GENERAL PLAN

RANCHO CORDOVA GENERAL PLAN

FINAL ENVIRONMENTAL IMPACT REPORT

FINAL EIR
June 2006

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FINAL ENVIRONMENTAL IMPACT REPORT

FOR

RANCHO CORDOVA GENERAL PLAN

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1.0 – Introduction

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines (Section 15132). The City of Rancho Cordova is the lead agency for the environmental review of the proposed Rancho Cordova General Plan and has the principal responsibility for approving the project. This FEIR assesses the expected environmental impacts resulting from adoption and implementation of the General Plan, as well as responds to comments received on the Draft EIR.

1.1 BACKGROUND AND PURPOSE OF THE EIR

OVERVIEW OF CEQA REQUIREMENTS FOR PREPARATION OF AN EIR

The City of Rancho Cordova (City), serving as the Lead Agency, has prepared this EIR to provide the public and responsible and trustee agencies with information about the potential environmental effects of the proposed General Plan. As set forth in the provisions of CEQA and implementing regulations, public agencies are charged with the duty to consider the environmental impacts of proposed development and to minimize these impacts where feasible while carrying out an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

State CEQA Guidelines Section 15121(a) states that an EIR is an informational document for decision-makers and the general public that analyzes the significant environmental effects of a project, identifies possible ways to minimize significant effects, and describes reasonable alternatives to the project that could reduce or avoid its adverse environmental impacts. Public agencies with discretionary authority are required to consider the information in the EIR, along with any other relevant information, in making decisions on the project.

CEQA requires the preparation of an environmental impact report prior to approving any project, which may have a significant effect on the environment. For the purposes of CEQA, the term "project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). With respect to the proposed Rancho Cordova General Plan, the City has determined that the proposed development is a "project" within the definition of CEQA.

BACKGROUND OF ENVIRONMENTAL REVIEW PROCESS OF THE PROJECT

The following is an overview of the environmental review process for the Rancho Cordova General Plan that have led to the preparation of this FEIR.

Notice of Preparation and Initial Study

In accordance with Section 15082 of the State CEQA Guidelines, the City prepared a Notice of Preparation (NOP) of an EIR for the proposed project on February 25, 2005. The City was identified as the Lead Agency for the proposed project. This notice was circulated to the State Clearinghouse and to the public, local, state, and federal agencies, and other interested parties to solicit comments on the proposed project. The NOP was posted on the City's website. A scoping meeting was held on March 9, 2005, to receive additional comments. Concerns raised in response to the NOP were considered during preparation of the Draft EIR. The NOP and responses by interested parties are presented in Appendix 1.0 of the Draft EIR. An Initial Study for the project was prepared and released for public review along with the NOP. Its conclusions supported preparation of an EIR for the project. The Initial Study is also included in Appendix 1.0 of the Draft EIR.

Draft EIR

The Draft EIR (DEIR), which consisted of two volumes, was released for public and agency review on March 13, 2006. As a result of the identification and correction of minor errors with the production of the Draft EIR, the comment period was initially extended to May 4, 2006. At the March 28, 2006 General Plan Workshop, the Rancho Cordova City Council further extended the Draft EIR public comment period to May 15, 2006 as a result of a written request to extend the comment period.

The DEIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives. The Draft EIR was provided interested public agencies and the public and was made available for review at Rancho Cordova City Hall and the City's website.

Final EIR

The City received 29 comment letters from agencies, interest groups and the public regarding the Draft EIR. This document responds to the written comments received as required by CEQA. This document also contains minor edits to the Draft EIR, which are included in Section 4.0 (Minor Revisions to the Draft EIR). This document constitutes the FEIR.

Certification of the Final EIR/Project Consideration

The City will review and consider the FEIR. If the City finds that the FEIR is "adequate and complete", the City may certify the FEIR. The rule of adequacy generally holds that the EIR can be certified if: 1) it shows a good faith effort at full disclosure of environmental information; and 2) provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the City may take action to adopt, revise, or reject the proposed Rancho Cordova General Plan. A decision to adopt the General Plan would be accompanied by written findings in accordance with State CEQA Guidelines Section 15091 and Section 15093. Public Resources Code Section 21081.6 also requires lead agencies to adopt a reporting and mitigation monitoring and reporting program to describe measures that have been adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.

1.2 TYPE OF DOCUMENT

The State CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a Program EIR pursuant to CEQA Guidelines Section 15168. According to Section 15168:

> *A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:*
>
> *(1) Geographically,*

(2) As logical parts in the chain of contemplated actions,

(3) In connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program, or

(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The program-level analysis considers the broad environmental effects of the overall proposed General Plan. This EIR will be used to evaluate subsequent projects and activities under the proposed General Plan. Additional environmental review under CEQA will be required and would be generally based on the subsequent project's consistency with the General Plan and the analysis in this EIR, as required under CEQA. When individual projects or activities under the General Plan are proposed, the City would be required to examine the projects or activities to determine whether their effects were adequately analyzed in the program EIR (State CEQA Guidelines Section 15168). If the projects or activities would have no effects beyond those analyzed in this EIR, no further CEQA compliance would be required.

1.3 INTENDED USES OF THE EIR

This EIR is intended to evaluate the environmental impacts of the project to the greatest extent possible. This EIR should be used as the primary environmental document to evaluate all subsequent planning and permitting actions associated with projects in the City that are consistent with the General Plan. Subsequent actions that may be associated with the proposed General Plan are identified in Section 3.0 (Project Description) of the Draft EIR.

1.4 ORGANIZATION AND SCOPE OF THE FINAL EIR

This document is organized in the following manner:

SECTION 1.0 - INTRODUCTION

Section 1.0 provides an overview of the EIR process to date and what the FEIR is required to contain.

SECTION 2.0 - EXECUTIVE SUMMARY

Section 2.0 includes an updated Executive Summary that provides a brief project description and presents a summary table of probable environmental effects edited as a result of comments received on the DEIR and minor staff edits.

Section 3.0 - COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Section 3.0 provides a list of commenters, copies of written comments (coded for reference) and the responses to those written comments made on the Draft EIR.

SECTION 4.0 – MINOR REVISIONS TO THE DRAFT EIR

This section consist of revisions to the Draft EIR that are a result of responses to comments, as well as minor staff edits that do not change the intent or content of the analysis or mitigation measures. Revisions appear in ~~strikethrough~~ and <u>underline</u>.

2.0 – Executive Summary

This section provides an overview of the proposed City of Rancho Cordova General Plan (the "proposed project") and the environmental analysis of the proposed project. For additional detail regarding specific issues, please consult the appropriate chapter of Draft EIR Sections 4.1 through 4.13 (Environmental Setting, Impacts, and Mitigation Measures).

2.1 PURPOSE AND SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

This Environmental Impact Report (EIR) will provide, to the greatest extent possible, an analysis of the potential environmental effects associated with the implementation of the General Plan, pursuant to the California Environmental Quality Act (CEQA).

This EIR analysis focuses upon potential environmental impacts that could arise from implementation of the General Plan through development of the land uses within the Planning Area, as regulated and guided by General Plan policies and action items. The EIR adopts this approach in order to provide a credible worst-case scenario of the impacts resulting from project implementation.

2.2 PROJECT CHARACTERISTICS

The City of Rancho Cordova incorporated in July of 2003 and adopted the Sacramento County General Plan and corresponding land use map. Now that the City of Rancho Cordova is incorporated, the City must formulate and adopt a new General Plan that will act as the official policy statement of the City and guide public and private development in the City as well as the preservation of existing natural resources (Government Code Section 65360). The City of Rancho Cordova commenced the preparation of a General Plan in May 2004.

The proposed City of Rancho Cordova General Plan is comprised of a Land Use Map (see Draft EIR Section 3.0, Project Description) and policy document that contains twelve "policy" elements. Each of the elements identifies goals and associated policies and action items, with the general intent to assist and promote the development of the ideas and desires established in the Rancho Cordova Vision Book for the City, adopted by the City Council on August 2, 2004, and thereby made a part of the City's interim General Plan. A brief description and goals for each element are as follows:

LAND USE ELEMENT

The purpose of the Land Use Element is to describe existing and future land use activity in the City. The Element identifies the distribution, location, and intensity of all land use types throughout the City.

- Balance of land uses (Goal LU.1)
- Smart Growth development (Goal LU.2)
- Rancho Cordova as a destination place and leader in the region (Goal LU.3)
- City input on land use, circulation and park decisions (Goal LU.4)
- Redevelopment of existing areas (Goal LU.5)
- Planning Area development consistent with City vision (LU.6)

URBAN DESIGN ELEMENT

The Urban Design Element provides policies and design concepts regarding the form and character of new private development (and public improvements) along with focused plans for areas of the City in need of special design attention.

- Development consistent with the City Building Blocks (Goal UD.1)
- Create a new City identity (Goal UD.2)
- Project identity that contributes to the district and City (Goal UD.3)
- Projects designed in keeping with surrounding development (Goal UD.4)

ECONOMIC DEVELOPMENT ELEMENT

This Element is an optional element included in the General Plan so the City's officials can continue to improve the City's prosperity, maintain competitiveness, ensure accessibility to its assets, make sure the market is aware of the City's opportunities, and set fair and equitable rules for development.

- Diversify the economy (Goal ED.1)
- Encourage a wide range of businesses (Goal ED.2)
- Create a Downtown (Goal ED.3)
- Create a convention center (Goal ED.4)
- Establish a redevelopment strategy (Goal ED.5)
- Revitalize existing businesses (Goal ED.6)
- Promote infill (Goal ED.7)
- Attract a balance of businesses (Goal ED.8)

HOUSING ELEMENT

The Housing Element is a comprehensive statement by the City of Rancho Cordova of its current and future housing needs at all income levels.

- Balance Employment and Housing (Goal H.1)
- Neighborhood Preservation and Rehabilitation (Goal H.2)
- Revitalize Existing Multi-Family (Goal H.3)
- Encourage Housing Opportunities (Goal H.4)
- Promote Homeownership (Goal H.5)
- Pursue Sustainable Design (Goal H.6)
- Pursue Housing Resources (Goal H.7)

CIRCULATION ELEMENT

The Circulation Element identifies the components of the City-wide circulation system and their general location and role within the community.

- Future roadway system that meets the City's needs and desires (Goal C.1)
- Safe and attractive pedestrian and bicycle network (Goal C.2)
- Great public transit (Goal C.3)
- Air and rail transportation (Goal C.4)
- A fully funded circulation system (Goal C.5)
- A properly maintained circulation system (Goal C.6)

OPEN SPACE, PARKS AND TRAILS ELEMENT

This Element provides goals, policies, and actions intended to achieve the City's vision for open spaces that are accessible to the community. The Element also considers the relationship of open space mitigation lands adjacent to urban lands.

- World-class Parks and Recreation Programs (Goal OSPT.1)
- Connected System of Open Space (Goal OSPT-2)
- Safe and Continuous Pedestrian and Bicycle Trails (Goal OSPT-3)
- Actively Create and Maintain Trails and Open Space (Goal OSPT-4)

INFRASTRUCTURE, SERVICES, AND FINANCE ELEMENT

The Infrastructure, Services, and Finance Element works in combination with the Land Use Element to identify feasible funding options to ensure the provision of infrastructure and public services in a timely manner to accommodate the development envisioned and associated land uses proposed under the General Plan.

- Fiscally Sound City (Goal ISF.1)
- Timely Provision of Quality Infrastructure (Goal ISF-2)
- Local Services for Local Needs (Goal ISF-3)
- Provide Education Options (Goal ISF-4)

NATURAL RESOURCES ELEMENT

The management and protection of the many biological resources, creek corridors, storm drainage, hydrology, water supply and quality, geology and mineral resources, agriculture, and the consumption of energy are the focus of the Natural Resources Element.

- Preserve and protect diverse habitats (Goal NR.1)
- Preserve natural wetlands (Goal NR.2)
- Maintain creek corridors (Goal NR.3)
- Plant and preserve high-quality trees (Goal NR.4)
- Protect quantity and quality of water (Goal NR.5)
- Extraction of mineral resources (Goal NR.6)
- Reduce energy consumption (Goal NR.7)
- Promote waste reduction (Goal NR.8)

CULTURAL AND HISTORIC RESOURCES ELEMENT

This Element seeks to identify and protect areas, sites, and buildings having architectural, historical or cultural significance. The Element provides goals, policies and actions designed to foster preservation of historic resources in the City.

- Identify and preserve history of Rancho Cordova (Goal CHR.1)
- Highlight, preserve and acknowledge the cultural diversity (Goal CHR.2)
- Enhance the quality of life in Rancho Cordova by promoting cultural/performing arts (Goal CHR.3)

SAFETY ELEMENT

The Safety Element discusses the human and natural safety concerns in the City. The Safety Element works in conjunction with the Infrastructure, Services and Finance Element and the Land Use Element.

- Safe Community for All (Goal S.1)
- Minimize Flood Hazards for Urban Uses (Goal S.2)
- Minimize Seismic Hazards for Residents and Employees (Goal S.3)

- Safe Railroad Crossings (Goal S.4)
- Minimize Risks of Toxic/Hazardous Substance Release (Goal S.5)
- Design Safe Neighborhoods (Goal S.7)
- Maintain Effective Law Enforcement (Goal S.8)
- Reduce Risk to Structures (Goal S.9)

AIR QUALITY ELEMENT

This Element provides goals, policies, and actions to improve air quality in the region. This Element emphasizes the effect that land use patterns and resulting transportation behavior have on air quality.

- Ensure a health community (Goal AQ.1)
- Improve air quality through land use (Goal AQ.2)
- Support multiple forms of transportation (Goal AQ.3)
- Support energy conservation (Goal AQ.4)
- Promote educational efforts (Goal AQ.5)

NOISE ELEMENT

This Element defines acceptable noise levels in different areas of the City (residential, office, industrial, etc.) and how those levels will be achieved.

- New Development Free of Noise Disturbances (Goal N.1)
- Mitigate Existing Noise Disturbances (Goal N.2)

2.3 PROJECT ALTERNATIVES SUMMARY

State CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the project, which could feasibly attain the basic objectives of the project and avoid and/or lessen the environmental effects of the project. Further, the CEQA Guidelines Section 15126.6(e) requires that a "no project" alternative be evaluated in an EIR. This alternatives analysis provides a comparative analysis between the project and the selected alternatives. In conjunction with the proposed General Plan Land Use Policy Map, the Draft EIR qualitatively evaluates the following other land use alternatives, which include (see Section 6.0 of the Draft EIR):

- ***ALTERNATIVE 1 – Sacramento County General Plan Alternative (No Project Alternative):*** Under this alternative, the proposed Rancho Cordova General Plan and its associated Land Use Policy Map would not be adopted and the City would revert to the Sacramento County General Plan (Land Use Map and policy document) that was initially adopted by the City upon incorporation as modified by recently approved General Plan amendments (Sunrise-Douglas Community Plan, Sunridge Specific Plan, Villages of Zinfandel, and Capital Village). This would also include the utilization of the transportation improvements identified in the Sacramento County General Plan Transportation Plan (also as modified by recently adopted General Plan amendments [Sunrise-Douglas Community Plan]).

- ***Alternative 2 – Existing City Boundary General Plan Alternative (No Project Alternative):*** Under this alternative, the proposed City of Rancho Cordova General Plan (Land Use Map and policy document) would only be implemented within the existing City boundaries and existing sphere of influence. The Sacramento County General Plan would guide development in regions of the Planning Area outside of the City. The Grant Line West and

Westborough Planning Area conceptual land use plans would be modified. The City's Circulation Plan would only be implemented within the existing city limits and sphere of influence.

- ***Alternative 3 – Natural Resources Conservation Alternative:*** This alternative would generally consist of the same land use concept associated with the proposed General Plan. However, this Alternative modifies the conceptual land plans for several of the Planning Areas to provide further protection of wetland resources and associated habitats. Development potential lost from these modifications were re-allocated where it was consistent with the land use concepts of the proposed General Plan. All other aspects of the proposed General Plan would remain under this alternative (General Plan land use mapping for other portions of the Planning Area and the proposed Roadway System Map).

- ***Alternative 4 – Sacramento Area Council of Governments Preferred Blueprint Scenario Alternative:*** This alternative would be based on SACOG's Preferred Blueprint Scenario for the City of Rancho Cordova Planning Area, including the circulation plan. Implementation of the SACOG Blueprint Plan would accommodate population growth to a higher degree but would provide less capacity for housing units and potential places of employment than the proposed General Plan.

2.4 AREAS OF CONTROVERSY

The City of Rancho Cordova was identified as the Lead Agency for the proposed project. In accordance with Section 15082 of the State CEQA Guidelines, the City of Rancho Cordova prepared and distributed a Notice of Preparation (NOP) for the Rancho Cordova General Plan that was circulated for public review on February 25, 2005. The NOP included a summary of probable effects on the environment from the implementation of the project. Written comments received in response to the NOP were considered in the preparation of the EIR. The issues raised included: impacts to Caltrans facilities, capacity of and setback from the Keifer landfill, safety concerns associated with design, protection of agriculture, wetlands, fish and wildlife resources, sewer capacity, water supply and coordination with the Water Forum agreements, wildland fire potential, impacts from operation of Mather Airport, consistency of the tunnel for Mather Field with the County Transportation Plan and Mather Field Specific Plan, and coordination of planning with the County of Sacramento. Draft EIR Section 1.0 (Introduction) provides a summary of issues and areas of concern related to the proposed General Plan and the Draft EIR, presented to the City by agencies and the public during the NOP review period. The complete text of the NOP and NOP comments are included as Appendix 1.0 to the Draft EIR. It should be noted that subsequent to receiving traffic-related comments on the NOP from Caltrans, representatives from the City met with Caltrans on December 13, 2005 and determined that the following analyses should be done for U.S. 50:

- Use of the Highway Capacity Manual (HCM) peak hour analyses on the freeway mainline only.

- Identification of ramp capacities during peak hours to aid in determining the ultimate number of lanes on the freeway ramps.

- Presentation of six-hour peak volumes (three hour morning peak and three hour evening peak) on Caltrans facilities.

- No merge/diverge/weave analyses at the freeway ramps, and no ramp terminal analyses.

Subsequent to the close of the public review period for the NOP, the Rancho Cordova City Council held a number of public meetings to further refine the policies, actions and land use designations associated with the General Plan. The following additional environmental topics were discussed during such meetings, all of which are addressed in the Draft EIR:

- Existing mining operations in the Rio del Oro, Grant Line West, and East Planning Areas. The desire to reduce development in the Jackson and other southern and eastern Planning Areas to preserve and protect more vernal pools. Land that contains vernal pools should not be used as mitigation land for Swainson's hawk foraging habitat, even if the land that would be impacted by development contains vernal pools.

- The South Sacramento Habitat Conservation Plan (SSHCP) may eventually delineate areas as wetland/vernal pool preserves that could conflict with Sunrise Douglas Community Plan and Sunridge Specific Plan land uses, as well as the proposed General Plan.

- City could develop its own Habitat Conservation Plan (HCP) or join the South Sacramento HCP to avoid needing to obtain project-by-project Federal and State Endangered Species permits and achieve a better planned/managed preserve system that can be worked into the overall planning approach in Planning Areas that contain biological resources.

- Phasing of traffic improvements and development in the southern portion of the City, to relieve traffic conditions along Sunrise Boulevard.

- City park and open space standards.

As identified in Section 3.0 of this document, the City received 29 comment letters on the Draft EIR. Common issues identified in these comment letters include the following:

- Concerns regarding the adequacy of the General Plan policy and action item language to protect natural resources in the Planning Area.

- Traffic impacts to local and regional roadways as well as the state highway system (i.e., State Route 16 and U.S. Highway 50).

- Concerns regarding the adequacy of water supply planning for the entire Planning Area for the City of Rancho Cordova General Plan and associated consideration of environmental effects.

- Impacts to existing habitat conditions (vernal pool and vernal pool grassland habitats) and the lack of larger-scale habitat conservation planning as part of the General Plan.

- Failure to adequately address significant environmental effects to special-status plant and wildlife species that occur or potentially occur in the Planning Area for the City of Rancho Cordova General Plan.

- Concerns regarding the length of the public comment period on the Draft EIR.

- Various input and suggested edits on the language of General Plan policies and action items.

2.5 SUMMARY OF ENVIRONMENTAL IMPACTS

Table 2.0-1 displays a summary of impacts for the proposed General Plan Land Use Policy Map, City of Rancho Cordova General Plan policies and action items, and proposed mitigation measures that would avoid or minimize potential impacts. In the table, the level of significance is indicated both before and after the implementation of each mitigation measure.

For detailed discussions of all mitigation measures and of proposed General Plan policies and action items that would provide mitigation for each type of environmental impact addressed in this EIR, refer to the appropriate environmental topic section in the Draft EIR (i.e., Sections 4.1 through 4.13). Minor edits to the impact and mitigation measures identified in the Draft EIR as a result responding to comments on the Draft EIR as well as staff-initiated edits are shown in Table 2.0-1 in underline (for added text) and ~~strikeout~~ (for deleted text).

TABLE 2.0-1
EXECUTIVE SUMMARY TABLE

Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Land Use					
Impact 4.1.1	Implementation of the Rancho Cordova General Plan would not result in the physical division of established communities because the General Plan was designed to focus on redevelopment of existing urbanized areas and siting new development in vacant portions of the Planning Area, rather than developing in a way that might divide established communities. The "building block" concept in the proposed General Plan, and relevant policies and action items, would ensure that such division does not occur.	Policies: LU.1.4, LU.2.2, LU.4.1, LU.4.2, LU.4.4, LU.4.9, ED.1.1, UD.4.3 Action Items: LU.1.4.1, LU.1.4.2, LU.1.4.3, LU.1.4.4, LU.1.4.5, LU.2.2.1, LU.4.1.1, LU.4.1.2, LU.4.2.1, LU.4.4.1, ED.1.1.1, ED.1.1.2, UD.4.3.3, UD.4.3.4	LS	None Required	LS
Impact 4.1.2	Implementation of the General Plan could result in incompatibilities or conflicts between existing and future land uses in the Planning Area, including land located outside of the Rancho Cordova city limits. However, implementation of policy provisions of the General Plan would reduce this potential impact to **less than significant** impact.	Policies: LU.1.4, LU.2.3, LU.2.6, LU.3.3, LU.3.5, LU.3.8, LU.3.9, NR.6.1, ED.1.1, ED.1.3, UD.1.6, UD.2.3, UD.3.3, UD.4.2, UD.4.3, UD.4.4 Action Items: LU.1.4.1, LU.1.4.2, LU.1.4.3, LU.1.4.4, LU.1.4.5, LU.2.6.1, LU.3.3.1, NR.6.1.1, NR.6.1.2, NR.6.1.3,	LS	None Required	LS

S - Significant
PS-Potentially Significant
LS – Less Than Significant
CS – Cumulative Significant
SU – Significant and Unavoidable
B - Beneficial

Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
		ED.1.1.1, ED.1.1.2, ED.1.3.1, ED.1.3.2, UD.2.3.1, UD.2.3.2, UD.2.3.3, UD.3.3.1, UD.3.3.2, UD.3.3.3, UD.3.3.4, UD.4.2.1, UD.4.3.3, UD.4.3.4, UD.4.4.2			
Impact 4.1.3	Implementation of the proposed General Plan has the potential to conflict with applicable land use plans, policies or regulations of agencies with jurisdiction over parts of the Planning Area that provide for environmental protection.	Policies: LU.2.4, LU.3.3, LU.3.4, LU.3.5, LU.3.11 Action Items: LU.2.4.1, LU.3.3.1	S	None Available	SU
Impact 4.1.4	The Rancho Cordova General Plan has the potential to conflict with the South Sacramento Habitat Conservation Plan, which is the only applicable habitat conservation plan in the Planning Area.	Policies: NR.1.1, NR.1.2, NR.1.3, NR.1.4, NR.1.5 , NR.2.1, NR.2.2, NR.2.3, NR.2.4, NR.3.1, NR.3.2, NR.3.3, NR.3.4, *NR.4.1, NR.4.2, NR.4.3, NR.5.1, NR.5.2, NR.5.3, NR.5.4, NR.5.5* Action Items: NR.1.1.1, NR.1.2.1, NR.1.3.1, NR.1.4.1,	LS	None Required	

S - Significant
PS-Potentially Significant
LS – Less Than Significant
CS – Cumulative Significant
SU – Significant and Unavoidable
B - Beneficial

Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
		NR.2.2.1, NR.2.4.1, NR.2.4.2, NR.3.2.1, NR.3.2.2, NR.3.3.1, NR.3.4.1, NR.3.4.2, *NR.3.4.3, NR.4.1.1, NR.4.1.2, NR.4.1.3, NR.4.2.1,* NR.4.2.2, NR.4.2.3, NR.4.3.1, *NR.4.3.2,* NR.4.3.3, *NR.4.3.4, NR.5.1.1, NR.5.1.2,* NR.5.1.3, , *R.5.2.1, NR.5.2.2,* NR.5.3.1, NR.5.3.2, NR.5.3.3, *NR.5.4.1, NR.5.4.2,* NR.5.4.3, NR.5.5.1, NR.5.5.2, NR.5.5.3, *NR.5.5.4*				
Impact 4.1.5	When considered with existing, proposed, planned and approved development in the region, implementation of the Rancho Cordova General Plan has the potential to result to contribute cumulative land use conditions in the region that result in significant impacts to the physical environment.	Policies: LU.2.4, LU.3.3, LU.3.4, LU.3.5, LU.3.11 Action Items: LU.2.4.1, LU.3.3.1	CC	None Available		SU
Agriculture						
Impact 4.2.1	Implementation of the proposed General Plan would result in the loss of important farmlands (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, etc) as designated by the Farmland Mapping and Monitoring Program.	Policy: UD.2.3 Action Item: UD.2.3.1	S	MM 4.2.1a	The following shall be added as policies to the Land Use Element under Goal LU.1: While agricultural uses are anticipated to be phased out within the City Limits, the City recognizes the right of these uses to continue as	SU

S - Significant
PS-Potentially Significant
LS – Less Than Significant
CS – Cumulative Significant
SU – Significant and Unavoidable
B - Beneficial

Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
				long as individual owners/farmers desire. The City shall require development to protect one acre of existing farmland of equal or higher quality for each acre of Prime Farmland, Unique Farmland or Farmland of Statewide Importance that would be converted to non-agricultural uses. This protection may consist of the establishment of farmland conservation easement, farmland deed restriction, or other appropriate farmland conversion in perpetuity, but may also be utilized for compatible wildlife conservation efforts. The farmland to be preserved shall be located within Sacramento County and must have adequate water supply to support agricultural use. As part of the consideration of land areas proposed to be protected, the City shall consider the benefits of preserving farmlands in proximity to other protected lands.	
			MM 4.2.1b	The following shall be added an action item to the Land Use Element under Goal LU.1: The City shall ensure that the following standards are met regarding agricultural conservation easement content: • Provisions of an accurate legal document that prohibits any	

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
				activity that substantially impairs or diminishes the agricultural productivity of the land. • Protection of any existing water rights necessary to maintain agricultural uses and retain such water rights for on-going use on the agricultural land. • Interests in the agricultural land shall be held in trust by an entity acceptable to the City and/or the City in perpetuity.	
Impact 4.2.2	Implementation of the proposed General Plan could result in the placement of urban uses adjacent to agricultural uses within and adjacent to the City.	Policies: LU.1.4, LU.2.1, UD.2.3, UD.4.2 Action Items: LU.1.4.3, LU.1.4.4, LU.1.4.5, LU.2.1.1, UD.2.3.1	S	None Available	SU
Impact 4.2.3	Implementation of the proposed General Plan could result in a conflict with existing Williamson Act contracts.	Policies: UD.2.3 Action Items: LU.1.4.4, LU.1.4.5, UD.2.3.1	S	None Available	SU
Impact 4.2.4	Implementation of the General Plan Land Use Map Book along, with other proposed development in Sacramento County, would contribute to the additional conversion of important farmlands to other uses and may increase agriculture/urban interface conflicts.	Policies: UD.2.3, LU.1.4, LU.2.1, LU.1.5, UD.2.3, UD.2.3, UD.4.2 Action Items: LU.1.4.3, LU 1.4.4, LU 1.4.5, LU.2.1.1,	CC	~~None Available~~ Implement mitigation measures MM 4.2.1a and b.	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
		UD.2.3.1			
Population Housing and Employment					
Impact 4.3.1	Implementation of the proposed General Plan Land Use Map would include land uses that promote the increase in population, housing, and employment to the area, and thus induce substantial growth.	Policies: H.1.2, H.1.5, H.2.2, H.2.4, H.2.5, H.2.6, H.2.7, H.3.2, H.4.1, H.6.2, H.6.3, LU.1.3, LU.1.4, LU.2.3, LU.2.4, LU.2.7, LU.4.1 Action Items: H.2.2.2, H.2.5.1, H.2.5.2, LU.1.4.1, LU.2.7.1, LU.2.7.2	S	None Available	SU
Impact 4.3.2	Implementation of the General Plan may result in the displacement of housing and/or persons due to the construction of infrastructure necessary to serve new development or revitalization efforts.	No Applicable Policies or Actions	LS	None Required	LS
Impact 4.3.3	Buildout in the planning area, under the proposed General Plan Land Use Map, would include substantial population, housing unit and employment increases.	Policies: H.1.2, H.1.5, H.2.2, H.2.4, H.2.5, H.2.6, H.2.7, H.3.2, H.4.1, H.6.2, H.6.3, LU.1.4, LU.2.3, LU.2.4, LU.2.7, LU.4.1 Action Item: H.2.2.2, H.2.5.1, H.2.5.2, LU.1.4.1, LU.2.7.1, LU.2.7.2	CC	None Available	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
Hazards and Human Health						
Impact 4.4.1	Implementation of the General Plan would include the routine transportation of hazardous materials on Planning Area roadways.	Policies: S.1.1, S.5.4, S.5.5, S.5.6 Action Item: S.1.1.1, S.5.4.1, S.5.4.2, S.5.5.1, S.5.5.2, S.5.6.1, S.5.6.2	LS	None Required		LS
Impact 4.4.2	The Planning Area consists of land uses having the potential to result in an increased risk of release of hazardous materials.	Policies: LU.1.4, NR.8.1, S.1.1, S.1.3, S.5.1, S.5.2, S.5.1, S.5.3, S.5.4, S.5.5 Action Items: LU.1.4.3, LU.1.4.4, NR.8.1.6, S.1.1.1, S.1.3.1, S.5.2.1, S.5.3.1, S.5.3.2, S.5.3.3, S.5.4.1, S.5.4.2, S.5.5.1, S.5.5.2 Goals: S.5	PS	MM 4.4.2	The following shall be added as a policy to the Safety Element under Goal SA.1: The City shall require written confirmation from applicable local, regional, state, and federal agencies that known contaminated sites have been deemed remediated to a level appropriate for land uses proposed prior to the City approving site development or provide an approved remediation plan that demonstrates how contamination will be remediated prior to site occupancy. This documentation will specify the extent of development allowed on the remediated site as well as any special conditions and/or restrictions on future land uses.	LS

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 4.4.3	Implementation of the proposed General Plan would locate development within an airport land use plan, potentially resulting in a safety hazard for people residing or working in the area.	Policies: LU.3.3, LU.3.5	LS	None Required	LS
Impact 4.4.4	Implementation of the proposed General Plan could impair implementation of or physically interfere with the Sacramento County Multi-Hazard Disaster Plan (SCMDP).	No Applicable Policies or Actions	LS	None Required	LS
Impact 4.4.5	Persons could be exposed to contaminated soil or groundwater during development of previously contaminated sites or sites undergoing remediation.	Policies: LU.1.4, NR.8.1, S.1.1, S.1.3, S.5.1, S.5.2, S.5.1, S.3, S.5.4, S.5.5 Action Items: LU.1.4.3, LU.1.4.4, NR.8.1.6, S.1.1.1, S.1.3.1, S.5.2.1, S.5.3.1, S.5.3.2, S.5.3.3, S.5.4.1, S.5.4.2, S.5.5.1, S.5.5.2 Goals: S.5	LCC	None Required	LS
Transportation and Circulation					
Impact 4.5.1	Implementation of the proposed General Plan would result in an increase in traffic volumes that would result in deficient level of service conditions in year 2030.	Policies: C.1.2 Action Items: C.1.2.1, C.1.2.2	S	None Available	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 4.5.2	Implementation of the proposed General Plan would exacerbate unacceptable operations on eastbound and westbound U.S. 50 during the a.m. and p.m. peak hours.	Policies: C.5.1, C.5.2, C.5.3 Action Items: C.5.3.1, C.5.3.2	S	None Available	SU
Impact 4.5.3	Implementation of the proposed General Plan would result in an increase in traffic volumes, which could increase the potential opportunities for safety conflicts as well as potential conflicts with emergency access.	Policies: C.5.1, C.5.2, C.5.3 Action Items: C.5.3.1, C.5.3.2	LS	None Required	LS
Impact 4.5.4	Implementation of the proposed General Plan would result in an increase in the demand for public transit service (e.g., bus and light rail service).	Policies: C.3.1, C.3.2, C.3.3, C.3.4 Action Items: C.3.1.1, C.3.1.2, C.3.1.3, C.3.1.4, C.3.1.5, C.3.2.1, C.3.3.1, C.3.4.1	LS	None Required	LS
Impact 4.5.5	Implementation of the proposed General Plan would result in an increase in the demand for pedestrian and bicycle infrastructure.	Policies: C.2.1, C.2.2, C.2.3, C.2.4, C.2.5, C.2.6, C.2.7, C.2.8, C.2.9 Action Items: C.2.4.1, C.2.4.2, C.2.5.1, C.2.5.2, C.2.5.3, C.2.5.4, C.2.5.5, C.2.5.6, C.2.7.1, C.2.7.2, C.2.8.1, C.2.8.2, C.2.8.3, C.2.8.4, C.2.8.5, C.2.8.6,	LS	None Required	LS

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
		C.2.8.7, C.2.8.8, C.2.8.9 Goals: C.2			
Impact 4.5.6	When considered with existing, proposed, planned and approved development in the region, implementation of the Rancho Cordova General Plan would contribute to cumulative traffic volumes in the region that result in significant impacts to level of service and operations.	Policies: C.5.1, C.5.2, C.5.3 Action Items: C.5.3.1, C.5.3.2	CC	None Available	SU
Impact 4.5.7	Implementation of the proposed General Plan would contribute to the cumulative demand for public transit service (e.g., bus and light rail service).	Policies: C.3.1, C.3.2, C.3.3, C.3.4 Action Items: C.3.1.1, C.3.1.2, C.3.1.3, C.3.1.4, C.3.1.5, C.3.2.1, C.3.3.1, C.3.4.1	LCC	None Required	LCC
Impact 4.5.8	Implementation of the proposed General Plan would contribute to cumulative demands for pedestrian and bicycle infrastructure.	Policies: C.2.1, C.2.2, C.2.3, C.2.4, C.2.5, C.2.6, C.2.7, C.2.8 , C.2.9 Action Items: C.2.4.1, C.2.4.2, C.2.5.1, C.2.5.2 , C.2.5.3, C.2.5.4 , C.2.5.5, C.2.5.6, C.2.7.1, C.2.7.2, C.2.8.1, C.2.8.2, C.2.8.3, C.2.8.4,	LCC	None Required	LCC

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
		C.2.8.5, C.2.8.6, C.2.8.7, C.2.8.8, C.2.8.9 Goals: C.2			
Air Quality					
Impact 4.6.1	The implementation of the proposed City of Rancho Cordova General Plan land uses would conflict with the land use assumptions used 1994 SMAQMD Regional Ozone Attainment Plan.	Policies: AQ.1.1 Action Items: AQ.1.1.1, AQ.1.1.2, AQ1.1.3	PS	None Available	SU
Impact 4.6.2	Implementation of the proposed General Plan would result in short-term emissions generated by construction and demolition activities that would affect local air quality and could result in health and nuisance-type impacts in the immediate vicinity of individual construction sites as well as contribute to particulate matter and regional ozone impacts.	Policies: AQ.1.1, AQ.1.2, AQ.2.1, AQ.2.2, AQ.2.3, AQ.2.4, AQ.3.1, AQ.3.2, AQ.3.3, AQ.3.4, AQ.4.1 Action Items: AQ.1.1.1, AQ.1.1.2, AQ1.1.3, AQ.1.2.1, AQ.1.2.2, AQ.1.2.3, AQ.2.1.1, AQ.2.3.1, AQ.2.4.1, AQ.3.4.1, AQ.3.4.2, AQ.4.1.1, AQ.4.1.2, AQ.4.1.3, AQ.4.1.4, AQ.4.1.5, AQ.4.1.6	S	None Available	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
Impact 4.6.3	Implementation of the proposed General Plan would increase air pollutant emissions from operational activities of land uses within the Planning Area will exceed thresholds for ROG and NOx, and other federal or state emissions standards.	Stationary Source Reduction Policies and Actions Policies: AQ.4.1, AQ.4.2, AQ.4.4 Action Items: AQ.4.1.1, AQ.4.1.2, AQ.4.1.3, AQ.4.1.4, AQ.4.1.5, AQ.4.1.6, AQ.4.2.1, AQ.4.2.2, AQ.4.2.3, AQ.4.2.4, AQ.4.2.5, AQ.4.4.1 Mobile Source Reduction Policies and Actions Policies: AQ.2.1, AQ.2.2, AQ.2.3, AQ.2.4, AQ.3.1, AQ.3.2, AQ.3.2.4, AQ.3.3, AQ.3.4 Action Items: AQ.2.1.1, AQ.2.2.1, AQ.2.2.2, AQ.2.3.1, AQ.2.4.1, AQ.2.4.2, AQ.3.1.1, AQ.3.1.2, AQ.2.1.1, AQ.3.2.1, AQ.3.2.2, AQ.3.2.3, AQ.3.3.1, AQ.3.3.2, AQ.3.4.1, AQ.3.4.2, AQ.3.4.3	S	MM 4.6.3a MM 4.6.3b	The following mitigation measure shall be added as a policy under General Plan Goal AQ.1: The City shall prohibit wood-burning open masonry fireplaces in all new development. Fireplaces with EPA-approved inserts, EPA-approved stoves, and fireplaces burning natural gas will be allowed. The following mitigation measure shall be added as a policy under General Plan Goal AQ.1: The City shall develop an incentive program to encourage homeowners to replace high-pollution emitting non-EPA-certified wood stoves that were installed before the effective date of the applicable EPA regulation with newer cleaner-burning EPA-certified wood stoves.	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
Impact 4.6.4	Implementation of the proposed General Plan would include sources of toxic air contaminants that may affect surrounding land uses. Sensitive land uses may also be located near existing sources toxic air contaminants.	Policies: AQ.2.1, AQ.4.1, AQ.4.2, AQ.4.4 Action Items: AQ.2.1.1, AQ.4.1.1, AQ.4.1.2, AQ.4.1.3, AQ.4.1.4, AQ.4.1.5, AQ.4.1.6, AQ.4.2.1, AQ.4.2.2, AQ.4.2.3, AQ.4.2.4 , AQ.4.2.5, AQ.4.4.1	PS	MM 4.6.4a	The following change is made to General Plan Policy AQ.4.2.5: ~~Consider~~ aAdoption of an ordinance that limits the amount of time diesel-powered trucks, buses, and other heavy vehicles may idle in accordance with California Air Resources Control Board rules for mobile TAC sources.	SU
				MM 4.6.4b	The following shall be added as a new policy under General Plan Goal AQ.2: Utilize the guidelines in the California Air Resources Control Board Air Quality and Land Use Handbook: A Community Health Perspective when evaluating new development requests that either would generate toxic air contaminant emissions near sensitive receptors or locate new sensitive receptors near existing sources of air toxic emissions or order to minimize health hazards.	

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
Impact 4.6.5	Implementation of the proposed General Plan would include sources that may expose sensitive receptors to construction and long-term odorous emissions.	Policies: *LU.1.4* *Action Items:* *LU.1.4.3*	PS	**MM 4.6.5**	The following mitigation measure shall be added as a new policy under General Plan Goal AQ.1: Require odor impact analyses be conducted for evaluating new development requests that either could generate objectionable odors that may violate SMAQMD Rule 402 or any subsequent rules and regulations regarding objectionable odors near sensitive receptors or locate new sensitive receptors near existing sources of objectionable odors. Should objectionable odor impacts be identified, odor mitigation shall be required in the form of setbacks, facility improvements or other appropriate measures.	LS
Impact 4.6.6	Implementation of the proposed General Plan along with potential development of the Planning Area would exacerbate existing regional problems with ozone and particulate matter.	Stationary Source Reduction Policies and Actions Policies: AQ.4.1, AQ.4.2, AQ.4.4 Action Items: AQ.4.1.1, AQ.4.1.2, AQ.4.1.3, AQ.4.1.4, AQ.4.1.5, AQ.4.1.6, AQ.4.2.1, AQ.4.2.2,	CC	~~None Available~~ Implement mitigation measures MM 4.6.3a and b and MM 4.6.4a and b.		SU

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
	AQ.4.2.3, AQ.4.2.4, AQ.4.2.5, AQ.4.4.1 Mobile Source Reduction Policies and Actions Policies: AQ.2.1, AQ.2.2, AQ.2.3, AQ.2.4, AQ.3.1, AQ.3.2, AQ.3.2.4, AQ.3.3, AQ.3.4, AQ.5.1, AQ.5.2 Action Items: AQ.2.1.1, AQ.2.2.1, AQ.2.2.2, AQ.2.3.1, AQ.2.4.1, AQ.2.4.2, AQ.3.1.1, AQ.3.1.2, AQ.2.1.1, AQ.3.2.1, AQ.3.2.2, AQ.3.2.3, AQ.3.3.1, AQ.3.3.2, AQ.3.4.1, AQ.3.4.2, AQ.3.4.3, AQ.5.1.1, AQ.5.1.2			
Noise				
Impact 4.7.1 Implementation of the proposed General Plan would result in subsequent development projects and cause an increase in construction noise levels that would exceed City of Rancho Cordova noise standards.	Policies: N.1.1, N.1.4, N.1.5 Action Items: N.1.4.1, N.1.4.2, N.1.4.3	PS	**MM 4.7.1** The following shall be added as a new policy under Goal N.1: To the extent feasible and appropriate, the City shall require the use of temporary construction noise control measures for public and private project that may include the use	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
					of temporary noise barriers, temporary relocation of noise-sensitive land uses or other appropriate measures.	
Impact 4.7.2	Implementation of the proposed General Plan would result in increases in traffic noise levels that would be in excess of City of Rancho Cordova noise standards.	Policies: N.1.1, N.1.5, N.1.6, N.2.1, N.2.2, N.2.3, N.2.4 Action Items: N.1.6.1, N.2.1.1, N.2.2.1, N.2.3.1, N.2.4.1	S	None Available		SU
Impact 4.7.3	Implementation of the proposed General Plan could result in future stationary noise sources that generate noise levels in excess of applicable noise standards for non-transportation noise sources.	Policies: N.1.1, N.1.2, N.1.3, N.1.4, N.1.5, N.2.3, N.2.4 Action Items: N.1.2.1, N.1.2.2, N.1.2.3, N.1.3.1, N.1.3.2, N.1.4.1, N.1.4.2, N.1.4.3, N.2.3.1, N.2.4.1	PS	None Available		SU
Impact 4.7.4	Implementation of the proposed General Plan would result in the creation of new noise-sensitive land uses within the 65 dB CNEL noise contours contained within the Mather Airport CLUP. Additionally, the implementation of the General Plan would result in the creation of new noise-sensitive land uses within over-flight areas of Mather Airport, thereby presenting the potential	Policies: LU.3.10, N.1.1, N.1.2 Action Items: N.1.2.11 N.1.2.2 N.1.2.3	S	MM 4.7.4	The following shall be added as a new Policy under Goal N.1: ~~New residential development shall be prohibited within the 60 CNEL Mather Airport Policy Area and~~ ~~n~~New residential development shall only be allowed inside of the 60 CNEL Mather Airport Policy Area if the	SU

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
for annoyance from single event noise.			following conditions are met: 1. Noise insulation is provided in all new residential dwelling units that reduces interior noise levels to 45 dB with windows closed in any habitable room. 2. Prospective buyers are notified through the Public Report prepared by the California Department of Real Estate disclosing the fact that the parcel is located within the Mather Airport Policy Area. 3. An Avigation Easement is recorded on the property acknowledging that the property is located within the Mather Airport Policy Area. The easement shall grant the right of flight and unobstructed passage of all aircraft into and out of Mather Airport. The Avigation Easement shall be granted to the County of Sacramento, recorded with the Sacramento County Recorder and filed with the County Department of Airports.	

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 4.7.5	Implementation of the General Plan could expose future land uses and residents to light rail and public transit related noise.	Policies: N.1.1 N.1.2, N.1.5, N.2.3, N.2.4 Action Items: N.2.3.1, N.2.4.1	LS	None Required	LS
Impact 4.7.6	Implementation of the proposed General Plan in combination with regional growth and traffic conditions (pass-through traffic) would increase transportation noise along area roadways.	Policies: N.1.1, N.1.2, N.1.5, N.2.2, N.2.3, N.2.4 Action Items: N.2.2.1, N.2.3.1, N.2.4.1	CC	None Available	SU
Impact 4.7.7	Implementation of the proposed General Plan, in combination with regional growth in surrounding communities outside of the Planning Area, would increase stationary noise.	Policies: N.1.1, N.1.2, N.1.3, N.1.4, N.2.3, N.2.4 Action Items: N.1.2.1, N.1.2.2, N.1.2.3, N.1.3.1, N.1.3.2, N.1.4.1, N.1.4.2, N.2.3.1, N.2.4.1	CC	None Available	SU
Impact 4.7.8	Implementation of the proposed General Plan in combination with regional growth in the Planning Area and surrounding communities would subject more noise-sensitive land uses to airport noise.	Policies: LU.3.10, N.1.1, N.1.2 Action Items: N.1.2.11, N.1.2.2, N.1.2.3	LCC	None Required	LCC

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
Geology and Soils						
Impact 4.8.1	Implementation of the proposed General Plan, and the resulting increase in population, employment, and development activity within the Planning Area, may expose people, structures, and development to ground shaking and seismic hazards as a result of fault activity.	Policies: S.3.1, S.3.2 Action Items: S.3.1.1, S.3.2.1, S.3.2.2	LS	None Required		LS
Impact 4.8.2	Implementation of the proposed General Plan would include substantial construction and site preparation activities. These activities increase soil erosion, especially from wind and water, and siltation of local drainages during construction, excavation and grading activities.	Policies: NR.5.5 Action Items: NR.5.5.1, NR.5.5.2, NR.5.5.3, NR.5.5.4	LS	None Required		LS
Impact 4.8.3	Implementation of the proposed General Plan may place development in areas with unstable soils.	Policies: S.3.2 Action Items: S.3.2.1, S.3.2.2	LS	None Required		LS
Impact 4.8.4	Implementation of the proposed General Plan could impact areas where soils are may be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.	Policies: ISF.3.4, ISF.4.2 Action Items: ISF.2.6.1, ISF.2.6.2, ISF.2.6.3	LS	None Required		LS
Impact 4.8.5	Implementation of the proposed General Plan would result in the loss of availability of aggregate resources, which are locally important due to their use by the construction community in	Policies: NR.6.1, LU.1.4 Action Items: NR.6.1.1, NR.6.1.2,	S	MM 4.8.5	The following will be added under Goal NR.8 as a new policy: While mining activities are	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
	development of the area.	NR.6.1.3			anticipated to be phased out within the City, the City recognizes the right of these uses to continue, and will require setbacks, buffers, screening and other appropriate measures to allow for the continued operation of mining activities.	
Impact 4.8.6	Implementation of the proposed General Plan, in combination with existing, planned, proposed and reasonably foreseeable development, would not contribute to cumulative geologic and soil impacts, as the impacts would be site-specific and not additive in character.	Policies: NR.5.5, S.3.2 Action Items: NR.5.5.1, NR.5.5.2, NR.5.5.3, NR.5.5.4, S.3.2.1, S.3.2.2	LCC	None Required		LCC
Impact 4.8.7	Implementation of the proposed General Plan, together with past, present, and probable future projects in the area, would result in a cumulatively significant loss of mineral resources in the region.	Policies: NR.6.1, LU.1.4 Action Items: NR.6.1.1, NR.6.1.2, NR.6.1.3	CC	~~None Available~~ Implement Mitigation Measure MM 4.8.5.		SU
Hydrology and Water Quality						
Impact 4.9.1	Implementation of the proposed General Plan could result in the discharge of polluted runoff, discharge that could cause harm to the biological integrity of waterways, adversely impact water quality standards, or otherwise substantially degrade surface water quality.	Policies: NR.3.1, NR.3.2, NR.3.3, NR.3.4, NR.5.3, NR.5.4, NR.5.5 Action Items: NR.3.2.1, NR.3.2.2, NR.3.3.1, NR.3.4.1,	PS	**MM 4.9.1a**	The following shall be added as a new policy under Goal NR.5: Continue to cooperate and participate with the County, other cities and the Regional Water Quality Control Board regarding compliance with the joint National Pollutant	LS

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
		NR.3.4.2, NR.3.4.3, NR.5.3.1, NR.5.3.2, NR.5.3.3, NR.5.4.1, NR.5.4.2, NR.5.4.3, NR.5.5.1, NR.5.5.2, NR.5.5.3, NR.5.5.4			Discharge Elimination System Permit (NPDES No. CAS082597) or any subsequent permit and support water quality improvement projects in order to maintain compliance with regional, state and federal water quality requirements.	
				MM 4.9.1b	The following mitigation measure shall be added as an action item under Policy NR.5.3: Future land uses that are anticipated to utilize hazardous materials or waste shall be required to provide adequate containment facilities to ensure that surface water and groundwater resources are protected from accidental releases. This shall include double-containment, levees to contain spills, and monitoring wells for underground storage tanks, as required by local, state and federal standards.	
Impact 4.9.2	Implementation of the proposed General Plan could result in the degradation of groundwater quality resulting from future land uses.	Policies: NR.5.3, NR.5.4 Action Items: NR.5.4.1, NR.5.4.2, NR.5.4.3	PS	MM 4.9.2	The following shall be added as a new policy under Goal NR.5: The City shall require groundwater impact evaluations be conducted for the Grant Line West, Westborough, Aerojet,	LS

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
			Glenborough, Mather and Jackson Planning Areas to determine whether urbanization of these areas would adversely impact groundwater remediation activities associated with Mather and Aerojet prior to the approval of large-scale development. Should an adverse impact be determined, a mitigation program shall be developed in consultation with applicable local, state and federal agencies to ensure remediation activities are not impacted. This may include the provision of land areas for groundwater remediation facilities, installation/extension of necessary infrastructure or other appropriate measures.	
Impact 4.9.3 Implementation of the proposed General Plan would increase impervious surfaces and alter drainage conditions and storm water runoff rates throughout the Planning Area, which could result in potential flooding impacts. However, the General Plan contains adequate General Plan policies and action items that address drainage and flooding issues.	Policies: S.2.1, S.2.2, S.1.13, S.2.3 Action Items: S.2.1.1, S.2.1.2, S.2.1.3, S.2.2.1, S.2.2.2, S.2.2.3, S.2.2.4, S.2.2.5, S.2.2.6, S.2.2.7, S.2.2.8, S.2.2.9, S.2.3.1, S.2.3.2, S.2.3.3	LS	None Required	LS

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 4.9.4	Implementation of the proposed General Plan would increase demand for water supply and require increased groundwater production and the use of surface water supplies. This additional water supply demand would result in significant effects on the physical environment.	Policies: NR.4.2, NR.5.1, NR.5.2, ISF.2.1, ISF.2.2, ISF.2.3, ISF.2.4, ISF.2.7, LU.2.5 Action Items: NR.4.2.2, NR.4.2.3, NR.5.1.1, NR.5.1.2, NR.5.1.3, NR.5.2.1, NR.5.2.2, ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, ISF.2.4.1, ISF.2.4.2, ISF.2.7.1, LU.2.5.1	S	~~MM 4.9.4 Modify the text of Action Item ISF.2.4.1 and ISF.2.4.2 as follows:~~ ~~*Action ISF.2.4.1 The following shall be required for all development projects, excluding subdivisions:*~~ • ~~*An assured water supply and delivery system shall be available at the time of project approval. The water agency providing service to the project may provide several alternative methods of supply and/or delivery, provided that each is capable individually of providing water to the project. However, assurance of water supply shall identify that the water agency has legal entitlement to the water source and that the water source has long term reliability (at least 20 years) under normal, dry and multiple dry years.*~~ • ~~*All required water infrastructure for the project shall be in place at the time of project approval, or shall be assured through the use of bonds or other sureties to the City's satisfaction. Water infrastructure may be phased to coincide with the phased development of large-scale projects.*~~ ~~*Action ISF.2.4.2 The following shall be required for all subdivisions to the extent permitted by state law:*~~ • ~~*Proposed water supply and delivery systems shall be identified at the time of tentative map approval to the satisfaction of the City. The water agency providing service to the*~~	SU

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
			~~*project may provide several alternative methods of supply and/or delivery, provided that each is capable individually of providing water to the project.*~~ • ~~*The agency providing water service to the subdivision shall demonstrate prior to the approval of the Final Map by the City that sufficient capacity shall be available to accommodate the subdivision plus existing development, and other approved projects in the same service area, and other projects which have received commitments for water service. This assurance of water supply shall identify that the water agency has legal entitlement to the water source and that the water source has long term reliability (at least 20 years) under normal, dry and multiple dry years.*~~ • ~~*Offsite and onsite water infrastructure sufficient to provide adequate water to the subdivision shall be in place prior to the approval of the Final Map or their financing shall be assured to the satisfaction of the City, consistent with the requirements of the Subdivision Map Act.*~~ • ~~*Offsite and onsite water distribution systems required to serve the subdivision shall be in place and contain water at sufficient quantity and pressure prior to the issuance of any building permits. Model homes may be exempted from this policy as determined appropriate by the City, and subject to approval by the City.*~~	

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 4.9.5	Implementation of the proposed General Plan and potential development of the Planning Area would include substantial grading, site preparation, and an increase in urbanized development.	Policies: NR.3.1, NR.3.2, NR.3.3, NR.3.4, NR.5.3, NR.5.4, NR.5.5 Action Items: NR.3.2.1, NR.3.2.2, NR.3.3.1, NR.3.4.1, NR.3.4.2, NR.3.4.3, NR.5.3.1, NR.5.3.2, NR.5.3.3, NR.5.4.1, NR.5.4.2, NR.5.4.3, NR.5.5.1, NR.5.5.2, NR.5.5.3, NR.5.5.4	CC	~~None Available~~ Implement mitigation measures MM 4.9.1a and b and MM 4.9.2.	LCC
Impact 4.9.6	Implementation of the proposed General Plan would increase impervious surfaces and alter drainage conditions and rates in the Planning Area, which could contribute to cumulative flood conditions along the American River, Sacramento River, Cosumnes River, and local waterways. However, the General Plan contains adequate General Plan policies and action items that address drainage and flooding issues.	Policies: S.2.1, S.2.2, S.1.13, S.2.3, NR.5.5 Action Items: S.2.1.1, S.2.1.2, S.2.1.3, S.2.2.1, S.2.2.2, S.2.2.3, S.2.2.4, S.2.2.5, S.2.2.6, S.2.2.7, S.2.2.8, S.2.2.9, S.2.3.1, S.2.3.2, S.2.3.3, NR.5.5.3	LCC	None Required	LCC
Impact 4.9.7	Implementation of the proposed General Plan would contribute to an increased demand for water supply requiring increased groundwater production and the use of surface water supplies that could result in significant environmental impacts.	Policies: NR.4.2, NR.5.1, NR.5.2, ISF.2.1, ISF.2.2, ISF.2.3, ISF.2.4, ISF.2.7, LU.2.5	CC	None Available	SU

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
	Action Items: NR.4.2.2, NR.4.2.3, NR.5.1.1, NR.5.1.2, NR.5.1.3, NR.5.2.1, NR.5.2.2, ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, ISF.2.4.1, ISF.2.4.2, ISF.~~2.7~~7.7.1, LU.2.5.1			
Biological Resources				
Impact 4.10.1 Implementation of the proposed General Plan would result in direct and indirect loss of habitat and individuals of endangered, threatened, rare, proposed, and candidate status as well as plant species identified by the California Native Plant Society with a rating of List 1B (i.e. rare, threatened or endangered plants).	Policies: NR.1, NR.1.2, NR.1.3, NR.1.4, NR.1.5, NR.2.1, NR.2.2, NR.2.3, NR.2.4, NR.3.1, NR.3.2, NR.3.3, NR.3.4, NR.4.1, NR.5.3, NR.5.4, NR.5.5, NR.6.1 Action Items: NR.1.1.1, NR.1.2.1, NR.1.3.1, NR.1.4.1, NR.2.2.1, NR.2.4.1, NR.2.4.2, NR.3.2.1, NR 3.3.1, NR.3.4.1, NR.3.4.2, NR.3.4.3, NR.4.1.1, NR.4.1.3, NR.5.3.1, NR.5.3.2, NR.5.3.3, NR.5.4.1, NR.5.4.2, NR.5.4.3,	S	**MM 4.10.1a** The following shall be incorporated into the Natural Resources Element as a policy under Goal NR.1: The City shall require a biological resources evaluation for private and public development projects in areas identified to contain or possibly contain listed plant and/or wildlife species based upon the City's biological resource mapping provided in the General Plan EIR or other technical materials. This evaluation shall be conducted prior to the authorization of any ground disturbance. **MM 4.10.1b** The following measure shall be incorporated as an action	SU

Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
	NR.5.5.1, NR.5.5.2, NR.5.5.3, NR.5.5.4			item immediately under the above policy (MM 4.10.1a): For those areas in which special status species are found or likely to occur or where the presence of species can be reasonably inferred, the City shall require mitigation of impacts to those species that ensure that the project does not contribute to the decline of the affected species populations in the region to the extent that their decline would impact the viability of the regional population. Mitigation shall be designed by the City in coordination with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG), and shall emphasize a multi-species approach to the maximum extent feasible. This may include development or participation in a habitat conservation plan.	
			MM 4.10.1c	The following measure shall be incorporated into the Natural Resources Element as a policy under Goal NR.1:	

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				The City shall encourage creation of habitat preserves that are immediately adjacent to each other in order to provide interconnected open space areas for animal movement.	
			MM 4.10.1d	The following measure shall be incorporated into the Natural Resources Element as an action item under Policy NR.1.4: The City shall adopt and maintain a Noxious Weed Ordinance. The Noxious Weed Ordinance shall include regulatory standards for construction activities that occur adjacent to natural areas to inhibit the establishment of noxious weeds through accidental seed import.	
			MM 4.10.1e	The following measure shall be incorporated into the Natural Resources Element as a policy under Goal NR.2: The City shall require that drainage improvements that discharge into areas of wetlands to be preserved are, to the maximum extent	

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
			feasible, designed to mimic the undeveloped surface water flow conditions of the area in terms of seasonality, volume and flow velocity. MM 4.10.1f The following measure shall be incorporated as an action item under Policy NR.1.1: As part of the consideration of development applications for individual Planning Areas containing habitats that support special-status plant and animal species that are planned to be preserved, the City shall require that these preserved habitats have interconnections with other habitat areas in order to maintain the viability of the preserved habitat to support the special-status species identified. The determination of the design and size of the "interconnections" shall be made by the City, as recommended by a qualified professional, and will include consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service.	

