseville, CA 95747

Cc: Board of Supervisors boardclerk@placer.ca.gov, Project Planner, Kally Kedinger- Cecil kkedinge@placer.ca.gov, Supervisor, Bonnie Gore supervisorgore@placer.ca.gov, Draft Environmental Impact Report cdraecs@placer.ca.gov

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

Placer County has identified 2 properties as 'rezone candidates' to meet the State's RHNA. The new zoning for high density would establish minimum 20 units/acre, maximum 30 units/acre.



D

The proposed zone change is inconsistent with the comprehensive plan. Concerns include emergency service support, transportation services, reserve and wildlife preservation, traffic, schools impact, decreased property values and safety concerns. Additionally, this zone change is not consistent with the area, rural lifestyle and livestock.

We, the undersigned, would like these properties removed from consideration and remain zoned as-is.

Name	Address	Phone Number	Signature
Melinda Ortiz Melinda Ortiz	8060 Milnes Ave Roseville	916 768 3362	MOrtiz
Kelly Munoz	8051 Milnes Ave. Roseville CA	(916) 761-4593	

1

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

NAME	ADDRESS	PHONE #	SIGNATURE
Larry Viegas	2255 Carol Ln Roseville, Ca 95747	916 601 2606	
Jennifer Hartl	2333 Central Ave. RSVL, CA 95747	916-768-0424	
Cheyenne Guzzi	2415 Central Ave, Roseville, CA 95747	(916) 708-3412	
Robert Price	2419 Central Ave, Roseville, CA 95747	(916) 547-6586	
Susan Mathis	2375 Central Ave Roseville CA 95747	916-709-2374	
Tom Mathis	2375 Central Ave Roseville CA 95747 (2 parcels)	916-709-6166	
Robert Thompson	8170 Brady Lane Roseville, CA 95747	916-782-6669	
Barbara Thompson	8170 Brady Lane Roseville, CA 95747	916-782-6669	
Michal Nazke	2300 Central Ave Roseville, CA 95747	916-782-6558	
Mike Nazke	8100 Milnes Ave Roseville, CA 95747	916-212-7223	
Connie Peterson	2325 CENTRAL AVE ROSEVILLE, CA 95747	916-765-1423	
Dale Peterson	2326 CENTRAL AVE ROSEVILLE, CA 95747	916-783-8523	
LAURA Bullard	2065 CAROL LANE ROSEVILLE, CA 95747	916-765-7903	
Eileen Lawson	2581 Central Ave Rsvle CA 95747	916-768-3062	

2

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

Marissa Canales	8145 East Drive, Roseville, CA 95747	000-925-980-9906	Marissa
CHARLES MARSH	8140 EAST DR ROSE CA	916-878-0701	
Martha Bullard	2065 Carol Lane	916 782-6932	Martha Bullard
Kim Jenkins	2089 Carol Lane	916 782-4975	
Isidor Plarisan	2123 Carol Lane	916-208-3824	
Karen Plarisan	2123 Carol Ln	916-204-3824	Karen
Lois Anderson	2219 Carol Ln	916-765-4771	Lois
CHARLES ANDERSON	2219 CAROL LN	(916)390-1217	
Molly Plarisan Molly Plarisan	2170 Central Ave	916-759-4601	Molly Plar
WALTER NAAKE	2300 CENTRAL AVE.	916-782-6558	Walter Naake
Sharon Naake	8100 Milnes Ave	916-759-8250	
Carole Foote	2175 central Ave.	(916) 782-3075	Carole Foote
Carl Foote	2175 Central Ave.	(916) 782-3075	A. Carl Foote
Donna Erickson	2163 Central Ave	916 918 9435	Donna M Erickson

3

14.

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

NAME	ADDRESS	PH. NUMBER	SIGNATURE
Alice Jenkins	2089 Carol Lane	916 742-2432	alice jenkins
Sherrill Renfro	2021 Carol Ln.	916-521-5568	Sherrill Renfro
John Renfro	" "	916-996-6453	John Renfro
KAREN NAULT	2060 CAROL Lane	916-768-7697	Karen Nault
Michelle Walton	2147 Carol ln	916-215-2230	
Michael Walton	2147 Carol Lane	916-300-1517	
Loren Schutte	2180 Carol Lane	916 899 1390	
Dona Riolo	2180 Carol lane	9168999326	
Addie Schutte	2180 Carol lane	916 605 9332	Addie Schutte
Jerry McCausland	2180 Carol Lane	916 314-3345	
Chelsea Andersen	2123 Carol lane	530-263-4634	Chelsea A
Linda Webb	8020 East Dr	9167054071	Linda Webb
Terry Webb	8020 East Dr.	9167686682	Terry Webb
BARBARA COOPER	2249 BASELINE	916-789-1576	Barbara Cooper

4

14

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

NAME	ADDRESS	PHONE #	Signature
Miguel Lopez	2111 Bass Lake Rd	916-868-9680	
Duane Collins	2121 Central Ave	916-412-4160	
Darcie Pillsbury	1724 Evergreen Dr	916-660-2053	Darcie Pillsbury
Kristin Cox	100 Triple Oak Ct	916-532-7834	Kristin Cox
Branden Cox	100 Triple Oak Ct	916-532-7846	Branden Cox
Claudia D. Browning	1335 Providence Way	916-532-7838	Claudia Browning
Darcie Pillsbury	2201 Central Ave	916-783-5973	Darcie Pillsbury
DAVID Pillsbury	2201 CENTRAL AVE	916-783-5973	David Pillsbury
Shannon Browning	1633 Alnwick Dr	916-532-7831	Shannon Browning
Stephen Browning	1335 Providence Way	916-532-7833	Stephen Browning
LIZ BUZZARD	1003 Old Mill Circle	916-209-8016	Liz Buzzard
TIM BUZZARD	1003 Old Mill Circle	916-209-0360	Tim Buzzard

5.

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

Robert Ericksen	2163 Central Ave	916 918 9435	Robert Ericksen
Trina Knutsen	2073 Central Ave	916-474-9952	T. Knutsen
Tiffany Latino	2050 Central Ave	916-799-3126	Tiffany Latino
Tony Latino	2050 Central Ave	916-831-7999	Tony Latino
BRIANNA LATINO	140 Ivy st	916-719-0261	Brianna Latino
Liz Wray	2090 Central Ave	9164084135	Liz Wray
Lisa Scranton	2195 Carol Ln	916 847-0050	Lisa Scranton
Chad Erickson	2185 Central Ave	916-847-5908	
Pauline Y. Sakai	2151 Baseline Road	916-646-4098	Pauline Y. Sakai
Karen Calkins	2121 CENTRAL AVE	9164124626	Karen Calkins
TAYLOR PLARISAN	2170 CENTRAL AVE	916 580 9563	TPl
Laura Ball	8109 Oak Ave	916-849-5020	

6

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

Robert Price	2419 Central AVE	916.547-6586	
Rebecca A. Butts	2580 Central Ave	9166472-5447	
Randall V. Butts	2580 Central Ave	916 8953235	
Paul Horton	2580central Ave	916 450 3551	
Anuliza Horton	2580 Central Ave	916 9143357	
Jeremy Lawson	2686 Central Ave	916 765-3225	
Michelle Lawson	2686 Central Ave	9163001120	
Daniel Latino	216 Chatswood ct	916 849-2034	
Kalia Xiong	216 Chatswood Ct	916 267-8950	
Sharon Garsee	8180 East Dr	916 216-0891	
JASMEET LEHIL	2041 CENTRAL AVE	916	

7

10

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

NAME	Address	Phone Number	Signature
Michael Munoz	8051 Miners Ave. Roseville CA	(916) 761-4032	Mike Munoz
Theresa Finger	8080 Miners Ave Roseville CA	(916) 212-0045	Theresa Finger
WILLIAM FINGER	8080 MINERS AVE ROSEVILLE CA	916) 202 9158	William M Finger III
TRAVIS LAMMERS	8145 EAST DRIVE ROSEVILLE CA 95747	916 749 0353	
JASMEET LEHIL	2041 CENTRAL AVE ROSEVILLE, CA 95747	916 462 2045	JS Lehil
Benbania Iaguinas	2391 baseline RD Roseville, CA 95747	(916) 600-7837	
Militza Perez	2391 baseline Rd Roseville, CA 95747	(951) 496-8380	
DAN WAECHTER	2377 BASELINE RD CA	916) 662-1696	DAN WAECHTER
CHRIS DRIESSEN	~~ROSEVILLE RD CA~~ 2212 LONGVIEW DR	916 599 1668	
MARTHA DRIESSEN	2212 LONGVIEW DR	303-887-7203	
Ted Klein	2216 Longview Dr.	916 896 4364	
Jesse Jones	2238 Longview Dr	916 300 7840	
Olivia Jones	2238 Longview Dr	916 521 1216	
Elaine Fridey	2229 Americana Dr	916 300-6145	

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

Name	Address	Phone Number	Signature
Rick Blenio	2025 Mineral Springs Dr	916-755-1055	Rick B
Trenten Baumann	503 Sammy Way	916-792-4373	Trenten Baumann
Rebecca Rubin	2025 Mineral Springs	916 289 1619	R
George Wang	1707 Pinion Dr. Roseville	408-666-4180	
David Vendiron	200 Myrtle Ct. Roseville	9168682402	
Perla Gámez	200 Myrtle Ct Roseville	9168682402	
Laura Gamez	200 Myrtle Ct. Roseville	9168682402	
Andrew DelGreco	1833 Ambridge Dr. 95747	7168170505	
DONE HENSEN	621 OAK Borough AVE	9167842981	

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

Jeffrey Lawson	2581 CENTRAL AV ROSEVILLE, CA 95747	916-768-3064	
Alex Sfrengeu	2291 Central Ave	916 257 5661	
Ana Sfrengeu	2291 Central Ave	916.223-8130	A. Sf
Jacqueline Sfrengeu	2291 Central Ave.	916 220-4620	Jacqueline Sfrengeu
Joseph Sfrengeu	2291 Central Ave	916 802 6608	J. Sfrenger
Hayden Hartl	2333 central Ave	916-305-3817	
Scott Peterson	2325 Central Ave	916-532-6067	
Larry Weaver	2090 Central Ave	916-406-4515	

10

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

Placer County has identified 2 properties as 'rezone candidates' to meet the State's RHNA. The new zoning for high density would establish minimum 20 units/acre, maximum 30 units/acre.



The proposed zone change is inconsistent with the comprehensive plan. Concerns include emergency service support, transportation services, reserve and wildlife preservation, traffic, schools impact, decreased property values and safety concerns. Additionally, this zone change is not consistent with the area, rural lifestyle and livestock.

We, the undersigned, would like these properties removed from consideration and remain zoned as-is.

Name	Address	Phone Number	Signature
Bunny Marsh	5340 EAST DR ROSEVILLE CA 95747	916-752-4543	Bunny Marsh
TRENT CANALES	8145 EAST DR ROSEVILLE, CA 95747	916-622-2152	

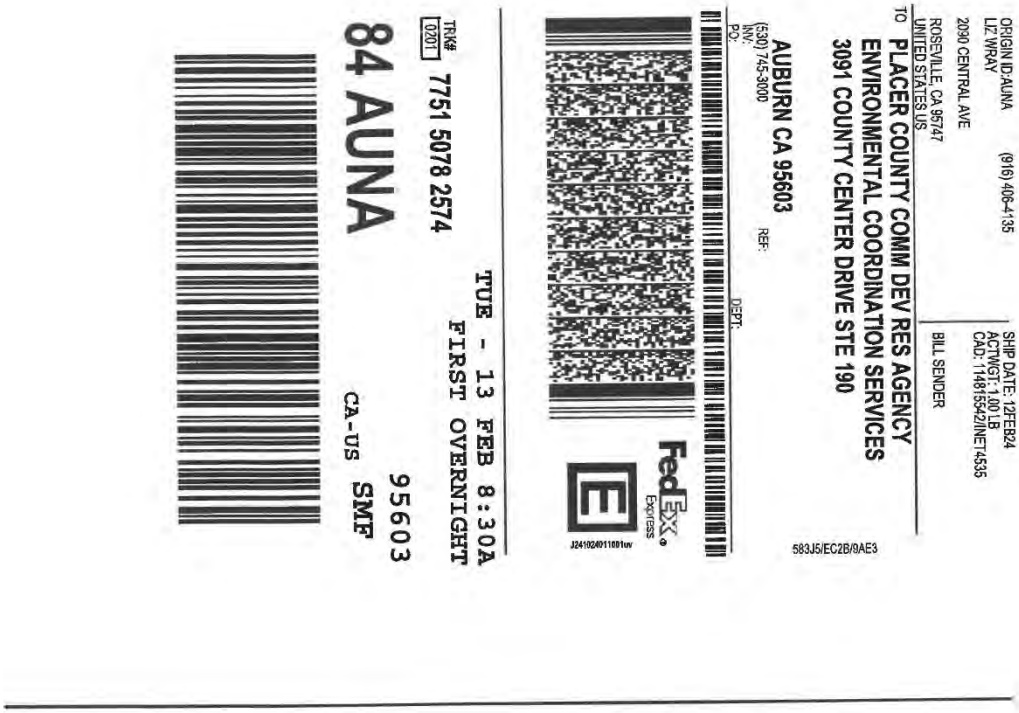
2.

Petition to Placer County Community Development Agency

Re: Housing Needs Rezone Program - Supervisorial District 1

NAME	ADDRESS	PHONE #	SIGNATURE
RICHARD PORTA	2108 CAROL LANE	(916)797-3625	Rich Porta
BETTY PORTA	2108 CAROL LANE	(916)241-3289	Betty Porta
Karly Sahr	590 I ST LINCOLN	9165809565	K Sahr
Cory Sahr	590 I St. Lincoln	9163168199	C Sahr

12



ORIGIN ID:AUNA (916) 406-4135
LIZ WRAY
2090 CENTRAL AVE
ROSEVILLE, CA 95747
UNITED STATES US

SHIP DATE: 12FEB24
ACTWGT: 1.00 LB
CAD: 114815542/INET4535

BILL SENDER

TO **PLACER COUNTY COMM DEV RES AGENCY**
ENVIRONMENTAL COORDINATION SERVICES
3091 COUNTY CENTER DRIVE STE 190

AUBURN CA 95603
(530) 745-3000
INV:
PO:
REF:
DEPT:

583J5/EC2B/9AE3

J241024011001uv

FedEx Express

TUE - 13 FEB 8:30A
FIRST OVERNIGHT

TRK# 0201 7751 5078 2574

84 AUNA

95603
CA-US SMF

After printing this label:
CONSIGNEE COPY - PLEASE PLACE IN FRONT OF POUCH
1. Fold the printed page along the horizontal line.
2. Place label in shipping pouch and affix it to your shipment.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of $100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of $100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is $1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

LETTER 491: LIZ WRAY

Response to Comment 491-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, Master Response 4 – Traffic Safety, and Master Response 6 – Impacts to Local Schools.

The petition has been forwarded to the decision makers for their consideration.

Letter 492

From: Kally Kedinger-Cecil
To: Placer County Environmental Coordination Services
Subject: FW: Rezoning Proposal-Placer County District 1-Dry Creek Community
Date: Monday, March 4, 2024 8:26:16 AM

From: Susan Yomogida <susan.yomogida@me.com>
Sent: Saturday, March 2, 2024 7:42 AM
To: Kally Kedinger-Cecil <KKedinge@placer.ca.gov>
Cc: Supervisor Gore <SupervisorGore@placer.ca.gov>; Landon Wolf <LWolf@placer.ca.gov>; senator.niello@senate.ca.gov; Mama Yomogida <susan@yomogida.net>
Subject: Rezoning Proposal-Placer County District 1-Dry Creek Community

Dear Ms. Kedinger-Cecil:

492-1

I am writing you regarding the proposal to change the current Dry Creek Community Plan from the current rural low density plan to include high density residential dwellings. I am including District 1 Supervisor Bonnie Gore, her Chief of Staff Landon Wolf, and California State Senator for District 6 Roger Niello on this email. Senator Niello is included as I was informed Placer County is mandated by the State of California to find additional suitable high density housing locations.

I invite all of you to visit our community, located on the southwest side of the City of Roseville, in unincorporated Placer County, not on a quiet Saturday or Sunday, but at the peak commute hours during the week, or when the K-8 school on Cook Riolo Road has families coming and going. Please drive around and view the proposed sites, and note the land lots. Our community is comprised of individual homes with dogs, cats, birds, cows, horses, goats, sheep, pigs, and a host of wildlife. We grow fruits, vegetables, have vineyards, etc. Included in our community is the Morgan Creek development with higher density homes, as well as other newer higher density projects that were approved by the County as fit into the Dry Creek plan. Please note on your drive that our roads are two lane rural roads. There is one signal light at the K-8 school to allow some protection to the students walking, riding bicycles, as well as buses and cars entering and leaving the school. Many of our roads are single lane. We have one Placer County Sheriff substation at the former Dry Creek Elementary School site. We have one fire station run by CDF with a few paid firefighters/EMT as well as volunteer firefighter staff. We do not have Roseville City services for police, fire/medical emergencies.

I have lived in the Dry Creek community most of my life. I grew up in this community, attended Dry Creek Elementary and Roseville High School, participated in 4-H, swam and fished Dry Creek, rode horses into town as a youth, worked at Denio's, and was a typical "country kid". As a child, we were 3 miles out of town, and now the City of Roseville has grown out beyond us. After college, my husband and I moved our family back to Dry Creek Community for rural living. We experience power outages from PG&E which means our wells won't work, and surface water issues during high volume rainy times, all of which we chalk up to "country living". Most of our neighbors

have either been here for several years, or are their children who have returned. My second daughter is the latter, returning with her husband to our community, My hope is that my other children or grandchildren will have the opportunity to live a rural agricultural life. I know quite well the cost of housing and need for higher density housing, as well as affordable housing for purchase. I hear my children and worry for my grandchildren. Their concerns also include pollution, water availability, and global warming which increases with more concrete and asphalt.

492-1 cont.

Dry Creek community is not a good location for high density housing, at least not at the locations currently being reviewed on East Avenue, Vineyard Road, Cook Riolo Road and PFE Road. Other lots will follow suit if the new high density housing is approved. Our two lane roadways would not support increased traffic. Our current public safety (Sheriff substation and CDF fire department) could not adequately protect our community Our rural community would disappear. Alternate locations need to be examined. Please visit our community. Please vote no and protect us.

Your constituent,
Susan Yomogida

LETTER 492: SUSAN YOMOGIDA

Response to Comment 492-1

Please see Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 4 – Traffic Safety. It is also noted that, as discussed under Impact 10-1 in Chapter 10, Fire Protection and Wildfire, of the Draft EIR, Placer County Fire Department personnel confirmed in correspondence with the County that the existing fire stations that would serve and are located proximate to the rezone sites would be adequate to serve the proposed rezone sites. Rezone sites in Dry Creek would be served by Dry Creek Station 100, located at 8350 Cook Riolo Road. Furthermore, a new fire station is planned to be developed as part of the Placer Vineyards Specific Plan.

Letter 493

From: Jaime Zezini
To: Placer County Environmental Coordination Services
Subject: Land next to Cavitt Jr. High
Date: Thursday, March 7, 2024 9:23:20 AM

493-1

Hello -
I am emailing with concerns over the land next to Cavitt Jr. High. This area is not appropriate for a housing community. The natural habitat and Linda Creek run right through this land. I have a house next to Linda Creek and we had so many issues with the county on what we could put NEXT to the creek, not even touching the creek or making any modifications. I find it very strange that the county is going to consider a development anywhere near this creek. My concerns also encompass the surrounding street infrastructure and the amount of traffic this would bring to our already busy intersections. Please reconsider your decisions to put this development here and listen to the residents who travel through this area on a daily basis. ALSO, our children …. Our children that ride their bikes and go to cavitt for school. This development would make it very dangerous for the children going to school at cavitt. They wouldn't be able to ride their bikes or walk safely with all the added traffic. We live here because of the small community and we'd like it to stay that way.
Thank you,

Jaime Zezini
Executive Consultant, Rodan + Fields
916-300-0990
https://jzezini.myrandf.com/

LETTER 493: JAIME ZEZINI

Response to Comment 493-1

Please see Master Response 1 – Non EIR/Administrative Issues and Master Response 4 – Traffic Safety. Additionally, the County has secured grant funding to install a new enhanced crosswalk for pedestrians crossing Fuller Drive near Cavitt Junior High School. The grant funding is unrelated to the proposed project and will be installed whether or not Rezone Site #26 is rezoned as part of the proposed project. That new crosswalk could alleviate the concerns raised by the commenter.

Regarding Linda Creek concerns, please see Response to Comment 52-2.

TCS
PLANNING | DESIGN
PROJECT MANAGEMENT

Letter 494

March 18, 2024

Chris Pahule, Placer County Planning Director
Placer County
3091 County Center Drive
Auburn, CA 95603

Subject: **Housing Needs Rezone Program – Public Comment Letter**

Dear Mr. Pahule:

Our firm, TCS Planning, provides land use planning and entitlement support on a variety of large-scale and infill residential projects throughout Sacramento County. As a consulting company we represent an adjacent property owner. The property adjacent to the Whispering Creek subdivision at 8300 Cook Riolo Road (APN 023-240-077-000 & 023-240-038-000) has requested to be a candidate rezone property. This request changes the zoning designation to 20 – 30 units per acre which would allow and additional 80 to 120 units on the parcels. Consideration of such a project at this location is inappropriate on many levels which I will summarize below.

Property Specific Concerns

Traffic and Circulation

494-1

The DEIR Traffic component considers the two parcels referenced above individually and lacks specificity to the site. When a project moves forward, it is highly likely that it will consist of both parcels referenced above which differs from how the DEIR considers the zoned area. What type of project specific traffic analysis will be required when a project comes forward? There appears to be a significant gap in the analysis to rezone the sites when compared to what would normally be required for a rezone if it was part of a project application.

This proposed location as a rezone property is along Cook Riolo Road, a two lane, collector road with a speed limit of 35 miles per hour. As this newly proposed site will be targeted for low and very-low income households, these families and individuals will be reliant on walking and biking. Many areas along Cook Riolo Road are unimproved without sidewalks which can make it treacherous for pedestrian and bicycle traffic.

Allowing an additional 120 units would will add 180 vehicles along Cook Riolo Road, an already congested roadway system. Being across from Dry Creek Joint Elementary School, the traffic during morning and afternoon school hours is extremely problematic. Additionally, given the existing circulation pattern, the site would only have one point of connection for ingress/egress with Cook Riolo Road. This would not meet fire standards and would make the project unbuildable.

TCS
PLANNING | DESIGN
PROJECT MANAGEMENT

Neighborhood Compatibility
The proposed site is narrow at only about 315 feet wide and is encumbered by utility and access easements to the benefit of additional parcels that further narrows the parcels. In order to provide adequate parking for a development between 80 and 120 units, the building envelope would be significantly impacted, which would result in the construction of a building at least four stories tall. A four-story building is incompatible with the adjacent properties that are all single-story homes on large lots. While development has occurred in the surrounding area, the County has thus far done a good job of approving projects in keeping with the rural nature of the area.

Noise
The Dry Creek-West Placer Community Plan states "where noise levels have a potential to be in excess of normally acceptable CNEL levels, landscaped setbacks should be considered versus sound walls for noise mitigation"[1] Due to the constraints of the site and the proposed density, a sound wall would be required for mitigation with surrounding differing land-uses. A sound wall would diminish the character and rural aspect of the plan area.

494-1 cont.

Conclusion
The DEIR provides a superficial analysis of the impacts associated with buildout under the proposed zoning. Given the lack of specificity, it is inappropriate to rezone parcels and lose the discretionary power during a project approval in the future.

We appreciate the opportunity to provide comment and diligent and comprehensive efforts by Placer County staff to bring quality new housing at all income levels to the Placer Region. There are other sites within the County that have not been considered and may be more suited for the rezoning program.

We are available to discuss further with the County Staff at your convenience.

Respectfully,

TCS Planning

Laura Zuckerman

Laura Zuckerman
Associate Principal

[1] Dry Creek/West Placer Community Plan, Placer County Planning Department, 1994

LETTER 494: LAURA ZUCKERMAN

Response to Comment 494-1

Please see Responses to Comment Letter 21.

HOUSING ELEMENT SITES REZONE PROJECT
DRAFT EIR COMMENT HEARING SUMMARY Letter 495

Date: February 22, 2024
Time: 10:00 AM
Location: Placer County Community Development Resource Center
Planning Commission Hearing Room
3091 County Center Drive
Auburn, CA 95603

Verbal Comments (arranged in order of "appearance" of commenter):

Planning Commission Initial Comments

Commenter 1 (Dan Woodward)

495-1
- Commenter asks about the difference between a streamlined project and a normally processed project associated with a rezone site.
- Commenter asks who determines whether or not to streamline a project, and if/how the public can influence that decision.

Commenter 2 (Anthony DeMattei)

495-2
- Commenter requests clarification on the affordability of the future housing that would be built on the rezone sites.
- Commenter asks how Senate Bill (SB) 330 and SB 10 will interact with the proposed project and affect the project's relationship to public transit.
- Commenter asks about the timeline for the proposed project and the Housing Element cycle (i.e., 2021 through 2029).
- Commenter asks about a potential conflict with SB 10 and SB 8 related to how accessory dwelling units (ADUs) affect the affordability requirements for projects.

Public Comments

Commenter 3 (Ron Seaverson)

495-3
- Commenter notes that low-income housing has not been adequately planned for or constructed by the County.

495-4
- Commenter expresses opinion that the Draft Environmental Impact Report (DEIR) was not thoroughly conducted, and windshield surveys are not sufficient to evaluate potential impacts to biological resources.

495-5
- Commenter notes that Site #26 hosts wildlife and plant species, and contains several vernal pools and a creek, and states that because of the on-site wetlands, on-site construction would violate policies contained within the County General Plan and Granite Bay General Plan.

495-6
- Commenter notes that construction within a floodplain is rarely recommended.

495-7
- Commenter requests that Site #26 be eliminated from consideration for rezoning.

Commenter 4 (Al Lashbrooke)

495-8
- Commenter discusses the potential effects of Proposition 1 on the proposed project, such as less money within the County.

Commenter 5 (Alice Jankens)

495-9
- Commenter is concerned that development of Site #8 near East Drive, Bay Line, and Carroll Lane would create a safety issue due to increased crime within low-income neighborhoods.

495-10
- Commenter is concerned about hazards to the Dry Creek neighborhood, including traffic hazards to children and senior citizens, noise pollution, dust, and threats to wildlife.

495-11
- Commenter notes that special-status wildlife species, including the valley elderberry longhorn beetle (VELB), American condor, and migratory birds inhabit the area.

Commenter 6 (Holly Thomas)

495-12
- Commenter declares the proposed project is not safe for the Granite Bay area on Auburn/Folsom Boulevard.

495-13
- Commenter cites government codes from the Regional Housing Needs Assessment (RHNA) plan that would be violated by the proposed project, including the following:
  - Government Code 6583.2(b)(5), Off-Site Improvement Standards;
  - Government Code 6589.1 Job-Housing Balance;
  - Government Code 65970 Adequate School Facilities; and
  - Government Code 6558404(e), Emergency Evaluation Route Capacity.
- Commenter expresses opinion that Sites #23 and #25 should not qualify as viable sites for multi-family housing as defined in the RHNA.
- Commenter agrees with previous critiques and states that the California Department of Housing and Community Development (HCD) should improve to ensure communities can plan adequate housing.

Commenter 7 (Desiree Hennesy)

495-14
- Commenter asks about acreage discrepancies on County documents (i.e., the DEIR and current rezone site lists handed out at public meetings) associated with Site #34.

495-15
- Commenter is concerned about noise pollution during construction activities and how such noise would affect people working from home.

495-16
- Commenter notes that a California spotted owl has been observed on Site #34, which is a wildlife species currently pending review to be designated as Threatened.

Commenter 8 (Teresa Aguilar-Finger)

495-17
- Commenter says development of Site #8 would increase traffic and disturb the rural character of the area.

495-18
- Commenter describes strawberry fields and local farmer's markets that would be impacted by the proposed project.

Commenter 9 (Brenda Timmons)

495-19
- Commenter says development of Site #8 would disturb the rural character of the area.

495-20
- Commenter is concerned about increases to traffic and the associated impacts to air quality.





Commenter 10 (Robert Smith)

495-21 • Commenter discusses the rezone sites located on Cook Riolo Road (Sites #9 and #10) and how development of the sites as proposed would conflict with the housing densities typical of the area.

495-22 • Commenter points out that public transit services and sidewalks do not exist on Cook Riolo Road.

Commenter 11 (Monica Goldminer)

495-23 • Commenter says the development proposed for Sites #9 and #10 would not be compatible with rural infill development in the area.

495-24 • Commenter is concerned about increases in traffic.

