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December 2, 2000

City of Elk Grove
Planning and Community Development
8949 Elk Grove Boulevard
Elk Grove, California 95624

Attention: Patrick Angell

RE: Comments on the DEIR for the Lent Ranch Marketplace AND Highway
99/Grantline Road Interchange

Dear Mr. Angell:

Thank you for the opportunity to comment on the Lent Ranch Marketplace proposal.

First, I would like to preface by saying, I am a previous resident of Elk Grove. In the 25 years of residence, I have witnessed the progression of the Elk Grove area from a one 4-way stop (Elk Grove Blvd. and Elk Grove-Florin Road) to what has evolved today. I have raised my family in Elk Grove and have supported local businesses. My concern is what occurs from today regarding the future of Elk Grove.

Overview Discussion

After reading the Draft Environmental Impact Report on the Lent Ranch Marketplace, I am very concerned that the City of Elk Grove (City) has not taken the most important steps in the City's planning processes in relation to this specific project proposal. I believe the City is aggressively moving forward with the Sphere Of Influence (SOI) application. I also understand that the City has not adopted it's own General Plan and that the City is operating under the Sacramento County General Plan. The sheer magnitude of these issues and the possible planning changes they will bring to the City, it would seem pertinent that the Lent Ranch Marketplace proposal is premature.

First and foremost, the City should be operating under it's own General Plan. As I recall, the citizens of Elk Grove, at the time of incorporation, were very concerned about directing the growth of their City independent of the County of Sacramento. In absence of the City's own planning guidelines, the question arises, are the residents wishes being truly represented? If the Lent Ranch Marketplace application goes forward under the current Sacramento County General Plan, then the question arises, will the new Elk Grove General Plan be influenced by such a major project? This can be problematic.

The SOI application and possible approval could have major impacts to the City with respect to growth patterns. The residents of the City may want to direct growth into other areas or may not desire major growth. To approve such a major project as the Lent Ranch Marketplace would be directing growth to one specific area, and according to the DEIR this project is growth inducing. Without the SOI approval beforehand, the Lent Ranch Marketplace could therefore be problematic also.

2

The following comments pertain to specific issues addressed in the DEIR.

Section 4.1 Agriculture

The Lent Ranch Marketplace proposal sits on the southern Urban Services Boundary in an agricultural area. The Draft EIR is lacking dialog with respect to land buffers to protect the agricultural lands to the South and to the West of the project site. I suggest that conservation easements be explored and addressed as mitigating factors to create buffers to protect these agricultural lands. This should be a major component, in light of ongoing agriculture practices in this area.

3

The DEIR does not address protections for the Sacramento County Urban Services Boundary at Kammerer Road. Being the proposed project sits on this boundary, and the project is growth inducing, it would seem pertinent that Elk Grove Planning staff should recommend measures to protect this growth boundary. I would like to see this addressed in the final EIR.

4

Section 4.2 Transportation

The DEIR addresses the impacts and mitigation factors of the roads and intersections in the city limits of Elk Grove. What is lacking in this report, is traffic studies of roads that feed into and out of the City. For example, what are the trip counts for Grantline Road, from the proposed project site north to Highway 16? What are the trip counts for Wilton Road? What are the trip counts for Dillard Road? Grantline Road is proposed to be widened to six lanes, and is designated to be a main thoroughfare through the region. It would be helpful to include in the final EIR, studies showing the traffic impacts for the above mentioned roads.

5

There is little mention in the DEIR regarding the interchange proposed at the Highway 99/Grantline Road location, with the exception that this will be addressed in a separate EIR. The proposal of the Lent Ranch Marketplace is dependent on the interchange plan. How can one be addressed without the other? One cannot assess the possible impacts without knowing what will be proposed with the other. According to CEQA Guidelines Section 15378, the City must consider the impacts of both proposals in the same EIR since they are both part of the same "project." I strongly urge the city planners consider these two projects linked together and a single EIR be presented. If this is not workable, I would suggest that the DEIR on the interchange be produced as an Amendment to the

Lent Ranch Marketplace DEIR. This would enable the stakeholders to make comments on the complete scope of the proposed project.

