



## PLACER GROUP

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November 16, 2006

Mr. Rodney Campbell  
640 5<sup>th</sup> Street  
Lincoln, CA 95648

**Subject: Comments on the Draft Environmental Impact Report for the  
Draft 2050 Lincoln General Plan Update**

Dear Mr. Campbell,

These comments are on behalf of the 1,900 Sierra Club members in Placer County. We have significant concerns with the degree of urban growth inducement reflected in the DEIR. In viewing figure ES-1, the regional footprint of Lincoln's planning area (45 sq. miles) is as large as the core area of Sacramento, in essence creating sprawl not only for its citizens, but also for inducing growth far north of the Sacramento area. Perhaps the greatest impact related to the DEIR are the planned villages on the north and west side of South Placer County. We are particularly concerned about extending Lincoln's SOI (and ultimate incorporation of the City boundaries) north and south of Wise Road and east of Dowd Road because of the environmental impacts on high value habitat (including vernal pool complexes), prime farmland and riparian corridors along Chamberlain Road (see attached Map 1).

The DEIR fails to fully analyze all the significant impacts of the project and fails to provide feasible mitigation to reduce the environmental impacts to a less than significant level.

The proposed General Plan fails to maintain sense of community and community identity.

The current proposed General Plan (GP) is a sprawling vision with a geographic extent that rivals the largest cities of the Sacramento area. Yet Lincoln lies at the periphery of the metropolitan area. The GP ignores this regional location. It also ignores keeping housing, traffic, and walking patterns close to the downtown. At the expense of open space and agricultural lands, the GP ignores a focus on maintaining a core city center that creates a nucleus for community, including social contact, good pedestrian and bicycle corridors. It ignores the fact that Lincoln's legacy is a farming town.

While the language in the GP document encourages downtown growth, the distance alone between each proposed village demands car or motorized transportation. This plan encourages the formation of several cities rather than a cohesive municipal unit. Cities with viable downtowns, such as Roseville and Rocklin, profess plans to revive the downtowns yet encourage commercial projects, such as Wal-Mart superstores and malls on the periphery, thus diluting the viability of a downtown. These past models are becoming obsolete, not only for traffic and social problems, but also because land is a scarce – a one-time resource not to be squandered on poor planning.

Lincoln GP uses the same obsolete model, with commercial nodes or villages around the city center rather than one center node with spokes of residential development on the periphery. Smart growth and new urbanism designs have better ways to cluster development while maintaining open space. Where is the urban design of this plan? Where is literature and language about new urbanism and smart growth?

Virtually nothing is said about the morphology of the proposed GP, especially in the numerous villages. Rather the plan relies on simple formulas and ratios (residential, open space, commercial and different densities) without geographic placement. Specific plans are lacking and little if any mapped out details of future build-out scenarios.

For example, the City of Cupertino's GP has strategies for clustering people and focusing on key areas for growth, such as "Heart of the City" specific plan done by the City, not developers. A great deal of specific geographic design, including avoidance of critical areas such as habitat or environmentally sensitive areas, is spelled out in the GP document. Floor to area ration such as .25 or .33 times the lot area limit the total building area. Traffic Intensity Performance Standards (known as TIPS) prohibit a development from exceeding a specific vehicular trip rate. The standard limits activities to those that do not exceed 16 one-way trips per acre.

The City failed to provide sufficient opportunity for public input.

Far more general public input is needed given the scope of the proposed SOI expansion. Why has only a steering committee -- with just two citizens among the mix -- been formed? This seems undemocratic, as if the City leaders and staff are attempting to force the General Plan before adequate public comments have been solicited.

Given the scope of this GP and impact to a historically rural community, government officials allowed for an inadequate time frame for public comments. For busy citizens, 30 days (a November 16 due date) is barely enough time to respond to the DEIR of this scope.

We believe the City needs to justify this expansion with widespread, documented public support. The decision needs to be based on a large sample of public input, and the City has a responsibility to educate and encourage public input. This City has already grown 200% in the past few years, and residents are new to the area. Thus the burden of education and encouraging public comment is even more incumbent upon City officials.

Alternative financial models must be examined.

The Economic Development element (Chapter 3) states that the City's consultants have found that a population goal of 120,000 to 130,000 residents is necessary in order to attract large retail outlets which will capture a sufficient share of the region's sales tax revenue to enable a "financially self-sustaining community." This financial model that requires an expansion of residential build-out capacity from 87,600 residents to 131,500 residents is the cause of many of the environmental impacts associated with the project, including the loss of farmland and habitat and in vehicle trip generation and air pollution. In this context CEQA requires that alternative financial models should be analyzed which would satisfy the project goals yet would reduce environmental impacts.