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
			MM 4.10.1g The following modifications shall be made to Action NR.1.2.1: Establish a Swainson's Hawk Ordinance in coordination with the California Department of Fish and Game to establish ~~help guide~~ the process of mitigating for the loss of Swainson's hawk foraging habitat based on habitat value lost to development. The ordinance will set forth a process where habitat lost to development will be mitigated through the permanent protection of equivalent or better existing habitat conditions (referred to hereafter as "mitigation lands"). The specific required mitigation ratios (habitat acreage lost versus mitigation lands) and any other provisions to mitigation process shall be established through technical studies as part of the development of the ordinance and will take into account value of habitat to be converted in relation to habitat value of the mitigation lands (e.g., relation to nesting sites), proximity of the mitigation lands to adjacent	

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
			conditions affecting habitat (e.g., nearby land uses and already permanently protected lands), and other relevant factors. The ordinance will also establish standards ensuring that mitigation land will be adequately protected and managed in perpetuity (e.g., via conservation easement, deed restriction or other appropriate method), and setting forth the timing of the required provision of mitigation lands in relation with the timing of the loss of habitat in the City (as its boundaries may be changed through subsequent annexations), such that mitigation lands shall be provided no later than prior to ground disturbance.	
Impact 4.10.2 Implementation of the proposed General Plan would result in direct and indirect loss of habitat and individuals of animal and plant species of concern and other non-listed special status species.	Policies: NR.1.1, NR.1.2, NR.1.3, NR.1.4, NR.1.5, NR.2.1, NR.2.2, NR.2.3, NR.2.4, NR.3.1, NR.3.2, NR.3.3, NR.3.4, NR.4.1, NR.5.1, NR.5.3, NR.5.4, NR.5.5, NR.6.1	S	~~None Available~~ Implement mitigation measures MM 4.10.1a through g.	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
		Action Items: NR.1.1.1, NR.1.2.1, NR.1.3.1, NR.1.4.1, NR.2.2.1, NR.2.4.1, NR.2.4.2, NR.3.2.1, NR 3.3.1, NR.3.4.1, NR.3.4.2, NR.3.4.3, NR.4.1.1, NR.4.1.3, NR.5.3.1, NR.5.3.2, NR.5.3.3, NR.5.4.1, NR.5.4.2, NR.5.4.3, NR.5.5.1, NR.5.5.2, NR.5.5.3, NR.5.5.4				
Impact 4.10.3	Implementation of the proposed General Plan would result in the loss of foraging habitat for raptors, migratory birds, and other wildlife.	Policies: NR.1.1, NR.1.2, NR.1.3, NR.1.4, NR.1.5, NR.2.1, NR.2.2, NR.2.3, NR.2.4, NR.3.1, NR.3.2, NR.3.3, NR.3.4, NR.4.1, NR.4.2, NR.5.3 Action Items: NR.1.1.1, NR.1.2.1, NR.1.3.1, NR.1.4.1, NR.2.2.1, NR.2.4.1, NR.2.4.2, NR.3.2.1, NR.3.2.2, NR, ~~.3.1~~3.3.1, NR.3.4.1, NR.3.4.2, NR.3.4.3, NR.4.1.1, NR.4.1.2, NR.4.1.3, NR.4.2.2, NR.4.2.3, NR.4.3.1, NR.4.3.2, NR.4.3.3,	S	MM 4.10.3	The following measure shall be incorporated into the Natural Resources Element as a policy under Goal NR.1: The City shall require that impacts to riparian habitats be mitigated at a no net loss of existing function and value based on field survey and analysis of the riparian habitat to be impacted. No net loss may be accomplished by avoidance of the habitat, restoration of existing habitat, or creation of new habitat, or through some combination of the above.	SU

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		NR.4.3.4, NR.5.3.1, NR.5.3.2			
Impact 4.10.4	Implementation of the proposed General Plan would result in substantial adverse impacts to and the potential loss of jurisdictional waters of the U.S.	Policies: NR.1.1, NR.1.3, NR.1.4, NR.1.5, NR.2.1, NR.2.2, NR.2.3, NR.2.4, NR.3.1, NR.3.2, NR.3.3, NR.3.4, NR.5.1, NR.5.3, NR.5.4, NR.5.5 Action Items: NR.1.1.1, NR.1.3.1, NR.1.4.1, NR.2.2.1, NR.2.4.1, NR.2.4.2, NR.3.2.1, NR 3.3.1, NR.3.4.1, NR.3.4.2, NR.3.4.3, NR.5.3, NR.5.3.2, NR.5.3.3, NR.5.4.1, NR.5.4.2, NR.5.4.3, NR.5.5.1, NR.5.5.2, NR.5.5.3, NR.5.5.4	S	None Available	SU
Impact 4.10.5	Implementation of the proposed General Plan would interfere substantially with the movement of several special status and common wildlife species.	Policies: NR.1.1, NR.1.2, NR.1.3, NR.1.4, NR.1.5, NR.2.1, NR.2.2, NR.2.3, NR.2.4, NR.3.1, NR.3.2, NR.3.3, NR.3.4, NR.4.1, NR.5.1, NR.5.3, NR.5.4, NR.5.5,	S	The following measure identifies changes to policy NR.3.2. Deletions are shown as a ~~strikethrough~~ and new text is <u>underlined</u>. **MM 4.10.5a** Modify Policy NR.3.2 to read: Create or retain the natural topographic relief and meandering alignment of natural creek corridors in the construction of new channels	SU

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	NR.6.1 Action Items: NR.1.1.1, NR.1.2.1, NR.1.3.1, NR.1.4.1, NR.2.2.1, NR.2.4.1, NR.2.4.2, NR.3.2.1, NR 3.3.1, NR.3.4.1, NR.3.4.2, NR.3.4.3, NR.4.1.1, NR.4.1.3, NR.5.3.1, NR.5.3.2, NR.5.3.3, NR.5.4.1, NR.5.4.2, NR.5.4.3, NR.5.5.1, NR.5.5.2, NR.5.5.3, NR.5.5.4		and the modification of existing channels, and ~~discourage~~ prohibit the placement of concrete within creeks and channels. The following mitigation measures shall be incorporated into the City of Rancho Cordova General Plan as new policies under Goal NR.1. MM 4.10.5b The following mitigation measures shall be incorporated into the City of Rancho Cordova General Plan as a new policy under Goal NR.1: The City shall avoid the placement of new roadways within habitat preserves to the maximum extent feasible. MM 4.10.5c The following mitigation measures shall be incorporated into the City of Rancho Cordova General Plan as a new policy under Goal NR.1: In such cases where habitat preserves are crossed by a roadway, or where two adjacent preserves are separated by a roadway, the roadway shall be designed or updated with wildlife passable fencing separating	

Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
				the roadway from the preserve and/or shall incorporate design features that allow for the movement of wildlife across or beneath the road without causing a hazard for vehicles and pedestrians on the roadway.	
Impact 4.10.6	Implementation of the proposed General Plan would result in the loss of native and landmark trees.	Policies: NR.1.1, NR.1.3, NR.1.4, NR.2.2, NR.3.1, NR.3.2, NR.3.4, NR.4.1 Action Items: NR.1.1.1, NR.1.3.1, NR.1.4.1, NR.2.2.1, NR.3.4.3, NR.4.1.1, NR.4.1.3	S	None Available	SU
Impact 4.10.7	Implementation of the proposed General Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any adopted biological resources recovery or conservation plan of any Federal or State agency.	No Applicable Policies or Actions	No Impact		No Impact
Impact 4.10.8	Implementation of the proposed General Plan, together with past, present, and probable future projects in the Planning Area and larger regional context would result in a cumulatively significant loss of biological resources in the region.	Policies: NR.1.1, NR.1.2, NR.1.3, NR.1.4, NR.1.5, NR.2.1, NR.2.2, NR.2.3, NR.2.4, NR.3.1, NR.3.2, NR.3.3,	CC	None Available Implement mitigation measures MM 4.10.1a through g, MM 4.10.3, MM 4.10.5a through c.	SU

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	NR.3.4, NR.4.1, NR.4.2, NR.5.3 Action Items: NR.1.1.1, NR.1.2.1, NR.1.3.1, NR.1.4.1, NR.2.2.1, NR.2.4.1, NR.2.4.2, NR.3.2.1, NR.3.2.2, NR 3.3.1, NR.3.4.1, NR.3.4.2, NR.3.4.3, NR.4.1.1, NR.4.1.2, NR.4.1.3, NR.4.2.2, NR.4.2.3, NR.4.3.1, NR.4.3.2, NR.4.3.3, NR.4.3.4, NR.5.3.1, NR.5.3.2			
Cultural and Paleontological Resources				
Impact 4.11.1 Adoption of the City of Rancho Cordova General Plan could result in the potential disturbance of cultural resources (i.e., prehistoric sites, historic sites, and isolated prehistoric/historic artifacts and features) and human remains.	Policies: CHR.1.1, CHR.1.2, CHR.1.3, CHR.3.1, CHR.3.2, CHR.3.3, CHR.3.4, CHR.4.1 Action Items: CHR.1.1.1, CHR.1.1.2, CHR.1.1.3, CHR.1.1.4, CHR.1.1.5, CHR.1.1.6, CHR.1.2.1, CHR.1.2.2, CHR.3.1.1, CHR.3.1.2, CHR.3.1.3,	PS	None Available	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
		CHR.3.2.1, CHR.3.2.2, CHR.3.2.3, CHR.3.2.4, CHR.3.3.1, CHR.3.3.2, CHR.3.3.3, CHR.3.3.4, CHR.3.4.1, CHR.3.4.2, CHR.4.1.1, CHR.4.1.2				
Impact 4.11.2	Adoption of the Rancho Cordova General Plan could result in the potential disturbance of paleontological resources (i.e., fossils and fossil formations).	Action Items: CHR.3.3.4	PS	**MM 4.11.2**	The following text change shall be made to Action CHR.~~3.3.3~~ 1.3.1: Require historic resources and paleontological studies (i.e., archaeological and historical investigations) for all applicable discretionary projects, in accordance with CEQA regulations. The studies should identify paleontological, historic or cultural resources in the project area, determine their eligibility for inclusion in the California Register of Historical Resources, and provide mitigation measures for any resources in the project area that cannot be avoided.	LS
Impact 4.11.3	Adoption of the Rancho Cordova General Plan along with foreseeable development in the region could result	Policies: CHR.1.1, CHR.1.2,	CC	None Available		SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
	in the disturbance of cultural resources (i.e., prehistoric sites, historic sites, and isolated artifacts and features) and human remains.	CHR.1.3, CHR.3.1, CHR.3.2, CHR.3.3, CHR.3.4, CHR.4.1 Action Items: CHR.1.1.1, CHR.1.1.2, CHR.1.1.3, CHR.1.1.4, CHR.1.1.5, CHR.1.1.6, CHR.1.2.1, CHR.1.2.2, CHR.3.1.1, CHR.3.1.2, CHR.3.1.3, CHR.3.2.1, CHR.3.2.2, CHR.3.2.3, CHR.3.2.4, CHR.3.3.1, CHR.3.3.2, CHR.3.3.3, CHR.3.3.4, CHR.3.4.1, CHR.3.4.2, CHR.4.1.1, CHR.4.1.2			
Impact 4.11.4	Adoption of the Rancho Cordova General Plan along with any foreseeable development in the region could result in the potential disturbance of paleontological resources (i.e., fossils and fossil formations).	Action Items: CHR.3.3.4	LCC	~~None Required~~ Implement Mitigation Measure MM 4.11.2.	LCC

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Public Services and Utilities					
Impact 4.12.1.1	Implementation of the General Plan would result in the need for additional fire protection and emergency medical equipment and facilities that could result in physical environmental impacts.	Policies: ISF.2.1, ISF.2.2, ISF.2.3, ISF.2.4, ISF.2.5, S.9.1, S.9.2, S.9.3 Action Items: ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.1.4, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, S.9.1.1, S.9.1.2, S.9.1.3, S.9.1.4, S.9.1.5, S.9.1.6, S.9.1.7, S.9.1.8	LS	None Required	LS
Impact 4.112.1.2	Implementation of the proposed General Plan could result in safety hazards associated with wildland fires in residential areas adjacent to open space and natural areas.	Policies: S.9.1, S.9.2, S.9.3 Action Items: S.9.1.1, S.9.1.2, S.9.1.3, S.9.1.4, S.9.1.5, S.9.1.6, S.9.1.7, S.9.1.8	LS	None Required	LS
Impact 4.12.1.2	Implementation of the General Plan in combination with other reasonably foreseeable development (based on Sacramento County, and the cities of Folsom, Elk Groove, Citrus Heights, Galt, Lodi, and Sacramento General Plans land use projections), would increase the population within the SMFD service area, requiring additional fire and emergency medical services and	Policies: ISF 2.1, ISF.2.2, ISF.2.3, ISF.2.4, ISF.2.5, S.9.1, S.9.2, S.9.3 Action Items: ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.1.4, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3,	LCC	None Required	LS

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
	related facilities.	S.9.1.1, S.9.1.2, S.9.1.3, S.9.1.4, S.9.1.5, S.9.1.6, S.9.1.7, S.9.1.8			
Impact 4.12.2.1	Implementation of the General Plan would increase the Planning Area population and would result in additional commercial, industrial and recreational uses in the Planning Area uses, which may result in additional law enforcement protection facilities that could result in physical environmental impacts.	Policies: ISF 2.1, ISF.2.3, ISF.2.4, ISF.2.5, S.7.1, S.8.1, S.8.2, S.8.3, S.8.4 Action Items: ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.1.4, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, S.7.1.1, S.7.1.2, S.8.1.1	LS	None Required	LS
Impact 4.12.2.2	The neighborhood design, home design, street design, and other features associated with implementation of the General Plan could reduce the ability of the City of Rancho Cordova Police Department to enforce the law and respond to crime and other emergencies in the project area.	Policies: S.7.1, S.8.1, S.8.2, S.8.3, S.8.4, ISF.2.2 Action Items: S.7.1.1, S.7.1.2, S.8.1.1, ISF.2.2.1	LS	None Required	LS
Impact 4.12.2.3	Implementation of the General Plan and other reasonably foreseeable development in southeastern Sacramento County (based on Sacramento County land use projections) would increase the population within the Planning Area and surrounding area and would require additional law enforcement services and related facilities under cumulative conditions.	Policies: S.7.1, S.8.1, S.8.2, S.8.3, S.8.4, ISF.2.2 Action Items: S.7.1.1, S.7.1.2, S.8.1.1, ISF.2.2.1	LCC	None Required	LCC

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 4.12.3.1	Implementation the General Plan would require additional treatment capacity, storage capacity, and other conveyance facilities to meet the projected water demands.	Policies: ISF.2.1, ISF.2.2, ISF.2.3, ISF.2.4, ISF.2.5, ISF.2.6, ISF.2.7, ISF.2.8, ISF.3.1 Action Items: ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.1.4, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, ISF.2.4.1, ISF.2.4.2, ISF.2.7.1, ISF.2.8.1, ISF.2.8.2, ISF.3.1.1, ISF.3.1.2, ISF.3.1.3, ISF.3.1.4	S	None Available	SU
Impact 4.12.3.2	Implementation of the General Plan would contribute to the need for additional treatment capacity, storage capacity, and other conveyance facilities to meet cumulative water demands with SCWA, GSWC and Cal-Am.	Policies: ISF.2.1, ISF.2.2, ISF.2.3, ISF.2.6, ISF.2.7, NR.5.1, NR.5.2, NR.5.3, NR.5.4, NR.5.5 Action Items: ISF.2.1.1, ISF.2.1.2 , ISF.2.1.3, ISF.2.1.4, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, ISF.2.6.1, ISF.2.6.2, ISF.2.6.3, ISF.2.7.1, NR.5.1.1, NR.5.1.2, NR.5.1.3, NR.5.2.1, NR.5.2.2, NR.5.3.1, NR.5.3.2, NR.5.3.3,	CC	None Available	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
		NR.5.4.1, NR.5.4.2, NR.5.4.3, NR.5.5.1, NR.5.5.2, NR.5.5.3, NR.5.5.4				
Impact 4.12.4.1	Implementation of the Rancho Cordova General Plan would substantially increase wastewater flows and require additional infrastructure and may require additional treatment capacity to accommodate anticipated demands that would result in a physical effect on the environment.	Policies: ISF.2.1, ISF.2.2, ISF.2.3, ISF.2.6, ISF.2.7, LU.2.5 Action Items: ISF.2.1.1, ISF.2.1.2 , ISF.2.1.3, ISF.2.1.4, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2 , ISF.2.3.3, ISF.2.6.1, ISF.2.6.2, ISF.2.6.3, ISF.2.7.1, LU.2.5.1	S	None Available		SU
Impact 4.12.4.2	Implementation of the proposed General Plan, in addition to other reasonably foreseeable development in eastern Sacramento County (based on the land use projections established in the Sacramento County General Plan), would substantially increase in wastewater flows and require additional infrastructure and treatment capacity that would result in a physical effect on the environment.	Policies: ISF.2.1, *ISF.2.2, ISF.2.3, ISF.2.6, ISF.2.7, LU.2.5* Action Items: *ISF.2.1.1, ISF.2.1.2 , ISF.2.1.3, ISF.2.1.4, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2 , ISF.2.3.3, ISF.2.6.1, ISF.2.6.2, ISF.2.6.3, ISF.2.7.1, LU.2.5.1*	CC	None Available		SU
Impact 4.12.5.1	Implementation of the General Plan would increase solid waste generation and the demand for related services.	Policies: ISF.2.1, ISF.2.2, NR.8.1, NR.8.2, NR.8.3, NR.8.4,	S	**MM 4.12.5.1**	The following shall be added as a new policy under Goal LU.1: Property buffering for the Kiefer	LS

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
		NR.8.5, NR.8.6, NR.8.7 Action Items: ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.1.4, NR.8.1.1, NR.8.1.2, NR.8.1.3, NR.8.1.4, NR.8.1.5, NR.8.1.6, NR.8.2.1, NR.8.4.1, NR.8.5.1		landfill of a 2,000-foot buffer around the permitted footprint of the landfill shall be required. ~~planned with the landfill's operation in mind.~~ Where appropriate, land use density, buffers, or other measures should be used when planning future land uses near the landfill.	
Impact 4.12.5.2	The proposed project, in addition to proposed and approved projects in the region area, would generate solid waste that would require expanded collection and disposal services.	Policies: ISF.2.1, ISF.2.2, NR.8.1, NR.8.2, NR.8.3, NR.8.4, NR.8.5, NR.8.6, NR.8.7 Action Items: ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.1.4, NR.8.1.1, NR.8.1.2, NR.8.1.3, NR.8.1.4, NR.8.1.5, NR.8.1.6, NR.8.2.1, NR.8.4.1, NR.8.5.1	LCC	None Required	LCC
Impact 4.12.6.1	Implementation of the project would increase student enrollment in the Planning Area and require the construction of new schools and related facilities to serve the anticipated demand.	Policies: ISF.4.1, *ISF.2.1, ISF.2.2, ISF.2.3* Action Items: ISF.4.1.1, *ISF.4.1.2, ISF.2.1.1, , ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3*	LS	None Required	LS

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 4.12.6.2	Implementation of the General Plan in combination with other reasonably foreseeable development (based on General Plan land use projections for Sacramento County, Folsom, and Elk Grove) proposed in eastern Sacramento County would result in a cumulative increase in student enrollment and require additional schools and related facilities to accommodate the growth.	Policies: ISF.4.1, ISF.2.1, ISF.2.2, ISF.2.3 Action Items: ISF.4.1.1, ISF.4.1.2, ISF.2.1.1, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3	LCC	None Required	LCC
Impact 4.12.7.1	Implementation of the General Plan would increase the demand for existing facilities and require additional parks and recreational facilities to accommodate the anticipated growth associated with the General Plan.	Policies: ISF.2.1, ISF.2.2, ISF.2.3, UD.3.3, OSPT.1.1, OSPT.1.2, OSPT.1.3, OSPT.1.4, OSPT.1.5, OSPT.1.6, OSPT.2.1, OSPT.2.2, OSPT.2.3, OSPT.2.4, OSPT.3.1, OSPT.3.2, OSPT.3.3, OSPT.4.1, OSPT.4.2 Action Items: ISF.2.1.1, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, UD.3.3.1, UD.3.3.2, UD.3.3.3, UD.3.3.4,	LS	None Required	LS

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
	OSPT.1.1.1, OSPT.1.1.2, OSPT.1.1.3, OSPT.1.4.1, OSPT.1.4.2, OSPT.1.5.1, OSPT.1.5.2, OSPT.1.5.3, OSPT.1.6.1, OSPT.1.6.2, OSPT.2.1.1, OSPT.2.1.2, OSPT.2.1.3, OSPT.2.1.4, OSPT.2.1.5, OSPT.2.1.6, OSPT.2.1.7, OPST.2.2.1, OPST.2.3.1, OSPT.2.3.1, OSPT.2.3.2, OSPT.3.1.1, OSPT.3.1.2, OSPT.3.1.3, OSPT.3.1.4, OSPT.3.2., OSPT.3.3.1, OSPT.4.1.1, OSPT.4.1.2, OSPT.4.2.1, OSPT.4.2.2, OSPT.4.2.3 Goals: OSPT.3, OSPT.4			

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 4.12.7.3	Implementation of the General Plan in combination with other reasonably foreseeable development would require additional park and recreation facilities within the Planning Area boundaries and CRPD's service area boundaries.	Policies: ISF.2.1, ISF.2.2, ISF.2.3, UD.3.3, OSPT.1.1, OSPT.1.2, OSPT.1.3, OSPT.1.4, OSPT.1.5, OSPT.1.6, OSPT.2.1, OSPT.2.2, OSPT.2.3, OSPT.2.4, OSPT.3.1, OSPT.3.2, OSPT.3.3, OSPT.4.1, OSPT.4.2 Action Items: ISF.2.1.1, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, UD.3.3.1, UD.3.3.2, UD.3.3.3, UD.3.3.4, OSPT.1.1.1, OSPT.1.1.2, OSPT.1.1.3, OSPT.1.4.1, OSPT.1.4.2, OSPT.1.5.1, OSPT.1.5.2, OSPT.1.5.3, OSPT.1.6.1, OSPT.1.6.2, OSPT.2.1.1,	LCC	None Required	LCC

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
	OSPT.2.1.2, OSPT.2.1.3, OSPT.2.1.4, OSPT.2.1.5, OSPT.2.1.6, OSPT.2.1.7, OPST.2.2.1, OPST.2.3.1, OSPT.2.3.1, OSPT.2.3.2, OSPT.3.1.1, OSPT.3.1.2, OSPT.3.1.3, OSPT.3.1.4, OSPT.3.2.1, OSPT.3.3.1, OSPT.4.1.1, OSPT.4.1.2, OSPT.4.2.1, OSPT.4.2.2, OSPT.4.2.3, Goals: OSPT.3, OSPT.4			
Impact 4.12.8.1 Implementation of the General Plan would substantially increase demand for electrical, natural gas, telephone and related infrastructure.	Policies: ISF.2.1, ISF.2.2, ISF.2.3, ISF.2.7, ISF.2.8 Action Items: ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.1.4, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, ISF.2.7.1, ISF.2.8.1, ISF.2.8.2	LS	None Required	LS

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
Impact 4.12.8.2	Implementation of the proposed project as well as potential development in the surrounding areas (based on Sacramento County General Plan land use projections) would result in cumulative utility service impacts.	Policies: ISF.2.1, ISF.2.2, ISF.2.3, ISF.2.7, ISF.2.8 Action Items: ISF.2.1.1, ISF.2.1.2, ISF.2.1.3, ISF.2.1.4, ISF.2.2.1, ISF.2.3.1, ISF.2.3.2, ISF.2.3.3, ISF.2.7.1, ISF.2.8.1, ISF.2.8.2	LCC	None Required		LCC
Visual Resources/Light and Glare						
Impact 4.13.1	Implementation of the proposed General Plan Land Use Map will not result in substantial damage to scenic resources within a state scenic highway.	No Applicable Policies or Actions	No Impact	None Required		No Impact
Impact 4.13.2	Implementation of the General Plan will encourage new development and redevelopment activities that could potentially degrade existing scenic vistas.	No Applicable Policies or Actions	LS	None Required		LS
Impact 4.13.3	Implementation of the General Plan will encourage new development and redevelopment activities that could degrade the existing visual character or quality of the Planning Area.	Policies: LU.1.4, NR.3.1, NR.3.2, NR.3.3, NR.3.4, NR.4.1, NR.4.2, NR.4.3, UD.1.2, UD.2.3, UD.4.2 Action Items: LU.1.4.1, LU.1.4.2, LU.1.4.3, LU.1.4.4,	PS	**MM 4.13.3**	The following shall be added as a new policy under Goal LU.1: Create development standards in the Zoning Code and design guidelines in the Citywide Design Guidelines to specifically address the compatibility of high-rise development in the Downtown Planning Area with	SU

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Impact		General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
		NR.3.2.1, NR.3.2.2, NR 3.3.1, NR.3.4.1, NR.3.4.2, NR.3.4.3, NR.4.1.1, NR.4.1.2, NR.4.1.3, NR.4.2.1, NR.4.2.2, NR.4.2.3, NR.4.3.1, NR.4.3.2, NR.4.3.3, NR.4.3.4, UD.2.3.1, UD.4.2.1		consideration of those issues unique to high-rise development (visual intrusion, distant viewshed, shadowing of adjacent properties, glare, wind tunnel effects, emergency service, interruption of electronic transmissions, traffic and parking, noise and vibration).	
Impact 4.13.4	Implementation of the General Plan Land Use Map would create new sources of daytime glare, and substantially change nighttime lighting and illumination levels in the Planning Area, associated with new and redevelopment activities.	Policies: UD.4.2 Action Items: 4.2.1	LS	None Required	LS
Impact 4.13.5	Implementation of the General Plan will encourage new development and redevelopment activities that would contribute to the cumulative alteration of existing landscape characteristics of the region.	Policies: LU.1.4, NR.2.1, NR.2.2, NR.3.1, NR.3.2, NR.3.3, NR.3.4, NR.4.1, NR.4.2, NR.4.3, UD.1.2, UD.2.3, UD.4.2 Action Items: LU.1.4.1, LU.1.4.2, LU.1.4.3, LU.1.4.4, NR.2.2.1, NR.3.2.1, NR.3.2.2, NR 3.3.1, NR.3.4.1, NR.3.4.2, NR.3.4.3, NR.4.1.1, NR.4.1.2, NR.4.1.3, NR.4.2.1, NR.4.2.2,	CC	~~None Available~~ Implement Mitigation Measure MM 4.13.3.	SU

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Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
	NR.4.2.3, NR.4.3.1, NR.4.3.2, NR.4.3.3, NR.4.3.4, UD.2.3.1, UD.4.2.1			

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3.0 – Comments and Responses to Comments on the Draft EIR

3.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) (Cal. Pub. Res. Code Section 21000, et seq.) and State CEQA Guidelines (Cal. Code Regs. Section 15000, et seq.). Rancho Cordova is the lead agency for the environmental review of the proposed Rancho Cordova General Plan and has the principal responsibility for approving the project. This FEIR assesses the expected environmental impacts resulting from the adoption and implementation of the proposed General Plan and responds to comments received on the Draft EIR.

3.2 LIST OF COMMENTERS

The following individuals and representatives of organizations and agencies submitted written comments on the Draft EIR.

Letter	Individual or Signatory	Affiliation	Date
A	Kevin Boles	State of California Public Utilities Commission	3/20/06
B	Jeff Rodrigues	Rancho Cordova Police Department	3/29/06
C	Kent Smith	State of California Department of Fish and Game	4/28/06
D	Scott Morgan	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	3/28/06
E	Marcia Grambusch	Elk Grove Unified School District	5/4/06
F	Robert Sherry	Sacramento County Planning and Community Development	5/10/06
G	David Pelser	Sacramento County Department of Waste Management and Recycling	5/11/06
H	Kenneth Payne	City of Folsom Utilities Department	5/12/06
I	Daniel Jones	Sacramento County Water Agency	5/15/06
J	Charlene McGhee	Sacramento Metropolitan Air Quality Management District	5/15/06
K	Kenneth Sanchez	U.S. Fish and Wildlife Service	5/15/06
L	Paul Philleo	County Sanitation District 1	5/10/06
M	John Coppola	Sacramento County Water Agency	5/9/06
N	Erik de Kok	City of Sacramento Development Services Department	5/10/06
O	Terry Roberts	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	5/16/06
P	Bruce de Terra	California Department of Transportation	5/17/06
Q	Malissa Ellis	Sacramento Municipal Utility District	5/12/06
1	Victoria Harris	Resident	No Date
2	Alta Tura	Urban Creeks Council	3/21/06
3	Victoria Harris	Resident	3/27/06
4	Victoria Harris	Resident	4/13/06

Letter	Individual or Signatory	Affiliation	Date
5	Larry Ladd	Resident	4/27/06
6	Thomas Larmore	Harding Larmore Mullen Jakle Kutcher & Kozal, LLP	5/12/06
7	Anne Geraghty	WALKSacramento	5/15/06
8	Keith Wagner	Habitat 2020 and Environmental Council of Sacramento	5/15/06
9	Sara Provancha	Property Owner	5/8/06
10	Elke Guenter	Resident	5/15/06
11	Victoria Harris	Resident	5/11/06
12	Anne Geraghty	WALKSacramento	5/9/06
13	Various	April 13, 2006 Planning Commission Meeting	4/13/06

3.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

State CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by Commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines 15204).

Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. State CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

State CEQA Guidelines Section 15088 also recommends that where a response to comments results in revisions to the Draft EIR, that those revisions be incorporated as a revision to the Draft EIR, or as a separate section of the Final EIR.

RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Public agency comment letters are coded by letters and each issue raised in the comment letter is assigned a number (e.g., Comment Letter A, comment 1 is referred to as: A-1).

- Individual and interest group comment letters are coded by numbers and each issue raised in the comment letter is assigned a number (e.g., Comment Letter 1, comment 1: 1-1).

Where changes to the Draft EIR text result from responding to comments, those changes are included in the response and demarcated with revision marks (underline for new text, ~~strike-out~~ for deleted text). Comment-initiated text revisions to the Draft EIR and minor staff initiated changes are also provided and are demarcated with revision marks in Section 4.0 (Errata) of this Final EIR.

Letter A

STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

March 20, 2006

Patrick Angell
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova, CA 95670

Dear Mr. Angell:

Re: SCH 2005022137; Rancho Cordova General Plan

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the rail corridor in the County be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way. A-1

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the County.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

Kevin Boles
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection and Safety Division

cc: Jim Smith, UP

MAR 27 2006

Letter A Kevin Boles, State of California Public Utilities Commission

Response A-1: Comments associated with proper consideration of safety in relation to rail in the Rancho Cordova Planning Area are noted. Rail operations in the Rancho Cordova Planning Area are currently limited to the existing light rail line and freight rail line that parallels Folsom Boulevard in a developed portion of the City. As identified the proposed General Plan Transit System Map (Draft EIR Figure 3.0-21), the City is considering grade separations with the existing rail lines. In addition, the General Plan Circulation Element includes policies C.2.7 and C.2.8 and their associated actions, which call for grade-separated crossings or enhanced at-grade crossings at key locations, as well as the general promotion of bicycling and walking as a safe activity. Draft EIR Impact 4.5.3 specifically notes that the use of modern construction design standards for transportation improvements would ensure that future development under the General Plan would not result in unacceptable safety conflicts.

Letter B

RANCHO CORDOVA POLICE DEPARTMENT

Thomas McMahon
Chief of Police

10361 Rockingham Drive
Sacramento, California 95827

916.875.9600 – Main
916.875.8673 – Fax

www.RanchoCordovaPD.com

March 24, 2006

Pam Johns, General Plan Manager
Rancho Cordova General Plan
2927 Prospect Park Drive
Rancho Cordova, CA 95670

MAR 29 2006
PACIFIC MUNICIPAL CONSULTANTS

RE: CITY OF RANCHO CORDOVA GENERAL PLAN NOP

Dear Hilary:

You have requested that the Rancho Cordova Police Department provide comments regarding the City of Rancho Cordova General Plan. The following comments are provided for inclusion in the General Plan:

1) NEIGHBORHOOD DESIGN

The Rancho Cordova Police Department provides planning comments based on the concepts of Crime Prevention Through Environmental Design (CPTED). The basic concepts of CPTED are: natural surveillance, territorial reinforcement, and access control. Physical separation between buildings and exposures must be designed to increase visibility within developments. Improvements to the physical structure can prevent crime. Recognizing there may be inherent conflicts between law enforcement, design and other planning objectives the intent of these measures is to seek cooperative solutions.

a) The following items are administrative in nature, and will provide a roadmap to designing safer communities. Working with the City Planning Department, the Police Department will:

b) Prepare a "security ordinance" which will provide minimum safety and security specifications for new residential and commercial developments.

c) Adapt transit-oriented development guidelines to the needs of crime prevention to the extent possible.

B-1

2) SUBDIVISION/BUILDING CONDITIONS

a) Applicants shall be encouraged to develop neighborhoods that provide for "eyes on the street". Living areas such as kitchens, eating areas, informal living rooms, and office/den spaces should be provided on the front of residential units. This will allow for the "natural visibility" of roadways by residents during the normal course of their days. Would-be burglars don't like the possibility of being visible

The Sacramento County Sheriff's Department serving the citizens of Rancho Cordova

Letter B Continued

PAM JOHNS
March 24, 2006
Page 2

to residents. Front porches/patios shall be provided to allow for the natural viewing of the roadways by residents.

b) All homes placed along a public roadway or right-of-way shall be oriented to face the public roadway. This will discourage illegal "car dumps", excessive parking on-street, and other traffic and parking related activities. B-1 cont.

c) All public roadways shall be developed to the specifications of the Fire Marshall to allow for sufficient space for parking on both sides of the street.

3) LAW ENFORCEMENT STAFFFING

The Rancho Cordova Police Department strives to maintain a minimum staffing ratio of 1.3 officers per 1,000 population, to ensure continuation of quality law enforcement and community programs. As residential development is approved, there should be a corresponding increase in patrol staffing to the Police Department. Per City of Rancho Cordova estimates of 2.73 residents per dwelling unit, the Rancho Cordova Police Department will require a total of 283.22 officers once the projects outlined in the General Plan have been built out. B-2

If you should have any questions, please contact me any time at 876-7599.

Very Truly Yours,

THOMAS MCMAHON, CHIEF OF POLICE

CSS III Jeff Rodrigues
Crime Prevention Specialist
Sacramento County Sheriff's Department/Rancho Cordova Police Department
jrodrigues@sacsheriff.com

Letter B Jeff Rodrigues, Rancho Cordova Police Department

Response B-1: General Plan Policy S.7.1 and associated Actions S.7.1.1 and S.7.1.2 include the development and implementation of the Crime Prevention Through Environmental Design (CPTED) principles (which include provisions for improved visibility of streets) as well as adoption and implementation of a uniform security code to ensure that all structures meet applicable security standards.

Response B-2: Comment noted. The following text changes are made to the Draft EIR to match the staff ratio noted by the commenter.

- Draft EIR page 4.12-14, the following change is made to the second paragraph:

  "The City's Police Department utilizes several "in-house" targets for planning purposes, including the goal of providing ~~one~~ 1.3 officers per every 1,000 citizens and one support staff member for every three officers – a standard that was adopted from the Sacramento County Sheriff's Department. Likewise, the Police Department's goal is to maintain an average response time for Priority One calls for service of five minutes or less. A Priority One call is a violent crime against a person or emergencies requiring an immediate response in order to preserve a life. Daily assessments are conducted on a call-by-call basis with the goal of improving the Department's response times."

- Draft EIR page 4.12-16, the following change is made to the last sentence:

  "Based on the SCSD standard of one officer per 1,000 residents, an estimated total of 404 ~~311~~ officers (283 ~~190~~ new officers under buildout conditions) and equipment (i.e., patrol cars, radios, etc) would be required to maintain adequate service levels."

- Draft EIR page 4.12-17, the following changes are made to the second and third full paragraphs:

  Second paragraph

  "Current population within the Planning Area outside of the existing City limits is estimated to be 48,033 persons. Under buildout conditions, the projected population in this area is 108,069 persons, or an increase of 60,036. Based on the SCSD officer per population ratio, an estimated 78 ~~60~~ new officers would be needed to serve the increase in population."

  Third paragraph

  "With an estimated current City population of 55,109 (DOF, 2005), the City is expected to increase by 237 percent or 130,418 persons under buildout conditions. This increase would result in the need for 170 ~~130~~ new sheriff officers to comply with the SCSD officer/population ratio."

Letter C

State of California - The Resources Agency ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
Sacramento Valley - Central Sierra Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA. 95670
916/358-2900

April 28, 2006

MAY 8 2006
PACIFIC MUNICIPAL CONSULTANTS

Mr. Patrick Angell
City of Rancho Cordova Planning Department
2729 Prospect Park Drive
Rancho Cordova, CA 95670

Dear Mr. Angell:

The Department of Fish and Game (DFG) has reviewed the draft Environmental Impact Report (DEIR) for the City of Rancho Cordova's General Plan. The General Plan will guide land use and growth and development on the 20,000 acres within the city limits, as well as the surrounding 58,190-acre landscape (Plan Area) over the next 20 years. The project is located in southeastern Sacramento County and is bounded by the American River on the north, the Cosumnes River flood plain and Sacramento County Urban Services Boundary (USB) on the south and east, and Watt Avenue on the west.

Wildlife habitat resources consist of a variety of habitat types including: a large area of vernal pool grasslands, riparian, permanent, and seasonal wetlands; oak woodlands; and, agricultural land. Significant natural resources include habitat for sensitive species including the following:

Vernal pool tadpole shrimp	(*Lepidurus packardii*)
Vernal pool fairy shrimp	(*Branchinecta lynchi*)
Midvalley fairy shrimp	(*Branchinecta mesovallensis*)
California linderiella	(*Linderiella occidentalis*)
Valley elderberry long-horned beetle	(*Desmocerus californicus dimorphus*)
Bank swallow	(*Riparia riparia*)
Tricolored blackbird	(*Agelaius tricolor*)
Swainson's hawk	(*Buteo swainsoni*)
Burrowing owl	(*Athene cunicularia*)
Western spadefoot	(*Spea hammondii*)
Northwestern pond turtle	(*Clemmys marmorata marmorata*)
Slender Orcutt grass	(*Orcuttia tenuis*)
Sacramento Orcutt grass	(*Orcuttia viscida*)
Boggs Lake hedge hyssop	(*Gratiola heterosepala*)
Ahart's dwarf rush	(*Juncus leiospermus ver. ahartii*)
Sanford's sagittaria	(*Sagittarius sanfordii*)
Legenere	(*Legenere limosa*)

C-1

Conserving California's Wildlife Since 1870

Letter C Continued

Mr. Angell
April 28, 2006
Page 2

In addition, to the American River, Morrison Creek, Laguna Creek, Elder Creek, Buffalo Creek, Frye Creek, and Rebel Hill Ditch flow through the project site. C-1 cont.

General Comments:

The Rancho Cordova General Plan will introduce residential and commercial development into a large area of remnant natural landscape. Table 4.1-1 of the Land Use section of the DEIR indicates that 64% of the existing land use in the Plan Area is, "vacant undeveloped agricultural land." Within this undeveloped landscape Table 4.10-2 indicates that there are 20,727 acres of vernal pool grasslands, containing 630 acres of vernal pools, many, if not most of which provide habitat for sensitive species. It is difficult to overstate the potential for adverse impacts that may result from this project.

Despite the large size Plan Area, its high habitat value, and the great potential for impacts, the DEIR offers very little habitat protection. We believe that the appropriate path would be to design a General Plan that contains a system of habitat preserves that ensures habitat integrity. As it is currently constructed, the Rancho Cordova General Plan defers this important task. Avoidance and mitigation of impacts consist of policies and actions that are too small for the job, lacking the means to bring the needed habitat conservation to fruition. If the City of Rancho Cordova plans to expand into the remaining areas of vernal pool landscapes then the General Plan should contain goals, policies, and actions that address the magnitude of impacts to wildlife resources that are reasonably likely to result from its adoption. The following are specific concerns: C-2

1) The DEIR proposes to mitigate the General Plan's impacts on wildlife through the implementation of General Plan Goals, Policies, and Actions. Implementation of the appropriate Policies and Actions would occur during individual project review through the entitlement process and CEQA analysis. This process involves a substantial risk that any habitat preserves that are created will be small, scattered, and non-viable. It precludes a more comprehensive approach to conservation based on identifying and setting aside high value habitat in large preserves.

   We recommend that the General Plan/DEIR be revised to include a more comprehensive approach to protecting natural resources that mirrors the vernal pool conservation strategy being considered for the South Sacramento Habitat Conservation Plan (SSHCP). The General Plan/DEIR should identify important wildlife habitats in the Plan Area and provide a means of protecting them. As an example, mitigation for habitat losses occurring in currently adopted development projects should be directed toward protecting important habitats within the Plan Area. C-3

2) The organization of the DEIR, makes it difficult to understand the overall impacts to wildlife habitat, as well as, the layout of protected habitat areas. C-4

Letter C Continued

Mr. Angell
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Because Land Use delineations are split into 16 different "Planning Areas" (figures 3.0-4 thru 3.0-18), it's hard to see how the whole picture fits together. There's no easy way to see how, or if, preserves in planning areas with important natural resources connect to each other.

We recommend that the DEIR be revised to include a graphic that illustrates "the big picture" for natural resources. This graphic should show the extent and location of preserves (areas designated Natural Resources, Open Space, etc.) that are designed to include important wildlife habitat, as well as how these preserves are connected to each other and to the larger landscape outside the Plan Area. C-4 cont.

3) Some portions of the Plan Area have significantly greater amounts of natural resources than other portions. Never-the-less, each of the sixteen Planning Areas have a remarkably similar composition of land use designations (residential–mixed density, office mixed use, natural resources, etc.). By treating each Planning Area as if it were of separate and equal natural resource value, the General Plan almost guarantees habitat fragmentation, while at the same time missing an opportunity to increase the quality of natural resource preservation. C-5

We recommend that the DEIR/General Plan be revised to include a description of where the highest natural resource values are located and a means of avoiding impacts to these resources. Avoidance could be accomplished, in part, by shifting development to areas that have fewer natural resources while using areas with higher natural resource value as mitigation sites. Such a scheme might also form that basis of a so-called Environmentally Superior Alternative under the alternatives section of the DEIR.

4) Location of Important Resources:

The Biological Resources section (figures 4.10-1through 4.10-3) as well as maps of the individual Planning Areas give some idea of where impacts to wildlife may occur. However, the DEIR fails to give a clear picture of the location of vernal pools and other important habitats and how they might be impacted by the proposed project.

We recommend that in addition to illustrating the location of California Natural Diversity Database occurrence data, the DEIR contain a map or maps that show the distribution of vernal pools and the location of other important habitats using new or existing sources such as the U.S. Fish & Wildlife Service's "Holland data" or data obtained from the draft South Sacramento HCP. C-6

Letter C Continued

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5) Vernal pool crustaceans:

The DEIR does not adequately address the Planning Area's importance as habitat for vernal pool crustaceans, particularly, the federal-listed endangered vernal pool tadpole shrimp. Although comprehensive surveys for the Central Valley have not been completed, past project-specific surveys indicate that the soils in the Plan Area provide an important habitat for the vernal pool tadpole shrimp.

The Plan Area encompasses a large area with the potential for substantial impacts to vernal pool crustaceans. Therefore, we recommend that the DEIR be revised to include an analysis of the impact of the proposed project upon the vernal pool crustaceans, including the acreage of habitat impacted, the mitigation acreage needed to off-set this impact and the possible locations where the mitigation might occur. The DFG is concerned that there are limited opportunities for adequate mitigation. C-7

6) Vernal Pool Plants:

The DEIR fails to adequately discuss the Planning Area's potential for adverse impacts to sensitive vernal pool plants, particularly the Orcutt grasses. The Planning Area contains almost all of the known occurrences of the Sacramento Orcutt grass. While Figure 4.10-3 indicates the location of these occurrences, there is no discussion of how these occurrences will be conserved as well as the potential for as yet undisclosed occurrences. C-8

We recommend that the DEIR be revised to contain a discussion of how the Orcutt grasses will be conserved. The DEIR should include a description of both the size and location of preserves designed to protect Orcutt occurrences over the long term.

6) Swainson's hawk:

Impact 4.10.3 addresses impacts to "raptors, migratory birds, and other wildlife." Loss of this type of habitat may exceed 28,581 acres, and mitigation is comprised of General Plan Policies and Action, most notably, NR.1 and NR.1.2 as follows: C-9

> NR.1 Incorporate large and interconnected wildlife corridors in new development area to provide ample space for animal movement.
>
> NR.1.2 Conserve Swainson's hawk habitat.

Letter C Continued

Mr. Angell
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The DEIR does not provide a description of what a "large wildlife corridor" consists of and retaining Swainson's hawk foraging habitat preserves within a mixture of residential and commercial development is problematic. Swainson's hawks typically forage over large open areas of unbroken habitat. The information about the mix of land uses shown on the Planning Area maps doesn't include acreages, or minimum patch sizes, but if the large wildlife corridors referred to in Impact 4.10.3 are the same as the natural resources areas delineated on the Planning Area maps then, it's doubtful that these would provide adequate foraging habitat. C-9 cont.

We recommend that the DEIR be revised to contain information about the location and size of habitat areas proposed for mitigation of Swainson's hawk foraging habitat. Furthermore, we recommend that any foraging habitat preserves be located away from residential and commercial growth areas and contiguous with larger open space habitat areas.

Cumulative Impacts

Impact 4.10.8, Cumulative Biological Resources states that the project's impacts are "cumulatively considerable." We agree. The project is surrounded by growth and development. The Cities of Sacramento, Elk Grove, and Folsom have greatly increased their size in recent years. The unincorporated portion of Sacramento County is under similar pressures. Within this context of rapid growth, the DEIR fails to adequately analyze the sum of the separate municipalities in concert with the proposed project and its potential effects.

C-10

With most of the surrounding cities consuming similar types of habitat, we recommend that the DEIR be revised to include a discussion of the General Plan's impacts in the wider context of the remaining vernal pool grasslands in Sacramento County. An adequate discussion would include an examination of what the loss of 28,581 acres of threatened and endangered species habitat may mean to the prospects for long-term survival for species like the Sacramento Orcutt grass, given patterns of growth and development in the surrounding area.

Alternatives

There are minor differences between the Natural Resources Alternative and the No Project Alternative, although, as stated earlier, the division of the Plan Area into 16 separate Planning Areas making a comparison of the alternatives difficult. Based on our best understanding of the Alternatives, DFG recommends the adoption of the No Project alternative. The No Project Alternative retains the most appropriate land use designation (agriculture) on areas with the highest habitat value. C-11

Letter C Continued

Mr. Angell
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In order to better gauge the impact of each alternative on wildlife, we recommend that the Alternatives section be revised to contain illustrations that show the natural resources "big picture" for each of the alternatives. The graphic(s) should show the location of vernal pools and other important natural resources in relation to planned land uses (residential, commercial, etc.) for each of the alternatives. C-11 cont.

In conclusion, this project will have a significant impact to fish and/or wildlife habitat. Assessment of fees under Public Resources Code Section 21089 and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project applicant upon filing of the Notice of Determination by the lead agency. C-12

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

Thank you for the opportunity to review this project. If the DFG can be of further assistance, please contact Mr. Dan Gifford, Senior Wildlife Biologist, telephone (209) 369-8851 or Mr. Kent Smith, telephone (916) 358-2382.

Sincerely,

Kent Smith
Acting Assistant Regional Manager

cc: Ms. Holly Herod
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W2605
Sacramento, CA 95825-1888

Mr. Dan Gifford
Department of Fish and Game
Sacramento Valley-Central Sierra Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670

Letter C Kent Smith, State of California Department of Fish and Game

Response C-1: Comment noted. Draft EIR pages 4.10-3 through –29 identify the habitat conditions and sensitive species noted by the commenter, while Draft EIR pages 4.9-1 through –3 note the surface water features identified by the commenter.

Response C-2: The commenter's desire for the proposed General Plan to establish a system of habitat preserves is noted. As shown in Draft EIR Figures 3.0-7 and 3.0-9 through 3.0-15 illustrate the draft concept land use plans for the East, Grant Line North, Grant Line South, Grant Line West, Jackson, Mather, Rio del Oro and Suncreek/Preserve planning areas that are located within the vernal pool grassland habitats shown in Draft EIR Figure 4.10-1. While these draft concept land use plans are conceptual and do not constitute site-specific land use plans for these planning areas, they do set forth "Natural Resources" designated areas (General Plan land use designation intended for natural habitat areas to not be developed) that are proposed to interconnect among several of the planning areas (e.g., interconnections of Natural Resources designated areas occurs between the Suncreek/Preserve, Grant Line North and Grant Line South planning areas as well as between the Mather and Jackson planning areas). The proposed General Plan would designate approximately 11,115 acres as "Natural Resources", which consists of 19 percent of the overall Planning Area for the City of Rancho Cordova General Plan (58,190 acres).

In addition to the designation of Natural Resources, the proposed General Plan and Draft EIR does include proposed policies and actions (e.g., Draft EIR pages 4.10-39 through –43) that provide for protection and mitigation of impacts to biological resources and meet the definition of performance standards. The use of performance standard mitigation is allowed under State CEQA Guidelines Section 15126.4(a) and is supported by case law (*Sacramento Old City Association v. City Council of Sacramento* [3d. Dist 1991] 229 Cal.App.3d 1011, 1028 [280 Cal.Rptr. 478]). Examples of such measures include General Plan policies NR.1.1, NR.2.1 and NR.3.2; actions NR.1.1.1, NR.3.4.1, NR.4.1.1 and NR 4.1.3; and mitigation measures MM 4.10.1a through e and 4.10.5a through c. These policies and action items are intended to avoid preserving habitat that is too small and/or segmented to be effective. However, the Draft EIR identifies that even with implementation of these provisions, impacts to biological resources of concern would remain significant and unavoidable given the proposed alteration of habitat conditions of the entire General Plan Planning Area (Draft EIR pages 4.10-32 through –68). Since public release of the Draft EIR and General Plan on March 13, 2006, the City has added the following policy to the Natural Resources Element of the General Plan:

Policy NR.1.6 – Participate in the development of a habitat conservation plan to address the unique biological resources in Rancho Cordova.

The commenter is referred to Response to Comment 8-4, 8-5 and 8-11 regarding additional modification to Draft EIR mitigation measures regarding biological resources.

Response C-3: The commenter is referred to Response to Comment C-2. Draft EIR pages 4.10-1 through –28 include descriptions and mapping of habitat conditions (including habitat conditions that support special-status plant and wildlife species) in the 58,190-acre Planning Area. Regarding the SSHCP, there are currently no specific strategies or mapping of proposed conservation areas that have been publicly released. The City has made several requests for SSHCP habitat mapping from Sacramento County throughout the course of the preparation of the General Plan, which have been denied.

Response C-4: The Draft EIR contains clear descriptions and mapping of existing habitat conditions in the Planning Area (see Draft EIR pages 4.10-1 through –28) as well as the methodology and anticipated worst case direct and indirect impacts to habitat conditions and associated biological resources including habitat impact estimates (Draft EIR pages 4.10-32 through –68). Given the scale of the overall Planning Area (58,190 acres), there is not an effective way to illustrate for the entire Planning Area detailed habitat conditions (e.g., vernal pool locations and distributions) and proposed General Plan land uses on a map that would be legible in an EIR document. Draft EIR Figures 3.0-7, and 3.0-9 through 3.0-15, illustrate the draft concept land use plans for the East, Grant Line North, Grant Line South, Grant Line West, Jackson, Mather, Rio del Oro and Suncreek/Preserve planning areas, mapped on aerial photography that provides some illustration of underlying habitat conditions. The commenter is referred to Response to Comment C-2 regarding the connectivity of designated Natural Resources areas in individual planning areas.

Response C-5: For purposes of CEQA compliance, the Draft EIR assumes that any habitat in the Planning Area that has potential to support special-status plant or wildlife species has high resource value (see Draft EIR Tables 4.10-4 through 4.10-6). The draft concept land use plans for the East, Grant Line North, Grant Line South, Grant Line West, Jackson, Mather, Rio del Oro and Suncreek/Preserve planning areas were developed with the designation of "Natural Resources" on land areas where habitat areas have been preliminarily identified as having high resource value. Consequently, the General Plan and Draft EIR take into consideration where the highest resource values are located, based on the information currently available. Accordingly, we do not agree with the comment that, by treating each planning area as if it were of separate and equal natural resource value, the General Plan "almost guarantees habitat fragmentation." These land use maps are conceptual and will likely be refined as site-specific details of the individual planning areas are identified, which could involve further expansion of the "Natural Resources" designation to conserve additional habitat areas. As identified on Draft EIR pages 6.0-40 through –57, Alternative 3 (Natural Resources Conservation Alternative) was based on consultation with

Sacramento County staff currently preparing the SSHCP, and on the conceptual-level strategy for the Sunrise-Douglas Community Plan Area developed by the U.S. Fish and Wildlife Service, the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers.

Response C-6: The commenter is referred to Response to Comment C-3 and C-4.

Response C-7: Draft EIR Impact 4.10.1 and 4.10.2 specifically addresses impacts of implementation of the proposed General Plan on endangered, threatened and other special-status species, which include the consideration of vernal pool crustaceans (Draft EIR pages 4.10-34 through –48). The Draft EIR specifically included consideration of the federally-listed vernal pool tadpole shrimp as well as vernal pool fairy shrimp (Draft EIR Table 4.10-4). As identified in Draft EIR Tables 4.10-5 and 4.10-6, implementation of the proposed General Plan land uses could result in the direct loss of up to 676 acres of vernal pool and vernal pool grassland habitats, and indirectly impact up to 2,993 acres of vernal pool and vernal pool grassland habitats.

The commenter expresses concern that there are limited opportunities for adequate mitigation to offset the impact on these species. The proposed General Plan and Draft EIR include mitigation for these impacts including no net loss of wetlands (which is consistent with federal and state policies) (Policy NR.2.1), performance standards for preserves (Action NR.3.4.1), provision of interconnected wildlife corridors (Policy NR.1.1) and mitigation measures MM 4.10.1a through e and MM 4.10.5a through c. In addition, since public release of the Draft EIR and General Plan on March 13, 2006, the City has added the following policy to the Natural Resources Element of the General Plan:

Policy NR.1.6 – Participate in the development of a habitat conservation plan to address the unique biological resources in Rancho Cordova.

These mitigation provisions in the General Plan and Draft EIR could involve the provision of wetland/vernal pool preserves in the City or elsewhere in the region. Given the programmatic nature of the Draft EIR and General Plan, it would speculative to try to identify exact mitigation methods that will be used. The Draft EIR concludes that impacts to special-status plant and wildlife species (under Impact 4.10.1 and 4.10.2) are significant and unavoidable given the large-scale change in habitat conditions of the overall Planning Area from implementation of the General Plan. The commenter is referred to Response to Comment 8-4, 8-5 and 8-11 regarding additional modification to Draft EIR mitigation measures regarding biological resources.

Response C-8: The commenter is referred to Response to Comment C-2, C-7 and 8-11 for discussion of impacts to special-status plant species and other biological resources. Impacts to Sacramento orcutt grass are specifically addressed under Draft EIR Impact 4.10.1 (Draft EIR pages 4.10-34 through –43). Several General Plan policies and action items in the discussion under Impact 4.10.1 discuss the preservation and treatment of resources such as orcutt grass.

Response C-9: The City is currently in the process of developing a Swainson's Hawk Ordinance to address the loss of foraging habitat and develop appropriate and adequate mitigation to fully mitigate development impacts on foraging habitat, consistent with General Plan Action NR.1.2.1. While some proposed Natural Resources designated areas (e.g., large Natural Resources designated areas in the Mather, Jackson and Rio del Oro planning areas) would likely provide opportunities for the retention of foraging habitat in the overall Planning Area, it is acknowledged that other proposed Natural Resources designated areas would not be of adequate size to support Swainson's hawk foraging habitat. As identified in Response to Comment 8-5, modifications have been made to Policy NR.1.2.1 to clarify the performance standards to ensure that foraging habitat impacts are mitigated. The use of performance standard mitigation is allowed under State CEQA Guidelines Section 15126.4(a) and is supported by case law (*Sacramento Old City Association v. City Council of Sacramento* [3d. Dist 1991] 229 Cal.App.3d 1011, 1028 [280 Cal.Rptr. 478]).

Response C-10: The cumulative impact analysis takes into account development beyond the cities of Sacramento, Elk Grove and Folsom. As specifically noted on Draft EIR page 4.10-63, the cumulative analysis takes into account Sacramento, Placer, Sutter and El Dorado counties, and the associated development anticipated in these jurisdictions, which is consistent with CEQA provisions (i.e., Guidelines Section 15130) regarding the consideration of the cumulative setting (Draft EIR pages 4.0-9 and –10). The commenter provides no evidence to suggest that the cumulative setting and associated impact analysis fails to adequately analyze the cumulative impacts of the General Plan. In addition, the Draft EIR acknowledges that the overall Planning Area contains a large percentage of vernal pool and vernal pool grasslands in Sacramento County that would be adversely impacted by implementation of the proposed General Plan, and identified that this impact is cumulatively considerable and significant and unavoidable under CEQA (Draft EIR page 4.10-64).

Response C-11: The commenter's support of the No Project Alternative is noted. However, the commenter does not identify which No Project Alternative is preferred (The Draft EIR evaluated two "no project alternatives" – Sacramento County General Plan Alternative and the Existing City Boundary General Plan Alternative). Consistency of these alternatives to the project objectives is identified on Draft EIR pages 6.0-80 and –81. The commenter is referred to Response to Comment C-4 regarding the requested "big picture" graphics (Draft EIR Figures 6.0-3a through h shows the Natural Resources Conservation Alternative mapped on aerial photography that provides some illustration of underlying habitat conditions).

Response C-12: Comment noted. The City will be required to pay fees at the time of posting the Notice of Determination for the General Plan. The City will also notify the California Department of Fish and Game of public hearings to consider certification of the Final EIR and adoption of the proposed General Plan.

Letter D

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

Memorandum

Date: March 28, 2006

To: All Reviewing Agencies

From: Scott Morgan, Senior Planner

Re: SCH # 2005022137
Rancho Cordova General Plan

The Lead Agency has corrected some information regarding the above-mentioned project. Please see the attached materials for more specific information. D-1

APR 3 2006
PACIFIC MUNICIPAL CONSULTANTS

cc: Patrick Angell
City of Rancho Cordova
2729 Prospect Park
Rancho Cordova, CA 95670

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Letter D Continued

CITY OF RANCHO CORDOVA
CALIFORNIA
Incorporated 2003

RECEIVED
MAR 27 2006
STATE CLEARING HOUSE

Robert McGarvey
Mayor

David Sander
Vice Mayor

Linda Budge
Councilmember

Ken Cooley
Councilmember

Dan Skoglund
Councilmember

Planning Department

March 27, 2006

RE: Rancho Cordova General Plan Draft EIR (State Clearinghouse No. 2005022137) – Clarification of Information on CDs

It has come to the City of Rancho Cordova's attention that the CDs containing the Rancho Cordova General Plan Draft EIR have the following errors:

General Plan Draft EIR Section 4.1 (Land Use) - Pages 4.1-1 through 4.1-9 of this section contained in the Draft Environmental Impact Report - Full Document PDF document (20 MB in size) were accidentally omitted as a result of a production error. The individual 4.1 Land Use PDF document (8.78 MB in size) provided on the CD does not contain this error and remains correct.

General Plan Draft EIR Section 6.0 (Project Alternatives) – The figures that illustrate the alternatives in the individual 6.0 Alternatives PDF document (424 KB) were accidentally omitted as a result of a production error. The Draft Environmental Impact Report - Full Document PDF document (20 MB in size) provided on the CD does contain the figures and remains correct.

The City has extended the public comment period by seven days associated with these errors. **The Draft EIR comment period, which is now been extended to 52 days, will now end on May 4, 2006.** The City will provide corrected CDs of the Rancho Cordova General Plan Draft EIR upon request.

Email – Both Documents
generalplan@cityofranchocordova.org

Postal Mail – General Plan
Rancho Cordova General Plan
C/O Pam Johns, General Plan Manager
2927 Prospect Park Drive
Rancho Cordova, CA 95670

Postal Mail – EIR
Rancho Cordova General Plan EIR
C/O Patrick Angell, EIR Manager
2927 Prospect Park Drive
Rancho Cordova, CA 95670

A public meeting to receive comments regarding the adequacy of the Draft EIR has been scheduled for April 13, 2006 at 6:00 pm at City of Rancho Cordova City Hall (2729 Prospect Park Drive, Rancho Cordova, CA 95670) before the Planning Commission. Public hearings for the General Plan will be scheduled in the coming weeks. The City anticipates adoption of the General Plan and certification of the Final EIR by June 30, 2006. For more information on the General Plan, visit www.gp.cityofranchocordova.org or call 916-361-8384.

Sincerely,

Patrick Angell, AICP
Rancho Cordova General Plan EIR Manager

2729 Prospect Park Drive, Rancho Cordova, CA 95670 • (916) 851-8700 • Fax (916) 851-8787 • www.cityofranchocordova.org

Letter D Continued

See NOTE below

SCH # 2005022137

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 – 916/445-0613

Notice of Completion and Environmental Document Transmittal Form

RECEIVED
MAR 1 3 2006
STATE CLEARING HOUSE

1. Project Title: Rancho Cordova General Plan
2. Lead Agency: City of Rancho Cordova
3. Contact Person: Patrick Angell
3a. Street Address 2729 Prospect Park Drive
3b. City: Rancho Cordova
3c. County: Sacramento
3d. Zip 95670
3e. Phone: (916) 361-8384

Project Location: The Planning Area for the City of Rancho Cordova General Plan consists of the existing incorporated City and a larger study area known as the General Plan Planning Area (95.8 square miles, 61,296 acres). The Rancho Cordova General Plan Planning Area includes the City of Rancho Cordova, Gold River, Rosemont, Mather Field, and the Aerojet lands. The Planning Area is generally bounded by Watt Avenue to the west, the American River to the north, Prairie City Road to the east, and Jackson Highway to the south.

4. County: Sacramento
4a. City/Community: Rancho Cordova
4b. Assessor's Parcel No. N/A
4c. Section _____ Twp. _____ Range _____
5a. Cross Streets: N/A
5b. For Rural, Nearest Community:
6. Within 2 miles: a. State Hwy #: State Route 16 b. Airports: Mather Airport c. Railways: Union Pacific /Regional Trans
d. Waterways: Folsom South Canal, American River, Cosumnes River

7. Document Type

CEQA	NEPA	OTHER
01. θ NOP	09. θ NOI	13. θ Joint Document
02. θ Early Cons	08. θ FONSI	14. θ Final Document
03. θ Neg Dec	11. θ Draft EIS	15. θ Other
04. • Draft EIR	12. θ EA	
05. θ Supplement/Subsequent EIR (Prior SCH No. _____)		
06. θ NOE		
07. θ NOC		
08. θ NOD		

8. Local Action Type

01. θ General Plan Update	05. θ Annexation	09. θ Rezone	12. θ Waste Mgmt Plan
02. θ New Element	06. θ Specific Plan	10. θ Land Division (Subdivision, Parcel Map, Track Map, etc.)	13. θ Cancel Ag Preserve
03. θ General Plan Amendment	07. θ Community Plan	11. θ Use Permit	14. • Other
04. θ Master Plan	08. θ Redevelopment		

9. Development Type

	Units	Acres:			
01. θ Residential			07. θ Mining	Mineral _____	
02. θ Office	Sq.ft. ___	Acres ___	Employees ___	08. θ Power	Type _____
03. θ Shopping/Commercial	Sq.ft. ___	Acres	Employees ___	09. θ Waste Treatment	Type _____
04. θ Industrial	Sq.ft. ___	Acres ___	Employees ___	10. θ OCS Related	
05. θ Water Facilities	MGD _____			11. • Other:	
06. θ Transportation Type _____					

10. Total Acres: 61,296 acres
11. Total Jobs Created: Unknown

12. Project Issues Discussed in Document

01. • Aesthetic/Visual	09. • Geologic/Seismic	17. θ Social	25. • Wetland/Riparian
02. • Agricultural/Land	10. • Jobs/Housing Balance	18. • Soil Erosion	26. • Wildlife
03. • Air Quality	11. • Minerals	19. • Solid Waste	27. • Growth Inducing
04. • Archaeological/Historical	12. • Noise	20. • Toxic/Hazardous	28. • Incompatible Land Use
05. θ Coastal Zone	13. • Public Services	21. • Traffic/Circulation	29. • Cumulative Effects
06. θ Economic	14. • Schools	22. • Vegetation	30. θ Other _____
07. • Fire Hazard	15. • Septic Systems	23. • Water Quality	
08. • Flooding/Drainage	16. • Sewer Capacity	24. • Water Supply	

13. Funding (approx) Federal $ _____ State $ _____ Total $ _____

14. Present Land Use & Zoning: Various

15. Project Description: The proposed City of Rancho Cordova General Plan would replace the existing General Plan, which the City adopted from Sacramento County upon incorporation in July 2003. The City's proposed General Plan and associated land use map would generate additional residential, commercial, office, and recreational uses throughout the entire General Plan Planning Area and include substantial improvements to the roadway system.

State Clearinghouse Contact: (916) 445-0613

State Review Began: 3 - 13 - 2006

SCH COMPLIANCE 4 - 26 - 2006

Please note State Clearinghouse Number (SCH#) on all Comments

SCH#: 2005022137

Please forward late comments directly to the Lead Agency

AQMD/APCD 25

(Resources: 3 / 18)

Project Sent to the following State Agencies

X Resources	State/Consumer Svcs
___ Boating & Waterways	___ General Services
___ Coastal Comm	Cal EPA
___ Colorado Rvr Bd	___ ARB – Airport Projects
X Conservation	___ ARB – Transportation Projects
X Fish & Game # 2	___ ARB – Major Industrial Projects
___ Delta Protection Comm	___ Integrated Waste Mgmt Bd
___ Forestry & Fire Prot	___ SWRCB: Clean Wtr Prog
___ Historic Preservation	___ SWRCB: Wtr Quality
X Parks & Rec	___ SWRCB: Wtr Rights
___ Reclamation Board	X Reg. WQCB # 5
___ Bay Cons & Dev Comm	___ Toxic Sub Ctrl-CTC
X DWR	Yth/Adlt Corrections
X OES (Emergency Svcs)	___ Corrections
Bus Transp Hous	**Independent Comm**
X Aeronautics	___ Energy Commission
X CHP	X NAHC
X Caltrans # 3	___ Public Utilities Comm
___ Trans Planning	X State Lands Comm
X Housing & Com Dev	___ Tahoe Rgl Plan Agency
___ Food & Agriculture	
X Health Services	___ _____ Conservancy
	___ Other: _____

Letter D Scott Morgan, Governor's Office of Planning and Research State Clearinghouse and Planning Unit

Response D-1: The information provided by the commenter is a copy of the City's initial extension of the comment period to May 4, 2006. As noted in Section 1.0 (Introduction) of this document, the Rancho Cordova City Council further extended the comment period to May 15, 2006.

