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December 7, 2000

ELK GROVE  
PLANNING DEPARTMENT

City of Elk Grove  
ATTN: Patrick Angell  
8949 Elk Grove Boulevard  
P.O. Box 1776  
Elk Grove, CA 95759-1776

RE: LENT MALL EIR MONSTROSITY - STOP THE LENT MALL SPRAWL

Stop the Lent Mall traffic jams, air pollution, and destruction of all farmland in Elk Grove,

1

Given that the fact that all members of the Elk Grove City Council has received thousands of dollars from the mall developers it is like spitting into the wind trying to get them interested in the negative aspects of this lent mall sprawl. Nonetheless, here are my comments on this EIR. I am a Registered Environmental Assessor, a Certified Health Physicist, and a Senior Engineer. I have read the current EIR and found that it nearly identical to the one rejected by the Sacramento County Policy Planning Commission in October, 1999. Rather than improve their project the lent sprawl city slickers spent over \$30,000 buying their way into local politics. None of the politicians who backed the sprawl bothered to read the EIR as they pranced around town ignorantly sprewing the M&H greed propaganda.

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EIR Section 1.0 states that this project was rejected by Sacramento County in October, 1999. Why was it rejected? Why shouldn't we reject it now? ANS: The Elk Grove city council has been paid thousands of dollars by the sprawl developers,

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EIR Section 2.0 repeatedly states "significant and unavoidable" negative impacts from all aspects of this sprawl. Why? Because the cheapskate sprawl developers refuse to spend the money to fix the problems. They want to get the dopey EG council to sign a Statement of Overriding Considerations that acknowledges and applauds the environmental destruction. That means the citizens of EG are stuck with the burden that M&H ought to paying for. M&H brags that its so rich but then it doesn't have the money to clean up its mess. Why? Because the EG city council will let them off the hook.

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EIR Section 3.0 states that the project site is currently zoned Agriculture (AG-80). There is plenty of land in Sacramento County that is not agricultural and has been blighted by previous development; eg, the site of the old charcoal factory on Waterman Road that burnt down several years ago. It should be redeveloped. M&H is too cheap to do redevelopment. Why doesn't M&H take this grand project to its own home town? ANS Because its destructive costs outweigh its benefits and the people there won't stand for this mess – unlike the dopey EG council.

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We don't need the minimum wage jobs from these retail markets. It takes over \$16/hour to survive in Sacramento. We will need food stamps to survive on the lent mall wages. Meanwhile, the M&H developers make millions.

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EIR Section 4.0 says that the EG city council should sign a Statement of Overriding Considerations for the significant and unavoidable impacts caused by the sprawl. Why should I and the EG taxpayers pick up the costs for the mess caused by the cheapskates from the big city preying on a little town.

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I am opposed to Elk Grove expanding its sphere of influence. I live in Elk Grove and the five members of our City Council have shown that they are poor stewards of the land. The \$500 million Lent Mall Monstrosity is a blatant example. Please Stop the Lent Mall Sprawl. I live in Elk Grove by the park and the **traffic sucks** on East Stockton Blvd at Grantline. There are so many new riff raff factories down there. They have made no plans for widening the entire length of Grantline Road as they support more sprawl. I don't need another place to shop. Why do we need another shopping sprawl? For years the Sacramento Bee has stated the obvious - sales tax lust by the Sacramento County Board of Supervisors. Now the Elk Grove City Council thinks that it is generating sales tax from the Lent Sprawl but they are just taking it from somewhere else. RE: People only have a finite amount of money to spend. Wise up. Nobody makes any more money for the county just by opening another store.

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The mall sprawl only creates **minimum wage jobs** that people can't live. We just had the factory close down at the old Army depot. We should concentrate our efforts on getting new industrial jobs and not entry level clerical positions.

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Don't allow this sprawl on the Consumes River bed. **Save the farmlands.** Please tell the Elk Grove City Council to stop being greedy pigs and poor neighbors to Galt. We don't need more development. The costs and headaches from these sprawling conglomerates outweigh the puny sales revenues. We were told that Elk Grove cityhood already had enough taxes and no more revenue was needed when we incorporated. Now the Elk Grove liars tout all the millions they daydream about getting from this unbridled sprawl. M&H Developers should **go back** to the congested Bay Area and don't bring their congestion to our area.

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Repeatedly the Sacramento Bee has headlined the concern for blowing up the natural gas tanks within a half-mile of the mall sprawl. Every day the Bee reports the hazards of those tanks. They were built way out there because there was nothing else in the vicinity. Now idiots like the Elk Grove Council have supported building right up to their doorsteps. The gas company kept warning that this was unsafe. Lawrence Livermore Labs (and they are smarter than M&H) says that the tank explosion could cause up to 50% fatalities within a mile. Good bye Lent Mall Sprawl. Before anyone supports the Lent Mall Sprawl they should read the Environmental Impact Report (EIR) and talk to the **chief of the Elk Grove Fire Department** (and he is smarter than M&H). He is an expert in safety (and M&H is not) and he **wants the gas tanks to remain isolated**. They were meant to remain isolated. The fire chief will tell you that it was a mistake to spend several million dollars putting housing development within a mile of the tanks. Now goof balls like the Elk Grove Council support spending several hundred million dollars for the Lent Mall Sprawl within a ½ mile of the tanks. They don't give a damn about public safety. They're in the back pocket of the developers. They don't care about saving the open lands for our children.

