

From: PMC
Sent: Friday, December 01, 2000 8:40 AM
Subject: Lent Ranch Comments

Email: lpereira@ns.net
Phone:
Date: 12/01/00
Time: 09:39 AM

Address:

Comments:

I am concerned that the EIR for Lent Ranch does not adequately discuss the impacts and potential mitigation measures in a number of areas. I am particularly concerned about the location adjacent to the USB and the impact to the land between the project and the Cosumnes River. I am also concerned that the draft EIR does not provide a mitigation measure for the loss of farm land. In regards to traffic, this mall is regional in nature and therefore the number of roads that will be impacted by this project are much greater than those addressed in the draft EIR. We should learn from similar and recent experience with the opening of the Galleria in Roseville. The Galleria is proud to publicize that on opening day they attracted 100,000 customers. The Friday after Thanksgiving they had attracted 50,000 customers by 5 p.m. Certainly these numbers show that people drive great distances to visit the Galleria, thus creating traffic and air quality impacts in an area much greater t!

han the area immediately surrounding the mall. The volume of people who attend a regional mall significantly impacts both traffic congestion and air quality. How does the EIR factor in the traffic and air quality impacts in the area which is not immediately adjacent to the mall? In addition, because the developer is choosing to locate a major commercial project on the edge (or beyond the edge) of development, it should be the responsibility of the Project to fund a comprehensive transportation system either by providing funding to Regional Transit or by financing a private bus/shuttle system. As it stands today, employees and visitors of the mall would not have any options other than to drive a vehicle to the project. The draft EIR provides the potential zoning for each segment of the project. It is my understanding that the zoning types listed for the most part are incredibly flexible and could result in a range of uses from business professional to automotive. Without t!

he zoning being more specific to each of the project component sites, I find it difficult to analyze the true impact of the project on traffic and air quality issues. Certainly a use such as a tire shop generates different traffic counts and patterns than an office. Please explain in the final EIR how the range of uses are accounted for in the document, and what the impacts would be if the uses in the areas with flexible zoning end up being all office or all automotive commercial. Finally, I find it hard to believe that the economic impact of this project would not be detrimental to existing retail in the City of Elk Grove and in the region. Again, recent news reports indicate that the opening of the Galleria has impacted the business of the other malls in our region by 5 to 10% this holiday season alone. Are the economic impacts of this project adequately reflected in the draft EIR.

Thank you

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44. Letter from lpereira@ns.net, dated December 1, 2000

Response 1

The comment indicates that the Draft EIR does not adequately discuss the impacts and potential mitigation measure in a number of areas, but fails to indicate which issue areas and mitigation measures are inadequate. As such, no response can be provided to this general comment.

The growth-inducing impacts associated with pressure on the USB and on land outside of the USB such as between the project site and Cosumnes River are addressed in Draft EIR Section 8.0, and **Topical Response 4 –Growth Inducing Impacts.**

Project impacts to biological resources, including the proximity to the Cosumnes River, are addressed in Draft EIR Section 4.8, Biological Resources.

Response 2

Please see **Topical Response 2 - Agricultural Resources** for a discussion on the loss of agricultural land and evaluation of mitigation measures.

Response 3

The commentor suggests that more roads should have been considered but does not identify the roads that should have been considered. The directional distribution of project traffic and impacted roadway onto the surrounding road network was based on travel patterns generated by the Sacramento County travel demand model and adjusted based on existing travel patterns in the area. Traffic distribution under existing conditions generally favors areas to the north of the site using the Grant Line Road interchange. This pattern is expected given the project site's location in the southern area of the City of Elk Grove.

Response 4

Please note that number of persons drawn to the opening of the Roseville Galleria resulted in unusual shopping conditions due to this being a special event and the novelty associated with this new facility.

Traffic and circulation associated with trips from outside the project area that would access the project from SR-99 have been considered in the Draft EIR, as well as air quality impacts associated with anticipated traffic. Please refer to Draft EIR Section 4.2, Traffic and Circulation, and Draft EIR Section 4.3, Air Quality. The Draft EIR traffic analysis was based upon a regional model, which considers traffic coming to/from the project from throughout the region and evaluated the potential impacts of the project on regional facilities including State Route 99, Interstate 5 and Grant Line Road in the vicinity of the project. The data and conclusions of the traffic analysis form a basis of the air quality analysis in the Draft EIR. As noted by the Draft EIR, the project will have a significant and unavoidable impact on regional air quality, although the Project will implement feasible air quality mitigation measures contained in the Transportation Systems Management (TSM) plan required by General Plan Policy AQ-15. See Draft EIR at page 4.3-14.