Letter E

Members of the Board:
Jeanette J. Amavisca
Pollyanna Cooper-LeVangie
Priscilla S. Cox
Pamela A. Irey
William H. Lugg, Jr.
Chet Madison, Sr.
Brian D. Myers

Constantine I. Baranoff
Associate Superintendent,
Facilities and Planning

Robert L. Trigg Education Center
9510 Elk Grove-Florin Road, Elk Grove, CA 95624

(916) 686-7711
FAX: (916) 686-7754

May 4, 2006

MAY 11 2006
PACIFIC MUNICIPAL CONSULTANTS

Mr. Patrick Angell
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova, CA 95670

Subject: Comments on the Rancho Cordova General Plan DEIR

Mr. Angell:

This letter is in response to your request for comments on the Rancho Cordova General Plan Draft Environmental Impact Report. We have updates/corrections on several pages as noted below.

Public Services and Utilities, Page 4.12-71:
Please make the following corrections:

The Elk Grove ~~u~~Unified School District (EGUSD) has more than doubled in the past decade and is expected to experience the same level of growth through 2010. The District covers nearly 320 square miles and has been in existence for over 41 years. The EGUSD boundaries encompass the entire City of Elk Grove, portions of the City of Sacramento and the City of Rancho Cordova, and most of southern Sacramento County. The District currently serves more than ~~52,500~~ 60,000 students and expects to reach ~~80,000~~ 73,000 students by 2010. Due to constant increases in population, the Elk Grove Unified School District has made several adjustments to its ~~district~~ school boundaries over the past 5 years.

According to EGUSD, enough new families move into the District to fill a classroom every ~~three to five days~~ week. To keep up with this growth, the district will need to build approximately ~~four~~ two schools every year. These schools are needed to accommodate growth. ~~and allow the district to lower the enrollments at its middle and high schools.~~ As the district opens new schools, school boundaries will also change. With more than 320 square miles, the district will continue to grow for the foreseeable future. Elk Grove will need to house a projected enrollment of ~~80,000~~ 73,000 students by 2010, and thousands of homes are scheduled to be built after 2010. E-1

Public Services and Utilities, Pages 4.12-74 and 4.12-77:
Please update the EGUD student generation rates to those approved by our Board of Education on April 18, 2006. The updated rates are as follows: E-2

	Single-Family Residence		Multi-Family Residence	
Elementary (K-6)	~~0.4398~~	0.4367	~~0.3057~~	0.2523
Middle (7-8)	~~0.1238~~	0.1222	~~0.0730~~	0.0654
High (9-12)	~~0.2007~~	0.2181	~~0.1587~~	0.1421
Total	~~0.7643~~	0.7771	~~0.5374~~	0.4598

Letter E Continued

May 4, 2006
Mr. Patrick Angell
Page 2

Please let us know if you have additional questions or would like clarification for the above changes. My telephone number is (916) 686-7711, and email is mgrambus@egusd.net. Thank you for the opportunity to comment on this document.

Sincerely,

Marcia Grambusch

Marcia Grambusch
Planner

RanchoCordovaGPComments2.doc

cc: Kim Williams
Marnie Rosenstein
Steve Looper

Letter E Marcia Grambusch, Elk Grove Unified School District

Response E-1: Comment noted. The following text changes are made to the Draft EIR:

- Draft EIR page 4.12-71, the following changes are made to the first and second paragraphs:

  "The Elk Grove ~~unified~~ Unified School District (EGUSD) has more than doubled in the past decade and is expected to experience the same level of growth through 2010. The District covers nearly 320 square miles and has been in existence for over 41 years. The EGUSD boundaries encompass the entire City of Elk Grove, portions of the City of Sacramento and the City of Rancho Cordova, and most of southern Sacramento County. The District currently serves more than ~~52,500~~ 60,000 students and expects to reach 73,000~~80,000~~ students by 2010. Due to constant increases in population, the Elk Grove Unified School District has made several adjustments to its ~~district~~ school boundaries over the past 5 years.

  According to EGUSD, enough new families move into the District to fill a classroom every week ~~three to five days~~. To keep up with this growth, the district will need to build approximately ~~four~~ two schools every year. These schools are needed to accommodate growth. ~~and allow the district to lower the enrollments at its middle and high schools.~~ As the district opens new schools, school boundaries will also change. With more than 320 square miles, the district will continue to grow for the foreseeable future. Elk Grove will need to house a projected enrollment of ~~80,000~~ 73,000 students by 2010, and thousands of homes are scheduled to be built after 2010."

Response E-2: Comment noted. The following text changes are made to the Draft EIR based on the recent information provided by the commenter in its letter:

- Draft EIR page 4.12-74, the following changes are made to Draft EIR Table 4.12.6-6:

TABLE 4.12.6-6
STUDENT GENERATION RATES FOR THE EGUSD

School Type	Single Family Residence (K-12 students/residence)	Multi-Family Residence (K-12 students/residence)
Elementary (K-6)	~~0.4398~~ 0.4367	~~0.3057~~ 0.2523
Middle 7-8)	~~0.1238~~ 0.1222	~~0.0730~~ 0.0654
High (9-12)	~~0.2007~~ 0.2181	~~0.1587~~ 0.1421
Total	~~0.7643~~ 0.7771	~~0.5374~~ 0.4598

Source: ~~EGUCD School Facilities Master Plan, 2002-2010~~ Grambusch, 2006

Letter F

MAY-15-2006 MON 04:12 PM FAX NO. P. 01

Municipal Services Agency

Planning and Community Development
Robert Sherry, Director

Larry Brooks, Code Compliance
Leighann Moffitt, Long Range Planning
Dave Pevny, Community Planning
Ana Rhodes, Administration
Tricia Stevens, Special Projects
Michael Tateishi, Accounting & Fiscal Services

County of Sacramento

Terry Schutten, County Executive
Cheryl Creson, Agency Administrator

May 10, 2006

Patrick Angell
City of Rancho Cordova Planning Department
2729 Prospect Park Drive
Rancho Cordova, CA 95670

RE: Rancho Cordova General Plan – Draft Environmental Impact Report

Dear Mr. Angell:

Thank you for the opportunity to review the above-captioned report. The staff of Sacramento County's Planning and Community Development Department, Department of Transportation and Economic Development Department has reviewed the document and offers the following comments:

General Comment:

As described in the Draft Environmental Impact Report, the Rancho Cordova General Plan Planning Area is comprised of 16 individual Planning Areas. Several of the Planning Areas are located outside of the Rancho Cordova city limits and are within the jurisdiction of Sacramento County. While Sacramento County supports the identification of Planning Areas and the demarcation of a Planning Area boundary, we are concerned that to date, the City of Rancho Cordova has not consulted Sacramento County regarding Concept Plans prepared for lands located within the unincorporated area of the county.

Additionally, Sacramento County is concerned that the Rancho Cordova General Plan purports the annexation of these Planning Areas, including the Jackson Planning Area, within the planning horizon of the General Plan. We have concerns regarding the annexation of this area since the Sacramento County General Plan Update has earmarked the Jackson Corridor as a key area to accommodate a significant portion of the 99,700 housing unit growth anticipated for the unincorporated area, as projected by the SACOG's Blueprint Vision. Sacramento County Board of Supervisors has endorsed the designation of the Jackson Corridor area as a new urban growth area, as part of the County's General Plan Update process. F-1

The Environmental Impact Report does not provide a detailed discussion regarding the provision of infrastructure to serve growth within the Planning Areas, especially water, sewer and roadways. Furthermore, Sacramento County has identified multiple inaccurate designations depicted in Concept F-2

827 7th Steet, Room 230, Sacramento CA 95814 • (916) 874-6141 • fax (916) 874-6400 • www.saccounty.net

Letter F Continued

MAY-15-2006 MON 04:12 PM FAX NO. P. 02

Rancho Cordova General Plan – Draft EIR
Page 2

Plans prepared for the Planning Areas that present significant issues with regard to land use, transportation infrastructure and biological resources. Attachment "A" identifies land use related components of the Concept Plans that are in conflict with Sacramento County's General Plan, adopted Community Plans, draft preservation strategies of the South Sacramento Habitat Conservation Plan (SSHCP), other preservation restrictions, Mather Specific Plan, and County-owned properties. Several of these conflicts present a significant barrier towards the successful implementation of the SSHCP. Attachment "B" lists circulation related issues associated with Roadway System Map (Figure 3.0-19), Draft City Trails and Bikeways Plan (Figure 3.0-20) and Transit System Map (Figure 3.0 -21) of the Draft Environmental Impact Report. F-2 cont.

Although extensive, information provided in Attachments "A" and "B" should not be considered as an all inclusive list of issues. Consultation with Sacramento County staff knowledgeable regarding the issues of concern in the unincorporated area surrounding the City of Rancho Cordova could have minimized the inaccuracies of the Concept Plans. Sacramento County is willing to meet with city staff to address any conflicts or to further assist with the refinement of the Concept Plans.

Please contact Surinder Singh of the Planning & Community Development Department (874-6141), David Norris (874-5049) of the Economic Development Department or Dean Blank of the Transportation Department (874-6121) if you have any questions regarding these comments.

Sincerely,

Robert Sherry
Planning Director

SS:tt:mw

c: Terry Schutten
Surinder Singh
Leighann Moffitt
Anna Whalen
Rich Radmacher
Tim Tadlock
Troy Givans
David Norris
Paul Lake
Dean Blank

SS:tt:mw
Document Name

Letter F Continued

MAY-15-2006 MON 04:13 PM FAX NO. P. 03

ATTACHMENT "A"

East Planning Area:

- Based on draft strategies identified for the South Sacramento Habitat Conservation Plan (HCP), the natural preserves represented in this planning area are not large enough to adequately protect native species and vernal pools. Additionally, the natural preserves would not adequately protect several known species occurrences in this area, including Sacramento Orcutt Grass F-3
- Connections need to be established between the natural preserves in this planning area and other natural preserves outside the planning area. The park designation on the east side of the natural preserve would not provide a suitable linkage between the natural preserve sites on either side of the park. A natural preserve corridor should be considered instead. F-4
- Standard roads through natural preserves create barriers to wildlife passage. Causeways should be considered in these areas to allow for free passage of wildlife. F-5
- The location of Village Centers (VCs) and Local Town Centers (LTCs) along Grant Line road would create an impact on the natural preserve areas shown around them. The location of LTCs surrounded by preserve areas does not create a suitable urban-natural resource interface and is not consistent with either the SACOG Blueprint or the HCP. F-6
- An alternative prepared for the Elk Grove-Rancho Cordova-El Dorado Connector project would place a connector type roadway through the LTCs, effectively bisecting them since minimal connections are planned for the Connector to minimize growth inducing effects. F-7
- Special design features are needed to minimize the potential for future inducement of growth in the residential/estate areas along the edge of the County's Urban Services Boundary. F-8
- Appropriate noise mitigation and buffering techniques are needed due to residential uses proposed adjacent to the Prairie City OHV Park. F-9
- A Greencylce facility is being considered for placement along the northern edge of the planning area. F-10
- Urban uses shown in an area known to suffer from a shortage of water supply availability. Groundwater will not be sufficient to provide water to the area. Surface water rights may not be secured within the time horizon of the General Plan. F-11
- The Sacramento County Regional Sanitation District Sewer Master Plan does not propose any sewer interceptor extension into the area until after 2030, which is beyond the planning horizon of the General Plan. F-12
- Although the East Planning Area is within Sacramento County's Urban Services Boundary (USB), the conceptual roadway circulation is not consistent with the County's Transportation Plan which does not include a roadway circulation. F-13
- The conceptual roadway alignments shown in the planning area differ from the roadway alignments shown on Figure 3.0-19, Roadway System Map. F-14

Letter F Continued

MAY-15-2006 MON 04:13 PM FAX NO. P. 04

Rancho Cordova General Plan – Draft EIR
Page 2

- The post-2030 roadway alignment is inconsistent with and bisects the Prairie City OHV Park. F-15
- The 7,400 acre East Planning Area as proposed accommodates 10,390 dwelling units, 5,644 jobs, and 1,776,000 square feet of commercial, office, and industrial uses. It is unlikely that the proposed 2-lane loop road will accommodate the transportation needs of the proposed development. F-16
- Conversely, the predominance of natural resources, estate/rural residential and mixed density residential in the planning area may not contain sufficient densities to support the "Potential Transit Corridors" shown on Figure 3.0-21, Transit System Map. F-17
- Given the multitude of natural resources in the planning area, an off-street trail system in addition to the Class II bike Lanes shown in Figure 3.0-20, City Trails and Bikeway Plan, may provide recreational and commuter opportunities to the community. F-18
- Under 2030 conditions, Grant Line Road is projected to accommodate over 61,000 ADT and White Rock Road, 51,800 ADT. A traditional intersection at this location will likely lead to poor levels of service and long vehicle queues on both roadways. It is highly recommended that a grade separation structure be considered at this location. F-19
- One of the conceptual alignments of the Elk Grove-Rancho Cordova-El Dorado Connector Project is along Grant Line Road to White Rock Road. The roadway classification should recognize and include flexibility to accommodate a regional transportation facility with limited access F-20

Grant Line South Planning Area:

- The region bounded by Sunrise Boulevard, Jackson Highway, and Grant Line Road should be preserved as it contains a large concentration of high quality vernal pools. Residential designation has been identified on land likely to be purchased as a preserve. F-21
- The natural preserves within the planning area do not have sufficient connection, isolating the natural preserves and dramatically limiting their functionality. This is inconsistent with Rancho Cordova's policy NR.1.1, which indicates that Rancho Cordova plans to "Incorporate large and interconnected wildlife corridors into new development areas to provide ample space for animal movement". F-22
- The two planned VCs on Jackson Highway are immediately adjacent to natural resource preserves and would create an impact on these natural preserves. These VCs are also located at areas that could serve as a corridor to connect natural resource preserves in this planning area to those in the Grant Line North Planning Area. F-23
- The Upper Laguna Creek Collaborative is considering a 600 ft. buffer along Laguna Creek. A planned VC on Sunrise and Jackson Highway would not allow for the 600 ft. buffer to be maintained. The natural preserve corridor shown would not be of sufficient width to accommodate habitat for wildlife movement or groundwater recharge. F-24

SS:tt:mw
RCGPCommentsDEIR"A"

Letter F Continued

MAY-15-2006 MON 04:13 PM FAX NO. P. 05

Rancho Cordova General Plan – Draft EIR
Page 3

- Long, narrow natural resource preserves bordered on each side by a road and proposed residential development would have enormous "edge effects" and potentially render the preserve useless as wildlife habitat. F-25
- Sacramento County owns several large parcels in this planning area which are shown to have residential land-uses designated within the planning area. This is inconsistent with land use designations Sacramento County has identified for this land. F-26
- Uses indicated along the Urban Services Boundary could have a growth inducing effect along the boundary. F-27
- An alternative plan prepared for the Elk Grove-Rancho Cordova-El Dorado Connector would place it through the VC and LTC, effectively bisecting them since minimal connections are planned for the Connector to minimize growth inducing effects. F-28
- The VC area should consider a 600-foot buffer corridor, as recommended by the Upper Laguna Creek Collaborative. F-29

Grant Line North Planning Area:

- A 2000 ft. buffer is established and necessary around the existing Kiefer Landfill to minimize its impact on surrounding land uses, including potential groundwater contamination. The concept plan prepared for the planning area designates residential uses within the established 2000 ft. buffer – future residential uses may be unnecessarily exposed to undesirable impacts from the landfill. F-30
- Sacramento County owns several large parcels in this planning area which are shown to have residential land-uses designated within the planning area. This is inconsistent with land use designations shown on the County's General Plan. F-31
- The Upper Laguna Creek Collaborative is considering a 600 ft. buffer along Laguna Creek. A planned VC on Rancho Cordova Parkway at the crossing of Laguna Creek would not allow for the 600 ft. buffer to be maintained. The natural preserve corridor shown would not be of sufficient width to accommodate habitat for wildlife movement or groundwater recharge. F-32
- The planned VC on Rancho Cordova Parkway at the crossing of Laguna Creek interferes with a natural resource corridor that would connect two large natural resource areas within the planning area. F-33
- There are insufficient connections between the planned natural preserves within the planning area as well as maximization of their connection to other planned natural resource preserves in other planning areas. F-34

SS:tt:mw
RCGPCommentsDEIR"A"

Letter F Continued

MAY-15-2006 MON 04:14 PM FAX NO. P. 06

Rancho Cordova General Plan – Draft EIR
Page 4

Grant Line West Planning Area:

- The natural resource preserve area along the north side of Douglas Road is not of sufficient size to accommodate any habitat of value and would likely be further degraded by its proximity to Douglas Road and the planned residential development. F-35
- The small natural resource preserve located in the southern portion of the planning area and completely surrounded by residential development would have minimal habitat value. F-36
- The Aerojet Planning Area indicates a long strip of Light Industrial development along the north side of White Rock Road. This may result in possible land use conflicts since the area south of White Rock Road is shown for residential development. F-37
- The VC at the intersection of Hazel Avenue and White Rock Road is not noted in the Aerojet Planning Area and an interface between the VC and the surrounding high density residential development planned for the area should be discussed. F-38
- The LTC shown at the intersection of Douglas Road and Grant Line Road should not extend beyond Grant Line Road to the east so that vital natural resources can be further preserved and impacts to these resources minimized. F-39

Mather Planning Area

- Land uses identified in the Concept Map and proposed roadways shown in the General Plan Traffic Study Area (Figure 4.5-1) are inconsistent with the plan reviewed and conceptually endorsed by the Board of Supervisors for the South Mather area on February 22, 2006. The following are a few examples of the inconsistencies. The existing golf course is the only active regional park area. The configuration of the natural resource area is different than the County's configuration of the conceptual wetlands preserve area. Heavy Industrial land uses are designated over portions of the County's conceptual wetlands preserve area. The Economic Development Parcel east of Eagles Nest Road is identified as Public/Quasi-Public use. The Concept Plan identifies new roadway alignments through portions of the County's conceptual wetlands preserve area. F-40

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Letter F Continued

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ATTACHMENT "B"

Roadway System Map (Figure 3.0-19)

- Roadway classification, "6 Lanes with Special Treatment". Neither the General Plan nor Figure 3.0-19 describes the characteristics of this roadway facility. How does it differ from the "6 Lanes" and "6 Lane Expressway" roadway classifications? F-41
- The roadway alignments shown in the planning area maps differ from the roadway alignments shown on Figure 3.0-19, Roadway System Map. F-42
- Under 2030 conditions, Grant Line Road is projected to accommodate over 61,000 ADT and White Rock Road, 51,800 ADT. A traditional intersection at this location will likely lead to poor levels of service and long vehicle queues on both roadways. It is highly recommended that a grade separation structure be considered at this location. F-43
- The County's General Plan designates SR 16 (Jackson Road) as a 4-lane arterial east of Grant Line Road. F-44
- The County's General Plan designates Sunrise Blvd. as a 6-lane limited access thoroughfare north of Grant Line Road. F-45
- Although the County's General Plan designates Grant Line Road as a 6-lane thoroughfare, given the potential for Grant Line Road to function as the Elk Grove-Rancho Cordova-El Dorado Connector (EG-RC-ED Connector), the 6-lane Expressway classification seems to be appropriate and will likely be reclassified in the County's General Plan update. F-46
- Although the County's General Plan designates White Rock Road as a 6-lane thoroughfare west of Grant Line Road and a 2-lane rural collector east of Grant Line Road, given the potential for White Rock Road to function as the EG-RC-ED Connector and the projected heavy travel demand, the 6-lane Expressway classification seems to be appropriate and will likely be reclassified in the County's General Plan update. F-47
- Although the East Planning Area is within Sacramento County's Urban Services Boundary (USB), the conceptual roadway circulation is not consistent with the County's Transportation Plan which does not include a roadway circulation. F-48
- To minimize impacts to biological resources, the Sacramento County Board of Supervisors has conceptually approved alternative roadway alignments for the extensions of Douglas Road, Excelsior Road, and Eagles Nest Road as part of the South Mather Master Plan and General Plan and Specific Plan Amendments. The Roadway System Map and Mather Planning Area Map should reflect the roadway alignments as shown on the South Mather Master Plan. Also note that the extension of Chrysanthy Blvd and Routier Road through south Mather is neither recognized nor is a viable option due to impacts to biological resources. F-49
- We assume that the extension of Mather Field Road through the air field would be via a tunnel. Although there are no immediate concerns regarding the tunnel as a transportation facility, there may be other concerns related to airport security that may make the facility unfeasible. F-50
- The County's General Plan designates Florin Road as a 6-lane thoroughfare. F-51

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- The County's General Plan designates Excelsior Road and Eagles Nest Roads as 4-lane arterials. F-52
- The County's General Plan does not indicate the extension of Vineyard Road north of Elder Creek Road nor is there a roadway parallel and between Excelsior Road and Eagles Nest Road. F-53
- The County's General Plan designates Bradshaw Road as a 6-lane thoroughfare. F-54
- The County's General Plan designates Mayhew Road as a 4-lane arterial. F-55
- The County's General Plan designates South Watt Avenue as a 6-lane limited access thoroughfare. F-56
- The County's General Plan designates Old Placerville Road as a 4-lane arterial. F-57
- Although the County's General Plan designates Folsom Blvd as a 6-lane thoroughfare, the County acknowledges that physical constraints exists that may make implementation infeasible beyond a 4-lane roadway. This issue will likely be addressed in the County's General Plan update. F-58
- Although the County's General Plan designates Gold Country Blvd and Coloma Road east of Sunrise Blvd as 4-lane arterials, it is likely that the Board of Supervisors will consider reclassifying these roadways to 2-lane collectors as part of the General Plan Update. F-59
- The County's General Plan designates Sunrise Blvd and Hazel Avenue as 6-lane thoroughfares. F-60
- The County is collaborating with Gencorp in developing a master planned community known as Easton. The roadway classifications and alignments should reflect the latest information available. F-61
- Although the County's General Plan designates Prairie City Road as a 2-lane rural roadway, the 4-lane roadway classification may be appropriate and may be considered for reclassification in the County's General Plan update. F-62
- The post-2030 roadway alignment shown in the East Planning Area map is inconsistent with and bisects the Prairie City OHV Park. F-63

Trails and Bikeways Plan (Figure 3.0-20):

- There is a gap in the Bradshaw Road Class II Bike Lane facility in the General Plan Planning Area (GPPA) from Kiefer Boulevard to the boundary of the GPPA. Bradshaw Road is a regional facility serving an important transportation corridor from Folsom Boulevard south to Grant Line Road in Elk Grove. The County of Sacramento and the City of Elk Grove both have designated Bradshaw Road as a Class II Bike Lanes in their Bicycle Master Plans (BMP). The County has two current projects to improve Bradshaw Road from Calvine Road to Florin Road, and from Florin Road to Morrison Creek. (These two projects include; road widening, signal installations and modifications, bridge replacement, landscaped medians, interceptor sewer, sidewalks, and bike lanes). F-64
- Coloma Road is designated as a "Special Treatment Facility", which is not further explained in the text of the Circulation section. Coloma Road was designated by the County BMP as a Class II on- F-65

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Letter F Continued

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street bike lane facility. Although within the GPPA of the City of Rancho Cordova, Coloma Road is an important Bikeway to the region, as it provides better northbound access to the bike trails north of Hwy 50 to the American River Parkway, and beyond. A Coloma Road bikeway also avoids the crossing of Hwy 50 altogether. F-65 cont.

- Sunrise Boulevard was designated by the County BMP as an on-street Class II bike lane facility. This designation is missing from Figure C-2. It appears that the City of Rancho Cordova is relying on the Folsom South Canal as an alternate bike route. The County recommends reconsidering bike lanes on Sunrise Boulevard as many bicyclists prefer on-street facilities for their utilitarian purposes of convenience to access of businesses and local routes and their linear configuration which is better for commuting. Off-street trails that run parallel to roadways pose a hazard to bicyclists if they are crossed by driveways. F-66

- A portion of Sunrise is designated as an "Urban Bike Path", which is not further explained in the text of the Circulation section. Please define. F-67

Transit System Map (Figure 3.0-21):

- Neither the General Plan nor Figure 3.0-21 describes the characteristics of "Enhanced Transit Corridor" or "Transit Corridor". How do these transit corridors correlate with the Regional Service, City Service, District Service, and Special Service as described in the text of the General Plan. F-68

Section 4.5.2, Existing Traffic Conditions:

- The impacts to the LOS for Old Placerville Road for existing and 2030 conditions are not identified in the DEIR. The County's most recent 24-hour traffic count information indicates:

  20,280 ADT (2005) Old Placerville Road east of Bradshaw
  18,000 ADT (2003) Old Placerville Road east of Happy Lane
  13,100 ADT (2003) Old Placerville Road east of Routier Road F-69

- The existing ADT for White Rock Road appears to be low when compared to recent Sacramento County traffic count information. For the segment of White Rock Road, Zinfandel Drive to Sunrise Blvd, your document states 17,900 ADT while the County's count of 25,460 ADT, west of Sunrise Blvd dated 2004. For the segment of White Rock Road, Sunrise Blvd to Grant Line Road, your document states 4,400 ADT while the County's count of 13,200 ADT, east of Sunrise Blvd dated 2005. The County also has 13,000 ADT (2005) on White Rock Road north of Grant Line Road. F-70

Section 4.5.3, Regulatory Framework

- <u>50 Corridor Mobility Partnership.</u>

  The Partnership consists of the Cities of Folsom, El Dorado, Rancho Cordova and the County of El Dorado and Sacramento along with the areas major property owners. The group is discussing a collaborative effort to plan and build out the transportation infrastructure of the area in the most F-71

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Letter F Continued

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efficient way available. The Partnership also recommends a modification to the alignment of the extension of International Drive, east of Rancho Cordova Parkway, with an extension of International Drive extended to the north with a connection to White Rock Road. A traffic analysis has shown that this refinement will help to distribute the otherwise heavy vehicle movements on White Rock Road. F-71 cont.

The Partnership also understands that the traffic modeling assumes that the access along the proposed expressways is highly restricted to allow for the least amount of friction in order to obtain high levels of capacity. The General Plan should include measures to insure that this level of access control is maintained through development and implementation of the General Plan. F-72

Finally, it is recommended that the City staff meet with representatives of the Partnership to gather the latest information and results achieved by the Partnership. F-73

Section 4.5.4, Impacts and Mitigation Measures

- The DEIR and traffic analysis should study the impacts of the General Plan under all three 2030 conditions on the following roadway segments within the planning areas and on the regional transportation corridors surrounding the planning areas:

  SR 16 – Bradshaw Road to Watt Avenue
  SR 16 – Watt Avenue to Power Inn Road
  Watt Avenue – Fair Oaks Blvd to US 50
  Watt Avenue – US 50 to Folsom Blvd
  Watt Avenue – Folsom Blvd to Kiefer Blvd
  Watt Avenue – SR 16 to Elder Creek Road
  Watt Avenue – Elder Creek Road to Florin Road
  Bradshaw Road – Kiefer Blvd to SR 16
  Bradshaw Road – SR 16 to Elder Creek Road
  Bradshaw Road – Elder Creek Road to Florin Road
  Old Placerville Road – Bradshaw Road to Mather Field Road
  Elder Creek Road – Watt Avenue to Bradshaw Road F-74
  Elder Creek Road – Bradshaw Road to Excelsior Road
  Florin Road – Watt Avenue to Bradshaw Road
  Florin Road – Bradshaw Road to Excelsior Road
  Florin Road – Excelsior Road to Eagles Nest Road
  Florin Road – Eagles Nest Road to Sunrise Blvd
  Excelsior Road – Zinfandel Road to SR 16
  Excelsior Road – SR 16 to Elder Creek Road
  Excelsior Road – Elder Creek Road to Florin Road
  Eagles Nest Road – Douglas Road to SR 16
  Eagles Nest Road – SR 16 to Florin Road
  Eagles Nest Road – Florin Road to Grant Line Road
  Sunrise Blvd – Gold Country Blvd to Fair Oaks Blvd
  White Rock Road – Grant Line Road to Prairie City Road
  White Rock Road – Prairie City Road to Scott Road
  Prairie City Road – White Rock Road to US 50

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Letter F Continued

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Scott Road – White Rock Road to US 50

Should the analysis indicate that impacts to the above roadway segments are a result of the General Plan, appropriate mitigation measures, funding, and implementation mechanism identified. F-74 cont.

- The DEIR documents significant impacts to roadways wholly or partially within the jurisdiction of Sacramento County that are considered unavoidable and no mitigation required because of the General Plan's desire to not have roadways larger than 6 lanes or due to right-of-way constraints. The County would argue that various types of mitigation is feasible and should be considered for the affected roadways below: F-75

- Sunrise Blvd, north of the American River to White Rock Road. The DEIR should analyze the potential benefits and improvements in level of service associated with grade separating the following intersections with Sunrise Blvd: F-76

  Fair Oaks Blvd
  Gold Country Blvd
  Gold Express Drive
  Coloma Road
  Zinfandel Drive
  Fly-over connections at US 50
  Folsom Blvd

- Additional crossing of the American River.

  Along the northern boundary of the City of Rancho Cordova, the American River acts as a barrier limiting the north-south mobility for the community. The proposed growth in Rancho Cordova will induce additional demands on the limited crossings of the American River, Watt Avenue, Sunrise Blvd, and Hazel Avenue. These crossings are already highly impacted corridors and the projected growth in Rancho Cordova will contribute to greater impacts to these crossings. Another transportation crossing of the American River between Watt Avenue and Sunrise Blvd. will have the greatest impact for reducing congestion and increasing mobility. F-77

  The DEIR should analyze the potential benefits and improvements in level of service associated with an additional crossing of the American River. The crossing could be either a bridge or a tunnel. Alternatives could include various combinations of the following modes: transit, automobiles, bicycles, pedestrians. The County would be interested in collaborating with the City in planning, financing, and construction of an appropriate river crossing.

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Letter F Robert Sherry, Sacramento County Planning and Community Development

Response F-1: This comment is directed at the Rancho Cordova General Plan Planning Areas and the City's planning efforts for land located outside of the city limits without consultation with Sacramento County rather than the Draft EIR. The conceptual land uses for the Planning Areas located outside of the City limits were developed by looking at County maps and planning documents including, but not limited to: the Sacramento County General Plan; GIS-based biological resource maps from the County's South Sacramento HCP team; the Mather CLUP; the Mather Field Specific Plan and Community Plan Amendment for Mather Field; the Mather Airport Draft Master Plan (February 2004); and the Sacramento County staff report from Paul Lake to the Board of Supervisors regarding "Initiation of Mather-Related General Plan Amendments and Approval to Proceed with Application for Federal Wetland Fill Permits at South Mather" dated February 22, 2006. The City also utilized data on existing preserves to determine areas that were not appropriate for future development. In determining where commercial uses should be located along the Jackson, Bradshaw, Sunrise, and Grant Line corridors, the City utilized the *Retail Demand Strategy* by Leland Consulting Group. The commenter states that the County is concerned that the General Plan purports the annexation of these planning areas, including the Jackson Planning Area. While the City has indicated a desire to annex the unincorporated lands within the General Plan Planning Area, there is no City mandate to annex these areas within the General Plan's planning horizon. The commenter is referred to General Plan Action LU.3.7.1 and Policy LU.3.9 regarding annexations. The Rancho Cordova General Plan conceptual land plans and buildout numbers for the General Plan reflect the SACOG's Blueprint Vision and buildout projections for the region. Additionally, Rancho Cordova is the first jurisdiction to take the SACOG Blueprint process to a local level using the Place3s software. We regret that the County feels excluded from the General Plan process. Rancho Cordova has had a very open public participation process, including more than 40 workshops and meetings. Email and hard copy invitations of General Plan workshops, GPAC meetings and City Council hearings have been sent regularly to County Staff. To date, no County staff has attended City workshops, meetings, or hearings to speak about the County's planning efforts or to comment on the City's General Plan. Additionally, there has been coordination between City and County departments on planning and circulation issues. City staff has been participating in the South Sacramento HCP meetings to ensure coordination between the City and County's conservation efforts and biological resource mapping. The City has also participated in SACOG forums and has been very open about sharing land use assumptions, Blueprint implementation, and transportation projections. Because this comment does not pertain to the EIR, no further response is necessary.

Response F-2: The commenter states that the EIR does not provide a detailed discussion on the provision of water, sewer and roadways to serve growth within the Planning Areas. The General Plan EIR is a program EIR and not a project EIR. As stated on page 2.0-2 of the Draft EIR:

The program-level analysis considers the broad environmental effects of the overall proposed General Plan. This EIR will be used to evaluate subsequent projects and activities under the proposed General Plan. Additional environmental review under CEQA will be required and would be generally based on the subsequent project's consistency with the General Plan and the analysis in this EIR, as required under CEQA. When individual projects or activities under the General Plan are proposed, the City would be required to examine the projects or activities to determine whether their effects were adequately analyzed in the program EIR (CEQA Guidelines Section 15168). If the projects or activities would have no effects beyond those analyzed in this EIR, no further CEQA compliance would be required. In addition, the program-level General Plan EIR analysis addresses the cumulative impacts of development of the proposed General Plan, and analyzes a reasonable range of alternative land use maps, at an equal level of detail. This EIR is intended to evaluate the environmental impacts of the project to the greatest extent possible. This EIR should be used as the primary environmental document to evaluate all subsequent planning and permitting actions associated with projects in the City. Subsequent actions that may be associated with the proposed General Plan are identified in Section 3.0 (Project Description) of this document.

Additionally, the 16 Planning Areas in the General Plan provide conceptual development patterns and not entitlements. As described on page 24 of the Land Use Element:

Detailed planning efforts (e.g., Specific Plans) will be required for implementation of the majority of Planning Areas after the General Plan is adopted. Subsequent planning efforts will establish land use and circulation patterns; explore infrastructure, phasing, and financing issues; and determine that use, development and design are consistent with the City's General Plan. General information and population and employment assumptions will serve as a guide for future land use designations and development within each of the Planning Areas.

Draft EIR Section 4.5 (Transportation and Circulation) provides an analysis of roadway infrastructure throughout the General Plan Planning Area and analyzes the Circulation Plan (see Figure C-1 in the General Plan's Circulation Element), which illustrates the City's primary roadway network system, including freeways/expressways, major roads, and connector roads. The General Plan does not provide the location of future local roads within Planning Areas. Draft EIR Section 4.12 (Public Services and Utilities) provides an analysis of water and sewer infrastructure required to serve buildout of the General Plan. It does not establish the location of local roadways or water and sewer infrastructure within each Planning Area. With regard to water infrastructure, the City worked closely with the Sacramento County Water Agency and the other water purveyors to identify water supply and infrastructure for General Plan buildout. Pages 4.12-26 through –28 of the Draft EIR provides a detailed summary of the Zone 40, Golden State Water Company, and the Cal-Am existing water

supply infrastructure and master plans. The impact analysis of water supply infrastructure is provided on Draft EIR pages 4.12-28 through –37. Sacramento County Water Agency, Golden State Water Company and Cal-Am will be responsible for identifying the appropriate location and size of water supply infrastructure, which will be analyzed in subsequent environmental documents at a project level. Draft EIR pages 4.12-39 through –45 contain a detailed summary of the existing sewer infrastructure and master plans of the wastewater service providers (e.g., SRCSD and CSD-1). The impact analysis of sewer infrastructure is provided on Draft EIR pages 4.12-45 through –55. SRCSD and CSD-1 will be responsible for identifying the appropriate location and size of sewer infrastructure, which will be analyzed in subsequent environmental documents at a project level. The specific comments on Planning Areas, as provided in Attachments A and B of the commenter's letter, are responded to individually below.

Response F-3: The commenter states that the natural preserve represented in the East Planning Area are not large enough to protect native species, vernal pools or Orcutt Grass. As noted above in response to comment F-2, the conceptual land plans are intended as conceptual and not literal. The natural preserve areas and other land use bubbles were intended to show possible locations for the identified land uses. Future specific planning efforts will be required for the East Planning Area that will refine the exact locations, boundaries and size of preserves and other land uses. The commenter is referred to Response to Comment C-2 and C-5 and Draft EIR pages 4.10-34 through –68 regarding direct and indirect impacts to wildlife species.

Response F-4: The commenter is referred to Response to Comment F-3 above.

Response F-5: The commenter's statements and input regarding the East Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Response to Comment F-3 and Draft EIR pages 4.10-34 through –68 regarding direct and indirect impacts to wildlife species.

Response F-6: The commenter's statements and input regarding the East Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Response to Comment F-3.

Response F-7: The commenter's statements and input regarding the East Planning Area and the Elk Grove-Rancho Cordova Connector project are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho

Cordova Planning Commission will include consideration of comments received on the General Plan. It should be noted that final alignment for the Elk Grove-Rancho Cordova Connector project has yet to be determined.

Response F-8: The commenter's statements and input regarding the East Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Draft EIR Section 7.1 (Growth-Inducing Impacts) regarding the Draft EIR analysis of growth inducement.

Response F-9: The commenter is referred to the Noise Element of the General Plan, which includes noise standards (Tables N-1 and N-2), and Policies N.1.1, N.1.2 and N.2.4 and their associated actions. Subsequent residential uses will be required to analyze and mitigate the environmental impacts of the project in a subsequent project environmental document. The analysis would be expected to evaluate noise exposure from existing sources such as the Prairie City OHV Park because residential uses are a sensitive receptor to noise.

Response F-10: The commenter's statements and input regarding the East Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response F-11: This comment is related to future water supply for the East Planning Area and the difficulty in obtaining water supply to serve development in this Planning Area within the General Plan planning horizon. The commenter is referred to General Plan Land Use Element page 48 where it states:

> *The East Planning Area will probably be developed outside the time horizon of this Plan. However, development may occur within the General Plan time horizon if necessary conditions are met (e.g., infrastructure is provided, annexation is approved).*

The commenter is also referred to Draft EIR Section 4.9 (Hydrology and Water Quality) regarding water supply impacts of the proposed General Plan.

Response F-12: The commenter is referred to Response to Comment F-11 above regarding the timing of the East Planning Area and Draft EIR pages 4.12-45 through –55 regarding wastewater service impacts.

Response F-13: This comment notes that the City of Rancho Cordova's roadway system within the East Planning Area is inconsistent with the County's General Plan, which does not include any circulation (or much development) within this area. This comment is noted and it is acknowledged that the

City of Rancho Cordova General Plan evaluation identifies development and transportation systems within the Planning Area that are inconsistent with the County's current General Plan. This is specifically noted on Draft EIR pages 4.5-34 and –41.

Response F-14: This comment notes that the roadway alignments shown within the East Planning Area are inconsistent with that shown on the Roadway System Map (Figure 3.0-19). The East Planning Area exhibit does not show International Drive extending into the East Planning Area, nor does it show a northerly connection to Prairie City Road. The roadway alignments on the Roadway System Map are more accurate as it relates to transportation infrastructure. The commenter's statements and input regarding the East Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response F-15: This comment discusses that the Post-2030 roadway alignment identified in the East Planning Area is inconsistent with and bisects the Prairie City OHV Park. This is correct, as the roadway was identified to provide better connectivity from the East Planning Area to Prairie City Road. Also, since the connectivity does bisect the OHV Park, it was identified as an improvement likely to be constructed after year 2030. The Draft EIR analysis identifies impacts of the land use plan with and without roadway facilities foreseeable after year 2030, and therefore circulation impacts are identified with and without this connection (see Draft EIR Section 4.5 – Transportation and Circulation). While the exact alignment of this roadway has not been determined, the Draft EIR did acknowledge that it would impact approximately 9 acres of the Prairie City OHV Park, which would be a minor loss of its total land area (be less than one percent of the entire 836-acre Park).

Response F-16: This comment questions the ability of a two-lane loop road (beginning at Chrysanthy Road and extending to White Rock Road/Grant Line Road) accommodating proposed development in the East Planning Area. However, there are other roadway facilities, other than the loop road, serving this area. These roadways consist of and extension of Douglas Road, International Drive, and White Rock Road. The entire roadway network has sufficient capacity to serve demand in this area.

Response F-17: The comment identifies a concern that densities within the East Planning Area may not be sufficient to support the identified "Potential Transit Corridors." This comment is noted. It should be noted that the City is currently conducting a Transit Master Plan to further identify where there will be sufficient demand for transit facilities in the area.

Response F-18: Comment noted. This comment will be forwarded to the City Council for consideration as an additional trail on the City Trails and Bikeway Plan.

Response F-19: The comment refers that Grant Line Road and White Rock Road will have substantial volumes and that grade separation of the intersection should be considered. These comments are associated with the General Plan. The General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The City is currently conducting studies of intersections along major corridors in the Planning Area to identify appropriate right-of-way requirements concurrent with adjacent development. The City will review specific intersection right-of-way requirements at this location and consider a grade separation, if needed. It should be noted that the fourth leg of this intersection is a two-lane roadway that will require minimal green time, increasing capacity of the other approaches to the intersection.

Response F-20: The six-lane expressway designation recognizes the Rancho Cordova-Elk Grove-El Dorado Connector and provides sufficient capacity to serve as a regional transportation facility.

Response F-21: The commenter's statements and input regarding the Grant Line South Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Response to Comment C-2 and C-5 and Draft EIR pages 4.10-34 through –68 regarding direct and indirect impacts to biological resources.

Response F-22: The commenter's statements and input regarding the Grant Line South Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Response to Comment C-2 and C-5 and Draft EIR pages 4.10-34 through –68 regarding direct and indirect impacts to biological resources.

Response F-23: The commenter's statements and input regarding the Grant Line South Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Response to Comment C-2 and C-5. Draft EIR Impact 4.10.1 and 4.10.2 address both direct and indirect biological resource impacts from the General Plan proposed land use plans.

Response F-24: The commenter's statements and input regarding the Grant Line South Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for

the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Response to Comment C-2 and C-5. The City has been participating in the Upper Laguna Creek Collaborative meetings and planning efforts. While the General Plan does not establish a minimum buffer width, the Natural Resources Element contains actions that direct the City to establish performance standards for natural resource preserves, including a provision to allow sufficient width adjacent to natural resource preserves to allow for trails and greenbelts (Action NR.3.4.1) and standards to allow public access along creek corridors (Action NR.3.4.2). As noted in Draft EIR page 4.9-12, groundwater recharge in this area primarily occurs from stream recharge from the Cosumnes River and the soil characteristics within the Planning Area have low groundwater recharge capabilities.

Response F-25: Comment noted. The commenter is referred to Response to Comment F-23.

Response F-26. The commenter's statements and input regarding the Grant Line South Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Draft EIR pages 4.1-46 through –56 regarding inconsistencies with the Sacramento County General Plan.

Response F-27: Comment noted. There are several General Plan policies LU.6.2 and UD.2.3 and actions LU.6.2.1, LU.6.2.2., UD.2.3.1, UD2.3.2, and UD.2.3.3 relate to a sense of transition of density and intensity and character of Planning Areas. The commenter is also referred to Draft EIR Section 7.1 (Growth-Inducing Impacts) regarding the Draft EIR analysis of growth inducement.

Response F-28: The commenter is referred to Response to Comment F-7.

Response F-29: The commenter is referred to Responses to Comment F-22 and F-24.

Response F-30: Draft EIR Impact 4.12.5.1 specifically addresses this issue and includes Mitigation Measure MM 4.12.5.1 to address this issue.

Response F-31: The commenter's statements and input regarding the Grant Line North Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Draft EIR pages 4.1-46 through –56 regarding inconsistencies with the Sacramento County General Plan.

Response F-32: The commenter is referred to Response to Comment F-22 and F-24.

Response F-33: As noted above in Response to Comment F-2, the conceptual land plans are intended as conceptual and not literal. The village center and natural preserve bubbles were intended to show possible locations for the identified land uses. Future specific planning efforts will be required for the Grant Line North Planning Area that will refine the exact locations, boundaries and size of preserves and other land uses. The commenter is also referred to Response to Comment C-2 and C-5 and Draft EIR pages 4.10-34 through –68 regarding direct and indirect impacts to biological resources.

Response F-34: Comment noted. The commenter is referred to Response to Comment F-33.

Response F-35: As noted above in Response to Comment F-2, the conceptual land plans are intended as conceptual and not literal. The natural preserve and other land use bubbles were intended to show possible locations for the identified land uses. Future specific planning efforts will be required for the Grant Line West Planning Area that will refine the exact locations, boundaries and size of preserves and other land uses. The commenter is also referred to Response to Comment C-2 and C-5 and Draft EIR pages 4.10-34 through –68 regarding direct and indirect impacts to biological resources.

Response F-36: The commenter's statements and input regarding the Grant Line West Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Response to Comment C-2 and C-5 and the impact analysis provided in Draft EIR Section 4.10 (Biological Resources).

Response F-37: The commenter's statements and input regarding the Grant Line West Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. General Plan Land Use Policy LU.1.4 and Action 1.4.4 require the buffering of incompatible land uses and protecting neighborhoods from encroachment of incompatible land uses.

Response F-38: The commenter's statements and input regarding the Grant Line West Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response F-39: The commenter's statements and input regarding the Grant Line West Planning Area are noted. These comments are associated with the

General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response F-40: Comment noted. The commenter is referred to Response to Comment F-2 regarding the conceptual nature of the land use designations in the Mather Planning Area. Additionally, City staff utilized Sacramento County planning documents and maps, including the Sacramento County staff report from Paul Lake to the Board of Supervisors regarding "Initiation of Mather-Related General Plan Amendments and Approval to Proceed with Application for Federal Wetland Fill Permits at South Mather" dated February 22, 2006 to prepare the Mather Planning Area conceptual land plan. Staff recommends modifications to the text of the Planning Area discussion that identifies most of the "HI" designations as being related to airport operations. Also, staff will consider adding the following text to the end of the second paragraph, "Heavy industrial uses west of Mather Boulevard reflect the footprint of airport operations and required buffer areas; uses north of Douglas Road may or may not be associated with airport operations." The environmental effects of the proposed Mather Planning Area (e.g., biological resource impacts and proposed roadway system) were addressed in the Draft EIR (Draft EIR Sections 4.5 – Transportation and Circulation and 4.10 – Biological Resources).

Response F-41: This comment requests a definition of "six lanes with special treatment," as identified on the Circulation Map. This identification is for locations where demand is expected to exceed capacity. However, since the City desires cross-sections of fewer than six lanes, special treatments are required to improve capacity on these facilities. The special treatments refer to intersection treatments to improve capacity, continuous right-turn lanes, limited access to the roadways, frontage roads, and managing access to adjacent parcels. All of these will increase capacity of the roadway. To be conservative in the environmental evaluation, these roadways were assumed to have the same capacity of a six-lane Major Road.

Response F-42: The roadway alignments shown in Draft EIR Figure 3.0-19 (Roadway System Map) reflect the proposed circulation system, while the individual Planning Area roadway systems are intended to show conceptual alignments and how the Planning Areas would connect with the proposed General Plan Roadway System.

Response F-43: The commenter is referred to Response to Comment F-19.

Response F-44: This comment notes that the County has designated Jackson Highway (SR-16) as a four-lane arterial east of Grant Line Road. This is inconsistent with the City's designation of a six-lane expressway. However, as development occurs in this corridor, the increased capacity will be needed. The inconsistency is noted. The Draft EIR traffic analysis is based on the proposed General Plan Roadway System.

Response F-45: This comment discusses the County's General Plan designation for Sunrise Boulevard north of Grant Line Road as a six-lane thoroughfare. This is consistent with the City's designation.

Response F-46: It is noted that the County will likely be upgrading the designation of this facility in its next General Plan update.

Response F-47: It is noted that the County will likely be upgrading the designation of this facility in its next General Plan update.

Response F-48: The Draft EIR notes this inconsistency on Draft EIR page 4.5-41.

Response F-49: This comment discusses that the County has approved some alternative roadway alignments for the extensions of Douglas Road, Excelsior Road, and Eagles Nest Road to minimize impacts to biological resources. This comment is noted and supported by the City of Rancho Cordova. The comment also discusses that the extensions of Chrysanthy Boulevard and Routier Road are likely infeasible due to impacts to biological resources. Draft EIR Table 4.5-13 provides a summary of anticipated environmental effects of the proposed General Plan Roadway System (including the extension of Chrysanthy Boulevard and Routier Road). Draft EIR page 4.5-41 notes that the proposed General Plan connectivity into the Mather Field area is inconsistent with the current Sacramento County General Plan Transportation Plan.

Response F-50: This comment discusses the extension of Mather Field Road through Mather Field. The commenter is correct that this extension would be facilitated using a tunnel. Given the uncertainty of this happening, the improvement was identified as a post-2030 improvement and impacts were identified with and without the improvement in Section 4.5 (Transportation and Circulation) of the Draft EIR.

Response F-51: This comment discusses that the County's General Plan designates Florin Road as a six lane thoroughfare. The City's General Plan shows this as a four lane facility. The comment is noted.

Response F-52: This comment discusses that the County's General Plan designates Excelsior Road and Eagles Nest Road as four lane facilities. This is consistent with the City's General Plan, which designates Excelsior Road as a four lane facility north of Elder Creek Road and Eagles Nest Road as a four lane facility north of Florin Road. This comment is noted.

Response F-53: This comment discusses inconsistencies between the City and County General Plans, for the Chrysanthy Boulevard Extension to Florin Road and the Routier Road extension to Elder Creek Road. These roadways provide a grid system in this planning area, consistent with goals identified in the City's General Plan.

Response F-54: This comment discusses that the County's General Plan designates Bradshaw Road as a six lane thoroughfare. This is consistent with the City's General Plan, which designates the roadway as a six lane major road or an expressway.

Response F-55: This comment discusses that the County's General Plan designates Mayhew Road as a four lane arterial. However, it is the City's understanding that there was a County general plan amendment that downgraded Mayhew Road to a two lane collector road, which is consistent with the City's General Plan designation.

Response F-56: This comment discusses that the County's General Plan designates South Watt Avenue as a six lane limited access thoroughfare. This is consistent with the City's General Plan, which designates the facility as a six lane major road with special treatments (such as limited access control).

Response F-57: This comment discusses that the County's General Plan designates Old Placerville Road as a four lane arterial. The City's General Plan designates it as a six lane expressway, ultimately connecting to International Drive. This facility provides one of the major east-west connections through the City. The inconsistency between General Plans is noted. However, given the importance of providing parallel capacity to U.S. 50, the County may want to consider upgrading Old Placerville Road to a six lane expressway with its next general plan update.

Response F-58: This comment acknowledges that, although the County's General Plan designates Folsom Boulevard as a six lane thoroughfare, physical constraints exist that may make implementation beyond four lanes infeasible. The County will consider reclassifying this facility with its next general plan update. If reclassified, it would be consistent with the City's General Plan.

Response F-59: This comment acknowledges that, although the County's General Plan designates Gold Country Boulevard and Coloma Road as four lane arterials east of Sunrise Boulevard, the County will reconsider reclassifying them as two lane facilities in their General Plan update. This comment is noted.

Response F-60: This comment identifies that the County's General Plan designates Sunrise Boulevard and Hazel Avenue as six lane thoroughfares. This is consistent with the City's General Plan, which designates these facilities as six lane major roads. The comment is noted.

Response F-61: This comment discusses the County's collaboration with Gencorp and processing of the Easton Development. The proposed land use in the Easton area is consistent with assumptions incorporated into City's traffic impact analysis. Additionally, the major roadway infrastructure is consistent with that currently identified in the Easton area (Glenborough Planning Area).

Response F-62: This comment acknowledges that, although the County's General Plan designates Prairie City Road as a two lane rural roadway, the County will reconsider reclassifying it as a four lane arterial facility in their General Plan update. This comment is noted.

Response F-63: The commenter is referred to Response to Comment F-15.

Response F-64: The commenter's statements and input regarding the proposed General Plan Trails and Bikeways Plan are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response F-65: The commenter's statements and input regarding the proposed General Plan Trails and Bikeways Plan are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response F-66: The commenter's statements and input regarding the proposed General Plan Trails and Bikeways Plan are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response F-67: The commenter's statements and input regarding the proposed General Plan Trails and Bikeways Plan are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response F-68: This comments asks for definitions of "Enhanced Transit Corridors" and "Transit Corridor," as described on Figure 3.0-21. These descriptions are provided below:

- Transit Corridor – Roadway where the City envisions potential bus or shuttle service being accommodated. These facilities will ultimately have bus turnouts at potential stop locations, potential sheltered bus stops, and will be designed to accommodate turning radii of busses.

- Enhanced Transit Corridor – Roadway where the City envisions an enhanced transit corridor. These enhanced transit corridors may consist of dedicated bus rapid transit (BRT) lanes, carpool lanes, light rail transit facilities, and/or signal preemption for busses. The feasibility of service along these corridors are being evaluated as part of the City's Transit Master Plan process.

Response F-69: This comment notes that LOS for Old Placerville Road is not identified for Existing and 2030 conditions. The forecasts for Old Placerville Road are presented below:

	East of Bradshaw			East of Happy Lane			East of Routier		
	Volume	V/C	LOS	Volume	V/C	LOS	Volume	V/C	LOS

	East of Bradshaw			East of Happy Lane			East of Routier		
	Volume	V/C	LOS	Volume	V/C	LOS	Volume	V/C	LOS
Existing (2-Lanes)	20,280	1.13	F	18,000	1.00	E	13,100	0.73	C
2030	61,990	0.77	D	57,230	0.71	D	52,840	0.65	C
Buildout, 2030 Roadway Network	65,990	0.81	D	61,950	0.76	D	57,090	0.70	D
Buildout, Post-2030 Roadway Network	60,150	0.74	D	56,470	0.70	C	59,700	0.74	D

As shown above, there is an existing deficiency on Old Placerville Road. However, the City's General Plan will result in a less-than-significant impact to this facility with the expansion of the roadway.

Response F-70: This comment corresponds to a discrepancy in count data collected by the County, and the data used in the traffic analysis for the General Plan, relating to White Rock Road. Counts used in this study were collected by Fehr & Peers in 2003 and 2004, in conjunction with the Sunrise/Douglas II transportation impact study (prepared by Fehr & Peers for the County of Sacramento) and the Rio del Oro EIR transportation study (under preparation by Fehr & Peers for the City of Rancho Cordova). These counts were used to calibrate the model in 2004, using land use and roadway network connectivity at that time. In fact, as we began initial scoping for the Suncreek EIR (Fall 2005), the traffic volume was counted again on White Rock Road between Sunrise Boulevard and Grant Line Road and was found to be 4,600, virtually identical to that previously counted and used in the General Plan study. (This minor difference between 4,400 and 4,600 does not change the significance finding for any impact identified in the Draft EIR.)

Response F-71: This comment discusses the 50 Corridor Mobility Partnership, consisting of the Cities of Folsom, El Dorado, and Rancho Cordova; and the Counties of Sacramento and El Dorado. The partnership has recently identified a potential realignment of International Drive within Rio del Oro northward to White Rock Road. Fehr & Peers has reviewed this alignment by incorporating it into our travel demand forecasting. The results indicate that no new significant traffic impacts would be incurred with the proposed realignment, if implemented.

Response F-72: These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response F-73: This comment discusses the 50 Corridor Mobility Partnership and recommends that the City work with the partnership "to gather the latest information and results achieved by the partnership." The City is an

active participant in the partnership and will work to accommodate mobility in the region, where appropriate.

Response F-74: City staff consulted with County staff early in the General Plan process to determine an appropriate list of roadway segments to be analyzed in the CEQA review process, based in part on transportation improvements proposed, planned, or reasonably foreseeable, in connection with specific projects.

As a result of evaluating the specific traffic segments, and other transportation and circulation impacts of the proposed General Plan, the Draft EIR acknowledged that implementation of the proposed General Plan would result in a cumulatively considerable contribution to traffic impacts on area roadways, which would include regional roadways projected to fail under cumulative conditions (e.g., Watt Avenue, Sunrise Boulevard and Hazel Avenue) (Draft EIR page 4.5-54). The following text change is made to the Draft EIR to clarify this:

- Draft EIR page 4.5-54, the following text change is made to the paragraph under Impact 4.5.6:

  "The traffic impact analyses provided in **Impact 4.5.1** and **4.5.2** are based on cumulative conditions (year 2030) that take into account anticipated traffic volumes from development in the region. While the proposed General Plan land uses would provide reduced vehicle miles traveled (in terms of the length of trips) outside of the Planning Area (see **Table 4.5-5**) as compared to maintenance of existing land use patterns (assuming development of the land use pattern under the Sacramento County General Plan), the proposed General Plan would still add substantial traffic volumes on local roadways and state highway facilities that would result in significant traffic impacts within the Planning Area as well as in adjoining jurisdictions <u>(e.g., Sacramento County) on regional roadway facilities</u>. Improvements to regional transportation facilities associated with cumulative traffic conditions are intended to be addressed through implementation of SACOG MTP."

We believe that the level of analysis provided in the Draft EIR is consistent with CEQA (e.g., Guidelines Sections 15146 and 15151), including as it relates to impacts on the roadway segments listed by commenter, some of which are located within the Planning Area outside of the City's boundaries, and some of which are outside of the Planning Area altogether. The transportation and circulation analysis is specific and comprehensive enough to sufficiently address the General Plan's potential impacts to area traffic. Further, the analysis is specific enough to permit informed decision making and public participation, in that it provides sufficient information to understand the potential transportation and circulation impacts, and permit a reasonable choice of alternatives and consideration of mitigation measures. An evaluation of the impact of the proposed General Plan on regional traffic need not be exhaustive. Accordingly, we do not agree with commenter that the Draft EIR needs to consider impacts on the roadway segments listed by commenter.

Response F-75: This comment discusses the fact that some roadway segment impacts within the County of Sacramento are identified as significant and unavoidable as roadways would need to be widened to cross sections greater than six lanes, and the County disagrees with the significant and unavoidable determination as they feel that various types of mitigation may be feasible and should be considered. However, since any mitigation measures to these types of facilities would occur outside the City limits, the City of Rancho Cordova could not guarantee implementation of the mitigation measure. Therefore, as identified in the EIR, the impact would remain significant and unavoidable. In addition, the widening of roadways beyond six lanes would conflict with City Council direction that no local roadway would be designed larger than a 6-lane facility, given that large roadway facilities (8 lanes and greater) conflicts with pedestrian and bicycle use and results in the "barrier effect" of such roadways dividing portions of the City (Drat EIR pages 4.5-43 and – 44).

Response F-76: This comment recommends that the potential benefits and improvements in levels of service associated with grade separating intersections on Sunrise Boulevard from Fair Oaks Boulevard to Folsom Boulevard be discussed. This section of Sunrise Boulevard was identified in the EIR as operating at an unacceptable level. Grade separation of intersections in this area could improve operations and may reduce the impacts identified in the Draft EIR (though not eliminate the impact). With grade separations in place, there is still limited capacity on the roadway and on the existing structure over the American River. Please note that some of these grade separations are already being considered within the City (Draft EIR Figure 3.0-19). Additionally, through the City's transportation infrastructure phasing study, it has been recommended that the City conduct a comprehensive study of Sunrise Boulevard, from SR 16 to Fair Oaks Boulevard, to identify improvements through the corridor that provide the most traffic relief.

Response F-77: This comment recommends that the Rancho Cordova General Plan Draft EIR analyze the potential benefits and level of service improvements associated with adding another river crossing between Watt Avenue and Sunrise Boulevard. This type of project would improve regional connectivity and mobility. As such, it should be evaluated in the regional context and is beyond the confines of the City's General Plan. The City is willing to coordinate with SACOG, Sacramento County, and other interested jurisdictions to work on identifying appropriateness of an additional river crossing, location and type of crossing, environmental impacts of the crossing, and potential funding issues. However, it should be noted that the provision of an additional crossing of the American River would be outside of the jurisdiction of the City.

Municipal Services Agency

Department of Waste Management & Recycling
David A. Pelser, Director

Terry Schutten, County Executive
Cheryl Creson, Agency Administrator

County of Sacramento

Letter G

May 11, 2006

Patrick Angell
City of Rancho Cordova Planning Department
2729 Prospect Park Drive
Rancho Cordova, CA 95670

Subject: City of Rancho Cordova Draft General Plan (Recorded March 13, 2006), Public Comment Period

Dear Mr. Angell,

The Sacramento County Department of Waste Management and Recycling (Department) has reviewed the Land Use Element and the Circulation Element of the City's March 13, 2006 draft General Plan and provides comments below.

Background: County-Owned Land Near Kiefer Landfill

Sacramento County has owned the Kiefer Landfill at 12701 Kiefer Boulevard in Sloughhouse since 1966. Starting in 1996 the County acquired parcels near the Landfill with the intention to restrict ultimate development near the Landfill towards uses which are exclusively "landfill-compatible". The County objective in 1996 was to acquire parcels within a 2,000-foot distance completely surrounding the Landfill. The County refers to the 2,000 foot distance surrounding the permitted boundary* of the Landfill as "the 1997 Buffer Limit", and land within "the 1997 Buffer Limit" is known as "the 1997 Buffer".

With respect to the center of the Landfill, if one considers the easterly direction, the County was unable to acquire any parcels to contribute to County ownership of the Buffer, nevertheless the 1997 Buffer Limit does exist there through non County-owned parcels. G-1

With respect to the center of the Landfill, if one considers the northerly-westerly and the southerly directions, the County acquired parcels which, in many cases, extend several thousand feet beyond the 1997 2,000-foot Buffer Limit. The County refers to all acquired parcels near the Landfill as "the Kiefer Landfill (KLF) Bufferlands", though strictly speaking, only land within the 2,000-foot buffer limit is within the "1997 Buffer".

The Department is currently preparing a master plan for the KLF Bufferlands. Based on the results of this effort the County may create a new buffer limit to supersede the 1997 Buffer Limit. Thus the County may acquire additional parcels in some areas and sell parcels in other areas to obtain a buffer limit which better suits the needs of the County.

Letter G Continued

Mr. Patrick Angell

May 15, 2006

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Comments by Sacramento County, Department of Waste Management (Department): Grouped According to Rancho Cordova Planning Areas

The City of Rancho Cordova has defined three "planning areas" near Kiefer Landfill.

The "Grantline North Planning Area" is near the north and west sides of Kiefer Landfill.
The "Grantline South Planning Area" is near the south side of Kiefer Landfill.
The "East Planning Area" is near the east side of Kiefer Landfill.

Grantline North Planning Area

The Grantline Road North Planning Area (GRN-PA) abuts the Kiefer Landfill permitted boundary*, and the separating feature is Grantline Road. Within the GRN-PA the County owns three parcels (APN's 067-0100-003, -009, -010) totaling approximately 490 acres and extending 4380-feet beyond the permitted boundary*. The draft General Plan designates two land use categories within these three parcels, NR (Natural Resources) and R-MD (Residential-Medium Density). G-2

Refer to Figure LU-14, "Conceptual Land Plan for the Grantline Road North Planning Area" (GRN-PA): The Department is preparing a phased master plan of the Kiefer Landfill Bufferlands. This effort includes mapping of natural resources to better determine those areas of land which are best served by a land use designation of NR. The County may seek to adjust the NR boundaries identified in the City's draft General Plan GRN-PA at a later date when better scientific information is available. The County concurs with the R-MD designation elsewhere on County-owned lands within the GRN-PA. Otherwise we have no further comments on designated land uses within the Grantline Road North Planning Area at this time.

The Department notes that the draft General Plan designates Grantline Road as a 6-lane expressway.

The Department notes that the draft General Plan designates the Grantline Road corridor as the location for a Class II bike lane and also for an off street trail.