The level of presumed housing demand that needs to be met in General Plan is not documented.

While the housing boom propelled communities surrounding Sacramento into record growth (Rocklin 90%, Roseville 78% and Lincoln 200%), what is the regional trend over the next 20 years? By definition the housing boom cannot be viewed as representing normal growth patterns. Already Lincoln has seen a steep decline in new home sales.

Why are basic and current housing data unavailable in this document? The burden to hunt down a separate housing document is unacceptable for accurate assessment of this GP. Likewise, this GP emphasized far too much housing versus attracting well-paying jobs (to support a family) and corporate centers. We question the validity of the population projections and why new data on the housing market is not incorporated. What are the new population projections and does the City use several sources?

The DEIR fails to analyze all the available means of reducing traffic congestion.

How will people be getting around in 50 years? Certainly by all accounts the vehicle based on fossil fuels will face steep cost challenges. People will require public transportation more than ever -- currently the norm in Western Europe, Argentina and China, for example. Public transportation, pedestrian pathways, and bicycle corridors need to be integrated into the land use section when discussing the villages.

The DEIR fails to provide adequate analysis of impacts to wetlands, habitat and agricultural lands, and fails to provide feasible mitigation for impacts.

Wetlands:

Aside from floodplains, where are the critical wetlands? What type of impact will the impervious cover (IC) have on flows into these wetlands? While storm drain systems may help usher water into the stream system, how are the affects of IC going to impact semi-permanent and seasonal wetlands? Using coefficients with different land uses is inadequate for this type of analysis. Where is the placement of this IC in each of these village and planning units? How much excess run-off will there be, and how will it affect the viability of these seasonal wetland areas, specifically vernal pools and their associated species?

Open Space & Agricultural Lands:

The City of Lincoln's existing GP Sphere of Influence (SOI) covers approximately 33 sq. miles. What is the percent of change from the existing SOI? From the map, it looks like Lincoln's extent more than doubles, a significant increase. Where are the important farmlands? (See Map 1 – from Dept. of Conservation “Important and Prime Farmland”)

More important, where is the actually farmland expected to be destroyed? Where is it expected to remain? Given the mitigation is significant and unavoidable; this destruction of important farmland needs to be mapped out.

What are the important landscape features to avoid, such as 100-year flood plains, Prime Farmland, sensitive and protected species, and high value habitat as determined by the Placer County Conservation Plan (PCCP), which has conducted extensive research over the past 8 – 10 years?

A sampling of sensitive lands is listed below, with attached GIS layers illustrating the extent of these sensitive lands.

Looking at Map 2 (with GIS layers showing: Lincoln Planning Area, vernal pool complexes, FEMA flood plains, Dept. of Conservation Prime Farmland, and PCCP opportunity areas with high habitat value (Placer County's own assessment), note the impacts throughout the peripheral areas.

- 1) To the north and south of Wise Road (Village 3) are extensive prime farmlands, high habitat value, vernal pool complexes and riparian areas.
- 2) West of Dowd (Village 4), are extensive high value habitat and vernal pools. In fact, most of this area is vernal pool complexes.
- 3) North of Moore Road (SUD-B) exist large areas of prime farmland.
- 4) South of Moore Road and to the west of Fiddymment Road (Village 6 and SUD-C) exists a large swath around Auburn Ravine of prime farmland, 100 year floods, and vernal pool complexes adjacent to Fiddymment and north of East Catlett Rd.

Stated quite simply, where are the proposed future developments and how are they going to avoid these areas? Given the importance of avoiding these landscape features listed above, where is a map to show the specific development plan and conservation strategy for the larger regional interest?

How much Important Farmland exists within the proposed Planning Area?  
How much Prime Farmland exists within the proposed Planning Area?

Why does page 4-2 say -- 80 percent of the existing land uses in the City's Planning Area is agricultural (25,740 acres) with half "important Farmland" Additionally, 3540 acres is designated as "Prime Farmland."

The NOP (dated November 2, 2005) says "the Planning Area contains an estimated 6990 acres of important farmland (20% of total Planning Area... [of which] 3220 acres are classified as Prime Farmland."

Yet on page 4-24 (Table 4-21—"Important Farmland" converted by the proposed project says that only 710 acres of "Important Farmland" will be converted. Where is the map to indicate where the Calif. Dept. of Conservation – FMMP 2002 soils are located?

Viability of Agriculture in Western Placer County: Given the tremendous footprint and land use changes of the proposed GP, what are the specific ways to support neighboring farms?

On page 4-25 (OCS-2-3), how can this policy be viable – to support neighboring farms on County lands – when the current GP intends to develop such a vast extent? Is most of the western part of Placer County outside of the GP and floodplain suitable to farming and what kind of farming?

