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November 29, 2000

VIA FACSIMILE AND HAND DELIVERY

Janet Ruggiero
City of Citrus Heights
6237 Fountain Square Drive
Citrus Heights, California 95621

Re: Comments on the Draft Environmental Impact Report for the
Stock Ranch Guide for Development - October 2000
State Clearinghouse No. 2000632089

Dear Janet,

On behalf of John Stock and C & S Properties, we reviewed the Draft Environmental Impact Report (DEIR) for the Stock Ranch Guide for Development. Our comments on the document are set forth below.

1. Page 1.0-3, Section 1.4, Relationship to the General Plan

This section should be updated to reflect the General Plan designations in the General Plan adopted in November. Throughout the document, references to the Draft General Plan should be eliminated and information from the adopted General Plan should be inserted.

II-1

2. Page 1.0-3. Section 1.4, Relationship to the General Plan, fourth paragraph

The fourth line of the paragraph indicates that "Sylvan Commerce DistrictZone" [sic] is a proposed land use within the project. The reference to Sylvan Commerce District should be stricken. Land uses proposed (General Commercial and possibly Medium Density Residential) for this area within the project are already contained in the list.

II-2

3. Page 2.0-6, Summary of Impacts and Mitigation Measures

The description of impacts and proposed mitigation measures contained in this table do not match those contained in the impact and mitigation discussion in Section 4.0. The Final EIR should correct this inconsistency and state that a corrected table was issued to all Draft EIR holders during the public review period.

11-3

4. Page 3-5, Surrounding Uses and Zoning Exhibit and throughout document

This exhibit and others throughout the document should be updated to reflect that the 1.8-acre parcel in the southeast corner of the site is part of the proposed project.

11-4

5. Page 3-10, Project Objectives

This discussion should include a statement that the project objectives listed are those developed by the City Council for the project.

11-5

6. Page 3-12, Project Description, Section 3.7, Project Characteristics

The Project Description introduces two land use scenarios (Scenario 1 - 385,000 square feet and Scenario 2 - 450,000 square feet) for analysis in the EIR, but analysis of the two scenarios is only included in Section 4.4, Transportation and Circulation. In the other sections of the EIR, there is no mention of how Scenarios 1 and 2 compare. The quantitative analysis of the two scenarios should be carried throughout the sections of the EIR.

11-6

Scenario 2 (450,000 square feet) represents the proposed project; Scenario 1 (385,000 square feet) is an alternative. The EIR is required to evaluate the proposed project, which is Scenario 2 (450,000 square feet). If the quantitative analysis of both scenarios is not extended through the other applicable EIR sections, the discussion(s) of Scenario 1 (385,000 square feet) should be relocated from the Transportation and Circulation Section to the alternatives analysis. The discussion of Scenario 2 (450,000 square feet) should be given priority to indicate that it is the proposed project.

11-7

At minimum, the label on the 450,000 square foot alternative should be relabeled as "Scenario 1" to indicate that it is the preferred alternative.

11-8

7. Page 3-16, Section 3.8, Subsequent Approvals

The first paragraph of Section 3.8 on page 3-20 states that the EIR has been developed as a Program Level analysis. An explicit statement that the document is a Program EIR gives the impression that all future actions will require additional environmental analysis.

11-9

8. Section 4.0, Discussions of Project Impacts

The Draft EIR evaluates impacts as if the proposed project consists of rezoning non-urban uses to urban uses. The project site is currently zoned for urban uses including MP, SC, RD-20. The EIR should evaluate the impacts created by the changing land use designations from the existing land use designations (MP, SC, RD-20) to those proposed within the project.

11-10

Impacts of the proposed project should be stated in terms of the incremental change created by the proposed project compared to the impacts anticipated with build-out under existing General Plan/zoning. In the case of traffic, the EIR should include a calculation of trip generation for the existing condition (under existing zoning) and all traffic impacts should be measured against potential impacts associated with the existing condition (under existing zoning).

11-11

The same incremental analysis applies to air quality, noise, biological resources, population, employment and housing and land use. Please provide this comparison in the Final EIR.

