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ELK GROVE  
PLANNING DEPARTMENT

December 4, 2000

Mr. Patrick Angell  
City of Elk Grove  
8949 Elk Grove Boulevard  
Elk Grove, CA 95624

**Re: Lent Ranch Marketplace Draft Environmental Impact Report**

Dear Mr. Angell:

Following are comments on the subject EIR:

1. Page 3.0-5: Please include a Public Facilities Financing Plan (PFFP) in the list of Required Discretionary Actions/Entitlements. The PFFP is mentioned throughout the report as a means of obtaining conformance with mitigation measure and policy requirements. Therefore it should be considered a required element. 1
2. Pages 4.2-26 and 27, Transit System Operations. The reference to fee revenues for transit is misleading and potentially inaccurate. It presumes that a fee program is in place, which it is not. Reword to state: "A draft public facilities financing plan has been prepared which includes a transit fee component. The draft proposed fee would generate \$4.23 million in revenue from the Lent Ranch project." 2
3. Page 4.2-53, Table 4.2-26. The analysis supporting conformance with Policy CI-9 is speculative and vague, suggesting a spectrum of financing options that leave the reader wondering how compliance will be achieved. It should suffice to merely state that a PFFP that includes mechanisms to fund the required roadway infrastructure must be adopted by the City prior to a rezone. 3
4. Page 4.2-55, reword the last sentence under *Roadway Improvements* to read: "Funding for the improvements listed above will be addressed in the required PFFP for the project." 4
5. Page 4.3-22, Table 4.3-8, Policy AQ-9 analysis. RT has been very tentative providing cost estimates for transit service and service commitments. In the event RT does not provide service, is the City then obligated to use fee revenue to provide its own service, or does it have discretion in this matter? The City will need to understand this when considering what transit fee is appropriate. 5
6. Section 4.13, Economic Effects. This section refers to an economic analysis performed by BAE, which is not included in the Appendices to the report. This should be included. The text in 4.13 summarily dismisses any economic effect due to the proposed project, yet there is nothing in the report to support these conclusions. 6

If you have any questions regarding these comments please feel free to call me at 874-6437.  
Paul Philleo  
Senior Civil Engineer, Infrastructure Finance Section

6. Letter from City of Elk Grove, Infrastructure Finance Section, Paul Philleo, dated December 4, 2000

**Response 1**

The requested revision has been made. Please refer to Final EIR Section 4.0, Minor Edits to the Draft EIR, for revised Draft EIR Section 3.0, Project Description.

**Response 2**

The requested revision has been made. Please refer to Final EIR Section 4.0, Minor Edits to the Draft EIR, for revised Draft EIR Section 4.2, Traffic.

**Response 3**

In satisfaction of this requirement, the City would adopt the PFFP consistent with other PFFPs prepared for other projects in the County. It should be noted that historically within the County that the PFFP has been adopted prior to rezone. The remaining text presented in the Draft EIR will remain because it provides information useful to the reader describing the location of expected improvements, their purpose and some estimated costs.

**Response 4**

The commentor misunderstood the text discussion, which was related to base cumulative condition not including the project. The requested text revisions have not been made by the City.

**Response 5**

This comment is acknowledged. Final negotiations regarding transit provisions and funding will be handled during project consideration.

**Response 6**

Bay Area Economics (BAE) analysis is provided within **Appendix B** of this Final EIR. The information contained within this report is summarized in Draft EIR Section 4.13, and is adequate to make the appropriate conclusions. Please also refer to **Topical Response 5 - Availability of Documents Utilized in the Preparation of the Draft EIR**.