It is difficult to discern the impacts to farmland: This DEIR needs a map that shows GIS layers that have:

1. FMMP important and prime farmlands
2. Existing crops (rice, grazing, etc.)
3. Williamson Act Lands
4. 100 year flood plain and stream system
5. Overlain with subdivision / commercial development

Land Use, Density and Zoning Changes: Citizens need to see the zoning impact of this proposed plan. Placer County current GP designations (80, 40, 20 acre parcels) would radically change to higher dwelling unit densities. Citizens need a map to see Placer County's existing General Plan to compare Lincoln's intended zoning changes.

These large parcels have a purpose as part of the region's master plan. They are consistent with Placer County's GP intended to preserve open space agricultural lands. Yet Lincoln's plan would significantly alter Placer County's GP and the rural nature of the region. How is the Lincoln GP consistent with Placer County's GP?

The DEIR fails to fully analyze the cumulative growth-inducing impacts that the proposed Lincoln GP would have in the region.

Regional Growth Patterns: Where is the expected growth, such as in Yuba and Sutter County, to better understand regional growth patterns? What are the growth inducing impacts of Village 3, 4 and 6? Village 6 adds to the sprawl of Roseville with no Agricultural / Open Space buffers between cities, and the northern Village 4 has even worse growth inducing elements.

The DEIR fails to note that the proposed General Plan would be inconsistent with the Placer County Conservation Plan.

Placer County Conservation Plan (PCCP): "Impact LU-3 could not conflict with the applicable habitat conservation plan or natural community conservation plan."

How has the GP addressed preserving large areas, working with the proposed Placer County Conservation Plan (PCCP), specifically identified in the most recent PCCP documents? You can see from Map 3 – ranked habitat (from a value of 3 to 6 with darkest the highest) that much of the GP used this high ranked habitat.

The City is actively participating in the creation and adoption of the PCCP. Yet this GP ignores the fact that key to the success of this PCCP is the retention of roughly 80 percent of the vernal complexes in order for a viable HCP (Reid & Assoc. from PCCP Exec. Summary, March 2005, p. ES-8). What are the Fish and Wildlife Service's requirements and suggestions (85%)?

This translates to no net loss of these federally protected resources based on the cumulative impacts throughout Placer County. While Lincoln may be disappointed that cities such as Roseville and Rocklin have essentially depleted this resource, they have no entitlements to continued destruction and fragmentation of these seasonal grasslands.

Conflicts with PCCP Strategy: Likewise, large tracts of land or reserves are needed to provide connected landscapes and a viable habitat for listed plants and animals in the PCCP documents. Recent areas delineated within the phase 1 reserve of Western Placer County are known as Conservation Management Units (CMU), such as:

- 1) Lower Auburn (south of Moore Rd., mostly west of Hwy 65)
- 2) Markham (north of Moore to Wise Rd.)
- 3) Lower Coon (west of Hwy 65 and north of Wise Rd.)
- 4) Yankee Slough (east of Hwy 65 and north of Wise Rd.)

All or a portion of these CMUs lie within the Lincoln Plan area, with Lower Auburn, Markham, and Lower Coon major objectives to conserve the grassland resources (see Map 4 – CMU areas).

Lower Auburn alone has 8,438 acres of Vernal Pool Complexes and 16,288 in agriculture. Markham (2,777), Lower Coon (694), and Yankee Slough (2221) have an additional total of 5692 acres. The grand total of Vernal Pool complexes listed above is 14,130 acres, much of which lies within the proposed Lincoln Planning Area.

Yet according to the PCCP Reserve System documents handed out to the Biological Working Group (BWG), of which these commenters are stakeholder members, a minimum of 2500 acre blocks are needed in each of these units. The conservation of grassland / wetland / agricultural in Markham and Lower Coon CMUs, which is in the northwest portion of the Lincoln GP, is critical to a comprehensive PCCP, according to these documents.

Specifically, the area north of Wise Rd (the Lower Coon CMU), provides connectivity with the open space, vernal pool complexes, and wild lands located north in the mitigation areas around Sheridan. Yet this is where SUD-A is proposed.

Village 4 proposes approximately 1400 acres of residential and right of way land use with roughly 1500 open space (OS) and conservation easements (CE), which is directly over the top of a large portion of the Markham CMU (the other “critical” PCCP unit). Where is the 1500 of OS and CE going to be? According to the County maps, most of this area is vernal pool complexes. Is 1500 acres of OS enough, given the critical needs of the PCCP? Conservation maps of the PCCP note that this is an important -- if not essential block -- of needed open space and vernal pools for the PCCP’s success.