11-12

9. Sections 4.1 and 4.3, Land Use and Noise

Throughout the Land Use and Noise Sections, there is extensive discussion of landscape and building setbacks that are proposed as part of the project. In many cases, the landscape and building setbacks are used to justify a finding of less-than-significant impact. The building setbacks listed in the text are not necessarily those proposed as part of the project. Attached is a list of the setbacks proposed for the project.

11-13

10. Page 4.1-3, Adjacent and Surrounding Land Uses

The Alzheimers care facility on Stock Ranch Road is known as Alterra Clare Bridge.

11-14

11. Page 4.1-3, General Plan Designations

Following the discussion of the Existing General Plan Designations for the Project Site and accompanying exhibit, please add a section that discusses the Existing Zoning Classifications for the Project along with an accompanying exhibit. The Existing Zoning Classifications section should discuss the types and sizes (acreage, square footage) that could be constructed on the property with no additional entitlement.

11-15

12. Page 4.1-11, Land Use Impacts

Project impacts are mis-numbered in this section.

11-16

13. Page 4.1-11, Impact 4.1.5 (Impact 4.1.4)

There is no discussion regarding the level of significance for this impact. Please add discussion regarding level of significance for this impact.

11-17

14. Page 4.1-12, Land Use, top of page, discussion section

In the description of the SPA zoning, the first paragraph states that the project will create several zoning designations including two that are unique to the project (Sylvan Commerce District zoning and residential cluster zoning). The project does not include the creation of any new zoning districts. The Sylvan Commerce District will be zoned SPA - General Commercial. Office, commercial and multi-family uses are permitted in the General Commercial zoning.

11-18

The second paragraph of this section indicates that the residential area south of Arcade Creek would be zoned Residential Cluster, which is incorrect. Land south of Arcade Creek will be zoned SPA - Residential. Residential cluster development is an alternative development scenario and is permitted by the City's Zoning Code.

11-19

15. Page 4.1-12, Special Planning Area Land Use Zone

The second paragraph indicates that the Citrus Heights Zoning Code identifies the Stock Ranch planning area as an existing Special Planning Area.

11-20

If this is the case, then some or all of the project site will not require a rezone to Special Planning Area as listed on the list of entitlements on page 3-17.

16. Page 4.2-6, Project Impact on Jobs

Please add a discussion that quantifies the number of jobs that could be created under the project's existing zoning.

11-21

17. Page 4.3-11, Noise Impacts

Some of the impacts and mitigation statements in this section are not numbered sequentially.

11-22

18. Page 4.3-12, Noise Barriers

Zoning Code requires a six-foot perimeter masonry wall within commercial uses adjacent to adjoining residential and recreational zones. Therefore, a six-foot masonry wall is required on the east, west and southern edges of the project.

The noise technical analysis and the discussion contained within the EIR does assume that walls would be included as part of the proposed project as a means to reduce noise levels. Therefore, impacts due to noise are significantly overstated in the Draft EIR, since the discussion assumes that no sound barriers (walls) will be constructed.

11-23

Under the proposed project, masonry walls will be constructed as required by Code, which will result in noise attenuation benefits. Therefore, the setback widths identified in the EIR are not necessary for the purpose of noise attenuation, unless masonry walls are not constructed as required by Code.

In the EIR discussion, the assignment of building and landscape setback widths to attenuate noise is onerous and should be eliminated from the discussion, since the project proposal includes masonry walls.

19. Page 4.4-2, Transportation & Circulation, Existing Setting

This section should include a description of the trip generation characteristics under existing zoning designations. The attached table summarizes applicable ITE trip generation rates for the uses anticipated under existing zoning as well as the assumed yield within each land use category. The total estimates for daily, a.m. and p.m. peak hour trips generated are presented and compared to the estimates contained in the Draft EIR.

11-24

As shown, the total daily trips generated, exclusive of pass-by trips is 16,503 daily trips, while the project considered in the Draft EIR generates 22,423 trips. Because the current zoning includes MP land uses (industrial/office), trip generation during the a.m. peak hour is higher under existing zoning than under the proposed project.