Refer to Figure C-1, "Circulation Plan With Roadways and Sizing": The County alerts the City of Rancho Cordova that the land on the eastern edge of Grantline Road is currently burdened with a perpetual conservation easement to protect vernal pools existing adjacent to the Road. Future expansion of Grantline Road to the 6-lane expressway configuration must occur exclusively on the western edge for a length of 6,700-feet, north of Kiefer Boulevard. G-3

* "permitted boundary" refers to the defined extents of the Landfill as permitted under the State of California Regulations, CCR Title 27

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Letter G Continued

Mr. Patrick Angell

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Grantline South Planning Area

The Grantline Road South Planning Area (GRS-PA) abuts the 1997 Buffer Limit. Within the GRS-PA the County owns five parcels (APN's 126-0080-002, -016, -022, -032, -031) totaling roughly a thousand acres and extending over 6,000-feet beyond the permitted boundary*. The draft General Plan designates three land use categories within these five parcels, NR (Natural Resources), R-MD (Residential-Medium Density), and R-E (Residential-Estate/Rural).

Refer to Figure LU-16, "Conceptual Land Plan for the Grantline Road North Planning Area"[sic.]: The County notes that the Figure is mis-titled. G-4

Refer to Figure LU-16, Grantline Road South Planning Area (GRS-PA): The County may seek to revise the land use designations or extents of those designations when the results of the master planning effort are available. The County has no further comments on designated land uses within the Grantline Road South Planning Area at this time.

The Department notes that the draft General Plan makes provides no indication of plans for future bikeways or trails within the Grantline South Planning Area. G-5

Refer to Figure C-2, "Bikeway and Trails Plan". The County anticipates that the County's on-going master planning effort for the Kiefer Landfill Bufferlands will conclude that a bikeway and trail along the Deer Creek corridor will provide a valuable enhancement to the area. The County invites the City of Rancho Cordova to meet and explore how such a County Deer Creek bikeway and trail feature might better connect to a bikeway and trail system within the City. G-6

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Letter G Continued

Mr. Patrick Angell

May 15, 2006

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East Planning Area

The East Planning Area (E-PA) abuts the 1997 Buffer Limit. The County owns no property within the E-PA. However the County has acquired an easement on APN 073-0070-011 to burden the property with landfill related nuisances. A very small portion of this property (roughly 6 acres) does lie within the E-PA and the draft General Plan imprecisely designates this portion as R-E (Residential-Estate/Rural) or NR (Natural Resources).

Reference Figure LU-10, "Conceptual Land Plan for the East Planning Area" (E-PA): The easement mentioned affects the feasibility of developing this portion of the E-PA as R-E (Residential-Estate/Rural), if it is the City's intention to maintain such a designation. If it is the City has designated this portion as NR (Natural Resources), then the County has no comment. G-7

If you have any questions, please contact me or Pat Quinn on my staff.

Very truly yours,

David A. Pelser
Director

Copies: Cheryl Creson, Tom Zlotkowski, Robert Sherry

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Letter G David Pelser, Sacramento County Department of Waste Management and Recycling

Response G-1: Comment noted. The Draft EIR acknowledges the 2,000-foot buffer standard and includes mitigation that maintains this buffer standard (Draft EIR pages 4.12-61 through –63).

Response G-2: The commenter's statements and input regarding the Grant Line North Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response G-3: Comment noted. The Draft EIR programmatically evaluated the environmental effects of proposed roadway, bicycle and pedestrian improvements under the General Plan including the widening of Grant Line Road.

Response G-4: The commenter's statements and input regarding the Grant Line South Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response G-5: The commenter is referred to Response to Comment G-4.

Response G-6: The commenter's statements and input regarding the General Plan Bikeway and Trails Plan are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response G-7: The commenter's statements and input regarding the East Planning Area are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Letter H

CITY OF FOLSOM
Utilities Department
50 Natoma Street
Folsom, California 95630

Kenneth V. Payne, P.E.
Director

Walter E. Sadler, P.E.
Assistant Director

May 12, 2006

Patrick Angell
City of Rancho Cordova Planning Department
2729 Prospect Park Drive
Rancho Cordova, CA 95670

SUBJECT: **City of Rancho Cordova General Plan Update-*Water Supply Evaluation***

Dear Mr. Angell:

The City of Rancho Cordova's *Water Supply Evaluation (Evaluation)*, prepared as part of the Draft Environmental Impact Report (EIR) required for approval of its General Plan, raises a number of concerns from a regional water management perspective. The City of Folsom requests that the City of Rancho Cordova reconcile these issues prior to adoption of its EIR. The concerns are specifically related to the City of Rancho Cordova's assumptions regarding water supplies and demands for the Aerojet, Westborough, and Glenborough "Planning Areas" as identified in the General Plan. If the assumptions are not clarified, and modified accordingly, the determination of whether sufficient, reliable supplies exist to serve projected demands in these planning areas could be flawed. H-1

The City of Folsom has identified two general concerns based upon the *Evaluation* that it respectfully requests the City of Rancho Cordova address prior to adoption of the EIR. The first concern relates to the City of Folsom's interest in avoiding potential conflicts that may result if the EIR and *Evaluation* do not reflect existing agreements for water service in the Aerojet, Westborough, and Glenborough areas. The second concern is the lack of clarity regarding the reliability of supplies identified in the EIR and *Evaluation* that the City of Rancho Cordova assumes will be available to serve these areas. Without clarity, the City of Folsom's water supplies, especially those tied to the 2036 contract with Aerojet, may be implicated.

City of Folsom Water Service Area

The geographic areas identified in the City of Rancho Cordova's General Plan and EIR, and subsequently referenced in the *Evaluation,* defined as the Westborough, Glenborough and Aerojet Planning Areas, are within the City of Folsom Water Service Area (Attachment No. 1), and therefore any indication that another water purveyor, besides the City of Folsom, will serve water to these areas needs to be corrected to reflect existing agreements. The City of Folsom acquired Southern California Water Company's H-2

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Letter H Continued

"Folsom Division," including a water right of 22,000 acre-feet/year in a 1966 Agreement (Attachment No. 2) that was formally approved with conditions by the California Public Utilities Commission. The Agreement specifies that the City of Folsom will serve all existing customers at the time of sale and all others within the Folsom Division on reasonable terms,[1] and also provides that Southern California Water Company, now Golden State Water Company (GSWC), agreed that it would "not sell or deliver water for resale or use within the boundaries of the Folsom Division as it existed on December 11, 1963." The Agreement also requires the City of Folsom to both continue serving territories that exist outside the City boundaries and to permit additional connections from applicants within the "Folsom Division." H-2 cont.

The fact that the Westborough, Glenborough and Aerojet Planning Areas are within the City of Folsom Water Service Area is supported by a recent Sacramento County Planning and Community Development Department request that the City of Folsom perform a water supply assessment for Glenborough[2]. The *Evaluation* should properly reflect this request for performance of a water supply assessment and suggest that the City of Rancho Cordova is prepared to develop its future land-use plans in recognition of the conclusions reached in water supply assessment.

The City of Folsom is primarily concerned with the fact that the City of Rancho Cordova is identifying and making preliminary land-use plans for the Westborough, Glenborough and Aerojet Planning Areas in anticipation of annexation, and to the extent that these plans are inconsistent with the City of Folsom's water supply evaluations, there is the potential for future conflicts between water suppliers and land-use entities. Such a conflict has already manifest itself in the form of GSWC submitting Advice Letter 1210-W to the California Public Utilities Commission (PUC) as the first step in an attempt to expand its place of use to include a portion of the Westborough Planning Area. The City of Folsom has since filed a protest on April 27, 2006, in response to submission of GSWC's advice letter (Attachment No 3). H-3

Evaluation of Water Supply Reliability

The EIR and *Evaluation* do not fully address the reliability of identified supplies for Westborough, Glenborough and Aerojet Planning Areas. Specifically, the *Evaluation* identifies both the GSWC and Sacramento County Water Agency (SCWA) as potential water suppliers for Westborough, though Westborough is within the City of Folsom Service Area. Assuming GSWC or SCWA were to serve these areas, the *Evaluation* does not identify which replacement water supplies might be used to support new development in Westborough, and therefore the potential supply reliability is uncertain. Also, the Glenborough area is identified in the *Evaluation* at Table 12, Footnote 5 on Page 43 as a Proposed Project that would be provided GSWC replacement water supplies, but the *Evaluation* does not address potential demand or supply quantities for the Glenborough area. While the Aerojet Planning Area is identified in the General Plan, it is not H-4

[1] "Folsom Division" is defined in Section 1.05 of the 1966 Agreement as the "area so designated and described in the First Amended Petition in Application No. 46026 before the Commission."
[2] In the request from Sacramento County to the City of Folsom, Glenborough is referred to as Easton

2

Letter H Continued

discussed in the *Evaluation*. Finally, the *Evaluation* does not recognize the raw water supply provided by the City of Folsom to Aerojet under a 1986 Agreement that will expire in 2036. No other water supply has been identified to replace this supply once it expires – at which time Folsom is planning to designate other uses for this water in order to meet projected demands. H-4 cont.

The *Evaluation* indicates that "Westborough would likely receive water supplies through Zone 40 using the replacement water provided to GSWC via the Folsom South Canal. (Pg. 30)[3] The *Evaluation* also indicates that: "Once water supply obligations are met (maximum of 20,200 acre-feet per year for GSWC and Cal-Am), SCWA would use excess replacement water supplies (approximately 15,000 acre-feet/year) to serve new growth and development on Aerojet lands (Rio del Oro, Westborough, etc.)" The EIR and *Evaluation* also indicate that "Beyond buildout of its corporate limits, new development projects would be served by SCWA (no other purveyors are located outside the City's corporate limits)…"[4] This simply misstates the facts as presented in this memo, and also is misleading because, as the *Evaluation* assumes, Folsom is listed as a regional purveyor that might consider transferring water to meet the demands in the identified Planning Areas.

Not only are these two statements problematic on their own due to the fact that the Westborough Planning Area is currently in the City of Folsom's Water Service Area, but also, taken together, it is not clear which "replacement water" the City of Rancho Cordova is assuming might serve Westborough. According to the *Evaluation*, the SCWA has existing agreements to provide GSWC with up to 15,200 acre-feet of replacement (ground) water following remediation of the water at the Aerojet Groundwater Treatment and Extraction facility. GSWC is planning to receive 5,000 acre-feet/year from the Folsom South Canal, and approximately 6,300 acre-feet/year through SCWA facilities following diversion at Freeport. Not only are the availability of these supplies uncertain given the inherently technical nature of identifying, pumping and conveying remediated groundwater, but the lack of any detailed description of GSWC's legal right to remediated and treated water should be of particular concern to the City of Rancho Cordova. H-5

Dry-Year Response Strategy

The *Evaluation* states that SCWA and GSWC are ensuring that even in dry years, water supplies are available and reliable. The *Evaluation* also states that additional water supplies would need to be secured in cooperation with local water purveyors to meet these future demands. These statements appear to be a contradiction. The *Evaluation* needs to clearly state how dry-year demands will be met given existing agreements by water purveyors to conserve during dry years. Without such information, there is reason to believe that the City of Folsom's water supplies under contract to Aerojet as well as obligations to serve potential customers that were part of the 1966 Agreement are potentially implicated as a source of dry-year supplies. H-6

[3] This assumption is also made in the *Evaluation* on Table 12, Footnote 5 on Page 43.
[4] *Evaluation,* Section 5.4.1, Pg. 46; EIR, Section 4.9, Pg. 45

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Letter H Continued

Since the Westborough, Glenborough and Aerojet Planning Areas are within the City of Folsom water service area, and the City of Folsom is a signatory to the Water Forum, the *Evaluation* needs to clearly state that dry-year water obligations and water conservation commitments will be considered in water supply planning. While Section 4.9 of the EIR generally discusses the Water Forum Agreement, neither the EIR nor the *Evaluation* discuss the potential reliability impacts of purveyor specific water supplies and the intended methods to manage for such shortage conditions. H-6 cont.

Conclusion

Again, the City of Folsom is interested in efficient land-use and water supply planning, and requests that the City of Rancho Cordova ensure that the *Evaluation* reflect existing legal agreements regarding water service to the Westborough, Glenborough and Aerojet areas. If you have any questions regarding this matter or would like to discuss the specifics of the *Evaluation*, please call me at 916-351-3573.

Sincerely,

Kenneth V. Payne, P.E.
Utilities Director

Cc: Amy Feagans, Interim Community Development Director
Sam Spiegel, Interim City Manager
Bruce Cline, City Attorney
Gwyn-Mohr Tully, Tully & Young
Paul Bartkiewicz, Bartkiewicz, Kronick & Shanahan
Leo Winternitz, Water Forum/SCGA
Ed Winkler, Regional Water Authority
Herb Niederberger, Sacramento County Water Agency
Floyd Wicks, Golden State Water Company

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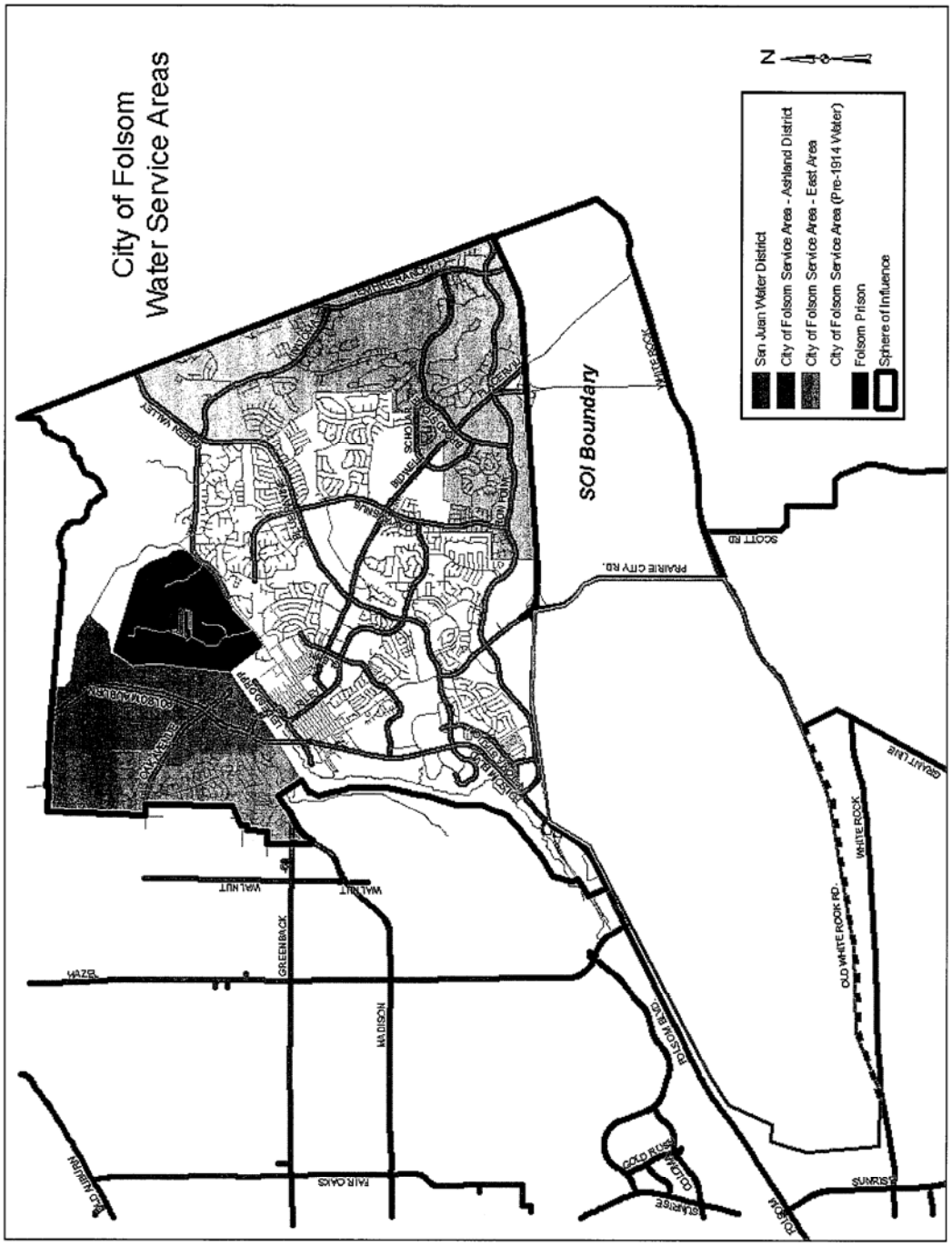
Letter H Continued

Attachment 1

Letter H Continued



Letter H Continued

Attachment 2

Letter H Continued

ds

ORIGINAL

Decision No. 71889

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of SOUTHERN CALIFORNIA WATER COMPANY and CITY OF FOLSOM for an order authorizing the sale of certain properties of Southern California Water Company.	Application No. 48786 (Filed September 13, 1966)

O'Melveny & Myers, by Donn B. Miller, for Southern California Water Company; McDonough, Holland, Schwartz, Allen & Wahrhaftig, by Martin McDonough, for City of Folsom, applicants.
John D. Reader, for the Commission staff.

O P I N I O N

This request of Southern California Water Company (seller) and City of Folsom (buyer) for authority to transfer seller's water system serving the Folsom area in Sacramento County to the City of Folsom was heard before Examiner Coffey in San Francisco and submitted for decision on November 7, 1966.

The Folsom system of seller does not lie entirely within the limits of the City of Folsom. However, substantially all of the nearly 1,500 customers served through the property to be transferred are within the city limits of the City of Folsom. The largest single customer of the system, Aerojet General Corporation, is outside the City and is served under the terms of a special contract.

On August 22, 1966, seller and buyer entered into an agreement, a copy of which is attached to the application as Exhibit II, providing for the sale of the seller's Folsom water

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Letter H Continued

A. 48786 ds

system used in connection with the performance of public utility service by seller. The agreed cash purchase price is $825,000, plus an amount equal to the cost to seller of all approved capital additions.

The properties of the Folsom District are recorded on seller's books, as of August 31, 1965, as follows:

Utility Plant	$913,280
Reserve for Depreciation	(178,197)
Advances for Construction	(109,660)
Contributions in Aid of Construction	(42,660)
Net	$582,763

Seller states that at or substantially concurrently with the sale of these properties it will repay all deposits, including accrued interest, made by its Folsom customers to establish credit.

Buyer, under the terms of the agreement, shall assume the obligations of seller for reimbursement of advances for construction under the terms of the contracts relating to such advances upon the transfer of the property associated with such advances.

Buyer, having determined to acquire the properties which are the subject of this request, petitioned this Commission in Application No. 46026 to determine the just compensation for essentially the same properties. Application No. 46026, now pending before the Commission, is being held in suspense pending the negotiations which led to the agreement herein being considered. Buyer and seller state that the agreement is preferable to the expensive and uncertain results of protracted litigation and that the compromises reflected in the agreement were arrived at in arm's length bargaining and represent an attempt to arrive at a workable and logical result rather than the parties' judgment concerning the outcome of such litigation.

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Letter H Continued

A. 48786 ds

In addition to the Folsom water system, seller also serves water in the area of Cordova which is adjacent to the Folsom system and traversed by the Valley Canal, one of the properties to be transferred to buyer. The agreement provides that buyer shall have eleven-sixteenths fractional interest in all water and water rights, in and to the flow of the South Fork of the American River, which are owned or claimed by seller on the closing date. At such time as seller can obtain the diversion of its water from the to-be-constructed Folsom South Canal, buyer will transfer to seller without cost that part of the Valley Canal below the point at which the Valley Canal is intersected by the Folsom South Canal. A witness for seller testified that there are adequate water supplies to serve present and future customers in the Cordova area and that no shortage of water was anticipated as a result of this transfer of properties in the foreseeable future.

We find that:

1. The terms of the purchase agreement adequately protect the interest of customers and refund contract holders in deposits and advances for construction.

2. Buyer has the ability to acquire and operate seller's Folsom water system without interruption in service.

3. The dedicated area of service of seller's Folsom water system extends outside of the boundaries of buyer.

4. Adequate supplies of water are available to serve seller's customers in the Cordova certificated area.

5. Upon the consummation of the proposed transfer seller will no longer be performing public utility service in the area of the properties to be sold.

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Letter H Continued

A. 48786 ds

6. Subject to the conditions set forth in the order which follows, the proposed sale and transfer will not be adverse to the public interest.

We conclude that the application should be granted as provided by the following order.

O R D E R

IT IS ORDERED that:

1. Within one year after the effective date of this order, Southern California Water Company may sell and transfer to City of Folsom the properties referred to herein, substantially in accordance with the terms described in the agreement attached to the application herein and designated as Exhibit II, but subject to the conditions of this order.

2. Before the transfer of its water system assets, seller shall return to customers any refundable deposits made to establish credit and shall file a statement that all deposits have been refunded with the Commission within ten days after said transfer.

3. The foregoing authority is conditioned upon the filing in this proceeding of a stipulation by buyer that:

(a) Buyer will be subject to all legal claims for water service which might have been enforced against seller, including such claims as may exist in territory outside of buyer's boundaries.

(b) As to the rates, rules and conditions of service which buyer will apply in the service area of the system herein authorized to be transferred, it will not discriminate between service rendered outside its city boundaries and service rendered inside said boundaries, except insofar as it may adjust such outside rates and charges to offset any reasonable tax burden sustained by water users within the city in subsidizing the operation of the city's water system.

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Letter H Continued

A. 48786 ds

4. Upon compliance with all of the conditions of this order, seller shall stand relieved of all of its public utility obligations in the area served by the transferred system, and may discontinue service concurrently with the commencement of service by buyer.

5. Within ten days after the date of actual transfer, seller shall file in this proceeding written notice of the date of transfer, the date upon which buyer shall have assumed operation of the water system authorized herein to be transferred, and a true copy of the instrument or instruments of transfer which may be executed to effect such transfer.

The effective date of this order shall be twenty days after the date hereof.

Dated at San Francisco, California, this 24th day of JANUARY 1967.

President

Commissioners

WILLIAM SYMONS, Jr.
Commissioner ..... did not participate in the disposition of this proceeding.

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Letter H Continued

DECISION NO. 71890 CASE NO. 8518 APP. NO. 48866

Letter H Continued

Attachment 3

Letter H Continued

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PLEASE RESPOND TO:
P.O. BOX 8130
WALNUT CREEK
CALIFORNIA 94596-8130

101 YGNACIO VALLEY ROAD
SUITE 450
WALNUT CREEK
CALIFORNIA 94596-4094

TELEPHONE: 925.295.3300
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DENVER, NORTHERN VIRGINIA, ORANGE COUNTY, SACRAMENTO, WALNUT CREEK, CENTURY CITY
TOKYO, LONDON, BEIJING, SHANGHAI, HONG KONG, SINGAPORE, BRUSSELS

April 27, 2006

Writer's Direct Contact
925.295.3371
SHilton@mofo.com

By Messenger

Fred Curry
Chief, Water Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Protest to Golden State Water Company Advice Letter 1210-W

Dear Mr. Curry:

The City of Folsom ("City") submits this protest to Golden State Water Company's ("Golden State") Advice Letter 1210-W, which seeks to expand Golden State's service territory to supply the Westborough development.

The Advice Letter should be permanently suspended because it seeks to invade the service territory of the City's water utility, in violation of several past Commission decisions and in breach of a contract between the City and Golden State's predecessor. That fatal flaw aside, the Advice Letter also violates General Order 103 in that it fails to show that Golden State has an adequate supply to serve its proposed extended service territory. Finally, the City, not Golden State, is in a better position to serve the Westborough development and the surrounding area. Under state law, the Commission is obligated to suspend the advice letter and conduct hearings to evaluate the City's claim that it can better serve the Westborough development. The City requests that Golden State's Advice Letter be suspended, that the Commission conduct an investigation into these issues, and that hearings be scheduled to allow the City to present the facts summarized below.

The City's Service Territory

The workpapers accompanying the Advice Letter concede that the Westborough development falls within the City's water service area. The Water Service Questionnaire includes a "Preliminary Water Supply Master Plan" (hereafter, "Master Plan") for Westborough prepared by MacKay and Somps for Golden State. That document states that "Westborough, along with the remainder of the Aerojet property north of Old White Rock

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Road, lies within the City of Folsom water service area." Master Plan at 1. Both the Commission and Golden State's predecessor Southern California Water Company ("SoCal") have recognized the City's right to serve the Aerojet property, including the site of the Westborough development, for forty years.

In the early sixties, City voters decided that the City should operate its own water system. At the time, the City and surrounding area were served by SoCal's Folsom Division. The City negotiated with SoCal to purchase the entire Folsom Division, both inside and outside the City, for $825,000. The purchase agreement was signed in 1966. As part of that agreement, SoCal agreed that it would not "sell or deliver water for resale or use within the boundaries of the Folsom Division as it existed on December 11, 1963, except to [the City] or its assigns." SoCal retained its right to serve its Cordova Division, which abutted the western edge of its Folsom Division and which SoCal's predecessor Golden State currently operates. On January 24, 1967, the Commission approved the agreement for the sale of the Folsom Division in Decision 71889, subject to several conditions, including the requirement that the City stipulate that it "will be subject to all legal claims for water service which might have been enforced against [SoCal], including such claims as may exist in territory outside of [the City's] boundaries." *Southern California Water Company*, D.71889 at 4.

Twelve years later, SoCal attempted to re-acquire some of the service territory it had sold to the City. On March 9, 1979, SoCal filed Advice Letter 541-W, seeking to expand its Cordova Division to encompass a 177 acre industrial development located in the old Folsom Division. The City filed a protest, and in Decision 91426 (March 18, 1980), the Commission permanently suspended the advice letter, finding that SoCal had contracted away its rights to serve that area under the 1966 agreement. The Commission found:

> … it must be assumed that part of the purchase price of $825,000 was in consideration of SoCal's relinquishing its right to distribute and sell water in the area. Such a relinquishment is certainly of more than nominal value to the City, since… the threat of competition from an existing public utility in the immediate vicinity is removed. The agreement contains no apportionment of the purchase price by various categories, <u>but the whole agreement makes it plain that SoCal intended to sell its entire right, title, and interest in its former Folsom Division to the City</u>.

Southern California Water Company, D.91426, 3 CPUC.2d 379, 384 (1980)(emphasis added). The Commission concluded that to allow SoCal to reenter the service area, without compensating the City for such reentry, would be an unconstitutional taking in violation of the City's constitutional rights. Similarly here, allowing Golden State to re-enter the service

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Letter H Continued

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territory that its predecessor sold to the City forty years ago would violate the City's constitutional rights and would constitute a breach of SoCal's contract with the City.

Following the Commission's decision on its advice letter, SoCal proceeded in a manner that recognized the City's rights to its old Folsom Division. Two years after the Commission decision, SoCal sought to expand its service territory into a 936 acre development called Gold River, which like the Westborough development was contained within the western portion of SoCal's old Folsom Division. To do so, SoCal contracted with the City to purchase the right to serve that portion of the old Folsom Division, and to purchase the water supply facilities located in that area, for a sum of $293,477. The developer of Gold River, Natoma Real Estate Company, also paid the City to compensate it for the loss of a portion of its service territory, paying the City $885,000 to relinquish its right to serve the development. Attached as Exhibits 1 and 2 are the Agreements with SoCal and Natoma Real Estate Company.

In contrast to the actions of its predecessor in 1982, however, Golden State has returned to the strategy of simply filing an advice letter seeking permission to expand into the City's territory. Absent an agreement with the City to relinquish its rights to this portion of its service territory, however, Golden State's Advice Letter is unlawful and an unconstitutional taking. For that reason, the Advice Letter should be suspended permanently.

The Advice Letter Fails to Establish Sufficient Water Supply to Serve Westborough

The City's contractual right to serve the Westborough Development is alone enough to require the Commission to permanently suspend the Advice Letter. That issue aside, however, the Advice Letter has other flaws. General Order 103 and Standard Practice U-14-W require that a public utility seeking to expand its service territory into a contiguous area establish that it has an adequate supply of water to serve the additional territory. As the Commission recently noted in D.05-07-045, the Cordova system relies on a combination of groundwater and American River surface water purified at the Coloma Surface Water Treatment Plant. *Southern California Water Co.*, D.05-07-045, 2005 Cal. PUC LEXIS 293, *10 - *11 (2005). High levels of perchlorate, an inorganic chemical used in solid rocket propellant and other explosives, and NDMA, used in liquid rocket fuel, have forced eleven of the Cordova system's groundwater wells out of service. There is a continuing risk that the groundwater contamination plumes will move and force additional active wells out of service. Given the groundwater concerns in the water basin in which Cordova operates, and the continued risk to its wells, there is a heightened need to ensure that Golden State has the supply necessary to serve the Westborough development.

The Water Supply Questionnaire (at page 2) states that there are 17 independent sources of supply. The Supporting Calculations, however, identify only sixteen supply sources. Fourteen of those sources are wells. The MacKay and Somps Master Plan states that six of

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the fourteen wells are threatened with closure due to contamination, resulting in a loss of 4,905 gpm. (Master Plan at 8, Table 3-3). Although the Master Plan claims that three of those wells would be treated to address the contamination, there is no plan for addressing the remaining three wells. Golden State itself submitted evidence in Application 03-10-057 that as much as 6,895 gpm of available supply may ultimately be lost. *Southern California Water Co.*, D.05-07-045, 2005 Cal. PUC LEXIS 293, *12 (2005). Groundwater extraction and treatment conducted by Aerojet as part of its remediation of the contaminated groundwater also has the potential to draw-down the groundwater basin, potentially significantly decreasing the amount of water available from the fourteen identified wells.

Furthermore, the maximum gpm listed for each of the wells is a flow rate; there is no information concerning the estimated actual quantity of water that could be produced from these wells. There are numerous reasons why the maximum gpm could not be sustained for any length of time. For example, extracting the maximum gpm from each well could run the risk of drawing contamination plumes to those wells and result in additional draw-down of the groundwater basin, resulting in further well closures and an even greater loss of supply. Thus, the quantity of water available from these wells may be far less than the flow rates listed in the Water Supply Questionnaire suggest. In order to determine whether Golden State has a sufficient supply to serve the Westborough development, the Commission must obtain information concerning the actual quantity of water available to Golden State.

The two other sources identified in Section A are water treatment plants: the Coloma Surface Water Treatment Plant and the Pyrites Surface Water Treatment Plant. First, water treatment plants are not a "source" of water; they only treat the water from a potential source. Golden State has not identified the source of the water that would be treated by these facilities. Obviously, even if these facilities can treat a combined amount of 10,290 gpm, as Golden State claims, if the sources that supply those facilities can only produce 5,000 gpm, Golden State will have significantly overstated its supply. Because neither the Advice Letter nor the workpapers accompanying it indicate either the source or the quantity of water that would be treated by these plants, the Advice Letter filing has failed to establish that the utility has a sufficient supply to serve the Westborough development.

Finally, the MacKay and Somps' Master Plan concludes that supply for the Westborough development, once built out, would be "dependent on delivery of available treated GET water to the site." According to the Master Plan:

> Aerojet and Sacramento County have entered an agreement that transfers the rights to the treated GET water to Sacramento County. According to the agreement, the County is to utilize the water to replace water production lost due to the contamination of water supply wells of local water purveyors

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> in the surrounding area. Remaining water is to be used to serve the water supply needs on the Aerojet property.

Master Plan at 6. Golden State has not submitted to the Commission the agreement between Aerojet and Sacramento County. Nowhere does the Advice Letter or the workpapers identify the quantity of treated GET water to which Golden State may be entitled. Given the risk to Golden State's groundwater supplies, the availability of a significant supply of GET water will be essential to meet the future needs of the Westborough development.

The lack of any detailed description of Golden State's legal right to GET water is of particular concern to the City. As noted in the Master Plan, the City currently supplies the Aerojet property with both treated potable and raw water. The City is concerned that the use or extraction of the GET water may somehow implicate the water it supplies to the property, and may thus have an effect on how the City will serve its water customers in the future. At a minimum, hearings need to be conducted to determine the legal basis for Golden State's claim to the GET water, and the quantity that Golden State will have available to supply the Westborough development.

In sum, Golden State must establish that it has the right to sufficient water to serve the Westborough Development, or the Commission should suspend the Advice Letter permanently.

The City may be better positioned to serve the Westborough Development

Setting aside the City's legal right to serve the Westborough development and surrounding area, because the City has been responsible for water service in this area for over forty years, it is in a better position to supply the Westborough development and surrounding area than Golden State. The Commission should therefore suspend the advice letter and allow the City to continue to serve this area.

Generally, the Commission lacks jurisdiction over utility operations conducted by a public agency. If a public agency claims that it can better serve an area into which a utility seeks to expand, however, the Commission has the jurisdiction, indeed the obligation, to evaluate the public agency's claims before granting the utility's request to expand its service territory. *Ventura County District Waterworks v. CPUC*, 61 Cal.2d 462 (1964); *see also Great Oaks Water Company*, D.91-02-039, 39 CPUC.2d 339 (1991). The Commission must hold hearings to evaluate which entity can better serve the contested area, and if it concludes that the public agency's service would be superior, it must deny the utility's request to serve the area. *Id.* Here, the facts show that the City can provide superior and more cost effective service than Golden State.

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First, as noted above, there are serious questions concerning whether Golden State has sufficient supply to serve the Westborough development. That concern is only exacerbated by the fact that the Advice Letter has significantly understated the area to be served. What the Advice Letter has identified as the "Westborough development" is in fact only Phase One of that development. *See* Attachment C at 49 (showing Phase One and Phase Two areas). On page one of the Advice Letter, it states that the development will consist of 3,802 dwelling units when fully developed. The MacKay and Somps Master Plan states that the development consists of 1,137.5 acres. The Rancho Cordova General Plan (Attachment C to the workpapers), however, describes the Westborough development as including approximately 6,078 dwelling units, and encompassing approximately 1,518 acres. Attachment C at 47. The Rancho Cordova General Plan estimates that *both* Phase One and Phase Two will be completed within the next five to ten years. Attachment C at 48. Furthermore, the Rancho Cordova General Plan also includes a second development within the City's service territory and east of the Westborough development. That development, called Glenborough, encompasses 1,366 acres and includes approximately 4,434 additional dwelling units. Attachment C at 19. Like Westborough, the General Plan estimates that Glenborough will be completed within the next ten years. Given the concerns about Golden State's ability to obtain sufficient supply to serve even Phase One, there is an even greater concern about whether Golden State would have the ability to meet demand once Phase Two and the Glenborough development are completed. Thus, the Advice Letter and supporting workpapers have significantly understated the supply needs of the area, and fail to establish that Golden State can meet those needs.

Nor should the Commission allow Golden State to serve Phase One on the assumption that another utility could serve Phase Two, and the Glenborough development. The Commission prefers service territories extended under Section 1001 authority to "be defined by logical natural boundaries, avoiding small unserved enclaves or peninsulas, and they may not be gerrymandered to exclude customers or potential customers." *Cal. Water Service Co.*, D.83-01-054, 10 CPUC.2d 690, *18 (1983). Having two utilities serve the Westborough development would also be less efficient, and would likely require a duplication of facilities. Therefore, it would go against Commission policy to allow Golden State to serve Phase One if another utility would be obligated to serve Phase Two.

Second, as noted above, the City already provides water service to the Aerojet property. It therefore has some of the infrastructure necessary to serve the Westborough development already in place. The cost of building the necessary infrastructure to serve Westborough may be significantly less if the City, rather than Golden State, provides water service.

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Third, the City's water rates are currently and have been historically much lower than Golden State's. Regardless of what the developer of the project may choose,[1] the City may be the preferable provider from the point of view of future residents of the development given its low rates.

Finally, the Sacramento County's General Plan, adopted in 1993 and modified in 1998, favors water utilities run by public agencies such as the City over those run by private utilities such as Golden State. The Public Facilities Element of the General Plan states:

> PF-2. Municipal and industrial development within the Urban Services Boundary but outside of existing water purveyors' service area shall be served by either annexation to an existing public agency providing water service or by creation or extension of a benefit zone of the SCWA (Sacramento County Water Agency).

Therefore, the County's own policies favor continued service to this area by the City.

Conclusion

The City would welcome the opportunity to attempt to work out a resolution mutually acceptable to both the City and Golden State, but it needs time to pursue such discussions. It is the City's understanding that water service for the Westborough development will not be needed until 2009. While the issues raised above should be resolved expeditiously, the Commission nevertheless has the time to do a complete investigation, and to allow the parties to discuss potential resolution. The City requests that the Commission suspend the Advice Letter to allow the parties the opportunity to discuss potential resolution, as well as affording the Commission the ability to conduct a full investigation of the issues raised above, including hearings.

Sincerely,

Seth D. Hilton

Enclosures

[1] The fact that the developer has apparently requested service from Golden State is not dispositive. *See Ventura County District Waterworks*, 61 Cal.2d at 465-66 (holding that despite developer's request for service from the utility, the Commission was still required to weigh whether the utility or the public agency could better serve the disputed area).

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Letter H Continued

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **PROTEST TO GOLDEN STATE WATER COMPANY ADVICE LETTER 1210-W.**. Service was effected by one or more means indicated below:

☒ Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid ***(Via First Class Mail)***;

☐ Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand to the offices of each addressee ***(Via Courier)***;

☒ Transmitting the copies via facsimile, modem, or other electronic means ***(Via Electronic Means)***.

On the following person:

Golden State Water Company
Attn: Ronald Moore
630 East Foothill Blvd.
San Dimas, CA 91773
rkmoore@gswater.com

Executed this 27th day of April, 2006, at Walnut Creek, California.

Alma J. Gilligan, CCLS

Alma J. Gilligan, CCLS
MORRISON & FOERSTER LLP
101 Ygnacio Valley Road
P. O. Box 8130
Walnut Creek, CA 94596-8130
(925) 295-3300

wc-118550

Letter H Continued

EXHIBIT 1

Letter H Continued

04/24/2006 13:43 FAX 19163515603 FOLSOM UTILITES DEPT 002/038

AGREEMENT FOR THE PURCHASE AND SALE
OF CERTAIN ASSETS OF
THE CITY OF FOLSOM

This Agreement is made and entered into as of the 11th day of March, 1982, by and between the CITY OF FOLSOM, a California municipal corporation ("Seller"), and SOUTHERN CALIFORNIA WATER COMPANY, a California corporation ("Buyer").

W I T N E S S E T H:

WHEREAS, Seller has represented to Buyer that Seller owns certain real and personal properties used to supply water to an area in an unincorporated portion of Sacramento County which has a northern boundary which runs along the American River, a western boundary which runs along Citrus Road and Sunrise Boulevard and an irregular boundary to the south and west which generally runs along the Folsom South Canal, but excluding Parcel No. 72-23-14 consisting of approximately 11.38 acres located north of the Folsom South Canal, as set forth on Exhibit A hereto (the "Area"), and desires to sell such properties to Buyer; and

510-02 C 2-82-01

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WHEREAS, Buyer has represented to Seller that Buyer owns water systems in eleven counties in California serving approximately 220,000 customers, Buyer's Cordova service area is contiguous to the area now served by Seller, Buyer has the experience and personnel to provide water service to the customers in the area now served by Seller and Buyer desires to acquire certain of Seller's properties.

NOW, THEREFORE, for and in consideration of the mutual promises and agreements herein contained and for other good, valuable and adequate consideration, Seller and Buyer agree as follows:

SECTION 1. DESCRIPTION OF ASSETS AND PROPERTIES

The properties of Seller to be acquired by Buyer (the "Property") are the properties, real, personal or mixed, used by Seller in connection with the rendering of water service to the Area, as more fully described below:

(a) Real Property. Those certain parcels of real property situated in the County of Sacramento, State of California and those certain easements and rights of way listed in Sections (a) and (b), respectively,

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of Schedule A hereto, together with any and all improvements thereon and all waterworks or other property or equipment of any kind affixed thereto or situated thereupon on the date hereof and that are acquired by Seller prior to the Date of Closing, as defined below.

(b) Water Works Facilities. All pipes, valves, service connections, meters, hydrants, wells, pumps, pressure tanks, other waterworks facilities and other properties that are a part of Seller's water system serving the Area on the date hereof and that are acquired by Seller to serve the Area prior to the Date of Closing.

(c) Rights of Way and Certificates. All rights of way, licenses, permits, easements, franchises and other rights that are a part of, or are necessary, useful or incidental to the operation of, Seller's water system and are claimed, owned or used by Seller on the date hereof and that are acquired by Seller prior to the Date of Closing.

(d) Books and Records. All deeds, books, maps and records of Seller relating to the Property or

Letter H Continued

the operation of Seller's water system, including but not limited to operating records of every nature, engineering records, accounting records (including invoices for materials and services purchased) and billings records.

HOWEVER, the Property does not include the following:

A. Surface Water Rights. Any rights to surface water.

B. Cash and Accounts Receivable. The cash and accounts receivable owned by Seller on the Date of Closing.

Buyer is not assuming or acquiring any of Seller's liabilities, commitments or obligations, including any liabilities customarily covered by liability insurance. Without limiting the generality of the foregoing sentence, it is expressly understood that Buyer is not assuming or acquiring any liability, commitment or obligation with respect to any litigation, claim or administrative proceeding, whether existing, pending or threatened at the opening of business on the date hereof or on the Date of Closing,

Letter H Continued

or arising thereafter, to the extent such litigation, claim or proceeding arises out of or is based upon the conduct of the business or operations of Seller on or before the Date of Closing or arises out of or is based upon personal injuries or damage to property owned by third parties, occurring on the Property, on or before the Date of Closing. Any such liabilities shall remain the obligation of Seller, and Seller shall indemnify and hold Buyer harmless from any claim, judgment, loss or obligation with respect thereto.

SECTION 2. REPRESENTATIONS BY SELLER

Seller represents, warrants, covenants and agrees that:

(a) Organization and Standing of Seller. Seller is a municipal corporation duly organized and existing and in good standing under the laws of the State of California with full corporate power to own the Property and to provide water service to the Area.

(b) Seller's Authority. The execution, delivery and performance of this Agreement by Seller will

Letter H Continued

be duly authorized by the City Council of Seller prior to the Date of Closing. No further action or filing is necessary for the valid execution, delivery and performance of this Agreement by Seller and the consummation of the transactions contemplated hereby. Seller's execution, delivery and performance of this Agreement will not result in the breach of any term or provision of, constitute a default under, or conflict with state statutes and regulations governing general law cities in California or any indenture, mortgage, deed of trust, agreement, instrument, judgment, decree, order, statute or governmental regulation to which Seller is a party or which is applicable to Seller or the Property.

(c) Seller's Title to Property. Except as set forth on Schedule B hereto, Seller has good and marketable title to the Property, and on the Date of Closing Seller will transfer to Buyer good and marketable title to the Property (except such of the Property as may be consumed by use and replaced by substantially equivalent properties or disposed of in the ordinary course of business) free and clear of any and all liens, charges, mortgages, encumbrances,

Letter H Continued

claims or equities of any kind whatsoever, except those items expressly disclosed in this Agreement or accepted by Buyer pursuant to Section 3(b) of this Agreement.

(d) No Litigation. Except as set forth on Schedule C hereto, there is no litigation, investigation or administrative, arbitral or other proceeding pending or, to the knowledge of Seller, threatened against Seller which affects or may affect the Property, the sale of the Property under this Agreement or any other terms of this Agreement. Seller is not aware of any facts that could reasonably form the basis for such litigation, investigation or proceeding. In the event that any such litigation, investigation or proceeding shall be commenced or, to Seller's knowledge, threatened with respect to Seller or any part of the Property, Seller shall, promptly upon receipt of notice thereof, notify Buyer in writing at the address set forth below.

(e) Compliance with Law. To the best of its knowledge, Seller has complied fully in all material respects with all laws, regulations, ordinances (including

Letter H Continued

zoning ordinances, the Subdivision Map Act, and Parcel Map Ordinances, to the extent applicable) and orders applicable to Seller.

(f) Documents. Seller has delivered to Buyer, or will deliver to Buyer within 10 days of the date hereof, true, complete and accurate copies of the following documents (provided, however, that if any such documents have not yet been received by Seller, Seller shall deliver such documents to Buyer promptly upon receipt by Seller):

(i) A copy of Seller's California Department of Public Health Water Supply Permit and accompanying resolution granting such permit;

(ii) All available documents, correspondence, briefs, pleadings, memoranda, or orders related to any litigation, investigation or administrative, arbitral or other proceeding affecting the Property except for documents related to Application No. 46026 before the California Public Utilities Commission ("P.U.C."), Decision No. 71889 of

Letter H Continued

the P.U.C., Advice Letter 541-W filed with the P.U.C. and Decision No. 91426 of the P.U.C.; and

(iii) Any and all instruments creating a restriction, charge or encumbrance on all or any part of the Property.

(g) Actions Since the Date of this Agreement Since the date of this Agreement, Seller has not sold, leased or encumbered, or agreed to sell, lease or encumber, any of the Property.

(h) Absence of Misleading Statements. No document or other material delivered to Buyer in connection with this Agreement contains or will contain any misleading or untrue statements or omit to state any facts necessary to make the statements made not misleading.

(i) Condition of Property. Except as set forth in Schedule D hereto, all pipes, valves, service connections, meters, wells, pumps, pressure tanks and other waterworks facilities included in the Property

Letter H Continued

are on the date hereof, and will be on the Date of Closing, in working order to at least the same extent as on February 23, 1982, when portions of such facilities were inspected by Buyer's representative.

SECTION 3. COVENANTS AND CONDITIONS

(a) Service by Buyer. After the Date of Closing, Buyer shall render public utility water service in accordance, in all material respects, with its filed rules and tariffs in the Area, and any required water distribution facilities will be installed in accordance with General Order No. 103 of the P.U.C. Buyer will apply its Cordova Metered Tariff Rates to accounts of purchasers of water in the Area.

(b) Consent to Providing Water Service. Seller shall not at anytime after the Closing Date object to Buyer's providing water service in the Area.

(c) Title Policy and Reports. Seller, at its own expense, shall furnish to Buyer at the Closing a standard CLTA owner's policy of title insurance issued by Title Insurance and Trust Company (the

Letter H Continued

"Policy"). The Policy shall specify liability in the amount of $15,000, shall be in form satisfactory to Buyer, shall cover the parcels of real property, exclusive of easements and water rights, included in the Property, and shall insure Buyer's title thereto, subject only to:

(i) General and special real property taxes not delinquent;

(ii) Utility easements to service the Property which do not interfere with its existing use; and

(iii) Such other liens, easements, encumbrances, covenants, conditions and restrictions as may be approved in writing by Buyer.

Seller shall use its best efforts to submit to Buyer within thirty (30) days after the date hereof a Preliminary Title Report dated as of not more than twenty (20) days from the date hereof (the "Title Report"), together with copies of all recorded documents mentioned therein, showing the state of the

Letter H Continued

title to said real property. Buyer shall notify Seller not more than fifteen (15) days after the receipt of such Title Report whether any matters disclosed therein are, in the opinion of Buyer, encumbrances of such a nature as to materially impair or interfere with the use of the Property in Buyer's water utility business or preclude Buyer from including such property as bondable property under Buyer's First Mortgage Bond Indenture. Any matter affecting title other than non-delinquent taxes disclosed in the Title Report and not specified in such notice is deemed to be an "encumbrance." Within fifteen (15) days after receipt of such notification from Buyer, Seller shall notify Buyer of any matter specified by Buyer in such notice which Seller elects not to remove and, upon receipt of such notice, Buyer shall have the option to terminate this Agreement. Such right shall be exercised by Buyer by notice to Seller not later than five (5) days after the receipt by Buyer of notification from Seller of its election not to remove such matters. Failure of Buyer to notify Seller within said five (5) days shall be deemed a waiver by Buyer of the right to

Letter H Continued

terminate this Agreement pursuant to this Section 3(b).

(d) Conduct Prior to Closing. Between the date hereof and the Date of Closing, Seller shall not, without the written consent of Buyer transfer or encumber or voluntarily limit or restrict its ownership of, or its legal right to use, any property owned or used by it as of the date hereof which would be, if owned or used by the Seller on the Date of Closing, a part of the Property, except for properties consumed and replaced by substantially equivalent properties, or disposed of in the ordinary course of business.

(e) Billing and Collecting. Seller will pay to Buyer any water bill collections by Seller for water service rendered to purchasers of water in the Area, after the Date of Closing; and Buyer will pay to Seller any amounts received by Buyer for water service rendered prior to and including the Date of Closing to purchasers of water in the Area.

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(f) Expenses of Transaction. Except as otherwise expressly provided herein, Seller and Buyer, respectively, shall pay their respective costs and expenses in preparing and performing this Agreement and the transactions contemplated hereby.

(g) Expenses of Operating Property. Seller shall operate the Property and pay all expenses associated with the Property and the operation thereof, including but not limited to utility and telephone expenses, through the Date of Closing. Subject to completion of the Closing on the Closing Date, Buyer shall pay all such expenses for the period subsequent thereto.

(h) Taxes. Seller shall pay all conveyance or deed stamp taxes which may be required to be paid in respect of the transfer of any real property hereunder. All ad valorem taxes with respect to the Property, whether prepaid or whether constituting a lien payable against it at the Date of Closing, shall be prorated between Seller and Buyer as of 12:01 o'clock a.m. on the Date of Closing.

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(i) Property Damage Insurance. Seller will, except as prevented by causes beyond its control, maintain in full force and effect from the date hereof to and including the Date of Closing such policies of insurance in such amounts as are customarily maintained by Seller with respect to property damage on the Property.

(j) Inspection. Until the Date of Closing, Buyer's representatives may at any time and from time to time inspect the Property during normal business hours.

(k) Maintenance. Between the date hereof and the Closing Date, Seller will maintain its water system in working order and continue to perform maintenance and repairs in accordance with its customary practices.

(l) Further Assurances. Seller shall, without further consideration, deliver such additional instruments of conveyance, transfer or assignment and shall take such other action as Buyer may reasonably request

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to effect or evidence the transfer of the Property to Buyer.

(m) P.U.C. Advice Letter. Within three days of the date hereof, Buyer shall file with the P.U.C. an Advice Letter requesting an extension of its service area to include the Area, and Seller will file a letter with the P.U.C. stating that it does not object to such an extension. Each party will cooperate fully in requesting such extension from the P.U.C. and shall take such further action with respect to such Advice Letter as may be reasonably requested by counsel.

SECTION 4. AGREEMENT OF PURCHASE AND SALE

Upon the terms and conditions herein set forth, the Buyer agrees to buy from Seller and Seller agrees to sell, convey, assign, transfer and deliver to Buyer the Property, free and clear of any and all liens, charges, mortgages, encumbrances, claims or equities, except those that are expressly disclosed in this Agreement or that are accepted by Buyer in accordance with Section 3(b).

Letter H Continued

SECTION 5. DOCUMENTS OF TRANSFER

The Property shall be conveyed by Seller to Buyer by grant deed and bill of sale or other conveyances (the "Documents of Transfer") in form and substance satisfactory to Buyer and sufficient to convey to Buyer good and marketable title to the Property (subject only to those defects expressly disclosed in this Agreement or accepted by Buyer pursuant to Section 3(b)).

SECTION 6. TIME OF TRANSFER AND CLOSING

The date and time of transfer and closing (the "Date of Closing" or "Closing Date") shall be as mutually agreed upon by the parties, but shall be no later than April 15, 1982. The Closing shall be held at the offices of Downey, Brand, Seymour & Rowher, 550 Capitol Mall, Suite 1050, Sacramento, California, or at such other place as may be mutually agreed upon by the parties.

At the Closing, and subject to the terms and conditions herein set forth, (i) Seller shall deliver to Buyer the Documents of Transfer, together with all other assignments, certificates or documents required

Letter H Continued

hereunder or reasonably requested by Buyer, and (ii) Buyer shall deliver to Seller a certified or bank cashier's check for the amount of the purchase price set forth in Section 9.

SECTION 7. CONDITIONS PRECEDENT TO BUYER'S OBLIGATIONS

The obligations of Buyer hereunder are subject to fulfillment of each of the following conditions:

(a) Representations by Seller True at Closing. All representations by Seller which are contained in this Agreement shall be true on and as of the Date of Closing as though said representations were made at and as of such time, and Seller shall have delivered to Buyer one or more certificates, dated the Date of Closing, properly executed and verified, certifying, in such detail as Buyer may reasonably request, that the conditions set forth in Sections 7(c), 7(d), 7(f) and 7(g) have been satisfied or fulfilled.

(b) Performance of Seller. Seller shall have performed and complied with all agreements or covenants

Letter H Continued

required by this Agreement to be performed and complied with by it prior to or on the Date of Closing.

(c) Loss or Destruction of Properties. The Property shall not have suffered any material damage (whether or not the loss therefrom shall have been insured) by fire, flood, accident or other calamity.

(d) Opinion of Counsel. Seller shall have delivered to Buyer an opinion of Downey, Brand, Seymour & Rowher in form and substance satisfactory to the Buyer to the effect that:

(i) Seller is a municipal corporation duly organized and in good standing under the laws of the State of California, with full corporate power to own its property and to provide water service in the Area.

(ii) This Agreement has been duly and validly authorized, executed and delivered by Seller and is valid and binding upon Seller in accordance with its terms, and the Agreement and the transactions contemplated herein have been duly

Letter H Continued

and validly authorized by all necessary action of Seller and its City Council, and no further proceedings are required;

(iii) All instruments of transfer delivered by Seller to Buyer under this Agreement have been duly and validly authorized, executed and delivered by Seller and are sufficient in form to vest in Buyer good and marketable title to the Property (except for defects expressly disclosed in this Agreement or accepted by Buyer pursuant to Section 3(b) hereof);

(iv) Except as expressly disclosed in this Agreement or the Policy, such counsel is not aware of any claims, charges or encumbrances which are or may become a lien against the Property or which may adversely affect or limit Buyer's title to the Property or Buyer's use of the Property in Buyer's water utility business; and

(v) To the best knowledge of such counsel, there are no suits, investigations or other

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proceedings against or affecting Seller or the Property that are not disclosed in this Agreement or otherwise disclosed to Buyer in writing.

(e) City Council Approval. The consummation of the transactions contemplated by this Agreement shall have been duly and validly approved by Seller's City Council, and Seller shall have delivered to Buyer copies of the official resolutions by which such approval was effected or obtained, together with (i) copies of Seller's Staff recommendation and summary used to solicit such City Council approval, and (ii) Seller's certificate to the effect that such approvals have been duly and validly obtained, have not been rescinded or modified and are in full force and effect on the Date of Closing.

(f) Absence of Litigation, etc. No suit, investigation or other proceeding of the character described in Section 2(d) shall have been initiated or, to the knowledge of Seller, threatened.

(g) Instruments of Conveyance. All instruments of conveyance, assignment, consent or grant necessary

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or desirable to effectuate the purpose and intent of this Agreement have been delivered to Buyer.

(h) Title Policy. Buyer shall have received the Policy.

(i) Extension of Service Territory. The P.U.C. shall have granted Buyer's request to extend its service area to include the Area.

(j) Water Supply Permit. The California Department of Public Health shall have issued a water supply permit for the Property.

SECTION 8. CONDITIONS PRECEDENT TO SELLER'S OBLIGATION

The obligations of Seller hereunder are subject to each of the following conditions:

(a) Performance of Buyer. Buyer shall have performed and complied with all agreements or conditions required by this Agreement to be performed and complied with by Buyer prior to or on the Date of Closing.

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(b) Opinion of Counsel. Buyer shall have delivered to Seller an opinion of O'Melveny & Myers, in form and substance satisfactory to Seller to the effect that:

(i) Buyer is a corporation duly organized and in good standing under the laws of the State of California; and

(ii) This Agreement has been duly and validly authorized, executed and delivered by Buyer and is legally valid and binding upon Buyer in accordance with its terms, and the Agreement and the transactions contemplated herein have been duly and validly authorized by all necessary corporate action of Buyer, and no further corporate proceedings are required; and

(c) Extension of Service Territory. The P.U.C. shall have granted Buyer's request to extend its service area to include the Area; and

(d) Agreement between Seller and the Natomas Real Estate Company. Seller shall have entered into

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an Agreement with the Natomas Real Estate Company regarding water service to the Gold River Development and Seller and the Natomas Real Estate Company shall have performed and complied with all agreements or covenants required by such Agreement to be performed and complied with by it prior to or on the Date of Closing.

SECTION 9. PURCHASE PRICE

The purchase price to be paid for the Property is $293,477 to be paid at the Closing as provided in Section 6 of this Agreement.

SECTION 10. SURVIVAL OF REPRESENTATIONS AND WARRANTIES

The representations and warranties set forth in Section 2 of this Agreement shall survive the Closing regardless of any investigation made by the Buyer or on its behalf.

Letter H Continued

SECTION 11. NOTICES

All notices, requests, demands or other communications hereunder shall be in writing and shall be deemed to have been duly given if delivered or mailed, first class registered mail, postage prepaid: (a) if to Seller, to City Administrator, City of Folsom, 50 Natoma Street, Folsom, California 95630 (or at such other address as Seller may have furnished to Buyer in writing), with a copy to James Day, Esq., Downey, Brand, Seymour & Rowher, 555 Capitol Mall, Suite 1050, Sacramento, California 95814, and (b) if to Buyer, to Mr. Charles L. Stuart, Vice President, Southern California Water Company, 3625 West Sixth Street, Los Angeles, California 90020 (or such other address as Buyer may have furnished to Seller in writing), with a copy to Guido R. Henry, Esq., O'Melveny & Myers, 611 West Sixth Street, Los Angeles, California 90017.

SECTION 12. COUNTERPARTS

This Agreement may be executed simultaneously in one or more counterparts, each of which shall be deemed to be an original, but all of which together shall constitute one and the same instrument.

Letter H Continued

SECTION 13. ASSIGNABILITY

This Agreement is not assignable by either party, and the covenants, conditions and provisions hereof are and shall be for the exclusive and sole benefit of the parties hereto, and nothing herein, expressed or implied, is intended or shall be construed to confer upon or to give any person or corporation other than the parties hereto any right, remedy or claim, legal or equitable, under or by reason of this Agreement.

SECTION 14. TERMINATION

This Agreement shall terminate at the option of either party if not performed on or before April 15, 1982. Each of the parties hereto agrees to exercise its best efforts to complete and close the transactions contemplated hereby as soon as possible and, in any event, prior to such date.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement or caused this Agreement to be executed in their respective corporate names, by their respective officers thereunto duly authorized and their

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respective corporate seals to be hereunto affixed and duly attested as of the day and year first above written.

CITY OF FOLSOM,
a California municipal corporation

By _____
Mayor

(SEAL) By _____
City Clerk

SOUTHERN CALIFORNIA WATER COMPANY,
a California corporation

By Charles L. Stuart
Charles L. Stuart
Vice President

(SEAL) By _____
C. W. Plemons
Secretary

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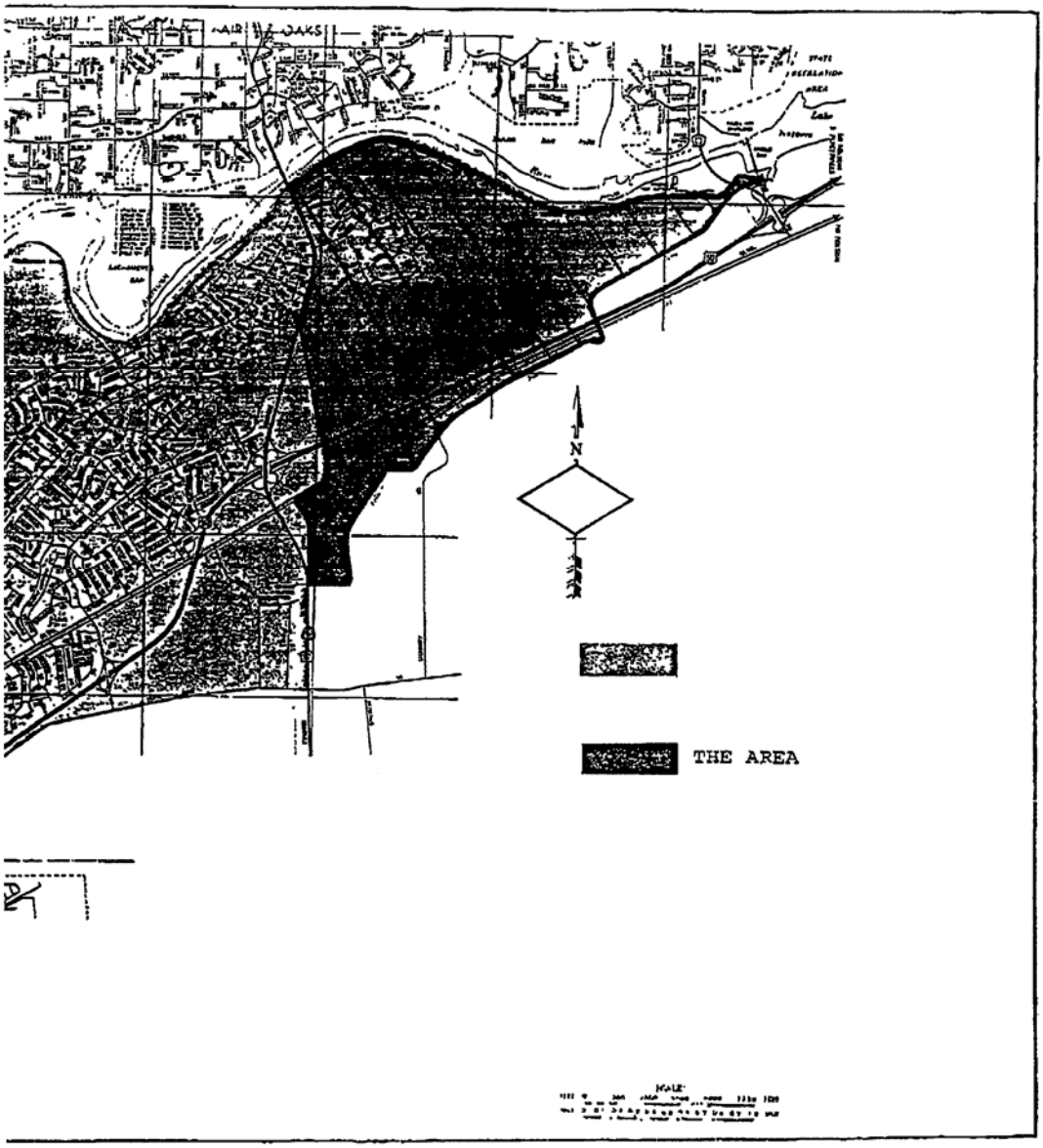

EXHIBIT A

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SCHEDULE "A"
TO AGREEMENT FOR THE PURCHASE AND SALE
OF CERTAIN ASSETS OF THE CITY OF FOLSOM

SECTION A - DESCRIPTION OF REAL PROPERTY TO BE CONVEYED IN FEE

Parcel 1:

All that portion of that certain Record of Survey entitled "Portion of Natomas Company American River Properties Rancho Rio De Los Americanos", filed in the office of the Recorder of Sacramento County, California, on October 9, 1958, in Book 13 of Surveys, Map No. 44, described as follows:

BEGINNING at a point from which the most Southerly corner of said Record of Survey bears the following two (2) courses and distances: (1) South 26° 07' 00" East 570.75 feet to a point in the Northwesterly line of Folsom Boulevard, being also in the Southeasterly line of said Record of Survey and (2) along said Northwesterly line of Folsom Boulevard South 57° 20' 35" West 1910.19 feet; thence from said point of beginning North 26° 07' 00" West 55.63 feet; thence North 71° 12' 20" East 19.84 feet; thence Northeasterly along the arc of a tangent curve to the left having a radius of 397.25 feet, subtended by a chord bearing North 68° 16' 00" East 40.73 feet; thence South 24° 40' 20" East 50.00 feet; thence South 63° 53' 00" West 59.03 feet to the point of beginning.