5

Section 4.12 Employment

It is noted that the DEIR document states approximately 7,700 jobs will be created by the Lent Ranch Marketplace. For the reader to understand the breakdown of income levels, it would be appropriate to show the breakdown of low, moderate and upper level income jobs. This information should be compared to available housing, schools, etc. in the City of Elk Grove. This information should show the reader how many of these job levels could afford to purchase homes in the City of Elk Grove. This information pertains to the added tax base to the city, traffic trip counts, and air quality.

6

Section 4.13 Economic

Although, the DEIR does speak to the local and regional (Sacramento County) economic aspects pertaining to the proposed project, there is no mention of the impact that the E-Commerce industry may have on the proposed shopping mall. In today's society, more emphasis is being put on shopping over the internet. I strongly urge that a study be done by an independent company that will show what the effects of the internet buyer may be, in relation to "shopping at the mall."

7

Section 6.0 Alternatives

It is noted in the DEIR that alternatives are addressed regarding the site proposal. Due to the fact that the City of Elk Grove has not adopted it's own General Plan, I would suggest that Alternative 1A be recommended for this 295-acre site until such time as the Elk Grove General Plan is completed, then Alternatives 2, 3, 4, and 5 can be addressed. It is also noted, in the document, that most of the dialog lends itself to the mall portion of the site proposal. This being the case, then an alternative site with less acreage could be suitable being the mall acreage is 105.8 of the total 294.8 acres. According to this section in the document, it is apparent that alternative sites of 105 acres were not studied. It would be helpful to show the reader that a concerted effort has been made to present other alternatives. The DEIR speaks to the importance of freeway access but this reader notes the Sunrise Mall does not have freeway access and has been a viable mall for the City of Citrus Heights.

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On October 19, 1999 the Policy Planning Commission of Sacramento County recommended denial of this project on a 3-2 vote. Some of those who voted against the proposal did indicate support for portions of the project. The following comments were forwarded to the Board of Supervisors:

10

1. The Planning Commission is concerned about the size of the project and the amount of commercial development adjacent to the mall. The Commission recognizes that the project contains 173 acres of commercial development proposed for GC and SC

I would appreciate being put on your list of contacts, to receive any further mailings regarding the Lent Ranch Marketplace or other additional proposed project planning items.

Again, thank you for the opportunity to make these comments.

Sincerely,

A handwritten signature in cursive script that reads "Mindy Cecchetti". The signature is written in black ink and is positioned above the printed name.

Mindy Cecchetti

31. Letter from Mindy Cecchetti, dated December 2, 2000

Response 1

The County of Sacramento General Plan, which was expressly adopted by the City of Elk Grove upon incorporation, is the current and valid General Plan of the City of Elk Grove. As such, the current General Plan serves as the "constitution" for all planning decisions in the City of Elk Grove. The current General Plan was adopted through a public process, with public input and environmental review pursuant to CEQA. The incorporation of the City of Elk Grove did not establish a de facto moratorium on development within the City boundary for the length of time necessary for the City to prepare a new General Plan, and the City is permitted to consider and approve development projects under the current General Plan. Under state law, the City has at least 30 months after incorporation to implement a new General Plan if it chooses to do so. *Government Code §65360*. At present, the current General Plan is in effect and governs this project.

The City intends to commence with the preparation of new General Plan for the City this year. The City Council is expected to provide City staff initial direction on how to proceed with the General Plan process in February. The City will be soliciting input from City residents and interested parties on the scope of the General Plan in the future and will have an extensive public participation process.

Response 2

Please note that the Lent Ranch Marketplace project does not involve a modification to the USB and the project is in fact included within the area planned for development in the General Plan. However, the proposed project, together with the other cumulative projects that are approved, planned or proposed in the area, could result in increasing growth pressure on the City or County to modify the Urban Policy Area and Urban Service Boundary. This increase in pressure, particularly to the south across Kammerer Road, may result in agricultural land being converted to urban type use for the economic benefit of the landowner. Allowing growth beyond the USB would be under the control of the City and County. The development within the USB is not connected to any decisions with regards to the Sphere of Influence.

Response 3

Please see **Topical Response 2 - Agricultural Resources**, which addresses the issue of agricultural buffers and implementation of other potential mitigation measures.

Response 4

Please see **Topical Response 4 - Growth Inducing Impacts**, and Draft EIR Section 8.0, Growth Inducement, for a discussion of growth-inducing impacts. The request that the City recommend mitigation to protect the USB boundary is acknowledged, and does not pertain to the adequacy or completeness of the Draft EIR. Also refer to **Topical Response 2 - Agricultural Resources** regarding agricultural buffers.