Commenter 12 (Melinda Ortiz)

495-25 • Commenter expresses opposition to the proposed project.

495-26 • Commenter has concerns about increased crime rates associated with low-income housing developments, as well as increases to traffic.

Commenter 13 (Ron Volley)

495-27 • Commenter points out dwelling unit per acre (du/ac) calculation errors on the rezone site list handed out at the meeting with regard to Site #17.

495-28 • Commenter says the DEIR is missing evaluation of social impacts and impacts to social infrastructure (such as bike paths, street lights, sidewalks, restaurants, offices, etc.).

Commenter 14 (Leslie Davidson)

495-29 • Commenter has concerns related to sites in District 5, and the number of units proposed for development within District 5.

495-30 • Commenter has concerns related to impacts to healthcare services due to increased population.

Commenter 15 (Jim Miller)

495-31 • Commenter has concerns related to fire and police services and a lack of staff to respond to emergency situations.

495-32 • Commenter has concerns related to increases in traffic.

495-33 • Commenter highlights proximity of the Sheridan rezone sites to railroad tracks.

495-34 • Commenter notes the crop duster airplanes that fly overhead the Sheridan area.

495-35 • Commenter has concerns about development on the rezone sites having an adverse effect on scenic vistas in the area.

Commenter 16 (Rick Reidman)

495-36 • Commenter has concerns about safety issues related to traffic increases, especially in the area around Sites #7 through #10.

495-37 • Commenter has concerns about inadequate staffing in local fire departments.

Commenter 17 (Laura Bullard)

495-38 • Commenter says the proposed project would disturb the rural lifestyle of the Dry Creek community.

495-39 • Commenter has concerns related to lack of staffing within the local fire departments.

495-40 • Commenter is concerned about potential flooding and drainage at Sites #7 and #8.

Commenter 18 (Jennifer White)

- Commenter questions the potential economic impacts associated with hiring additional fire and police department employees. 495-41
- Commenter has concerns related to school capacity within the Penryn and Loomis areas. 495-42
- Commenter notes that sewer and water line infrastructure has not been adequately planned for or constructed, and asks about the source of funding for such improvements. 495-43

Commenter 19 (Tim McGuire)

- Commenter suggests that the proposed project appears valuable, but is ultimately a waste of time and money.
- Commenter highlights the low percentage of affordable housing as compared to the total number of proposed units. 495-44
- Commenter suggests using ADU incentives to increase the amount of housing, similar to actions taken in Napa County.

Commenter 20 (Jane Nagre)

- Commenter states that the address of Site #23 was changed on County documents between the February 13th meeting and the current meeting. 495-45
- Commenter has concerns about safety hazards caused by an increase in traffic associated with development of the rezone sites. 495-46
- Commenter notes that Granite Bay currently has limited water resources. 495-47
- Commenter has concerns about air quality, noise pollution, and light pollution. 495-48
- Commenter notes that the proposed project would disturb the current rural character of the area. 495-49

Commenter 21 (Sandy Harris)

- Commenter expresses opinion that the increase in population in the Granite Bay area and the associated impacts have not been adequately planned for, or mitigated, within the DEIR. 495-50

Commenter 22 (Richard Birchloft)

- Commenter notes that the Dry Creek area does not have sufficient services or infrastructure to support high-density residential development and the associated population increase. 495-51
- Commenter specifies that high-density development on Sites #9 and #10 would not be compatible with existing rural residences on Cook Riolo Road. 495-52

Commenter 23 (John Shingle)

- Commenter expresses concerns regarding impacts to scenic vistas and noise pollution associated with the development of Sites #71 and #72. 495-53
- Commenter notes that a creek that connects to the American River divides the properties and has not been subject to protective erosion controls during construction in the area. 495-54

Commenter 24 (Wayne Nader)

- Commenter expresses opinion that the DEIR is inadequate to address the potential impacts of spot zoning associated with the rezone sites. 495-55
- Commenter has concerns regarding impacts to the visual character of the rezone sites, which would be changed by the proposed project. 495-56

495-57
- Commenter has concerns about impacts to public infrastructure in Auburn, particularly impacts to traffic, which the commenter says is not addressed in the DEIR.

495-58
- Commenter requests that County properties be considered as rezone sites for this project.

495-59
- Commenter notes that development sites within the Sunset Area Plan are located in a floodplain, and that residential developments, such as those proposed by the project, would be better suited within a more urbanized location, such as western Placer County near the City of Roseville.

Commenter 25 (Pete Davidson)

495-60
- Commenter says that Sites #58 and #67, near Florence Lane in the Auburn area, are not considered for rezoning under the proposed project, but is not confident that such property would not be affected in the future due to confusion around the site selection process.
- Commenter notes that the meeting was not adequately announced to the public through signs posted within the North Auburn community.

Commenter 26 (Sarah Spencer)

495-61
- Commenter requests that Sites #9 and #10 are removed from the list of rezone sites.

495-62
- Commenter has concerns about safety hazards caused by increased traffic at the Creekview Ranch School.

Commenter 27 (Mike Garabidi)

495-63
- Commenter disagrees with the County's significant urbanizing processes.
- Commenter sees political motivations in the decision to select sites through supervisor districts rather than established communities.

Commenter 28 (Kelly Marino)

495-64
- Commenter disagrees with the conclusion in the DEIR that Sites #71 and #72 are located within a High Fire Hazard Severity Zone (FHSZ), and says the sites should be evaluated as Very High FHSZ.

495-65
- Commenter has concerns about increased traffic associated with the proposed project, especially related to a hazardous roundabout on Lincoln Way.

495-66
- Commenter notes the riparian area and associated stream located near Sites #71 and #72 should be closely evaluated.

Commenter 29 (Richard Shalaise)

495-67
- Commenter expresses opposition to the proposed project and disapproval of the current DEIR, requesting that the DEIR be redone.

Commenter 30 (Tiffany Latino)

497-68
- Commenter expresses opposition to rezoning of Site #8 due to the on-site strawberry field.

495-69
- Commenter notes the wildlife species that would be impacted by the proposed project, including turkeys, deer, fox, raccoon, possum, skunk, squirrel, and coyote.

495-70
- Commenter has concerns about increased traffic on Base Line Road, Foothills Boulevard, and Cirby Way.

495-71
- Commenter expresses concerns about schools already being at capacity.

495-72
- Commenter is concerned about the inadequate staffing of the local fire department.

495-73
- Commenter notes existing problems with the electricity grid and power outages that would be exacerbated by additional development on Site #8.

Commenter 31 (Marisa Canalis)

495-74
- Commenter discusses lack of proper drainage in the area surrounding Site #8.

495-75
- Commenter notes a well for the commenter's property is located on Site #8, the relocation of which would have a significant financial impact on the commenter and could impact the infrastructure of the area.

Commenter 32 (Anne Hendrickson)

495-76
- Commenter discusses Chapter 4, Air Quality and Greenhouse Gas (GHG) Emissions, of the DEIR. Specifically, commenter identifies Sites #13, #17, and #18 as significant contributors to air quality impacts.
- Commenter discusses goals in the Penryn Community Plan related to protecting and improving air quality, as well as the integration air quality considerations into the planning process.
- Commenter discusses the identified significant and unavoidable impacts to air quality, and suggests that such impacts could be mitigated by incorporating low-density senior housing developments into the proposed project.

495-77
- Commenter suggests increasing the notification distance for the proposed project from the existing 300 feet.

Commenter 33 (Fred Doster)

495-78
- Commenter supports the proposed project and the efforts of the Planning Commission.

Commenter 34 (Laura McCaslin)

495-79
- Commenter asks about a potential time extension for the proposed project beyond May 2024.
- Commenter asks about details on the rezoning process and, if excess units exist, asks if rezoning efforts could be reversed.
- Commenter asks if the zoning map on the County's website would be updated to reflect the most current rezone site list.
- Commenter asks how annual property taxes would be affected by the proposed project, and if they would be raised to affect property owners in the area.
- Commenter asks what other avenues for public comment exist within the State to comment on the mandated housing requirements.

Commenter 35 (Amber Beckler)

495-80
- Commenter notes that Site #26 does not meet the eligibility criteria under Government Code 65583.2 because the site is more than 10 acres and asks what authority the County has to include it in the DEIR.
- Commenter asks if, since Site #26 is already zoned Commercial Planned Development (CPD) with a Design Corridor (DC), if a rezone would violate the County General Plan and require an individual EIR.
- Commenter asks for clarification on the size of Site #26 due to inconsistent acreages within County documents.
- Commenter asks why DEIR did not consider an increase in density on parcels currently zoned Residential Multi-Family (RM).
- Commenter asks why County-owned parcels were not considered in the DEIR.





Commenter 36 (Kerry Fendick)

- Commenter notes that the distribution of the proposed units across the Placer County communities is unequal; specifically, that the community of Penryn was assigned 24 percent of the units despite being a small community. 495-81
- Commenter expresses confusion about the distinction between rezoning and zoning overlays, and the public notification processes.

Commenter 37 (Cheryl Berkhama)

- Commenter notes that the NOP associated with the proposed project did not list every rezone site. 495-82
- Commenter notes that, because the rezone site list has been refined by the Board of Supervisors, the DEIR project description has been revised outside of the legal process.
- Commenter says the alternatives presented within the DEIR included County properties, but did not adequately evaluate the potential impacts associated with development of the properties. 495-83

Commenter 38 (Sarah Jenkins)

- Commenter has concerns about impacts to infrastructure (e.g., hospitals, grocery stores, gas stations, public transportation, etc.). 495-84
- Commenter has concerns about increased crime associated with high-density low-income housing. 495-85
- Commenter has concerns about increased traffic near school zones. 495-86
- Commenter has concerns about availability of sheriff and police protection services. 495-87
- Commenter has concerns about property value decreases. 495-88

Commenter 39 (Richard Mulane)

- Commenter has concerns about increased traffic, especially at Sites #25 and #26, which are located near a school, and notes that area roads, including Douglas Boulevard, Auburn Boulevard, and Folsom Boulevard, are already congested. 495-89
- Commenter has concerns about safety hazards to school-going children due to increased traffic. 495-90
- Commenter has concerns about increased air pollution and noise pollution from increased traffic. 495-91

Commenter 40 (Diane Louise Alesi)

- Commenter notes that the DEIR should include evaluation of potential impacts to the mental and social health of the community. 495-92
- Commenter discusses SB 330 and the State's financial responsibility to projects imposed on a community. 495-93

Commenter 41 (Donna Delno)

- Commenter asks why the County parcels were not included as part of the DEIR. 495-94
- Commenter asserts that the RHNA numbers from the Sacramento Area Council of Governments (SACOG) are wrong.

Commenter 42 (Muriel Davis)

- Commenter notes that the County should request an extension from the State and should readdress the site selection process so that affordable housing units are not placed in rural areas. 495-95

495-96

- Commenter asks about any potential deed restrictions on the sites for use by local workers and local residents, similar to the Town of Tahoe.

Commenter 43 (Zenith Jones)

495-97

- Commenter notes that the Community of Sheridan does not have adequate services (such as hospitals, grocery stores, and public transit) to support high-density residential development.

495-98

- Commenter has concerns about potential property tax increases.

495-99

- Commenter has concerns about the number of cars per unit, and how to accommodate such an increase on the smaller sites.

495-100

- Commenter has concerns about the proximity of the proposed residences on the Sheridan sites to the railroad, and the dust created by passing trains that would affect the proposed residences.

Commenter 44 (Erik Freeman)

495-101

- Commenter requests rejection of the staff report, DEIR, and proposed project.

495-102

- Commenter notes that Site #26 is currently designated a scenic corridor, yet the DEIR dismisses potential impacts to aesthetics.

495-103

- Commenter notes that Site #26 is designated by the PCCP as containing oak woodland, savannah valley foothill riparian woodland, and VELB habitat.

Planning Commission Final Comments

Commenter 45 (Richard Johnson)

495-104

- Commenter asks whether the future development on the rezone sites, once selected, would be allowed by right.

495-105

- Commenter requests clarification on when environmental factors brought up during the meeting would be addressed and by whom (i.e., under CEQA or by the Design Review Committee).

495-106

- Commenter requests clarification on the final rezone site selection process.

Commenter 46 (Robyn Dahlgren)

495-107

- Commenter asks about how the property owners of Sites #9 and #10 could interact with the zoning designation changes in the future.
- Commenter asks about the 10-acre maximum of the rezone sites and why that limit was introduced.
- Commenter asks why County properties are not included in the list of potential sites.
- Commenter asks if there is a clear change control process for narrowing down the lists of potential sites as the proposed project progresses.
- Commenter asks about the concrete consequences of generally pushing back the proposed project, rather than asking for a time extension.

Commenter 47 (Richard Johnson)

495-108

- Commenter asks whether any of the potential rezone sites are under a Use Permit recently approved by the Planning Commission.

Commenter 48 (Dan Woodward)

495-109

- Commenter has concerns about the potential impacts to infrastructure.

- Commenter requests clarification on the streamlining process, as well as how the County's DRC meetings and appeals would play into the public's involvement in the proposed project.
- Commenter requests consideration of eliminating the streamlining process for specific development projects in the future in order to facilitate public comment.
- Commenter requests clarification on how Site #26 has been considered, given HCD's 10-acre limit.

495-110

Commenter 49 (Anthony DeMattei)

- Commenter requests clarification on the process of a programmatic EIR and whether future development projects would have to undergo further environmental review.
- Commenter requests clarification on the process associated with getting 75 percent of the State-mandated units in order to get an extension of time.
- Commenter discusses the idea that increased demand for fire protection services is not a CEQA requirement.

495-111
495-112
495-113

Commenter 50 (Robyn Dahlgren)

- Commenter expresses opinion that landowners should not have the right to change the nature or character of a rural residential community.

495-114

LETTER 495: VERBAL COMMENT SUMMARY

Response to Comment 495-1
Please see Master Response 1 – Non-EIR/Administrative Issues. It is also noted that any future projects proposed on rezone sites would be subject to a Subsequent Conformity Review and if this review determines a project would result in more severe impacts than identified in the Housing Element Sites Rezone EIR, then a focused CEQA analysis would be required to identify if the impacts could be mitigated or if the project would result in significant, unavoidable impacts.

Response to Comment 495-2
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-3
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-4
Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Response to Comment 495-5
Please see Response to Comment 52-2. As discussed in Chapter 5, Biological Resources, of the Draft EIR, implementation of Mitigation Measures 5-1(a) and 5-4(a) through 5-4(j) would reduce potential impacts to aquatic resources within Rezone Site #26 to a less-than-significant level.

Response to Comment 495-6
Please see Response to Comment 478-1.

Response to Comment 495-7
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-8
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 495-9
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-10
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 495-11
As detailed in the BRA (included within the Draft EIR as Appendix G), the biological resources analysis was conducted at a programmatic level. As a result, Madrone stated at the beginning of Section 6.0 – Mitigation for Potential Impacts to Sensitive Biological Resources that:

> "All parcels must comply with Mitigation Measure 6.1.1 below. Additional required mitigation measures will be based on which sensitive biological resources (including

> aquatic resources and special-status species) are documented within the parcel, or have the potential to occur within the parcel. We have provided a summary of the sensitive biological resources that may be present and mitigation measures for impacts to those resources for each parcel in Attachments C and D, but a final list will be developed as part of Mitigation Measure 6.1.1."

This requirement is carried forward as Mitigation Measure 5-1(a) of the Draft EIR. Implementation of Mitigation Measure 5-1(a) requires a field survey of the project parcels, during which any special-status species habitat must be documented. This would include noting whether or not elderberry shrubs occur within a particular parcel. Mitigation Measures for VELB are included in the Draft EIR (see 5-2h and 5-2i).

It should be noted that VELB refers to the beetle, not the elderberry shrub. Elderberry shrubs are in fact quite common, while the beetle is uncommon.

Note that "American condor" are extremely rare and only occur in areas of California where they have been reintroduced, such as Pinnacles National Park and Big Sur. Migratory birds do occur within the Dry Creek area and the Draft EIR includes mitigation measures protective of such species.

Response to Comment 495-12

Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 495-13

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-14

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-15

Impacts related to construction noise are discussed under Impact 7-1 within Chapter 7, Noise, of the Draft EIR. As discussed in Impact 7-1, the proposed project could generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Implementation of Mitigation Measure 7-1 would reduce the potential temporary noise impact. However, the effectiveness of the measure would vary from site to site and may not prevent ambient noise-level increases due to project construction from exceeding 5.0 dBA, the established threshold, relative to existing levels. This, however, may be achievable at several rezone sites, and would be determined at a later date should a residential development application be processed and reviewed by the County for a particular rezone site. As discussed in Impact 7-1, the EIR conservatively concluded that the potential impact would remain significant and unavoidable.

Response to Comment 495-16

Impacts related to California spotted owl are discussed under Impact 5-2 within Chapter 5, Biological Resources, of the Draft EIR. As discussed therein, with implementation of Mitigation Measure 5-2(aa), potential impacts related to California spotted owl would be less than significant.

Response to Comment 495-17
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 495-18
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 495-19
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 495-20
Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Impacts to air quality resulting from vehicle emissions attributable to potential future residential development on rezone sites are programmatically evaluated in Chapter 4.3 of the Draft EIR.

Response to Comment 495-21
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-22
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-23
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-24
Please see Master Response 1 – Non-EIR/Administrative Issues. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 495-25
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-26
Please see Response to Comment 495-24.

Response to Comment 495-27
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-28
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 495-29
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-30
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 495-31
As discussed under Impact XV-2 of the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR, increased property taxes associated with future residential development on rezone sites would contribute to County Public Safety funding, which can be used to offset increased demands placed on the Placer County Sheriff's Office (PCSO) as a result of increased population. Additionally, a limited number of rezone sites occur in the less developed areas of the County. Thus, the proposed project would not result in a need for new, or improvements to existing, sheriff protection facilities.

With respect to fire protection services, the following is stated on page 10-35 within Chapter 10, Fire Protection and Wildfire, of the Draft EIR:

> The approach to analyzing a project's impacts on fire protection services, pursuant to CEQA, is often misunderstood. Industry practice has often focused on any type of demand upon a fire department or district that may be generated by a project, such as an increased need for staffing, or the need for new firefighting equipment. These are important considerations, but they are not CEQA considerations per se. This important point can be seen by a careful reading of the language in Appendix G of the CEQA Guidelines (Section XV. Public Services). The language focuses on whether a project's increase in demand is such that a fire service provider would need to build new or expand existing governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives. The reason for this focus is that building new facilities, or expanding existing facilities, requires construction activities and disturbance of the physical environment, which is the focus of CEQA.

Nonetheless, it should be noted that the proposed project would not result in a need for new, or improvements to existing, fire protection facilities.

Response to Comment 495-32
Please see Response to Comment 495-24.

Response to Comment 495-33
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-34
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-35
Impacts related to adverse effects on scenic vistas were evaluated under Discussion Item I-1 within the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR. Therein, it was determined that because established scenic vistas are not located on or adjacent to the potential rezone sites, the proposed project would not have a substantial adverse effect on a scenic vista, and no impact would occur.

Response to Comment 495-36
Please see Master Response 4 – Traffic Safety.

Response to Comment 495-37
Please see Response to Comment 495-31.

Response to Comment 495-38
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 495-39
Please see Response to Comment 495-31.

Response to Comment 495-40
Impacts related to drainage patterns at the rezone sites were discussed under Discussion Item X-3 of the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR. As discussed therein, with implementation of Mitigation Measure X-1, impacts related to substantially altering the existing drainage pattern of the rezone sites would be less than significant.

Impacts related to flooding at the rezone sites were discussed under Discussion Item X-5 of the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR. As discussed therein, with implementation of Mitigation Measures X-7 through X-10, impacts related to impeding or redirecting flood flows, exposing people or structures to risk of loss, injury, or death involving flooding, or the release of pollutants due to project inundation would be less than significant.

Response to Comment 495-41
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 495-42
Please see Master Response 6 – Impacts to Local Schools.

Response to Comment 495-43
As discussed on page 3-6 within Chapter 3, Project Description, of the Draft EIR, sites on the proposed rezone list met the criteria from the Housing Site Inventory Guidebook prepared by the California Department of Housing and Community Development (HCD), including having access

to sewer and water infrastructure. In addition, please see Master Response 1 – Non-EIR/Administrative Issues and Response to Comment 81-3.

Response to Comment 495-44

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-45

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-46

Please see Master Response 4 – Traffic Safety.

Response to Comment 495-47

Please see Master Response 1 – Non-EIR/Administrative Issues. It should be noted that as discussed under Discussion Item XIX-2 within the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR, sufficient water supplies would be available to serve reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the proposed project would result in a less than significant impact related to water supply.

Response to Comment 495-48

Please see Master Response 1 – Non-EIR/Administrative Issues. Additionally, impacts related to creating a new source of substantial light or glare were discussed under Discussion Item I-4 of the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR. As discussed therein, with implementation of Mitigation Measure I-1, the potential impact would be less than significant.

Response to Comment 495-49

Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 495-50

As discussed under Discussion Item XIV-1 of the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR, the County's Housing Element is intended to accommodate anticipated growth and facilitate the development of new housing to meet the County's RHNA obligation share determined by SACOG for the 2021-2029 planning period. As such, the population growth caused by the proposed project would not be unplanned; to the contrary, it is specifically being planned for, with suitable sites for development identified and evaluated. The proposed project would be consistent with the General Plan, including the Housing Element, and applicable specific plans, as amended by the proposed project. Thus, the proposed project would not be considered to induce substantial unplanned population growth, and mitigation measures are not required.

Response to Comment 495-51

Please see Responses to Comments 115-3 and 495-43.

Response to Comment 495-52

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-53
Please see Response to Comment 495-35. In addition, potential impacts related to noise and vibration associated with construction and operation of potential future development associated with the proposed project are programmatically addressed in Chapter 7, Noise, of the Draft EIR.

Response to Comment 495-54
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-55
Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR.

Response to Comment 495-56
As discussed under Impact 1-3 within the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR, compliance with the Placer County Design Guidelines, the specific design guidelines contained in the relevant Community Plan for each site, and Article 17.54 of the Placer County Code would reduce potential impacts to the visual character of the project area due to future development of the rezone sites.

Response to Comment 495-57
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-58
Please see Master Response 3 – County-Owned Sites.

Response to Comment 495-59
Impacts related to flooding at the rezone sites were discussed under Discussion Item X-5 of the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR. As discussed therein, with implementation of Mitigation Measures X-7 through X-10, impacts related to impeding or redirecting flood flows, exposing people or structures to risk of loss, injury, or death involving flooding, or the release of pollutants due to project inundation would be less than significant.

Response to Comment 495-60
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-61
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-62
Please see Master Response 4 – Traffic Safety.

Response to Comment 495-63
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-64

Pursuant to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zones (FHSZs), the Draft EIR is accurate in identifying Rezone Sites #71 and #72 as being within a High FHSZ.

Response to Comment 495-65

Please see Responses to Comments 2-12, 2-14, and 174-2.

Response to Comment 495-66

As detailed in the BRA (included within the Draft EIR as Appendix G), the biological resources analysis was conducted at a programmatic level. As a result, Madrone stated at the beginning of Section 6.0 – Mitigation for Potential Impacts to Sensitive Biological Resources that:

> "All parcels must comply with Mitigation Measure 6.1.1 below. Additional required mitigation measures will be based on which sensitive biological resources (including aquatic resources and special-status species) are documented within the parcel, or have the potential to occur within the parcel. We have provided a summary of the sensitive biological resources that may be present and mitigation measures for impacts to those resources for each parcel in Attachments C and D, but a final list will be developed as part of Mitigation Measure 6.1.1."

This requirement is carried forward as Mitigation Measure 5-1(a) of the Draft EIR. Implementation of Mitigation Measure 5-1(a) requires a field survey of the project parcels, during which any sensitive habitats must be documented. Based on the findings, applicable mitigation measures set forth in the Draft EIR, including those pertaining to creeks and riparian habitat, would be required by the County.

Response to Comment 495-67

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-68

Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-69

Please see Master Response 1 – Non-EIR/Administrative Issues. It is noted that the wildlife species mentioned by the commenter are common species, whereas, pursuant to CEQA, the Draft EIR (Chapter 5) focuses on potential project impacts to species with special-status.

Response to Comment 495-70

Please see Response to Comment 495-24.

Response to Comment 495-71

Please see Master Response 6 – Impacts to Local Schools.

Response to Comment 495-72

Please see Response to Comment 495-31.

Response to Comment 495-73
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-74
Impacts related to drainage patterns at the rezone sites were discussed under Discussion Item X-3 of the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR. As discussed therein, with implementation of Mitigation Measure X-1, impacts related to substantially altering the existing drainage pattern of the rezone sites would be less than significant.

Response to Comment 495-75
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 495-76
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-77
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-78
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-79
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment 495-80
Please see Response to Comment 30-3.

Response to Comment 495-81
As discussed on page 3-3 of the Draft EIR, the proposed project, as defined in the Draft EIR, is comprised of 72 properties totaling approximately 235.1 acres. While the Board of Supervisors is considering a smaller number of sites to rezone, this does not necessitate revisions to the Draft EIR analysis, which remains adequate. Thus, it would not be appropriate to "…trim down the EIR to only include the properties that are currently under consideration." Further, the Draft EIR acknowledges that the final list of sites to be rezoned is expected to ultimately contain fewer properties and acreage as the list is refined.

Response to Comment 495-82
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-83
Please see Master Response 3 – County-Owned Sites.

Response to Comment 495-84
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-85
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-86
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety.

Response to Comment 495-87
Please see Response to Comment 495-31.

Response to Comment 495-88
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 495-89
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 4 – Traffic Safety. As discussed in Master Response 1 – Non-EIR/Administrative Issues, while traffic congestion concerns are important to the County, traffic congestion is no longer evaluated pursuant to CEQA. In the case of intersection and roadway level of service, such an analysis is not required pursuant to CEQA Guidelines Section 15064.3(a) because congestion and intersection operations no longer constitute a transportation impact under CEQA. Placer County staff is separately reviewing LOS for the project's consistency with General Plan and community plan LOS policies and this information will be provided in the project staff reports and made available to the public and decision-makers.

Response to Comment 495-90
Please see Master Response 4 – Traffic Safety.

Response to Comment 495-91
Please see Master Response 1 – Non-EIR/Administrative Issues. Air pollution is addressed in Chapter 4 of the Draft EIR and noise is addressed in Chapter 7.

Response to Comment 495-92
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 495-93
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-94
Please see Master Response 3 – County-Owned Sites and Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-95
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-96
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-97
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-98
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment 495-99
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-100
Please see Master Response 1 – Non-EIR/Administrative Issues. It is noted that effects of the surrounding environment on future residences are outside the scope of CEQA.

Response to Comment 495-101
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-102
As discussed under Impacts I-1 and I-2 of the Initial Study prepared for the proposed project, attached as Appendix A of the Draft EIR, established scenic vistas are not located on or adjacent to the potential rezone sites, and officially designated State Scenic Highways are not located within Placer County. See also Response to Comment 11-7.

Response to Comment 495-103
Please see Responses to Comments 52-2, 163-4, and 163-16.

Response to Comment 495-104
Please see Master Response 1 – Non-EIR/Administrative Issues. Only projects with a minimum 20 percent affordable housing (as defined in Government Code Section 65915), could be permitted by-right as defined by Government Code Section 65583.2(i). Future development of the sites would be subject to a Subsequent Conformity Review and Design Review Agreement process, the latter of which requires a public hearing as a discretionary process.

Response to Comment 495-105
The environmental-related comments submitted at the subject meeting are addressed within this Final EIR.

Response to Comment 495-106
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-107
Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 3 – County-Owned Sites.

Response to Comment 495-108
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-109
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-110
Please see Master Response 1 – Non-EIR/Administrative Issues, Response to Comment 30-3, and Response to Comment 495-1.

Response to Comment 495-111
Please see Master Response 5 – Programmatic EIR vs. Site-Specific EIR. It is also noted that any future projects proposed on rezone sites would be subject to a Subsequent Conformity Review and if this review determines a project would result in more severe impacts than identified in the Housing Element Sites Rezone EIR, then a focused CEQA analysis would be required to identify if the impacts could be mitigated or if the project would result in significant, unavoidable impacts.

Response to Comment 495-112
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-113
Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment 495-114
Please see Master Response 2 –Social and Economic Impacts and Master Response 1 – Non-EIR/Administrative Issues.

3. Revisions to the Draft EIR Text

3. REVISIONS TO THE DRAFT EIR TEXT

3.1 INTRODUCTION

The Revisions to the Draft EIR Text chapter presents minor corrections, additions, and revisions made to the Draft EIR initiated by the Lead Agency (Placer County) based on comments received during the public review period by reviewing agencies, the public, and/or consultants.