Parcel 2:

All of the portion of that certain Record of Survey entitled "Portion of Natomas Company American River Properties Rancho Rio De Los Americanos", recorded in the office of the Recorder of Sacramento County, in Book 13 of Surveys, Map No. 44, described as follows:

BEGINNING at a point located in said Record of Survey from which the point of intersection

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of the Easterly right of way line of the Southern Pacific Railroad Company with the Northwesterly right of way line of Folsom Boulevard bears the following five (5) courses and distances: (1) South 19° 13' 30" East 60.44 feet, (2) South 63° 53' 00" West 1255.62 feet, (3) South 65° 18' 56" West 1479.73 feet, (4) South 11° 47' 40" East 722.79 feet and (5) South 05° 38' 55" West 482.07 feet, said point of beginning is further described as being located North 63° 53' 00" East 100.0 feet from the most Easterly corner of that certain 10.000 acre tract of land described in the Deed executed by Sacramento Region Industrial Foundation, to Philip H. Kolby and Frances L. Kolby, his wife, and Wan Seegmiller and Lavere B. Seegmiller, his wife, recorded in the office of said recorder in book 4641 of Official Records, page 317; thence from said point of beginning, parallel with the Easterly boundary of said 10.000 acre tract of land, North 19° 13' 30" West 130.00 feet; thence North 63° 53' 00" East 20.00 feet; thence South 19° 13' 30" East 130.00 feet; thence South 63° 53' 00" West 20.00 feet to the point of beginning.

SECTION b - EASEMENTS AND RIGHTS-OF-WAY

All of those certain easements and right-of-way described in the instruments recorded in the office of the Sacramento County Recorder at the below-listed books and pages of Sacramento County Official Records:

BOOK		PAGE	BOOK		PAGE
2924	OR	67	3269	OR	23
2982	OR	155	3269	OR	26
3069	OR	91	3269	OR	29
3228	OR	578	3317	OR	280
3229	OR	275	3317	OR	283
3265	OR	205	3420	OR	554

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BOOK		PAGE	BOOK		PAGE
3427	OR	465	3972	OR	451
3433	OR	184	3984	OR	434
3457	OR	292	3990	OR	409
3457	OR	295	4008	OR	849
3457	OR	298	4008	OR	850
3512	OR	13	4008	OR	851
3546	OR	251	4008	OR	852
3555	OR	320	4008	OR	853
3612	OR	565	4008	OR	854
3629	OR	624	4008	OR	855
3631	OR	354	4008	OR	858
3767	OR	511	4008	OR	861
3770	OR	370	4008	OR	864
3770	OR	373	4020	OR	847
3853	OR	349	4020	OR	850
3853	OR	352	4041	OR	614
3856	OR	186	4063	OR	972
3861	OR	541	4095	OR	97
3861	OR	544	4105	OR	239
3869	OR	87	4112	OR	198
3908	OR	239	4156	OR	150
3908	OR	242	4609	OR	479
3908	OR	245	4611	OR	642
3913	OR	553	4625	OR	30

04/24/2006 MON 12:43 [TX/RX NO 7596] 032

Letter H Continued

04/24/2006 13:45 FAX 19163515603 FOLSOM UTILITES DEPT 033/038

BOOK		PAGE
4639	OR	435
77 1215	OR	1215
80 1124	OR	844

Together with the following described rights-of-way and easements in connection with Parcel 1 described in Section a of this Schedule lying on, over, and across the Record of Survey therein described, as follows:

A right of way and easement, but not the exclusive right for ingress and egress, on, over, and across that portion of said Record of Survey, described as follows:

A strip of land 12.00 feet in width where measured at right angles, the Southwesterly line of which is described as follows:

Beginning at the same point of beginning as the above described parcel of land; thence from said point of beginning South 26° 07' 00" East 570.75 feet to a point in the Northwesterly line of Folsom Boulevard.

A right of way and easement for an underground pipe line over and across that portion of said Record of Survey, described as follows:

A strip of land 3.00 feet in width, the center line of which is described as follows:

Beginning at a point on the Easterly line of the above described parcel of land from which the most Easterly corner bears South 24° 40' 20" East 46.00 feet; thence from said point of beginning North 68° 33' 00" East 13.00 feet; thence North 21° 27' 00" West 49.16 feet to the Southeasterly line of the Freeway deeded to the State of California.

04/24/2006 MON 12:43 [TX/RX NO 7596] 033

Letter H Continued

04/24/2006 13:45 FAX 18163515603 FOLSOM UTILITES DEPT 034/038

SCHEDULE "B"
TO AGREEMENT FOR THE PURCHASE AND SALE
OF CERTAIN ASSETS OF THE CITY OF FOLSOM

EXCEPTIONS TO TITLE

As to Parcel 1 described in Section a of SCHEDULE A attached hereto and the easements and rights-of-way referenced in Section b of SCHEDULE A attached hereto as being in connection with such Parcel 1:

Existing right-of-way of the Natomas Water Company's so-called "Valley Ditch" as shown and designated on various unrecorded maps of Natomas Company.

As to Parcel 2 described in Section a of SCHEDULE A attached hereto:

Covenants, conditions, and restrictions embodied in the declaration recorded June 28, 1974, Book 740628, Official Records, page 77.

04/24/2006 MON 12:43 [TX/RX NO 7596] 034

Letter H Continued

SCHEDULE "B"
TO AGREEMENT FOR THE PURCHASE AND SALE
OF CERTAIN ASSETS OF THE CITY OF FOLSOM

EXCEPTIONS TO TITLE

As to Parcel 1 described in Section a of SCHEDULE A attached hereto and the easements and rights-of-way referenced in Section b of SCHEDULE A attached hereto as being in connection with such Parcel 1:

Existing right-of-way of the Natomas Water Company's so-called "Valley Ditch" as shown and designated on various unrecorded maps of Natomas Company.

As to Parcel 2 described in Section a of SCHEDULE A attached hereto:

Covenants, conditions, and restrictions embodied in the declaration recorded June 28, 1974, Book 740628, Official Records, page 77.

Letter H Continued

04/24/2006 13:48 FAX 19163515603 FOLSOM UTILITES DEPT 035/038

SCHEDULE "C"
TO AGREEMENT FOR THE PURCHASE AND SALE
OF CERTAIN ASSETS OF THE CITY OF FOLSOM

LISTING OF LITIGATION, INVESTIGATION, OR ADMINISTRATIVE, ARBITROL, OR OTHER PROCEEDINGS PENDING OR, TO THE KNOWLEDGE OF SELLER, THREATENED AGAINST SELLER WHICH AFFECT OR MAY AFFECT THE PROPERTY, THE SALE OF THE PROPERTY UNDER THIS AGREEMENT, OR ANY OTHER TERMS OF THIS AGREEMENT:

Seller is of the opinion that there are no pending or threatened proceedings, but wishes to disclose to Buyer the existence of a letter dated August 13, 1981, from Robert W. Bell to Mr. James Erickson, the then City Administrator, a copy of which is attached hereto.

04/24/2006 MON 12:43 [TX/RX NO 7596] 035

Letter H Continued

04/24/2006 13:46 FAX 19183515803 FOLSOM UTILITES DEPT 036/038

RECEIVED

AUG 14 1981

LAW OFFICES OF
HEFNER, STARK & MAROIS
FOURTEENTH FLOOR-PLAZA TOWERS
555 CAPITOL MALL
SACRAMENTO, CALIFORNIA 95814

ARCHIE HEFNER, INC.
ROBERT H. STARK
THEODORE H. MAROIS, JR.
JAMES H. WOODSIDE
JOHN D. BESSEY
ROBERT K. BELL
RICHARD K. PARK
KENNETH R. STONE
TIMOTHY D. TARON
JUDY R. CANFOS
MARK K. SHAUFFER
TIMOTHY M. CRONAN
RAY C. THOMPSON
CAROLE W. HOGAN

DOWNEY, BRAND SEYMOUR & ROHWER
HUGH B. BRADFORD (1878-1956)
S. H. CROSS (1884-1934)

AREA CODE 916
TELEPHONE 444-8820

OF COUNSEL
WILLIAM H. GALLAGHER

August 13, 1981

Mr. James Erickson
City Administrator
City of Folsom
15 Natoma Street
Folsom, California 95630

Re: City of Folsom - Water Supply

Dear Mr. Erickson:

This law firm represents Angelo Tsakopoulos and William Cummings. As you are aware, our clients own a considerable number of acres of undeveloped land within the City limits of Folsom. Our clients have asked us to review the staff report that had been prepared by City staff entitled "Future Demands on the Folsom Water System" and to monitor the hearing before the City Council on the issue on July 7, 1981.

Naturally, our clients are quite concerned with the ability of the City of Folsom to serve water to their undeveloped lands in the future in light of the fact that the City has contracted to sell some of its water to the Aerojet General Corporation and is considering the sale of water to the Nimbus Assessment District.

Basically, it is our clients' feeling that the City of Folsom should not jeopardize its future ability to serve lands with water that are already inside the City limits by contracting to provide water to lands that are actually outside the City limits. However, the staff report cited above and discussed at the July 7, 1981 meeting appears to indicate that the City will have enough water from its present entitlement of 22,000 acre feet to cover the anticipated demand of all the undeveloped property within the City limits in the "long run" provided there is a re-negotiation of the City's contract with Aerojet General.

Based on the representations contained in the staff report that was given to the City Council, our clients will not take any action at this time to protect any rights that they may feel they have to water that the City of Folsom may contract to sell outside

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Letter H Continued

04/24/2006 13:46 FAX 19163515603 FOLSOM UTILITES DEPT 037/038

LAW OFFICES OF
HEFNER, STARK & MAROIS

Mr. James Erickson Page Two August 13, 1981

of the City limits, but we would appreciate it if you would write us a letter indicating that the representations contained in the staff report are true and that the City does intend to re-negotiate the contract with Aerojet in accordance with the statements contained in the staff report.

If you have any questions, please feel free to contact us at any time.

Sincerely,

HEFNER, STARK & MAROIS

By
Robert W. Bell

RWB:vv

cc: Angelo Tsakopoulos
William Cummings
Phil Mering
George Basye

04/24/2006 MON 12:43 [TX/RX NO 7596] 037

Letter H Continued

04/24/2006 13:46 FAX 19163515603 FOLSOM UTILITES DEPT 038/038

SCHEDULE "D"
TO AGREEMENT FOR THE PURCHASE AND SALE
OF CERTAIN ASSETS OF THE CITY OF FOLSOM

LIST OF PIPES, VALVES, SERVICE CONNECTIONS, METERS, WELLS, PUMPS, PRESSURE TANKS, AND/OR OTHER WATERWORKS FACILITIES INCLUDED IN THE PROPERTY NOT IN WORKING ORDER TO AT LEAST THE SAME EXTENT AS ON FEBRUARY 23, 1982, WHEN PORTIONS OF SUCH FACILITIES WERE INSPECTED BY BUYER'S REPRESENTATIVE:

NONE

04/24/2006 MON 12:43 [TX/RX NO 7596] 038

Letter H Continued

EXHIBIT 2

Letter H Continued

04/24/2006 13:19 FAX 19163515603 FOLSOM UTILITES DEPT 002/008

AGREEMENT

This Agreement is made and entered into as of March 11, 1982, by and between the CITY OF FOLSOM, a California municipal corporation ("City") and NATOMAS REAL ESTATE COMPANY, a California corporation ("Natomas").

RECITALS

1. Natomas is the developer of a 936-acre development in an unincorporated area of Sacramento County, known as Gold River.

2. Gold River is currently within the City's service territory. The City has expended monies and incurred certain general bonded indebtedness for the delivery of potable water supplies to Gold River and other adjacent properties.

3. Natomas desires that water service to Gold River be provided by Southern California Water Company ("SCWC"), which has water supply and transmission facilities capable of providing such service in the near future.

NOW, THEREFORE, for and in consideration of the mutual promises and agreements herein contained and for other good, valuable and adequate consideration, City and Natomas agree as follows:

510 20-282-1A
Res 1528, 1529 3-2-82

04/24/2006 MON 12:20 [TX/RX NO 7594] 002

Letter H Continued

04/24/2006 13:19 FAX 19189515803 FOLSOM UTILITES DEPT 003/008

SECTION 1.

City shall reach agreement with SCWC for sale of its water service facilties to SCWC and shall consent to the extension of SCWC's service area to include an area in an unincorporated portion of Sacramento County which has a northern boundary which runs along the American River, a western boundary which runs along Citrus Road and Sunrise Boulevard and an irregular boundary to the south and west which generally runs along the Folsom South Canal, but excluding Parcel No. 72-23-14 consisting of approximately 11.38 acres located north of the Folsom South Canal. City will cooperate fully in requesting such extension of SCWC's service area from the California Public Utilities Commission, and shall take such further action with respect thereto as may be requested by SCWC.

SECTION 2.

Subject to the conditions identified in paragraph 3, Natomas shall pay to City, at the times specified, by certified check or cashier's check, the following amounts:

(a) Five Hundred Thousand Dollars ($500,000.00) upon final approval, whether by affirmative action or inaction in response to the filing of an advice letter, by the California Public Utilities Commission of the extension of SCWC's service area to include Gold River;

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04/24/2006 MON 12:20 [TX/RX NO 7594] 003

Letter H Continued

04/24/2006 13:19 FAX 19183515603 FOLSOM UTILITES DEPT 004/008

(b) Two Hundred Fifty Thousand Dollars ($250,000.00) on the first anniversary of the approval described in subparagraph (a) above; and

(c) One Hundred Thirty-five Thousand Dollars ($135,000.00) on the second anniversary of the approval described in subparagraph (a) above.

SECTION 3.

The obligation of Natomas to make the payments described in section 2 hereof are subject to fulfillment of each of the following conditions:

(a) City shall, concurrent with the execution of this Agreement, have entered into that certain Agreement For the Purchase and Sale of Certain Assets of the City of Folsom, in which City shall have agreed to consent to the extension of SCWC's service area;

(b) Natomas and SCWC shall, concurrent with the execution of this Agremeent, have entered into a mutually satisfactory agreement pursuant to SCWC's filed Rule 15 C.l.c., providing for the reimbursement to Natomas of the actual costs of water delivery facilities installed in Gold River Units 1A and 1B;

(c) The execution, delivery and performance of this Agreement shall have been duly authorized by the City Council of the City of Folsom;.

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Letter H Continued

(d) The California Public Utilities Commission shall have granted, by affirmative action or by inaction in response to the filing of an advice letter, SCWC's request to extend its service area to include Gold River.

SECTION 4.

Nothing in this Agreement requires, or is intended to require, the transfer, sale or relinquishment of water or water rights by City to Natomas, SCWC or any other person or entity.

SECTION 5.

Except as may otherwise be expressly provided herein, City and Natomas shall pay their respective costs and expenses in preparing and performing this Agreement and the transactions contemplated thereby.

SECTION 6.

All notices, requests, demands or other communications hereunder shall be in writing and shall be deemed to have been duly given if delivered or mailed, first class registered mail, postage prepaid: (a) if to City, to Steven E. Speights, City Administrator, City of Folsom, 50 Natoma Street, Folsom, California 95630 (or at such other address as City may have furnished to Buyer in writing), with a copy to James Day, Esq., Downey, Brand, Seymour & Rohwer,

Letter H Continued

04/24/2006 13:19 FAX 19163515603 FOLSOM UTILITES DEPT 006/008

555 Capitol Mall, Suite 1050, Sacramento, California 95814, and (b) if to Natomas to Mr. Thomas J. Baker, President, Natomas Real Estate Company, 3040 Explorer Drive, Sacramento, California 95827 (or such other address as Natomas may have furnished to City in writing), with a copy to William G. Holliman, Esq., McDonough, Holland & Allen, 555 Capitol Mall, Suite 950, Sacramento, California 95814.

SECTION 7.

This Agreement may be executed simultaneously in one or more counterparts, each of which shall be deemed to be an original, but all of which together shall constitute one and the same instrument.

SECTION 8.

This Agrement is not assignable by either party, and the covenants, conditions and provisions hereof are and shall be for the exclusive and sole benefit of the parties hereto, and nothing herein, expressed or implied, is intended or shall be construed to confer upon or to give any person or corporation other than the parties hereto any right, remedy or claim, legal or equitable, under or by reason of this Agreement.

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Letter H Continued

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SECTION 9.

This Agreement shall terminate at the option of either party if not performed on or before April 15, 1982. Each of the parties hereto agrees to exercise its best efforts to complete and close the transactions contemplated hereby as soon as possible and, in any event, prior to such date.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement or caused this Agreement to be executed in their respective corporate names, by their respective officers thereunto duly authorized and their respective corporate seals to be hereunto affixed and duly attested as of the day and year first above written.

CITY OF FOLSOM,
a California municipal corporation

By _____
Mayor

By _____
City Clerk

(SEAL)

NATOMAS REAL ESTATE COMPANY,
a California corporation

By _____
Thomas J. Baker, President

(SEAL)

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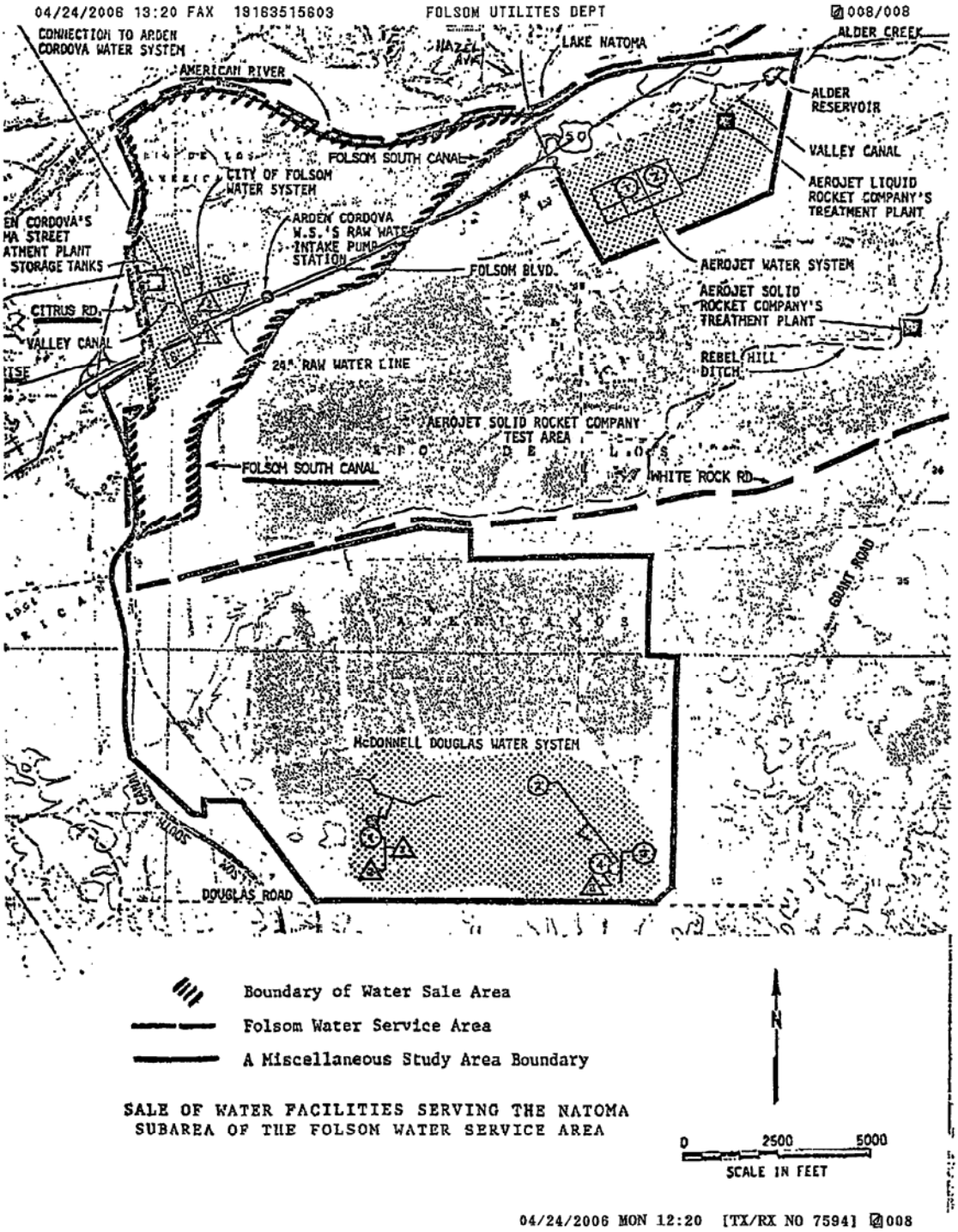
04/24/2006 MON 12:20 [TX/RX NO 7594] 007

Letter H Continued



SALE OF WATER FACILITIES SERVING THE NATOMA SUBAREA OF THE FOLSOM WATER SERVICE AREA

Letter H Kenneth Payne, City of Folsom Utilities Department

Response H-1: The commenter's specific concerns regarding the Water Supply Evaluation for the City of Rancho Cordova General Plan are responded to in Response to Comments H-2 through H-6. As noted in the Water Supply Evaluation for the City of Rancho Cordova General Plan, the purpose of the analysis is to provide the City information regarding projected water demands of the proposed General Plan for buildout conditions (currently projected to occur by approximately year 2050) and existing and future water supplies planned to be available to serve this growth. Thus, this document is a water supply analysis disclosure document and does not establish any regulations or policy by the City regarding the provision of water supply in the Planning Area for the City of Rancho Cordova General Plan (which includes the Aerojet, Westborough and Glenborough planning areas). It should also be noted that the City does not currently provide water supply services or has any proposed plans at this time to do so. Thus, the provision and expansion of water supply for future development of the City is expected to continue to be provided by public and private service providers. The City and Sacramento County Water Agency (primary water service provider for the overall Planning Area) have determined that the Water Supply Evaluation for the City of Rancho Cordova General Plan is an accurate description of water supply available for General Plan growth (see Comment Letter I and M).

Response H-2: The Draft EIR and Water Supply Evaluation for the City of Rancho Cordova General Plan specifically acknowledge that Aerojet lands area within the service area of the City of Folsom (Draft EIR Figure 4.9-3). The commenter is correct that the Water Supply Evaluation for the City of Rancho Cordova General Plan does not reflect the circumstance of the City of Folsom providing water supply to the Westborough, Glenborough or Aerojet planning areas (no water supply from the City of Folsom was assumed in the analysis). The consideration of City of Folsom water service results in the potential of more water supply available for development in the planning areas outside of the City's current boundaries than what is currently assumed available in the Water Supply Evaluation for the City of Rancho Cordova General Plan.

Response H-3: Government Code Section 65300 (associated with the development of general plans) specifically calls for the development of a long-term general plan for the physical development of the City and any land outside its boundaries that the City's judgment bears relation to its planning, which the City has compiled with through the development of the proposed General Plan. Proposed land uses set forth in the proposed General Plan are generally consistent with the proposed development requests that have been submitted to Sacramento County and the City of Rancho Cordova (a majority of the Westborough Planning Area is located within the City limits). The commenter is referred to Response to Comment H-1.

Response H-4: Both the Draft EIR and Water Supply Evaluation for the City of Rancho Cordova General Plan identify the replacement water sources (Draft EIR pages 4.9-17, -19 and –22, Water Supply Evaluation pages 27, 32 through 34). Reliability of these sources of replacement water (which are considered to have a high reliability) are addressed on Draft EIR pages 4.9-14 through –17 as well as Water Supply Evaluation page 36. The commenter provides no evidence to suggest that these replacement water supply sources have questionable reliability. The Water Supply Evaluation for the City of Rancho Cordova General Plan estimated water demand of the General Plan at full buildout, which incorporated land uses associated with the Glenborough and Aerojet planning areas (Water Supply Evaluation page 41) and compared buildout water demands with total water supplies expected to be available (Water Supply Evaluation Table 1). As noted in Response to Comment H-2, water supply from the City of Folsom was not considered in the analysis.

Response H-5: As noted in the Response to Comment H-2, the Draft EIR and Water Supply Evaluation for the City of Rancho Cordova General Plan specifically acknowledge that Aerojet lands area within the service area of the City of Folsom. The commenter is correct that the Water Supply Evaluation for the City of Rancho Cordova General Plan does not reflect the circumstance of the City of Folsom providing water supply to the Westborough, Glenborough or Aerojet planning areas. The following text changes are made to the Draft EIR:

- Draft EIR pages 4.9-45 and –46, the following text changes are made:

  "As noted in **Table 4.9-7**, adequate water supplies would likely be available to serve buildout of the City within its current corporate limits. Beyond buildout of its corporate limits, new development projects would be served by SCWA (no other purveyors are located outside the City's corporate limits) on a first-come, first-served basis. While total supplies available (i.e., 77,620 afy) are greater than the City's corporate limit demands (i.e., 57,299 afy), indicating that additional growth beyond its corporate limits may be accommodated, the exact amount of water and corresponding land areas that could be served are currently unknown because SCWA would need to consider requests for service in the context of all water demands throughout the Zone 40 service area. The City may be able to pursue additional growth beyond its corporate limits; however, the City would need to coordinate with SCWA <u>and the City of Folsom (service of Aerojet lands within Folsom's service area)</u> to determine the total demands that could be met by existing and projected future water supplies. Future urbanization of the Planning Area would also increase impervious surfaces near areas determined to have groundwater recharge capability (e.g., near the Cosumnes River)."

  If water supplies are not available to meet buildout water demands, the City would either need to stop approving new growth within its jurisdiction, or collaborate with regional water purveyors to investigate potential future water supply options in the context of the regional

> water supply planning environment. Investigation of future water supply options would likely require involvement from local water purveyors (GSWC, Cal-Am, City of Folsom, and SCWA at a minimum, and other neighboring purveyors as appropriate), the Water Forum successor effort, and environmental groups. Because of the long-term and sometimes contentious nature of future water supply planning, the feasibility of implementing new water supply options beyond those described in the WFA are unknown. The following section provides a brief summary of potential new water supply options the City could pursue (in collaboration with local agencies) to develop supplies to meet its planning area buildout water demands."

The commenter is referred to Response to Comment H-1 and H-4 regarding comments associated with the reliability of replacement water and the City's position regarding water service providers. However, it should be noted that the Draft EIR and the Water Supply Evaluation for the City of Rancho Cordova General Plan acknowledge that there is currently a shortfall in existing and planned water supply sources to meet full General Plan buildout conditions.

Response H-6: The commenter misinterprets the conclusions of the Draft EIR and Water Supply Evaluation for the City of Rancho Cordova General Plan. These reports document available water sources and their reliability to serve full buildout of the General Plan; however, both reports specifically note that the total available water supply is not adequate to serve full buildout (Draft EIR Table 4.9-7 and Water Supply Evaluation Table 1). Both reports also describe the reliability of these water supplies during dry years and provides a description of how the use of certain water sources would shift (Draft EIR pages 4.9-14 through –19). As noted in Response to Comment H-2, utilization of City of Folsom water supply was not assumed in this analysis. Sacramento County Water Agency (the primary water service provider to the City and the likely agency to serve most of the City's new growth) is also a signatory to the Water Forum and has developed its long-term water supply planning (e.g., Zone 40 Water Supply Master Plan) consistent with the Water Forum.

Letter I

Department of Water Resources
Keith DeVore, Director

Including service to the cities of
Elk Grove and Rancho Cordova

SACRAMENTO COUNTY
WATER AGENCY

May 15, 2006

Patrick Angell

City of Rancho Cordova Planning Department

2729 Prospect Park Drive

Rancho Cordova, CA 95670

RE: **The City of Rancho Cordova General Plan Draft Environmental Impact Report**

Dear Mr. Angell:

Thank you for the opportunity to comment on the City of Rancho Cordova ("City") General Plan Draft Environmental Impact Report ("DEIR"). Much of the General Plan area lies in Sacramento County Water Agency ("SCWA") Zones 40 and 41; SCWA constructs, operates and maintains a public water supply system in these Zones. Other water purveyors in the City include the Golden State Water Company and the California-American Water Company.

We concur with the conclusion of the General Plan that sources of water supply sufficient to meet the build-out demand of the City Corporate Limits ((including those sources described in the 2005 Zone 40 Water Supply Master Plan to meet its 2030 Study Area demands) have been identified. We also agree that sources of supply to meet build-out water demand of the Planning Area have yet to be determined, but that regional water planning that includes water transfers will likely be important factors in addressing this issue. I-1

Regarding specific sections of the General Plan DEIR document, we have the following comments:

Note: Throughout the document, the use of Zone 40 Central Water Treatment Plant should be replaced with Vineyard Water Treatment Plant (as shown in Note 2 in the General Plan DEIR Section 4.12, Public Services and Utilities, comments section found in this letter.) I-2

General Plan DEIR Appendix 4.9, Rancho Cordova Water Supply Evaluation, EDAW, March 8, 2006

1. Bottom of p.1: Executive Summary does not fully describe Cal-Am's service area (they forget to mention Suburban and Rosemont). Also, SCWA **plans** to wholesale water to Cal-Am, but the agreement has not been negotiated at this time. This would also affect section 4.12.3. I-3
2. Middle of p.10, Sacramento County Local Agency Formation Commission: This description is incomplete and should have the following added, "**Annexations to SCWA are not subject to LaFCo.**" I-4

"Managing Tomorrow's Water Today"

Main: 827 7th St., Rm. 301, Sacramento, CA 95814 • (916) 874-6851 • fax (916) 874-8693 • www.scwa.net
Facilities Operations & Admin.: 3847 Branch Center Rd. #1, Sacramento, CA 95827 • (916) 875-RAIN • fax (916) 875-6884
Elk Grove Office: 9280 W. Stockton Blvd., Suite 220, Elk Grove, CA 95758 • (916) 875-RAIN • fax (916) 875-4046

Letter I Continued

3. Exhibits 3 & 4 (pp.12 & 13, respectively) are redundant, yet they don't accurately describe the service boundaries of the purveyors. SCWA recommends replacing Exhibits 3 & 4 with Exhibit 7 from the Rio Del Oro Specific Plan Project's Amended Water Supply Assessment (EDAW, May 2006). I-5

4. Sections 3.3.1 thru 3.3.4 are incorrect and should be replaced with information found in Chapter 4 of the Rio Del Oro Specific Plan Project's Amended Water Supply Assessment (EDAW, May 2006). The RDO AWSA does not mention the North Vineyard Well Field (formerly Excelsior Road Well Field) Project, so we have included comments on that part of Section 3.3.2 specifically: Second sentence should end with: "...with a 30-inch raw-water pipeline to convey water to **the Anatolia Water Treatment Plant**." The next sentence should read, "The first phase consists of three wells (4,500 gallons per minute [gpm]) and **will** be expanded as new development or replacement supplies are needed." Finally, the second to last sentence should read, "The initial phase **of the project is operational**." I-6

5. Middle of p.31, Section 4.1.3, second paragraph reads, "With implementation of the Zone 40 WSMP, Zone 41 UWMP, **and Zone 41 WSIP, and the NSA WSIP**, Zone 40's NSA service area would be served with reliable, long-term water supplies." SCWA recommends changing the text to read, "With implementation of the Zone 40 WSMP, Zone 41 UWMP, **and Zone 40 WSIP**; Zone 40's NSA service area would be served with reliable, long-term water supplies." Please replace all references to the NSA WSIP, Zone 41 WSIP and Zone 41 NSA WSIP, made throughout document, with **Zone 40 WSIP**. I-7

6. Middle of p.34, Second to last paragraph in Groundwater discussion, first sentence should read, "Groundwater lost as a result of contamination would be replaced by **SCWA under terms of the Aerojet/Boeing agreement**." I-8

7. Bottom of p.38, Table 10: SCWA does not wholesale water to Cal-Am's "Parkway" area. I-9

8. Bottom of p.39, Section 4.3.3, first sentence in the last paragraph should end with, "...local contamination problem associated with past operations at Aerojet **and the former Mather Air Force Base**." I-10

9. Bottom of p.43, Table 12: Note 5 should say, "**SCWA will wholesale remediated groundwater to GSWC** to serve this project." I-11

10. Bottom of p.44, Section 5.2.1, the fourth and fifth sentences in the third paragraph should read, "SCWA has agreed to serve the SRSP area with groundwater from the NVWF, **the first phase of which is operational**. ~~(see Section 3.3.2, "SCWA Zone 40 Water Supply Master Plan.") SCWA has adopted resolution (Resolution No. WA-0607 on July 26, 2005) that specifically allocates water supplies from the NVWF to the SRSP project (Appendix A).~~" I-12

11. Top of p.45, sentence continued from p. 44: the total anticipated maximum day capacity of the NVWF is approximately **12,000gpm** not 8,000gpm. I-13

12. Middle of p.49, Section 5.4.3, the first sentence in the third paragraph should read, "The **Demonstration** Water Recycling Program...was designed and constructed to be **readily** expandable to 10 mgd..." SRCSD's program is only a demonstration program in the City of Elk Grove at this point. The document should reflect this in all areas that reference the "Water Recycling Program". I-14

13. Middle of p.50, Section 6, the third sentence in the third paragraph seems to be written incorrectly. The document finds that there **is** sufficient water to meet the City's 2030 (corporate limits) land use demands, but there are insufficient water supplies to meet the 2050 Planning area. I-15

Letter I Continued

General Plan DEIR Section 4.9, Hydrology and Water Quality

1. Bottom of p.4.9-45, second sentence should mention that other purveyors could serve water outside of the city's corporate limits, "...would be served by SCWA **and other purveyors**." I-16
2. Middle of p.4.9-46, Water Transfers and Exchanges with Nearby Purveyors. This section should not detail how SCWA will acquire water through transfers with other purveyors in the area. SCWA has not been involved in any discussions on this topic. This section should be more general and not reference SCWA specifically. *City of Folsom* information is incorrect. This would affect Section 5.4 in Appendix 4.9. I-17
3. Bottom of p.4.9-48, Expand Use of Recycled Water. The first sentence in the second paragraph should reference the "Water Recycling Program" as a "**Demonstration** Water Recycling Program". This change should be made throughout the document. The second sentence in the second paragraph should end with, "...**portions of the City of Elk Grove.**", instead of "...Zone 40." The second to last sentence in the second paragraph should read, "SRCSD's boundary covers **most of** the Planning Area." I-18
4. Top of p.4.9-49, Expand Use of Recycled Water. The second paragraph references the Water Recycling Program, please change to **Demonstration Water Recycling Program**. First paragraph, second sentence should end with, "...**and the City of Elk Grove.**" Next sentence should read, "SRCSD will work in partnership with SCWA to serve **those areas that are within Zone 40**." I-19
5. Bottom of p.4.9-53, *Action NR.5.2.2*, "Coordinate with the City's water purveyors **and the SRCSD** to establish a connected "purple pipe" system throughout the City's new development areas that use recycled water." Please add SRCSD to all language where discussion is made about coordination between water purveyors and the City regarding Recycled Water. I-20

General Plan DEIR Section 4.12, Public Services and Utilities

1. Bottom of p.4.12-25, Water Supply Infrastructure, first paragraph should read, "The existing water system in the Planning Area consists of **water supply** facilities, including..., **interties**, and treatment facilities. I-21
2. P. 4.12-26, Zone 40 Water Supply Infrastructure Plan (WSIP), first paragraph, first sentence should read, "...SCWA **has developed a** steering document, **known as the WSIP,** to ensure reliable long-term water supplies and adequate water supply infrastructure for its present and future customers ~~in the Sunrise Corridor/Mather/Sunrise Douglas Service areas~~." Second paragraph, the first and second sentences should be deleted from the document and the next sentence, beginning with "Individual water studies...," should be added to the first paragraph.

   Fourth paragraph, beginning with "Existing Zone 40 water facilities...," should be deleted.

   The discussions on the ~~Zone 40 Central~~ **Vineyard** Water Treatment Plant, Freeport Regional Water Project (FRWP), North Vineyard Well Field Project and Eastern County Replacement Water Supply Project need to be replaced with information found in Chapter 4 of the Rio Del Oro Specific Plan Project's Amended Water Supply Assessment (EDAW, May 2006). The RDO AWSA does not mention the North Vineyard Well Field (formerly Excelsior Road Well Field) Project, so we have included comments on that part of Section 3.3.2 specifically: Second sentence should end with: "...with a 30-inch raw-water pipeline to convey water to **the Anatolia Water Treatment Plant**." The next sentence should read, "The first phase consists of three wells (4,500 gallons per minute [gpm]) and **will** be expanded as new development or replacement supplies are needed." Finally, the second to last sentence should read, "The initial phase **of the project is operational**." I-22

Letter I Continued

3. Middle of p.4.12-29, third paragraph beginning with "The recycled water facility component consists of pipelines..." should be deleted. I-23

4. Middle of p.4.12-29, fourth paragraph incorrectly identifies SCWA's Zone 40 Water Supply Master Plan as having considered recycled water use outside of the City of Elk Grove. The EIR prepared for this document only identified using 4,400 Ac-ft of recycled water within Zone 40 (all of it used in the City of Elk Grove.) In fact, SCWA does not think that any of these environmental documents have taken an in-depth look at recycled water in Rancho Cordova and should therefore be excluded in this discussion. I-24

In addition to these comments, SCWA has identified a number of minor, partially-true statements that are not significant or relevant to report on by SCWA staff. SCWA recommends that these inconsistencies be reviewed by City staff in a meeting with all purveyors to ensure accuracy. I-25

Please call me should you wish to discuss. Thank you.

Very truly yours,

Daniel Jones
Assistant Engineer
(916) 874-6084
jonesd@saccounty.net

Letter I Daniel Jones, Sacramento County Water Agency

Response I-1: Comment noted. The Water Supply Evaluation for the City of Rancho Cordova General Plan was developed with specific input from SCWA and other area water service providers.

Response I-2: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document. The following edits are made to the Draft EIR:

- Draft EIR page 4.9-20, the first bulleted item is revised as follows:

  "~~Zone 40 Central Water Treatment Plant~~ Vineyard Water Treatment Plant – SCWA plans to construct the 78-acre Vineyard Water Treatment Plant ~~Central Water Treatment Plant~~ (~~C~~VWTP) and associated water supply facilities to provide up to 85 million gallons per day (mgd) of potable water to existing and approved urban development within the SCWA Zone 40 area. The ~~C~~VWTP site is located at the northeast corner of Florin and Knox Roads, west of the Florin Road/Excelsior Road intersection in Sacramento County. An associated SCWA corporation yard to house facilities and store equipment would be colocated on the site, along with a groundwater treatment facility. The ~~C~~VWTP would have the capacity to treat 85 mgd of raw surface water and 13 mgd of raw groundwater to serve approved land uses in the Zone 40 service area. Initial phases of facility construction are anticipated to be completed by 2010 with full buildout by 2019."

Response I-3: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-4: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-5: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-6: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-7: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-8: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-9: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-10: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-11: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-12: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-13: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-14: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-15: Comment noted. SCWA requested edits to the Water Supply Evaluation for the City of Rancho Cordova General Plan are provided in **Appendix A** of this document.

Response I-16: Comment noted. The following text changes are made to the Draft EIR:

- Draft EIR page 4.9-45, the following changes are made to the second sentence:

  "Beyond buildout of its corporate limits, new development projects would be served by SCWA and other purveyors ~~(no other purveyors are located outside the City's corporate limits)~~ on a first-come, first-served basis."

Response I-17: Comment noted. As noted on Draft EIR page 4.9-46, the optional water supplies identified are considered preliminary and have not been developed in any substantive detail. It is unclear what information regarding the City of Folsom is incorrect and no additional detail was provided by the commenter on this issue. The following edits are made to the Draft EIR:

- Draft EIR pages 4.9-46, the following text changes are made to the third through fourth paragraphs:

  "WATER TRANSFERS AND EXCHANGES WITH NEARBY PURVEYORS

  The water purveyors in the Planning Area (e.g., SCWA, GSWC, Cal-Am) could enter into agreements with nearby cities and agencies to

secure new or surplus water supplies. Cities and agencies who purchase water from SCWA or have jurisdictional boundaries that overlap the Planning Area ~~Zone 40's boundaries~~ would be a likely choice for developing such an agreement because the ability to develop distribution system interties. The interties would allow the easy transfer and exchange of water supplies between neighboring water purveyors without the need to construct substantial new conveyance infrastructure. The potential feasibility of water purveyors located near Rancho Cordova providing new water supplies to the City are discussed below.

City of Folsom

GSWC has entered into an agreement with the City of Folsom to transfer 5,000 afy to the City of Folsom pursuant to its agreement for replacement water supplies with Aerojet. Within the agreement there is the option for the City of Folsom to transfer the 5,000 afy to the SCWA for its use within its conjunctive use water supply system. However, based in indications from the City of Folsom, the City does not anticipate the transfer of these supplies ~~to SCWA would be likely~~.

Placer County Water Agency

Placer County Water Agency was contacted to determine whether they had any available water supplies that could be exchanged or transferred to water service providers in the Planning Area ~~SCWA~~. Staff at Placer County Water Agency indicated that based on their Integrated Water Resources Plan, which is currently under preparation and was not available for review at the time the Water Supply Evaluation was…"

- Draft EIR page 4.9-47, the following text change is made to the first full paragraph:

  "GSWC currently has an intertie with Sacramento Suburban Water District (SSWD)'s water distribution system. As of the date of the Water Supply Evaluation, no reply has been received from SSWD regarding the potential availability of water transfer or exchange opportunities. The potential may exist for the acquisition of additional supplies to meet City demands; however, the City would need to coordinate with GSWC and SSWD to determine the feasibility of those supplies. If supplies are available, no substantial new infrastructure would need to be constructed because an intertie connection between these two agencies is already available. Additional distribution and treatment facilities may be required to convey the water from GSWC existing distribution to new growth areas to deliver these supplies ~~to SCWA~~ for distribution in the new growth areas. "

Response I-18: Comment noted. The following text changes are made to the Draft EIR:

- Draft EIR page 4.9-48, the following changes are made to the second paragraph under "Expanded Use of Recycled Water":

  "Through an agreement between SCWA and SRCSD, the SRCSD has successfully implemented a 5 mgd (5,600 afy) demonstration water recycling program. This program provides recycled water for SRCSD on-site uses and for large commercial irrigation customers within ~~Zone~~ the City of Elk Grove ~~40~~ (e.g., commercial, industrial, right-of-way landscaping, schools, and parks). Recycled water is a desirable source of water for outdoor landscape irrigation and other non-potable uses because of its high reliability and its independence of hydrologic conditions in any given year. By increasing the use of recycled water SRCSD may be able to reduce the amount of treated wastewater discharged to the river which may become a more cost effective solution for the SRCSD's 1.1 million ratepayers as wastewater regulations require ever higher treatment standards (and costs) for discharged effluent. SRCSD's boundary covers most of the ~~the Zone 40 region in the~~ Planning Area. It is expected that the SRCSD's boundary will be expanded further to cover the areas in the Planning Area that are currently undeveloped as development plans are approved."

Response I-19: Comment noted. The following text changes are made to the Draft EIR:

- Draft EIR page 4.9-49, the following changes are made to the first full paragraph:

  "The Demonstration Water Recycling Program on the Sacramento Regional Water Treatment Plant site was designed and constructed to be readily expandable to 10 mgd (11,200 afy) in accordance with SRCSD's Master Reclamation Permit (WDR #97- 146). A planned Water Recycling Facility plant expansion from 5 mgd to 10 mgd could serve new areas of planned and expected growth and public open space and golf course areas within the City of Elk Grove ~~Sacramento~~. SRCSD will work in partnership with SCWA to serve those areas that are within ~~these~~ Zone 40 ~~areas~~. The expanded water recycling facility and new water recycling service areas will be called Phase II of the SRCSD Water Recycling Program. Phase II construction will be timed with the need for the higher capacity and is currently expected to be in service by 2008- 2010."

Response I-20: The commenter's statements and input regarding General Plan NR.5.2.2 are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response I-21: Comment noted. The following text changes are made to the Draft EIR:

- Draft EIR page 4.12-25, the following changes are made to the last paragraph:

"The existing water supply system in the Planning Area consists of Zone 40 facilities, including various raw and treated water transmission lines, distribution mains, pump stations, inertias, and treatment facilities. The following is an overview of water supply infrastructure in the Planning Area by service provider."

Response I-22: Comment noted. The following text changes are made to the Draft EIR:

- Draft EIR page 4.12-26, the following changes are made to this page:

"In order to achieve the objectives of the Zone 40 Water Supply Master Plan, SCWA has developed ~~requires~~ a steering document, known as the WSIP, to ensure reliable long-term water supplies and adequate water supply infrastructure for its present and future customers ~~in the Sunrise Corridor/Mather/Sunrise Douglas Service areas~~. The objectives of the Water Supply Infrastructure Plan (WSIP) are to provide a comprehensive evaluation of SCWA's water supplies, and to identify the likely alternative of water diversion(s), treatment, and conveyance facilities to efficiently make use of SCWA's water entitlements. Individual water studies require approval by SCWA and may include development specific conditions including requirements for reservation of land for larger water facilities and phasing of water facilities to accommodate logical growth patterns.

~~As a part of the master plan process, SCWA initiated the Zone 40 WSIP. This WSIP is a small piece of a larger strategic plan for conjunctive use of surface water and groundwater as set forth in the Master Plan document. This WSIP was integrated with a larger WSIP that included the entire Master Plan area. Smaller distribution facilities have not been included in the WSIP, but were evaluated and documented in water studies developed for specific projects. Individual water studies require approval by SCWA and may include development specific conditions including requirements for reservation of land for larger water facilities and phasing of water facilities to accommodate logical growth patterns.~~

~~Existing Zone 40 water facilities include a transmission, distribution, and storage system with approximately 35 million gallons per day (mgd) of groundwater production facilities. Zone 40 has also purchased 11 mgd of nondedicated surface water capacity from the City of Sacramento's Sacramento River Water Treatment Plant. Additional facilities will be required for production, treatment, storage, and conveyance of water supplies to Zone 40 in accordance with the proposed 2002 Zone 40 WSMP.~~

Vineyard ~~Zone 40 Central~~ Water Treatment Plant. SCWA is proposing to ~~plans to~~ construct the Vineyard ~~78-acre~~ ~~Central~~ Water Treatment Plant (VWTP~~CWTP~~) and associated water supply facilities to provide up to 100 ~~85~~ million gallons per day (mgd) of potable water to existing and approved urban development within the SCWA Zone 40 area. The VWTP ~~CWTP~~ site is located west of the intersection of Florin and Excelsior roads, at the northeast corner of Florin and Knox Roads, west

of the Florin Road/Excelsior Road intersection in Sacramento County. ~~An associated SCWA corporation yard to house facilities and store equipment would be collocated on the site, along with a groundwater treatment facility.~~ The VWTP ~~CWTP~~ would have the capacity to treat 100 ~~85~~ mgd of raw surface water and remediated ~~13 mgd of raw~~ groundwater to serve approved land uses in the Zone 40 service area. Initial phases of facility construction are anticipated to be completed by 2010 with full buildout by 2029~~2019~~.

Freeport Regional Water Project (FRWP). SCWA and East Bay Municipal Utility District are constructing a diversion structure on the Sacramento River near the community of Freeport and a raw-water conveyance pipeline from the diversion structure to the central portion of Zone 40. As discussed above, SCWA would construct a 100~~85~~-mgd surface-water treatment facility in the central portion of Zone 40 (VWTP~~CWTP~~), and the associated treated-water conveyance pipelines to deliver water to SCWA customers. This project is anticipated to be completed by 2010."

- Draft EIR page 4.12-27, the following changes are made to the first and second paragraph:

  "**…**water supplies to serve existing or proposed development within Zone 40. Ultimately it would consist of up to eight wells located near Excelsior Road and Florin Road with a 30-inch raw-water pipeline to convey water to the ~~a new water treatment plant (~~Anatolia Water Treatment Plant~~)~~ located near the southeast corner of the intersection of Sunrise Boulevard and Douglas Road in the Sun Ridge Specific Plan area). The first phase consists of three wells (4,500 gallons per minute [gpm]) and will ~~would~~ be expanded as new development or replacement supplies are needed. If wells within SCWA's Mather/Sunrise system (in the south west portion of the Planning Area) are shut down because of past groundwater contamination, any additional capacity remaining in the well field can be claimed as a replacement supply (as opposed to a new water supply) by SCWA. This project is currently being constructed, with the initial phase of this project is operational ~~estimated to be complete at the end of 2006~~. The project is expected to be built out by 2011. Water from this project has been allocated to the approved Sun Ridge Specific Plan area within the City and is also anticipated to be the initial water source for the proposed The Preserve at Sunridge project immediately south of the Sun Ridge Specific Plan area (see Appendix 4.9).

  Eastern County Replacement Water Supply Project. The Eastern County Replacement Water Supply Project (RWSP) is a proposal by SCWA to use remediated groundwater obtained through the agreements between the County, SCWA, GenCorp and McDonnell Douglas Corporation/Boeing for replacement of water lost as a result of past activities resulting in groundwater contamination in the Rancho Cordova area, for new development on Aerojet lands, and for environmental enhancement. SCWA has initiated environmental

review of this project, which evaluates several discharge, diversion and treatment options for use remediated groundwater from GenCorp and McDonnell Douglas Corporation/Boeing groundwater extraction and treatment (GET) facilities. The RWSP would identify the necessary facilities and timing of delivery of remediated water. Environmental review is anticipated to be completed by late summer 2006, with construction of all project-related facilities completed by year 2010. The RSWP water would be conveyed through the VWTP. ~~This project is a proposal by SCWA to use remediated groundwater supplies obtained through the agreements between the County, SCWA, Aerojet, and McDonnell Douglas Corporation for replacement water lost as a result of past groundwater contamination in the Sunrise corridor area. The remediated groundwater would replace lost groundwater supplies of Cal-Am or GSWC or would be used to serve new urban development on lands known as Aerojet lands in the northern portion of Zone 40 and for enhanced fishery flows along the Cosumnes River. This project currently is under environmental review and facilities included within this project are anticipated to be constructed by 2010.~~

Response I-23: Comment noted. The following text changes are made to the Draft EIR:

- Draft EIR page 4.12-29, the following changes are made to the third paragraph:

  "~~The recycled water facility component consists of pipelines, storage, and pumping capacity to deliver recycled water to customers within Zone 40. The recycled water component requires a distribution system separate from Zone 40's potable water system. Phase I of this system is complete and operational. Phase II is currently underway and consists of additional transmission pipelines, storage capacity, booster pumps, and localized distribution systems. As noted below, General Plan policy supports the use of recycled water and further expansion of recycled water infrastructure would be required.~~ "

Response I-24: The fourth paragraph makes no mention of recycled water regarding the Zone 40 Water Supply Master Plan or its EIR regarding further expansion of recycled water use beyond the City of Elk Grove. No edits to this paragraph are recommended.

Response I-25: The City has been in contact with all area water service providers regarding the General Plan and its EIR and will continue to coordinate water supply planning. The Water Supply Evaluation for the City of Rancho Cordova General Plan has been revised pursuant to SCWA comments and is provided in **Appendix A** of this document.

Letter J

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

Larry Greene
AIR POLLUTION CONTROL OFFICER

May 15, 2006

Mr. Pat Angell
Environmental Manager
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova CA 95670

RE: Rancho Cordova General Plan Draft EIR

Dear Mr. Angell:

Thank you for the opportunity to comment on the Draft EIR for the City of Rancho Cordova General Plan. We appreciate the time you and other City staff have spent in working with the SMAQMD staff during the process of developing the General Plan. We are pleased to see many of our previously discussed recommendations included in the draft document. Most importantly, we are very heartened to see a separate Air Quality Element as part of your General Plan development efforts. Additional staff comments are as follows: J-1

To the extent that the ability of the region to meet air quality goals and avoid the loss of transportation funding is dependent on the cooperation from local jurisdictions to develop General Plan policies and action items to facilitate that effort, we would encourage a more prospective look at the policies and action items that are outlined for Impact 4.6.1 with the goal of a greater effort to address and mitigate the discrepancy between the proposed General Plan buildout projections and those used in SACOG's Preferred Blueprint Scenario which the SMAQMD is using to update the Attainment Plan. Further, any updates of the Attainment Plan over the life of the General Plan should be taken into account as future buildout takes place that may be in conflict. This is especially important for areas currently outside the city limits of Rancho Cordova where this General Plan will likely offer guidance to any future development that may be approved in those areas. J-2

Thank you for your consideration of these comments. If you have any questions, please contact me at (916) 874-4883 or cmcghee@airquality.org.

Sincerely,

Charlene McGhee
Associate Air Quality Analyst

c: Larry Robinson, Sacramento Metropolitan AQMD

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777 12th Street, 3rd Floor ▪ Sacramento, CA 95814-1908
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Letter J Charlene McGhee, Sacramento Metropolitan Air Quality Management District

Response J-1: Comment noted. Draft EIR pages 4.6-16 through –37 identifies specific proposed General Plan policies that provide mitigation of air quality impacts anticipated from General Plan growth.

Response J-2: Impact 4.6.1 (Conflict with the SMAQMD Regional Ozone Attainment Plan) in the Draft EIR incorrectly compared land use projections for Rancho Cordova Community to the proposed General Plan land use projections, which do not consist of the same geographic area as the Planning Area for the City of Rancho Cordova General Plan. When land use designation and associated projections for the SACOG Preferred Blueprint Scenario and the proposed General Plan for the same geographic area (Planning Area for the City of Rancho Cordova General Plan) are compared, the proposed General Plan buildout would result in 16,856 fewer dwelling units and 40,892 fewer jobs than the SACOG Preferred Blueprint Scenario. Thus, the proposed General Plan land uses are not anticipated to conflict with the proposed update of the Sacramento Regional Ozone Attainment Plan. The following text changes are made to the Draft EIR:

- Draft EIR page 4.6-16, the following changes are made to the paragraph under Impact 4.6.1:

  "In the early 1990's the Sacramento area had the fifth worst ozone air quality in the United States. The Federal CAA set new deadlines for attaining the federal ozone standards. In 1994, the Sacramento Metropolitan Air Quality Management District adopted a plan to attain this standard called the Regional Ozone Attainment Plan (also called the State Implementation Plan, or SIP). Currently, SMAQMD is in the process of updating the Attainment Plan. This update uses SACOG's Sacramento Region Blueprint: Transportation/Land Use Study as a basis for projected growth in the area (per. comm. Borkenhagen). SACOG's Blueprint has projected population of 329,110 ~~332,000~~ persons, 143,091 ~~112,290~~ housing units, and 235,913 ~~144,406~~ jobs for the area by the year 2050 for the General Plan Planning Area. ~~While the area defined as the Rancho Cordova Community by SACOG does not precisely match the General Plan Planning Area, it is within range to approximate the SACOG anticipated growth for the area.~~ The proposed Rancho Cordova General Plan projects a total buildout population of 310,568, 126,241 housing units and 195,021 jobs. Thus, the proposed General Plan would be within the land use projections being used in the update of the Attainment Plan. However, the update is not complete and the proposed General Plan land uses are not consistent with the 1994 Attainment Plan. ~~The differences in population, housing units and employment between these two growth scenarios is substantial resulting in an exceedance of the data used to formulate the Regional Ozone Attainment Plan and its ozone reduction predictions and mitigations.~~ Conflicts with the Regional Ozone Attainment Plan may result in the non-attainment of air quality standards for the SMAQMD area. This would be in direct disagreement with the

California Clean Air Act resulting in the potential loss of transportation funding for the Sacramento area. This is considered a significant impact."

- Draft EIR page 4.6-17, the following changes are made to the paragraph under "Mitigation Measures":

  "The above General Plan policies and action items would assist in the improvement of air quality conditions. However, they do not require the City to reduce future land uses to be consistent with the current 1994 Attainment Plan. As noted above the proposed General Plan would be within the land use projections being used in the update of the Attainment Plan. However, the update is not complete. ~~more inline with the Blueprint projections used in the Attainment Plan update. As such, implementation of this policy would not fully mitigate the conflict between the proposed General Plan buildout projections and those used in the update Attainment Plan.~~ In addition, there are no feasible methods to completely offset air pollutant emission increases from land uses under the proposed General Plan. Thus, this impact is considered **significant and unavoidable."**

- Draft EIR page 4.6-33 and -34, the following changes are made to the first paragraph under Impact 4.6.6:

  "Implementation of the proposed General Plan would result in substantial new development, increased population, and adversely affect regional air quality. Development under the existing General Plan would correspond to SACOG projections of households and employment that were utilized in the current Regional Attainment Plan. However, the update to the Regional Ozone Attainment Plan uses projections from the Sacramento Region Blueprint. The Sacramento Region Blueprint was intended to provide for reduced air quality impacts by compact development that reduces vehicle miles traveled and the General Plan is modeled after the Blueprint. SACOG's Blueprint has projected population of 329,110 persons, 143,091 housing units, and 235,913 jobs for the area by the year 2050 for the General Plan Planning Area. The proposed Rancho Cordova General Plan projects a total buildout population of 310,568, 126,241 housing units and 195,021 jobs. Thus, the proposed General Plan would be within the land use projections being used in the update of the Attainment Plan. However, the update is not complete and the proposed General Plan land uses are not consistent with the 1994 Attainment Plan. ~~The projected number of housing units under the proposed General Plan would be greater than under the Blueprint. Additionally, employment under the proposed General Plan would be substantially higher, with 195,021 jobs projected under the proposed General Plan and 144,406 under the Blueprint. While the additional job growth is technically inconsistent with the assumptions of the Regional Ozone Attainment Plan, this additional employment is consistent with proposed General Plan goals and overall regional strategies for reducing travel by improving the jobs/housing balance. Jobs/housing imbalances promote long distance commuting. In~~

~~Rancho Cordova, a substantial number of workers commute to the City, as the current jobs/housing ratio is 2.36:1 (2.36 jobs per housing unit). Build-out of the proposed General Plan would result in an overall jobs/housing ratio of 1.54:1 (1.54 jobs per housing unit), thus reducing the ratio of commuters to the City.~~"

Letter K

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

In Reply Refer To:
1-1-06-TA-1215

MAY 15 2006

Mr. Patrick Angell
City of Rancho Cordova Planning Department
2729 Prospect Park Drive
Rancho Cordova, CA 95670
generalplan@cityofranchocordova.org

Subject: Review and comments regarding the draft Environmental Impact Report (DEIR) for the City of Rancho Cordova's General Plan.

Dear Mr. Angell:

The U.S. Fish and Wildlife Service has reviewed the draft Environmental Impact Report (DEIR) for the City of Rancho Cordova's General Plan (General Plan). The General Plan addresses land use, growth, and development on approximately 20,000 acres within the city limits and the surrounding 58,190-acre landscape (Plan Area) over the next 20 years. The Plan Area is located in southeastern Sacramento County and is bounded by the American River to the north, the Consumes River floodplain and Sacramento County Urban Service Boundary (USB) to the south and east, and Watt Avenue to the west.

The Plan Area contains some of the most significant large vernal pool complexes remaining within California, as well as, several waterbodies (Morrison Creek, Laguna Creek, Elder Creek, Buffalo Creek, Frye Creek, and Rebel Hill Ditch), riparian, seasonal and permanent wetlands, oak woodlands, and agricultural land. These habitats support many federally and state listed plants and animals including: K-1

Crustaceans

Vernal pool tadpole shrimp	(*Lepidurus packardii*)
Vernal pool fairy shrimp	(*Branchinecta lynchi*)
Midvalley fairy shrimp	(*Branchinecta mesovallensis*)
California linderiella	(*Linderiella occidentalis*)

TAKE PRIDE IN AMERICA

Letter K Continued

Mr. Mr. Angell 2

Insects
Valley elderberry longhorned beetle (*Desmocerus californicus dimorphus*)

Amphibians & Reptiles
Western spadefoot toad (*Spea hammondii*)
Northwestern pond turtle (*Clemmys marmorata marmorata*)

Birds
Bank swallow (*Riparia riparia*)
Tricolored blackbird (*Agelaius tricolor*)
Swainson's hawk (*Buteo swainsoni*)
Burrowing owl (*Athene cunicularia*)

Plants
Slender Orcutt grass (*Orcuttia tenuis*)
Sacramento Orcutt grass (*Orcuttia viscida*)
Boggs Lake hedge hyssop (*Gratiola heterosepala*)
Ahart's dwarf rush (*Juncus leiospermus ver. ahartii*)
Sanford's sagittaria (*Sagittarius sanfordii*)
Legenere (*Legenere limosa*)

K-1 cont.

The General Plan includes residential and commercial development into a large area that is currently undeveloped. Table 4.10-2 of the DEIR indicates that there are 20,727 acres of vernal pool grasslands, including 630 acres of vernal pools. These vernal pool complexes, as mentioned previously, support many sensitive species. In particular, these complexes provide some of the best remaining habitat for the federally endangered vernal pool tadpole shrimp (tadpole shrimp) and Sacramento Orcutt grass.

The DEIR proposes little habitat protection for the significant natural resources within the Plan Area. The Service suggests that the DEIR be revised to address habitat conservation and integrity within the entire Plan Area, and not defer conservation to individual projects. Deferring conservation until individual project reviews, will likely result in non-viable, small, fragmented habitats and populations. Addressing habitat conservation and species protection at a larger landscape level can ensure that habitats remain connected and provide functioning and sustainable ecosystems to the species that rely upon them. A connected, sustainable, functioning ecosystem is not only important for creating wildlife corridors for mammals and birds, but also maintains the hydrological connectivity between streams, vernal pools, and other wetlands for dispersal of federally and/or state protected crustaceans and plants, thereby reducing the likelihood of extinction. Furthermore, planning for habitat preservation with connectivity, prior to development, is economically beneficial as connected habitats are more sustainable, and can reduce the overall management requirements needed to ensure that these habitats remain functional and species are protected into perpetuity. Additionally, setting aside high quality, connected preserves can result in greater species and habitat protection in less physical space than when preserves are isolated. K-2

Letter K Continued

Mr. Mr. Angell 3

The DEIR does not clearly depict where vernal pools and other important habitats are located and how they may be impacted by implementation of the General Plan. Also, the DEIR fails to adequately address the importance of vernal pools within Sacramento County and how recovery can be achieved following the final *Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon* (Recovery Plan) published in 2006, if the General Plan is implemented. A CD of the Recovery Plan is enclosed with this letter. Furthermore, the DEIR fails to address impacts to designated Critical Habitat within the Plan Area and how these impacts will effect recovery of vernal pool species. K-3

Additionally, the DEIR fails to adequately address cumulative impacts of implementation of the General Plan in light of the surrounding development in the Cities of Sacramento, Elk Grove, Folsom, and unincorporated Sacramento County. K-4

The City of Rancho Cordova should, prior to finalization of the DEIR, develop a habitat conservation plan (HCP) similar to the South Sacramento County HCP and its vernal pool conservation strategy to develop goals, policies, and actions to address the adverse impacts to wildlife resources that are reasonably likely to result from the implementation of the General Plan. Additionally, the revised DEIR should include maps that depict the extent and location of existing vernal pools, and planned and existing preserves for natural resources, open spaces, etc., to provide a visual description of landscape connectivity, within and adjacent to, the Plan Area. The DEIR should also be revised to include an analysis of impacts to vernal pool crustaceans and plants, including the acreage of habitat impacted, including designated Critical Habitat, and how these impacts will be minimized through the location and connectivity of habitat preserves. The DEIR should be further revised to include an analysis regarding the larger context of impacts to vernal pool grasslands in Sacramento County and to overall Recovery Plan goals, since as mentioned earlier, these vernal pools provide the best remaining habitat for the tadpole shrimp and Sacramento Orcutt grass K-5

As the DEIR is currently, the potential for adverse impacts to vernal pool habitats, vernal pool Critical Habitat, and protected species is significant. The Service has serious concerns that there are limited opportunities for adequate minimization of impacts to protected species, particularly tadpole shrimp and Sacramento Orcutt grass, their habitats, and Critical Habitat for various species. Without revisions to and additional review of the DEIR, the Service believes that the No Project Alternative retains the most appropriate land use designation (agriculture) on areas with the highest habitat value. K-6

Letter K Continued

Mr. Mr. Angell 4

Thank you for the opportunity to review the draft Environmental Impact Report for the City of Rancho Cordova's General Plan. If you have any questions regarding this letter, please contact Holly Herod, Sacramento Valley Branch chief, or myself at 916-414-6600.