Response 5

The Draft EIR traffic analysis was based upon a regional model, which considers traffic coming to/from the project from throughout the region and evaluated the potential impacts of the project on regional facilities including State Route 99, Interstate 5 and Grant Line Road in the vicinity of the project.

Air quality emissions are addressed on pages 4.3-10 through 4.3-18 of the Draft EIR, and include both traffic-related and stationary sources. These emissions would be generated on a regional basis and would affect the entire air basin, which includes the areas surrounding the project area. In addition, please refer to Draft EIR Table 4.3-5 on page 4.3-14 where numerous mitigation measures are provided that would reduce total project emissions. Regardless of the implementation of these mitigation measures, however, air quality impacts associated with the project were considered to be significant and unavoidable.

Response 6

Regional Transit (RT) maintains a 20-year master plan of transit facilities for the Sacramento region. The RT Master Plan and the City's General Plan show that feeder service is intended for: 1) Elk Grove Boulevard between SR-99 and the Union Pacific Railroad line (UPRR), and 2) Bruceville Road between Poppy Ridge Road and Laguna Boulevard.

Besides providing local bus service, the planned feeder service is intended to support future "trunk" transit service along the UPRR line from downtown Sacramento to Bilby Road. This service is not in the current RT Master Plan but is a long-range concept. A light rail transit line extension to Grant Line Road

on the existing Southern Pacific rail line near Waterman Road is part of RT's Master Plan. The Lent Ranch Marketplace project site lies in an area not served by a transit provider.

All thoroughfare, arterial, and collector streets in the vicinity of the project site would be designed to accommodate transit facilities such as turnouts, bus stops, and shelters. The project would include standard on-street bus turnout and passenger curbside shelters and provide funding for transit services.

Response 7

The number of trips generated from the proposed Lent Ranch Marketplace project was estimated based on the fitted-curve equation for the shopping center land use category (820) summarized in *Trip Generation*, Institute of Transportation Engineers, 6th Edition, 1997. This land use category includes neighborhood centers, community centers, regional centers, and super regional centers which can include tire shops and such non-merchandise facilities as office buildings, movie theaters, restaurant, post offices, banks, health clubs, and recreational facilities (e.g., ice skating rinks and indoor miniature golf). As such, the Draft EIR has considered the range of uses that may occur on the project site and associated traffic and air quality impacts. The subsequent development of each district would be subject to review and approval by the City.

Response 8

The commentor has not provided any information to warrant the conclusion that the project would be detrimental to existing retail in the City of Elk Grove and the region. In fact, the project would not be detrimental to existing retail in the City of Elk Grove or the region. As stated in the Draft EIR,

“According to the BAE analysis, the Sacramento County retail sector is currently quite healthy, with strong demand and low vacancy rates in existing space. In addition, there is a present and growing demand for the construction of a substantial amount of additional retail space while maintaining Sacramento County's overall retail shopping center inventory at a level that is comparable to other similarly-sized metro areas.

The existing population and extensive growth planned for the south Sacramento County area would be capable of supporting the proposed project in the near term (2000 to 2005). While the proposed project may have some potential to compete with existing shopping centers to the north (including Downtown Plaza and Arden Fair Mall), diversion of sales from these centers is not likely to be significant in terms of their continuing economic viability. Other centers located within south Sacramento County should be sufficiently differentiated from the proposed project so as to be able to co-exist in the same trade area. For this reason, it is considered unlikely that economic competition from the proposed project would result in business closures in existing retail and commercial centers such that a physical deterioration in the environment would occur. Based on the above analysis, the proposed project is anticipated to have a less than significant impact

on the physical deterioration of existing commercial uses in the area.” (Draft EIR, page 4.13-5)

Response 9

The City is unaware of reports that the opening of the Roseville Galleria has impacted the business of the other malls in our region by 5 to 10 percent this holiday season. See Response 6 to Letter 13, City of Sacramento, regarding published reports of sales impacts on the Arden Fair and Downtown Plaza Malls after the opening of the Roseville Galleria in the summer of 2000. These reports indicated the effects of the new mall on these two existing competitors was minimal. While numerous retail outlets in the region reported sluggish holiday sales compared to the previous year, this was attributed primarily to a general slow-down in the U.S. economy. The analysis of the projects economic impacts presented in the Draft EIR is considered adequate.