The changes represent minor clarifications/amplifications of the analysis contained in the Draft EIR and do not constitute significant new information that, in accordance with CEQA Guidelines, Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

3.2 DESCRIPTION OF CHANGES

New text is double underlined and deleted text is ~~struck through~~. Text changes are presented in the page order in which they appear in the Draft EIR.

1 Introduction

Page 1-11 of Chapter 1, Introduction, of the Draft EIR is hereby revised, as follows:

> Three airports are located within Placer County including the Lincoln Regional Airport, the Auburn Municipal Airport, and the Blue Canyon-Nyack Airport. Of all the rezone sites, none are located within the Lincoln Regional Airport or Blue Canyon-Nyack Airport influence areas. However, ~~12~~ 11 of the proposed rezone sites are located entirely within the Auburn Municipal Airport influence area (Sites #35, #36, #42, ~~#43,~~ #51, #56, #57, #61, #65, #66, #70, and #74), and one rezone site (Site #58) is located partially within the Airport influence area. In addition, while the Truckee Tahoe Airport is not located within Placer County, a portion of the Airport's overflight zone is within the County boundaries, and, as a result, one of the proposed rezone sites (Site #44) is located within the Truckee Tahoe Airport influence area. All rezone sites within airport influence areas, with the exception of ~~Site #42 and~~ Site #43, are located in airport land use zones that allow development of multi-family residential development as a compatible use. However, according to the Placer County Airport Land Use Compatibility Plan (PCALUCP), ~~with regard to~~ Site~~s #42 and~~ #43 is split between Compatibility Zone C1 and Zone C2. Zone C1 does not permit multi-family development as a compatible use. As such, the portion of Site #43 that is within Zone C1, approximately one-third of the site, would be required to be developed as a lower density residential use, such as single-family residential or short-term lodging, or as an alternative use, such as parking, open space, or public space.~~,~~ ~~compliance with conditions 1 through 3 of the Placer County Airport Land Use Compatibility Plan (PCALUCP) Policy 4.3.4(b) would be required as conditions of approval to ensure development within Sites #42 and #43 is compatible with the airport land use zone in which the sites are located~~. Therefore, the proposed project would not likely result in a safety hazard for people residing or working in the Auburn Municipal Airport influence area or Truckee Tahoe Airport influence area. Therefore, a *less-than-significant* impact would occur.

The foregoing minor text changes are for clarification purposes and do not affect the adequacy of the environmental analysis contained in the Draft EIR.

3 Project Description

Table 3-2 on Pages 3-17 through 3-19 of Chapter 3, Project Description, of the Draft EIR is hereby revised as follows:

Table 3-2
Proposed Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
1	474-130-001-000	2575 PFE Road	4.3	1	Residence
2	474-130-002-000	Antelope Road	3.7	1	Undeveloped
3	473-010-012-000	8230 Brady Lane	4.4	1	Undeveloped
4	473-010-013-000	8230 Brady Lane	10.3	1	Undeveloped
5	473-010-014-000	8230 Brady Lane	4.5	1	Residence
6	473-010-020-000	8230 Brady Lane	2.7	1	Residence
7	473-020-015-000	Vineyard Road	2.7	1	Undeveloped
8	473-010-001-000	8101 East Drive	6.9	1	Agriculture
9	023-240-077-000	8830 Cook Riolo Road	2.2	1	Residential Accessory Structure
10	023-240-038-000	8830 Cook Riolo Road	2.4	1	Single-Family Residential
11	019-191-020-000	5780 13th Street	0.8	2	Undeveloped
12	019-211-013-000	4881 Riosa Road	1.1	2	Undeveloped
13	043-060-032-000	3066 Penryn Road	2.6	3	Undeveloped
14	032-191-020-000	2221 Taylor Road	0.5	3	Undeveloped
15	032-220-010-000	2084 Sisley Road	0.4[1]	3	Undeveloped
16	032-220-051-000	7365 English Colony Way	4.8	3	Undeveloped
17	043-060-045-000	3130 Penryn Road	4.7	3	Undeveloped
18	043-060-048-000	Hope Way	6.1	3	Undeveloped
19	047-150-012-000	7100 Douglas Boulevard	1.6	4	Undeveloped
20	047-150-042-000	7190 Douglas Boulevard	1.4	4	Undeveloped
21	043-072-018-000	Penryn Road	1.2	4	Undeveloped

Continued on next page.

Table 3-2
Proposed Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
22	043-072-019-000	Penryn Road	1.0	4	Undeveloped
23	046-090-042-000	Cavitt Stallman Road	3.2	4	Undeveloped
24	048-132-071-000	Eureka & Auburn-Folsom	1.8	4	Residence
25	048-132-073-000	8950 Auburn Folsom Road	1.7	4	Multifamily Residential
26	047-150-053-000	8989 Auburn Folsom Road	17.4	4	Undeveloped
27	047-150-015-000	7130-7160 Douglas Boulevard	0.9	4	Commercial
28	047-150-016-000	7130-7160 Douglas Boulevard	0.8	4	Commercial
29	468-060-019-000	3865 Old Auburn Road	4.8	4	Single-Family Residential
30	048-084-033-000	5890 Granite Lake Drive	2.7	4	Undeveloped
31	048-630-023-000	5890 Granite Lake Drive	4.0	4	Undeveloped
34[2]	038-104-095-000	Canal Street	12.8	5	Undeveloped
35	052-071-001-000	Masters Court	2.9	5	Storage
36	052-071-039-000	Willow Creek Drive	0.8	5	Undeveloped
37	053-103-026-000	Bowman Road	1.1	5	Mostly Undeveloped & Parking Lot
38	053-104-004-000 & 053-104-005-000	Channel Hill	2.3	5	Undeveloped
39	054-143-016-000	Dolores Drive	3.9	5	Undeveloped
40	054-143-018-000	13445 Bowman Road	1.0	5	Mostly Undeveloped & Parking Lot
41	054-181-029-000	395 Silver Bend Way	2.0	5	Undeveloped
42	076-420-063-000	Graeagle Lane	3.1	5	Mostly Undeveloped & Parking Lot
43	076-420-064-000	Dry Creek & Highway 49	0.6	5	Undeveloped
44	080-270-067-000	Highway 267	1.0	5	Undeveloped

Continued on next page.

Table 3-2
Proposed Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
45	095-050-042-000	235 Alpine Meadows Road	1.6	5	~~Recreation~~ Workforce Housing
46	054-171-034-000	Silver Bend Way	2.3	5	Parking Lot
47	054-171-027-000	355 Silver Bend Way	3.0	5	Residence
48	054-171-049-000	Silver Bend Way	0.8	5	Undeveloped
49	038-104-094-000	12150 Luther Road	2.2	5	Undeveloped
50	054-171-033-000	180 Silver Bend Way	0.8	5	Undeveloped
51	052-043-009-000	Plaza Way	1.8	5	Undeveloped
52	054-143-019-000	13431 Bowman Road	3.2	5	Lodging
53	053-103-054-000	Mill Pond Road	1.9	5	Undeveloped
54	073-170-053-000	17905 Applegate Road	1.3	5	Undeveloped
55	073-170-055-000	Applegate Road	1.0	5	Undeveloped
56	052-042-015-000	Plaza Way	0.9	5	Undeveloped
57	052-042-016-000	Plaza Way	1.2	5	Undeveloped
58	076-112-094-000	4960 Grass Valley Highway	13.0	5	Undeveloped
59	038-104-085-000	1451 Lowe Lane	1.3	5	Apartments
60	038-113-031-000	1185 Edgewood Road	1.9	5	Undeveloped
61	076-092-008-000	No Address On File	2.2	5	Undeveloped
62	038-121-067-000	Edgewood Road/Blitz Lane	1.3	5	Undeveloped
63	038-104-082-000	1475 Lowe Lane	0.6	5	Single-Family Residential
64	038-121-030-000	11764 Edgewood Road	4.2	5	Single-Family Residential
65	076-070-002-000	4362 Grass Valley Highway	1.8	5	Single-Family Residential

Continued on next page.

Table 3-2
Proposed Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
66	076-070-068-000	4390 Grass Valley Highway	0.8	5	Multi-Family Residential
67	076-112-084-000	4950 Grass Valley Highway	1.1	5	Single-Family Residential
68	080-020-013-000	10715 Highway 89	2.3	5	Mobile Homes
69	080-020-014-000	10715 River Road	1.6	5	Mobile Homes
70	051-120-068-000	3120 Deseret Drive	8.6	5	House of Worship
71	054-290-064-000	Lincoln Way Property 1	2.9	5	Undeveloped
72	054-290-065-000	Lincoln Way Property 2	4.5	5	Undeveloped
73	038-121-068-000	920 Blitz Lane	10.1	5	Single-Family Residential
74	052-171-005-000	Bell Road	15.8	5	Undeveloped
		Total acres	**235.1**	-	-

[1] This site is adjacent to the 4.8-acre site identified by APN 032-220-051-000. If both sites are rezoned, a 5.3-acre area would be available for development.
[2] Sites #32 and #33 have been removed from this list due to Assembly Bill (AB) 52 tribal consultation efforts conducted by Placer County for the proposed project.

The foregoing revisions to the Draft EIR are provided for clarification purposes in response to public comment and do not affect the adequacy of the Draft EIR analysis.

7 Noise

Page 7-28 of Chapter 7, Noise, of the Draft EIR is hereby revised, as follows:

> Three airports are located within Placer County: the Lincoln Regional Airport, the Auburn Municipal Airport, and the Blue Canyon-Nyack Airport. Of the 72 rezone sites, none are located within the Lincoln Regional Airport or Blue Canyon-Nyack Airport influence areas. However, ~~12~~ 11 of the proposed rezone sites are located entirely within the Auburn Municipal Airport influence area (Sites #35, #36, #42, ~~#43,~~ #51, #56, #57, #61, #65, #66, #70, and #74), and one rezone site (Site #58) is located partially within the Auburn Municipal Airport influence area. Site #43 is split between Zone C1 and Zone C2. It should also be noted that while the Truckee Tahoe Airport is not located within Placer County, a portion of the airport's overflight zone is within the County boundaries. As a result, one of the proposed rezone sites (Site #44) is located within the Truckee Tahoe Airport influence area.

Page 7-31 of Chapter 7, Noise, of the Draft EIR is hereby revised, as follows:

> Therefore, exterior noise levels would comply with the Placer County 60 dBA L_{dn} exterior noise standard for rezone sites located closest to local airports. Additionally, it should be noted that the Placer County Airport Land Use Compatibility Plan (PCALUCP) ~~includes~~

requires buyer awareness measures including Recorded Overflight Notifications for projects within ~~overflight zones~~ Compatibility Zones C1 and C2. An overflight notification informs property owners that the property is subject to aircraft overflight and generation of noise. Overflight notifications are generally appropriate in areas outside the 60 dB CNEL noise contour.

The foregoing minor text changes are for clarification purposes and do not affect the adequacy of the environmental analysis contained in the Draft EIR.

10 Fire Protection and Wildfire

Page 10-8 of Chapter 10, Fire Protection and Wildfire, of the Draft EIR is hereby revised, as follows:

The Penryn FPD collects development impact fees on new construction within the district, which goes towards the district's Mitigation Fund, used to purchase capital equipment. Currently, the Penryn FPD's Fire Facilities Fee is $0.96 per square foot of residential development. The fee was last updated in ~~2023~~ 2014.[6]

Page 10-10 of Chapter 10, Fire Protection and Wildfire, of the Draft EIR is hereby revised, as follows:

Automatic and mutual aid agreements between Placer Hills FPD and 12 other fire protection agencies in western Placer County, including Alta FPD, South Placer FPD, Newcastle FPD, Penryn FPD, CAL FIRE, and the cities of Lincoln, Rocklin, and Roseville, are in place to provide an increased level of protection and to ensure the most efficient service to the communities. ~~Placer Hills PFD also has a formal automatic aid agreement with the Peardale Chicago Park FPD in Nevada County.[13]~~ In addition, the Placer Hills FPD has an Administrative Agreement with the Newcastle FPD and the Penryn FPD wherein the FPD's all operate under the same administration and share one chief officer. Although the Placer Hills FPD does not have an adopted response time standard for emergency calls, current response times in the Placer Hills FPD are between seven and ten minutes, which is better than the State average of 12 minutes.

Page 10-10 of Chapter 10, Fire Protection and Wildfire, of the Draft EIR is hereby further revised, as follows:

The Placer Hills FPD collects development impact fees specific to fire services for the area within the Placer Hill FPD, which was last updated in ~~2008~~ 2020. The fee was established to fund facility upgrades and new facilities that would be needed to serve new development. The Placer Hills FPD's facilities impact fees are $0.98 per square foot of residential development.

Page 10-38 of Chapter 10, Fire Protection and Wildfire, of the Draft EIR is hereby revised, as follows:

While a new ladder truck within the FPDs' service area would be needed to meet the response time targets (NFPA Standard 1710), this would not constitute a CEQA impact unless a new or expanded fire station facility would be needed to house the ladder truck, as such new construction or alteration could result in physical impacts to the environment. According to Chief D'Ambrogi, the Newcastle FPD station, which is a new station completed last year located at ~~9211 Cypress Street~~ 9350 Old State Highway, Newcastle,

CA 95658, was designed to accommodate a ladder truck and can do so efficiently.[33] If this were to be done, the response times would be in the range of 5-7 minutes, using Taylor Road or I-80 to the Penryn/Loomis areas.[34] Thus, the reasonably foreseeable residential development that could potentially result from the proposed project within the Penryn FPD and Placer Hills FPD jurisdictions would not require a new fire station or alteration of an existing fire station to house a new ladder truck, should the Newcastle FPD obtain sufficient funding to purchase said truck.

The foregoing minor text changes are for clarification purposes and do not affect the adequacy of the environmental analysis contained in the Draft EIR.

12 Alternatives Analysis

Table 12-1 on pages 12-9 and 12-10 of Chapter 12, Alternatives Analysis, of the Draft EIR is hereby revised, as follows:

Table 12-1
Reduced Sites (Willing Property Owners Only) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
3	473-010-012-000	8230 Brady Lane	4.4	1	Undeveloped
4	473-010-013-000	8230 Brady Lane	10.3	1	Undeveloped
5	473-010-014-000	8230 Brady Lane	4.5	1	Residence
7	473-020-015-000	Vineyard Road	2.7	1	Undeveloped
8	473-010-001-000	8101 East Drive	6.9	1	Agriculture
9	023-240-077-000	8830 Cook Riolo Road	2.2	1	Residential Accessory Structure
10	023-240-038-000	8830 Cook Riolo Road	2.4	1	Single-Family Residential
11	019-191-020-000	5780 13th Street	0.8	2	Undeveloped
12	019-211-013-000	4881 Riosa Road	1.1	2	Undeveloped
13	043-060-032-000	3066 Penryn Road	2.6	3	Undeveloped
14	032-191-020-000	2221 Taylor Road	0.5	3	Undeveloped
16	032-220-051-000	7365 English Colony Way	4.8	3	Undeveloped
17	043-060-045-000	3130 Penryn Road	4.7	3	Undeveloped
18	043-060-048-000	Hope Way	6.1	3	Undeveloped
23	046-090-042-000	Cavitt Stallman Road	3.2	4	Undeveloped

Continued on next page.

Table 12-1
Reduced Sites (Willing Property Owners Only) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
24	048-132-071-000	Eureka & Auburn-Folsom	1.8	4	Residence
25	048-132-073-000	8950 Auburn Folsom Road	1.7	4	Multifamily Residential
26	047-150-053-000	8989 Auburn Folsom Road	17.4	4	Undeveloped
29	468-060-019-000	3865 Old Auburn Road	4.8	4	Single-Family Residential
30	048-084-033-000	5890 Granite Lake Drive	2.7	4	Undeveloped
34	038-104-095-000	Canal Street	12.8	5	Undeveloped
35	052-071-001-000	Masters Court	2.9	5	Storage
42	076-420-063-000	Graeagle Lane	3.1	5	Mostly Undeveloped & Parking Lot
43	076-420-064-000	Bowman Road	0.6	5	Undeveloped
45	095-050-042-000	235 Alpine Meadows Road	1.6	5	~~Recreation~~ Workforce Housing
47	054-171-027-000	355 Silver Bend Way	3.0	5	Residence
48	054-171-049-000	Silver Bend Way	0.8	5	Undeveloped
49	038-104-094-000	12150 Luther Road	2.2	5	Undeveloped
50	054-171-033-000	180 Silver Bend Way	0.8	5	Undeveloped
51	052-043-009-000	Plaza Way	1.8	5	Undeveloped
53	053-103-054-000	Mill Pond Road	1.9	5	Undeveloped
56	052-042-015-000	Plaza Way	0.9	5	Undeveloped
58	076-112-094-000	4960 Grass Valley Highway	13.0	5	Undeveloped
59	038-104-085-000	1451 Lowe Lane	1.3	5	Apartments
60	038-113-031-000	1185 Edgewood Road	1.9	5	Undeveloped
61	076-092-008-000	No Address On File	2.2	5	Undeveloped
62	038-121-067-000	Edgewood Road/Blitz Lane	1.3	5	Undeveloped

Continued on next page.



Table 12-1
Reduced Sites (Willing Property Owners Only) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
63	038-104-082-000	1475 Lowe Lane	0.6	5	Single-Family Residential
64	038-121-030-000	11764 Edgewood Road	4.2	5	Single-Family Residential
68	080-020-013-000	10715 Highway 89	2.3	5	Mobile Homes
69	080-020-014-000	10715 River Road	1.6	5	Mobile Homes
71	054-290-064-000	Lincoln Way Property 1	2.9	5	Undeveloped
72	054-290-065-000	Lincoln Way Property 2	4.5	5	Undeveloped
73	038-121-068-000	920 Blitz Lane	10.1	5	Single-Family Residential
74	052-171-005-000	Bell Road	15.8	5	Undeveloped
		Total acres	**179.7**	-	-

Table 12-2 on pages 12-14 of Chapter 12, Alternative Analysis, of the Draft EIR is hereby revised, as follows:

Table 12-2
Reduced Sites (Smaller Unit Buffer) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
7	473-020-015-000	Vineyard Road	2.7	1	Undeveloped
8	473-010-001-000	8101 East Drive	6.9	1	Agriculture
9	023-240-077-000	8830 Cook Riolo Road	2.2	1	Residential Accessory Structure
10	023-240-038-000	8830 Cook Riolo Road	2.4	1	Single-Family Residential
11	019-191-020-000	5780 13th Street	0.8	2	Undeveloped
17	043-060-045-000	3130 Penryn Road	4.7	3	Undeveloped
18	043-060-048-000	Hope Way	6.1	3	Undeveloped

Continued on next page.

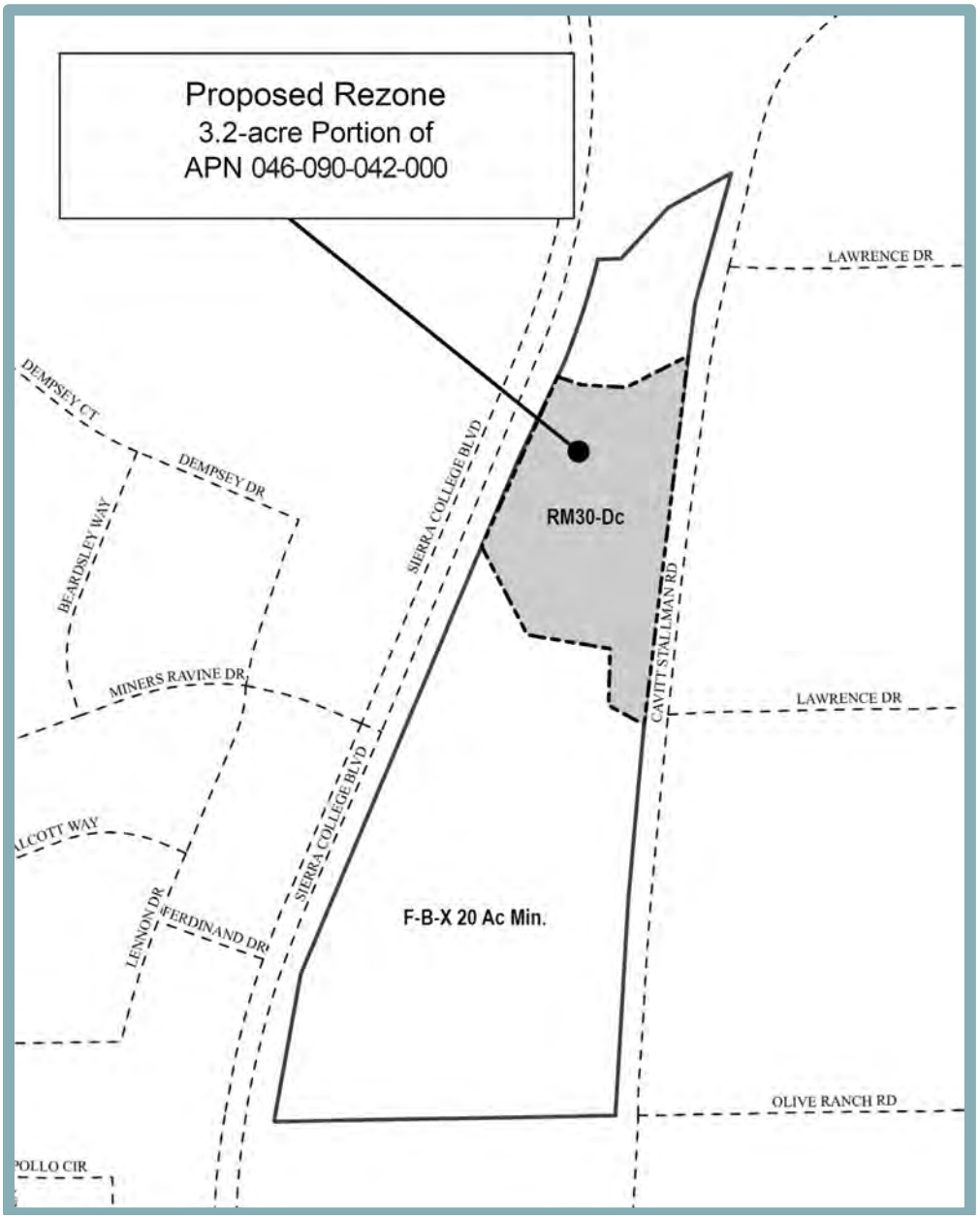
Table 12-2
Reduced Sites (Smaller Unit Buffer) Alternative Rezone Sites

Property Map Number	APN	Location	Acreage (Gross)	Supervisorial District	Existing Conditions
25	048-132-073-000	8950 Auburn Folsom Road	1.7	4	Multifamily Residential
26	047-150-053-000	8989 Auburn Folsom Road	17.4	4	Undeveloped
29	468-060-019-000	3865 Old Auburn Road	4.8	4	Single-Family Residential
34	038-104-095-000	Canal Street	12.8	5	Undeveloped
35	052-071-001-000	Masters Court	2.9	5	Storage
42	076-420-063-000	Graeagle Lane	3.1	5	Mostly Undeveloped & Parking Lot
43	076-420-064-000	Bowman Road	0.6	5	Undeveloped
45	095-050-042-000	235 Alpine Meadows Road	1.6	5	~~Recreation~~ Workforce Housing
47	054-171-027-000	355 Silver Bend Way	3.0	5	Residence
51	052-043-009-000	Plaza Way	1.8	5	Undeveloped
53	053-103-054-000	Mill Pond Road	1.9	5	Undeveloped
68	080-020-013-000	10715 Highway 89	2.3	5	Mobile Homes
69	080-020-014-000	10715 River Road	1.6	5	Mobile Homes
		Total acres	**81.3**	-	-

The foregoing revisions to the Draft EIR are provided for clarification purposes in response to public comment and do not affect the adequacy of the Draft EIR analysis.

Appendix C

Appendix C, Site Inventory Forms, of the Draft EIR is hereby revised to include the following figure:



The foregoing revision to the Draft EIR is provided for clarification purposes in response to public comment and does not affect the adequacy of the Draft EIR analysis.

4. Mitigation Monitoring and Reporting Program

4. MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

Section 15097 of the California Environmental Quality Act (CEQA) requires all State and local agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a "mitigated negative declaration" or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the Housing Element Site Rezone Project (proposed project). The intent of the MMRP is to ensure implementation of the mitigation measures identified within the EIR for the proposed project. Unless otherwise noted, the cost of implementing the mitigation measures as prescribed by this MMRP shall be funded by the applicant.

4.2 COMPLIANCE CHECKLIST

The MMRP contained herein is intended to satisfy the requirements of CEQA as they relate to the EIR prepared for the proposed project. This MMRP is intended to be used by Placer County staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMRP were developed in the EIR.

The EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by CEQA Guidelines, Section 15370, as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The intent of the MMRP is to ensure the implementation of adopted mitigation measures. The MMRP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by Placer County. The table attached to this report identifies the mitigation measures, the monitoring action for each mitigation measure, the responsible party for the monitoring action, and timing of the monitoring action. The applicant will be responsible for fully understanding and effectively

implementing the mitigation measures contained within the MMRP. The County will be responsible for monitoring compliance.

4.3 MITIGATION MONITORING AND REPORTING PROGRAM

The following table includes the mitigation measure number, the impact the measure is designed to address, the measure text, the monitoring agency, implementation schedule, and an area for sign-off indicating compliance.