Sincerely,

Kenneth Sanchez
Assistant Field Supervisor

enclosure

cc: Mr. Dan Gifford, Department of Fish and Game, Rancho Cordova, CA

cc addresses

Dan Gifford
Department of Fish and Game
Sacramento Valley-Central Sierra Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670

Letter K Kenneth Sanchez, U.S. Fish and Wildlife Service

Response K-1: Comment noted. Draft EIR pages 4.10-3 through –29 identify the habitat conditions and sensitive species noted by the commenter, while Draft EIR pages 4.9-1 through –3 note the surface water features identified by the commenter.

Response K-2: The commenter's desire for the proposed General Plan to establish large-scale habitat conservation is noted. As shown in Draft EIR Figures 3.0-7, and 3.0-9 through 3.0-15 illustrate the draft concept land use plans for the East, Grant Line North, Grant Line South, Grant Line West, Jackson, Mather, Rio del Oro and Suncreek/Preserve planning areas that are located within the vernal pool grassland habitats shown in Draft EIR Figure 4.10-1. While these draft concept land use plans are, as their name suggests, conceptual, and do not constitute site-specific land use plans for these planning areas, they do set forth "Natural Resources" designated areas (General Plan land use designation intended for natural habitat areas to not be developed) that are proposed to interconnect among several of the planning areas (e.g., interconnections of Natural Resources designated areas occurs between the Suncreek/Preserve, Grant Line North and Grant Line South planning areas as well as between the Mather and Jackson planning areas). These land use maps will likely be refined as site-specific details of the individual planning areas are identified, which could involve further expansion of the "Natural Resources" designation to conserve additional habitat areas. The proposed General Plan would designate approximately 11,115 acres as "Natural Resources", which consists of 19 percent of the overall Planning Area for the City of Rancho Cordova General Plan (58,190 acres).

In addition to the designation of Natural Resources, the proposed General Plan and Draft EIR does include proposed policies and actions (e.g., Draft EIR pages 4.10-39 through –43) that provide for protection and mitigation of impacts to biological resources and meet the definition of performance standards. The use of performance standard mitigation is allowed under State CEQA Guidelines Section 15126.4(a) and is supported by case law (*Sacramento Old City Association v. City Council of Sacramento* [3d. Dist 1991] 229 Cal.App.3d 1011, 1028 [280 Cal.Rptr. 478]). Examples of such measures include General Plan policies NR.1.1, NR.2.1 and NR.3.2; actions NR.1.1.1, NR.3.4.1, NR.4.1.1 and NR 4.1.3; and mitigation measures MM 4.10.1a through e and 4.10.5a through c. Mitigation of identified impacts are not improperly deferred. This EIR is a program EIR and allows the City to consider broad program-wide policy-level mitigation measures at the first stage of the land use process, the establishment of the land use mix, intensity and policies for the City and its Planning Area contained in the proposed General Plan, consistent with State CEQA Guidelines Section 15168. Mitigating policies and action items are properly established in the General Plan to then be further refined and implemented through the next stage of the planning process, which includes the development of specific and area plans, ordinances, standards, and specific programs. Lastly these plans, ordinances, and standards are applied to the individual development projects via the

planning review of entitlement requests. However, the Draft EIR provides full disclosure that even with implementation of these provisions, impacts to biological resources of concern would remain a significant and unavoidable consequence of implementation of the proposed General Plan, given the proposed alteration of habitat conditions of the entire Planning Area for the City of Rancho Cordova General Plan (Draft EIR pages 4.10-32 through –68). Since public release of the Draft EIR and General Plan on March 13, 2006, the City has added the following policy to the Natural Resources Element of the General Plan:

Policy NR.1.6 – Participate in the development of a habitat conservation plan to address the unique biological resources in Rancho Cordova.

The commenter is referred to Response to Comment 8-4, 8-5 and 8-11 regarding additional modification to Draft EIR mitigation measures regarding biological resources.

Response K-3: The Draft EIR contains clear descriptions and mapping of existing habitat conditions in the Planning Area (see Draft EIR pages 4.10-1 through –28) as well as the methodology and anticipated worst case direct and indirect impacts to habitat conditions (including habitats recently designated as "critical") and associated biological resources including habitat impact estimates (Draft EIR pages 4.10-32 through –68). As noted on these pages of the Draft EIR, the Draft EIR documents that implementation of the proposed General Plan would have significant and unavoidable impacts on special-status plant and wildlife species and their habitats.

Given the scale of the overall Planning Area (58,190 acres), there is not an effective way to illustrate the entire Planning Area detailed habitat conditions (e.g., vernal pool locations and distributions) and proposed General Plan land uses on map that would be legible in an EIR document. Draft EIR Figures 3.0-7, and 3.0-9 through 3.0-15 illustrate the draft concept land use plans for the East, Grant Line North, Grant Line South, Grant Line West, Jackson, Mather, Rio del Oro and Suncreek/Preserve planning areas are mapped on aerial photography that provides some illustration of underlying habitat conditions.

Response K-4: The cumulative impact analysis takes into account development in the cities of Sacramento, Elk Grove and Folsom as well as the unincorporated areas of Sacramento County. As specifically noted on Draft EIR page 4.10-63, the cumulative analysis takes into account Sacramento, Placer, Sutter and El Dorado counties and the associated development anticipated in these jurisdictions, which is consistent with State CEQA Guidelines Section 15130 provisions regarding the consideration of the cumulative setting (Draft EIR pages 4.0-9 and –10). The commenter provides no evidence supporting the claim that the cumulative setting and associated impact analysis fails to adequately the cumulative impact analysis requirements under CEQA.

Response K-5: The commenter is referred to Response to Comment K-2 regarding proposed General Plan policy language regarding the development of a HCP and Response to Comment K-3 regarding habitat mapping. The City has made several requests for SSHCP habitat mapping from Sacramento County throughout the course of the preparation of the General Plan, which have been denied. As noted in Response to Comment K-3 and K-4, the Draft EIR provides an adequate biological resources impact analysis associated with the implementation of the proposed General Plan, including estimates direct and indirect acreage impacts (Draft EIR Tables 4.10-5 and 4.10-6). In addition, the Draft EIR acknowledges that the overall Planning Area contains a large percentage of vernal pool and vernal pool grasslands in Sacramento County that would be adversely impacted by implementation of the proposed General Plan, and identified that this impact is cumulatively considerable and significant and unavoidable under CEQA (Draft EIR page 4.10-64).

Response K-6: The Draft EIR acknowledges the significant and unavoidable impacts to biological resources associated with General Plan implementation and will require the City to make required findings under CEQA (Statement of Overriding Considerations) to acknowledge these impacts, prior to approving the General Plan. The commenter's support of the No Project Alternative is noted. However, the commenter does not identify which No Project Alternative is preferred (The Draft EIR evaluated two "no project alternatives" – Sacramento County General Plan Alternative and the Existing City Boundary General Plan Alternative). Consistency of these alternatives to the project objectives is identified on Draft EIR pages 6.0-80 and –81.

Letter L

CSD-1
COUNTY SANITATION DISTRICT 1
Wastewater Collection For a Growing Sacramento

10545 Armstrong Avenue
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California
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Board of Directors
Representing:

County of Sacramento
City of Citrus Heights
City of Elk Grove
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City of Rancho Cordova
City of Sacramento

Mary K. Snyder
District Engineer
Christoph Dobson
Acting Collection Systems Manager
Wendell H. Kido
District Manager
Marcia Maurer
Chief Financial Officer

May 10, 2006
E225.000

Pat Angell
Environmental Manager
City of Rancho Cordova
2927 Prospect Park Drive
Rancho Cordova, CA 95670

Subject: Rancho Cordova General Plan Environmental Impact Report

Dear Mr. Angell:

The County of Sacramento Department of Water Quality has reviewed the General Plan draft Environmental Impact Report (EIR) on behalf of the Sacramento Regional County Sanitation District (SRCSD) and County Sanitation District-1 (CSD-1) and submits the following comments. All of the comments pertain to Section 4.12.4, Wastewater Service, beginning on page 4.12-38.

1. Generally, the draft EIR appears to fit the Districts' long range plans, given the reference to General Plan Policy ISF.2.6 requiring developers to secure certification from the Districts that capacity is available before granting of development approvals by the City. Specific text comments follow. L-1

2. Page 38; rewrite the last sentence of the first paragraph. It does not make sense as written and does not accurately reflect SRCSD's responsibility under the MIA. L-2

3. Page 39; there is a reference to Figure 4.12.4-1. That figure is out of date. The SRCSD master plan was revised in 2003, changing some interceptor alignments, including the Mather interceptor. Please use the most current figure. L-3

4. Page 40; in the description of the CSD-1 master plan, add that CSD-1 is in the process of updating the master plan, re-analyzing the required trunk facilities and updating the costs. Your text describes only 2 trunk systems serving the Planning Area. Those are existing only, several new trunk systems are planned to serve new development. L-4

5. Page 45 (note page numbering is off by 2); re-write the first paragraph, it is roughly worded. Who is the "they" in the second sentence? What is the significance of my name at the end of the paragraph? This is the only place in the section you cite a source. L-5

6. Page 46; in the second paragraph, add the trunk sheds BR Elder Creek and LC Eagles Nest, both of which are partially in the Planning Area. In the third paragraph, replace SRCSD with CSD-1 in the first sentence. CSD-1 reimburses for trunk facilities, not SRCSD. L-6

Printed on Recycled Paper

Letter L Continued

Pat Angell
May 10, 2006
Page 2

7. Page 47; the statement in the second paragraph is not necessarily true. If the Planning Area did not develop, trunk sewers would not be constructed, and interceptor sewers may not be constructed. L-7

8. Page 52; the numbers you cite in the third paragraph from the CSD-1 Master Plan are incorrect. The correct numbers are 474,156 Equivalent Single Family Dwelling (ESDs) and 155 million gallons per day (mgd) flow. L-8

9. It should be noted that in many cases the individual projects for the areas encompassed within the Planning Area require specific sewer study approvals on a case-by-case basis prior to the Final Map or Use Permit approvals, and based on the specific zoning of the property at that time. These frequently impose on developments additional mitigation measures. The Districts will condition each individual development on its individual impact on our collection and treatment systems accordingly. L-9

We expect that if development within the Planning Area is subject to established policies, ordinances, fees, and to future conditions of approval, then mitigation measures within the draft EIR and application conditions will adequately address the wastewater aspects of the project. L-10

If you have any questions, please call me at (916) 875-1563.

Sincerely,

Paul Philleo

Paul Philleo
Principal Engineer

cc: Melenie Spahn
Wendy Haggard
Amber Schalansky
Steve Norris

angell051006.ltr.doc

Letter L Paul Philleo, County Sanitation District 1

Response L-1: Commenter states that generally the Draft EIR "appears to fit the District's long range plans". No response is necessary.

Response L-2: The following changes were made to page 4.12-38, 1st paragraph, last sentence:

"Under the Master Interagency Agreement (MIA), ~~that~~ which defines the operational, financial, and administrative responsibilities of the SRCSD, the County of Sacramento and the Contributing Agencies ~~SRCSD is~~, these agencies are responsible for ~~the planning~~ and financing, construction, reconstruction, operation and maintenance of all facilities for the conveyance, treatment, and disposal of sanitary sewage and industrial waste in the Sacramento area".

Response L-3: Commenter refers to the use of an out of date Figure 4.12.4-1 *SRCSD Interceptor Upgrades and Expansions.* This figure will be revised to reflect the 2003 revision of the SRCSD Master Plan.

Response L-4: The following changes were made to page 4.12-40, 3rd paragraph:

- **"County Sanitation District 1 Sewerage Facilities Expansion Master Plan** - The overall goal of the CSD-1 Sewerage Facilities Master Plan (Master Plan) is to estimate the future capital improvement needs of the CSD-1 trunk sewer system, both in capacity relief projects for the existing system and expansion projects to serve newly developed areas. This plan provides for sewerage facilities and relief sewers to address future development within CSD-1's service area and to minimize the risk from potential sewer overflows that could occur during storm events. This plan also addresses the financial aspects of the CSD-1 Trunk Expansion Program. Currently, CSD-1 is in the process of updating the Master Plan, re-analyzing the required trunk facilities and updating the costs."

The following changes were made to reflect CSD-1's comments to page 4.12-40, 4th paragraph:

"There are two trunk systems in the Planning Area, the Cordova Trunk System and the Folsom Interceptor Trunk System, although several new truck systems are planned for the Planning Area to serve new development."

Response L-5: The following changes were made to page 4.12-45, 1st paragraph:

"Rehabilitation is ~~a~~ program specific not project specific plan. It is a system wide area wide plan. ~~They~~ CSD-1 reviews maintenance records and age of system to determine what needs to be done. Sometimes it includes cleaning or replacing or relining a pipe. It is an ongoing program. Areas with many service calls or older pipes will receive more maintenance and rehabilitation. (Paul Philleo, Department of Water Quality CSD-1)."

The use of a reference at the end of this paragraph is included to identify the source of this information. The use of cites occurs throughout the DEIR not only in this paragraph or section.

Response L-6: The following changes were made to page 4.12-46, 2nd paragraph, last sentence:

"The Master Plan identifies several future trunk sheds proposed in the Planning Area to accommodate the estimated effluent flows including AJ Aerojet, BR Zinfandel, BE Gravel East, MA Mather/Kiefer, AJ Douglas White Rock, DC Upper Deer Creek, AJ Sunrise Douglas, ~~and the~~ LC Upper Laguna Creek, BR Elder Creek, and LC Eagles Nest."

The following changes were made to page 4.12-46, 3rd paragraph, 1st sentence:

"Project developers initially finance construction of trunk lines, collector lines, and appurtenances, with some of the costs being reimbursed by ~~SRCSD~~ CDS-1".

Response L-7: The following changes were made to page 44.12-7, 2nd paragraph:

"Both EIRs were certified and the Master Plans were approved. Because these facilities would be constructed to serve the project, as well as other development in the region, the environmental impacts of these facilities are associated with development of the project. However according to CSD-1, t~~T~~hese impacts ~~would also~~ may not occur without development of the project; ~~because the trunk and interceptor lines are required to serve regional development, they would be required whether or not the project is developed~~ as trunk sewers would not be constructed and interceptor sewers may not be constructed. (Paul Philleo, Department of Water Quality CSD-1)."

Response L-8: The following changes were made to page 4.12-52, 3rd paragraph, last sentence:

"Additionally, CSD-1 uses SACOG dwelling unit projections to determine future wastewater flows. In the year 2020, CSD-1 estimates an ESDs of ~~351,800~~ 474,156 units, which calculates to a ~~134~~ 155 mgd average wastewater flow for the anticipated future CSD-1 service area (CSD-1)."

Response L-9: No response necessary, Comment noted.

Response L-10: No response necessary, Comment noted.

Letter M

Department of Water Resources
Keith DeVore, Director

Including service to the cities of
Elk Grove and Rancho Cordova

SACRAMENTO COUNTY
WATER AGENCY

MAY 22 2006

May 09, 2006

Patrick Angell

City of Rancho Cordova Planning Department

2729 Prospect Park Drive

Rancho Cordova, CA 95670

RE: **The City of Rancho Cordova General Plan**

Dear Mr. Angell:

Thank you for the opportunity to comment on the proposed City of Rancho Cordova ("City") General Plan. Much of the General Plan area lies in Sacramento County Water Agency ("SCWA") Zones 40 and 41; SCWA constructs, operates and maintains a public water supply system in these Zones. Other water purveyors in the City include the Golden State Water Company and the California-American Water Company.

We concur with the conclusion of the General Plan that sources of water supply sufficient to meet the build-out demand of the City Corporate Limits ((including those sources described in the 2005 Zone 40 Water Supply Master Plan to meet its 2030 Study Area demands) have been identified. We also agree that sources of supply to meet build-out water demand of the Planning Area have yet to be determined, but that regional water planning that includes water transfers will likely be important factors in addressing this issue. M-1

Regarding specific sections of the General Plan document, we have the following comments:

Natural Resources

1. There are several sections in the Natural Resources chapter where it would be appropriate for the City to endorse elements of the Water Forum ("WF") Plan. SCWA suggests that the General Plan include a statement of support for the WF and its two coequal objectives: (1) Provide a reliable and safe water supply for the region's economic health and planned development to the year 2030; and (2) Preserve the fishery, wildlife, recreational, and aesthetic values of the Lower American River. Where appropriate in the NR chapter, the GP should support action items consistent with the WF Plan: support implementation of the Best Management Practices for Water Conservation, including adoption of a Water Conserving Landscape Ordinance; support the WF Central Sacramento County Groundwater Management Plan; support the WF-recommended Lower American River Flow Standard; encourage age-appropriate educational programs on the area's water resources. M-2
2. bottom of p.6: "from the American *and Sacramento* Rivers" M-3
3. Action NR.5.1.3: Delete reference to designated water use days and gray water systems – these are not feasible. M-4

"Managing Tomorrow's Water Today"

Main: 827 7th St., Rm. 301, Sacramento, CA 95814 • (916) 874-6851 • fax (916) 874-8693 • www.scwa.net
Facilities Operations & Admin.: 3847 Branch Center Rd. #1, Sacramento, CA 95827 • (916) 875-RAIN • fax (916) 875-6884
Elk Grove Office: 9280 W. Stockton Blvd., Suite 220, Elk Grove, CA 95758 • (916) 875-RAIN • fax (916) 875-4046

Letter M Continued

4. Policy NR.5.2: We recommend an action item to encourage SRCSD to provide recycled wastewater for irrigation within 10 years, with a policy statement identifying those specific land uses (parks, school, etc.) where recycled water will be required. M-5

Infrastructure, Services, and Finance

On page 4, end of Water Provision paragraph: "by private wells *and diversion from surface streams.*"

Please call me should you wish to discuss.

Very truly yours,

John P. Coppola

Principal Civil Engineer

Letter M John Coppola, Sacramento County Water Agency

Response M-1: Comment noted. The Water Supply Evaluation for the City of Rancho Cordova General Plan was developed with specific input from SCWA and other area water service providers.

Response M-2: The commenter's statements and input regarding the Natural Resources Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response M-3: The commenter's statements and input regarding the Natural Resources Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response M-4: The commenter's statements and input regarding the Natural Resources Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response M-5: The commenter's statements and input regarding the Natural Resources Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Letter N

MAY 19 2006

DEVELOPMENT SERVICES
DEPARTMENT

CITY OF SACRAMENTO
CALIFORNIA

915 I STREET
3RD FLOOR
SACRAMENTO, CA
95814

May 10, 2006

Patrick Angell
City of Rancho Cordova Planning Department
2729 Prospect Park Drive
Rancho Cordova, CA 95670

SUBJECT: COMMENTS ON THE CITY OF RANCHO CORDOVA DRAFT GENERAL PLAN AND DRAFT EIR

Dear Mr. Angell:

Thank you for the opportunity to submit our comments on the Draft General Plan and EIR for the City of Rancho Cordova. Included below are comments from the City of Sacramento's Long Range Planning staff on the Draft General Plan.

1. Vision and Planning Area Boundaries

The Vision Statement in the Introduction includes goals for the City of Rancho Cordova, including "Control its destiny, including the establishment of meaningful boundaries" and "Have measurable fiscal success, and be able to provide the services and functions that make Rancho Cordova a desirable place to live, work and play." (Introduction, Page 1).

In addition, the Planning Area for the General Plan is "envisioned as the area into which the incorporated City boundaries may eventually expand" (Introduction, Page 2).

City of Sacramento Planning staff has determined that the Planning Area boundaries defined in the Public Draft general plan are not consistent with these goals outlined in the Vision for the area west of Bradshaw. N-1

a.) Figure I-1 depicts a Planning Area that extends west of Bradshaw Road to South Watt Avenue and a portion of land east of South Watt, north of Elder Creek Road, and south of Fruitridge Road. The Planning Area boundary for the area west of Mayhew Road, north of Jackson Road, and south of the American River is shown correctly as overlapping with the existing sphere of influence of the City of Sacramento. However, Figure I-1 does not show that the City of Sacramento's existing sphere of influence also covers unincorporated lands immediately east of South Watt, south of Fruitridge, and north of Elder Creek Road.

Letter N Continued

b.) The Sacramento City Manager submitted a letter dated September 13, 2005 to Rancho Cordova City Manager Ted Gaebler regarding the Planning Area Boundary (see Attachment 1). The letter requested removal of the area west of Bradshaw Road from the Planning Area Boundary due to the City's existing sphere of influence in this area. As stated in the letter, it is still the position of the City of Sacramento staff that Sacramento is the logical municipal service provider for unincorporated lands desiring to annex west of Bradshaw Road. N-1 cont.

c.) The City of Sacramento is in the process of creating a new General Plan for 2030, and the Policy Area boundary extends east to Bradshaw Road in anticipation of the City of Sacramento amending its sphere of influence concurrent with adoption of the new Plan.

2. Land Use Element

City of Sacramento Planning staff support the inclusion of Smart Growth Principles in the Land Use Element, as well as the use of Building Blocks of the City reflected in the Neighborhood, Villages and Districts to achieve the goals of Smart Growth.

Specific comments on this Land Use Element are focused on the proposed uses shown on the General Plan Land use Map (Figure LU-4), as well as the conceptual plans for the Jackson Planning Area.

a.) The General Plan Land Use Map (Figure LU-4) shows general land use designations for areas that are already mostly developed including the Rosemont area north of Jackson and west of Bradshaw. The designation of Surface Mining for northwest corner of Jackson and Bradshaw does not reflect the City of Sacramento's understanding of the long-term reuse potential for this site. The Local Town Center designated for this area would also not be compatible with Surface Mining as designated. The lack of any adjacent residential designations in the Jackson Planning Area conceptual plans would not be supportive of this Local Town Center designation.

b.) Jackson Planning Area - The Conceptual Land Uses for this Planning Area are described as serving "to transition from urban to rural uses at the City's edge" (Land Use, p 63). While there are certainly environmental constraints within this area, including the 100-year floodplain along Morrison Creek, the conceptual land use for this area is not consistent with the City of Sacramento's vision for the area west of Bradshaw and east of South Watt. N-2

The designation of a Local Town Center at Bradshaw Road and Jackson Highway for a higher density, mixed-use environment would be limited by the designations for surface mining, natural resources, and light industrial uses around its edges.

The Mather CLUP boundaries shown on the concept plan reflect existing policy. However, the Sacramento County Airport system is in the process of working on airport planning and land use initiatives that would establish a new Airport Land Use Compatibility Plan (ALUCP, formerly CLUP) for Mather Airport that would likely have different noise contours and development restrictions than what is currently shown. Use restrictions shown are based on an outdated 60 dB CNEL noise contours that are expected to be less extensive than what is currently adopted, allowing for more residential and higher-density development in the area west of Bradshaw.

The City of Sacramento, in its forthcoming 2030 General Plan Land Use Alternatives to be released for public review and comment later this Spring, is proposing to designate the area west of Bradshaw and south of Jackson as a New Growth area . We anticipate that urban forms would be predominantly Village-Traditional, featuring residential interspersed higher-density Village Centers.

Rancho Cordova Draft General Plan/EIR
Comments
Page 2 of 3

Letter N Continued

3. Circulation Element

The Transportation Planning unit in Long Range Planning reviewed the Circulation Element and corresponding section of the Draft EIR, and comments are as follows:

General comment: We are concerned about the "urban intersections" in the Circulation Element. It isn't clear how these will look, or how they will affect pedestrians, bicyclists, etc.

Policy C.2.4 – Use of the word "adjusted" may leave an option for sidewalks to be decreased, as well as increased. However, downsizing sidewalks should be avoided, particularly due to ADA concerns.

Action C.2.7.2. and C.2.8.2. – City staff supports these actions.

Action C.2.8.6. – Possibly a hot political issue, after recent issues with police citing cyclists and blaming cyclists for most car/bicycle collisions (see recent SacBee article from the Internet: http://www.sacbee.com/content/news/story/14244169p-15062753c.html) N-3

Action C.2.8.8. – Elaborate on pedestrian improvement crossings. Will this include lighting, visibility (e.g. tree removal), striping, etc?

Policy C.2.9. – Could strengthen this by changing it to "Explore the feasibility of requiring bike parking, showers, and lockers in City facilities . . ."

Action C.3.3.1. – City staff supports these actions/policies.

Action C.5.3.2. – We recommend that bike/ped facilities be included in addition to "road improvements and new roads" in this fee district.

Actions C.6.2.1. and C.6.2.2. – Is there a missing policy C.6.2. or is this just a typo?

If you have any further questions, please contact me at (916) 808-2022.

Sincerely,

Erik de Kok
Associate Planner

Enclosures

cc: Steve Peterson, Principal Planner
Jim McDonald, Senior Planner
Sparky Harris, Senior Planner
Tara Goddard, Assistant Planner

Rancho Cordova Draft General Plan/EIR
Comments
Page 3 of 3

Letter N Erik de Kok, City of Sacramento Development Services Department

Response N-1: The commenter's statements and input regarding the Vision and Planning Area boundaries are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response N-2: The commenter's statements and input regarding the Land Use Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. Environmental issues associated with compatibility with surface mining and Mather Airport noise has been addressed in Sections 4.1 (Land Use), 4.4 (Hazards and Human Health), 4.7 (Noise) and 4.8 (Geology and Soils) of the Draft EIR.

Response N-3: The commenter's statements and input regarding the Circulation Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is referred to Section 4.5 (Transportation and Circulation) regarding potential pedestrian and bicycle impacts.

Letter O

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

May 16, 2006

MAY 22 2006

Patrick Angell
City of Rancho Cordova
2729 Prospect Park
Rancho Cordova, CA 95670

Subject: Rancho Cordova General Plan
SCH#: 2005022137

Dear Patrick Angell:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on May 15, 2006, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. O-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Letter O Continued

Document Details Report
State Clearinghouse Data Base

SCH#	**2005022137**
Project Title	Rancho Cordova General Plan
Lead Agency	Rancho Cordova, City of

Type	**EIR** Draft EIR
Description	The proposed City of Rancho Cordova General Plan would replace the existing General Plan, which the City adopted from Sacramento County upon incorporation in July 2003. The City's proposed General plan and associated land use map would generate additional residential, commercial, office, and recreational uses throughout the entire General Plan Planning Area and include substantial improvements to the roadway system.

Lead Agency Contact

Name	Patrick Angell		
Agency	City of Rancho Cordova		
Phone	(916) 361-8384	***Fax***	
email			
Address	2729 Prospect Park		
City	Rancho Cordova	***State*** CA	***Zip*** 95670

Project Location

County	Sacramento			
City				
Region				
Cross Streets	Planning Area			
Parcel No.	Many			
Township		***Range***	***Section***	***Base***

Proximity to:

Highways	SR-16
Airports	Mather
Railways	Union Pacific
Waterways	American River, Consumnes River, Folsom South Canal
Schools	
Land Use	Various

Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Cumulative Effects; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Job Generation; Minerals; Noise; Public Services; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian
Reviewing Agencies	Resources Agency; Department of Conservation; Department of Fish and Game, Region 2; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 3; Department of Housing and Community Development; Department of Health Services; Regional Water Quality Control Bd., Region 5 (Sacramento); Native American Heritage Commission; State Lands Commission

Date Received	03/13/2006	***Start of Review***	03/13/2006	***End of Review***	05/15/2006

Note: Blanks in data fields result from insufficient information provided by lead agency.

Letter O Terry Roberts, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

Response O-1: The comment is noted. The comment states that the State Clearinghouse did not receive any comments from state agencies by the close of the comment period, May 15, 2006. The City of Rancho Cordova did receive a comment letter from the state Department of Fish and Game (see Comment Letter C) and a late comment letter from Caltrans (See Comment Letter P), to which the City has responded in these Responses to Comments.

Letter P

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 3 – SACRAMENTO AREA OFFICE
VENTURE OAKS – MS 15
P.O. BOX 942874
SACRAMENTO, CA 94274-0001
PHONE (916) 274-0614
FAX (916) 274-0648
TTY (530) 741-4509

Flex your power!
Be energy efficient!

May 17, 2006

06SAC0052
03-SAC-50
Rancho Cordova General Plan
Draft Environmental Impact Report (DEIR)

Mr. Patrick Angell
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova, CA 95670

Dear Mr. Angell:

Thank you for the opportunity to review and comment on the Rancho Cordova General Plan DEIR. Our comments are as follows:

- We applaud the City for proposing a system of parallel roadways, providing connectivity throughout the City, and offering viable alternatives to highway use. P-1
- Caltrans agrees that the proposed General Plan would exacerbate low Level of Service (LOS) operations on eastbound and westbound U.S. 50 during a.m. and p.m. peak hours. We agree that this impact is significant. P-2
- If LOS is further degraded by development identified in the General Plan, those impacts will need to be mitigated by the City. P-3
- The Capital Improvement Program (CIP) mentioned on page 4.5-19, 45, 47 should be expanded to include mainline improvements to U.S. 50 and SR 16, including proportional share funding for HOV lanes on U.S. 50 between Sunrise Blvd. and downtown Sacramento P-4
- The mitigation measures stated on page 4.5-55 maintain that although implementation of proposed General Plan policies and action items would assist in reducing its cumulative contribution to regional traffic effects, this impact would still be considered cumulatively considerable and a significant and unavoidable impact. The City states that it does not have jurisdiction and therefore cannot ensure potential mitigation project completion. Although the impacts and potential mitigations are outside the City's jurisdiction boundary, the City still has responsibility to mitigate those impacts. Caltrans will work with the City to identify specific projects on the State Highway System and appropriate proportional share funding contribution mechanisms. P-5

"Caltrans improves mobility across California"

Letter P Continued

Mr. Patrick Angell
May 17, 2006
Page 2

- On page 4.5-21, 22, where there are conflicts with Design Information Bulletin 77 (DIB 77), particularly in relation to the Sacramento Region Blueprint process, Caltrans will work with the City to evaluate interchange issues on a case by case basis. P-6

- We agree that the Bicycle/Pedestrian Master Plan should include additional overcrossings of U.S. 50 to improve connectivity between areas of the City. P-7

Please inform our office of any public meetings related to the General Plan so that a staff member may attend. Also, please provide our office with a copy of a revised draft EIR or final EIR as it becomes available. If you have any questions regarding these comments, please contact Andrew Stresser at (916) 274-0629.

Sincerely,

Bruce de Terra, Office Chief
Office of Transportation Planning - South

cc: Andrew Stresser, Transportation Planning

"Caltrans improves mobility across California"

Letter PBruce de Terra, California Department of Transportation

Response P-1: The commenter's statements and input regarding the Circulation Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response P-2: The commenter agrees with the conclusions of the Draft EIR regarding traffic impacts to U.S. 50. No further response is required.

Response P-3: The commenter is referred to Draft EIR pages 4.5-45 through –48, which identifies that General Plan implementation would impact LOS on U.S. 50, and that full mitigation of this impact is outside of the City's jurisdiction.

Response P-4: The proposed General Plan Circulation Element includes the provision of widening SR 16 to a six lane expressway (Draft EIR Figure 3.0-19) and the Draft EIR identifies that SR 16 would operate acceptably (LOS C or better). The City will continue to participate with Caltrans and the region on its fair share to state highway improvements.

Response P-5: Comment noted. The commenter is referred to Response to Comment P-3 and P-4.

Response P-6: Comment noted. Since no comments regarding the adequacy of the Draft EIR were received, no further response is required.

Response P-7: The commenter's statements and input regarding the Circulation Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Letter Q

SMUD

SACRAMENTO MUNCIPAL UTILITY DISTRICT

6201 S Street, P.O. Box 15830, Sacramento, CA 95852-1830. (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

May 12, 2006
DS06-099

Rancho Cordova General Plan EIR
C/O Pat Angell, Environmental Manager
2729 Prospect Park Drive
Rancho Cordova, CA 95670

Subject: **Comments to the City of Rancho Cordova's General Plan Draft Environmental Impact Report**

Dear Mr. Angell,

Thank you for the opportunity to review the Draft Environmental Impact Report for the City of Rancho Cordova's General Plan. Following are specific comments to sections of the Draft EIR on behalf of the Sacramento Municipal Utility District's Distribution Planning department:

- On page 4.12-104, it states "To serve the anticipated development through 2020, SMUD is constructing a new 230 kV to 69 kV bulk power substation within the SunRidge Specific Plan area, south of Douglas Road and east of Sunrise Boulevard. To deliver the electricity beyond 2020, SMUD has indicated the need for new substations, and new 69kV and 12 kV lines." Please revise to state "To serve the anticipated development through 2020, SMUD requires several new distribution substations, and new 69kV and 12 kV lines. In addition, SMUD is constructing a new 230 kV to 69 kV bulk power substation within the SunRidge Specific Plan area, south of Douglas Road and east of Sunrise Boulevard. To deliver the electricity beyond 2020, SMUD has indicated the need for additional distribution substations, and 69kV and 12 kV lines." Q-1

- On page 4.12-107, it states that "SMUD has indicated that it would have adequate supply and infrastructure to serve the electricity demands generated from the Rancho Cordova General Plan under buildout conditions and, which is estimated at approximately 1,100 MW, in addition to meeting other demands within its service area (Angeja, January 2006)." Please note that the letter referenced stated that the estimated demand is approximately 1,200 MW. Q-2

If you have any questions regarding these comments, please contact me at (916) 732-5249 or via email at mellis@smud.org.

Sincerely,

Malissa L. Ellis
Senior Distribution System Engineer
Distribution Services

Letter Q Malissa Ellis, Sacramento Municipal Utility District

Response Q-1: Comment noted. The following changes are made to the Draft EIR.

- Draft EIR page 4.12-104, the first paragraph under Impact 4.12.8.1 is modified as follows:

  "Under buildout conditions as identified in the General Plan, the demand of electricity may reach up 1,200 MW including existing and projected future loads. Of this, approximately 650 MW of electrical power would be needed within the existing city limits and 550 MW for portions of the Planning Area outside the current city boundaries. To serve the anticipated development through 2020, SMUD requires several new distribution substations and new 69kV and 12kV lines. In addition, SMUD is constructing a new 230 kV to 69 kV bulk power substation within the SunRidge Specific Plan area, south of Douglas Road and east of Sunrise Boulevard. This substation will be integrated into the existing substation, transmission, and delivery system. To deliver the electricity beyond 2020, SMUD has indicated the need for additional distribution ~~new~~ substations, and new 69 kV and 12 kV lines. New overhead 69 kV power lines would be installed within the existing transmission line corridors to reduce visual and other potential environmental impacts, where feasible. SMUD annually updates its demand projections and will modify and update its system plans in response to growth. In addition to electric facilities, SMUD requests specific power line easements and right of ways during the planning stages of new development. All electrical distribution lines, substations, transmission, delivery facilities, and easements required to serve the Planning Area are subject to CEQA review. SMUD does not foresee any capacity shortages or problems in meeting the buildout demands associated with the Rancho Cordova General Plan (Angeja, 2006). Potential environmental effects of obtaining more power through the development of power plants include, but are not limited to, air quality, biological resources, cultural resources (depending on location), hazardous materials, land use, noise and vibration, traffic, visual resources, waste management, water and soil resources, and health hazards. Potential environmental effects for the construction of transmission lines include, but are not limited to, air quality (during construction), biological resources (depending on location), cultural resources (depending on location), hazardous materials, land use, noise and vibration (during construction), traffic, visual resources, and health hazards."

Response Q-2: Comment noted. The following changes are made to the Draft EIR.

- Draft EIR page 4.12-107, the following text changes are made to the last paragraph:

  "Every year, the Business Planning and Budget Group at SMUD publishes its Load Forecast and Economic Outlook, analyzes and evaluates the estimated power usage over the next ten years and plans for electrical generation and purchase to cover this usage. In

the latest such report, SMUD has indicated that it would have adequate supply and infrastructure to serve the electricity demands generated from the Rancho Cordova General Plan under buildout conditions and, which is estimated at approximately 1,200 1,100 MW, in addition to meeting other demands within its service area (Angeja, January 2006). PG&E has also indicated that it has adequate natural gas supply and would extend infrastructure, as needed, to serve the growth anticipated under cumulative conditions."

Letter 1

Victoria E Harris wrote:

> Hello, I received a flyer in the mail last week announcing the
> availability of the Draft General PLan and Draft EIR for public
> review. I understand that the EIR is available in hard copy for over
> $200 which I cannot affort to buy. I did get a copy of the CD as
well

> as finding it on the City website.
>
> Unfortunately, both the copy of the DEIR on the Website and on the CD
> are flawed. I am very interested in the Alternative analysis of the
> DEIR. On both the website and on the CD the maps depicting the
> Alternative 3 project plans are not included (within Chapter 6).
> There are titles but no maps.
>
> Could one of you make sure this problem is fixed? 1-1
>
> In light of the problem I would urge the City should extent the
> comment period for the EIR for another 45 days from the time the maps
> become available on the website and on a new CD.
>
> I would appreciate an update on the status of the maps and hopefully
a

> favorable response on the extension of the comment period. As you
all

> may know it is a daunting task to try and review the huge volumes
> in such a short time, most particularly when one works fulltime.
>
> Thank you for your consideration
>
> Victoria Harris
> 2216 Rossmoor Drive
> RC 95670

Letter 1Victoria Harris, Resident

Response 1-1: The figures that illustrate the alternatives in the section "6.0 Alternatives" PDF document (424 KB) of the Draft EIR files on CDs provided by the City were accidentally omitted as a result of a production error. However, the "Draft Environmental Impact Report - Full Document" PDF document (20 MB in size) provided on the CD did contain the figures. The City distributed a notice regarding this error associated with the CD on April 27, 2006 and also extended the public review period of the Draft EIR from April 27, 2006 to May 4, 2006. Corrected CDs were also made available, and the Draft EIR version on the City website was also corrected. In addition, the comment period was further extended by the City Council to May 15, 2006 as a result of a written request for extension of the General Plan and EIR review period (see Comment Letter 2).

Letter 2

URBAN CREEKS COUNCIL
SACRAMENTO

4855 Hamilton Street, Sacramento, CA 95841
(916) 482-8377 - Fax (916) 483-1320
Email: ucc@arcadecreekrecreation.com

March 21, 2006

Paul Junker
City of Rancho Cordova
Planning Department
2729 Prospect Park Drive
Rancho Cordova, CA 95670

Re: Request extension of comment period on General Plan and DEIR

Mr. Junker:

We are requesting that an extension of at least 30 days be granted on the time allowed for review and comment on the draft General Plan and the Environmental Impact Report.

Several elements of the plan are of interest to our organization. The environmental document analyzing those elements is extensive. More than 45 days is needed in order for us to read and then comment thoughtfully on the General Plan. 2-1

Since the 45 day comment period is a statutory minimum, not a maximum, and the DEIR is over 1,000 pages, we hope you will find this request a reasonable one.

Sincerely,

Alta Tura, President

Letter 2Alta Tura, Urban Creeks Council

Response 2-1 At the March 28, 2006 General Plan Workshop, the Rancho Cordova City Council further extended the Draft EIR public comment period to May 15, 2006 as a result of this written request to extend the comment period. The total comment period on the Draft EIR was 63 days, which meets the requirements of the State CEQA Guidelines (Section 15105[a]).

Letter 3

From: Victoria E Harris [vic-kaos@pacbell.net] Sent: Mon 3/27/2006 1:18 PM
To: Linda Budge; Paul Junker-RC
Cc: Victoria E Harris; Robert McGarvey; David Sander; Dan Skoglund; Ken.Cooley@comcast.net; Patrick Angell; Brenda Lehr-RC; Charlene_Fortunka_RC
Subject: Re: General Plan EIR Problems

Thank you for looking into this matter of the missing alternative maps. Unfortunately for me the entire EIR file is so big that is just crashes my computer when I try to open it (both the one on the CD and the one on the Website). It is much easier to read and scroll through the individual chapters. Any chance the alternative maps can be put into the chapter (6) on the website? I would really appreciate it.

Also, I would like to request a 30 day extension to the comment period for the EIR.

Thanks you all for your consideration of this.

SIncerely,

Victoria Harris
2216 Rossmoor Drive

Linda Budge <lnbg@comcast.net> wrote:

thanks for the clarification!

Paul Junker wro te:

3-1

Linda, Thanks for responding directly to Victoria. We now have paper copies of the EIR with the missing Land Use pages at City Hall. Additionally, there are figures missing on the individual EIR Alternatives section on the website and the CD version of the EIR. However, the complete Alternatives section with all figures is provided on both the website and on the CD - please see the complete document rather than the individual section - I have confirmed that all figures are in fact contained in the "one piece" website and CD versions of the EIR Volume I. Apologies for the confusion. The website version will be corrected on Monday and anyone receiving the CD's will be directed to the main document for Alternatives figures. Paul
Paul Junker, Planning Director City of Rancho Cordova (916) 851-8751 Please note change of address for City Hall:
2729
Prospect Park Drive Rancho Cordova, CA 95670 --
---Original Message----- From: Linda Budge [mailto:lnbg@comcast.net] Sent: Saturday, March 25, 2006 10:09 AM To: Victoria E Harris Cc: Paul

Letter 3 Continued

Junker; Robert McGarvey; David Sander; Dan Skoglund
Subject: Re: General Plan EIR Problems there was
an error in Section 4.1, and the public comment
period has been extended to May 4th. Linda Budge.
Victoria E Harris wrote:

> Hello, I received a flyer in the mail
> last week announcing the availability
> of the Draft General PLan and Draft EIR
> for public review. I understand that
> the EIR is available in hard copy for
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> as finding it on the City website.
> Unfortunately, both the copy of th
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> on the Website and on the CD are
> flawed. I am very interested in the
> Alternative analysis of the DEIR. On 3-2
> both the website and on the CD the maps
> depicting the Alternative 3 project
> plans are not included (within Chapter
> 6). There are titles but no maps.
> Could one of you make sure this problem
> is fixed? In light of the problem I
> would urge the City should extent the
> comment period for the EIR for another 45
> days from the time the maps become
> available on the website and on a new CD.
> I would appreciate an update on the
> status of the maps and hopefully a
>
> favorable response on the extension of
> the comment period. As you all
>
> may know it is a daunting task to try and
> review the huge volumes in such a short
> time, most particularly when one works
> fulltime. Thank
> you for
> your consideration Victoria Harris
> 2216 Rossmoor Drive RC 95670

No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.1.385 / Virus Database: 268.3.1/291 - Release Date: 03/24/2006

Letter 3Victoria Harris, Resident

Response 3-1: As noted in Response to Comment 1-1, corrected versions of the CD and corrections to the City website were made available on March 27, 2006. The commenter is referred to Response to Comment 2-1 regarding the extension of the public review period for the Draft EIR.

Response 3-2: The commenter is referred to Response to Comment 1-1.

Letter 4

To: Planning Commission, City of Rancho Cordova
From: Victoria Harris, 2216 Rossmoor Drive
Date: April 13, 2006
Re: EIR for Rancho Cordova General Plan

Dear Commissioners:

I live in the Riverside area of Rancho Cordova (Rossmoor at Coloma). I really like living in Rancho Cordova today, but I am truly concerned about the future of the City. I have been reviewing the City's Proposed General Plan and the EIR for the General Plan.

The EIR identifies several what are called "significant and unavoidable environmental impacts." This means that the impacts on the environment are considered significant and cannot be mitigated. These include:

- Expose sensitive receptors to substantial pollutant concentrations.
- Create objectionable odors affecting a substantial number of people.
- Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections).
- Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.
- Result in the need for new systems or a substantial expansion or alteration to the local or regional water supplies that would result in a physical impact to the environment. 4-1
- Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFG or USFWS
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, rivers, etc.) through direct removal, filling, hydrological interruption, or other means.
- Cause a substantial adverse change in the significance of an archaeological resource or an historical resource as defined in Public Resources Code section 21083.2 and CEQA Guidelines section 15064.5, respectively;

In looking over the transportation section, I am seeing that my little house in the Riverside area will be gridlocked. Transportation engineers call it "Level of service F", the worst traffic flow (basically no flow). This would happen on many roadways in the City under the proposed General Plan. What affects me the most is the LOS F on Folsom from 50 to Mather Field, and at Zinfindel from Folsom to 50, and at Sunrise (many locations). Right now I try not to travel on Sunrise after about 3 or 3:30 on weekdays. The EIR says it is going to get a lot worse. This is unacceptable. 4-2

Letter 4 Continued

Rancho Cordova Planning Commission, April 13, 2006 **Page 2**

The General Plan says under full development five times more people will be added to Rancho Cordova by 2030. The small community of 55,000 will swell to over 300,000. That is a lot of cars on the roads, pollutants in the air, noise, loss of open space, etc. I understand the regional perspective (SACOG Blueprint) and am aware that City is being encouraged to participate in the region's Smart Growth program to help carry some of the burden for the incoming population. But I wonder how smart we are both as a city and as a region if we sacrifice our quality of life so significantly. 4-3

The beautiful vernal pools that so much represent Rancho Cordova in the spring will be gone under the proposed General Plan, except for a few hundred acres of reserves, most of which already exist. The EIR says that as much as 22,000 acres of vernal pool grassland could be destroyed by development. In addition, such habitat loss will contribute to the demise of several listed endangered and threatened species that now call the vernal pools and surrounding grassland home. 4-4

The California Environmental Quality Act (CEQA) Guidelines state that an EIR must describe a reasonable range of feasible alternatives to the project that could feasibly attain most of the basic project objectives and would avoid or substantially lessen any of the significant environmental impacts of the project. According to the General Plan EIR, there are no feasible alternatives that would negate the significant unavoidable impacts and that would meet the City's objectives. 4-5

I understand that the City can draft a series of "findings of overriding considerations" that would allow it to approve the General Plan's significant and unavoidable impacts without additional consideration due to the fact that no other alterative would meet the General Plan's objectives. I am worried about this. I believe all impacts of such growth should be adequately mitigated. To simply ignore such significant and unavoidable impacts because they do not meet the general plan objectives (in particular the economic objectives) is totally unacceptable. The City instead must change its objectives. 4-6

To conclude, I would hope that this young City does not approve this General Plan. I believe that the citizens of Rancho Cordova should not have to live with significant and unavoidable environmental impacts. We must more closely examine how we can grow and flourish without jeopardizing our quality of life, and most importantly the quality of life of future generation whom we absolutely must considered when making such important decisions about our future. 4-7

Sincerely,

Victoria Harris
2216 Rossmoor Drive
Rancho Cordova, 95670
916-635-1947

Letter 4Victoria Harris, Resident

Response 4-1: The commenter refers to significant and unavoidable impacts identified by the Draft EIR associated with the implementation of the proposed General Plan. A complete list of significant and unavoidable impacts is provided in Section 7.0 (Long-Term Implications) of the Draft EIR (Draft EIR pages 7.0-5 through –11). It should be noted that creation of objectionable odors was not identified as a significant and unavoidable impact in the Draft EIR.

Response 4-2: Draft EIR Tables 4.5-6, 4.5-7 and 4.5-8 identify that deficient level of service operations on Folsom Boulevard would be limited to the segment between Mather Field Road and Coloma Road, while Zinfandel Drive (from Folsom Boulevard to the U.S. 50 westbound ramps) is projected to operate adequately (see Draft EIR pages 4.5-28 through –32). However, it is acknowledged that Sunrise Boulevard is projected to operate at a deficient level of service from Gold Country Drive to White Rock Road.

Response 4-3: The commenter's concerns regarding the environmental effects of increased population in the City are noted. Air quality, noise and loss of open space are addressed in Sections 4.6 (Air Quality), 4.7 (Noise), 4.2 (Agriculture), 4.10 (Biological Resources) and 4.13 (Visual Resources/Light and Glare) of the Draft EIR.

Response 4-4: The commenter's concerns regarding the potential destruction of vernal pool habitat are noted. The Biological Resources Section (Section 4.9) of the Draft EIR does acknowledge that implementation of the General Plan could result in significant direct and indirect impacts to wetland habitat (including vernal pools) as well as to special-status plant and wildlife species from changes in land use (i.e., urbanization) (Draft EIR pages 4.10-34 through –68).

Response 4-5: Section 6.0 (Project Alternatives) of the Draft EIR identifies alternatives that would reduce biological resource impacts as compared to the proposed project, and would meet some of the project objectives. Alternatives identified to reduce biological resource impacts, which would meet some (though not all) of the project objectives include the Sacramento County General Plan Alternative (Alternative 1), Existing City Boundary General Plan Alternative (Alternative 2) and the Natural Resources Conservation Alternative (Alternative 3) (see Table 6.0-1, Draft EIR pages 6.0-88 through –90).

Response 4-6: The commenter is correct that the City will be required to make required findings and a statement of overriding considerations for identified significant and unavoidable impacts under CEQA in order to adopt the proposed General Plan. However, the City may modify the General Plan based on the information provided in the Draft and Final EIR, which could include the further consideration of an alternative evaluated in the Draft EIR. An EIR is an informational document for decision-makers and the general public that analyzes the significant environmental effects of a project, identifies possible ways to minimize significant effects, and

describes reasonable alternatives to the project that could reduce or avoid its adverse environmental impacts (State CEQA Guidelines Section 15121[a]). The City is required to consider the information in the EIR, along with any other relevant information, in making decisions associated with the General Plan.

Regarding the consideration of the alteration of the project objectives, the project objectives associated with the General Plan are based on the City of Rancho Cordova Vision Book, Revised Draft Land Use Map Book and the proposed General Plan, all of which were developed over several public workshops and meetings since 2004.

Response 4-7: The commenter's concerns regarding the identified significant and unavoidable impacts of the implementation of the proposed General Plan are noted.

Letter 5

-----Original Message-----
From: lllladd@sprintmail.com [mailto:lllladd@sprintmail.com]
Sent: Thursday, April 27, 2006 10:23 AM
To: Hilary Anderson; lewisc@surewest.net; vic-kaos@pacbell.net; grapeindep@aol.com; dmsander@sanderassociates.com; rmcgarvey@cityofranchocordova.org; lbudge@cityofranchocordova.org; ken.cooley@cityofranchocordova.org; dskoglund@cityofranchocordova.org; tgaebler@cityofranchocordova.org; flweiland@yahoo.com; danielfscott@att.net; kwagner@enviroqualitylaw.com
Cc: Paul Junker-RC; Pam Johns
Subject: Viewsheds in Open Space

Thanks Hilary, the draft open space performance standards document is very useful. My formal written request would be that in the places where "Viewing" is listed amongst Activities/Uses that "Viewshed" be one of the corresponding elements. Or does that create consistency problems with the EIR finding 4.13.2 Degradation of a Scenic Vista that "Due to the distance from the Sierras and the existing diffuse and scattered views" said views are less than significant? 5-1

Thanks,

Larry Ladd

-----Original Message-----
From: Hilary Anderson
Sent: Apr 26, 2006 7:02 PM
To: lewisc@surewest.net, vic-kaos@pacbell.net, flweiland@yahoo.com, danielfscott@att.net, kwagner@enviroqualitylaw.com, lllladd@sprintmail.com
Cc: Paul Junker , pjohns@pacificmunicipal.com
Subject: RE: Rancho Cordova General Plan Workshop & Open Space Standards

Attached is the draft open space performance standards, which I forgot to attach to the email earlier today.

Letter 5Larry Ladd, Resident

Response 5-1: Utilization of viewsheds as an element of open space performance standards by the City would not conflict with the conclusion of the Draft EIR regarding impacts to scenic vistas. As documented in the Draft EIR page 4.13-7:

From the northeastern portions of the Planning Area, during clear weather conditions, there are distant scattered and diffused views of the El Dorado County foothills and the Sierra Nevada. Diffused or scattered views are those views that are partially obstructed and limited by distance, trees, existing structures, intervening topography or vegetation, air quality conditions, and weather conditions. Implementation of the General Plan could result in future annexation and development of much of the southern portions of the Planning Area. Although new roadways and public facilities (parks, restaurants) may provide additional access to the area and thus more opportunities for distant views of the Sierra Nevada, that same development and associated landscaping will further obstruct and scatter opportunities for diffused views of the Sierras. Due to the distance from the Sierras and the existing diffused and scattered nature of the available views, opportunities to view this scenic vista are currently limited and the implementation of the General Plan represents a less than significant affect on this scenic vista.

New development and redevelopment activities proposed in association with the General Plan that are adjacent to the Parkway must comply with viewshed protections contained within the American River Parkway Plan that will ensure no significant degradation of the scenic viewshed. Views of the Sierra afforded in the northeastern of the Planning Area are too distant and diffused to be considered an important scenic vista.

Letter 6

HARDING LARMORE MULLEN
JAKLE KUTCHER & KOZAL, LLP
ATTORNEYS AT LAW

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May 12, 2006

VIA FEDERAL EXPRESS

Rancho Cordova General Plan EIR
c/o Pat Angell, Environmental Manager
2729 Prospect Park Drive
Rancho Cordova, California 95670

MAY 15 2006
PACIFIC MUNICIPAL CONSULTANTS

Re: Rancho Cordova General Plan and EIR

Ladies and Gentlemen:

On behalf of our client, Riverview Vista, LLC and Ms. Ya-Ping Huang, we have reviewed the March, 2006 draft of the Rancho Cordova General Plan and the related EIR and wish to comment on the Convention Center Overlay Zone proposed in the Plan for a portion of the Folsom Boulevard Planning Area, with particular attention to the westerly portion of that Zone adjacent to the intersection of Highway 50 and Folsom Boulevard.

In order to avoid any uncertainty, we request that the Plan include a statement that high-density residential development to support the Convention Center-related development be included in the Plan and the related description of housing development in the Plan and the EIR. The Plan provides that residential development up to 80 units per acre is one permitted use in the Folsom Boulevard Planning Area and we would not want the placement of the overlay to be interpreted as an exclusion for that type of development in that area so long as it supports the convention uses. In addition, we suggest that the western portion of the Overlay Zone be considered a transition area to knit the Overlay Zone to the adjacent Downtown Planning Area. In order to accomplish these minor policy modifications, we suggest the following specific changes to the Plan and EIR: 6-1

1. On page 20 of the Land Use Element of the Plan, add the following sentence at the end: "The western portion of the Overlay Zone can be permitted to accommodate a variety of transitional uses from the adjacent Downtown Planning Area to the Overlay Zone, such as research and development, retail, restaurant and professional office as well as residential to support those uses. Residential to support the convention and related convention-oriented uses shall also be permitted in other appropriate locations of the Overlay Zone. The density of residential development is to be consistent with that permitted elsewhere in the Folsom Boulevard Planning Area."

Letter 6 Continued

HARDING LARMORE MULLEN
JAKLE KUTCHER & KOZAL, LLP
ATTORNEYS AT LAW

Rancho Cordova General Plan EIR
c/o Pat Angell
May 12, 2006
Page 2

2. A description of the Convention Center Overlay Zone similar to that on page 20, as revised above, should be added to the description of the Folsom Boulevard Planning Area on pages 50 and 51.

3. Add a new Action items ED 3.3.6 and ED 3.3.7 to the Economic Development Element of the Plan to read as follows:

- **Action ED 3.3.6 –** Review development proposals for land within the western portion of the Convention Overlay Zone to permit transitional uses from the Downtown Planning Area, such as research and development, retail, restaurant and professional office, as well as residential to support those various uses and those in the Downtown Planning Area. 6-1 cont.

- **Action ED 3.3.7 –** Encourage residential development in appropriate locations in the Convention Overlay to support convention, hotel, restaurant and other convention-related uses, including housing for all economic levels.

These Action items would then be added to page 15 of the Implementation matrix under the responsibility of the Planning Department as ongoing items.

4. Assuming the statement is accurate, we suggest adding to the EIR the following sentence at the end of the first paragraph under the heading "Land Use Map" on page 3.0-14: "The calculations set forth in this EIR for residential development, housing units and population assume residential density of 20 units per acre for the Folsom Boulevard Planning Area."

Should you have any questions with respect to any of these comments and suggestions, please contact Ms. Huang or me at your convenience.

Sincerely,

Thomas R. Larmore

Thomas R. Larmore

cc: Curt Haven (via email)
Paul Junker (via email)
William Campbell (via email)
Ya-Ping Huang (via email)

Letter 6Thomas Larmore, Harding Larmore Mullen Jakle Kutcher & Kozal, LLP

Response 6-1: The commenter's statements and input regarding the General Plan are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Letter 7

May 15, 2006

City of Rancho Cordova
Patrick Angell, EIR Manager
2729 Prospect Park Drive
Rancho Cordova, CA 95670
RE: Rancho Cordova General Plan EIR

Dear Mr. Angell:

WALKSacramento is pleased to offer comments on the draft Rancho Cordova General Plan EIR.

The growth in Rancho Cordova will clearly have significant traffic and air quality impacts. The impacts can be partially mitigated by fully completing the street network with pedestrian and bicycle facilities. The EIR should analyze the General Plan with a circulation element that assumes a complete network for bicycles and pedestrians and a resulting increased mode share for walking and biking and reduced share for motor vehicle trips.

Literature shows that communities with safe, complete networks for walking and biking have many more people who use walking and biking for short trips. We would be happy to supply literature if needed to support the EIR document. We also encourage you to utilize Sacramento Area Council of Governments' modeling for this type of project to assist in estimating it's air pollution emission reductions and traffic reductions. 7-1

In order to successfully complete the street network and mitigate the impacts to air quality and circulation, we recommend the following revisions and additions to the Circulation Element's goals, policies, and actions.

1. Goal C.1: *Develop a roadway system that accommodates future land uses at the City's desired level of service, provides multiple options for travel routes, protects residential areas from excessive traffic, coexists with other travel modes, and contributes to the quality of the City's residential, commercial, office, and industrial areas.* 7-2

Letter 7 Continued

We recommend adding a policy and action that addresses gaps in the pedestrian network. For example, in the Stone Creek development, Navigator Elementary School is planning to open in the fall of 2006 and there are already many families living within a quarter mile. Yet North of the school is undeveloped property without sidewalks. If the brunt of new sidewalk construction is on the developer or school and noncontiguous construction is allowed to occur, the City must provide a short-term solution to address such system gaps. For example, the City could or require a developer to lay a simple, affordable, and temporary asphalt pathway to link existing sidewalks. 7-2 cont.

2. Policy C.1.2: *Seek to maintain operations on all roadways and intersections at Level of Service D or better at all times, including peak travel times, unless maintaining this Level of Service would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals…* and C.1.3: *Recognize that regional traffic beyond the City's control…will make it infeasible to achieve the City's Level of Service on all roadways…*

   WALKSacramento supports the policies related to Level of Service (LOS), but encourages the adoption of an additional policy that was recommended by the Sacramento Metropolitan Air Quality Management District in their April 21st General Plan comments. We offer slightly different language.

   "Should the City decide that roadway widening is feasible and desirable, it will fulfill its commitment to complete streets along that segment or intersection by incorporating all unfunded bicycle and pedestrian projects within ¼ mile of the roadway into the improvement plan for the road segment. Unfunded projects shall include, but not necessarily be limited to infrastructure identified in an adopted Bikeway Master Plan or Pedestrian Master Plan. The City shall fund all identified bicycle and pedestrian projects prior to allocating funds for the roadway project." 7-3

   This policy will assure that as roadways are improved they are retrofitted to include sidewalks, bike lanes, and safe crossings.

   In conjunction with revising LOS policies, we ask that the City of Rancho Cordova develop and adopt a multi-modal LOS policy that includes bicycles, transit, and pedestrians. To adopt such a policy would place Rancho Cordova at the forefront of progressive transportation policy.

3. Goal C.2: *Establish an extensive, world-class pedestrian and bicycle network that is a safe and attractive option for local or regional trips or* 7-4

2

Letter 7 Continued

recreation and that connects to the City's neighborhoods, parks and schools, employment areas, and retail centers.

Safe, convenient pedestrian crossings are critical on multi-lane roadways. We strongly recommend adding a policy to provide safe pedestrian crossings within reasonable walking distance along all of Rancho Cordova's roadways, and a corresponding action to prepare and adopt crossing standards that address curb ramps, crosswalks, pedestrian refuge islands, signalization and timing, and mid-block crossings. This is a major issue and deserves a separate section in the Safety Element, similar to the section on Traffic and Pedestrian Accidents at At-Grade Railroad Crossings. 7-4 cont.

We also recommend adding a policy under Goal C.2 that states "The City will work toward complete streets that serve all users by improving conditions of walking and bicycling whenever a roadway project is completed." If the pedestrian and bicycle network are to become "world-class," then improvements need to made through ongoing routine accommodation, with support from occasional grants.

4. Policy C.2.4: *Provide sidewalks throughout the City. Minimum widths for sidewalks are shown below, but these may be adjusted…Meandering sidewalks are discouraged…*

   For the residential/industrial street classification, WALKSacramento supports 5 foot sidewalk width only if separated from the roadway by a landscaped buffer. If the sidewalk is attached, we strongly recommend a 6 foot width minimum. We prefer separated sidewalks and vertical curbs to help create a safe, enjoyable walking environment. We support the statement discouraging meandering sidewalks. 7-5

5. Policy C.2.8: *Promote bicycling and walking as a safe and attractive activity. Educate all road users to share the road and interact safely.*

   We recommend adding an action declaring that the City find a way to fund at least one crossing guard at each elementary school in Rancho Cordova. Crossing guards have been the number one improvement desired by parents of school-aged children at all of the elementary schools we have worked at in the Sacramento region. Unfortunately, they are hard to fund because there are no laws or provisions for funding them in our region. A program that finds a way to provide crossing guards would be a great asset to the City's safety goals, would help build the image of the City's schools, and create an environment where its youngest members lead healthy lives. 7-6

3

Letter 7 Continued

Thank you for your consideration of these comments and recommendations. If you have questions or need additional information, please contact Scott Clark or me at (916) 446-9255 or via email at sclark@walksacramento.org or ageraghty@walksacramento.org.

Sincerely,

Anne Geraghty
Executive Director

CC: Rich Bell, Active Living by Design
Tracy Canfield, Sacramento Regional Transit
Teri Duarte, Sacramento County Department of Health
Rachel DuBose, Sacramento Metro Air Quality Management District
Rebecca Garrison, 50 Corridor TMA
Bruce Griesenbeck, SACOG
Walt Seifert, Sacramento Area Bicycle Advocates (SABA)
Sharon Sprowls, Odyssey
Paul Zykofsky, Local Government Commission

4

Letter 7Anne Geraghty, WALKSacramento

Response 7-1: Draft EIR Section 4.6 (Air Quality) addresses the air quality impacts of the proposed General Plan and includes air pollutant emission estimates. The Draft EIR analysis takes into account proposed General Plan provisions for improved pedestrian and bicycle use and facilities (see Draft EIR Figures 3.0-20 and 3.0-21).