Response 5

The scope of the traffic analysis was developed under the direction of City of Elk Grove and Sacramento County staff and included the analysis of Grant Line Road between State Route 99 and Bradshaw Road. All of the County maintained roadways in question are two-lane roadways with moderate access control, have standard roadway cross-sections, and have a capacity of 18,000 vehicles per day based on the City of Elk Grove and Sacramento County Traffic Impact Guidelines (summarized in Draft EIR Table 4.2-1). State Route 16 (east of Grant Line Road) is as a rural two-lane highway. The capacity of a rural two-lane highway is 22,900 vehicles per day as outlined in the City of Elk Grove and Sacramento County Traffic Impact Guidelines. Existing (i.e., "No Project") daily volumes for the roadways in question are summarized below:

County Maintained Roadways (Source: Sacramento County Traffic Volume Flow Map, 1998)

- Grant Line Road (east of Bradshaw Road) - 7,900 vehicles per day;
- Wilton Road (east of Grant Line Road) - 10,600 vehicles per day;
- Wilton Road (west of Dillard Road) - 3,400 vehicles per day;
- Green Road (north of Wilton Road) - 3,500 vehicles per day;
- Dillard Road (north of Wilton Road) - 2,800 vehicles per day;
- Dillard Road (south of Wilton Road) - 3,400 vehicles per day; and

State Highway (Source: Caltrans, 1998 Traffic Volumes on California State Highways)

- State Route 16 (east of Grant Line Road)¹ - 12,300 vehicles per day.

Eight percent of project trips (approximately 5,100 vehicles per day) are expected to use Grant Line Road east of Bradshaw Road. Assuming all 5,100 trips use each roadway in question (which is unlikely), the daily volume on each roadway would still be less than the capacity of 18,000 vehicles per day for the County maintained roadways (22,900 vehicles per day for State Route 16) as identified in the City of Elk Grove and Sacramento County Traffic Impact Guidelines and would operate at acceptable levels of

service. Consequently, the impact of the project on these roadways would be less than significant. This scenario is “worst-case” since the actual percentage of project trips on these roadways would likely be less than eight percent.

The project and the SR-99/Grant Line Road Interchange are two separate “projects” under CEQA, and thus are appropriately analyzed in two separate EIR documents. Please refer to **Topical Response 1 - Segmentation** for further discussion.

Response 6

Because the proposed tenants that would be occupying the project at this time are unknown, the breakdown of income levels would be speculative at this point of time. For example, the office use could be occupied by employment opportunities that range greatly in income levels such as lawyer compared to a telephone marketer. The courts have stated that no purpose can be served by requiring an EIR to engage in sheer speculation as to future environmental consequences.

It should note, however, that the Draft EIR does contain an analysis of the expected job creation attributable to the project, and the potential for growth inducement resulting from the housing needs of project employees. This analysis includes cost of housing, housing availability, and expected housing demand. This analysis can be found at pages 4.12-7 to 4.12-9 of the Draft EIR. In addition, the project’s impact on schools is addressed in Draft EIR Section 4.6, traffic and circulation in Draft EIR Section 4.2, and air quality in Draft EIR Section 4.3.

Response 7

The effect of internet buyers is assessed in the BAE analysis. Please refer to Letter 23, Response 18 for a detailed discussion of internet services.

Response 8

The commentor’s support of Alternative 1A is noted. With respect to the commentor’s statement that alternative sites of 105 acres were not studied in the Draft EIR - this is true. *CEQA Guidelines* Section 15126.6 (f) provides guidance to the number of alternatives required to be analyzed in an EIR:

“Rule of reason. The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or

substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”

The City of Elk Grove believes that the range of alternatives discussed in the draft EIR provides a reasonable range of alternatives in order to make a well-reasoned and sound decision concerning the proposed project.

The Draft EIR does in fact present alternatives that show a project reduced in size. See Draft EIR Section 6.0, Alternatives, and specifically Alternatives 3 and 4. The proposed project is 295 acres in area. The Draft EIR also presents Alternative 5 - Off-Site Alternative - Poppy Ridge which addresses a site that contains 285 acres, which is similar in area to the proposed project and is, therefore, appropriate for analysis as an alternate site.

Please also see **Topical Response 3 - Off-Site Alternatives** for further discussion on this issue.

Response 9

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

Response 10

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