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
4. Air Quality and Greenhouse Gas Emissions					
4-1	Conflict with or obstruct implementation of the applicable air quality plan during project construction.	*4-1* *Prior to the approval of improvement plans for any future site-specific development plans, designs, or proposals that would result in more than 35 acres of ground disturbance and/or would include any of the following, the project applicant shall retain a qualified air quality consultant to conduct an analysis to quantify the project's construction emissions and compare the emissions to the applicable PCAPCD thresholds of significance:* • *Construction of buildings more than four stories tall;* • *Demolition activities;* • *Major trenching activities;* • *A construction schedule that is unusually compact, fast-paced, or involves more than two phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;* • *Cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills); or* • *Require import or export of soil materials that would require a considerable amount of haul truck activity.*	Placer County Community Development Resource Agency PCAPCD	Prior to approval of improvement plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Quantified emissions and identified reduction measures shall be submitted to the Placer County Community Development Resource Agency for review and approval. *If emissions are determined to be below the applicable PCAPCD thresholds of significance, further mitigation is not required.* *If emissions are determined to exceed the applicable thresholds of significance, the qualified air quality consultant shall identify measures sufficient to reduce the project's construction emissions to below the PCAPCD's thresholds of significance. Emission reduction measures may include, but are not limited to, use of heavy-duty off-road vehicles (50 horsepower or more) with late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.* *If on-site emissions reduction measures are not sufficient to achieve a fleet-wide average reduction in construction-related emissions to below the applicable PCAPCD thresholds of significance, the project applicant shall pay a mitigation fee based on the equivalent amount of the*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			project's contribution of criteria pollutant emissions that exceeds the applicable threshold of significance, as well as the per ton cost-effectiveness identified by the CARB's most current Carl Moyer Program Guidance. The final details of the mitigation fee shall be determined in coordination with, and reviewed and approved by, the PCAPCD and Placer County Community Development Resource Agency. Proof of payment shall be submitted to the Placer County Community Development Resource Agency.			
4-2	Conflict with or obstruct implementation of the applicable air quality plan during project operation.	*4-2(a)*	*Prior to the approval of any improvement plans, the project applicant shall implement all mitigation measures as determined feasible for mobile and area source emissions identified in the Placer County Air Pollution Control District's (PCAPCD) CEQA Air Quality Handbook, the Placer County Sustainability Plan: A Greenhouse Gas Emission Reduction Plan and Adaptation Strategy (PCSP), the California Green Building Standards Code, Actions A4.203.1.2.1 and A5.203.1.2.1 of the CalGreen standards, and/or other just as effective options as they become available. These measures may include, but are not necessarily limited to, the following:* • *Energy Star®-certified appliances and fixtures shall be installed in all*	Placer County Community Development Resource Agency PCAPCD	Prior to approval of improvement plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		buildings. Types of Energy Star®-certified appliances include boilers, ceiling fans, central and room air conditioners, clothes washers, compact fluorescent light bulbs, computer monitors, copiers, consumer electronics, dehumidifiers, dishwashers, external power adapters, furnaces, geothermal heat pumps, programmable thermostats, refrigerators and freezers, residential light fixtures, room air cleaners, transformers, televisions, vending machines, ventilating fans, and windows. (PCSP, Strategy E-1). • *Implement CALGreen standards by employing energy efficient design features and/or solar photovoltaics and accelerate ZNE (zero net energy). (PCSP, Strategy E-4).* • *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 two to 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. (PCSP, Strategy T-1).*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		• *Streets shall be designed to maximize pedestrian access including the construction of Class I, II, or III bicycle lanes. (PCAPCD CEQA Handbook/CalGreen).* • *Multiple electrical receptacles shall be included on the exterior of all non-residential buildings and accessible for purposes of charging or powering electric landscaping equipment and providing an alternative to using fossil fuel-powered generators. The electrical receptacles shall have an electric potential of 100 volts. There should be a minimum of one electrical receptacle on each side of the building and one receptacle every 100 linear feet around the perimeter of the building (PCAPCD CEQA Handbook/CalGreen).* *Proof of compliance shall be submitted to the PCAPCD and the Placer County Community Development Resource Agency.*			
		4-2(b) *Only natural gas/liquefied petroleum gas (LPG) fireplaces or stoves shall be permitted within multifamily development sites. Devices such as wood-burning fireplaces or stoves, and conventional open-hearth fireplaces are not permitted. Wording relating to this restriction shall be*	Placer County Community Development Resource Agency	Prior to approval of any construction permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			included within the project's CC&R's. Proof of compliance shall be submitted to the Placer County Community Development Resource Agency prior to approval of any permits authorizing construction on a rezone site.			
4-3	Expose sensitive receptors to substantial pollutant concentrations.	*4-3*	*Prior to the approval of improvement plans for any future development on Sites #34 through #36, #42, #43, #49, #51, #56 through #67, and #70 through #73, a qualified geologist or geotechnical engineer shall be retained to conduct additional geologic evaluations of the site to determine the presence or absence of naturally-occurring asbestos. The geologic evaluations shall include the rezone site and any off-site improvement areas where infrastructure construction or installation would occur. In the event that naturally-occurring asbestos is located on-site or on any off-site improvement areas where infrastructure construction or installation would occur, an Asbestos Dust Mitigation Plan shall be prepared and submitted to the PCAPCD and the Placer County Community Development Resource Agency for review and approval. The Asbestos Dust Mitigation Plan shall comply with the PCAPCD's "Asbestos Dust Mitigation Plan Guidance" document, which provides performance standards for ensuring that adverse impacts do not result from asbestos dust during construction. The plan shall*	Placer County Community Development Resource Agency PCAPCD	Prior to approval of improvement plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			address compliance with PCAPCD Rule 228, Fugitive Dust, and the CARB's Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations.			
4-4	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	*4-4*	*Implement Mitigation Measures 4-2(a) and 4-2(b).*	See Mitigation Measures 4-2(a) and 4-2(b)	See Mitigation Measures 4-2(a) and 4-2(b)	
4.5	Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.	*4-5(a)* *4-5(b)*	*Future development on all rezone sites shall implement Mitigation Measure 4-1, if determined applicable by the County, and Mitigation Measures 4-2(a), and 4-2(b).* *Prior to improvement plan approval for any future development proposals with more than 115 multi-family units, the project applicant shall retain a qualified air quality consultant to conduct an analysis to quantify the project's operational GHG emissions and compare the emissions to the applicable PCAPCD thresholds of significance. If emissions are determined to be below the applicable PCAPCD thresholds of significance, further*	See Mitigation Measures 4-1, 4-2(a), and 4-6(b) Placer County Community Development Resource Agency PCAPCD	See Mitigation Measures 4-1, 4-2(a), and 4-6(b) Prior to approval of improvement plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		mitigation is not required. *If emissions are determined to exceed the applicable thresholds of significance, the qualified air quality consultant shall identify measures to reduce the project's operational GHG emissions to below the PCAPCD's recommended thresholds of significance. Emission reduction measures may include, but are not limited to, implementation of applicable PCSP measures, such as Strategy E-1, Strategy E-4, and Strategy T-1, as follows, as well as implementation of a transportation demand management plan, and/or exclusion of natural gas appliances or natural gas plumbing in the building design:* • ***Strategy E-1:*** *Facilitate a transition to electricity as the primary energy source for residential, mixed-use, commercial, and office buildings.* • ***Strategy E-4:*** *Encourage new residential, office, and commercial development, as mitigation for discretionary projects exceeding applicable CEQA GHG thresholds, to implement CALGreen Tier 1 standards and accelerate zero net energy (ZNE) in new construction.* • ***Strategy T-1:*** *Facilitate the installation of public electric vehicle (EV) charging stations at existing*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		and new residential and non-residential uses. *If it is determined that on-site mitigation options are not sufficient to achieve the required GHG reduction, subject to the discretion of PCAPCD and the Placer County Community Development Resource Agency, off-site carbon credits may be purchased to make up the difference. The purchase of off-site mitigation credits shall be negotiated with the County and PCAPCD at the time that credits are sought. Off-site mitigation credits shall be real, quantifiable, permanent, verifiable, enforceable, and additional, consistent with the standards set forth in Health and Safety Code section 38562, subdivisions (d)(1) and (d)(2). The offsets shall be retired, and emissions must be offset through the year 2045. Such credits shall be based on CARB-approved protocols that are consistent with the criteria set forth in subdivision (a) of Section 95972 of Title 17 of the California Code of Regulations, and shall not allow the use of offset projects originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by Placer County and/or the PCAPCD. Such credits must be purchased through one of the following: (i) a CARB-approved*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) any registry established by PCAPCD. *Quantified emissions and identified reduction measures shall be submitted to PCAPCD and the Placer County Community Development Resource Agency for review and approval.*			
5. Biological Resources						
5-1	Have a substantial adverse effect, either directly (e.g., cause a plant population to drop below self-sustaining levels, threaten to eliminate a plant community) or through substantial habitat modifications, on special-status plants.	*5-1(a)*	*Prior to County approval of any permit authorizing construction on a rezone site, a field survey shall be conducted by a qualified biologist. Where aquatic resources are observed, an aquatic resources delineation shall be conducted in accordance with U.S. Army Corps of Engineers (USACE) guidance. For a site that is entirely comprised of buildings and pavement, the field survey may consist of a drive-by survey to confirm that the urban condition is still present and to determine if any trees that could be used for nesting by birds are present. Documentation shall be submitted to the Placer County Community Development Resource Agency that details the vegetation communities and aquatic resources identified during the field survey, and lists the special-status species that have*	Placer County Community Development Resource Agency	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		potential to occur on-site. For rezone sites within the Placer County Conservation Program (PCCP) plan area, the documentation shall consist of completion of the PCCP application form and required attachments, as required in Section 6.2.2 of the Biological Resources Assessment (BRA) prepared for the Housing Element Sites Rezone Project (proposed project).			
		Special-Status Plants *5-1(b) If a rezone site has the potential to support special-status plants (as confirmed by the field survey conducted through compliance with Mitigation Measure 5-1[a]), special-status plant surveys shall be conducted by a qualified biologist prior to commencement of construction, and shall be conducted in accordance with agency-accepted protocols at the time of the survey. Currently, the agency-accepted protocols include the Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants; the Botanical Survey Guidelines of the California Native Plant Society; and Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. The foregoing protocols include conducting surveys at the*	Placer County Community Development Resource Agency	Prior to commencement of construction or grading	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		appropriate time of year, when plants are in bloom. *If special-status plant species are not found, further mitigation shall not be required. If special-status plants are found within proposed impact areas and they are perennials, such as Sanford's arrowhead or big-scale balsamroot, then mitigation shall consist of digging up the plants and transplanting them into a suitable conservation area, prior to construction. If the plant found is an annual, such as dwarf downingia, then mitigation shall consist of collecting seed-bearing soil and spreading the soil into a suitable constructed wetland at a mitigation site. If special-status plants will be impacted, a qualified biologist shall prepare an Avoidance and Mitigation Plan detailing protection and avoidance measures, transplantation procedures, success criteria, and long-term monitoring protocols. The Avoidance and Mitigation Plan shall be submitted for review and approval to the Placer County Community Development Resource Agency and shall ensure that mitigation for impacts to rare plants will result in no net loss of individual plants after a five-year monitoring period. In addition, a preconstruction worker awareness training shall be conducted to alert workers to the presence of and protections for special-status plants.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
5-2	Have a substantial adverse effect, either directly (e.g., cause a wildlife population to drop below self-sustaining levels, threaten to eliminate an animal community) or through substantial habitat modifications, on special-status wildlife.	*5-2(a)*	*Implement Mitigation Measure 5-1(a).*	See Mitigation Measure 5-1(a)	See Mitigation Measure 5-1(a)	
		5-2(b)	*If any mitigation measures apart from Mitigation Measure 5-1(a) are required as part of development of a rezone site, the provisions of this mitigation measure shall be required. Prior to any ground-disturbing or vegetation-removal activities, a Worker Environmental Awareness Training (WEAT) shall be prepared and administered to the construction crews. The WEAT shall include the following: discussion of the State and federal Endangered Species Act, the Clean Water Act, the project's permits and California Environmental Quality Act (CEQA) documentation, and associated mitigation measures; consequences and penalties for violation or noncompliance with the foregoing laws and regulations; identification of special-status wildlife, location of any avoided waters of the U.S; hazardous substance spill prevention and containment measures; and the contact person in the event of the discovery of a special-status wildlife species. The WEAT shall also discuss the different habitats used by the species' different life stages and the annual timing of the life stages. A handout summarizing the WEAT information shall be provided to workers to keep on-site for future reference. Upon completion of the*	Placer County Community Development Resource Agency	Prior to any ground-disturbing or vegetation-removal activities	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		WEAT training, workers shall sign a form stating that they attended the training, understand the information presented and will comply with the regulations discussed. Workers shall be shown designated "avoidance areas" during the WEAT training; worker access shall be restricted to outside of those areas to minimize the potential for inadvertent environmental impacts. Fencing and signage around the boundary of avoidance areas may be helpful. Documentation of all construction crews' participation shall be submitted for review and approval to the Placer County Community Development Resource Agency. *Special-Status Bumble Bees* Special-status bumble bees are not covered under the PCCP; thus, the following mitigation measures apply to both the PCCP and non-PCCP rezone sites. *5-2(c) If feasible, initial ground-disturbing activities associated with development of a rezone site (e.g., grading, vegetation removal, staging) shall take place between September 1 and March 31 (i.e., outside the colony active period) to avoid potential impacts on special-status bumble bees. If completing all initial ground-disturbing activities between September 1 and March 31 is not feasible, then at a maximum of 14 days*	Placer County Community Development Resource Agency CDFW	If Initial ground-disturbing activities shall take place between April 1 and August 31, then a maximum of 14 days prior to commencement of construction	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		prior to the commencement of construction activities, a qualified biologist with 10 or more years of experience conducting biological resource surveys within California shall conduct a preconstruction survey for special-status bumble bees in the area(s) proposed for impact. *The survey shall occur during the period from one hour after sunrise to two hours before sunset, with temperatures between 65 degrees Fahrenheit and 90 degrees Fahrenheit, with low wind and zero rain. If the timing of the start of construction makes the survey infeasible due to the temperature requirements, the surveying biologist shall select the most appropriate days based on the National Weather Service seven-day forecast and shall survey at a time of day that is closest to the temperature range stated above. The survey duration shall be commensurate with the extent of suitable floral resources (which represent foraging habitat) present within the area proposed for impact, and the level of effort shall be based on the metric of a minimum of one person-hour of searching per three acres of suitable floral resources/foraging habitat. A meandering pedestrian survey shall be conducted throughout the area proposed for impact in order to identify patches of suitable floral resources.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Suitable floral resources for Crotch's bumble bee include species in the following families: Apocynaceae, Asteraceae, Boraginaceae, Fabaceae, and Lamiaceae. Suitable floral resources for western bumble bee include species in the following families: Asteraceae, Fabaceae, Rhamnaceae, and Rosaceae, as well as plants in the genera Eriogonum and Penstemon. *At a minimum, preconstruction survey methods shall include the following:* • *Search areas with floral resources for foraging bumble bees. Observed foraging activity may indicate a nest is nearby, and therefore, the survey duration shall be increased when foraging bumble bees are present;* • *If special-status bumble bees are observed, watch any special-status bumble bees present and observe their flight patterns. Attempt to track their movements between foraging areas and the nest;* • *Visually look for nest entrances. Observe burrows, any other underground cavities, logs, or other possible nesting habitat;* • *If floral resources or other vegetation preclude observance of the nest, small areas of vegetation*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		may be removed via hand removal, line trimming, or mowing to a height of a minimum of four inches to assist with locating the nest; • *Look for concentrated special-status bumble bee activity;* • *Listen for the humming of a nest colony; and* • *If bumble bees are observed, attempt to photograph the individual and identify it to species.* *The biologist conducting the survey shall record when the survey was conducted, a general description of any suitable foraging habitat/floral resources present, a description of observed bumble bee activity, a list of bumble bee species observed, a description of any vegetation removed to facilitate the survey, and their determination of if survey observations suggest a special-status bumble bee nest(s) may be present or if construction activities could result in take of special-status bumble bees. The report shall be submitted to the Placer County Community Development Resource Agency prior to the commencement of construction activities.* *If bumble bees are not located during the preconstruction survey or the bumble bees located are definitively identified as a common species (i.e., not special-status*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		species), then further mitigation or coordination with the California Department of Fish and Wildlife (CDFW) is not required. *If any sign(s) of a bumble bee nest is observed, and if the species present cannot be established as a common bumble bee, then construction shall not commence until either (1) the bumble bees present are positively identified as common (i.e., not a special-status species), or (2) the completion of coordination with CDFW to identify appropriate mitigation measures, which may include, but not be limited to, waiting until the colony active season ends, establishment of nest buffers, or obtaining an Incidental Take Permit (ITP) from CDFW.* *If special-status bees are located, and after coordination with CDFW take of special-status bumble bees cannot be avoided, the project applicant shall obtain an ITP from CDFW, and the applicant shall implement all conditions identified in the ITP. Mitigation required by the ITP may include, but not be limited to, the project applicant translocating nesting substrate in accordance with the latest scientific research to another suitable location (i.e., a location that supports similar or better floral resources as the*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		impact area), enhancing floral resources on areas of the rezone site that will remain appropriate habitat, worker awareness training, and/or other measures specified by CDFW. *Special-Status Branchiopods* <u>Placer County Conservation Program Sites</u> *5-2(d) If a rezone site is covered under the Placer County Conservation Program (PCCP) and supports vernal pools, then PCCP Species Condition 10 shall be implemented, as follows:* *<u>PCCP Species Condition 10</u>: Wet-season surveys to determine occupancy of vernal pools by vernal pool fairy shrimp and vernal pool tadpole shrimp shall be required if the proposed project is implemented while the PCCP is still in the Initial Survey Phase. The Placer Conservation Authority (PCA) shall inform the applicant if the PCCP is in the Initial Survey Phase and surveys are required. If required, wet season surveys shall be conducted for vernal pool fairy shrimp and vernal pool tadpole shrimp in vernal pools, as determined by wetland delineation. A qualified biologist shall conduct protocol-level wet season surveys, using modified Survey Guidelines for the Listed Large Branchiopods (Guidelines), as approved by the U.S. Fish and Wildlife Service*	Placer County Community Development Resource Agency Placer Conservation Authority	Prior to commencement of construction or grading, if the proposed project is implemented while the PCCP is in the Initial Survey Phase	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		(USFWS). Modifications include requiring that all vernal pools at a site be surveyed, rather than allowing for the survey to be terminated when presence on a project site is confirmed. This modification is necessary to obtain data on presence and absence in all the available vernal pools, to facilitate the determination of the Occupancy Rate Standards. This, and other exceptions and additions to the Guidelines, are as follows: • *If presence is confirmed for vernal pool fairy shrimp and/or vernal pool tadpole shrimp in an individual vernal pool, surveys may be stopped for that vernal pool.* • *All vernal pools on the project site must be surveyed. Surveys cannot be suspended prior to completion, as allowed by the Guidelines, if one or more of the six listed large branchiopods, identified in the Guidelines is determined to be present.* • *The Guidelines define a complete survey as consisting of one wet-season and one dry-season survey conducted and completed in accordance with the Guidelines within a three-year period. For the purposes of the PCCP, only one wet-season survey is required; dry-season surveys are not required.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Applicants must plan ahead to allow sufficient time to complete the surveys. • *Data that will be collected at each vernal pool surveyed during the wet-season survey shall include the presence or absence of vernal pool fairy shrimp and vernal pool tadpole shrimp, species identity and the estimated abundance (10s, 100s, 1,000s) of immature and mature vernal pool fairy shrimp and vernal pool tadpole shrimp present and estimated maximum surface area of the vernal pool. Other information on the USFWS data sheet is not required to be collected (i.e., air and water temperature, average and estimated maximum depth of the vernal pool, presence of non-target crustaceans, insects, and platyhelminths, and habitat condition). This will allow surveys to be conducted more efficiently, while providing the essential information necessary to calculate the Pool-based Occupancy Rate Standard and the Area-based Occupancy Rate Standard. Because the vernal pools will be affected by Covered Activities, collection of additional information is not necessary.* • *Information shall be recorded on the PCA-provided data sheet,*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		which will be the USFWS data sheet (included as Appendix A to the Guidelines), modified to include the above information. • *Voucher specimens shall not be collected during wet season surveys unless the identity of the mature shrimp is uncertain and cannot be identified in the field. The Guidelines allow for a limited number of voucher specimens to be collected for each vernal pool. For the purpose of the PCCP, the modified survey protocol further limits the collection of voucher specimens to instances where identity is uncertain.* *The biologist conducting a survey for vernal pool fairy shrimp and vernal pool tadpole shrimp shall participate in the wetland delineation to map the area of each vernal pool. If the biologist cannot participate in the wetland delineation, and the wetland delineation does not provide area for each vernal pool, the biologist shall conduct follow-up surveys to map the perimeter of each vernal pool with a global positioning system (GPS). Each vernal pool shall be given a unique identification number that will be used to track survey data collected during wet-season surveys.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		5-2(e) Implement Mitigation Measures 5-4(e), 5-4(f), 5-4(g), and 5-4(h).	See Mitigation Measures 5-4(e), 5-4(f), 5-4(g), and 5-4(h)	See Mitigation Measures 5-4€, 5-4(f), 5-4(g), and 5-4(h)	
		<u>Sites Not Covered under the Placer County Conservation Program</u> *5-2(f) If a rezone site is not covered under the PCCP and will impact vernal pools, seasonal wetlands, and/or seasonal wetland swales, the provisions of this mitigation measure are required. If protocol-level branchiopod surveys are not conducted or if federally listed vernal pool branchiopods are found during protocol-level wet- and dry-season surveys of the site, then prior to County approval of any permit authorizing construction, the project applicant shall consult with the USFWS regarding impacts to federally listed vernal pool branchiopods from the proposed project. If federally listed vernal pool branchiopods are not found during the wet- and dry-season surveys, further mitigation shall not be required. If federally listed vernal pool branchiopods are found, the project applicant shall obtain and comply with any conditions of the appropriate take authorization from the USFWS, prior to County approval of any permit authorizing construction. The conditions in the take authorization may include, but not be limited to, fencing off avoided habitat;*	Placer County Community Development Resource Agency USFWS	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		worker awareness trainings; preservation, restoration, or enhancement of habitat on- or off-site to compensate for indirect and/or direct effects; purchase of habitat credits from an agency-approved mitigation/conservation bank; working with a local land trust to preserve land; or any other method acceptable to USFWS. A copy of the take authorization shall be submitted to the Placer County Community Development Resource Agency. *Monarch Butterfly* Monarch butterfly is not covered under the PCCP; thus, the following mitigation measures apply to both the PCCP and non-PCCP rezone sites. *5-2(g) If potential habitat for monarch butterfly is present within the rezone site, then the provisions of this mitigation measure are required. If construction occurs during the time when milkweed plants may host monarch eggs or caterpillars (approximately mid-March through late September) and construction activity would require the removal of milkweed plants, then, at most, 14 days prior to plant removal, the plants shall be surveyed by a qualified biologist for the presence of eggs, larvae (i.e., caterpillars), or pupae. The survey results shall be submitted for review and approval to the Placer County Community Development Resource*	Placer County Community Development Resource Agency	If ground-disturbing activities shall take place between approximately mid-March to late September, then 14 days prior to plant removal	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Agency. If eggs, caterpillars, or pupae are not detected, additional protection measures are not necessary. If eggs, caterpillars, or pupae are found, the plants shall be avoided until metamorphosis is completed and adult butterflies emerge and leave the host plant. *VELB* <u>Placer County Conservation Program Sites</u> *5-2(h) If a Western Rezone Site is covered under the PCCP and occurs in riparian, valley oak woodland, or stream system below 650 feet above mean sea level (amsl) in elevation, then PCCP Species Condition 8 shall be implemented, as follows:* *<u>PCCP Species Condition 8</u>: Planning surveys for valley elderberry longhorn beetle are required for Covered Activities within the following habitat features when below 650 feet (above mean sea level):* *1. Riparian constituent habitat.* *2. Valley oak woodland community.* *3. Stream System (excluding frequently disked or flooded agricultural lands such as rice that would not likely support elderberry shrubs).* *The project applicant will apply avoidance and minimization measures as specified in*	Placer County Community Development Resource Agency Placer Conservation Authority	Prior to commencement of construction or grading of a Western Rezone Site that occurs in riparian, valley oak woodland, or stream system below 650 feet above mean seal level (asml) in elevation	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		the USFWS's Conservation Guidelines for the Valley Elderberry Longhorn Beetle (U.S. Fish and Wildlife Service 1999b) or the current Wildlife Agency–approved avoidance and minimization protocol. When take is authorized the project applicant must coordinate with the PCA to provide transplants and seedlings/cuttings for planting in suitable habitat on the Reserve System consistent with the USFWS Guidelines/Framework. Project-by-project mitigation requirements for valley elderberry longhorn beetle cannot be applied to the restoration requirements of 6.3.2.2.3 (Community Condition 2.3, Riverine and Riparian Restoration) for a project's associated riparian native trees/shrubs impacts to be planted as replacement habitat (i.e., mitigation for impacts to valley elderberry longhorn beetle [transplants and plantings of seedlings/cuttings] does not count as mitigation for impacts to riverine and riparian [restoration of riverine and riparian]). The distinction between valley elderberry longhorn beetle impacts and riverine/riparian impacts will be addressed through project-specific mitigation requirements that provide for restoration of natural communities, including riverine/riparian complex (i.e., restoration dependent on effects; see Table 5-4 of the PCCP).			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		<u>Sites Not Covered under the Placer County Conservation Program</u> *5-2(i)* *If an elderberry shrub(s) is found within a Western Rezone Site not covered under the PCCP, VELB surveys shall be conducted in areas proposed for impact, at most, three years prior to commencement of construction. Surveys may be conducted at any time of year, but elderberry shrubs tend to be the most visible in spring. Surveys shall be conducted in accordance with the Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle, or the most recent USFWS VELB guidance at the time of the surveys. If VELB are located prior to construction, then pursuant to the Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle, the following measures shall be implemented:* • *All occupied elderberry shrubs (which are defined for the purposes of this mitigation measure as those with stems greater than one inch in diameter at ground level) shall be avoided completely during construction, with a buffer of at least 20 feet, and the following avoidance and minimization measures during construction (as outlined in the Framework for Assessing Impacts to the Valley*	Placer County Community Development Resource Agency USFWS	No more than three years prior to commencement of construction or grading of a Western Rezone Site	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Elderberry Longhorn Beetle) shall be implemented for all work within 165 feet of a shrub: o *All areas to be avoided during construction activities shall be fenced and/or flagged as close to the construction limits as feasible;* o *Activities that could damage or kill an elderberry shrub (e.g., trenching, paving, etc.) shall receive an avoidance area of at least 20 feet from the drip-line;* o *A qualified biologist shall provide training for all contractors, work crews, and any on-site personnel on the status of the VELB, its host plant and habitat, the need to avoid damaging the elderberry shrubs, and the possible penalties for non-compliance;* o *A qualified biologist shall monitor the work area at project appropriate intervals to assure that all avoidance and minimization measures are*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		implemented; o *As much as feasible, all activities within 165 feet of an elderberry shrub shall be conducted between August and February;* o *Trimming may remove or destroy VELB eggs and/or larvae and may reduce the health and vigor of the elderberry shrub. In order to avoid and minimize adverse effects to VELB when trimming, trimming shall occur between November and February and shall avoid the removal of any branches or stems that are greater than or equal to one inch in diameter. Measures to address regular and/or large-scale maintenance (trimming) shall be established in consultation with the USFWS.* o *Herbicides shall not be used within the drip-line of the shrub. Insecticides shall not be used within 100 feet of an elderberry shrub. All chemicals shall be applied using a backpack sprayer or similar direct*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		application method; o *Mechanical weed removal within the drip-line of the shrub shall be limited to the season when adults are not active (August to February) and shall avoid damaging the elderberry; and* o *Erosion control shall be implemented and the affected area shall be re-vegetated with appropriate native plants.* *If an elderberry shrub occupied with VELB must be removed to accommodate construction, then the applicant shall notify the County and consult with USFWS and abide by the mitigation measures developed during the course of the consultation.* *Special-Status Salmonoids* Placer County Conservation Program Sites *5-2(j) If development of a Western Rezone Site covered under the PCCP requires structural changes to a stream channel bed of a salmonid stream as part of the project design, then PCCP Species Condition 7 shall be implemented, as follows:*	Placer County Community Development Resource Agency NMFS CDFW	Prior to the commencement of construction or grading of a Western Rezone Site that requires structural changes to a stream channel bed of a salmonid stream as	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		PCCP Species Condition 7: Streamflow through new and replacement culverts, bridges, and over stream gradient control structures must meet the velocity, depth, and other passage criteria for salmonid streams as described by the National Marine Fisheries Service (NMFS) and CDFW guidelines or as developed in cooperation with NMFS and CDFW to accommodate site-specific conditions (Guidelines for Salmonid Passage at Stream Crossings [National Marine Fisheries Service 2001]. *Fish passage through dewatered channel sections shall be maintained at all times during the adult and juvenile migration season on streams with Covered Species to allow for unimpeded passage of migrating adults and juveniles (smolts). In addition, fish passage shall be maintained during summer on streams supporting summer rearing of Covered Species to allow for seasonal movement of resident (over-summering) fish when the natural channel segment within the vicinity of work areas also supports the movement of resident fish.* *To allow for fish passage, the diversion shall:* • *Maintain continuous flows through a low flow channel in the channel*		part of the project design	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		bed or an adjacent artificial open channel. • *Present no vertical drops exceeding six inches and follow the natural grade of the site.* • *Maintain water velocities that shall not exceed 1.5 feet per second and provide velocity refugia, as necessary.* • *Maintain adequate water depths consistent with normal conditions in the project reach.* • *Be lined with cobble/gravel to simulate stream bottom conditions.* • *Be checked daily to prevent accumulation of debris at diversion inlet and outlet.* *A closed conduit pipe shall not be used for fish passage. Pipes may be used to divert flow through dewatered channel segments on streams that do not support migratory species, or during low flow conditions when the channel segment within the vicinity of work areas at the time of construction does not support movement of fish.* *Prior to the start of work or during the installation of water diversion structures, if fish Covered Species are present and it is determined that they could be injured or killed by construction activities, a qualified*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		biologist will first attempt to gently herd fish Covered Species away from work areas and exclude them from work areas with nets, if practicable. If herding is not practicable or ineffective, a qualified biologist shall capture fish Covered Species and transfer them to another appropriate reach. In considering the relocation, the qualified biologist shall determine whether relocation is ecologically appropriate using a number of factors, including site conditions, system carrying capacity for potential relocated fish, and flow regimes (e.g., if flows are managed). If fish Covered Species are to be relocated, the following factors shall be considered when selecting release site(s): • *Similar (within 3.6 degrees Fahrenheit [2 degrees Celsius]) water temperature as capture location. In addition, fish must be held in water that is at the same temperature as release sites at time of release. If raising or lowering of water temperature in holding apparatus is required, water temperatures in holding apparatus containing fish should not be changed at a rate that exceeds 1.8 degrees Fahrenheit (1 degree Celsius) every two minutes and should not exceed 41 degrees Fahrenheit (5 degrees Celsius) per*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		hour; • *Ample habitat availability prior to release of captured individuals;* • *Presence of others of the same species so that relocation of new individuals will not upset the existing prey/predation function;* • *Carrying capacity of the relocation location;* • *Potential for relocated individual to transport disease; and* • *Low likelihood of fish reentering work site or becoming impinged on exclusion net or screen.* *Capture and relocation of fish Covered Species is not required at individual project sites when site conditions preclude reasonably effective operation of capture gear and equipment, or when the safety of the biologist conducting the capture may be compromised.* *If salmonid spawning gravel is present, spawning gravel cleaning and replacement activities should be timed to occur during the dry season and after fry have emerged from the gravel (generally July 1 through October 1). Applicants may submit requests for extension of this work window to the PCA for review by CDFW and NMFS. In streams that receive summer irrigation flows, spawning gravel*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		cleaning and replacement activities should be timed to occur after the irrigation season has ended and stream flows are at a minimum to minimize the need for site dewatering (if needed) and to minimize the potential for downstream turbidity and sedimentation effects. If dewatering is needed, other applicable Avoidance and Minimization Measures shall be implemented prior to commencing spawning gravel cleaning and replacement activities. Gravel to be placed in streams shall be washed (to remove fines), rounded (i.e., non-angular) and spawning-sized (between 0.4 and 4.0 inches [10 to 100 millimeters] in diameter). For gravel augmentation projects, gravels should be placed such that high flows naturally sort and distribute the material. *If riprap is required to be placed below the ordinary high-water mark (OHWM), it shall have a cleanliness value of no less than 85 percent and shall be covered with clean, uncrushed rock consistent with NMFS spawning gravel size requirements (currently 98 to 100 percent of the clean, uncrushed rock must pass through a 4-inch sieve, and 60 to 80 percent must pass through a 2-inch sieve). Of the total volume of rock placed, 50 percent shall consist of clean, uncrushed rock. This measure may be updated with more current standards.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Projects affecting riverine constituent habitat in a salmonid stream will be assessed a special habitat fee based on linear feet of impact. This will apply to both permanent and temporary impacts.			
		5-2(k) Implement Mitigation Measure 5-4(d).	See Mitigation Measure 5-4(d)	See Mitigation Measure 5-4(d)	
		Sites Not Covered under the Placer County Conservation Program			
		5-2(l) If salmonid habitat occurs within or adjacent to a Western Rezone Site not covered under the PCCP, then the provisions of this mitigation measure shall be implemented, as follows: *Work adjacent to salmonid habitat could result in water quality impacts if appropriate runoff, erosion, and sediment control Best Management Practices (BMPs) are not implemented. Therefore, the project applicant shall prepare a Stormwater Pollution Prevention Plan (SWPPP) for the project prior to County approval of any permit authorizing construction and implement the SWPPP during construction. Examples of BMPs that may be specified by the Certified Professional in Erosion and Sediment Control (CPESC) that prepares the SWPPP include silt fencing between any areas of ground disturbance and salmonid habitat, straw wattles or straw bales*	Placer County Community Development Resource Agency	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		around drop inlets, compaction and hydroseeding of bare soil following construction, and locating concrete washouts, refueling areas, and materials storage, etc. a minimum of 300 feet from salmonid habitat. *If salmonid habitat cannot be entirely avoided, then the project applicant shall consult with NMFS prior to County approval of any permit authorizing construction and abide by the mitigation measures developed during the course of the consultation. A copy of the mitigation measures shall be submitted to the Placer County Community Development Resource Agency. The mitigation measures could include, but not be limited to, limiting in-stream work to low-flow periods when fish are less likely to be present, requiring acoustic monitoring of pile driving within salmonid habitat to ensure that sound levels do not cause mortality to fish, requiring sound attenuation resin block during pile driving between the drive hammer strike face and the steel piling to avoid direct steel on steel impacts, and water diversions, and fish relocations for any dewatering work. Additional measures could include preservation, restoration, or enhancement of habitat on- or off-site, purchase of habitat credits from an agency-approved mitigation/conservation bank, working*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		with a local land trust to preserve land, or any other method acceptable to USFWS. *California red-legged frog* <u>Placer County Conservation Program Sites</u> *5-2(m) If potential habitat for California red-legged frog occurs within a Western Rezone Site covered under the PCCP, implement Mitigation Measures 5-2(j), 5-2(s), 5-3(a), 5-4(d), 5-4(e), 5-4(f), 5-4(g), and 5-6(d).* <u>Sites Not Covered under the Placer County Conservation Program</u> *5-2(n) If potential habitat for California red-legged frog occurs within a Western Rezone Site not covered under the PCCP, then a California red-legged frog habitat assessment shall be conducted by a qualified biologist in accordance with the USFWS Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog, prior to County approval of any permit authorizing construction. If the habitat assessment finds that California red-legged frog may be present, protocol-level surveys consisting of a total of eight surveys shall be conducted according to the timing and methodology outlined in the USFWS guidance to determine the presence or presumed absence of California red-*	See Mitigation Measures 5-2(j), 5-2(s), 5-3(a), 5-4(d), 5-4(e), 5-4(f), 5-4(g), and 5-6(d) Placer County Community Development Resource Agency USFWS	See Mitigation Measures 5-2(j), 5-2(s), 5-3(a), 5-4(d), 5-4€, 5-4(f), 5-4(g), and 5-6(d) Prior to approval of any construction or grading permits for a Western Rezone Site	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		legged frog. If California red-legged frogs are not identified during the surveys, then further mitigation is not required. The results of the surveys shall be submitted to the Placer County Community Development Resource Agency and shall be valid for two years, unless determined otherwise on a case-by-case basis by the USFWS. If California red-legged frogs are identified during the surveys, the applicant shall notify the County and consult with the USFWS regarding impacts to California red-legged frog, and abide by mitigation measures developed during the course of the consultation. The mitigation measures could include, but not be limited to, seasonal work restrictions for initial ground disturbance, preconstruction surveys by a qualified biologist, the installation of wildlife exclusion fencing, biological monitoring, and worker environmental awareness training. Additional measures could include preservation, restoration, or enhancement of habitat on- or off-site, purchase of habitat credits from an agency-approved mitigation/conservation bank, working with a local land trust to preserve land, or any other method acceptable to USFWS. *Western Spadefoot* Western spadefoot is not covered under the PCCP; thus, the following mitigation measures apply to both the PCCP and non-PCCP rezone sites.			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		5-2(o)	*If a Western Rezone Site has the potential to support western spadefoot, then western spadefoot surveys shall be conducted prior to commencement of construction. The project applicant shall survey all suitable aquatic habitat within the rezone site (including features proposed for avoidance) by sampling the features thoroughly with dipnets during March or early April, when spadefoot tadpoles would be present. In addition, one nocturnal acoustic survey of all areas within 300 feet of vernal pools and seasonal wetlands shall be conducted. Acoustic surveys consist of walking through the area and listening for the distinctive snore-like call of the species. Timing and methodology for the aquatic and acoustic surveys shall be based on those described in Distribution of the Western Spadefoot (Spea hammondii) in the Northern Sacramento Valley of California, with Comments on Status and Survey Methodology. If both the aquatic survey and the nocturnal acoustic survey are negative, further mitigation shall not be necessary. The results of the survey shall be submitted to the Placer County Community Development Resource Agency.* *If western spadefoot are observed within aquatic habitat proposed for impact, the tadpoles shall be captured and relocated*	Placer County Community Development Resource Agency	Prior to commencement of construction or grading of a Western Rezone Site	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		to an off-site open space preserve with suitable habitat in the vicinity of the rezone site. If western spadefoot are observed within aquatic habitat proposed for avoidance, then the applicant's qualified biologist may either relocate the tadpoles to an off-site open space preserve with habitat of equivalent or greater value (e.g., vernal pools and seasonal wetlands in a grassland/woodland matrix) in the vicinity of the rezone site, or install silt fence or other solid barrier fencing along the edge of the proposed impact area within 300 feet of the occupied aquatic habitat to prevent metamorphosed individuals from dispersing into the construction area. *Northwestern Pond Turtle* Placer County Conservation Program Sites *5-2(p) If potential habitat for northwestern pond turtle occurs within a Western Rezone Site covered under the PCCP, implement Mitigation Measures 5-2(j), 5-2(s), 5-3(a), 5-4(d), 5-4(e), 5-4(f), 5-4(g), and 5-6(d).*	See Mitigation Measures 5-2(j), 5-2(s), 5-3(a), 5-4(d), 5-4(e), 5-4(f), 5-4(g), and 5-6(d)	See Mitigation Measures 5-2(j), 5-2(s), 5-3(a), 5-4(d), 5-4(e), 5-4(f), 5-4(g), and 5-6(d)	
		Sites Not Covered under the Placer County Conservation Program *5-2(q) If northwestern pond turtle habitat occurs within a Western Rezone Site not covered under the PCCP or any Eastern Rezone Site, the provisions of this mitigation measure shall be implemented, as*	Placer County Community Development Resource Agency	No more than 48 hours prior to commencement of construction or grading of a Western	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		follows: *A northwestern pond turtle survey shall be conducted, at most, 48 hours prior to construction where construction activities overlap with suitable aquatic habitat, as well as of woodlands within 150 feet of the foregoing aquatic resources. The results of the survey shall be submitted to the Placer County Community Development Resource Agency. If northwestern pond turtles or their nests are not found, further mitigation is not necessary.* *If a northwestern pond turtle is observed within the proposed impact area, a qualified biologist shall relocate the individual to habitat of equivalent or greater value (e.g., riparian wetlands or riparian woodlands adjacent to a perennial creek or intermittent drainage) outside of the proposed impact area prior to construction. If a northwestern pond turtle nest is observed within the proposed impact area, the nest shall be fenced off and avoided until the eggs hatch. The exclusion fencing shall be placed, at a minimum, 25 feet from the nest. A qualified biologist shall monitor the nest daily during construction to ensure that hatchlings do not disperse into the construction area. Relocation of hatchlings shall occur as stipulated above, if necessary.*		or Eastern Rezone Site	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Blaineville's Horned Lizard Blaineville's horned lizard is not covered under the PCCP; thus, the following mitigation measures apply to both the PCCP and non-PCCP rezone sites. *5-2(r) If Blainville's horned lizard habitat occurs within a Western Rezone Site, the provisions of this mitigation measure shall be implemented, as follows:* *Within 14 days prior to the initiation of any construction activities, a qualified biologist shall conduct preconstruction surveys for coast (Blainville's) horned lizard in suitable habitat that will be disturbed by construction activity. If Blainville's horned lizards are found prior to the initiation of, and/or during, construction activities, a qualified biologist shall relocate the lizard outside of the rezone site. The results of the survey shall be submitted to the Placer County Community Development Resource Agency.* *Tricolored Blackbird* <u>Placer County Conservation Program Sites</u> *5-2(s) If nesting or foraging tricolored blackbird has potential to occur within or adjacent to a Western Rezone Site covered under the PCCP, then the provisions of PCCP Species Condition 4 shall be implemented, as follows:*	Placer County Community Development Resource Agency Placer County Community Development Resource Agency	Within 14 days prior to the commencement of construction or grading of a Western Rezone Site Prior to commencement of construction or grading of a Western Rezone Site	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		PCCP Species Condition 4: Prior to initiation of Covered Activities, the qualified biologist(s) shall conduct preconstruction surveys to evaluate the presence of tricolored blackbird nesting colonies. In instances where an adjacent parcel is not accessible to survey because the qualified biologist was not granted permission to enter, the qualified biologist shall scan all potential nest colony site(s) from the adjacent property, roadsides, or other safe, publicly accessible viewpoints, without trespassing, using binoculars and/or a spotting scope to look for tricolored blackbird nesting activity. *Surveys shall be conducted at least twice, with at least one month between surveys, during the nesting season one year prior to initial ground disturbance for the Covered Activity (if feasible), and the year of ground disturbance for the Covered Activity (required). If Covered Activities will occur in the project work area during the nesting season, three surveys shall be conducted within 15 days prior to the Covered Activity, with one of the surveys occurring within five days prior to the start of the Covered Activity. The survey methods will be based on Kelsey (2008) or a similar protocol approved by the PCA and the Wildlife Agencies based on site-specific conditions.*	Placer Conservation Authority CDFW USFWS		