Response 7-2: The commenter's statements and input regarding the Circulation Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR, and therefore no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response 7-3: The commenter's statements and input regarding the Circulation Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response 7-4: The commenter's statements and input regarding the Circulation Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response 7-5: The commenter's statements and input regarding the Circulation Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Response 7-6: The commenter's statements and input regarding the Circulation Element are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Letter 8

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May 15, 2006

Ms. Pam Johns
General Plan Manager
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova, CA 95670

Mr. Pat Angell
Environmental Manager
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova CA 95670

Re: Comments on Rancho Cordova General Plan and Draft EIR.

Dear Ms. Johns and Mr. Angell:

This letter comes on behalf of Habitat 2020 and the Environmental Council of Sacramento ("ECOS"), to provide comments on the City's proposed general plan and its Draft Environmental Impact Report for that document.

Habitat 2020 is a coalition of conservation organizations whose membership includes Sacramento Audubon Society, Sierra Club Mother Lode Chapter, Friends of the Swainson's Hawk, California Native Plant Society, Save the American River Association, Sacramento Urban Creeks Council, and ECOS. Habitat 2020 was formed in 1997, and its mission is to protect and preserve the lands and waters where Sacramento County's wildlife and native plants live, including the habitats and agricultural lands north of Galt along the Cosumnes River corridor. Habitat 2020 also serves as the ECOS habitat committee.

ECOS is a coalition of environmental and civic organizations with a combined membership of more than 12,000 citizens throughout the Sacramento region. ECOS supports coordinated land use and transportation planning that discourages urban sprawl and that encourages preservation and enhancement of Sacramento County's remaining habitats and open spaces.

As the following comments note, ECOS and Habitat 2020 are concerned that the City's proposed general plan lacks meaningful protection to sensitive natural resources that exist within the City's identified planning area. The general plan's build out scenario also appears to lack adequate commitments to mitigate already congested traffic patterns in the City and the Highway 50 corridor, and proposes development on a scale that substantially exceeds allowable air quality standards and identified, available water supply sources. For these reasons, the proposed general plan and the Draft EIR should be revised accordingly and recirculated for public review and comment before adoption by the City. 8-1

Letter 8 Continued

I. RENEWED REQUEST FOR EXTENSION OF EIR COMMENT PERIOD.

As an initial matter we request an extension of the time for public review and comment on the Draft EIR and general plan. Under CEQA, even a complex draft EIR is not supposed to exceed 250 pages in length.[1] CEQA's *minimum* time for circulating an EIR for a project that has state-agency involvement, such as this one, is 45 days.[2] Despite this minimum, CEQA requires lead agencies to "provide adequate time for other public agencies and members of the public to review and comment on a draft EIR . . . that it has prepared."[3]

The Draft EIR for the City's general plan, with appendices, exceeds 1,000 pages in length, or more that 4 times CEQA's page limit for complex EIRs. While it is true that the City did grant a two-week time extension for comments, that extension was necessitated by the fact that the documents that were originally circulated for review by the public and responsible and trustee agencies were incomplete. In other words, no actual extension of the 45-day comment has been granted from the time at which the entire text of the documents was made publicly available. 8-2

Absent a true, and substantial, extension of the comment period (at least 30 days) to allow for meaningful public and agency comment, the City has failed to meet the spirit or the letter of CEQA by not providing *adequate* time for fair and full consideration of the City's EIR, especially where that document is four times longer than the page limits established in the CEQA Guidelines.[4]

II. THE CITY'S PROPOSED GENERAL PLAN DOES NOT CONTAIN SUFFICIENTLY CLEAR AND MANDATORY POLICIES REGARDING THE ACQUISITION, PRESERVATION, AND PROTECTION OF SENSITIVE SPECIES AND HABITATS.

A. ONLY GENERAL PLAN POLICIES THAT ARE CLEAR AND MANDATORY ARE ENFORCEABLE.

California's Planning and Zoning Law requires that every city have a general plan.[5] A general plan's purpose is to set forth an "integrated, internally consistent and compatible statement of policies" that will guide "the physical development of the . . . city, and of any land outside its boundaries" which bears a relation to the city's planning.[6]

California's Supreme Court has referred to the general plan as the "constitution for all future developments" within a city, because any subordinate land use decision must be consistent with the general plan or be declared invalid.[7] The California Supreme Court has consistently rejected

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[1] CEQA Guidelines, § 15141.
[2] CEQA Guidelines, § 15105, subd. (a).
[3] CEQA Guidelines, § 15203.
[4] CEQA Guidelines, § 15203.
[5] Gov. Code, § 65300.
[6] Gov. Code, § 65300, 65301.
[7] *Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531; *Citizens of Goleta Valley v. board of Supervisors v. Board of Supervisors* (1990) 52 Cal.3d 553.

Letter 8 Continued

interpretations of general plan policies that would reduce the general plan, as a practical matter, to little more than an "an interesting study."[8] However, the public can only directly hold a city or county legally responsible for general plan policies that are stated in *clear* and *mandatory* language (i.e., using the words "will" or "shall," rather than "may" or "should").[9]

B. THE PROPOSED RANCHO CORDOVA GENERAL PLAN DOES NOT CONTAIN ADEQUATELY CLEAR AND MANDATORY POLICIES REGARDING NATURAL RESOURCE PROTECTION AND CONSERVATION.

The most notable feature of the City of Rancho Cordova's proposed general plan is that practically none of its proposed policies involving protection of open space, or sensitive species and their habitats, are stated in 1) clear and 2) mandatory language. None of the general plan's policies state that "The City will...," or "The City shall...." In many instances the policies (and their implementing actions) state that some sort of ordinance or program should be implemented, but provide no clear guidance as to what the measure of success for such ordinances or programs will be. Instead, the policies 1) avoid commitments to defined, quantifiable and measurable outcomes, or 2) include ambiguous words and phrases that render the Policy's meaning subject to myriad interpretations. 8-3

Just as an example, the general plan's first two natural resources policies are recited below, followed by questions demonstrating the inherent ambiguity in the policy, as proposed, and then a possible example of how the policy might be modified to be an *enforceable* statement of how the City *will* treat sensitive species and their habitats in subordinate land use decisions.[10] The same or similar criticisms apply to all of the general plan's natural resources policies.

- **Policy NR.1.1** - Incorporate large and interconnected wildlife corridors in new development areas to provide ample space for animal movement.

What area is sufficiently "large" or "interconnected" to satisfy the terms of this policy? Who judges what constitutes "ample space" for animal movement? And why is habitat only incorporated as an adjunct to new development? At a minimum, it would seem that the location, configuration, and dimensions of such "corridors," and permissible activities therein, should be approved by the relevant, trustee agency, the California Department of Fish and Game ("CDFG"), as being adequate to *actually* serve as appropriate habitat for animals and birds, or specific special status species. 8-4

> **Possible revision**: The City shall not approve projects within the Planning Area where substantial evidence indicates that the project may substantially reduce the number or restrict the range of the wildlife species listed on general plan table

[8] *DeVita v. County of Napa* (1995) 9 Cal.4th 763, 772; *Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 540.
[9] *Families Unafraid to Uphold Rural El Dorado County v. County of El Dorado* (1998) 62 Cal.App.4th 1332, 1341-1342 ("*FUTURE*").
[10] For consideration, a distilled listing of all of the General Plan's Natural Resources Policies is attached to this letter as Exhibit A.

Letter 8 Continued

NR-1 (Special Status Species Occurring Within the Rancho Cordova Planning Area). within the City's Planning Area. 8-4 cont.

- **Policy NR.1.2** - Conserve Swainson's hawk habitat.

What does "conserve" mean? And, if it means "protect from development," is "conserving" one acre in the city enough? Or one-hundred acres? What is the metric to determine how much habitat is to be "conserved"? Does the land have to be conserved within the Planning Area?

> **Possible revision**: The City shall mitigate for the loss of Swainson's hawk foraging habitat caused by the direct and cumulative effects of the City's. expansion. For any development project that would convert open-space, agricultural or similar lands to urban uses, the City shall minimally require a permanent dedication of Swainson's Hawk foraging habitat on an acre-by-acre basis, in proximity to nesting territories affected by the City's development, and an endowment sufficient to manage the property for such purposes in perpetuity. Such dedications and endowments shall not be accepted as mitigation unless they are first reviewed and approved by the California Department of Fish and Game, and must be made before the issuance of grading permits or any other project-related land-disturbance is authorized by the City.[11] 8-5

We do wish to make it clear that this criticism is *not* a rejection of the many of the laudable, concepts that the City has attempted to address in the general plan's natural resource policies. The general plan proposes natural resources policies that "promote" environmental education, "discourage" the planting of invasive plants, "coordinate" with local environmental organizations on land use decisions, and "encourage" the use of treated water for golf course and landscape irrigation. Many of these policy goals are ones that Habitat 2020 and ECOS support, including the concepts that Swainson's hawk habitat should be conserved, and that environmental groups, such as the Urban Creeks Council, should be consulted regarding the preservation of creeks in the City.[12] 8-6

However, the general plan's failure to include any *enforceable* natural resources policies leaves it highly unlikely that this document will serve its statutory purpose and function as a "constitution for future development," with regard to those resources.[13] Absent revision of the general plan to give "teeth" to at least some of its natural resources protection provisions by making them 1)

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[11] On March 27, 2006, James P. Pachl, representing Sierra Club – Mother Lode Chapter and Friends of the Swainson's Hawk, submitted to the City a comment letter on the proposed "Preserve at Sunridge" project. Mr. Pachl's letter proposes a revised mitigation measure 4.9.1a for that project which contains a detailed prescription for appropriate Swainson's Hawk mitigation. Mr. Pachl's letter is attached as Appendix C to this letter, and is hereby incorporated in its entirety to the extent that his observations in that letter apply to Swainson's Hawk and vernal pool resources not only located at the "Preserve at Sunridge" project site, but found throughout the City's expansive, proposed planning area.

[12] General Plan Policies NR.1.2 and NR.3.1.

[13] *Lesher*, *supra*, 52 Cal.3d 531; *Citizens of Goleta Valley*, *supra*, 52 Cal.3d 553.

Letter 8 Continued

clear, and 2) mandatory (*i.e.*, direct and quantifiable statements of what the City "shall" or "shall not" do in making land use decisions), none of the presently proposed policies appear to *prevent* private or public action that is contrary to the City's "promotion," "coordination," or "encouragement," of protection of special status species and their habitats. 8-6 cont.

III. THE GENERAL PLAN LACKS A LEGALLY ADEQUATE OPEN SPACE "ACTION PROGRAM."

Another important part of the Rancho Cordova general plan that affects how wildlife and habitat will be managed within the Planning Area is the general plan's Open Space Parks and Trails element. Under the Planning and Zoning Law the open space element of a general plan must meet a variety of enumerated statutory requirements.[14] The Legislature has stated that, in light of anticipated population increases in cities across the state, an open space element must contain "definite plans" for preserving such areas in order to affirmatively guide decisions about where urbanization should occur:

> the anticipated increase in the population of the state demands that cities, counties, and the state at the earliest possible date make *definite* plans for the preservation of valuable open-space land and take *positive action* to carry out such plans by the adoption and strict administration of laws, ordinances, rules and regulations *as authorized by this chapter* or by other appropriate methods.[15]

8-7

In order to achieve the goals of this policy, the Planning and Zoning law mandates that a general plan's open space element must "contain an *action program* consisting of specific programs which the legislative body intends to pursue in implementing its open space plan."[16] Once the open space element's action program is adopted, "any action" in which open-space land may be "acquired or disposed of or its use restricted or regulated . . . must be consistent with" that program in the general plan, and no building permit, subdivision map or open space zoning ordinance may be adopted, unless such approvals or activities are consistent with the City's open space plan.[17] The government code also indicates that, an adequate open space plan must contain "conservation measures" based on an actual inventory of open space resources that may be affected by the plan.[18]

With regard to all forms of open space other than parks, the City's proposed general plan fails to contain any "specific programs" that the City will implement to preserve open space, as required by the Planning and Zoning Law.[19] Instead, the general plan contains a policy and action item,

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[14] Gov. Code, § 65560 et. seq.
[15] Gov. Code, § 65561, subd. (c).
[16] Gov. Code, § 65564.
[17] Gov. Code, §§ 65566-65567.
[18] Gov. Code, § 65563, subd. (b).
[19] Gov. Code, § 65564. The Open Space Parks and Trails element of the general plan *almost* begins to set such standards for city parks, by, for example, stating in mutually inconsistent sections that developers will be required to dedicate either 1.75 or 5 acres of parkland for each 1,000 residents in a development project. (*Compare* General Plan, Open Space Element Action

Letter 8 Continued

that unlawfully *defers* the development of the "action program" mandated by the Planning and Zoning Law until *after* the general plan is adopted:

> **Policy OSPT.2.2** - Create a plan for identifying and maintaining open space.
>
> • **Action OSPT.2.2.1** - Adopt a comprehensive Open Space Preservation Action Plan, which clearly defines the City's open space vision and provides clear direction for the inclusion of open space lands within new development.

The Planning and Zoning Law recognizes that, due directly to population growth pressure, open space *will not* be adequately protected if a specific and defined plan for its conservation is not clearly spelled out *in* the document that serves as the "constitution" for the city's development: its general plan. The City's proposed general plan would "grow" the city from a population of 50,000 to 300,000 in the year 2050, but defers the formulation of the plans for acquiring and protecting open space until after the general plan is adopted. The failure to include the mandated "action program" for identifying and protecting open space is not consistent with the Planning and Zoning Law, and effectively precludes implementation of the Legislature's mandates that all transactions, regulations, or permits involving open space lands comply with the action program set forth *in* the City's general plan open space element.[20] 8-7 cont.

Before it can lawfully adopt its proposed general plan, the City must formulate an open space element that contains a substantive plan for the future, so that urban development does not simply pave over important open space resources before anybody realizes what has been lost.

IV. THE DRAFT EIR MUST BE RECIRCULATED, IN LIGHT OF THE SIGNIFICANT, NEW INFORMATION THAT MUST BE ADDED TO THE PROPOSED GENERAL PLAN'S OPEN SPACE ELEMENT.

In addition, once the general plan's Open Space element is amended to include the statutorily mandated "action program" for identifying and protecting open space, the City's Draft EIR for the general plan will have to also be revised and recirculated, so that the public and interested agencies have the proper opportunity to review and comment on this critical aspect of the City's general plan.

In *Mountain Lion Coalition v. California Fish and Game Commission*, the Court of Appeal was faced with a similar situation regarding a proposal to authorize the so-called "sport" hunting of the state's mountain lions.[21] In *Mountain Lion Coalition*, the lead agency, the Fish and Game Commission, did not develop or release important, relevant information regarding the proposed hunting season's cumulative impacts on mountain lion populations until *after* the comment period on its Draft EIR had closed. Instead of revising its Draft EIR to include the new 8-8

OSPT.1.1.1 [5 acres of parkland per 1,000 residents], *with* General Plan Open Space Element Action OSPT.2.1.2 [1.75 acres of parkland per 1,000 residents].) The general plan cannot be lawfully adopted until the direct inconsistency in these sections is resolved.

[20] Gov. Code, § 65564.

[21] *Mountain Lion Coalition v. California Fish and Game Comm.* (1989) 214 Cal.App.3d 1043.

Letter 8 Continued

information, and then recirculating that revised analysis for public review and comment, the Fish and Game Commission simply published a Final EIR with its response to comments, added the new information it had developed on cumulative effects to its Final EIR, and then approved the proposed hunting season.

On appellate review, the Court ruled that the Fish and Game Commission's process of adding substantial new information to the EIR had violated CEQA's public participation purposes and mandate, and ordered the agency to rescind its decision, and recirculate its substantially revised EIR for public review and comment:

> The cumulative impact analysis contained in the final [EIR] *has never been subjected to public review and criticism*. If we were to allow the deficient analysis in the draft [EIR] to be *bolstered* by a document *that was never circulated for public comment*, we would not only be allowing appellants to follow a procedure which deviated substantially from the terms of the writ, but we would be subverting the important public purposes of CEQA. Only at the stage when the draft [EIR] is circulated can the public and outside agencies have the opportunity to analyze a proposal and submit comment. No such right exists upon issuance of a final [EIR] unless the project is substantially modified or new information becomes available. (See Cal. Code Regs., tit. 14, § 15162.) To evaluate the draft [EIR] in conjunction with the final [EIR] in this case would only countenance the practice of releasing a report for public consumption that hedges on important environmental issues while deferring a more detailed analysis to the final [EIR] that is insulated from public review.[22]

8-8 cont.

The appellate court's ruling on this point in *Mountain Lion Coalition* was subsequently cited with approval and applied by the California Supreme Court in 1993, in *Laurel Heights Improvement Association v. Regents of the University of California* ("*Laurel Heights II*"):

> recirculation is required . . . when the new information added to an EIR discloses . . . that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless (*Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043, . . .).[23]

In the aftermath of the *Mountain Lion Coalition* and *Laurel Heights II* decisions, California's Resources Agency amended its guideline on recirculation of EIRs to embrace the courts' holding:

> A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review . . . . "Significant new information" requiring recirculation include[s], for example, a disclosure showing that: . . . The draft EIR was so

[22] *Mountain Lion Coalition*, *supra*, 214 Cal.App.3d at p. 1052.
[23] *Laurel Heights Improvement Assn., Inc. v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1130.

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> fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.[24]

The considerations that required recirculation of the EIR in *Mountain Lion Coalition*, and that led to the Supreme Court's confirmation of *Mountain Lion Coalition*'s guidance in *Laurel Height II*, are analogous to the City's failure to include the required open space "action program" in the general plan that it has circulated for public review. In this case, the EIR for the City's general plan does not (and cannot) evaluate how the mandated open space action program may or may not ameliorate the effects of the massive urban expansion proposed in the City's general plan.

8-8 cont.

The addition of the required open space "action program" after the close of the EIR comment period might satisfy the Planning and Zoning Law's content requirements for an open space element. However, such action would constitute reversible error under CEQA, because failing to provide this information during the public comment period would constitute "noncompliance with the information disclosure provisions of [CEQA] which precludes relevant information from being presented to the public agency" by the concerned public and by other agencies that have jurisdiction over resources affected by the City's proposed general plan.[25] The effect of such an addition after the close of public comment would result in a situation analogous to that in the *Mountain Lion Coalition* case: significant new information will have been added to the project that renders the Draft EIR's analysis and conclusions "so fundamentally and basically inadequate and conclusory in nature, that meaningful public comment and review were precluded."[26]

V. THE GENERAL PLAN ACKNOWLEDGES THE EXISTENCE OF NUMEROUS SPECIAL STATUS SPECIES IN ITS PLANNING AREA, BUT CONTAINS NO NATURAL RESOURCE POLICIES FOR THEIR PROTECTION.

In its introductory pages, the general plan's Natural Resources section notes that the expansive Planning Area that the City has staked out contains "unique an valuable habitats" that host a list of thirty-seven "special-status species that occur within the Rancho Cordova Planning Area." Some of these species, such as the Sacramento orcutt grass, are found all but exclusively within the City's claimed planning area:

8-9

> A variety of unique and valuable habitats are found within the Planning Area, including, but not limited to, oak and cottonwood woodlands, various grasslands, vernal pool areas, and open water and rivers. The habitats of the Planning Area contain numerous special status plant and animal species. A comprehensive list of the habitats and species in the Planning Area is provided in the Background Report that accompanies the General Plan.

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[24] CEQA Guidelines, § 15088.5, subd. (a)(4), *citing Mountain Lion Coalition*, *supra*, 214 Cal.App.3d 1043.
[25] Pub. Resources Code, § 21005, subd. (a).
[26] CEQA Guidelines, § 15088.5, subd. (a)(4), *citing Mountain Lion Coalition*, *supra*, 214 Cal.App.3d 1043.

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> Table NR-1 at the end of this Element includes a current list of special-status species that occur within the Rancho Cordova Planning Area.[27]

Despite its recognition and enumeration of special status species in the Planning Area, the general plan's Natural Resource element does not contain policies that reference this list, or otherwise directly state how the City will protect and conserve these species. In fact, the only specific species on Table NR-1 that appears to be mentioned in the general plan's natural resources policies is the Swainson's Hawk.[28] And, even in that case, the general plan's policy of "[c]onserv[ing] Swainson's hawk habitat," is too vague to have any meaningful force or effect.[29] 8-9 cont.

Having formally recognized that at least thirty-seven special status plant and animals exist within the City's planning area, the general plan should contain clear and enforceable policies that explain how these sensitive species and their habitats will be protected as the City expands to a proposed population of over 300,000 people by the year 2050.

VI. THE MITIGATION MEASURES PROPOSED IN THE DRAFT EIR FAIL TO MEANINGFULLY MITIGATE OR AVOID IMPACTS TO SENSITIVE SPECIES IN THE PLANNING AREA.

One of CEQA's most fundamental purposes is to ensure that agencies investigate and incorporate feasible mitigation measures or alternatives for a project's potentially significant adverse environmental effects when taking discretionary action, which includes the formulation and adoption of a general plan.[30] A "mitigation measure" is sufficient to meet CEQA's standards if 1) it modifies the project or its location in such a way that the identified impact will be clearly prevented or avoided; or, 2) measurable performance standards that would clearly avoid the project impacts are established, and the mitigation measure(s) to be implemented are clearly capable of meeting that standard.[31] 8-10

The Draft EIR for the general plan asserts that a wide range of general plan's policies provide "mitigation" for the general plan's impacts to sensitive species and their habitats. However, none of the policies in the general plan constitute CEQA "mitigation," because none of them establishes measurable performance standards or is sufficiently 1) clear in meaning, or 2) mandatory in application, to decide whether the policy will, in fact, "mitigate" the general plan's impacts to sensitive wildlife and habitats within the Planning Area.[32]

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[27] General Plan, Natural Resources Element at p. 5.
[28] General Plan Policy NR.1.2.
[29] See discussion at Part II.B, *supra*.
[30] Pub. Resources Code, § 21002, 21002.1.
[31] *Sacramento Old City Association v. City Council* (1991) 229 Cal.App.3d 1011, 1019-1022 ("*SOCA*").
[32] CEQA Guidelines, § 15370 (mitigation means avoiding impact; minimizing impact by limiting its degree or magnitude; rectifying the impact through reparation, rehabilitation or restoration; preservation; or, compensation). As explained above, the General Plan's natural resource policies are stated in such vague and unenforceable language, that it is far from clear that any of those policies will in fact constitute actions meeting the foregoing definition.

Letter 8 Continued

Moreover, the EIR's assertion that the policies and implementing actions in the proposed general plan will purportedly mitigate the project's impacts is a conundrum.[33] In this case, the CEQA "project" that is being analyzed *is* the collection of policies and implementing actions that form the City's general plan. The impacts identified in the EIR are the impacts caused by those policies and actions. Thus, it cannot be said that these same policies and actions mitigate the very same potentially significant, adverse effects that their adoption may cause. 8-10 cont.

The Draft EIR does propose five additional mitigation requirements to be added to the general plan, Mitigation Measures MM 4.10.1a through e. The Draft EIR claims that these mitigation measures could mitigate the general plan's impacts to sensitive species and their habitats by 1) requiring biological studies and evaluations before the approval of individual projects; 2) requiring "mitigation" for project level impacts to sensitive species; 3) "encouraging" habitat preserves to be located next to each other; 4) adopting a future noxious weed ordinance; and 5) requiring that, to the extent feasible, stormwater discharge not be routed into wetlands.[34]

Unfortunately, the proposed mitigation measures suffer from the same infirmities and ambiguities as the general plan policies that they claim to mitigate:

- The requirement in Mitigation Measure 4.10.1a of conducting biological studies for individual projects may help inform decisionmakers of what they are about to destroy, but such studies are, essentially, inventories, and of themselves, offer no substantive protection to sensitive species or their habitats.
- The requirement in Mitigation Measure 4.10.1b of "mitigati[ng] for impacts to [sensitive] species" as a way to mitigate for impacts to sensitive species is circular, and adds no meaningful substance to the general plan's requirements. 8-11
- The requirement in Mitigation Measure 4.10.1c of "encouraging" habitat preserves to be located next to each other does not mean that it will actually happen.
- The requirement in Mitigation Measure 4.10.1d of adopting a noxious weed ordinance contains no measurable standards and is not sufficiently defined in the EIR to make any determination of whether such an ordinance, once adopted, can or will mitigate impacts to special status species.
- The requirement in Mitigation Measure 4.10.1e directing that post-development surface runoff flows into wetlands should mimic pre- existing flows to the "extent feasible," still would allow such impacts to be incurred upon a finding that avoiding such impacts is not "feasible."

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[33] CEQA Guidelines, §§ 15124,15378 (project is the "whole" of the activity which is being approved; CEQA Guidelines, §§ 15126, 15126.2 (EIR must contain discussion of significant, adverse environmental impacts of proposed project).
[34] EIR Mitigation Measures MM 4.10.1a - MM4.10.1 e.

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VII. THE DRAFT EIR FAILS TO PROPOSE OR CONSIDER POTENTIAL MITIGATION MEASURES THAT COULD FEASIBLY MITIGATE THE PROJECT'S IMPACTS ON SENSITIVE SPECIES AND THEIR HABITATS.

Given the unenforceable nature of the general plan's natural resources policies, the Draft EIR reaches the unremarkable conclusion that identified impacts to a broad range of biological resources are considered "significant and unavoidable" even with all feasible mitigation measures or alternatives implemented.

In fact, of the eight categories of biological resources impacts that the EIR identifies, it concludes that impacts to all but one of those categories are "significant and unavoidable."[35] The only biological resource impact which is rated as having "less than significant" adverse effects is Impact 4.10.7 – which finds that the project will have "no impact" due to conflicts with "provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any adopted biological resources recovery or conservation plan of any Federal or State agency."[36] The EIR reaches this conclusion based on the fact that no such plans exist *yet* within the City's planning area.

The EIR does note, however, that a habitat conservation plan ("HCP") that would cover the City's Planning Area *is* presently being prepared by the United States Fish & Wildlife Service, and that the City is actively involved in that planning process, and intends to participate in that HCP when it is completed.[37] The EIR also acknowledges that "the USFWS is currently finalizing a Vernal Pool Recovery Plan that includes a portion of the Planning Area in its scope" and that this plan would protect 33 sensitive species "that occur exclusively or primarily within the California and southern Oregon vernal pool ecosystem."[38] 8-12

Under the CEQA Guidelines, *if* a project has the potential to substantially reduce the number or restrict the range of an endangered, rare or threatened species, then the lead agency for the project *must* make a "mandatory finding of significance" for such impacts.[39] However, in 2005, the Resources Agency amended this CEQA Guideline to provide that a mandatory finding of significance for such impacts need not be made if 1) "the project proponent is bound to implement mitigation requirements related to such species and habitat pursuant to an approved habitat conservation plan or natural communities conservation plan," 2) an EIR or EIS was prepared in support of the HCP or NCCP's adoption, and 3) the provisions of the HCP or NCCP require avoidance of the impact, or otherwise preserve, restore, or enhance sufficient habitat to reduce effects for the loss of sensitive species to less than significant levels.[40]

In light of the foregoing, it would appear that the City's Draft EIR has failed to consider a potentially feasible mitigation measure for its general plan that would avoid the need for

[35] Draft EIR, pp. 7.0-9 to 7.0-10.
[36] Draft EIR, p. 4.10-62.
[37] Draft EIR, pp. 4.10-30, 4.10-62.
[38] Draft EIR, p. 4.10-63.
[39] CEQA Guidelines, § 15065.
[40] CEQA Guidelines, § 15065, subd. (b)(2).

Letter 8 Continued

mandatory findings of significance for impacts to sensitive species and their habitats to be made within the City's entire Planning Area. Specifically, the Draft EIR should consider whether the City can and should adopt a general plan policy along the lines of the following:

> The City shall not approve any projects within the City Limits or the Planning Area that would convert open space, agricultural and other non-urban landscapes to urban uses unless and until an approved HCP or NCCP meeting the requirements of CEQA Guidelines section 15065, subdivision (b)(2), is adopted for the Planning Area.

8-12 cont.

Arguably, the formulation and inclusion of such a policy in the City's general plan could allow the City to make a finding that impacts to special status species covered by such an HCP or NCCP have been mitigated to "less-than-significant" levels under section 15065, because 1) under the general plan, no impacts to these species or their habitats could be permitted until after an HCP or NCCP meeting the CEQA Guidelines' requirements has been approved, and 2) after such an HCP or NCCP has been adopted, the CEQA Guidelines expressly provide that compliance with the that HCP or NCCP constitutes mitigation to "less-than-significant" levels.

It should also be noted that the potential feasibility of such a measure is demonstrated by the similar mitigation measures already incorporated into the City's Draft EIR with regard to other environmental resources. For example, Impact 4.9.4 in the EIR notes that the general plan's proposed development patterns could result in a shortage of over 50,000 acre-feet/year of water.[41] In order to mitigate this acknowledged and substantial shortage of available water to serve full build out under the proposed general plan, the EIR proposes to add Mitigation Measure MM 4.9.4, which requires, among other things, that no development be approved until it is demonstrated that "[a]n assured water supply and delivery system shall be available at the time of project approval."[42] The inclusion of this mitigation measure for water supply demonstrates that the City understands and accepts the fact that moratoria on development approvals until certain planning requirements are met is a valid method of mitigating the general plan's potentially significant, adverse environmental effects.

8-13

VIII. THE DRAFT EIR IS INFORMATIONALLY INADEQUATE WITH REGARD TO WHAT INFORMATION IS ACTUALLY INCORPORATED FROM OTHER EIRS, AND HOW SUCH UNIDENTIFIED INFORMATION IS RELEVANT TO THE DRAFT EIR'S ANALYSIS.

The Draft EIR claims that it "utilizes technical information and analyses from previously prepared EIRs that are relevant to the consideration of environmental effects of the proposed General Plan," and that, "[i]n addition to materials cited," several, enumerated EIRs "have been utilized in" the City's Draft EIR for its general plan.[43]

8-14

The CEQA Guidelines generally allow the "incorporation by reference" of other documents into an EIR. But the Guidelines require that any incorporated part of such referenced documents "be

[41] Draft EIR, p. 4.9-43, and Table 4.9-7, p. 4.9-44 to 4.9-45.
[42] Draft EIR, p. 4.9-56.
[43] Draft EIR, p. 4.1-10.

Letter 8 Continued

briefly summarized where possible, or briefly described if the data or information cannot be summarized," and that "[t]he relationship between the incorporated part of the referenced document and the EIR shall be described."[44]

In this case, the Draft EIR lists seven other EIRs as having purportedly been "utilized" in the preparation of the Draft EIR for the City's proposed general plan, but the Draft EIR fails to summarize what data or information from those other EIRs is 1) relevant to the Draft EIR's analysis, or 2) the relationship between the unidentified "incorporated part" of those documents and the analysis and conclusions in the City's general plan Draft EIR.

The Draft EIR asserts that the City has copies of these seven additional EIRs on file for public review. However, this offer of inspection is meaningless as a practical matter, where the public is provided with no information about what part of those EIR's is actually relevant to or considered an incorporated part of the Draft EIR's analysis.

As noted above, a violation of CEQA's information disclosure provisions that precludes relevant information from being presented to the public agency constitutes a prejudicial abuse of discretion, regardless of whether a different outcome would have resulted, had the relevant information been made available.[45] In this case, the Draft EIR violates this provision, because there is no way for the public or the decisionmakers to know what parts of these seven other EIRs are incorporated in, or even considered relevant to, the Draft EIR's analysis and conclusions. 8-14 cont.

These shortcomings are particularly notable in the Draft EIR's Hydrology and Water Quality analysis. The Draft EIR topically lists numerous, significant and unavoidable impacts from these prior EIRs, but provides absolutely no summary of the facts in those EIRs related to these findings, or how those findings are relevant to the Draft EIR's analysis and conclusions.[46] Perhaps more importantly, the Draft EIR, after acknowledging this wide range of unmitigated impacts from prior projects, contains absolutely no discussion or analysis of whether any mitigation measures or alternatives might be incorporated into its proposed general plan to reduce or avoid the identified, adverse effects, which is CEQA's most basic purpose.[47]

IX. LACK OF ANY RECOGNIZED WATER SUPPLY FOR NATURAL RESOURCES

The Draft EIR's table that allocates water supply "zeroes-out" all allocations of water for "natural resources" areas, which comprise over 11,000 acres of the planning area.[48] Yet, the Draft EIR allocates over 14,539 afy of water to open space and parks, which comprise just over 4,000 acres of the planning area.[49] In fact, the "demand factor" for supplying adequate water for 8-15

[44] CEQA Guidelines, § 15150, subd. (c).
[45] Pub. Resources Code, § 21005.
[46] Draft EIR, p. 4.9-50.
[47] Pub. Resources Code, § 21002, 21002.1.
[48] Draft EIR, Table 4.9-6, at p. 4.9-43.
[49] Draft EIR, Table 4.9-6, at p. 4.9-43.

Letter 8 Continued

open space areas is one of the largest on the chart.[50] It would seem that maintaining "natural resource" areas in their desired state would also require some allocation of water by the City, especially where the land use maps on the general plan predominantly propose to surround these areas with residential and other urban development. Is it clear that no water will have to be delivered to these areas from local supplies, as the expansive development proposed by the general plan is implemented? 8-15 cont.

X. FAILURE TO IDENTIFY, DISCUSS OR ANALYZE MITIGATION MEASURES OR ALTERNATIVES REGARDING WATER SUPPLY IMPACTS.

Another concern with the Draft EIR's water supply analysis is that it fails to discuss mitigation measures or alternatives that could feasibly reduce or avoid a long list of identified, potentially significant, adverse environmental effects associated with the general plan's acknowledged 50,000+ afy water supply shortfall.

As noted above, the Draft EIR recites numerous findings of "significant and unavoidable" impacts associated with the approval of prior water supply projects that are identified as potential sources of water supply for the City's projected growth to 300,000+ residents.[51] In addition, Table 4.9-8 identifies nineteen additional "related and potential" impacts that may be caused by new water supply projects, water rights transfers and related infrastructure required to serve the general plan's projected growth.[52]

Yet, despite these three pages of identified, potentially significant adverse effects that will be caused by the general plan, not a single mitigation measure is proposed or analyzed for these impacts before the Draft EIR summarily concludes that impacts associated with 1) the general plan's cumulative contribution to impacts of various water supply projects that have already been approved, and 2) securing as-yet unidentified new sources of water to make up for the general plan's 50,000+ afy water supply shortfall, are "significant and unavoidable."[53] 8-16

The Draft EIR does propose one mitigation measure, MM 4.9.4 regarding water supply, but that mitigation measure is narrowly targeted at making sure that the individual project being considered can be supplied with water.[54] Even the Draft EIR reaches the conclusion that

> Implementation of the above proposed General Plan policies and action items and Mitigation Measure **MM 4.9.4** would ensure that the new development under the General Plan would not proceed without verification and determination that an adequate water supply exists. As noted above, it is speculative that additional water supply sources would be available to serve buildout of the entire Planning Area. In addition, the proposed General Plan would contribute to identified significant environmental impacts associated with planned water supply projects

[50] Draft EIR, Table 4.9-6, at p. 4.9-43.
[51] Draft EIR, p. 4.9-50 to 4.9-52.
[52] Draft EIR, Table 4.9-8, at pp. 4.9-50 to 4.9-51.
[53] Draft EIR, p. 4.9-57.
[54] Draft EIR, p. 4.9-56-4.9-57.

Letter 8 Continued

> as well as potential future other water supply sources. Given these conditions, this impact is considered **significant and unavoidable.**[55]

First, it is not correct for the Draft EIR to claim that the policies and implementing actions in the proposed general plan would assist in "reducing water supply impacts," because these policies and implementing actions are a part of the "whole" of the project that is being analyzed, and thus are the policies and actions that are *causing* the identified and acknowledged impacts.[56] In other words, as explained above, it is circular to assert that the activities that constitute a project that is being analyzed under CEQA "mitigate" the impacts of engaging in those activities.[57] 8-16 cont.

Second, the above statement from the Draft EIR concludes that the general plan (including its policies and actions, *and with MM 4.9.4 incorporated*) would contribute to significant effects "associated with planned water supply projects as well as potential future other water supply sources." Accordingly the Draft EIR should, but does not, discuss potential mitigation measures or alternatives that could reduce or avoid water supply impacts (including, perhaps, substantially scaling back the City's expansive planning area) before summarily concluding that such impacts are "significant and unavoidable."

XI. THE GENERAL PLAN AND DRAFT EIR'S PROPOSED LAND USE DEVELOPMENT PATTERNS, PROJECTED POPULATION GROWTH, AND MITIGATION MEASURES ARE BASED ON UNRELIABLE WATER SUPPLY ESTIMATES.

The EIR's acknowledgement of a 50,000+ afy shortfall in water supply after all potential sources of water are exhausted also causes the City's proposed general plan to be internally inconsistent. The general plan calls for expansion of the City from a current population of 50,000 persons to over 300,000 persons in the City's planning area. Yet after considering all identifiable, anticipated sources of water that might be able to serve that growth, the Draft EIR concludes that there is a 50,000+ afy shortfall.[58]

Even the identified shortfall is probably overly optimistic, because the Draft EIR's water demand calculations for the general plan incorporates a 25.6% water demand management factor based on the so-called Water Forum Agreement ("WFA").[59] But the WFA is not binding on any of the signatory parties, and the WFA's provisions have no enforcement mechanism. Accordingly, to the extent that the water demand identified in the EIR has been reduced by reference to provisions in the WFA, such reductions in demand are not reliable. 8-17

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[55] Draft EIR, p. 4.9-57.
[56] CEQA Guidelines, §§ 15124,15378 (project is the "whole" of the activity which is being approved; CEQA Guidelines, §§ 15126, 15126.2 (EIR must contain discussion of significant, adverse environmental impacts of proposed project).
[57] See discussion at footnote 33, *supra*.
[58] Draft EIR, Table 4.9-7, pp. 4.9-44 to 4.9-45.
[59] Draft EIR, Table 4.9-6, p. 4.9-43 to 4.9-44.

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Moreover, as the Draft EIR itself acknowledges, the WFA is based on projected land uses and patterns that were in place in 2000, and bears no relation to the massive urbanization proposed in the City's general plan:

> The WFA *did not* . . . account for new incorporations for the cities of Elk Grove and Rancho Cordova. Rather, the WFA analysis was based on existing land use plans that were available at the time it was prepared (*i.e.*, the County of Sacramento General Plan [1994] and other relevant agency general plans). Since the WFA was adopted in 2000, the cities of Elk Grove and Rancho Cordova have incorporated and pursued development and implementation of long-term land use plans. For [water supply] demands that exceed those accounted for and evaluated in the WFA and EIR, the City may need to consult with regional water purveyors and stakeholders to the WFA (*e.g.*, environmental and business interests) to determine how its proposed water demands fit within the overall regional water supply planning context.[60]

On its own terms, this statement in the EIR admits that the WFA EIR *did not* consider or analyze the water supply impacts associated with the massive urbanization contemplated by the City's proposed general plan, and that any disclosure of such impacts or "consultation" with affected "environmental and business interests" has not yet occurred. In doing so, the City Draft EIR improperly defers disclosure, analysis and mitigation of the water supply impacts associated with its proposed general plan – in violation of CEQA's mandate that the impacts of the "whole" of a CEQA project be disclosed and analyzed before project approval. 8-17 cont.

As stated in the draft EIR: "As noted under Impact 4.9.4, there is currently not adequate existing and planned water supplies identified to serve full buildout of the proposed General Plan (51,089 afy shortfall)."[61] Or, as stated later in the EIR, "it is speculative that additional water supply sources would be available to serve buildout of the entire Planning Area . . . ."[62] In other words, the general plan, as drafted, establishes proposed land use and urbanization patterns for population growth that cannot possibly be supported by any existing or even reasonably anticipated water supply.

The shortfall of water to support the land uses patterns and population growth proposed in the general plan is quite substantial, in light of the fact that total demands for water within the planning area (if development is carried out as proposed in the general plan) is 128,709 afy, but the City can only account, at most, for a *potential* water supply through 2030, of 77,620 acre feet of water.[63] This represents a *40% shortfall* of water supply for build out of the planning area as a "whole," and a *71.5% shortfall* of water supply for the portion of the general plan's planning area that is outside of the City's current limits, if it is assumed, pursuant to the City's commitment to "smart growth" principles, that the City would require full build out within its

[60] Draft EIR, p. 4.9-30 to 4.9-31.
[61] Draft EIR, p. 4.9-62.
[62] Draft EIR, p. 4.9-66.
[63] Draft EIR, Table 4.9-7, p. 4.9-45.

Letter 8 Continued

current city limits, before seeking permission from LAFCo to expand into adjacent, rural landscapes.[64]

In sum, this *substantial* shortfall of identifiable sources of water in the Draft EIR renders the City's proposed general plan assumptions and policies regarding land use and water supply internally inconsistent. The expansive urbanization proposed in the general plan's land use maps, and especially that part in the "planning area" that is beyond the City's existing limits, has no relationship to what can reasonably be expected to occur in the future, because there is no available, or even potentially available, water source to serve the development that these maps envision. While it is true that the Draft EIR proposes a mitigation measure requiring "will serve" letters before individual projects are approved, the result of this measure is that build out of the City's will occur on a random, patchwork basis that is not, ultimately, consistent with the City's land use maps or its commitment to implementing "smart growth" principles.

A moratorium on development due to lack of available water supply after just 60% buildout, will also impact the City's ability to implement other policies in the general plan and mitigation measures in the Draft EIR, several of which rely on continued development approvals (and the taxes, land dedications, and developer fees that come with such development) as the method for implementing their provisions. 8-17 cont.

In *Planning and Conservation League v. Department of Water Resources*, the Court of Appeal struck down a Draft EIR for a water transfer agreement (and, thus, the approval of the agreement itself) because the Draft EIR relied on "paper water" from the State Water Project as a fiction that could never be implemented in the real world.[65] The situation faced by City due to the substantial shortfall of identifiable water supply for the City's proposed general plan is similar. General plans are supposed to ensure the orderly development of communities, by serving as a "constitution" for development.[66] In this case, only a random two-thirds of the general plan proposed by the City can be implemented (depending on who gets the required "will serve letters" first), because every available indication is that 40% of the water required to fully implement the general plan does not exist.

XII. FAILURE TO ADEQUATELY DISCLOSE, ANALYZE OR MITIGATE CUMULATIVE WATER SUPPLY IMPACTS

The Draft EIR never substantively discloses, analyzes or mitigates the admittedly "cumulatively considerable" water supply impacts that would result from the City's approval of its proposed general plan, when considered in combination with the massive urbanization that is presently occurring throughout the region. Under its "cumulative setting" discussion for hydrology and water quality, the EIR states: 8-18

[64] Draft EIR, Table 4.9-7, p. 4.9-45.
[65] *Planning and Conservation League v. Department of Water Resources* (2000) 83 Cal.App.4th 892.
[66] *Lesher*, *supra*, 52 Cal.3d 531; *Citizens of Goleta Valley*, *supra*, 52 Cal.3d 553.

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> Reducing and mitigating the cumulative water impacts from development within the Sacramento Valley groundwater basins was the premise behind the preparation of the Water Forum Agreement. The reader is referred to Section 4.0 regarding a description of development activities within the region that contribute to cumulative water resource impacts.[67]

Section 4.0 contains a five-page table, constituting a summary list of approved and proposed projects in the region. This table (and the rest of section 4.0) contains no discussion of the water supply demands for these projects or how they might interact with this project to result in cumulatively significant, adverse effects on regional water supply.

Section 4.0 does assert, at one point, that Section 5.0 of the Draft EIR "provides a summary of the cumulative impacts associated with the General Plan."[68] However, Section 5.0 contains nothing more than a rote recitation of the cumulative impacts identified in each of the prior section's analyses, and contains no new information regarding how the City's general plan may contribute to cumulatively significant, adverse environmental effects when taken in combination with the table of projects at Section 4.0 of the EIR.[69]

In sum, the Draft EIR's entire "analysis" of cumulative impacts associated with inadequate water supplies reads as follows:

8-18 cont.

> As noted under Impact 4.9.4, there is currently not adequate existing and planned water supplies identified to serve full buildout of the proposed General Plan (51,089 afy shortfall). Future growth in the region (e.g., as identified in the Sacramento Area Council of Government's Region Blueprint process and City of Folsom Sphere of Influence) would further contribute to the need for additional sources of water supply currently not planned for. This could result in further direct and indirect environmental effects associated with the development of new water supply sources.[70]

The Draft EIR then recites a number of policies and implementing actions in the general plan, and then contains the following discussion, in its entirety, of mitigation measures for cumulative water supply impacts:

> Implementation of the above proposed General Plan policies and action items and Mitigation Measure **MM 4.9.4** would ensure that the new development under the General Plan would not proceed without verification and determination that an adequate water supply exists. As noted above, it is speculative that additional water supply sources would be available to serve buildout of the entire Planning Area or development beyond. In addition, the proposed General Plan would contribute to identified significant environmental impacts associated with

[67] Draft EIR, p. 4.9-57.
[68] Draft EIR, p. 4.0-10.
[69] Draft EIR, p. 5.0-7.
[70] Draft EIR, p. 4.9-62 to 4.9-63.

Letter 8 Continued

> planned water supply projects as well as potential future other water supply sources. Given these conditions, this impact is considered **cumulatively considerable** and thus is **significant and unavoidable**.[71]

The discussion then abruptly ends without any discussion of proposed mitigation measures or alternatives to reduce or avoid this recognized, significant adverse environmental effect.

The Draft EIR's "discussion" of cumulative water supply impacts is so basically and fundamentally inadequate that it precludes meaningful public review or comment. The EIR expressly acknowledges that such impacts are "cumulatively considerable."[72] Accordingly, the EIR must substantively disclose and discuss the sources and nature of such impacts, and propose mitigation measures or alternatives that could feasible reduce or avoid such impacts.[73]

CEQA Guideline section 15130 expressly sets forth the details of what is required in a legally adequate cumulative impacts analysis. A full and complete copy of CEQA Guideline section 15130, and the accompanying "discussion" by the Resources Agency in promulgating this guideline, is attached as Appendix B to this letter, and incorporated by reference at this point in this letter as if set forth in full.[74] 8-18 cont.

The City's cumulative impacts analysis for water supply violates CEQA, because CEQA Guideline section 15130 does not authorize a lead agency to summarily conclude in its Draft EIR that an "impact is considered **cumulatively considerable** and thus is **significant and unavoidable**." CEQA Guideline section 15130, instead, sets forth very specific investigatory and information disclosure requirements regarding other projects and their cumulative contributions to the cumulative effects that are identified in an EIR as "cumulatively considerable."[75] This section also states that "An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects."[76]

None of this required information is presented, or even summarized, in the Draft EIR. The cross reference to Section 4.0 simply provides a list of other past, present and future projects in the region, but contains no information regarding cumulative water supply demands or impacts. Section 5.0, which purports to address "Cumulative Impacts," contains no new analysis or information from that presented in the Draft EIR's hydrology and water quality section.

The Draft EIR's implied reliance on the WFA as having addressed the proposed general plan's cumulative water supply impacts is also misplaced.[77] First, the WFA is not a binding agreement between the signatories, and is not legally enforceable. Second, even if the WFA could be 8-19

[71] Draft EIR, p. 4.9-66.
[72] Draft EIR, p. 4.9-66.
[73] CEQA Guidelines, § 151626, 15126.2, 15126.4, 15126.6, 15130.
[74] See Appendix B: CEQA Guideline § 15130 and accompanying "discussion" by the California Resources Agency.
[75] CEQA Guidelines, § 15130, subd. (b)(5).
[76] CEQA Guidelines, § 15130, subd. (b)(5).
[77] Draft EIR, p. 4.9-57.

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enforced, the EIR that was prepared for the WFA concluded with a laundry list of "significant and unavoidable" impacts that would result from implementation of the WFA.[78] The City's Draft EIR must, therefore, address the question of whether there are any mitigation measures or alternatives available that could reduce or avoid the proposed general plan's contribution to the significant and unavoidable effects identified in the WFA EIR.[79] Finally, the WFA was completed in 2000 based on land use assumptions under the County's general plan that are radically different than those in the City's proposed general plan, a fact that is admitted in the Draft EIR.[80] For all these reasons, the mere existence of the WFA and its EIR do not relieve the City of its duty under CEQA to prepare and circulate for public review, a Draft EIR that discloses, analyzes and mitigates or avoids, where feasible, the acknowledged, "cumulatively considerable" water supply impacts associated with its proposed general plan. 8-19 cont.

XIII. THE GENERAL PLAN AND DRAFT EIR LACK ADEQUATE CONSIDERATION OF POLICIES, MITIGATION MEASURES AND ALTERNATIVES THAT COULD REDUCE OR AVOID "SIGNIFICANT AND UNAVOIDABLE" AIR QUALITY IMPACTS

As with its Natural Resource element, the general plan's Air Quality element contains numerous policies that topically address important air quality issues associated with the City's proposed, future development. Unfortunately, once again, these policies are not worded in sufficiently 1) clear, or 2) mandatory terms to actually be enforceable.[81] Policies that "promote" land uses that reduce vehicle travel, "encourage" infill development, and that "coordinate" planning with other jurisdictions to improve air quality all represent laudable goals. Absent enforceable language, however, these policies are inadequate to ensure that the City will not exacerbate already deteriorated air quality in the region as its general plan is implemented. 8-20

In fact, this is what the Draft EIR concludes, in determining that implementation of the general plan, as proposed, will result in noncompliance with the 1994 SMAQMD Regional Ozone Attainment Plan:

> The above General Plan policies and action items would assist in the improvement of air quality conditions. However, they do not require the City to reduce future land uses to be more inline with the Blueprint projections used in the Attainment Plan update. As such, implementation of this policy would not fully mitigate the conflict between the proposed General Plan buildout projections and those used in the update Attainment Plan. In addition, there are no feasible methods to completely offset air pollutant emission increases from land uses under the proposed General Plan. Thus, this impact is considered **significant and unavoidable.**[82] 8-21

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[78] Draft EIR, p. 4.9-50.
[79] CEQA Guidelines, § 15130, subd. (b)(5).
[80] Draft EIR, p. 4.9-30 to 4.9-31. See discussion at note 60, *supra*.
[81] See discussion at Part II, *supra*, titled, "The City's Proposed General Plan Does Not Contain Sufficiently Clear and Mandatory Policies Regarding the Acquisition, Preservation, and Protection of Sensitive Species and Habitats."
[82] Draft EIR, p. 4.6-17.

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The Draft EIR's summary assertion that "there are no feasible methods to completely offset air pollutant emission increases from land uses under the proposed General Plan," again misses one critical, mandatory step in the CEQA process: mitigation measures and alternatives must at least be *proposed* and *analyzed* before they can be summarily dismissed as "infeasible." The Draft EIR violates CEQA by summarily declaring all mitigation infeasible without any discussion or investigation of what measures or alternatives might actually be available to reduce or avoid the general plan's significant and unavoidable air quality impacts. 8-21 cont.

For example one potentially feasible mitigation measure might be a mandatory requirement of phasing future development to performance goals in meeting air quality standards, unless an individual project can be demonstrated to have no adverse air quality impacts, or the project's direct and indirect air emissions are fully mitigated. At minimum, the Plan should prohibit development outside the current city boundary until full compliance with state and federal ozone attainment plans can be affirmed. The potential of incorporating such a measure into the general plan is not identified or discussed in the Draft EIR. Given that the federal Clean Air Act requires new air quality plans be adopted in 2007, it would be appropriate for the City of Rancho Cordova to align its general plan with the new federal ozone attainment plan. 8-22

Another potentially feasible mitigation measure might be a general plan policy requiring compliance with future, adopted air quality plans that are designed to attain state and federal air quality standards. A number of air quality plans will have to be updated or adopted over the life of the City's proposed general plan, and there should be no impression that the City's adoption of this general plan before those air quality plans are formulated or revised creates some form of "precedent," or "grandfathered" land uses, that can violate those future attainment plans. 8-23

Other mitigation measures that might have been, but were not, considered in the Draft EIR include establishing a clear and mandatory policy that development will not be approved that would interfere with attainment of any air quality standard, or the establishment of mandatory policies requiring the avoidance of air pollution impacts on sensitive receptors located near sources of diesel particulate, as recommended by the California Air Resources Board in its publication "Air Quality and Land Use Impacts." 8-24

The failure of the Draft EIR to even *consider* mitigation measures for the general plan's noncompliance with the 1994 SMAQMD Regional Ozone Attainment Plan is of particular concern, due to the recognized consequences of such noncompliance:

> In the early 1990's the Sacramento area had the fifth worst ozone air quality in the United States. The Federal CAA set new deadlines for attaining the federal ozone standards. In 1994, the Sacramento Metropolitan Air Quality Management District adopted a plan to attain this standard called the Regional Ozone Attainment Plan (also called the State Implementation Plan, or SIP). Currently, SMAQMD is in the process of updating the Attainment Plan. This update uses SACOG's Sacramento Region Blueprint: Transportation/Land Use Study as a basis for projected growth in the area (per. comm. Borkenhagen). SACOG's Blueprint has projected population of 332,000 persons, 112,290 housing units, 8-25

Letter 8 Continued

> and 144,406 jobs for the area by the year 2050. While the area defined as the Rancho Cordova Community by SACOG does not precisely match the General Plan Planning Area, it is within range to approximate the SACOG anticipated growth for the area. The proposed Rancho Cordova General Plan projects a total buildout population of 310,568, 126,241 housing units and 195,021 jobs. The differences in population, housing units and employment between these two growth scenarios is substantial resulting in an exceedance of the data used to formulate the Regional Ozone Attainment Plan and its ozone reduction predictions and mitigations. Conflicts with the Regional Ozone Attainment Plan may result in the non-attainment of air quality standards for the SMAQMD area. *This would be in direct disagreement with the California Clean Air Act resulting in the potential loss of transportation funding for the Sacramento area.* This is considered a significant impact.[83] 8-25 cont.

In addition it appears that the Draft EIR, while considering ozone standards in the regional context under the 1994 SMAQMD Regional Ozone Attainment Plan, fails to adequately disclose or analyze the general plan's potential to directly result in significant, adverse impacts on the attainment of the *state* ozone standard. It is not sufficient to analyze the operational air quality impacts of one city's general plan in the context of compliance with a regional conformity process. A federal conformity determination (which addresses cumulative air quality impacts on a regional scale on the federal ozone standard) cannot serve as a threshold of significance under CEQA to establish that this general plan's air quality impacts would be insignificant with respect to attainment of the state ozone standard. Alternative significance criteria and methodology must be used to specifically address these air quality impact issues with respect to the state standard.

Finally, with regard to cumulative air quality impacts, the Draft EIR suffers from similar procedural and substantive defects as identified above in our comments on the general plan's potentially significant, adverse cumulative water quality impacts. The methodology of this section of the EIR is practically identical to its cumulative water supply impact analysis, and leads to a similar conclusion:

> Implementation of the above proposed General Plan policies and action items and mitigation measures MM 4.6.2 and MM 4.6.4a and b identified above would assist in reducing the General Plan's contribution to cumulative regional and local air quality impacts; however, this contribution is still considered **cumulatively considerable** and thus a **significant and unavoidable impact**. No feasible mitigation is available to completely mitigate this impact.[84] 8-26

As noted above, the Draft EIR violates CEQA because the CEQA guidelines do not authorize a lead agency to make a finding that cumulative impacts are significant and unavoidable because they are cumulatively considerable.[85] Rather, upon its determination that air quality impacts are

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[83] Draft EIR, p. 4.6-16.
[84] Draft EIR, p. 4.6-38.
[85] CEQA Guidelines, § 15130 (attached at Appendix B). See discussion at Part XII, titled "Failure to Adequately Disclose, Analyze or Mitigate Cumulative Water Supply Impacts," *supra*.

Letter 8 Continued

cumulatively considerable, the Draft EIR must 1) disclose and describe how this project, when considered in combination with other past, present and future projects, is resulting in the cumulatively considerable impact, and 2) investigate and analyze potentially feasible mitigation measures or alternatives to reduce or avoid the proposed general plan's contribution to those cumulatively considerable impacts.[86] 8-26 cont.

XIV. THE GENERAL PLAN AND DRAFT EIR LACK ADEQUATE CONSIDERATION OF POLICIES, MITIGATION MEASURES AND ALTERNATIVES THAT COULD REDUCE OR AVOID "SIGNIFICANT AND UNAVOIDABLE" CIRCULATION IMPACTS.

With regard to traffic, the City's proposed general plan acknowledges that the City is challenged by regional congestion on Highway 50 and Sunrise Boulevard and by lack of connectivity. However it fails to adequately acknowledge and build on the light rail and heavy rail connections they do have, or to incorporate and expand on existing County and SACOG MTP projects. As presented, the circulation element and land use elements of the general plan appear to depict an auto-oriented plan that calls for the construction of a major network of four and six lane expressways across the City's planning area to facilitate sprawling residential subdivisions at the edges of the City's current limits and beyond. 8-27

Rancho Cordova presently has a large stock of multi-family housing with people in need of mobility who are likely in the future to be constrained by low or modest incomes, unable to afford the $8,500 + per auto, and unable to afford $4.00 to $6.00 per gallon gasoline. The general plan's circulation element would be greatly strengthened if there were a section that focused on the transportation needs of present residents, maintenance, and retrofitting streets in the older urban and suburban areas for infill and more livable communities.

Also, while the general plan's circulation element uses many key "smart growth" words, several key issues seem to be missing in this element including the following:

- Discussion of the current and projected increase in the price of gasoline, global warming and other energy issues for a sustainable future.
- Policies requiring the reuse of parking lots for infill.
- Policies requiring parking maximums, rather than minimums.
- More focus on integrating into this element provisions regarding urban form, and retrofitting and enhancing existing older commercial areas.
- Policies requiring, as a priority, maintenance and retrofitting of older roads.
- Policies that do not use new roads and roadway widening/expansion to facilitate leap frog development.

8-28

[86] CEQA Guidelines, § 15130.

Letter 8 Continued

Unfortunately, the General plan does not adequately address such policies, and the discussion in the Draft EIR does not go far enough in evaluating mitigation measures that would move the City in such positive directions. As just one example, after recognizing that growing the City from 50,000 to 300,000+ residents will have substantial, adverse traffic and circulation impacts on key intersections within the City, the Draft EIR declares impacts are not mitigable based on a finding that key intersections cannot be adequately widened.[87] Instead the EIR should be considering and discussing mitigation measures that could feasibly stabilize or reduce demand at these existing intersections, by promoting 1) alternative means of transportation, and 2) development patterns and policies, such as those above, that reduce the need for auto travel. 8-28 cont.

XV. CONCLUSION

The public review period that has been allotted by the City for its Draft EIR is too short, and should be extended to allow adequate time for public comment and review. Even with the submittal of these Draft EIR comments by the City's chosen deadline, our review and analysis of the Rancho Cordova general plan and EIR is ongoing. 8-29

However, even this initial review of the Draft EIR and general plan indicates that these documents should be substantially revised and recirculated for public review before their adoption. As noted above, among other things, the general plan fails to adequately set forth an "action program" for the acquisition and preservation of open space. The general plan contains no enforceable policies to protect special status species and their habitats. And, impacts to a broad range of special status species and their habitats are declared significant and unavoidable in the Draft EIR, despite the availability of potentially feasible mitigation measures in the form of requiring an HCP or NCCP to be adopted before future development projects are approved. 8-30

With regard to water supply, the general plan is internally inconsistent, because it proposes sprawling development and growth patterns that exceed by 40% all known or identifiable future water supplies, while the Draft EIR declares that finding the remaining 50,000 afy needed to fully implement the general plan is "speculative." The Draft EIR also fails to adequately disclose, analyze or consider potentially feasible mitigation measures or alternatives for direct and cumulative water supply and air quality impacts. And, with regard to traffic, the Draft EIR declares impacts to numerous intersections to be significant and unavoidable, yet fails to consider mitigation measures in the form of general plan policies and actions that would promote transit or otherwise stabilize or reduce demand at the affected locations. 8-31

On behalf of Habitat 2020 and ECOS, we thank the City for this opportunity to comment on its Draft EIR and General Plan.

Sincerely,

Keith G. Wagner

Keith Wagner

[87] Draft EIR, p. 4.5-52 to 4.5-54.

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Appendix A - Rancho Cordova General Plan Policies

APPENDIX A

RANCHO CORDOVA GENERAL PLAN POLICIES

This Appendix recites each of the Rancho Cordova general plan's Policies regarding Natural Resources. As noted in the attached comment letter by Habitat 2020 and ECOS, none of these policies is worded in sufficiently clear and mandatory language to be enforceable, as a practical matter.

- **Policy NR.1.1** - Incorporate large and interconnected wildlife corridors in new development areas to provide ample space for animal movement.
- **Policy NR.1.2** - Conserve Swainson's hawk habitat.
- **Policy NR.1.3** – Promote educational programs that inform the public about natural resources.
- **Policy NR.1.4** - Discourage the planting of invasive species.
- **Policy NR.1.5** - Ensure the protection of wildlife through the establishment of programs to control feral pet populations.
- **Policy NR.2.1** – Require mitigation that provides for "no net loss" of wetlands.
- **Policy NR.2.2** - Ensure that direct and indirect effects to wetland habitats are minimized by environmentally sensitive project siting and design, to the maximum extent feasible.
- **Policy NR.2.3** – Works with private and non-profit conservation organizations to ensure competitive pricing for mitigation bank credits by allowing government agencies, non-profit organizations, and private landowners to establish vernal pool preserves, designate mitigation areas, create and restore vernal pools, and sell credits to developers for off-site mitigation.
- **Policy NR.3.1** - Coordinate with groups such as the Sacramento Urban Creeks Council to restore, enhance, and preserve creeks in Rancho Cordova.
- **Policy NR.3.2** - Create or retain the natural topographic relief and meandering alignment of natural creek corridors in the construction of new channels and the modification of existing channels, and discourage the placement of concrete within creeks and channels.
- **Policy NR.3.3** - Encourage the creation of secondary flood control channels where the existing channel supports extensive riparian vegetation.

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Appendix A - Rancho Cordova General Plan Policies

- **Policy NR.3.4** – Encourage projects that contain wetland preserves or creeks, or are located adjacent to wetland preserves or creeks, to be designed for maximum visibility and, as appropriate, access.
- **Policy NR.4.1** - Conserve native oak and landmark tree resources for their historic, economic, aesthetic, and environmental value.
- **Policy NR.4.2 -** Improve overall landscaping quality and sustainability in all areas visible to the public.
- **Policy NR.4.3** - Promote trees as economic and environmental resources for the use, education, and enjoyment of current and future generations.
- **Policy NR.5.1** - Promote water conservation within existing and future urban uses.
- **Policy NR.5.2** - Encourage the use of treated wastewater to irrigate parks, golf courses, and landscaping.
- **Policy NR.5.3** - Protect surface and ground water from major sources of pollution, including hazardous materials contamination and urban runoff.
- **Policy NR.5.4 -** Prevent contamination of the groundwater table and surface water, and remedy existing contamination to the extent practicable.
- **Policy NR.5.5** – Minimize erosion to stream channels resulting from new development in urban areas.
- **Policy NR.6.1** – Ensure that the environmental effects of mining and reclamation on aquifers, streams, scenic views, and surrounding residential uses are prevented or minimized.
- **Policy NR.6.2** – Eliminate residual hazards to the public health and safety.
- **Policy NR.7.1** - Increase energy conservation Citywide.
- **Policy NR.7.2** - Promote the development and use of advanced energy technology and building materials in Rancho Cordova.
- **Policy NR.7.3** - Encourage the development of energy efficient buildings and subdivisions.
- **Policy NR.7.4** - Promote energy rebate programs offered by local energy providers (e.g., SMUD, PG&E) as a way to bring energy efficiency into older neighborhoods and developments.