The Final EIR should include a discussion of the trip generation characteristics under existing zoning and quantify the number of "new" trips associated with the proposed project. As written, the discussion in the Draft EIR overstates the number of new trips that would be generated by the proposed project.

The Trip Generation, Distribution and Assignment sections contained later in this section should be revised to reflect trip characteristics associated with existing zoning designations.

20. Page 4.4-9, Project Impacts, Access Plan

The Final EIR should evaluate the revised access plan for the Auburn Commerce District that includes a signalized project access on the western boundary of the project site and two non-signalized driveways in the center and eastern portions of the site. Under the revised access plan, the Auburn Boulevard/Raintree Drive intersection would continue to be a full-access, unsignalized intersection. A "refuge" area would be provided in the median of Auburn Boulevard to allow motorists turning left from Raintree Drive to travel east on Auburn Boulevard to cross on direction of traffic at a time.

11-25

21. Page 4.4-9, Project Impacts

The Final EIR should identify the thresholds of building square footage within the Auburn Commerce District that trigger off-site transportation improvements. Presumably, fewer improvements would be needed if the square footage built within the Auburn Commerce District is less than 450,000. For off-site transportation improvements, please provide a corresponding square footage number that would trigger the need for the improvement.

11-26

November 29, 2000

Page 8

Enclosures

Proposed Landscape and Building Setbacks
Trip Generation Characteristics - Existing Zoning

cc: Henry Tingle
Rhonda Sherman
John Stock
John Pitalo
Deirdre Dawson
Peter Sparre
Jack Mandel

Table 1 Comparison of Trip Generation under Current Zoning with Proposed Project (385 kaf)

Land Use	Amount	Trip Rate			Trips		
		Daily	AM Peak	PM Peak	Daily	AM Peak	PM Peak
Northern Area							
Shopping Center	114,345 sf	64.98	1.51	6.00	7,430	173	686
Industrial Office Park	217,800 sf	11.42	1.93	1.50	2,487	420	326
RD-20 Residential	300 du's	6.63	0.51	0.62	1,989	153	186
Northern Subtotal					11,906	746	1,198
Southern Area							
Industrial Office Park	126,326 sf	11.41	2.11	1.50	1,442	266	180
RD-20 Residential	700 du's	6.63	0.51	0.62	4,641	357	434
Sub-Total Southern Area					6,083	623	624
Total Both Areas					17,989	1,369	1,822
Pass-By Trips					<1,486>	<35>	<240>
Estimate for Proposed Project from DEIR Table 4.4-4					16,503	1,334	1,582
Project as a % of Existing Zoning					22,423	688	2,031
					136%	52%	128%

KDA

Stock Ranch
November 29, 2000

	Listed in Draft Guide for Development		Proposed Project	
	Landscape Setback From back of curb	Building Setback Back of curb to building	Landscape Setback From back of curb	Building Setback Back of curb to building
Roadway				
Auburn Boulevard	50 feet, includes nine foot path	50 feet	25 feet, includes six-foot sidewalk	25 feet
Sylvan Road	None	20 feet	20 feet, including six foot sidewalk	20 feet
Stock Ranch Road	None	20 feet	20 feet, including six foot sidewalk	20 feet

Use	Location	Listed in Draft Guide for Development		Proposed Project	
		Landscape Planter	Building Setback	Landscape Planter	Building Setback
Major Tenants	Adjacent to Residential	20 feet	100 feet	20 feet	100 feet
Major Tenants	Adjacent to San Juan Creek and Arcade Creek	25 feet to floodplain	100 feet to floodplain	10 to 25 feet to floodplain (varies with floodplain line)	45 feet to floodplain
Shops, Pads, Specialty (<30,000 SF)	Adjacent to Residential	20 feet	75 feet	20 feet	75 feet
Minors (30,000 to 65,000 sf)	Adjacent to Residential	20 feet	75 feet	20 feet	65 feet
All Tenants	West side tributary on north side of creek	20 feet	75 feet	10 feet	40 feet