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		If the first survey indicates that suitable nesting habitat is not present on the project site or within 1,300 feet of the project work area, additional surveys for nest colonies are not required. *If an active tricolored blackbird colony is known to occur within three miles of the project site, a qualified biologist shall conduct two surveys of foraging habitat within the project site and within a 1,300-foot radius around the project site to determine whether foraging habitat is being actively used by foraging tricolored blackbirds. The qualified biologist shall map foraging habitat, as defined by the land cover types listed above, within a 1,300-foot radius around the project site to delineate foraging habitat that will be surveyed. The surveys shall be conducted approximately one week apart, with the second survey occurring no more than five calendar days prior to ground-disturbing activities.* *Each survey shall last four hours, and begin no later than 8:00 a.m. The qualified biologist shall survey the entire project site and a 1,300-foot radius around the project site by observing and listening from accessible vantage points that provide views of the entire survey area. If such vantage points are not available, the qualified biologist shall survey from*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		multiple vantage points to ensure that the entire survey area is surveyed. In instances where an adjacent parcel is not accessible to survey because the qualified biologist was not granted permission to enter, the qualified biologist shall scan all foraging habitat from the adjacent property, roadsides, or other safe, publicly accessible viewpoints, without trespassing, using binoculars and/or a spotting scope to look for tricolored blackbird foraging activity. The qualified biologist shall map the locations on the site and within a 1,300-foot radius around the project site where tricolored blackbirds are observed and record an estimate of the numbers of tricolored blackbirds observed (estimated by 10s, 100s, or 1,000s), the frequency of visits (e.g., if individuals or a flock makes repeated foraging visits to the site during the survey period), whether tricolored blackbirds are leaving the site with food in their bills, and the direction they fly to/from. *If a tricolored blackbird nesting colony is identified during surveys, then construction activity or other covered activities that may disturb the occupied nest colony site, as determined by a qualified biologist, will be prohibited during the nesting season (March 15 through July 31 or until the chicks have fledged or the colony has been abandoned on its*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		own) within a 1,300-foot buffer zone around the nest colony, to the extent practicable. The intent of this condition is to prevent disturbance to occupied nest colony sites on or near project sites so they can complete their nesting cycle. This condition is not intended to preserve suitable breeding habitat on project sites but to ensure impacts to active colony sites only take place once the site is no longer occupied by the nesting colony. The buffer will be applied to extend beyond the nest colony site as follows: 1) if the colony is nesting in a wetland, the buffer must be established from the outer edge of all hydric vegetation associated with the colony, or 2) if the colony is nesting in non-wetland vegetation (e.g., Armenian blackberry), the buffer must be established from the edge of the colony substrate. This buffer may be modified to a minimum of 300 feet, with written approval from the Wildlife Agencies, in areas with dense forest, buildings, or other features between the Covered Activities and the occupied active nest colony; where there is sufficient topographic relief to protect the colony from excessive noise or visual disturbance; where sound curtains have been installed; or other methods developed in consultation with the Wildlife Agencies where conditions warrant reduction of the buffer distance. If tricolored blackbirds colonize habitat			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		adjacent to Covered Activities after the activities have been initiated, the project applicant shall reduce disturbance through establishment of buffers or noise reduction techniques or visual screens, as determined in consultation with the Wildlife Agencies and PCA. The buffer must be clearly marked to prevent project-related activities from occurring within the buffer zone. *If tricolored blackbird foraging habitat was found to be actively used during at least one of the foraging habitat surveys, then construction activity or other covered activities that may disturb foraging tricolored blackbirds, as determined by a qualified biologist, will be prohibited within 1,300 feet of the foraging site to the extent feasible during the nesting season (March 15 through July 31 or until the chicks have fledged or the colony has been abandoned on its own) if the foraging habitat was found to be actively used by foraging tricolored blackbirds during at least one of the two foraging habitat surveys conducted under Tricolored Blackbird 2. If survey results indicate that the area provides marginal foraging habitat (e.g., tricolored blackbirds were observed foraging, but only briefly, and most were not successfully capturing prey), or site-specific conditions may warrant a reduced buffer, the PCA*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		technical staff will consult with the Wildlife Agencies to evaluate whether the project needs to avoid the foraging habitat or whether a reduced buffer may be appropriate. In such cases, additional surveys may be needed to assess site conditions and the value of the foraging habitat. *The buffer must be clearly marked to prevent project-related activities from occurring within the buffer zone. This buffer may be modified to a minimum of 300 feet, with written approval from the Wildlife Agencies, in areas with dense forest, buildings, or other features between the Covered Activities and the actively used foraging habitat; where there is sufficient topographic relief to protect foraging birds from excessive noise or visual disturbance; or in consultation with the Wildlife Agencies if other conditions warrant reduction of the buffer distance. If tricolored blackbird begins using foraging habitat adjacent to Covered Activities after the activities have been initiated, the project applicant shall reduce disturbance through establishment of buffers or noise reduction techniques or visual screens, as determined in consultation with the Wildlife Agencies and PCA.* *The intent of this condition is to allow actively nesting colonies on or near*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		project sites to complete their nesting cycle prior to the loss of the foraging habitat on site. Protecting actively used-foraging habitat during the nesting season will help to enable the tricolored blackbird nesting colony to complete its nesting cycle, as loss of valuable foraging habitat could cause the nesting colony to fail. This condition is not intended to preserve suitable foraging habitat on project sites in the long term.) *Active nesting colonies that occur within the no-disturbance buffer shall be monitored by the qualified biologist(s) to verify the Covered Activity is not disrupting the nesting behavior of the colony. The frequency of monitoring will be approved by the PCA and based on the frequency and intensity of construction activities and the likelihood of disturbance of the active nest. In most cases, monitoring will occur at least every other day, but in some cases, daily monitoring may be appropriate to ensure that direct effects on tricolored blackbird are minimized. The biologist will train construction personnel on the avoidance procedures and buffer zones.* *If the qualified biologist(s) determines that the Covered Activity is disrupting nesting and/or foraging behavior, the qualified biologist(s) shall notify the project*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		applicant immediately, and the project applicant shall notify the PCA within 24 hours to determine additional protective measures that can be implemented. The qualified biologist(s) shall have the authority to stop Covered Activities until additional protective measures are implemented. Additional protective measures shall remain in place until the qualified biologist(s) determine(s) tricolored blackbird behavior has normalized. If additional protective measures are ineffective, the qualified biologist(s) shall have the authority to stop Covered Activities as needed until the additional protective measures are modified and nesting behavior of tricolored blackbird returns to normal. *Additional protective measures may include increasing the size of the buffer (within the constraints of the project site), delaying Covered Activities (or the portion of Covered Activities causing the disruption) until the colony is finished breeding and chicks have left the nest site, temporarily relocating staging areas, or temporarily rerouting access to the project work area. The project proponent shall notify the PCA and Wildlife Agencies within 24 hours if nests or nestlings are abandoned. If the nestlings are still alive, the qualified biologist(s) shall work with the Wildlife Agencies to determine*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		appropriate actions for salvaging the eggs or nestlings. Notification to PCA and Wildlife Agencies shall be via telephone or email, followed by a written incident report. Notification shall include the date, time, location, and circumstances of the incident. *Foraging habitat within the buffer shall be monitored by the qualified biologist(s) to verify that the Covered Activity is not disrupting tricolored blackbird foraging behavior. The frequency of monitoring will be approved by the PCA and based on the frequency and intensity of construction activities and the likelihood of disturbance of foraging tricolored blackbirds. In most cases, monitoring will occur at least every other day, but in some cases, daily monitoring may be appropriate to ensure that effects on tricolored blackbird are minimized. The biologist will train construction personnel on the avoidance procedures and buffer zones.* *If the qualified biologist(s) determines that the Covered Activity is disrupting foraging behavior, the qualified biologist(s) shall notify project applicant immediately, and the project applicant shall notify the PCA within 24 hours to determine additional protective measures that can be implemented. The qualified biologist(s) shall have the authority to stop Covered*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Activities until additional protective measures are implemented. Additional protective measures shall remain in place until the qualified biologist(s) determine(s) tricolored blackbird behavior has normalized. If additional protective measures are ineffective, the qualified biologist(s) shall have the authority to stop Covered Activities as needed until the additional protective measures are modified and foraging behavior of tricolored blackbird returns to normal. Additional protective measures may include increasing the size of the buffer (within the constraints of the project site), temporarily relocating staging areas, or temporarily rerouting access to the project work area. <u>Sites Not Covered under the Placer County Conservation Program</u> *5-2(t) Implement Mitigation Measure 5-2(ac).* *Burrowing Owl* <u>Placer County Conservation Program Sites</u> *5-2(u) If burrowing owl has potential to occur within or adjacent to a Western Rezone Site covered under the PCCP, then the provisions of PCCP Species Condition 3 shall be implemented, as follows:*	See Mitigation Measure 5-2(ac) Placer County Community Development Resource Agency	See Mitigation Measure 5-2(ac) Within 15 days prior to ground disturbance of a Western Rezone Site	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		PCCP Species Condition 3: Two surveys shall be conducted within 15 days prior to ground disturbance to establish the presence or absence of burrowing owls. The surveys shall be conducted at least seven days apart (if burrowing owls are detected on the first survey, a second survey is not needed) for both breeding and non-breeding season surveys. All burrowing owls observed shall be counted and mapped. *During the breeding season (February 1 to August 31), surveys shall document whether burrowing owls are nesting in or within 250 feet of the project area. During the non-breeding season (September 1 to January 31), surveys shall document whether burrowing owls are using habitat in or directly adjacent to any area to be disturbed. Survey results will be valid only for the season (breeding or non-breeding) during which the survey was conducted.* *The Qualified Biologist shall survey the proposed footprint of disturbance and a 250-foot radius from the perimeter of the proposed footprint to determine the presence or absence of burrowing owls. The site will be surveyed by walking line transects, spaced 20 to 60 feet apart, adjusting for vegetation height and density. At the start of each transect and, at least, every 300 feet, the surveyor, with*	Placer Conservation Authority		