The DEIR fails to fully analyze impact to wildlife habitat and anadromous fish, and fails to provide feasible mitigation for impacts.

How has the City worked with the Wildlife Agency to design the least impacts, habitat and buffers, in this area of Village 4? Likewise, how has the City accounted for growth inducing factors eventually adjacent to this proposed SOI? In other words, by extending the SOI within roughly 40 years, the following years will result in even more sprawl into mitigation and recovery areas without buffers. Where are the buffers, if any, going to be located? How is the open space going to be paid (fee title, conservation easements, imposing development mitigation fees, etc.)?

SUD-A, which is a fairly small area relative to village 3 and 4, proposes 140 acres of residential, 70 acres of business park, 510 acres of community commercial, 590 of regional commercial, 140 acres of Industrial and 260 acres for the right of ways. The total 2110 acres subtract 400 for open space. SUD-A is located in the southern portion of the Lower Coon. With such intense development north of the existing airport, how is this going to impact the Lower Coon CMU? How is that going to affect the Coon Creek?

Does Coon Creek have anadromous fish or a history of sea-going fish? How are the likely impacts of Teichert new operations, in conjunction with this proposed development, going to affect the cumulative impact of this stream system? If take is going to occur, land habitat lands must be protected outside of the SOI but within the County. Where is this to occur with such demand for these mitigation lands? How are the cumulative impacts of current projects going to limit the availability of mitigation lands, such as Placer Vineyards, Roseville's SOI projects, Placer Ranch, and the Regional University?

The DEIR fails to provide adequate mitigations for impacts to endangered species and fails to account for the fact that federally designated Critical Habitat is planned for urban development.

Wildlife Agency Restraints: How will Lincoln address the Fish & Wildlife Service Federal Register of Critical Habitat Unit 11? Note 11B is located north of Lincoln's city center and east of Hwy 65 and Unit 11C directly east of Lincoln's city center (see Map 5 – Critical Habitat – Unit 11).

In regard to the PCCP, I would like to include specific comments from the Wildlife Agency dated June of 2005. This letter was sent to Loren Clark, Asst. Planning Director and Placer County lead of the PCCP, with grave concerns about future growth plans, including those of Lincoln.

“A review of aerial photos completed in 2002 indicates approximately 20,000 acres of vernal pool grassland community existed in Placer County at that time. The Agency Review Draft states on page 6-18 that, ‘it is reasonable to estimate that the present extent of valley grassland / vernal pool, and particularly the vernal pool component of it, is probably less than one-quarter of its original extent in the Western Placer Area.’ Yet, the Agency Review Draft includes a proposed Development Opportunity area for Placer County and the City of Lincoln that includes approximately 15,000 acres of vernal pool grassland community. In so doing, the Agency Review Draft contemplates urban development with an area supporting 15,000 acres of the remaining vernal pool grassland in Western Placer County.... This would result in a potential 75% reduction in the biological value of this important community since 2002 and loss of over 85% of the same community from 1937 through the 50-year term of the [HCP] permit. The Wildlife Agencies believe that a loss of vernal pool grassland habitat of this magnitude compromises a sound conservation strategy.”

Lincoln must address the major issue of cumulative impacts on grasslands and seasonal wetlands, especially given its peripheral location to the core greater Sacramento area and its significant impact to a broader conservation plan. How has Lincoln addressed these specific concerns as a participant of the PCCP?

Lincoln must mitigate for impacts to the Vernal Pool Recovery Core Areas in a manner consistent with the Vernal Pool Recovery Plan habitat protection requirements:

The US Fish and Wildlife Service is required to do recovery plans for listed species. Lincoln is within the Southeastern Sacramento Valley vernal pool region and a portion of the new Lincoln sphere would be in the West Placer County Core Area (Sacramento Fish and Wildlife Vernal Pool Recovery Plan, pgs. III-66, III-67). Within the Core Areas, 85% of vernal pool habitat is to be protected (ibid. pg III-94). The EIR should demonstrate that the updated General Plan will avoid 85% of this habitat or fully mitigate for its loss. (See Maps 6, 7 and 8)

The DEIR fails to reveal all the mitigations that will be needed to minimize impacts to wetlands and endangered species.

The proposed General Plan would provide for development projects which will necessitate wetlands permits under Section 404 of the Clean Water Act, a Biological Opinion under Section 7 from USFWS and an approved take permit. These permits should be obtained before proceeding to certify the Final EIR. Otherwise, the mitigation is unknown, speculative and unenforceable through CEQA.

Thank you for the opportunity to comment on the draft EIR for the Lincoln General Plan update. Unfortunately we find the document entirely inadequate in its analysis of the impacts and its failure to provide feasible mitigations.

Sincerely,



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Attachments: eight maps