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What's the difference between Elk Grove Council and the sprawl promoters on the County Board of Supervisors? **ANS: At least the County voted down the future sprawl around the Suburban Gas.**

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**Environmental Goals:**

1. We intend to leave this place in better shape than we found; e.g. by remediating sites that are blighted or have hazardous soils.
2. We will save all farmland from development. Future development should occur on areas that were previously developed and are available for urban renewal.
3. All developments should be completed under a Negative Declaration in accordance with the California Environmental Quality Act. This means there will be no significant impacts on any aspect of the environment.
4. Incompatible adjacent land uses and environmental racism shall not be allowed; i.e., industrial facilities shall not be located adjacent to housing.
5. No development will be allowed if it causing a worsening of the traffic flow in the area. All necessary traffic improvements must be fully paid for and in place prior to the operation of the new development.

*Michael J. Braun*  
*8808 Minnie Circle*  
*Elk Grove, CA 95624*

30. **Letter from Michael Brown, dated December 7, 2000**

**Response 1**

Draft EIR, Section 4.2, Transportation and Circulation, addresses the impacts of the proposed project to the local and regional transportation system. Project impacts to local and regional air quality impacts are discussed in Draft EIR Section 4.3, Air Quality. The commentor is incorrect in inferring that the Lent Mall will destroy all of the farmland in Elk Grove. Draft EIR Section 4.1, Agricultural Resources, states that the project would convert approximately 293 acres of Farmland of Statewide Importance. As indicated on page 4.1-10, "the County has a total of approximately 67,700 acres of Farmland of Statewide Importance." Therefore the Lent Ranch Mall site represents 0.4 percent of land within the County designated as Farmland of Statewide Importance. In addition, please refer to **Topical Response 2 - Agricultural Resources** for additional information on the loss of farmland.

**Response 2**

The comment is acknowledged. Because it does not address the content of the Draft EIR, no further response is required.

**Response 3**

The commentor is incorrect in his quotation of Draft EIR Section 1.0, Introduction, with regard to review by Sacramento County. Draft EIR Section 1.0, Introduction, page 1.0-1 states that the Lent Ranch Marketplace project was previously examined by the County of Sacramento in May, 1999 within a document titled: *Lent Ranch General Plan Amendment, Rezone, and Transportation System Management Plan Draft EIR, SCH No. 97122002*. The County Planning Commission recommended denial of the proposed project. However, the Sacramento County Board of Supervisors did not reject the project.

**Response 4**

The commentor is incorrect in that the County of Sacramento did not reject this project. Specifically, this project was not reviewed or rejected by the County of Sacramento Board of Supervisors.

**Response 5**

The purpose of the EIR is to disclose information concerning the environmental impacts of the proposed project pursuant to CEQA. If the proposed project would create significant and unavoidable impacts it is the responsibility of the Draft EIR to disclose impacts as such.

**Response 6**

The *CEQA Guidelines* are clear with regards to the adoption of a Statement of Overriding Considerations (SOC). *CEQA Guidelines* Section 15093 outlines when it is appropriate to adopt a statement of overriding considerations. CEQA requires the decision-maker to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the project. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." and a Statement of Overriding Consideration may be adopted. At his point in time the City of Elk Grove has not adopted a SOC which would be done with final project approval. The adoption of a SOC must be done by the City for any impacts that are considered to be significant and unavoidable in accordance with State law.

Other comments made within this paragraph are acknowledged. Because they do not address the content of the Draft EIR, no further response is required.

**Response 7**

The commentor is correct in that Draft EIR Section 3.0, Project Description, states that the project site is zoned Agricultural (AG-80). The remainder of the comments with the paragraph are acknowledged. However, because they do not address the content of the Draft EIR, no further response is required.

**Response 8**

The comment is acknowledged. Because it does not address the content of the Draft EIR, no further response is required.

**Response 9**

Draft EIR Section 4.0 provides a general format of the environmental analysis, impact statements, important definitions utilized in the analysis, and cumulative methodology. This section does not

indicated that the City should sign a statement of overriding, but rather that if the City of Elk Grove decides to approve the project, a Statement of Overriding Considerations must be adopted by the City Council for any identified significant and unavoidable impacts, as required by the State *CEQA Guidelines*, Section 15093(b).

**Response 10**

The comment is acknowledged. Because it does not address the content of the Draft EIR, no further response is required. No sphere of influence expansion is proposed as part of this project.

**Response 11**

The comment is acknowledged. Because it does not address the content of the Draft EIR, no further response is required.

**Response 12**

Draft EIR Table 4.2-7, Intersection Analysis - Existing Conditions (page 4.2-8 of Section 4.2, Transportation and Circulation), shows that the East Stockton Boulevard/Grant Line Road intersection is operating at a Level of Service E. Roadway improvements associated with the development of other projects are not the responsibility of the proposed project. It should be noted that Grant Line Road is planned for widening under the General Plan.

**Response 13**

The comment is acknowledged. Because it does not address the content of the Draft EIR, no further response is required.

**Response 14**

This comment is acknowledged. Because it does not address the content of the Draft EIR, no further response is required.

**Response 15**

Project impacts to agricultural lands are discussed in Draft EIR Section 4.1, Agricultural Resources. Project impacts to biological resources, including the proximity to the Cosumnes River, is addressed in Draft EIR Section 4.8, Biological Resources.

**Response 16**

The issue of the proposed project's location in relation to the Suburban Propane tanks is discussed in detail in Draft EIR Section 4.5, Hazards.

**Response 17**

The comment is acknowledged. Because it does not address the content of the Draft EIR, no further response is required.

**Response 18**

This comment is acknowledged. Because it does not address the content of the Draft EIR, no further response is required.