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		use of binoculars, shall scan the entire visible project area for burrowing owls. During walking surveys, the surveyor shall record all potential burrows used by burrowing owls, as determined by the presence of one or more burrowing owls, pellets, prey remains, whitewash, or decoration. Some burrowing owls may be detected by their calls; therefore, observers will also listen for burrowing owls while conducting the survey. Adjacent parcels under different land ownership shall be surveyed only if access is granted. If portions of the survey area are on adjacent sites for which access has not been granted, the qualified biologist shall get as close to the non-accessible area as possible, and use binoculars to look for burrowing owls. *The presence of burrowing owls or their sign anywhere on the site or within the 250-foot accessible radius around the site shall be recorded and mapped. Surveys shall map all burrows and occurrence of sign of burrowing owl on the project site. Surveys must begin one hour before sunrise and continue until two hours after sunrise (3 hours total) or begin two hours before sunset and continue until one hour after sunset. Additional time may be required for large project sites.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		If one or more burrowing owl or evidence of their presence at or near a burrow entrance is found during the breeding season (approximately February 1 to August 31), the project applicant shall avoid all nest sites that could be disturbed by project construction during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups foraging on or near the site following fledging). The applicant shall establish a 250-foot non-disturbance buffer zone around nests. The buffer zone shall be flagged or otherwise clearly marked. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer will be increased such that activities are far enough from the nest so that the bird(s) no longer display this agitated behavior. The exclusionary buffer will remain in place until the chicks have fledged or as otherwise determined by a qualified biologist. Construction may only occur within the 250-foot buffer zone during the breeding season if a qualified raptor biologist monitors the nest and determines that the activities do not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved off-site.			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Measures such as visual screens may be used to further reduce the buffer with Wildlife Agency approval and provided a biological monitor confirms that such measures do not cause agitated behavior. *If one or more burrowing owls or evidence of their presence at or near a burrow entrance is found during the non-breeding season (approximately September 1 to January 31), the project applicant shall establish a 160-foot buffer zone around active burrows. The buffer zone shall be flagged or otherwise clearly marked. Measures such as visual screens may be used to further reduce the buffer with Wildlife Agency approval and provided a biological monitor confirms that such measures do not cause agitated behavior. After all alternative avoidance and minimization measures are exhausted as confirmed by the Wildlife Agencies, a qualified biologist may passively exclude birds from those burrows during the non-breeding season. A burrowing owl exclusion plan shall be developed by a qualified biologist consistent with the most recent guidance from the Wildlife Agencies (e.g., California Department of Fish and Game 2012) and submitted to and approved by the PCA and the Wildlife Agencies. Burrow exclusion will be conducted for burrows located in the project footprint and within a 160-foot*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		buffer zone as necessary. *A biological monitor shall be present on site daily to ensure that no Covered Activities occur within the buffer zone (if one is established as described above). The qualified biologist performing the construction monitoring shall ensure that effects on burrowing owls are minimized. If monitoring indicates that construction outside of the buffer is affecting nesting, the buffer shall be increased if space allows (e.g., move staging areas farther away). If space does not allow, construction shall cease until the young have fledged from all the nests in the colony (as confirmed by a qualified biologist) or until the end of the breeding season, whichever occurs first.* *A biological monitor shall conduct training of construction personnel on the avoidance procedures, buffer zones, and protocols in the event a burrowing owl flies into an active construction zone.* <u>Sites Not Covered under the Placer County Conservation Program</u> *5-2(v) If nesting burrowing owl habitat has potential to occur within or adjacent to a Western Rezone Site not covered under the PCCP, a targeted burrowing owl nest survey shall be conducted of all accessible areas within 500 feet of the proposed construction area within 15 days*	Placer County Community Development Resource Agency CDFW	Within 15 days prior to commencement of construction or grading of a Western Rezone Site	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		prior to construction activities utilizing 60-foot transects, as outlined in the Staff Report on Burrowing Owl Mitigation (Staff Report). A report summarizing the survey(s) shall be submitted to the Placer County Community Development Resource Agency within 30 days of the completed survey and is valid for one construction season. If an active burrowing owl nest burrow (i.e., occupied by more than one adult owl, and/or juvenile owls are observed) is found within 250 feet of a construction area, construction shall cease within 250 feet of the nest burrow until the qualified biologist determines that the young have fledged or determines that the nesting attempt has failed. If the applicant desires to work within 250 feet of the nest burrow, the applicant shall consult with CDFW and the County to determine if the nest buffer can be reduced. *If the qualified biologist determines that the size of the non-disturbance buffer requires the qualified biologist to monitor the nest, monitoring shall include observations about the birds' behaviors relative to the construction activities. Should construction activities cause a nesting bird to do any of the following in a way that would be considered a result of construction activities: vocalize, make defensive flights at intruders, get up from*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		a brooding position, or fly off the nest, then the exclusionary buffer shall be increased such that activities are far enough from the nest to stop this agitated behavior. The revised non-disturbance buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with the County. *Construction activities may only resume within the non-disturbance buffer after a follow-up survey by the qualified biologist has been conducted and a report has been prepared indicating that the nest (or nests) is not active, and that new nests have not been identified.* *If construction begins during the non-nesting season, (September 1 through the 14 February), the applicant shall conduct a survey for burrows or debris that represent suitable nesting habitat for burrowing owls within areas of proposed ground disturbance. If overwintering owls are located and cannot be avoided, the applicant may exclude any burrowing owls observed and collapse any burrows or remove the debris in accordance with the methodology outlined in the Staff Report. In accordance with the Staff Report, prior to burrow exclusion and/or closure, a Burrowing Owl Exclusion Plan must be developed and approved by CDFW. As*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		outlined in the Staff Report, components of this plan shall include, but not be limited to, the following: 1. *Confirm by site surveillance that the burrow(s) is empty of burrowing owls and other species preceding burrow scoping;* 2. *Type of scope and appropriate timing of scoping to avoid impacts;* 3. *Occupancy factors to look for and what will guide determination of vacancy and excavation timing (one-way doors should be left in place 48 hours to ensure burrowing owls have left the burrow before excavation, visited twice daily, and monitored for evidence that owls are inside and can't escape [i.e., look for signs immediately inside the door]);* 4. *How the burrow(s) will be excavated. Excavation using hand tools with refilling to prevent reoccupation is preferable whenever possible (may include using piping to stabilize the burrow to prevent collapsing until the entire burrow has been excavated and it can be determined that owls do not reside inside the burrow);* 5. *Removal of other potential owl burrow surrogates or refugia on-site;*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		6. *Photographing the excavation and closure of the burrow to demonstrate success and sufficiency;* 7. *Monitoring of the site to evaluate success and, if needed, to implement remedial measures to prevent subsequent owl use to avoid take; and* 8. *How the impacted site will continually be made inhospitable to burrowing owls and fossorial mammals (e.g., by allowing vegetation to grow tall, heavy disking, or immediate and continuous grading) until development is complete.*			
		5-2(w) *If any nesting burrowing owls are found during the breeding season preconstruction survey set forth by Mitigation Measure 5-2(v), mitigation for the permanent loss of burrowing owl foraging habitat (defined as all areas of suitable habitat within 250 feet of an active nest burrow) shall be accomplished at a 1:1 ratio. The mitigation provided shall be consistent with recommendations in the Staff Report and may be accomplished within the Swainson's Hawk Foraging Habitat mitigation area (as detailed in Mitigation Measure 5-2[z] below) if burrowing owls have been documented utilizing that area, or if the qualified*	Placer County Community Development Resource Agency	Prior to commencement of construction or grading	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		biologist and the County determine that the area is suitable. The Staff Report recommendations for mitigation land for burrowing owls are as follows: • *Where habitat will be temporarily disturbed, restore the disturbed area to pre-project condition, including de-compacting soil and revegetating. Permanent habitat protection may be warranted if potential exists that the temporary impacts may render a nesting site (nesting burrow and satellite burrows) unsustainable or unavailable depending on the time frame, resulting in reduced survival or abandonment. For the latter potential impact, see the permanent impact measures below.* • *Mitigate for permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced based on the information provided in Appendix A (of the Staff Report). Note: A minimum habitat replacement recommendation is not provided here as it has been shown to serve as a default, replacing any site-specific analysis*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		and discounting the wide variation in natal area, home range, foraging area, and other factors influencing burrowing owls and burrowing owl population persistence in a particular area. • *Mitigate for permanent impacts to nesting, occupied and satellite burrows and burrowing owl habitat with (a) permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals. The mitigation lands may require habitat enhancements including enhancement or expansion of burrows for breeding, shelter and dispersal opportunity, and removal or control of population stressors. If the mitigation lands are located adjacent to the impacted burrow site, ensure the nearest neighbor artificial or natural burrow clusters are at least within 210 meters.* • *Permanently protect mitigation land through a conservation easement deeded to a non-profit conservation*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		organization or public agency with a conservation mission, for the purpose of conserving burrowing owl habitat and prohibiting activities incompatible with burrowing owl use. If the project is located within the service area of a Department-approved burrowing owl conservation bank, the project proponent may purchase available burrowing owl conservation bank credits. • *Develop and implement a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls (see Management Plan and Artificial Burrow sections below, if applicable).* • *Fund the maintenance and management of mitigation land through the establishment of a long-term funding mechanism, such as an endowment.* • *Habitat should not be altered or destroyed, and burrowing owls should not be excluded from burrows, until mitigation lands have been legally secured, are managed for the benefit of burrowing owls according to Department-approved management, monitoring and reporting plans, and the*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		endowment or other long-term funding mechanism is in place or security is provided until these measures are completed. • *Mitigation lands should be on, adjacent, or proximate to the impact site, where possible, and where habitat is sufficient to support burrowing owls present. Where there is insufficient habitat on, adjacent to, or near project sites where burrowing owls will be excluded, acquire mitigation lands with burrowing owl habitat away from the project site. The selection of mitigation lands should then focus on consolidating and enlarging conservation areas located outside of urban and planned growth areas, within foraging distance of other conserved lands. If mitigation lands are not available adjacent to other conserved lands, increase the mitigation land acreage requirement to ensure a selected site is of sufficient size. Off-site mitigation may not adequately offset the biological and habitat values impacted on a one-to-one basis. Consult with the Department when determining offsite mitigation acreages.* • *Evaluate and select suitable*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		mitigation lands based on a comparison of the habitat attributes of the impacted and conserved lands, including but not limited to: type and structure of habitat being impacted or conserved; density of burrowing owls in impacted and conserved habitat; and significance of impacted or conserved habitat to the species range-wide. Mitigate for the highest quality burrowing owl habitat impacted first and foremost when identifying mitigation lands, even if a mitigation site is located outside of a lead agency's jurisdictional boundary, particularly if the lead agency is a city or special district. • *Select mitigation lands taking into account the potential human and wildlife conflicts or incompatibility, including but not limited to, human foot and vehicle traffic, and predation by cats, loose dogs, and urban-adapted wildlife, and incompatible species management (i.e., snowy plover).* • *Where a burrowing owl population appears to be highly adapted to heavily altered habitats such as golf courses, airports, athletic fields, and business complexes, permanently protecting the land, augmenting the site with artificial*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		burrows, and enhancing and maintaining those areas may enhance sustainability of the burrowing owl population on-site. Maintenance includes keeping lands grazed or mowed with weed eaters or push mowers, free from trees and shrubs, and preventing excessive human and human-related disturbance (e.g., walking, jogging, off-road activity, dog-walking) and loose and feral pets (chasing and, presumably, preying upon owls) that make the environment uninhabitable for burrowing owls. Items 4, 5, and 6 also still apply to this mitigation approach. • *If there are no other feasible mitigation options available and a lead agency is willing to establish and oversee a Burrowing Owl Mitigation and Conservation Fund that funds on a competitive basis acquisition and permanent habitat conservation, the project proponent may participate in the lead agency's program.* *Swainson's Hawk* <u>Placer County Conservation Program Sites</u> *5-2(x) <u>PCCP Species Condition 1</u>: If the project cannot avoid active Swainson's hawk nest*	Placer County Community	If ground-disturbing activities shall take	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		trees or includes ground disturbance within 1,320 feet of an active Swainson's hawk nest and construction must occur during the nesting season (approximately February 1 to September 15), a preconstruction survey shall be conducted within a 1,320-foot radius of the project no more than 15 days prior to ground disturbance. Surveys shall be conducted consistent with current guidelines (Swainson's Hawk Technical Advisory Committee 2000). In instances where an adjacent parcel is not accessible to survey, the qualified biologist shall scan all potential nest trees from the adjacent property, roadsides, or other safe, publicly accessible viewpoints, without trespassing, using binoculars and/or a spotting scope. Surveys are required from February 1 to September 15 (or sooner if it is determined that birds are nesting earlier in the year). If a Swainson's hawk nest is located and presence confirmed, only one follow-up visit is required. *If an occupied or under-construction Swainson's hawk nest is located within 1,320 feet of the project, then during the nesting season (approximately February 1 to September 15 or sooner if it is determined that birds are nesting earlier in the year), ground-disturbing activities within 1,320 feet of occupied nests or nests under construction shall be*	Development Resource Agency Placer Conservation Authority	place between February 1 to September 15, then no more than 15 days prior to commencement of construction or grading	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		prohibited to minimize the potential for nest abandonment. While the nest is occupied, activities outside the buffer can take place provided they do not stress the breeding pair. *If the active nest site is shielded from view and noise from the project site by other development, topography, or other features, the project applicant can apply to the PCA for a reduction in the buffer distance or waiver. A qualified biologist shall be required to monitor the nest and determine that the reduced buffer does not cause nest abandonment. If a qualified biologist determines nestlings have fledged, Covered Activities can proceed normally.* *Construction monitoring shall be conducted by a qualified biologist and shall focus on ensuring that activities do not occur within the buffer zone. The qualified biologist performing the construction monitoring shall ensure that effects on Swainson's hawks are minimized. If monitoring indicates that construction outside of the buffer is affecting nesting, the buffer shall be increased if space allows (e.g., move staging areas farther away). If space does not allow, construction shall cease until the young have fledged from the nest (as confirmed by a qualified biologist).*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		The frequency of monitoring will be approved by the PCA and based on the frequency and intensity of construction activities and the likelihood of disturbance of the active nest. In most cases, monitoring will occur at least every other day, but in some cases, daily monitoring may be appropriate to ensure that direct effects on Swainson's hawks are minimized. The qualified biologist shall train construction personnel on the avoidance procedures and buffer zones. *Active (within the last five years) Swainson's hawk nest trees on a project site shall not be removed during the nesting season. If a nest tree must be removed (as determined by the PCA), tree removal shall occur only between September 15 and February 1, after any young have fledged and are no longer dependent on the nest and before breeding activity begins.* <u>Sites Not Covered under the Placer County Conservation Program</u> *5-2(y) If a rezone site not covered under the PCCP supports Swainson's hawk habitat in areas within or adjacent to the site, a targeted Swainson's hawk nest survey shall be conducted of all accessible areas within a 0.25-mile radius of the proposed construction area, at most, 15 days prior to construction activities. A report*	Placer County Community Development Resource Agency	15 days prior to construction or grading activities	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		summarizing the survey(s) shall be submitted to the Placer County Community Development Resource Agency within 30 days of the completed survey and is valid for one construction season. If nests are not found, further mitigation is not required. *If active Swainson's hawk nests are found within 0.25-mile of a construction area, construction shall cease within 0.25-mile of the nest until the qualified biologist determines that the young have fledged or determines that the nesting attempt has failed. The 0.25-mile buffer may be reduced if a smaller, sufficiently protective buffer is proposed by the qualified biologist and approved by the County after taking into consideration the natural history of the Swainson's hawk, the proposed activity level adjacent to the nest, the nest occupants' habituation to existing or ongoing activity, nest concealment (i.e., whether visual or acoustic barriers between the proposed activity and the nest exist), and what (if any) nest monitoring is proposed.* *When the qualified biologist determines that the size of the non-disturbance buffer requires the qualified biologist to monitor the nest, monitoring shall include observations about the birds' behaviors relative to the construction activities.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Should construction activities cause a nesting bird to do any of the following in a way that would be considered a result of construction activities: vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer shall be increased such that activities are far enough from the nest to stop this agitated behavior. The revised non-disturbance buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with the County. *Construction activities may only resume within the non-disturbance buffer after a follow-up survey by the qualified biologist has been conducted and a report has been prepared indicating that the nest (or nests) is not active, and that new nests have not been identified.*			
		5-2(z) Annual brome grassland that represents suitable foraging habitat for Swainson's hawks (grassland or cropland that is part of a patch of at least five acres in size and below 600 feet amsl) could be permanently impacted during development of the Western Rezone Sites. The potential impacts shall be mitigated through purchase and conservation of similar habitat, prior to County approval of any permit authorizing	Placer County Community Development Resource Agency	Prior to County approval of any permit	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		construction as follows: *A qualified biologist shall conduct a review of Swainson's hawk nest data available, including the California Natural Diversity Database (CNDDB), unprocessed CNDDB records, and contacting CDFW to determine if they have any additional nest data. If desired by the project applicant, the biologist may conduct a survey of the nests to determine if they are still present. The biologist shall provide the Placer County Community Development Resource Agency with a summary of his/her findings.* *If a portion of the rezone site is determined to be within 10 miles of an active Swainson's hawk nest (an active nest is defined as a nest with documented Swainson's hawk use within the past five years), the applicant shall mitigate for the loss of suitable Swainson's hawk foraging habitat by implementing the following measures (as outlined in CDFW's Staff Report regarding Mitigation for Impacts to Swainson's Hawks [Buteo swainsoni] in the Central Valley of California):* • *One acre of suitable foraging habitat shall be protected for each acre of suitable foraging habitat that is proposed to be developed that is within one mile of an active nest.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Protection shall be via purchase of mitigation bank credits or other land protection mechanism acceptable to the County. • *0.75-acre of suitable foraging habitat shall be protected for each acre of suitable foraging habitat that is proposed to be developed that is between one and five miles from an active nest. Protection shall be via purchase of mitigation bank credits or other land protection mechanism acceptable to the County.* • *0.5-acre of suitable foraging habitat shall be protected for each acre of suitable foraging habitat that is proposed to be developed that is between five and 10 miles from an active nest. Protection shall be via purchase of mitigation bank credits or other land protection mechanism acceptable to the County.* *California Spotted Owl* California spotted owl is not covered under the PCCP; thus, the following mitigation measures apply to both the PCCP and non-PCCP rezone sites. *5-2(aa) If a Western Rezone Site has suitable habitat for California spotted owl, a protocol-level nocturnal acoustical survey shall be conducted within 15 days of construction. Broadcast nocturnal acoustical surveys shall be conducted in*	Placer County Community Development Resource Agency	Within 15 days of construction or grading	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		accordance with the Protocol for Surveying Spotted Owl in Proposed Management Activity Areas and Habitat Conservation Areas or the most recent protocol at the time. A report summarizing the survey(s) shall be submitted to the Placer County Community Development Resource Agency within 30 days of the completed survey and is valid for one construction season. *If a spotted owl nest is detected within 500 feet of the construction area, construction shall cease within 500 feet of the nest until the Project Biologist determines that the young have fledged or it is determined that the nesting attempt has failed. If the applicant desires to work within 500 feet of the nest, the applicant shall consult with CDFW and the County to determine if the nest buffer can be reduced.* *If the qualified biologist determines that the size of the non-disturbance buffer requires the qualified biologist to monitor the nest, monitoring shall include observations about the birds' behaviors relative to the construction activities. Should construction activities cause a nesting bird to do any of the following in a way that would be considered a result of construction activities: vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer shall be increased*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		such that activities are far enough from the nest to stop this agitated behavior. The revised non-disturbance buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with the County. *Construction activities may only resume within the non-disturbance buffer after a follow-up survey by the qualified biologist has been conducted and a report has been prepared indicating that the nest (or nests) is not active, and that new nests have not been identified.* *Nesting Birds and Raptors Protected Under the MBTA and CFGC* Nesting birds and raptors protected under the MBTA and CFGC, with exception of those already listed above in this mitigation section, are not covered under the PCCP; thus, the following mitigation measures apply to both the PCCP and non-PCCP rezone sites. *5-2(ab) If a rezone site not covered under the PCCP supports trees and/or unpaved or unmaintained areas, or supports such vegetation/land cover in areas adjacent to the site, implement Mitigation Measure 5-2(ac).* *5-2(ac) If a rezone site not covered under the PCCP supports trees and/or unpaved or unmaintained areas, or supports such*	See Mitigation Measure 5-2(ac) Placer Couty Community Development	See Mitigation Measure 5-2(ac) If construction or grading activities take place during the	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		vegetation/land cover in areas adjacent to the site, nesting bird surveys shall be conducted as detailed below, if construction activities take place during the typical bird breeding/nesting season (typically February 15 through August 31). *Within three days prior to the commencement of construction, preconstruction nesting bird survey shall be conducted by a qualified biologist throughout the portion of the rezone site proposed for construction and all accessible areas within a 500-foot radius of proposed construction areas. A report summarizing the survey(s) shall be submitted to the Placer County Community Development Resource Agency within 30 days of the completed survey and is valid for one construction season. If nests are not found, further mitigation is not required. If a break in construction activity of more than seven days occurs, then subsequent surveys shall be conducted.* *If an active raptor nest is found, construction activities shall not take place within 500 feet of the nest until the young have fledged. If active songbird nests are found, a 100-foot non-disturbance buffer shall be established until the young have fledged. The non-disturbance buffers may be reduced if a smaller, sufficiently*	Resource Agency	typical bird breeding/nesting season (typically February 15 through August 31), then within three days prior to the commencement of work	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		protective buffer is proposed by the qualified biologist and approved by the County after taking into consideration the natural history of the species of bird nesting, the proposed activity level adjacent to the nest, the nest occupants' habituation to existing or ongoing activity, and nest concealment (i.e., whether visual or acoustic barriers between the proposed activity and the nest exist). The qualified biologist can visit the nest as needed to determine when the young have fledged the nest and are independent of the site or the nest can be left undisturbed until the end of the nesting season. *If construction activities continue within the non-disturbance buffer, then the qualified biologist shall be required to monitor the nest. That monitoring shall include observations about the birds' behaviors relative to the construction activities. Should construction activities cause a nesting bird to do any of the following in a way that would be considered a result of construction activities: vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer shall be increased such that activities are far enough from the nest to stop the agitated behavior. The revised non-disturbance buffer shall remain in place until the chicks have*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		fledged or as otherwise determined by a qualified biologist in consultation with the County. *Construction activities without monitoring may only resume within the non-disturbance buffer after a follow-up survey by the qualified biologist has been conducted and a report has been prepared indicating that the nest (or nests) is not active, and that new nests have not been identified.* *Special-Status Bats* Special-status bats are not covered under the PCCP; thus, the following mitigation measures apply to both the PCCP and non-PCCP rezone sites. *5-2(ad) If a rezone site supports trees or structures, then a qualified biologist shall conduct a bat habitat assessment of all potential roosting habitat features, including trees and structures within the proposed impact footprint. The habitat assessment shall identify all potentially suitable roosting habitat and may be conducted up to one year prior to the start of construction. A report summarizing the results of the habitat assessment shall be submitted for review and approval to the Placer County Community Development Resource Agency. If roosting habitat is not found, additional mitigation is not necessary.*	Placer County Community Development Resource Agency	Up to one year prior to the start of construction	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		If potential roosting habitat is identified (cavities in trees or potential roosts within structures) within the areas proposed for impact, the biologist shall survey the potential roosting habitat during the active season (generally April through October or from January through March on days with temperatures in excess of 50 degrees Fahrenheit) to determine presence of roosting bats. The surveys shall be conducted utilizing methods that are considered acceptable by CDFW and bat experts. Methods may include evening emergence surveys, acoustic surveys, inspecting potential roosting habitat with fiberoptic cameras, or a combination thereof. *If roosting bats are identified within any of the trees planned for removal or structures proposed to be demolished, or if presence is assumed, the trees shall be removed outside of pup season, only on days with temperatures in excess of 50 degrees Fahrenheit. Pup season is generally during the months of May through August. Two-step tree removal shall be utilized under the supervision of the qualified biologist. Two-step tree removal involves removal of all branches of the tree that do not provide roosting habitat on the first day, and then the next day cutting down the remaining portion of the tree. Additionally, all other tree removal and/or*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		structure demolition shall be conducted from January through March on days with temperatures in excess of 50 degrees Fahrenheit to avoid potential impacts to foliage-roosting bat species. *If roosting bats are identified within any structures planned for removal, a Bat Exclusion Plan shall be prepared by a qualified bat biologist describing the methods to be used to humanely exclude bats, prior to disturbance. Each exclusion shall be specific to the structure, as none of the structures are the same. All exclusions shall involve the installation of one-way doors or flaps during the non-breeding season that allow the bats to leave and not re-enter the structure. The Bat Exclusion Plan shall be subject to review and approval by the Placer County Community Development Resource Agency and shall be implemented prior to the start of construction.*			
5-3	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.	*Placer County Conservation Program Sites* *5-3(a)* *If the rezone site is covered under the PCCP and includes Valley oak riparian woodland and/or willow riparian that would be avoided, then PCCP Community Condition 2.1 shall be implemented, as follows:* *PCCP Community Condition 2.1: The project shall not modify any area within a buffer that extends 50 feet outward from*	Placer County Community Development Resource Agency Placer Conservation Authority	If the proposed project is implemented while the PCCP is in the Initial Survey Phase, then prior to construction or grading activities	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		the outermost bounds of the riparian vegetation. The improvement or grading plans shall show the location of the riverine/riparian buffer.			
		5-3(b) *If the rezone site is covered under the PCCP and includes Valley oak riparian woodland and/or willow riparian that would not be avoided, then PCCP Community Condition 2.2 shall be implemented, as follows:* *PCCP Community Condition 2.2: Prior to land conversion authorization, the applicant shall coordinate with the PCA to determine which In-Stream and Stream System Best Management Practices (BMPs) from Table 7-1 of the User's Guide apply to the proposed project. The applicant shall identify the applicable BMPs on the project's improvement or grading plans. The selected BMPs will be incorporated into the project's Land Conversion Authorization letter.* *Prior to land conversion authorization approval, the unavoidable effects to riverine and/or riparian habitat or their buffers shall be mitigated through payment of special habitat fees. The fees to be paid shall be those in effect at the time of land conversion authorization.*	Placer County Community Development Resource Agency Placer Conservation Authority	If the rezone site is covered under the PCCP and includes Valley oak riparian woodland and/or willow riparian that would not be avoided, then prior to land conversion authorization	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		5-3(c) *If development of a rezone site would involve impacts to a drainage or to riparian habitat, then the applicant shall apply for a Section 1600 Lake or Streambed Alteration Agreement (LSAA) from CDFW prior to County approval of any permit authorizing construction. The applicant shall comply with any terms and conditions contained within the final LSAA for the project.* *Minimization and avoidance measures shall be developed during the regulatory process and may include, but not be limited to, preconstruction species surveys and reporting, protective fencing around avoided biological resources, worker environmental awareness training, seeding disturbed areas adjacent to open space areas with native seed, and installation of project-specific storm water BMPs. Mitigation for impacts to riparian habitat, including Valley oak riparian woodland and willow riparian, may include, but not be limited to, restoration or enhancement of resources on- or off-site, purchase of habitat credits from an agency-approved mitigation/conservation bank, working with a local land trust to preserve land, or any other method acceptable to CDFW. Mitigation shall result in no net loss of riparian habitat.*	Placer County Community Development Resource Agency CDFW	If development of a rezone site would involve impacts to a drainage or to riparian habitat, then prior to County approval of any permit authorizing construction or grading	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Sites Not Covered under the Placer County Conservation Program *5-3(d) If development of a rezone site would involve impacts to Valley oak riparian woodland and/or willow riparian, implement Mitigation Measure 5-3(c).*	See Mitigation Measure 5-3(c)	See Mitigation Measure 5-3(c)	
5-4	Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	*5-4(a) If aquatic resources are found on a rezone site during implementation of Mitigation Measure 5-1(a), all aquatic resources shall be mapped with a global positioning system (GPS) unit capable of sub-meter accuracy, and associated three-parameter data shall be collected in accordance with the applicable USACE regional supplement. An Aquatic Resources Delineation report shall be prepared in accordance with the USACE Sacramento District's Minimum Standards for Acceptance of Preliminary Aquatic Resources Delineations and submitted to the USACE for verification. Verification of the extent of aquatic resources shall be received prior to County approval of any permit authorizing construction on a rezone site with potential aquatic resources.* *Placer County Conservation Program Sites* *5-4(b) If aquatic resources occur within a rezone site covered under the PCCP, and aquatic resource impacts are proposed, then prior to County approval of any permit authorizing construction, the applicant shall apply for coverage under the County Aquatic Resources Program (CARP) either through the PCCP application process or directly with*	Placer County Community Development Resource Agency USACE Placer County Community Development Resource Agency	Prior to County approval of any permit authorizing construction or grading on a rezone site with potential aquatic resources If aquatic resources occur within a rezone site covered under the PCCP, then prior to County approval of any permit authorizing construction or	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		the USACE (depending on impact acreage) using avoidance and minimization guidance from the CARP, a component of the PCCP. *The applicant shall submit an application to the RWQCB for Waste Discharge Requirements (WDRs) and/or a Water Quality Certification of the PCCP permit (depending on the limit of federal jurisdiction to wetlands and waters of the U.S. in place at the time), and adhere to the certification conditions.*	Placer Conservation Authority	grading	
		5-4(c) *If development of a rezone site covered under the PCCP has the potential to impact Aquatic Resources of Placer County, the following CARP Authorization Conditions shall be implemented, as follows:* • *All work within the Plan Area that impacts Aquatic Resources of Placer County shall be completed according to the plans and documents included in the CARP application, Water Quality Certification, and, if applicable, WDRs. All changes to those plans shall be reported to Placer County. Minor changes may require an amendment to the CARP Authorization, Water Quality Certification, and, if applicable, WDRs. Substantial changes may render the authorization, Water*	Placer County Community Development Resource Agency	If development of a rezone site covered under the PCCP has the potential to impact Aquatic Resources of Placer County, then prior to commencement of construction or grading	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Quality Certification, and, if applicable, WDRs, void, and a new application may be required. • *A copy of the CARP conditions and Water Quality Certification and WDRs shall be given to individuals responsible for activities on the site. Site personnel, (employees, contractors, and subcontractors) shall be adequately informed and trained to implement all permit, Water Quality Certification, and WDR conditions and shall have a copy of all permits available on-site at all times for review by site personnel and agencies.* • *Any construction within the Stream System shall be implemented in a way to avoid and minimize impacts to vegetation outside the construction area. All preserved wetlands, other Aquatic Resources of Placer County, and the Stream Zone shall be protected with bright construction fencing. Temporary fencing shall be removed immediately upon completion of the project.* • *Before beginning construction, the project Applicant must have a valid CARP authorization or waiver notice. In order to obtain a permit, the Applicant must pay all mitigation fees or purchase*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		appropriate credits from an agency-approved mitigation bank. • *All deviations from plans and documents provided with the Application and approved by Placer County CDRA must be reported to Placer County CDRA immediately.* • *Erosion control measures shall be specified as part of the CARP application, and the application shall not be complete without them. All erosion control specified in the permit application shall be in place and functional before the beginning of the rainy season and shall remain in place until the end of the season. Site supervisors shall be aware of weather forecasts year-round and shall be prepared to establish erosion control on short notice for unusual rain events. Erosion control features shall be inspected and maintained after each rainfall period. Maintenance includes, but is not limited to, removal of accumulated silt and the replacement of damaged barriers and other features.* • *All work in aquatic resources within the Stream System shall be restricted to periods of low flow and dry weather between April 15 and October 15, unless otherwise permitted by Placer County CDRA*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		and approved by the appropriate State and federal regulatory agency. Work within aquatic resources in the Stream System outside of the specified periods may be permitted under some circumstances. The Applicant must provide Placer County CDRA with the following information: a) the extent of work already completed; b) specific details about the work yet to be completed; and c) an estimate of the time needed to complete the work in the Stream System. • *Following work in a stream channel, the low flow channel shall be returned to its natural state to the extent possible. The shape and gradient of the streambed shall be restored to the same gradient that existed before the work to the extent possible.* • *Work shall not disturb active bird nests until young birds have fledged. To avoid impacts to nesting birds, any disturbance shall occur between September 1 and February 1 prior to the nesting season. Tree removal, earthmoving or other disturbance at other times is at Placer County CDRA's discretion and will require surveys by a qualified biologist to determine*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		the absence of nesting birds prior to the activity. • *All trees marked for removal within the Stream System must be shown on maps included with the Application. Native trees over five inches diameter at breast height (DBH) shall not be removed without the consent of Placer County CDRA.* • *Except for site preparation for the installation and removal of dewatering structures, no excavation is allowed in flowing streams unless dredging WDRs are issued by the RWQCB. Detailed plans for dewatering must be part of the Application.* • *Temporary crossings as described in the Application shall be installed no earlier than April 15 and shall be removed no later than October 15, unless otherwise permitted by Placer County CDRA and approved by the appropriate State and federal regulatory agency. This work window could be modified at the discretion of Placer County and the CDFW.* • *No vehicles other than necessary earth-moving and construction equipment shall be allowed within the Stream System after the section of stream where work is*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		performed is dewatered. The equipment and vehicles used in the Stream System shall be described in the Application. • *Staging areas for equipment, materials, fuels, lubricants, and solvents shall be located outside the stream channel and banks and away from all preserved aquatic resources. All stationary equipment operated within the Stream System must be positioned over drip-pans. Equipment entering the Stream System must be inspected daily for leaks that could introduce deleterious materials into aquatic resources. All discharges, unintentional or otherwise, shall be reported immediately to Placer County CDRA. Placer County CDRA shall then immediately notify the appropriate state and federal agencies.* • *Cement, concrete, washings, asphalt, paint, coating materials, oil, other petroleum products, and other materials that could be hazardous to aquatic life shall be prevented from reaching streams, lakes, or other water bodies. These materials shall be placed a minimum of 50 feet away from aquatic environments. All discharges, unintentional or*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		otherwise, shall be reported immediately to Placer County CDRA. Placer County CDRA shall then immediately notify the appropriate state and federal agencies. • *During construction, no litter or construction debris shall be dumped into water bodies or other aquatic resources; nor shall it be placed in a location where it might be moved by wind or water into aquatic resources. All construction debris shall be removed from the site upon completion of the project.* • *Only herbicides registered with the California Department of Pesticide Regulation shall be used in streams, ponds, and lakes, and shall be applied in accordance with label instructions. A list of all pesticides that may be used in the project area shall be submitted to Placer County CDRA before use. The PCCP does not authorize the use of herbicides; herbicide application is not a Covered Activity.* • *Placer County CDRA shall be notified immediately if threatened or endangered species that are not Covered Species are discovered during construction activities. Placer County CDRA shall suspend*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		work and notify the USFWS, NMFS, and the CDFW for guidance. • *Wildlife entering the construction site shall be allowed to leave the area unharmed or shall be flushed or herded humanely in a safe direction away from the site.* • *All pipe sections shall be capped or inspected for wildlife before being placed in a trench. Pipes within a trench shall be capped at the end of each day to prevent entry by wildlife, except for those pipes that are being used to divert stream flow.* • *At the end of each workday, all open trenches will be provided with a ramp of dirt or wood to allow trapped animals to escape.* • *If human remains or cultural artifacts are discovered during construction, the Applicant shall stop work in the area and notify Placer County CDRA immediately. Work will not continue in the area until the County coroner and a qualified archaeologist have evaluated the remains, conducted a survey, prepared an assessment, and required consultations are completed.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		5-4(d) *If development of a rezone site covered under the PCCP disturbs one acre or more of soil or is part of a larger common plan of development that disturbs a total of one or more acre, then PCCP General Condition 1 shall be implemented, as follows:* *PCCP General Condition 1: Prior to Improvement Plan approval, the project shall obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ); including requirements to develop a project-based Storm Water Pollution Prevention Plan (SWPPP); and applicable NPDES program requirements as implemented by the County. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation.* *The project shall comply with the West Placer Storm Water Quality Design Manual (Design Manual).* *The project shall implement the following BMPs. This list shall be included on the Notes page of the improvement/grading plans and shall be shown on the plans:*	Placer County Community Development Resource Agency Placer Conservation Authority	If development of a rezone site covered under the PCCP disturbs one acre or more of soil or is part of a larger common plan of development that disturbs a total of one or more acre, then, prior to approval of improvement or early grading plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		1. *When possible, vehicles and equipment will be parked on pavement, existing roads, and previously disturbed areas. When vehicle parking areas are to be established as a temporary facility, the site will be recovered to pre-project or ecologically improved conditions within one year of start of groundbreaking to ensure effects are temporary (refer to Section 6.3.1.4, General Condition 4, Temporary Effects, for the process to demonstrate temporary effects).* 2. *Trash generated by Covered Activities will be promptly and properly removed from the site.* 3. *Appropriate erosion control measures (e.g., fiber rolls, filter fences, vegetative buffer strips) will be used on site to reduce siltation and runoff of contaminants into avoided wetlands, ponds, streams, or riparian vegetation.* a. *Erosion control measures will be of material that will not entrap wildlife (i.e., no plastic monofilament). Erosion control blankets will be used as a last resort because of their tendency to biodegrade slowly and trap reptiles and amphibians.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		b. Erosion control measures will be placed between the area of disturbance and any avoided aquatic feature, within an area identified with highly visible markers (e.g., construction and erosion-control fencing, flagging, silt barriers) prior to commencement of construction activities. Such identification will be properly maintained until construction is completed and the soils have been stabilized. *c. Fiber rolls used for erosion control will be certified by the California Department of Food and Agriculture or any agency that is a successor or receives delegated authority during the permit term as weed free.* *d. Seed mixtures applied for erosion control will not contain California Invasive Plant Council–designated invasive species (http://www.cal-ipc.org/paf/) but will be composed of native*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		species appropriate for the site or sterile non-native species. If sterile non-native species are used for temporary erosion control, native seed mixtures must be used in subsequent treatments to provide long-term erosion control and slow colonization by invasive non-natives. *4. If the runoff from the development will flow within 100 feet of a wetland or pond, vegetated storm water filtration features, such as rain gardens, grass swales, tree box filters, infiltration basins, or similar LID features to capture and treat flows, shall be installed consistent with local programs and ordinances.*			
		5-4(e) If a rezone site covered under the PCCP has vernal pool wetlands in the ground-disturbance areas or in the immediate watershed of the ground-disturbance areas that would be avoided, then PCCP Community Condition 1.1 shall be implemented, as follows: *<u>PCCP Community Condition 1.1</u>: After receipt of a PCCP Certificate of Authorization and prior to construction, the project shall retain a qualified*	Placer County Community Development Resource Agency Placer Conservation Authority	If a rezone site covered under the PCCP has vernal pool wetlands in the ground-disturbance areas or in the immediate watershed of the ground-disturbance areas that would be avoided, then after receipt of a PCCP	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		professional to temporarily stake vernal pool constituent habitat and immediate watersheds that will be avoided to ensure construction equipment and personnel completely avoid these features. A note to this effect shall be shown on the projects (improvement plans or grading plans) and the location of temporary fencing demonstrated on the plans. Once installed, the applicant shall notify the PCA and the County of the temporary fencing and provide photographs as evidence of the installation. The fencing shall remain in place for the duration of ground-disturbing activities. *If the project has unavoidable effects to vernal pool wetlands, then prior to land conversion authorization approval, the unavoidable effects to vernal pool wetlands or their buffers shall be mitigated through payment of special habitat fees. The fees to be paid shall be that in effect at the time of land conversion authorization issuance.*		Certificate of Authorization and prior to construction or grading	
		5-4(f) *If a rezone site covered under the PCCP has non-vernal pool wetlands, then PCCP Community Condition 1.2 shall be implemented, as follows:* *<u>PCCP Community Condition 1.2</u>: If the non-vernal pool wetlands will be avoided, then after receiving a PCCP Certificate of Authorization and prior to construction,*	Placer County Community Development Resource Agency Placer Conservation Authority	If a rezone site covered under the PCCP has non-vernal pool wetlands, then after receiving a PCCP Certificate of Authorization and prior to construction or grading or prior to	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		the project shall retain a qualified professional to temporarily stake non-vernal pool wetlands and their buffer that will be avoided to ensure construction equipment and personnel completely avoid these features. A note to this effect shall be shown on the project plans (improvement plans or grading plans) and the location of temporary fencing demonstrated on the plans. Once installed, the applicant shall notify the PCA and the County of the temporary fencing and provide photographs as evidence of the installation. The fencing shall remain in place for the duration of ground-disturbing activities. *If the project has unavoidable effects to non-vernal pool wetlands, then prior to land conversion authorization approval, the unavoidable effects to non-vernal pool wetlands or their buffers shall be mitigated through payment of special habitat fees. The fees to be paid shall be that in effect at the time of land conversion authorization issuance.*		land conversion authorization approval	
		5-4(g) *If a rezone site covered under the PCCP would have temporary impacts on non-vernal pool wetlands or their buffers, then PCCP Community Condition 1.3 shall be implemented, as follows:*	Placer County Community Development Resource Agency	If a rezone site covered under the PCCP would have temporary impacts on non-vernal pool wetlands or their buffers, then prior to	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		PCCP Community Condition 1.3: Prior to land conversion authorization, the project shall demonstrate compliance with the following measures. These measures shall be included on the improvement or grading plans. 1. *Personnel conducting ground-disturbing activities in or around other wetlands must be trained by a qualified biologist in these minimization measures and the permit obligations of project applicants working under the Plan.* 2. *Construction and maintenance vehicles or equipment cannot be refueled within the wetland or its buffer unless a bermed and lined refueling area is constructed and hazardous material absorbent pads are available in the event of a spill.* 3. *No equipment will be present in the wetted portion of the aquatic feature. Equipment may only enter the area when the aquatic feature is dry and there is no forecasted rain within 72 hours. Vehicles will be checked for leaks prior to entering or traveling around the aquatic feature.* 4. *All organic matter must be removed from nets, traps, boots, vehicle tires, and all other surfaces that have come into contact with aquatic*	Placer Conservation Authority	land conversion authorization	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		features, or potentially contaminated sediments. Items shall be rinsed with clean water before leaving each study site (U.S. Fish and Wildlife Service 2005). *5. Measures to minimize the spread of disease and non-native species shall be implemented based on current Wildlife Agency protocols (e.g., Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog, Appendix B, Recommended Equipment Decontamination Procedures [U.S. Fish and Wildlife Service 2005]) and other best available science.* *6. Used cleaning materials (e.g., liquids) must be disposed of safely and, if necessary, taken off site for proper disposal. Used disposable gloves shall be retained for safe disposal in sealed bags (U.S. Fish and Wildlife Service 2005).* *7. Native vegetation (shrubs and small trees) must be planted between other wetlands and the development such that the line of sight between other wetlands and the development is shielded. This measure is only required when the reviewing Permittee deems it necessary to shield other wetlands from adjacent development or to*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		avoid direct or indirect effects from the adjacent development (e.g., trespass). *8. The reviewing Permittee will make a determination if fencing shall be required on a case-by-case basis. If needed, the type of fencing will match the activity and impact types. For example, projects that have the potential to cause erosion will require erosion-control barriers, and projects that may bring more household pets to a site must have permanent fencing to exclude pets. The temporal requirements for fencing also depend on the activity and impact type. For example, fencing to minimize permanent effects will be permanent, and fencing to minimize short-term effects will be removed after the activity is completed. Permanent fencing will be installed after grading or other construction activities in the area have been completed. If installed, a party responsible for maintenance will be identified prior to construction.*			
		5-4(h) If a rezone site covered under the PCCP would impact vernal pool constituent habitat, then PCCP Community Condition 1.4 shall be implemented, as follows:	Placer County Community Development Resource Agency	If a rezone site covered under the PCCP would impact vernal pool constituent habitat,	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			PCCP Community Condition 1.4: Prior to ground disturbance, the applicant shall schedule grading and construction in coordination with the PCA to provide the PCA the opportunity to salvage topsoil from the vernal pool wetland if they choose to do so. The applicant shall notify the PCA of their construction schedule within 30 days of the construction start date to allow the PCA the opportunity to salvage soils while the pools are completely dry (generally July through September) and the PCA must make salvage plans sufficiently far in advance so as to not unreasonably impair construction.	Placer Conservation Authority	then prior to ground disturbance	
		5-4(i)	*PCCP Stream System Condition 1: If development of a rezone site covered under the PCCP does not propose development activities within a Stream System, then PCCP Community Condition 2.1 shall be implemented, as detailed in Mitigation Measure 5-3(a).*	See Mitigation Measure 5-3(a)	See Mitigation Measure 5-3(a)	
		5-4(j)	*If the development footprint of a rezone site covered under the PCCP would directly impact the Stream System, then PCCP Stream System Condition 2 shall be implemented, as follows:* *PCCP Stream System Condition 2: The area of Stream System encroachment is subject to the Stream System*	Placer County Community Development Resource Agency Placer Conservation Authority	If the development footprint of a rezone site covered under the PCCP would directly impact the Stream System, then prior to the issuance of any permit or authorization of	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Encroachment Special Habitats Fee as described in Chapter 5 of the PCCP User's Guide. Fees must be paid prior to the issuance of any permit or authorization that results in ground disturbance within the Stream System. *Sites Not Covered under the Placer County Conservation Program* *5-4(k) Implement Mitigation Measure 5-4(a).* *5-4(l) If aquatic resources occur within a rezone site not covered by the PCCP and aquatic resource impacts are proposed, then prior to County approval of any permit authorizing construction, the project applicant shall apply for a Section 404 permit from USACE, if waters of the U.S. will be impacted. Waters that will be permanently impacted shall be replaced or rehabilitated on a "no-net-loss" basis. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods acceptable to the USACE.* *The applicant shall apply for WDRs and/or a Water Quality Certification from the RWQCB (depending on the limit of federal jurisdiction to wetlands and waters of the U.S. in place at the time) and adhere to the certification conditions.*	See Mitigation Measure 5-4(a) Placer County Community Development Resource Agency USACE RWQCB	ground disturbance See Mitigation Measure 5-4(a) If aquatic resources occur within a rezone site not covered by the PCCP and aquatic resource impacts are proposed, then prior to County approval of any permit authorizing construction	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
5-6	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or have a substantial adverse effect on the environment by converting oak woodlands or impacting individual trees.	*Placer County Conservation Program Sites* *5-6(a) If a rezone site covered under the PCCP occurs adjacent to PCCP reserves, mitigation and conservation banks, or any other property protected by an in-perpetuity conservation mechanism for natural lands management, then PCCP General Condition 2 shall be implemented, as follows:* *PCCP General Condition 2: The project shall minimize effects on adjacent conservation lands through implementation of the following design requirements:* *1. Signage will be posted to notify of any usage restrictions and to educate the public on the sensitivity of the area and usage restrictions.* *2. Fencing will be installed at the boundary between developed areas and reserves to prevent illegal access by people and pets, unless the conditions on the reserve make trespass unlikely (i.e., surrounded by canals that are difficult to cross). Fences will be suitable to the conditions in the adjacent reserve. The type of fence required will be at the discretion of the County or City, as permitted by County and City codes. Fences will have limited gates and be designed*	Placer County Community Development Resource Agency Placer Conservation Authority	Prior to approval of improvement plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		with consideration to not allowing movement of people and their pets. Access will be limited to maintenance and monitoring activities unless a habitat management plan specifies otherwise. 3. *Natural or artificial barriers or other access restrictions may be installed around development to protect sensitive land-cover types and Covered Species in the reserves. If used, barriers will be designed so they are appropriate for site conditions and the resources being protected. Some barriers should keep domestic pets outside the reserve, other barriers should keep Covered Species inside the reserve. Before installation of a barrier, consideration shall be given to freedom of movement by Covered Species. If the barrier would prevent movement, or if the barrier would encourage species to use other, less-favorable crossings, alternative solutions shall be considered.* 4. *Roads constructed adjacent to reserves will be fenced to restrict unauthorized public access. Through the conditional approval process, the Permittee will only approve fencing that is appropriate*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		(e.g., chain link, post and cable, barbwire) to allow movement of wildlife between reserves. 5. *Development will be designed to minimize the length of the shared boundary between development and the reserves (i.e., minimize the urban edge, perimeter).* 6. *Incorporation of high-intensity lighting (e.g., floodlights used for recreational facilities and commercial parking lots) into site improvement standards near reserves will be avoided. Low-glare, no-glare, or shielded lighting will be installed in developed areas adjacent to reserves to minimize artificial lighting of reserve lands at night. The height and intensity of lights shall be kept to a minimum. Resources providing technical support include publications of the Illuminating Engineering Society of North America and its Lighting Handbook, Reference & Application, Ninth Edition, and Recommended Practices. The intent of this avoidance and minimization measure is to design a lighting system, where determined necessary, that maintains public safety and security in the project area while curtailing the degradation of the nighttime visual*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		environment on the reserve property by limiting nighttime light radiation and/or light spill. *7. Public facilities, such as ballparks and fields that require high-intensity night lighting (i.e., floodlights), will be sited at least 0.5 mile from the reserve boundary to minimize light pollution. Facilities may be sited closer to the Reserve System if the PCA determines the lighting system will not be intrusive to wildlife within the Reserve System (e.g., hills block the lighting).* *8. For any landscaping adjacent to reserve properties, non-invasive plants will be required, and the use of native plants will be highly encouraged, consistent with County landscape design guidelines (Placer County 2013) or similar standards for the City of Lincoln.* *Any of the above design requirements, or similar requirements developed over time, that are incorporated into projects will be located within the development footprint. These project features will be maintained by the property owners. Conditions of approval on projects are monitored by County or City staff during the construction and development phase and are enforced over time through the efforts*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			of professional land development staff familiar with the project or a code enforcement division. If projects are found to be out of compliance, standard remedial actions would be applied and may include code enforcement, use of securities, revocation or modification of entitlement. Violations will be reported to the PCA, Wildlife Agencies, and applicable local jurisdiction for potential enforcement.			
		5-6(b)	*If development of a rezone site covered under the PCCP would result in permanent natural land cover conversion from a natural or semi-natural land cover to an urban, suburban, rural residential, or other non-natural condition, then PCCP General Condition 3 shall be implemented, as follows:* *PCCP General Condition 3: The project shall pay fees according to the PCCP Land Conversion Fee Schedule. The fees to be paid shall be those in effect at the time of ground disturbance authorization for each project step and shall be the per acre fee based on the amount of land disturbance resulting from the activity and per dwelling fee based on the number of residential buildings (not individual units within buildings). An application for PCCP Authorization shall accompany the permit application for each project step. If the*	Placer County Community Development Resource Agency Placer Conservation Authority	If development of a rezone site covered under the PCCP would result in permanent natural land cover conversion from a natural or semi-natural land cover to an urban, suburban, rural residential, or other non-natural condition, then prior to issuance of a land conversion authorization that allows ground disturbance of a special habitat	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		applicant will not be developing the future lots, the subsequent homebuilder shall pay the remaining fee obligation based on the total applicable fee minus a credit for any prior fee payment apportioned equally among all final lots. In addition to land conversion, if the project would result in permanent and/or temporary direct effects to Special Habitats, then the special habitat fee obligation including temporary effect fees shall be paid prior to issuance of a land conversion authorization that allows ground disturbance of a special habitat. *Refer to pages 66-67 of the PCCP User's Guide to determine whether the project's Land Conversion fees will be applied on a per acre basis only, or through both a per dwelling unit and per acre basis.*			
		5-6(c) *If development of a rezone site covered under the PCCP would temporarily affect natural land cover that would be returned to pre-project conditions within one year of commencement of ground disturbance at the site, then PCCP General Condition 4 shall be implemented, as follows:* *<u>PCCP General Condition 4</u>: The applicant shall restore all temporarily disturbed areas and, one year after project groundbreaking, provide the County with a written assessment of how the*	Placer County Community Development Resource Agency Placer Conservation Authority	If development of a rezone site covered under the PCCP would temporarily affect natural land cover that would be returned to pre-project conditions within one year of commencement of ground disturbance at the site, then one	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		performance standards were met. Prior to issuance of land conversion authorization, the project shall pay a temporary impact fee based on the acres of temporary impact. The fee to be paid shall be that in effect at the time of land conversion authorization issuance. If it is determined by the County or the Program Biologist that the effects remain one year after groundbreaking activities have commenced, the effects shall be considered permanent and the County Project Lead shall reassess fees based on those effects. *If the project will develop and implement its own wetland restoration or stream enhancement project in lieu of all or a portion of the temporary special habitat fee, then the applicant shall submit a restoration or enhancement plan to the PCA and any applicable state or federal agency. The restoration or enhancement plan shall provide adequate assurances that it will construct, manage, and monitor the mitigation site in accordance with the requirements of the HCP/NCCP, including any remediation necessary to meet success criteria, and construction activities associated with the restoration or creation of the wetlands or other water features are initiated concurrent with the initiation of ground-disturbing activities for the Covered Activity for which the fee*		year after project groundbreaking	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		credit is requested. For Covered Activities, the County or City, as applicable, must require such assurances as an enforceable condition of project approval. For Covered Activities implemented by a Permittee, the Permittee must enter into an agreement with the PCA to provide this assurance. After the restoration or creation is complete and all success criteria are met, and necessary funding is provided, the PCA will assume management and monitoring responsibility for the restoration or creation site as part of the Reserve System.			
		5-6(d) *If Valley oak woodland occurs within or adjacent to a rezone site covered under the PCCP, then PCCP Community Condition 3 shall be implemented, as follows:* *<u>PCCP Community Condition 3</u>: If the project avoids Valley oak woodland, and does not propose development activities within 50 feet of the canopy of any Valley oak woodland stand greater than one acre, then no land conversion fees will be assessed within the avoided area. Irrigation shall be prohibited in and around the valley oak woodland. Alteration of on-site hydrology (including from on-site sewage disposal system installation) shall be prohibited to ensure the Valley oak*	Placer County Community Development Resource Agency Placer Conservation Authority	If Valley oak woodland occurs within or adjacent to a rezone site covered under the PCCP, then prior to any grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		woodland receives no additional water than pre-project conditions. The Landscape Plans (if applicable) shall demonstrate that irrigation is not placed within the critical root zone of protected trees. *Unavoidable effects to individual Valley oak trees or Valley oak woodlands or their 50-foot buffers shall pay the Plan land conversion fee by quantifying impacts as described in Effects on Valley Oak Woodlands of the PCCP User's Guide.* *Sites Not Covered under the Placer County Conservation Program* *5-6(e)* *<u>Individual Tree Mitigation.</u> If any native trees (native oak trees five inches diameter at breast height [DBH] or greater and all other single-trunk native trees six inches DBH or greater as defined above in Chapter 19, Article 50 of the Placer County Code) occur within a non-PCCP rezone site, the project applicant shall obtain a Tree Permit from the Placer County Planning Services Division, prior to improvement plan approval. The Planning Services Division shall review the Tree Permit application, as well as the final site improvement plans and determine the precise mitigation requirement at that time. The fee shall be paid into the Placer County Tree Preservation Fund at $125 per DBH*	Placer County Planning Services Division	Prior to approval of improvement or early grading plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		removed or impacted (or the applicable fee at that time). *Efforts shall be made to save trees where feasible. This may include the use of retaining walls, planter islands, pavers, or other techniques commonly associated with tree preservation. The improvement plans shall include a note and show placement of temporary construction fencing around trees to be saved: The project applicant shall install a four-foot-tall, brightly colored (typically orange), synthetic mesh material fence (or an equivalent approved by the Development Review Committee) at the following locations prior to any construction equipment being moved on-site or any construction activities taking place: at the limits of construction; outside the Protected Zone of all Protected Trees; within 50 feet of any grading, road improvements, underground utilities, or other development activity; or as otherwise shown on the site plan.* *Development of the project, including grading, shall not be allowed until this requirement is satisfied. Any encroachment within the foregoing areas, including Protected Zones of trees to be saved, must first be approved by the County. Temporary fencing shall not be altered during construction without written*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		approval of the County. Grading, clearing, storage of equipment or machinery, etc., shall not occur until a representative of the County has inspected and approved all temporary construction fencing.			
		5-6(f) If a non-PCCP rezone site contains tree crown canopy coverage of 10 percent per acre or greater, the dominant tree species are native California oaks, and the oak woodland is at least two acres, the project applicant shall obtain a Tree Permit from the Placer County Planning Services Division prior to improvement plan approval that could impact native trees and comply with all requirements of the Tree Permit. The Planning Services Division shall review the Tree Permit application as well as the final site improvement plans and determine the precise mitigation requirement at that time. To support the approval process, an exhibit shall be submitted showing the extent of the proposed activity within oak woodlands (as defined by the Interim Guidelines for Evaluating Development Impacts on Oak Woodland [Interim Guidelines]), and the resulting acreage of impact to oak woodlands. If that impact acreage is one acre or greater, the project applicant may choose to mitigate for oak woodlands as follows:	Placer County Planning Services Division	Prior to approval of improvement or early grading plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		• *Compensatory mitigation shall occur off-site and may consist of one of the following, based on the acreage of oak woodland impacted:* o *Submit payment of fees for oak woodland conservation at a 2:1 ratio consistent with Chapter 19.50 of the Placer County Code: Woodland Conservation. The fees shall be calculated based upon the current market value of similar oak woodland acreage preservation and an endowment to maintain the land in perpetuity. The fee is currently $23,500 per acre of canopy cover impact (December 2023), but as stated above, the applicable fee will be market value at the time of impact/payment.* o *Purchase off-site conservation easements at a location approved by Placer County to mitigate the loss of oak woodlands at a 2:1 ratio.* o *Provide for a combination of payment to the Tree Preservation Fund and*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			creation of an off-site Oak Preservation Easement. *Removal of significant trees (greater than 24 inches DBH or clumps greater than 72 inches in circumference measured at ground level) within oak woodlands requires additional mitigation on a per-inch DBH removed or impacted ($125 per DBH inch or the applicable fee at that time).*			
5.7	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or have a substantial adverse effect on the environment by converting oak woodlands or impacting individual trees.	*5-7(a)*	*Implement Mitigation Measures 5-2(d), 5-2(h), 5-2(j), 5-2(s), 5-2(u), 5-2(x), 5-3(a), 5-3(b), 5-3(c), 5-4(a), 5-4(b), 5-4(c), 5-4(d), 5-4(e), 5-4(f), 5-4(g), 5-4(h), 5-4(i), 5-4(j), 5-6(a), 5-6(b), and 5-6(d).*	See Mitigation Measures 5-2(d), *5-2(h), 5-2(j), 5-2(s), 5-2(u), 5-2(x), 5-3(a), 5-3(b), 5-3(c), 5-4(a), 5-4(b), 5-4(c), 5-4(d), 5-4(e), 5-4(f), 5-4(g), 5-4(h), 5-4(i), 5-4(j), 5-6(a), 5-6(b), and 5-6(d)*	See Mitigation Measures 5-2(d), *5-2(h), 5-2(j), 5-2(s), 5-2(u), 5-2(x), 5-3(a), 5-3(b), 5-3(c), 5-4(a), 5-4(b), 5-4(c), 5-4(d), 5-4(e), 5-4(f), 5-4(g), 5-4(h), 5-4(i), 5-4(j), 5-6(a), 5-6(b), and 5-6(d)*	
		5-7(b)	*If development of a rezone site covered under the PCCP requires any PCCP Avoidance and Minimization Measures (AMMs) during construction, then PCCP General Condition 5 shall be implemented, as follows:* *<u>PCCP General Condition 5</u>: Prior to initiation of construction activities, all*	Placer County Community Development Resource Agency Placer Conservation Authority	Prior to commencement of construction or grading	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			project construction personnel shall participate in a worker environmental training program that will educate workers regarding the Covered Species and their habitats, the need to avoid impacts, state and federal protection, and the legal implications of violating environmental laws and regulations. At a minimum this training may be accomplished through tailgate presentations at the project site and the distribution of informational brochures, with descriptions of sensitive biological resources and regulatory protections, to construction personnel prior to initiation of construction work.			
6. Cultural Resources						
6-1	Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5.	*6-1(a)*	*If properties containing structures are located in parcels selected for development and have not been formally evaluated for the NRHP or CRHR, a pedestrian or windshield survey shall be carried out by a qualified architectural historian, and, if needed, a formal evaluation applying the criteria of the NRHP and the CRHR shall be prepared to determine if they are significant historic resources. Results of the evaluations shall be submitted to the Placer County Community Development Resource Agency and Placer County Museums for review prior to approval of any permits authorizing construction. If resources are determined not to be eligible for listing on the NRHP or CRHR, further mitigation is*	Placer County Community Development Resource Agency	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		not required. If resources are determined to be eligible, such resources shall be avoided. However, if avoidance is not feasible, Mitigation Measure 6-1(b) shall be implemented.			
		6-1(b) Prior to the demolition of any existing historic buildings within the rezone sites, the following measures shall be implemented: *a) Retain a qualified architectural historian, as approved by the Placer County Community Development Resource Agency, to prepare a "Historic Documentation Report." The report shall include current photographs of each building displaying each elevation, architectural details or features, and overview of the buildings, together with a textual description of the building along with additional history of the building, its principal architect or architects, and its original occupants. The photo-documentation shall be done in accordance with Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) guidelines, which shall include archival quality negatives and prints. The final Report shall be deposited with the Placer County Community*	Placer County Community Development Resource Agency	Prior to demolition or alteration of any existing historic buildings	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			Development Resource Agency, the Department of Museums, and the State Office of Historic Preservation, as well as other appropriate organizations and agencies as identified by the Placer County Community Development Resource Agency.			
6-2	Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines, Section 15064.5.	*6-2(a)*	*Prior to initiation of ground-disturbing activities on any of the 23 rezone sites identified as having precontact and/or historic archaeological resources, a qualified archaeologist shall conduct a short awareness training session for all construction workers and supervisory personnel. The session shall explain the importance of, and legal basis for, the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event cultural resources or human remains/burials are uncovered during construction activities, including work curtailment or redirection, and to immediately contact their supervisor and the archaeological monitor. The worker education session shall include visuals of artifacts (prehistoric and historic) that might be found in the project vicinity and take place on the construction site immediately prior to the start of construction. All ground-disturbing equipment operators shall be required to receive the training and sign a form that*	Placer County Community Development Resource Agency	Prior to initiation of ground-disturbing activities	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		acknowledges receipt of the training. This training may be conducted concurrently with the tribal cultural resource awareness training required by Mitigation Measure 9-1(a) included in Chapter 9, Tribal Cultural Resources, of this EIR. The signed form shall be submitted to the Placer County Community Development Resource Agency.			
		6-2(b) If a residential development application is submitted for any of the 17 parcels that have not previously undergone a cultural resource survey are selected for the proposed project, those parcels shall be subject to a field survey by a professional archaeologist prior to issuance of grading permits and/or improvement plans. The results of the survey will determine what course of action is needed, if any, in terms of avoiding significant cultural resources in the subject parcels, subject to review and approval by the Placer County Community Development Resource Agency. If precontact and/or historic archaeological resources are detected, Mitigation Measure 6-2(c) shall be implemented.	Placer County Community Development Resource Agency	Prior to issuance of grading permits and/or improvement plans	
		6-2(c) In the event that cultural resources are inadvertently discovered during project activities, work in the area must be halted within a 100-foot radius of the find and a qualified archaeologist (pursuant to the	Placer County Community Development Resource Agency	In the event that cultural resources are inadvertently discovered during project activities	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Standards at 36 CFR Part 61) shall be notified immediately to evaluate the resource(s) encountered. If the resource is cultural/Native American in origin, a representative from the culturally affiliated Tribe will be notified to participate in the evaluation. Construction activities may continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation, may be warranted and would be discussed in consultation with the project applicant and the relevant regulatory agencies (Placer County, State Historic Preservation Officer [SHPO], or any other relevant regulatory agency, and the culturally affiliated Tribe). This mitigation measure shall be included as a note on the grading/improvement plans.	SHPO		
6-3	Disturb any human remains, including those interred outside of dedicated cemeteries.	*6-3* *The following language shall be noted on Improvement Plans for any future residential project located on a rezone site, subject to review and approval by the Placer County Community Development Resource Agency:* *If articulated or disarticulated human remains are encountered on the proposed project site during construction activities, all work within 100 feet of the find must cease, and any necessary steps to ensure the integrity of the immediate area must be taken. The Placer County Coroner shall be immediately notified. If*	Placer County Community Development Resource Agency Placer County Coroner NAHC	Prior to approval of improvement or grading plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			the Coroner determines the remains are of Native American origin, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall determine and notify a Most Likely Descendant (MLD). Further actions shall be determined, in part, by the desires of the MLD. The MLD shall be afforded 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendant may request mediation by the NAHC.			
6-4	Have the potential to cause a physical change which would affect unique ethnic cultural values, or restrict existing religious or sacred uses within the potential impact area.	*6-4*	*Implement Mitigation Measures 9-1(a) through 9-1(d).*	See Mitigation Measures 9-1(a) through 9-1(d)	See Mitigation Measures 9-1(a) through 9-1(d)	
7. Noise						
7-1	Generation of a substantial temporary increase in ambient	*7-1*	*Prior to approval of any permits authorizing construction on a rezone site, the project applicant shall prepare a*	Placer County Community Development	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
	noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	*construction noise management plan that identifies measures to be taken to minimize construction noise on surrounding sensitive land uses and include specific noise management measures to be included within the project plans and specifications, subject to review and approval by the Placer County Community Development Resource Agency. The noise management measures may include but are not necessarily limited to the following:* • *Construction activities shall only take place between the hours of 6:00 AM and 8:00 PM, Monday through Friday (during daylight savings); 7:00 AM and 8:00 PM, Monday through Friday (during standard time); and 8:00 AM and 6:00 PM, on Saturday;* • *All heavy construction shall be maintained in good operating condition, with all internal-combustion, engine-driven equipment fitted with intake and exhaust mufflers that are in good condition;* • *All mobile or fixed noise-producing equipment used on the proposed project that is regulated for noise output by a local, State, or federal agency shall comply with such regulations while in the project*	Resource Agency		

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		activity; • *Where feasible, electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment;* • *All stationary noise-generating equipment shall be located as far away as possible from neighboring property lines;* • *Signs prohibiting unnecessary idling of internal-combustion engines shall be posted;* • *If deemed warranted by the construction noise management plan, a minimum 6-foot-tall temporary construction sound wall shall be constructed along the project boundary adjacent to existing noise-sensitive receptors. The sound barrier fencing should consist of ½" plywood or minimum STC 27 sound curtains placed to shield nearby sensitive receptors. The barriers should be free from gaps, openings, or penetrations to ensure maximum performance. This temporary construction sound wall shall be constructed prior to any demolition or other ground disturbing activities associated with construction; and* • *The use of noise-producing signals, including horns, whistles, alarms,*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			and bells shall be for safety warning purposes only.			
7-3	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	*7-3*	*During construction activities associated with future development of the rezone sites, any compaction required within 25 feet of existing structures adjacent to a rezone site shall be accomplished by using static drum rollers rather than vibratory compactors/rollers. The aforementioned criteria shall be included in the project improvement plans for review and approval by Placer County prior to approval of the improvement plans.*	Placer County Community Development Resource Agency	Prior to approval of improvement or grading plans	
8. Transportation						
8-1	Conflict with a program, plan, ordinance, or policy, except LOS, addressing the circulation system during construction activities.	*8-1*	*Prior to the commencement of construction at any rezone site, a construction traffic control plan shall be provided to the Engineering and Surveying Division for review and approval. The construction traffic control plan shall include (but not be limited to) items such as:* • *Guidance on the number and size of trucks per day entering and leaving the project site;* • *Identification of arrival/departure times that would minimize traffic impacts;* • *Approved truck circulation patterns;* • *Locations of staging areas;*	Placer County Engineering and Surveying Division	Prior to commencement of construction or grading	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		• *Locations of employee parking and methods to encourage carpooling and use of alternative transportation;* • *Methods for partial/complete street closures (e.g., timing, signage, detour location and duration restrictions);* • *Criteria for use of flaggers and other traffic controls;* • *Preservation of safe and convenient passage for bicyclists and pedestrians through/around construction areas;* • *Monitoring for roadbed damage and timing for completing repairs;* • *Limitations on construction activity during peak/holiday weekends and special events;* • *Preservation of emergency vehicle access;* • *Coordination of construction activities with construction of other projects that occur concurrently in Placer County to minimize potential additive construction traffic disruptions, avoid duplicative efforts (e.g., multiple occurrences if similar signage), and maximize effectiveness of traffic mitigation measures (e.g., joint employee alternative transportation programs);*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		• *Removing traffic obstructions during emergency evacuation events; and* • *Providing a point of contact for Placer County residents and guests to obtain construction information, have questions answered, and convey complaints.*			
8-5	Result in VMT which exceeds an applicable threshold of significance, except as provided in CEQA Guidelines Section 15064.3, subdivision (b).	*8-5 Prior to Improvement Plan approval and/or Building Permit issuance on Sites #11, #12, #45, #54, and #55, the respective residential project applicant shall conduct a VMT study to the satisfaction of the County to identify and implement VMT reduction strategies that would reduce the site's VMT per resident to below the applicable County VMT threshold or to the maximum extent feasible if it is not feasible to attain the applicable threshold. Potential strategies include, but are not limited to, the following:* • *Provide end-of-trip bicycle facilities;* • *Limit residential parking supply;* • *Unbundle residential parking and property cost;* • *Provide affordable and below market housing;* • *Increase residential density; and* • *Provide e-bike subsidies or purchases.*	Placer County Community Development Resource Agency	Prior to approval of improvement plans, grading plans, or issuance of building permits on Sites #11, #12, #45, #54, and #55	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
9. Tribal Cultural Resources						
9-1	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074.	*9-1(a)*	*Prior to initiation of construction on Rezone Sites #9, #10, #19 through #22, #24 through #28, #34 through #36, #42 through #45, #49, #51, #54 through #58, #60 through #70, #73, and #74, all construction crew members, consultants, and other personnel involved in project implementation shall receive project-specific tribal cultural resource (TCR) awareness training. The training shall be conducted in coordination with qualified cultural resource specialists and representatives from culturally-affiliated Native American Tribes.* *The training will emphasize the requirement for confidentiality and culturally appropriate, respectful treatment of any finds of significance to culturally-affiliated Native Americans Tribes. As a component of the training, a brochure will be distributed to all personnel associated with project implementation. At a minimum, the brochure shall discuss the following topics in clear and straightforward language:* • *Field indicators of potential archaeological or cultural resources (i.e., what to look for; for example: archaeological artifacts, exotic or non-native rock, unusually large amounts of shell or bone,*	Placer County Community Development Resource Agency Placer County Coroner NAHC	Prior to commencement of construction or grading on Rezone Sites #9, #10, #19 through #22, #24 through #28, #34 through #36, #42 through #45, #49, #51, #54 through #58, #60 through #70, #73, and #74	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		significant soil color variation, etc.) • *Regulations governing archaeological resources and TCRs.* • *Consequences of disregarding or violating laws protecting archaeological or TCRs.* • *Steps to take if a worker encounters a possible resource.* *The training shall include project-specific guidance for on-site personnel including agreed upon protocols for resource avoidance, when to stop work, and who to contact if potential archaeological or TCRs are identified. The training shall also address stoppage of work if a potentially significant cultural resource is discovered during ground-disturbing activities, and in the case of possible human remains the proper course of action requiring immediate contact with the County Coroner and the Native American Heritage Commission (NAHC). The NAHC will assign a Most Likely Descendant (MLD) if the remains are determined by the Coroner to be Native American in origin.*			
		9-1(b) *The following language shall be noted on Improvement Plans for any future residential project located on the rezone sites, subject to review and approval by the Placer County Community*	Placer County Community Development Resource Agency	Prior to approval of improvement or grading plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Development Resource Agency: *If potential Native American precontact, historic, archaeological, or cultural resources, including midden soil, artifacts, chipped stone, exotic rock (non-native), or unusual amounts of baked clay, shell, or bone are uncovered during any on-site construction activities, all work must immediately stop within 100 feet of the find. Following discovery, a professional archaeologist shall be retained to evaluate the significance of the deposit, and the Placer County Community Development Resource Agency, the Department of Museums, and Native American representatives from culturally-affiliated Native American Tribes will make recommendations for further evaluation and treatment, as appropriate.* *In the event that the find is ineligible for inclusion in the California Historic Register of Historical Resources, the culturally-affiliated Native American Tribe shall be notified. Culturally appropriate treatment and disposition shall be determined following coordination with the culturally-affiliated Native American Tribe. Culturally appropriate treatment may include, but is not limited to, processing materials in a lab for reburial, minimizing handling of cultural objects, leaving objects in place within the*	County Coroner NAHC		

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		landscape, and returning objects to a location within the project area where they will not be subject to future impacts. The UAIC does not consider curation of TCRs to be appropriate or respectful, and requests that materials not be permanently curated unless requested by the Tribe. *If articulated or disarticulated human remains are discovered during construction activities, the County Coroner and NAHC shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the NAHC will assign the Most Likely Descendent (MLD) who will work with the project proponent to define appropriate treatment and disposition of the burials. Following a review of the find and consultation as noted above, the authority to proceed may be accompanied by the addition of development requirements or special conditions which may provide for protection of the site and/or additional measures necessary to address the unique or sensitive nature of the site. Work in the area of the cultural resource discovery may only proceed after authorization is granted by the Placer County Community Development Resource Agency following coordination with tribal representatives and cultural*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		resource experts, if necessary, as appropriate.			
		9-1(c) Cultural objects, including isolated artifacts of indigenous origin, are significant Tribal Cultural Resources to the UAIC and have been identified or have the potential to be identified within the project area. Impacts to such objects shall be mitigated by implementing culturally appropriate treatment of such objects when they are encountered during construction activities or when they are recovered as part of cultural resource surveys or identification efforts. Culturally appropriate treatment includes, but is not limited to, minimizing handling of cultural objects and leaving such objects in place within the landscape, if feasible. Culturally inappropriate treatment includes curation of such objects at museums or collection of objects for personal use, though such treatment only applies to private property. If cultural objects have been identified or have already been removed from the project area, then culturally appropriate treatment includes the return of such objects to the project area and placement in a location not subject to future impacts. Pursuant to Mitigation Measure 9-1(b), the CEQA lead agency representative shall notify the UAIC whenever cultural objects are found and shall coordinate culturally appropriate treatment with a	Placer County Community Development Resource Agency UAIC	During construction activities	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		representative from UAIC.			
		9-1(d) *If future residential development of Sites #9, #10, #19, #20, #27, and #28 is proposed, the following language shall be noted on project Improvement Plans, subject to review and approval by the Placer County Community Development Resource Agency:* • *The applicant shall notify Placer County a minimum of seven days prior to initiation of ground disturbance to allow the County time to notify culturally-affiliated tribes. Tribal representatives from culturally-affiliated tribes shall be allowed access to the project site within the first five days of ground-breaking activity to inspect soil piles, trenches, or other disturbed areas.* • *If potential Native American prehistoric, historic, archaeological, or cultural resources, including midden soil, artifacts, chipped stone, exotic rock (non-native), or unusual amounts of baked clay, shell or bone, are identified during this initial post-ground disturbance inspection the following actions shall be taken:* o *All work shall be suspended within 100 feet*	Placer County Community Development Resource Agency Tribal Representative	Prior to approval of improvement plans of Sites #9, #10, #19, #20, #27, and #28	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		of the find, and the project applicant shall immediately notify the County representative. The project applicant shall coordinate any subsequent investigation of the site with a qualified archaeologist approved by the Placer County Community Development Resource Agency and a tribal representative from the culturally-affiliated tribe(s). The archaeologist shall coordinate with the culturally-affiliated tribe(s) to allow for proper management recommendations should potential impacts to the resources be found by the County representative to be significant. o *A site meeting of construction personnel shall be held in order to afford the tribal representative the opportunity to provide TCR awareness information.* o *A written report detailing the site assessment, coordination activities, and*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		management recommendations shall be provided to the County representative by the qualified archaeologist. Possible management recommendations for historical, unique archaeological, or TCRs could include resource avoidance, preservation in place, reburial on-site, or other measures deemed acceptable by the applicant, the County, and the tribal representative from the culturally-affiliated tribe(s). o *The contractor shall implement any measures deemed by the County representative staff to be necessary and feasible to avoid or minimize significant effects to any identified TCRs, including the use of a Native American Monitor whenever work is occurring within 100 feet of the find.*			
Initial Study					
I-4	Create a new source of substantial light or glare which would adversely	*I-1* *Prior to approval of any permits authorizing construction on a rezone site, the project applicant shall submit a*	Placer County Community Development	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
	affect day or nighttime views in the area?	*lighting plan for the project to Placer County for review and approval, demonstrating that proposed lighting is Dark-Sky compliant as specified by the International Dark-Sky Association. The lighting plan shall include, but not necessarily be limited to, the following provisions:* • *Shield or screen lighting fixtures to direct the light downward and prevent light spill on adjacent properties;* • *Place and shield or screen flood and area lighting needed for construction activities and/or security so as not to disturb adjacent residential areas and passing motorists;* • *For public lighting, prohibit the use of light fixtures that are of unusually high intensity or brightness (e.g., harsh mercury vapor, low-pressure sodium, or fluorescent bulbs) or that blink or flash; and* • *Use appropriate building materials (such as low-glare glass, low-glare building glaze or finish, neutral, earth-toned colored paint and roofing materials), shielded or screened lighting, and appropriate signage to prevent light and glare from adversely affecting motorists on nearby roadways.*	Resource Agency		

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
VII-1	Result in substantial soil erosion or the loss of topsoil?	*VII-1*	*Prior to approval of any permits authorizing construction on a rezone site, the applicant shall prepare and submit Improvement Plans, specifications and cost estimates (per the requirements of Section II of the Land Development Manual (LDM) that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans shall show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. The applicant shall pay plan check and inspection fees and, if applicable, Placer County Fire Department improvement plan review and inspection fees with the 1st Improvement Plan submittal. (NOTE: Prior to plan approval, all applicable recording and reproduction costs shall be paid). The cost of the above-noted landscape and irrigation facilities shall be included in the estimates used to determine these fees. It is the applicant's responsibility to obtain all*	Placer County Community Development Resource Agency Placer County Engineering and Surveying Division	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed prior to submittal of Improvement Plans. *Conceptual landscape plans submitted prior to project approval may require modification during the Improvement Plan process to resolve issues of drainage and traffic safety.* *Any Building Permits associated with this project shall not be issued until, at a minimum, the Improvement Plans are approved by the Engineering and Surveying Division.* *Prior to the County's final acceptance of the project's improvements, submit to the Engineering and Surveying Division one copy of the Record Drawings in digital format (on compact disc or other acceptable media) along with one blackline hardcopy (black print on bond paper) and one PDF copy. The digital format is to allow integration with Placer County's Geographic Information System (GIS). The final approved blackline hardcopy Record Drawings will be the official document of record.*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		VII-2	*Prior to approval of any permits authorizing construction on a rezone site, the Improvement Plans shall show all proposed grading, drainage improvements, vegetation and tree removal and all work shall conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes shall be at a maximum of 2:1 (horizontal: vertical) unless a soils report supports a steeper slope and the Engineering and Surveying Division (ESD) concurs with said recommendation.* *The applicant shall revegetate all disturbed areas. Revegetation, undertaken from April 1 to October 1, shall include regular watering to ensure adequate growth. A winterization plan shall be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during, and*	Placer County Engineering and Surveying Division	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		after project construction. Soil stockpiling or borrow areas, shall have proper erosion control measures applied for the duration of the construction as specified in the Improvement Plans. Provide for erosion control where roadside drainage is off of the pavement, to the satisfaction of the Engineering and Surveying Division (ESD). *The applicant shall submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved engineer's estimate using the County's current Plan Check and Inspection Fee Spreadsheet for winterization and permanent erosion control work prior to Improvement Plan approval to guarantee protection against erosion and improper grading practices. For an improvement plan with a calculated security that exceeds $100,000, a minimum of $100,000 shall be provided as letter of credit or cash security and the remainder can be bonded. One year after the County's acceptance of improvements as complete, if there are no erosion or runoff issues to be corrected, unused portions of said deposit shall be refunded or released, as applicable, to the project applicant or authorized agent.* *If, at any time during construction, a field review by County personnel indicates a*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			significant deviation from the proposed grading shown on the Improvement Plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals prior to any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds for the revocation/modification of the project approval by the appropriate hearing body.			
		VII-3	*Prior to any construction commencing where ground disturbance exceeds one acre, the applicant shall provide evidence to the Engineering and Surveying Division of a WDID number generated from the State Regional Water Quality Control Board's Stormwater Multiple Application & Reports Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction storm water quality permit.*	Placer County Engineering and Surveying Division	Prior to any construction commencing where ground disturbance exceeds one acre	
VII-2	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially	*VII-4*	*The Improvement Plan submittal for development of each individual rezone site shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for Engineering*	Placer County Engineering and Surveying Division	Prior to approval of improvement or grading plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
	result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	*and Surveying Division review and approval. The report shall address and make recommendations on the following:*			
VII-3	Be located on expansive soils, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial direct or indirect risks to life or property?	*A) Road, pavement, and parking area design;* *B) Structural foundations, including retaining wall design (if applicable);* *C) Grading practices;* *D) Erosion/winterization;* *E) Special problems discovered on-site, (i.e., groundwater, expansive/unstable soils, etc.); and* *F) Slope stability.*			
VII-8	Result in exposure of people or property to geologic and geomorphological (i.e. Avalanches) hazards such as earthquakes, landslides, mudslides, seismic-related ground failure, or similar hazards?	*Once approved by the Engineering and Surveying Division (ESD), two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report.* *If the geotechnical engineering report indicates the presence of critically expansive or other soil problems that, if not corrected, could lead to structural defects, a certification of completion of the requirements of the soils report shall be required , prior to issuance of Building*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			Permits. This shall be so noted on the Improvement Plans.			
VII-5	Directly or indirectly destroy a unique paleontological resource or unique geologic or physical feature?	*VII-5*	*Should paleontological resources be discovered during ground disturbing activities associated with future residential development on any rezone sites, work shall be halted in the area within 50 feet of the find. The property owner shall then provide written evidence to the Planning Services Division that a qualified paleontologist has been retained by the applicant to observe grading activities and salvage fossils as necessary. The paleontologist shall establish procedures for paleontological resource surveillance and shall establish, in cooperation with the property owner, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of fossils. If major paleontological resources are discovered, which require temporary halting or redirecting of grading, the paleontologist shall report such findings to the project developer, and to the Placer County Department of Museums and Planning Services Division.* *The paleontologist shall determine appropriate actions, in cooperation with the project developer, which ensure proper exploration and/or salvage. Excavated finds shall be offered to a State-designated repository such as*	Placer County Community Development Resource Agency	During ground-disturbing activities	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			Museum of Paleontology, U.C. Berkeley, the California Academy of Sciences, or any other State-designated repository. If a designated repository declines to add the find to its collection, the finds shall be offered to the Placer County Department of Museums for purposes of public education and interpretive displays. *These actions, as well as final mitigation and disposition of the resources shall be subject to approval by the Department of Museums. The paleontologist shall submit a follow-up report to the Department of Museums and Planning Services Division which shall include the period of inspection, an analysis of the fossils found, and present repository of fossils.*			
VII-6 VII-7	Result in significant disruptions, displacements, compaction or overcrowding of the soil? Result in substantial change in topography or ground surface relief features?	*VII-6*	*Implement Mitigation Measures VII-1, VII-2, VII-3, and VII-4.*	See Mitigation Measures VII-1, VII-2, VII-3, and VII-4	See Mitigation Measures VII-1, VII-2, VII-3, and VII-4	
IX-2	Create a significant hazard to the public or the environment through reasonably foreseeable	*IX-1*	*In conjunction with submittal of a zoning clearance application, the Placer County Division of Environmental Health (PCDEH) shall review the applications to determine presence/absence of historic*	Placer County Division of Environmental Health	In conjunction with submittal of a zoning clearance application	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
IX-4	upset and accident conditions involving the release of hazardous materials into the environment? Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	*and/or current conditions which could present the potential for subsurface hazards. If potential hazard(s) are identified, the project applicant shall conduct a Phase I Environmental Site Assessment (ESA) for submittal to the PCDEH. If the Phase I ESA identifies any recognized environmental conditions (REC) related to historic and/or current uses that may have impacted soils, a Phase II ESA shall be prepared and submitted to PCDEH. If PCDEH determines that remediation is necessary based on the results of the Phase II ESA, such remediation shall be completed prior to approval of any improvement plans or any groundbreaking activities in accordance with state and county requirements. Should the project site be referred to an outside agency, such as Department of Toxic Substances Control for oversight, the applicant would need to provide a 'No Further Action' statement or equivalent from the agency.* *IX-2. Prior to issuance of a demolition permit by the County for any on-site structures, the project applicant shall provide a site assessment that determines whether any structures to be demolished contain lead-based paint, asbestos, PCB containing caulk, mercury, or other hazardous substances. If structures do not contain any hazardous substances, further*	Placer County Air Pollution Control District Placer County Building Services Division	Prior to issuance of a demolition permit	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		mitigation is not required. *If lead-based paint is found, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with federal, State, and local regulations. The demolition contractor shall be informed that all paint on the buildings shall be considered as containing lead.* *If any structures contain asbestos, the demolition or remodeling of any structure may be subject to the National Emission Standard for Hazardous Air Pollutants (NESHAPS) for Asbestos which may include inspection for the presence of asbestos by a certified asbestos inspector and mediation or removal of asbestos materials prior to demolition activity. The inspection results shall be submitted to the Placer County Air Pollution Control District (PCAPCD) and County Building Services Division. More information on Asbestos in Building Materials along with contact information can be found on the Placer County Air Pollution Control District's website at http://www.placerair.org/infoandeducation/asbestosinconstructionmaterials. (Based on the Code of Federal Regulations, Title 40, Part 61, Subpart M).*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		If any structures contain PCB containing caulk, mercury, or other hazardous substance, the applicant for the demolition permit shall prepare and implement an abatement plan consistent with federal, State, and local standards, subject to approval by the PCAPCD and Placer County Building Services Division. *The contractor shall take appropriate precautions to protect his/her workers, the surrounding community, and to dispose of construction waste in accordance with federal, State, and local regulations subject to approval by the PCAPCD and Placer County Building Services Division.*			
X-3	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: a) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; b) create or	*X-1* *Prior to approval of any permits authorizing construction on a rezone site, a Final Drainage Report shall be submitted for review and approval with the Improvement Plans.* *The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used during*	Placer County Engineering and Surveying Division	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
	contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?	*construction, as well as long-term post-construction water quality measures. The Final Drainage Report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Stormwater Management Manual that are in effect at the time of Improvement Plan submittal.*			
		X-2 *The Improvement Plan submittal and Final Drainage Report shall provide details showing that stormwater 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% of the difference between the pre-project and unmitigated post-project peak flows and volumes shall be reduced to pre-project conditions through the installation of detention/retention facilities. Detention/retention facilities shall be designed in accordance with the requirements of the Placer County Stormwater Management Manual that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division (ESD) and shall be shown on the Improvement Plans. The ESD may, after review of each project's Final Drainage Report, delete this requirement if it is determined that drainage conditions do not warrant installation of this type of facility.*	Placer County Engineering and Surveying Division	Prior to approval of improvement or grading plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Maintenance of detention/retention facilities by the homeowner's association, property owner's association, property owner, or entity responsible for project maintenance shall be required. Detention/retention facility construction shall not be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.			
X-4	Create or contribute runoff water which would include substantial additional sources of polluted runoff or otherwise substantially degrade surface water quality either during construction or in the post-construction condition?	*X-3* *Prior to approval of any permits authorizing construction on a rezone site, the Improvement Plans shall show water quality treatment facilities/Best Management Practices (BMPs) designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD)).* *Storm drainage from on- and off-site impervious surfaces (including roads) shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, etc. for entrapment of sediment, debris and oils/greases or other identified pollutants, as approved by the Engineering and Surveying Division (ESD). BMPs shall be*	Placer County Engineering and Surveying Division	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		designed in accordance with the West or East Placer Storm Water Quality Design Manuals, depending upon site location, for sizing of permanent post-construction BMPs for stormwater quality protection. No water quality facility construction shall be permitted within any identified wetlands area, floodplain, right-of-way, or Multi-Purpose easement, except as authorized by project approvals. *All permanent BMPs shall be maintained as required to ensure effectiveness. The applicant for each rezone site shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of on-going maintenance, such as contractual evidence, shall be provided to ESD upon request. The project owners/permittees shall provide maintenance of these facilities and annually report a certification of completed maintenance to the County DPW Stormwater Coordinator, unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of a monthly parking lot sweeping and vacuuming, and catch basin cleaning program shall be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Prior to Improvement Plan approval or Final Subdivision Map*			

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		recordation, easements shall be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance.			
		X-4 *Prior to approval of any permits authorizing construction on a rezone site, the Improvement Plans shall include the message details, placement, and locations showing that all storm drain inlets and bio-retention planters within the project area shall be permanently marked/embossed with prohibitive language such as "No Dumping! Flows to Creek." or other language and/or graphical icons to discourage illegal dumping as approved by the Engineering and Surveying Division (ESD).* *ESD-approved signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the project area. The Homeowner's/Property Owners' Association or property owner is responsible for maintaining the legibility of stamped messages and signs.*	Placer County Engineering and Surveying Division	Prior to approval of any construction or grading permits	
		X-5 *The project site is located within the permit area covered by Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources*	Placer County Engineering and Surveying Division	Prior to approval of improvement plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Control Board National Pollutant Discharge Elimination System [NPDES]). Project-related stormwater discharges are subject to all applicable requirements of said permit. *The project shall implement permanent and operational source control measures as applicable. Source control measures shall be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and shall be shown on the Improvement Plans.* *The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat stormwater, and provide baseline hydromodification management as outlined in the West or East Placer Storm Water Quality Design Manuals, depending upon site location.*			
		X-6 *For projects that create and/or replace 5,000 square feet or more of impervious surface (i.e., a Regulated Project as defined by the State of California NPDES Phase II MS4 Permit), a final Stormwater Quality Plan (SWQP) shall be submitted, either within the final Drainage Report or*	Placer County Engineering and Surveying Division	Prior to approval of improvement or grading plans	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		as a separate document that identifies how the project will meet the Phase II MS4 permit obligations. Site design measures, source control measures, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the Improvement Plans. In addition, pursuant to the Phase II MS4 permit, projects creating and/or replacing one acre or more of impervious surface (excepting projects that do not increase impervious surface area over the pre-project condition) are also required to demonstrate hydromodification management of stormwater such that post-project runoff is maintained to equal or below pre-project flow rates for the 2 year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bio-retention, and other LID measures that result in post-project flows that mimic pre-project conditions.			
X-5	Place housing or improvements within a 100-year flood hazard area either as mapped on a federal Flood Hazard boundary or Flood Insurance Rate Map or other flood hazard delineation map which would:	*X-7 Prior to approval of any permits authorizing construction on a rezone site, a floodplain analysis shall be prepared and submitted to the Engineering and Surveying Division for review and approval. The limits of the future, unmitigated, fully developed, 100-year floodplain for any drainageway on or near the project site with a tributary area of approximately 20 acres or more shall be determined and shown on the*	Placer County Engineering and Surveying Division	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
	a) impede or redirect flood flows; b) expose people or structures to risk of loss, injury, or death involving flooding; or c) risk release of pollutants due to project inundation?	*Improvement Plans. New development/construction, including grading, shall not be permitted within the 100-year floodplain and natural conditions shall be maintained within the 100-year floodplain except for limited encroachments/crossings and improvements for public roads, trails, and utilities.* *X-8* *Prior to approval of any permits authorizing construction on a rezone site, the Improvement Plans and Informational Sheet(s) filed with the Final Subdivision Map(s) shall show that finished house pad elevations shall be a minimum of two feet above the 100-year floodplain line (or finished floor -three feet above the 100-year floodplain line). The final pad elevation shall be certified by a California registered civil engineer or licensed land surveyor and submitted to the Engineering and Surveying Division. This certification shall be done prior to construction of the foundation or at the completion of final grading, whichever comes first. No building construction is allowed until the certification has been received by the Engineering and Surveying Division and approved by the floodplain manager. Benchmark elevation and location shall be shown on the Improvement Plans and Informational Sheet (s) to the satisfaction of the County.*	Placer County Engineering and Surveying Division	Prior to approval of any construction or grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM Housing Element Sites Rezone Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		X-9	*Prior to approval of any permits authorizing construction on a rezone site where a 100-year floodplain is identified, no increase in the 100-year floodplain limits / water surface elevation shall be allowed upstream or downstream from the project site.*	Placer County Engineering and Surveying Division	Prior to approval of any construction or grading permits	
		X-10	*Prior to approval of any permits that obtain approvals authorizing construction within floodplain areas on rezone sites #3, #4, #5, #6, #7, #23, #26, and #32 and if required by the Federal Emergency Management Agency (FEMA), the Placer County Flood Control District, or the County Floodplain Administrator, the applicant shall obtain from the Federal Emergency Management Agency (FEMA), a Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision based on Fill (CLOMR-F) for fill within a Special Flood Hazard Area. A copy of the letter shall be provided to the Engineering and Surveying Division. A Letter of Map Revision (LOMR), or a Letter of Map Revision based on Fill (LOMR-F) from FEMA shall be provided to the Engineering and Surveying Division prior to acceptance of project improvements as complete.*	Placer County Engineering and Surveying Division FEMA	Prior to approval of any construction or grading permits within floodplain areas on rezone sites #3, #4, #5, #6, #7, #23, #26, and #32 and if required by FEMA	