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Appendix A - Rancho Cordova General Plan Policies

- **Policy NR.8.1** - Support recycling efforts by developing a set of programs to educate residents on recycling and provide recycling services.
- **Policy NR.8.2** - Encourage all companies that do business in Rancho Cordova to recycle and reuse construction scraps, demolition materials, concrete, industrial waste, and green waste.
- **Policy NR.8.3** - Promote the use of rubberized asphalt on all public roadways in an effort to recycle old tires and reduce noise impacts. Implementation of this policy will help to preserve aggregate resources.
- **Policy NR.8.4** - Encourage the use of recycled materials and source reduction (also known as waste prevention) by governmental agencies and local businesses.
- **Policy NR.8.5** - Meet state mandates for solid waste reduction and recycling. Increase recycling efforts beyond those required by state law through supporting businesses that buy and sell re-used materials, such as materials exchange centers.
- **Policy NR.8.6** - Encourage the use of recycled-content products and construction materials.
- **Policy NR.8.7** - Maintain contact with Sacramento County and BFI regarding the capacity projections of Kiefer Landfill and Lockwood Landfill to ensure an adequate capacity for the long-term disposal needs of Rancho Cordova.

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Appendix B – CEQA Guideline § 15130.

APPENDIX B

This appendix sets forth the full text of CEQA Guidelines § 15130 and the California Resources Agency's "discussion" following this Guideline. The City's Draft EIR fails to follow the procedures set forth in this section for consideration of the project's cumulative impacts, including, but not limited to, cumulative water supply impacts.

CEQA GUIDELINE § 15130. DISCUSSION OF CUMULATIVE IMPACTS

(a) An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in section 15065(c). Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

(1) As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.

(2) When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

(3) An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

(b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. The following elements are necessary to an adequate discussion of significant cumulative impacts:

(1) Either:

(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or

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Appendix B – CEQA Guideline § 15130.

(B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

(2) When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.

(3) Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.

(4) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and

(5) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

(c) With some projects, the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis.

(d) Previously approved land use documents such as general plans, specific plans, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in section 15152(f)~~(e)~~, in a certified EIR for that plan.

(e) If a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact, as provided in Section 15183(j).

Note: Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21083(b), 21093, 21094 and 21100, Public Resources Code; *Whitman v. Board of Supervisors,* (1979) 88 Cal. App. 3d 397; *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692; *Laurel Heights Homeowners Association v. Regents of the University of California* (1988) 47 Cal.3d 376; *Sierra Club v. Gilroy* (1990) 220 Cal.App.3d 30; *Citizens to*

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Appendix B – CEQA Guideline § 15130.

Preserve the Ojai v. County of Ventura (1985) 176 Cal.App.3d 421; *Concerned Citizens of South Cent. Los Angeles v. Los Angeles Unified Sch. Dist.* (1994) 24 Cal.App.4th 826; *Las Virgenes Homeowners Fed'n v. County of Los Angeles* (1986) 177 Cal.App.3d 300; *San Joaquin Raptor/Wildlife Rescue Ctr v. County of Stanislaus* (1994) 27 Cal.App.4th 713; *Fort Mojave Indian Tribe v. Cal. Dept. Of Health Services* (1995) 38 Cal.App.4th 1574; and *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98.

Discussion: This section is necessary to explain how to discuss cumulative impacts in an EIR. The section limits the discussion to situations where the cumulative effects are found to be significant. Further, the section codifies the requirements for analysis of cumulative effects as spelled out in *Whitman v. Board of Supervisors*, cited in the note, but the section allows the alternative approach of summarizing projections from a planning document. The options allow the Lead Agency to choose the method of analysis that may be best suited to the situation at hand. Essential guidance is also provided on approaches to mitigating cumulative effects, since cumulative effects can rarely be mitigated in the same way as the primary effects of an individual project.

When analyzing the cumulative impacts of a project under 15130 (b)(1)(A), the Lead Agency is required to discuss not only approved projects under construction and approved related projects not yet under construction, but also unapproved projects currently under environmental review with related impacts or which result in significant cumulative impacts. This analysis should include a discussion of projects under review by the Lead Agency and projects under review by other relevant public agencies, using reasonable efforts to discover, disclose, and discuss the other related projects. The cumulative impact analysis requires a discussion of projects with related cumulative impacts which required EIRs, Negative Declarations, or were exempt from CEQA. (See: *San Franciscans for Reasonable Growth v. City and County of San Francisco*, (1984) 151 Cal. App. 3d 61.) The court in SFFRG took note of the problem of where to draw the line on projects undergoing environmental review since application of new projects are constantly being submitted. A reasonable point might be after the preparation of the draft EIR. Additional project information could be included in the final EIR if cumulative impacts were originally analyzed in the draft EIR and if the new project information doesn't warrant the preparation of a subsequent or supplemental EIR as required by Section 15162 of the Guidelines.

Subsection (b)(1)(B) authorizes a lead agency to limit its analysis of probable future projects to those which are planned or which have had an application made at the time the NOP is released for review. This describes a reasonable point in time at which to begin the cumulative impact analysis. Without this guideline, the cumulative impact analysis may suffer frequent revision as new, incremental projects are identified. If additional projects are identified later, they may be addressed during completion of the final EIR.

Cumulative impacts analysis must include reasonably anticipated future activities of a project or associated with the project. Whether these activities are addressed in the cumulative impact analysis section or in the impacts associated with the project, as defined, if there is substantial evidence indicating reasonable foreseeable future projects or activities, an EIR must analyze the impacts of those future activities. The Court in *Laurel Heights* set forth the following two pronged test to determine whether an EIR must include an analysis of the environmental effects

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Appendix B – CEQA Guideline § 15130.

of future activities: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects. Absent these two circumstances, potential future expansion need not be considered. *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal. 3d 376.

Consistent with the holding in *Antioch v. Pittsburg* (see discussion with Section 15126), a cumulative impact analysis should address the most probable development patterns.

This section describes the analysis necessary where a project will make a considerable contribution to a cumulative effect (see also section 15064). Based on the holding in San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1996) 42 Cal.App.4th 608, subdivision (a) provides that when the lead agency determines that a project makes only a de minimus contribution to a cumulative effect no analysis of the cumulative effect is needed. This subsection also provides that an EIR may determine that a project's contribution, originally thought to be considerable, is less than considerable with mitigation. Any such conclusion must be documented in the EIR.

Subsection (b) discusses the elements necessary for an adequate discussion of significant cumulative impacts. It recommends that the discussion focus on the particular cumulative impact to which other projects contribute rather than on the non-contributing aspects of those projects. This subsection offers further guidance on focusing the discussion on impacts rather than on other projects per se.

Subsection (d) links cumulative impact analysis to tiering and other similar approaches which seek to limit redundant analyses. Where cumulative impacts have been adequately addressed in the EIR certified for a general plan or other programmatic plan, and the project is consistent with that plan, the discussion contained in the prior EIR may be incorporated by reference. No further cumulative impact analysis would be necessary.

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APPENDIX C

Letter from James P. Pachl to City of Rancho Cordova Planning Commission re: Comments of Friends of the Swainson's Hawk and Sierra Club on proposed recommendation for approval of "The Preserve at Sunridge" (March 27, 2006).

Letter 8 Continued

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March 27, 2006

Ermest Vance, Chair, and Commissioners
Rancho Cordova Planning Commission
William Campbell, Principal Planner
Hilary Anderson, Environmental Coordinator
2729 Prospect Park Drive
Rancho Cordova, CA 95670

RE: Planning Commission Meeting, **April 13, 2006.**
Comments of Friends of the Swainson's Hawk and Sierra Club on proposed recommendation for approval of "The Preserve at Sunridge"

Dear Chairman Vance, Planning Commissioners, Mr. Campbell, and Ms. Anderson,

The following comments are on behalf of Sierra Club - Mother Lode Chapter, and Friends of the Swainson's Hawk. Please see my comment letter for Friends of the Swainson's Hawk, December 5, 2005 (at p. 3.0-81 of the FEIR), and my letter to this Commission dated March 9, 2006. We are requesting changes in Mitigation Measure 4.9.1a.

A. Mitigation for Impacts on Swainson's Hawk Foraging Habitat (revised MM 4.9.1a)

This letter responds to staff's proposed revised MM 4.9.1a as it existed on March 24, 2006 (attached EXHIBIT A.). I am on vacation through April 12, 2006, and will not be able to submit timely written comment on the staff report for that meeting. Possibly staff's proposed revised MM 4.9.1a will be further modified prior to April 13.

1. Suggested Alternative MM 4.9.1a. (by Friends of the Swainson's Hawk and Sierra Club)

As discussed below, there are some issues with staff's proposed MM 4.9.1a. My clients respectfully suggest the following alternative wording for MM 4.9.1a, which incorporates some of the language of the Sacramento County SWH Mitigation Ordinance:

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"a. Prior to the approval of grading and improvement plans, or any ground-disturbing activities, whichever occurs first, the project applicant shall acquire and preserve, through transfer of fee title or perpetual conservation easement, in the manner stated below, 1 acre of suitable SWH foraging habitat for each acre impacted by the project. Prior to committing to the preservation of any particular parcel pursuant to this measure, the project proponent must obtain approval of the mitigation parcel by DFG and City. The mitigation parcel shall be located in Sacramento County within ten miles of the project site and within reasonable proximity of SWH nest trees, as determined by City and DFG. If the land's suitability for SWH foraging habitat is related to agricultural use on the land, the Conservation Easement or related document shall retain and protect any existing water rights necessary to maintain agricultural use of the land."

"b. The project applicant shall transfer said SWH conservation easement, or fee title subject to such SWH conservation easement, to the City, DFG, and a third party conservation organization (Conservation Operator"), acceptable to City and DFG. The Conservation Operator shall be a nonprofit organization having IRC § 501c(3) status. The conservation easement shall be recordable and shall prohibit any activity which substantially impairs or diminishes the land's capacity as suitable SWH foraging habitat. The content and form of the conservation easement must be acceptable to City, DFG, and Conservation Operator. The Conservation Operator, DFG, and City shall each have the power to enforce the terms of the conservation easement. The Conservation Operator shall monitor the easement in perpetuity to assure compliance with the terms of the easement."

"c. The project applicant shall pay to City an endowment fee in an amount which will produce sufficient interest in perpetuity to operate, maintain, monitor, and enforce such conservation easement. The amount of the O and M fee shall be determined by mutual agreement of City and the Conservation Operator charged with such activity, not to exceed $3,500 per acre. The actual amount will be calculated by use of the Property Analysis Record (PAR) software program or other generally accepted, attribute based, site specific method for calculating endowment for managing, monitoring, and enforcing conservation easements or operating preserves."
(NOTE: Sacramento County's and Elk Grove's fee for endowing O and M is approximately $2,300 per acre, using The Nature Conservancy as Conservation Operator.)

"d, The Conservation Operator shall not sell, lease, or transfer any interest in any conservation easement or mitigation land which it acquires without prior written approval of the City and DFG. If the Conservation Operator ceases to exist, the duty to hold, administer, monitor, and enforce the interest shall be transferred to another entity acceptable to County and DFG, or transferred to City itself."

OR
"The Project Applicant may participate in a future City SWH ordinance (once adopted) as an alternative to the measure above."

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OR
"The project applicant may participate in a future South County HCP (once adopted) as an alternative to the above measures."

2. Staff's Proposed MM 4.9.1a (March 24, 2006) Is Noncompliant with CEQA

The staff's current proposed MM 4.9.1a is certainly a commendable improvement over the version presented at the March 9, 2006, Planning Commission meeting, but problems remain.

City staff's proposed MM 4.9.1a requires preservation of sufficient land to ensure a 1 to 1 mitigation ratio of "habitat value" lost due to the project, as determined by City in consultation with DFG. Staff intends this to mean that the actual area of SWH habitat preserved will be less than the area of land developed if City staff determines that the land preserved has greater habitat value than the land developed. The mitigation land is not identified, and there is no objective standard for determining relative "habitat values". City does not have the expertise to determine relative "habitat values." City must consult with DFG, but may disregard DFG's expert advice, even though DFG is the Trustee agency having jurisdiction over threatened and endangered species. (Pub Res Code §21070, CEQA Guideline 15386)

Determination of the actual mitigation measure (protection of an identified parcel of land of a certain size) is deferred until later. Deferred mitigation is acceptable under the California Environmental Quality Act (CEQA) ONLY if the adopted mitigation measure includes performance standards which must be met by the mitigation measure, (e.g.: one acre of land to be preserved for every acre impacted by development). However, staff's proposed MM 4.9.1a contains no quantifiable standard for determining whether a 1 to 1 ratio of "habitat values" has been achieved, and City has no biological expertise and are free to disregard DFG's advice.

MM 4.9.1a is so loosely worded that City can do whatever it wants and assert that it meets the criteria of MM 4.9.1a. Deferred mitigation without quantifiable standards about what that mitigation shall be is improper under CEQA and exposes the City and Applicant to potential CEQA litigation which could led to revocation of project approval.

Moreover, there is no substantial evidence that a mitigation ratio of less than one acre preserved for each acre developed will mitigate impacts to SWH to less than significant, which is yet another violation of CEQA, which requires that Findings be supported by substantial evidence.
All other SWH mitigation programs in the region (Sacramento County, Elk Grove, Yolo JPA , San Joaquin County HCP) require a 1 to 1 mitigation ratio. The one exception is the Natomas Basin HCP, which requires only a 0.5 to 1 mitigation ratio. However, mitigation land is held in fee title by the Natomas Basin Conservancy and actively managed to maximize benefits to SWH. It optimistically assumes that such active management for SWH benefits will result in higher habitat value than simply retaining

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private agriculture by a conservation easement. The NBHCP's program also relies on the assumption that new development in the Basin will not exceed 17,500 acres for 50 years after 1997, and that the remaining 29,000 acres of the Basin will remain in agriculture for 50 years and continue to provide habitat.

It should be understood that a 1 to 1 mitigation ratio results in a 50% reduction of habitat. If there are two acres of habitat, and one is developed with a 1 to 1 mitigation ratio requirement, the net effect is that there remains one acre of habitat where there were formerly two acres of habitat. There is no evidence that MM 4.7.1a contemplates converting non-habitat land to habitat; nor does MM 4.7.1a contemplate managing the mitigation habitat land to increase its habitat value twofold (which is the only way that a 1 to 1 mitigation ratio could fully mitigate.) For that reason, even a 1 to 1 mitigation ratio does not fully mitigate, although permanent preservation of existing SWH foraging habitat is better than no assurance of permanent preservation. A ratio of less than 1 to 1, as intended by City staff, is clearly inadequate.

Determination of the suitability of the site of the mitigation land and the terms of the conservation easement are at City's discretion, with no standards established by staff'. Again, City must consult with DFG but may disregard DFG's advice. There is a requirement that the mitigation land be within ten miles of the project site, but no requirement that the mitigation land be within the foraging radius of any SWH nesting area. There is plenty of land that is suitable SWH foraging habitat, except that there are no SWH nests or SWH within miles of it.

As a practical matter, DFG's expert biologists recommend that SWH foraging habitat acquired for mitigation be within several miles of a SWH nests.

If DFG approval of all aspects of implementation of MM 4.9.1a was required, then it could be argued that there are sufficient standards because MM 4.9.1a must at least meet the requirements of the State Trustee agency with expertise. However, staff's proposal doesn't even do that

Finally, staff's proposed MM 4.9.1a states that City shall ensure that mitigation habitat is functioning as such by conducting regular monitoring for ten years after establishment of the easement. There is no provision for monitoring after ten years. CEQA requires that mitigation measures be enforceable and feasible. Staff's MM 4.9.1a does not meet CEQA's requirement for enforceability or feasibility of accomplishing its purpose of preservation of SWH mitigation habitat in perpetuity, because there is no provision for regular monitoring of the mitigation easement for landowner compliance with the easement conditions after ten years. Monitoring must be perpetual to ensure that the landowner (or the original landowner's successor) complies with the easement's requirement to avoid activities detrimental to SWH foraging. Courts have repeatedly voided project approvals which rely upon CEQA mitigation measures which are not feasible or enforceable.

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As you know, this project is controversial. It is possible that opponents will file a lawsuit challenging project approval. The City would be well-advised to remove inadequacy of SWH mitigation as a potential issue for such litigation, by correcting the deficiencies of MM 4.9.1a as suggested by my clients.

Staff will argue that mitigation for impacts to SWH arising from Rancho Cordova's development should be less than one acre of SWH foraging habitat preserved for each acre impacted by development, asserting that Rancho's SWH habitat has less value than SWH habitat elsewhere. However, such an argument fails to take into account the cumulative effects of ongoing large-scale reduction of SWH foraging habitat in Elk Grove, San Joaquin County, Sacramento County, Natomas Basin, and Yolo County due to urban growth and conversion to vineyards. SWH foraging habitat in Rancho Cordova supports survival of nesting SWH and its loss must be fully mitigated under CEQA and the California Endangered Species Act.

B. Vernal Pools and Wetlands

Please review the letters of U.S. Fish and Wildlife Service, FEIR pp. 3.0-8, 3.0-10, 3.0-11 through -14, (October 27, February 22, 2005, October 14, 2004); and U.S. Environmental Protection Agency, FEIR pp. 3.0-31, 3.0-33 through -46, (December 5. 2005 November 11, 2005). This project in its present form would sabotage the "Conceptual Level Strategy for Avoiding, minimizing, and Preserving Aquatic Resource Habitat I the Sunrise Douglas Community Plan Areas", June 2004, which was developed by USFWS, EPA, and the Corps to serve as the permitting strategy for Sunrise-Douglas Community Plan Area. The "Conceptual Strategy" was the result of intensive negotiations involving the Federal agencies, landowners, County, and City of Rancho Cordova.

This project appears have to been designed by landowner AKT Development and Applicants to create an ugly confrontation between City and the U.S. Fish and Wildlife Service and Environmental Protection Agency, (See attached EXHIBIT B, FEIR p. 3.0-36, USEPA letter, November 11, 2005, p. 4) AKT Development is well-known for repeated - and unnecessary -confrontations with Federal and State environmental agencies, and repeated violations of the Federal and California clean water laws.

AKT could have chosen a different project design that would have accommodated its needs and been compliant with the Conceptual Strategy developed by the agencies. Instead AKT and Applicants have deliberately chosen a strategy that is clearly intended to create yet another confrontation with the Federal agencies, but with the City of Rancho Cordova being maneuvered into the defending the unreasonable demands of AKT and River West Investments.

Rancho's approval of the project "as is" would destroy its credibility as negotiating partner and likely result in substantial additional mitigation requirements on future project applicants who can no longer rely upon the Conceptual Strategy to mitigate for the impacts of their projects. It would also undermine the strategy being developed for the South Sacramento HCP.

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It is clear from the Federal comment letters in the FEIR that the U.S. Army Corps of Engineers will not issue Federal Clean Water Act permits for this project in its present form. The City will then either expend substantial staff time and public resources working with the Applicant to re-design the project, or initiate litigation challenging denial of Federal permits. The latter would likely attract numerous intervenors and generate a negative public image of Rancho Cordova being controlled by anti-environmental developers with a "pave-over-everything" mentality. If the Corps were to grant a permit, it is possible that citizen organizations would challenge that decision in Federal court, and would likely prevail due to the ample evidence in the Federal agencies' records that such a Permit would violate the Federal Clean Water Act and Federal Endangered Species Act. Again, Rancho's public image would needlessly suffer, and huge amounts of City staff time and resources would be consumed.

We urge the Planning Commission to recommend that Council reject this project and direct staff and applicant to redesign it to be consistent with the Conceptual Strategy, at minimum. Rancho should not allow itself to be manipulated into an ugly confrontation with the Federal regulatory agencies by private development interests seeking to use Rancho as a "front" for their ongoing disputes with the Federal environmental agencies. Such a confrontation will only have negative effects on the City of Rancho Cordova and will consume City staff time and resources.

Thank you for the opportunity to comment.

Very Truly Yours,

James P. Pachl

cc: clients

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Letter 8Keith Wagner, Habitat 2020 and Environmental Council of Sacramento

Response 8-1: The commenter's statements are focused on concerns regarding the extent of development, and associated adequacy of the proposed General Plan with respect to sensitive natural resources, traffic, air quality and water supply. The Draft EIR provides an extensive analysis of these topic areas (sensitive natural resources – Section 4.10 [Biological Resources], traffic – Section 4.5 [Transportation and Circulation], air quality – Section 4.6 [Air Quality] and water supply – Sections 4.9 [Hydrology and Water Quality] and 4.12 [Public Services and Utilities]). While the commenter expresses concerns regarding the lack of proposed General Plan commitments to mitigate existing traffic conditions, CEQA does not require the EIR to address mitigation of pre-existing environmental conditions (State CEQA Guidelines Section 15126.2).

Response 8-2: State CEQA Guidelines Sections 15105(a) and 15205(d) set forth the required environmental review periods for Draft EIRs (i.e., 30 to 60 days). Upon release of the Draft EIR, City staff and commenters identified the following minor errors in the Draft EIR:

- Nine pages of setting information missing from printed hard copies of the Draft EIR Section 4.1 [pages 4.1-1 through –9].
- Figures that illustrate the alternatives in the section "6.0 Alternatives" PDF document (424 KB) of the Draft EIR files on CDs provided by the City were accidentally omitted as a result of a production error. However, the "Draft Environmental Impact Report - Full Document" PDF document (20 MB in size) provided on the CD did contain the figures.

The City released public notices regarding these minor errors on March 20, 2006 and March 27, 2006, as well as provided corrected pages of the Draft EIR in hard copy and on the City's website, directions to the alternative figures on the CDs and made available corrected CDs. As a result of these errors, the comment period was initially extended to May 4, 2006. At the March 28, 2006 General Plan Workshop, the Rancho Cordova City Council further extended the Draft EIR public comment period to May 15, 2006 as a result of this written request to extend the comment period. The total comment period on the Draft EIR was 63 days, which meets the requirements of State CEQA Guidelines (Section 15105[a]).

Regarding the length of the Draft EIR, State CEQA Guidelines Section does not prohibit Draft EIRs from exceeding 300 pages. This provision of the State CEQA Guidelines Section 15141 specifically notes that:

…proposals of unusual scope or complexity ***should*** (emphasis added) *normally be less than 300 pages.*

In the case of the General Plan, there were numerous complex and important issues that necessitated a document of this scope and size. The General Plan was the result of more than two years of City-initiated efforts to develop an effective General Plan and solicit public input, and

there were significant impacts identified in many environmental issue areas.

Response 8-3: Upon adoption, the proposed General Plan would be utilized for a variety of subsequent activities that range from consideration of specific or area plans, adoption of implementing ordinances, standards, and programs, capital improvement projects, and lastly, consideration of development entitlement requests(see Draft EIR page 3.0-55). As a result, the policy and action language provided in the proposed General Plan provides for some flexibility given that not all activities under the General Plan will be able to completely avoid physical impacts to the environment. This is especially true of fundamental aspects of the proposed General Plan, including the implementation of a land use strategy for the Planning Area that generally reflects Sacramento Council of Government's Blueprint Scenario C and the provision of improved transportation and connection throughout the Planning Area, in the habitat conditions of the Planning Area, as documented in the Draft EIR (e.g., Draft EIR Figure 4.10-1).

However, the proposed General Plan does include, and the Draft EIR evaluates, proposed policies and actions that meet the definition of performance standards for the type of project evaluated (proposed General Plan) (e.g., Draft EIR pages 4.10-39 through –43). The use of performance standard mitigation is allowed under State CEQA Guidelines Section 15126.4(a) and is supported by case law (Sacramento Old City Association v. City Council of Sacramento [3d. Dist 1991] 229 Cal.App.3d 1011, 1028 [280 Cal.Rptr. 478]). Examples of such measures include General Plan policies NR.1.1, NR.2.1 and NR.3.2; actions NR.1.1.1, NR.3.4.1, NR.4.1.1 and NR 4.1.3; and mitigation measures MM 4.10.1b and 4.10.1d. However, the Draft EIR identifies that even with implementation of these provisions, impacts to biological resources of concern would remain significant and unavoidable, given the nature and extent of alteration of Planning Area habitat conditions likely to result from implementation of the proposed General Plan (Draft EIR pages 4.10-32 through –68).

Response 8-4: Comment noted. The following mitigation measure is added as a new action item:

- Draft EIR pages 2.0-34 (Table 2.0-1) and 4.10-43, the following mitigation measure is added:

  "**MM 4.10.1f** The following measure shall be incorporated as an action item under Policy NR.1.1:

  As part of the consideration of development applications for individual Planning Areas containing habitats that support special-status plant and animal species that are planned to be preserved, the City shall require that these preserved habitats have interconnections with other habitat areas in order to maintain the viability of the preserved habitat to support the special-status species identified. The determination of the

design and size of the "interconnections" shall be made by the City, as recommended by a qualified professional, and will include consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service."

Response 8-5: Proposed General Plan Policy NR.1.2 is specifically implemented by Action Item NR.1.2.1 that involves the development of a Swainson's Hawk Ordinance (in coordination with California Department of Fish and Game) that will provide a comprehensive approach to mitigating Swainson's Hawk foraging habitat. However, the following mitigation measure is added to the Draft EIR regarding Swainson's Hawk foraging habitat to further clarify the intent of the action item:

- Draft EIR pages 2.0-34 (Table 2.0-1) and 4.10-43, the following mitigation measure is added:

"**MM 4.10.1g** The following modifications shall be made to Action NR.1.2.1:

"Establish a Swainson's Hawk Ordinance in coordination with the California Department of Fish and Game to establish ~~help guide~~ the process of mitigating for the loss of Swainson's hawk foraging habitat based on habitat value lost to development. The ordinance will set forth a process where habitat lost to development will be mitigated through the permanent protection of equivalent or better existing habitat conditions (referred to hereafter as "mitigation lands"). The specific required mitigation ratios (habitat acreage lost versus mitigation lands) and any other provisions to mitigation process shall be established through technical studies as part of the development of the ordinance and will take into account value of habitat to be converted in relation to habitat value of the mitigation lands (e.g., relation to nesting sites), proximity of the mitigation lands to adjacent conditions affecting habitat (e.g., nearby land uses and already permanently protected lands), and other relevant factors. The ordinance will also establish standards ensuring that mitigation land will be adequately protected and managed in perpetuity (e.g., via conservation easement, deed restriction or other appropriate method), and setting forth the timing of the required provision of mitigation lands in relation with the timing of the loss of habitat in the City (as its boundaries may be changed through subsequent annexations), such that mitigation

lands shall be provided no later than prior to ground disturbance."

Response 8-6: The commenter's concerns regarding the proposed General Plan's ability to function adequately as the City's "constitution for future development" is noted and forwarded to the decision makers for their consideration. The City considers the proposed General Plan to be adequate and believes it meets state law requirements for the content of a General Plan. The commenter is referred to Responses to Comment 8-3, 8-4 and 8-5.

Response 8-7: The commenter's statements and input regarding the Open Space, Parks and Trails Element are noted. These comments are associated with the General Plan, and are not directly related to the adequacy of the Draft EIR. However, to the extent that these comments form the basis for Comment 8-8, with respect to recirculation of the EIR, they are addressed herein. In addition, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission meeting will include consideration of comments received on the General Plan.

The General Plan Open Space, Parks and Trails Element establishes a policy framework and action program for the maintenance, improvement and expansion of the City's open space and recreational facilities. This policy framework and action program already constitute "specific programs" that the City will implement to preserve open space. In response to this comment, however, the City has clarified the discussion, policies (Policy OSPT.4.1) and actions (Action OSPT.2.1.1 and OSPT.2.2.1) relevant to the policy framework and action program for the maintenance, improvement, and expansion of open space facilities. (Please see June 8, 2006 staff report for Planning Commission meeting).

As with other proposed policy actions and subsequent activities under the General Plan, the Draft EIR has considered the physical direct and indirect environmental effects associated with open space uses. For example, the Draft EIR programmatically considers the indirect effects of changes in surface water flows (e.g., "summer nuisance flows") on areas that contain biological resources (see Draft EIR page 4.10-37), while the noise analysis (Draft EIR section 4.7) considers the environmental effects of active sports fields on lands designated Parks and Open Space (Draft EIR page 4.7-28). Specific subsequent proposals for land use or activities that could impact natural resources or lands designated Parks and Open Space would require review under CEQA on a project-by-project basis, the level of review depending on whether the potentially significant environmental impacts resulting from such projects were adequately considered by the General Plan EIR.

Response 8-8: The commenter is referred to Response to Comment 8-7. Because the Open Space, Parks and Trails Element already meets the statutory requirements for an Open Space action program, no changes are required. However, changes were made to the discussion, policies (Policy OSPT.4.1) and actions (Action OSPT.2.1.1 and OSPT.2.2.1) relevant to the policy framework and action program for the maintenance, improvement, and expansion of open space facilities. As has been noted elsewhere in the Final EIR, these changes to the Open Space, Parks and Trails Element do not constitute "significant new information" relating to the General Plan or the Draft EIR, which would require recirculation of the Draft EIR under State CEQA Guidelines Section 15088.5. While it is not the intent of these Responses to Comments to offer a detailed discussion of the applicability of case law to the argument made by commenter that recirculation is required, we note that it is our understanding and belief that *Mountain Lion Coalition v. California Fish and Game Commission* (1989) 214 Cal.App.3d 1043, discussed at some length by commenter, was based on facts distinguishable from the circumstances involved in the proposed General Plan. Accordingly, the case does not change the conclusion that recirculation of the Draft EIR is not required.

Response 8-9: The proposed General Plan includes several policies and action items associated with wetland resources and associated habitats (Draft EIR pages 4.10-39 through –42) which, contain the a majority of the special-status plant and animal species in the Planning Area (see Draft EIR Table 4.10-3). Thus, the General Plan does provide protective policies regarding these species. The commenter also is referred to Response to Comment 8-3, 8-4 and 8-5.

Response 8-10: The commenter is referred to Responses to Comment 8-3, 8-4 and 8-5. The Draft EIR does identify and consider the environmental effects of implementation of the General Plan, and also takes into account proposed policies and actions that would assist in reducing the General Plan's environmental effects, consistent with State CEQA Guidelines Section 15126.4(a)(1)(A). The Draft EIR also includes the consideration of three alternatives (Sacramento County General Plan Alternative, Existing City Boundary General Plan Alternative and Natural Resources Conservation Alternative) all of which provide for additional conservation of existing natural resources in the Planning Area (Draft EIR pages 6.0-5 through –67).

Response 8-11: Regarding comments to mitigation measures MM 4.10.1a and b, Mitigation Measure MM 4.10.1a will ensure (as a new General Plan policy) that the City require biological resources to be evaluated in detail in areas where sensitive resources are suspected given information provided in the General Plan EIR and other technical information. Mitigation Measure MM 4.10.1b would become an action item under Mitigation Measure MM 4.10.1a to ensure that impacts to special-status species be mitigated in coordination with the California Department of Fish and Game and U.S. Fish and Wildlife Service. However, in response to this comment, the following additional modification is made to Mitigation Measure MM 4.10.1b:

- Draft EIR pages 2.0-32 (Table 2.0-1) and 4.10-43, the following changes are made to Mitigation Measure MM 4.10.1b:

"**MM 4.10.1b** The following measure shall be incorporated as an action item immediately under the above policy (MM 4.10.1a):

For those areas in which special status species are found or likely to occur or where the presence of species can be reasonably inferred, the City shall require mitigation of impacts to those species <u>that ensure that the project does not contribute to the decline of the affected species populations in the region to the extent that their decline would impact the viability of the regional population.</u> Mitigation shall be designed by the City in coordination with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG), and shall emphasize a multi-species approach to the maximum extent feasible. This may include development or participation in a habitat conservation plan."

Regarding comments associated with Mitigation Measure MM 4.10.1c, the intent of this mitigation measure is to guide the establishment of habitat preserves into areas where interconnection is possible. However, the City may not be the entity that establishes habitat preserves. The commenter is referred to Response to Comment 8-4 regarding additional provisions regarding habitat preserves and the individual Planning Areas proposed under the General Plan.

Regarding comments associated with Mitigation Measure MM 4.10.1d, this mitigation measure specifically notes that regulatory standards would be established for construction activities, and would likely include restrictions such as the use of off-site fill and the types of Best Management Practices to be used for construction storm water quality.

Regarding comments associated with Mitigation Measure MM 4.10.1e, it is acknowledged that the design of drainage facilities may not be able to meet this standard under all circumstances from subsequent General Plan implementation and could conflict with public safety needs associated with flood control.

As noted on Draft EIR page 4.10-43, even with the implementation of the proposed General Plan policies, action items and Draft EIR mitigation measures, implementation of the proposed General Plan Land Use Map would result in an overall loss of species and their habitats. As a result, this impact was identified as significant and unavoidable.

Response 8-12: The City acknowledges the value of habitat conservation plans (HCPs) for the large-scale preservation and protection of habitats and special-status species. Since public release of the Draft EIR and General Plan on March 13, 2006, the City has added the following policy to the Natural Resources Element of the General Plan:

Policy NR.1.6 – Participate in the development of a habitat conservation plan to address the unique biological resources in Rancho Cordova.

However, even with the addition of this new General Plan policy, significant biological resource impacts identified in the Draft EIR are still considered significant and unavoidable.

The commenter's proposed General Plan policy of prohibiting approval of any projects within the City limits or the overall Planning Area is considered to be inconsistent with the fundamental objective of the proposed General Plan of the implementation of a land use strategy for the Planning Area that generally reflects Sacramento Council of Government's Blueprint Scenario C and the provision of improved transportation and connection throughout the City, because that a HCP process could take several years (the proposed South Sacramento County Habitat Conservation Plan development process began in the 1990s, with no HCP document released to date). In addition to being in conflict with a fundamental objective of the project, this policy language would result in an immediate de-facto building moratorium for the City that would likely have severe economic impacts to the City. Thus, this proposed mitigation would not meet the definition of "feasible" under State CEQA Guidelines Section 15364.

Response 8-13: While the commenter is correct that the Draft EIR does identify that buildout of the entire Planning Area would result in excedance of currently identified sources of water supply, the Draft EIR does identify adequate water supply to serve buildout of the City within its current boundaries (Draft EIR page 4.9-43 through –45). The potential for limitation to buildout of the Planning Area is far off in the future, thus there is time to address these issues and buildout is subject to many other hurdles (market realities, annexation process) beyond identification of a firm water supply. This situation is counter to the commenter's proposed General Plan policy requiring the immediate development of a HCP prior to development being considered that is contemplated for the near future within the present City boundaries. This policy would in fact result in an immediate de-facto building moratorium that would likely have severe economic impacts to the City and may obstruct a fundamental objective of the project, thus, not meeting the definition of "feasible" under State CEQA Guidelines Section 15364.

*Response 8-*14: Draft EIR pages 4.0-10 and –11 identify seven certified EIRs that are utilized and referred to in several parts of the Draft EIR. As noted in this portion of the Draft EIR, the analysis utilizes both State CEQA Guidelines Sections15148 (Citation) and 15150 (Incorporation by Reference) as means to reduce the size of the Draft EIR (as identified as a concern by the commenter in Comment 8-2), but provides useful technical information. Where information is utilized from these and other documents, a citation and subsequent reference is provided to note where the information originated and that it can be inspected at Rancho Cordova City Hall, consistent with the provisions of both Sections 15150 and 15148.

Regarding comments associated with information referred to in Draft EIR Section 4.9 (Hydrology and Water Quality), the Draft EIR identifies the planned sources of water supply for the City as well as other portions of the County (e.g., Zone 40). These water supply projects are separate projects from the proposed General Plan (all of which commenced prior to the incorporation of the City) and include the Water Forum Agreement, Zone 40 Water Supply Master Plan and the North Vineyard Well Field. Each of these projects had EIRs prepared and certified that disclose the environmental effects pertinent to each project. As specifically identified on Draft EIR pages 4.9-49 and –50, growth under the proposed General Plan would utilize water supply from these projects and would thus contribute to the environmental effects of these projects that were disclosed in their respective EIRs. These indirect environmental effects (specifically those that are significant and unavoidable) to which the proposed General Plan also contributes are specifically brought forward and disclosed in this Draft EIR. The reader is referred to the certified EIRs regarding the details specific to the impacts of these individual water supply projects and adopted mitigation measures.

Response 8-15: Draft EIR Table 4.9-6 specifically notes that residential land use designations under the proposed General Plan would generate the vast majority of water supply demand of the City at buildout, with commercial, office, industrial and mixed-use designations water demands similar to the Parks and Open Space designation (which would consist of active parks and golf course uses that generate large water demands associated with turf irrigation). The Natural Resources designation areas primarily consist of vernal pool and vernal pool grassland habitats in the Planning Area, which would be adversely impacted from the introduction of irrigation (surface water) as noted in the Draft EIR (Draft EIR page 4.10-37 – "Changes in Surface Water Flows"). As noted on Draft EIR pages 4.9-20 and –21, Sacramento County Water Agency planned water supply projects includes both local water supply sources (i.e., Eastern County Replacement Water Supply Project) and regional water supply sources (e.g., Freeport Regional Water Project).

Response 8-16: As identified on Draft EIR pages 4.9-43 through –57, no water supply master planning has been conducted for the buildout of the Planning Area beyond the year 2030. The Draft EIR identifies "additional future water supply options" that could supply buildout of the Planning Area outside of the City's current boundaries as well as potential environmental effects (Draft EIR pages 4.9-46 through –52). However, none of these potential water supply source options have been developed in detail (e.g., no details on infrastructure required) and the exact nature of the environmental effects of these water supply sources are not known. Thus, the development of mitigation measures for these potential water sources at this point would be inappropriate. However, the environmental effects of future development water supply distribution infrastructure within the Planning Area have been programmatically considered in the Draft EIR as part of land disturbance from overall development of the area. It should also be noted that the City does not currently provide water supply services or has any proposed plans at this time to do so. Thus, the

provision and expansion of water supply for future development of the City is expected to continue to be provided by public and private service providers (e.g., Sacramento County Water Agency, Golden State Water Company, and California-American Water Company) and these entities would be required to conduct specific environmental review under CEQA as water supply projects are proposed.

Proposed General Plan Action Item ISF.2.4.1 and ISF.2.4.2 (as modified since public release of the General Plan on March 13, 2006) consist of requirements to ensure that development entitlement requests and subsequent development does not occur until water supply is planned and available consistent with and in excess of state law requirements (SB 610 and SB 221). In addition, the Draft EIR does consider three alternatives to the proposed General Plan that would result in reduced water supply impacts (Sacramento County General Plan Alternative, Existing City Boundary General Plan Alternative and Natural Resources Conservation Alternative) (Draft EIR pages 6.0-5 through –67). The commenter is referred to Response to Comment 8-14 regarding the project's relationship to previously identified significant and unavoidable impacts associated with approved water supply projects and Response to Comment 8-10 regarding use of proposed General Plan policies as mitigation of project impacts. Contrary to the commenter's statement that it is circular for the activities that constitute a project to also mitigate the impacts of that project, a General Plan by its nature as the constitution for development of the City, contains many components that both establish goals for the development of the type, location and intensity of land uses but also contain policies and action items that provide for the mitigation of the impacts of that development (environmental, social, and fiscal). The City intends that the General Plan policies and action items be self-mitigating to the extent feasible. The City has wide discretion in weighing and balancing the competing interests and goals of its constituency.

Response 8-17: While the Draft EIR documents that full buildout of the Planning Area under the proposed General Plan could result in a water supply shortfall of approximately 51,000 acre-feet annually, based on current and planned sources of water supply, this fact does not make the proposed General Plan internally inconsistent. Government Code Section 65300 specifically calls for the development of a long-term general plan for the physical development of the City, and of any land outside its boundaries that, in the City's judgment, bears relation to its planning. The City has complied with this statutory requirement through the development of the proposed General Plan. While the proposed General Plan and Draft EIR have utilized urban water management plans from Sacramento County Water Agency, Golden State Water Company and California American Water Company, consistent with Government Code Section 65302.2, there is no legal requirement under the California Planning and Zoning Law or CEQA that water supply sources be secured for buildout under the proposed General Plan. See *Stanislaus Natural Heritage Project v. County of Stanislaus* ([5th Dist. 1996] 48 Cal.App.4th 182. In that case, the court specifically noted the following, regarding the need for disclosure of

water supply sources and impacts of a proposed project (in that case a General Plan amendment):

> *We are not concluding respondent must find a source of water for the "project". We are concluding that an EIR for this project address the impact of supplying water for the project.*

Id. at 206. The court also recognized that, "While it might be argued that not building a portion of the project is the ultimate mitigation, it must be borne in mind that the EIR must address the project and assumes the project will be built." Id. at 207.

As noted in Response to Comment 8-16, proposed General Plan Action Item ISF.2.4.1 and ISF.2.4.2 (as modified since public release of the General Plan on March 13, 2006) consist of requirements to ensure that development entitlement requests and subsequent development does not occur until water supply is planned and available consistent with and in excess of state law requirements (SB 610 and SB 221).

The commenter suggests that the Draft EIR identified water supply shortfall of 51,000 acre-feet annually probably overly optimistic because of utilization of the 25.6 percent water demand management factor. The 25.6 percent water conservation factor was identified in the WFA Water Conservation Element. It is a reasonable estimate of the water savings that could occur if water purveyors were to adopt statewide Best Management Practices (BMPs) that would result in water conservation. These measures include residential water meters, non-residential meter retrofits, residential and non-residential ultra-low flush toilet replacement program, and other BMPs identifed in the Statewide MOU Regarding Urban Water Conservation BMPs developed by the California Urban Water Conservation Council. Specific BMPs that would be implemented by each purveyor have been identified in their purveyor specific agreement. Specific implementation criteria that indicate the timing of proposed BMPs are also identified in the WFA. The City-County Office of Metropolitan Water Planning (CCOMWP) is the agency responsible for ensuring compliance with the WFA and has an extensive monitoring system in place to monitor the compliance of each purveyor with the terms of their specific agreement. The 25.6 percent conservation level is a long-term assummed water savings and it is based on the evidence and agreements put in place by the WFA. This conservation level was also used in the Zone 40 WSMP when determining water demand within SCWA's service area.

The commenter also suggests that since the WFA EIR did not consider urban development proposed in the General Plan that the Draft EIR improperly defers the impact analysis for the provision of water supply for buildout under the General Plan. As identified in Response 8-16, the Draft EIR does in fact identify "additional future water supply options" that could supply buildout of the Planning Area outside of the City's current boundaries as well as the potential environmental effects associated with supplying that water (Draft EIR pages 4.9-46 through –52). However, none of these potential water supply source options have been developed in

detail (e.g., no details on infrastructure required) and the exact nature of the environmental effects of these water supply sources are not known. The environmental effects of future development water supply distribution infrastructure within the Planning Area have been programmatically considered in the Draft EIR as part of land disturbance from overall development of the area. This analysis is consistent with the *Stanislaus Natural Heritage Project v. County of Stanislaus* ([5th Dist. 1996] 48 Cal.App.4th 182 [55 Cal.Rptr.2d 625]) court case regarding forecasting and disclosure of potential future water supply sources to serve buildout of the General Plan and the associated environmental effects of the potential water supply sources.

Regarding comments of impacts of restricting development on implementation of the overall General Plan and Draft EIR mitigation measures should water supply for portions of the Planning Area outside of the City boundaries not materialize, none of the Draft EIR mitigation measures would be compromised regarding their effectiveness in reducing identified significant impacts (though some mitigation measures [e.g., MM 4.2.1a and b, MM 4.8.5 and MM 4.9.2] would not need to be fully implemented if General Plan growth did not occur in these areas). Current fee programs for planned public service and infrastructure improvements (e.g., roadway improvements) are based on development within the existing City boundaries and would only be expanded upon annexation of new lands into the City. The commenter is referred to Draft EIR Section 6.0 (Project Alternatives) regarding changes in environmental effects should the City not expand its current boundaries and sphere of influence (Draft EIR pages 6.0-20 through –40 – Existing City Boundary Alternative).

Response 8-18 The cumulative impact analysis provided in Draft EIR Section 4.9 (Hydrology and Water Quality) meets the requirements of State CEQA Guidelines Section 15130 (Draft EIR pages 4.9-57 through –66 and pages 4.0-3 through –10). The analysis identifies the geographic extent of the analysis (State CEQA Guidelines Section 15130[b][3]); identifies major development projects and long-range land use planning and development projections (State CEQA Guidelines Section 15130[b][1]; and provides an impact analysis of the combined effects of cumulative baseline conditions and the proposed General Plan (State CEQA Guidelines Section 15130[b][5]). As specifically noted under State CEQA Guidelines Section 15130[b], CEQA does not require that the cumulative impact analysis provide substantive detail regarding the specific nature of each project identified in the cumulative setting. Adequate information has been provided in the Draft EIR to identify that there is inadequate water supply to serve full buildout of development set forth in the proposed General Plan under "project" conditions and that the consideration of additional regional development (e.g., development identified under SACOG Regional Blueprint) would further contribute to the need for additional sources of water supply not currently planned for (Draft EIR pages 4.9-62 and –63). In addition, the Draft EIR does provide an analysis of proposed General Plan policies and mitigation measures that would assist in reducing the General Plan's contribution to this impact

as well as the potential environmental effects of obtaining new water supply sources (Draft EIR Table 4.9-8). The Draft EIR also includes the consideration of three alternatives (Sacramento County General Plan Alternative, Existing City Boundary General Plan Alternative and Natural Resources Conservation Alternative) that would also reduce cumulative water supply impacts (Draft EIR pages 6.0-5 through –67).

Regarding comments associated with the determination of "significant and unavoidable" for cumulative water supply impacts, State CEQA Guidelines Section 15126.2 (b) specifically requires the identification of any significant impacts that cannot be mitigated. Since the water supply impact was identified as cumulative considerable after the application of mitigation measures (an unmitigated cumulative impact), it was appropriately identified as a significant and unavoidable impact of the proposed General Plan.

As noted on Draft EIR page 5.0-1 of Section 5.0 (Cumulative Impacts Summary), this section is a compilation and summarization of all cumulative impacts identified in Draft EIR Section 4.1 through 4.13.

Response 8-19: The commenter misinterprets the discussion on Draft EIR page 4.9-57. The paragraph provided under "Cumulative Setting" is a description of the extent of the cumulative setting conditions, on which that cumulative impact analysis is based. The Draft EIR does not rely on the WFA EIR for an analysis of water supply impacts of the proposed General Plan. Rather, the Draft EIR summarizes the environmental effects of the water supply actions under the WFA that may be used to serve the City. As noted in Response to Comment 8-14, the WFA is separate project from the proposed General Plan (and was commenced prior to the incorporation of the City). The commenter is referred to Response to Comment 8-16 and 8-17.

*Response 8-*20: The commenter is referred to Response to Comment 8-3. The commenter does not refer to specific air quality policies that are at issue or offer any specific recommendations for revisions. Proposed General Plan air quality provisions that include appropriate performance standards include Action AQ.1.1.1, Policy AQ.1.2, Action AQ.1.2.3, Action AQ.3.1.2, AQ.3.2.4, Action AQ.4.1.1, Action AQ.4.2.1, and Action AQ.4.4.1. In addition, the Draft EIR includes additional mitigation measures to address air quality impacts (mitigation measures MM 4.6.3a and b, MM 4.6.4a and b, and MM 4.6.5).

*Response 8-*21: As noted in Response to Comment 8-20, the proposed General Plan includes policies and action items that would reduce air quality impacts. Among them are policies and action items that would assist in reducing emissions associated with ozone (reactive organic gases and nitrogen oxides) (Draft EIR pages 4.6-18 through –20 and 4.6-23 through -27), as well as discussion of the proposed land use pattern that would reduce vehicle miles traveled (Draft EIR pages 4.5-20 through –22). However, the Draft EIR acknowledges that even with the implementation of these policies and action items, there are no feasible measures to completely offset air pollutant increases. This conclusion is based on consultations with the

Sacramento Metropolitan Air Quality Management District and the input of technical consultants associated with the Draft EIR air quality impact analysis.

As noted in the Draft EIR, the City of Rancho Cordova is located in the Sacramento Valley Air Basin (SVAB). Emissions from the urbanized portion of the SVAB (Sacramento, Yolo, Solano, and Placer Counties) dominate the emission inventory for the Sacramento Valley Air Basin. Within the urbanized portion of the SVAB, on-road motor vehicles are the primary source of existing and future emissions. Between 1980 and 2020, population in the SVAB is projected to grow at a higher rate than the statewide average, a 125 percent increase compared with a 93 percent increase statewide; population is projected to grow from 15 million in 1980 to 34 million in 2020. During this same period, the increase in the number of vehicle miles traveled each day is projected to be higher than the overall statewide value: a 201 percent increase in the SVAB. Vehicle miles traveled are projected to increase from nearly 28 million miles in 1980 to 84 million miles in 2020 (California Air Resources Board, 2006).

The 1994 Sacramento Regional Clean Air Plan (CAP), also called the State Implementation Plan or SIP, was developed cooperatively with all the districts in the Sacramento Region (El Dorado APCD, Feather River AQMD, Placer County APCD, Sacramento Metropolitan AQMD, and Yolo-Solano AQMD). The CAP/SIP promotes active public involvement, enforcement of compliance with SMAQMD rules and regulations, public education in both the public and private sectors, development and promotion of transportation and land use programs designed to reduce vehicle miles traveled within the region, and implementation of stationary and mobile-source control measures. The emission inventories identified in the CAP/SIP are based, in part, on projected population forecasts and corresponding increases in vehicle miles traveled developed by the Sacramento Area Council of Governments (SACOG). These forecasts are based on data obtained from local jurisdictions.

As previously described, the proposed General Plan includes policies and implementation measures that would ensure continued compliance with the CAP/SIP emissions inventories. The CAP/SIP is required to include all feasible measures sufficient to achieve ambient air quality standards. The City of Rancho Cordova General Plan includes numerous policies and action items designed to implement the measures identified in the SIP, in accordance with SMAQMD's recommendations. However, emissions from mobile sources, the largest contributor to emissions within the SVAB, are regulated by the California Air Resources Board. Local governments do not have legal authority to regulate vehicle emissions. The City would, however, implement measures (through the proposed General Plan) to reduce mobile source emissions associated with future development; including, but not limited to, the promotion of alternatives to motor vehicle use (e.g., improved bicycle, transit and pedestrian facilities and services), use of clean-burning alternative-fueled vehicles, ridesharing, and smart growth development that helps to reduce overall vehicle trips and miles traveled. Based on discussions with SMAQMD, offset fees may

be required to mitigate indirect emissions associated with future development. However, the SMAQMD does not currently have an adopted emissions offset plan for indirect source emissions.

The Draft EIR also includes the consideration of three alternatives (Sacramento County General Plan Alternative, Existing City Boundary General Plan Alternative and Natural Resources Conservation Alternative) that would reduce air quality impacts (Draft EIR pages 6.0-5 through –67). The commenter provides no evidence or data to counter this conclusion in the Draft EIR regarding the ability to completely offset air pollutant emissions associated with General Plan buildout. The commenter is referred to Response to Comment J-2 regarding the proposed General Plan's consistency with development assumptions being utilized in the update of the Regional Ozone Attainment Plan.

Response 8-22: The Draft EIR impact analysis is based on evaluating worst case conditions associated with the implementation of the proposed General Plan, which is full buildout. The commenter's proposed mitigation of phasing development associated with meeting air quality standards would not mitigate anticipated air pollutant emissions at buildout. Prohibition of development until regional attainment of state and federal air quality standards would be inconsistent with the fundamental aspects of the proposed General Plan--the implementation of a land use strategy for the Planning Area that generally reflects Sacramento Council of Government's Blueprint Scenario C (which provides an improved land use pattern in regards to air quality impacts), and the provision of improved transportation and connection throughout the City. This would result in a building moratorium for the City that would likely have economic impacts to the City. Thus, this proposed mitigation would not meet the definition of "feasible" under State CEQA Guidelines Section 15364. Proposed General Plan Policy AQ.1.2 (below) currently incorporates many of the commenter's ideas regarding the review of proposed development projects in relation to project impacts to the region's ability to meet state and federal air quality standards.

> *Coordinate with SMAQMD through the environmental review process to ensure that proposed projects would not significantly affect the region's ability to meet State and federal air quality standards.*

The commenter is referred to Response to Comment J-2 regarding the proposed General Plan's consistency with development assumptions being utilized in the update of the Regional Ozone Attainment Plan.

Response 8-23: The commenter is referred to Response to Comment 8-22 and J-2. There are no provisions in the proposed General Plan that would "grandfather" any land uses from future changes in air quality mitigation requirements.

Response 8-24: The commenter is referred to Response to Comment 8-22 and J-2. Draft EIR Mitigation Measure MM 4.6.4a and b would modify and add policies to the General Plan regarding toxic air emissions and sensitive receptors. However, the Draft EIR acknowledges that they would not fully offset toxic air emissions or exposure, given the current existence of major roadways

in the Planning Area (e.g., Sunrise Boulevard and U.S. Highway 50) that already generate air toxic contaminants near sensitive receptors, planned roadway improvements, and the continued operation of Mather Airport and the associated unknown exposure issues with emissions from the airport.

Response 8-25: As identified on Draft EIR page 4.6-11, the Sacramento Regional Ozone Attainment Plan is being updated in order to respond to the federal Clean Air Act conformity lapse as well as to address the new federal 8-hour ozone standard. While land uses proposed in the General Plan are not reflected of those used in the 1994 Regional Ozone Attainment Plan. However (as identified in Response to Comment J-2), the proposed General Plan land uses **are** within the land use projections (SACOG Preferred Blueprint Scenario) being utilized in the update. Impact 4.6.1 (Conflict with the SMAQMD Regional Ozone Attainment Plan) in the Draft EIR incorrectly compared land use projections for the area defined as the Rancho Cordova Community by SACOG, to the proposed General Plan land use projections, which do not consist of the same geographic area as the Planning Area for the City of Rancho Cordova General Plan. When one compares land use designations and associated projections for the SACOG Preferred Blueprint Scenario and the proposed General Plan for the same geographic area (Planning Area for the City of Rancho Cordova General Plan), the proposed General Plan buildout would result in 16,856 fewer dwelling units and 40,892 fewer jobs than the SACOG Preferred Blueprint Scenario (rather than nearly 14,000 more dwelling units and more than 50,000 additional jobs). The text of the Draft EIR will be revised to reflect this change, which does not change the significance finding of this impact (Impact 4.6.1). Thus, the proposed General Plan land uses are not anticipated to conflict with the proposed update of the Sacramento Regional Ozone Attainment Plan.

Regarding potential conflicts with state ozone standards, the Draft EIR utilizes significance criteria that address state ozone standards (standards of significance [3] on Draft EIR page 4.6-15). In addition, Draft EIR impacts 4.6.1 and 4.6.3 specifically note that increased air pollutant emissions associated with the implementation of the proposed General Plan could exceed state air quality standards (Draft EIR pages 4.6-16 and 4.6-21).

Response 8-26: The cumulative impact analysis provided in Draft EIR Section 4.6 (Air Quality) meets the requirements of State CEQA Guidelines Section 15130 (Draft EIR pages 4.6-33 through –38 and pages 4.0-3 through –10). The analysis identifies the geographic extent of the analysis (State CEQA Guidelines Section 15130[b][3]); identifies major development projects and long-range land use planning and development projections (State CEQA Guidelines Section 15130[b][1]; and an impact analysis of the combined effects of cumulative baseline conditions and the proposed General Plan (State CEQA Guidelines Section 15130[b][5]). As specifically noted under State CEQA Guidelines Section 15130[b], CEQA does not require that the cumulative impact analysis to provide substantive detail regarding the specific nature of each project identified in the cumulative setting. Adequate information has been provided in the Draft EIR to identify that the proposed General Plan would generate substantial air

pollutant emissions at buildout (Draft EIR Table 4.6-3) and that the consideration of additional regional development (e.g., development identified under SACOG Regional Blueprint) and current air quality conditions (severe non-attainment area for federal ozone standards) would further contribute to regional air quality impacts (Draft EIR pages 4.9-33 and –34). In addition, the Draft EIR does provide an analysis of proposed General Plan policies and mitigation measures that would assist in reducing the General Plan's contribution to this impact. The Draft EIR also includes the consideration of three alternatives (Sacramento County General Plan Alternative, Existing City Boundary General Plan Alternative and Natural Resources Conservation Alternative) that would also reduce cumulative air quality impacts (Draft EIR pages 6.0-5 through –67).

Response 8-27: As identified in Draft EIR Section 3.0 (Project Description), the proposed General Plan includes expansion of transit facilities and services in the City through the utilization of existing light rail corridor (Draft EIR Figure 3.0-21); expansion of trails and bikeways in the City (Draft EIR Figure 3.0-20); and the utilization of smart growth planning principles in the development of the General Plan Land Use Map and Planning Area land use plans that provide for a variety of transportation choices (Draft EIR pages 3.0-9 and –10). The Draft EIR traffic impact modeling factored the proposed General Plan transit improvements into the roadway level of service impact analysis (Draft EIR page 4.5-25).

Response 8-28: As identified in Response to Comment 8-27, the proposed General Plan includes transit, bicycle and pedestrian improvements in existing developed portions of the City (Draft EIR Figure 3.0-20 and 3.0-21). The proposed General Plan includes revitalization of existing developed areas of the City (e.g., Folsom Boulevard Planning Area) through the use of smart growth principles that provide a variety of transportation choices (Draft EIR pages 3.0-9 and –10) and would be further implemented through the proposed Rancho Cordova Redevelopment Plan (anticipated to the approved in June 2006).

Regarding the commenter's statements regarding the widening of key intersections, the Draft EIR does not include any impact discussion regarding intersections. The Draft EIR does acknowledge that several roadways (Sunrise Boulevard, Folsom Boulevard, Mather Field Road, Zinfandel Drive, Hazel Avenue and Bradshaw Road) could not be feasibly further widened, due to conflicts with the City's determination that roadways over six lanes in size would conflict with pedestrian and bicycle use and result in a "barrier effect" that divides portions of the City as well as existing right-of-way constraints associated with existing businesses (Draft EIR pages 4.5-42 through –45).

Response 8-29: The commenter is referred to Response to Comment 8-2. Comments submitted after the close of the Draft EIR comment period will be considered by the City, but not responded to in the Final EIR.

Response 8-30: The commenter is referred to Response to Comment 8-3, 8-4, 8-5, 8-6, 8-7, 8-8, 8-10, 8-11, and 8-12.

Response 8-31: The commenter is referred to Response to Comment 8-16, 8-17, 8-18, 8-20 through 8-26 and 8-28. The proposed General Plan does include policies and action items that promote transit, pedestrian and bicycle facilities and uses (Draft EIR pages 4.5-49 through –53).

Letter 9

From the GP mailbox...

City of Rancho Cordova
General Plan and Environmental Impact Report
generalplan@cityofranchocordova.org
General Plan Manager - Pam Johns
General Plan EIR Manager - Pat Angell
2729 Prospect Park Drive
Rancho Cordova, CA 95670

From: Sara Provancha [mailto:sara@jasdevelopments.com]
Sent: Mon 5/8/2006 11:38 AM
To: sara@jasdevelopments.com
Subject: City of Rancho Cordova - General Plan Web Comment

City of Rancho Cordova - General Plan Web Comment

this message was send from gp.cityofranchocordova.org

Name: Sara Provancha
Email: sara@jasdevelopments.com
Comments: We have previously requested the inclusion of three of our properties in the Rancho Cordova General Plan. I understand that the city council will be reviewing modifications to the plan on May 15th, and want to make sure we have provided all the information needed to be considered. Our properties APN's are as follows: APN 073-0010-020; APN 073-0040-014; and APN's 073-0050-017, 073-0070-004, 073-0080-048. Please feel free to email me or call our office at (916) 648-1100 if you have any questions, or need additional information. Thank you, Sara Provancha JAS Developments, Inc. 2277 Fair Oaks Blvd., Suite 295 Sacramento, CA 95825 sara@jasdevelopments.com 9-1

Letter 9Sara Provancha, Property Owner

Response 9-1: The commenter's statements and input regarding the General Plan are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR and no further response is required. However, the General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan.

Letter 10

Pam,

For consideration as we finalize the Draft GP.

Paul

-----Original Message-----
From: Elke Guenter [mailto:elkeg@sbcglobal.net]
Sent: Monday, May 15, 2006 3:01 PM
To: Paul Junker
Subject: Recommendations for draft EIR and General Plan

I would like to submit the following comments:

1. The GP does not guide the protection or usage of Natural Resources with any enforceability. | 10-1

2. There are no enforceable policies to protect or preserve special status species. | 10-2

3. The Open Space Element does not contain an action program as required to preserve open space. In addition, there are inconsistencies in the dedication of parkland. | 10-3

4. The draft EIR contains vague mitigation measures. | 10-4

Additionally, I would like to see incorporation of other existing guidelines, including the HCP as well as Fish and Game Ordinances. | 10-5

Respectfully submitted,
Elke Guenter
10817 Ambassador Dr.
Rancho Cordova

Letter 10 Elke Guenter, Resident

Response 10-1: The commenter is referred to the Draft EIR pages 4.10-39 through 66 that lists policies and action items contained in the General Plan Natural Resources Element intended to both guide the use of natural resources and protect natural resources that could be affected by implementation of the Rancho Cordova General Plan. The Draft EIR contains a thorough review of those proposed policies and action items and in some cases, provides for mitigation measures in the form of new or revised policies and action items to further enhance the comprehensiveness and enforceability of these measures designed to guide the use and protection of direct, indirect and cumulative potential effects to Natural Resources. The commenter does not provide any specificity with regard to perceived lack of enforceability of the proposed General Plan policies, action items or mitigation measures nor does the comment provide any substantial evidence to support that the policies, action items or mitigation measures are not enforceable.

Response 10-2: Please refer to Response to Comment 8-3 regarding special status species. The commenter does not provide any specificity with regard to perceived lack of enforceability of the proposed General Plan policies, action items or mitigation measures nor does the comment provide any substantial evidence to support that the policies, action items or mitigation measures are not enforceable.

Response 10-3: The Draft EIR provides a summary list on pages 4.12-91 through 4.12-95 of the policies and action items contained in the Open Space, Parks and Trails Element of the proposed General Plan that address land dedication, development and funding of park, open space, and recreational facilities to serve Rancho Cordova residents. In particular, Action item OSPT.2.1.1 requires that the City adopt mandatory performance based standards that clearly define the City's requirements for open space in new development. Action OSPT.1.1.1 requires developers of all new residential development to dedicate parkland at a rate of five acres of land per 1,000 population. Action item OSPT.2.1.2 requires all new residential development to dedicate parkland at a rate of 1.75 acres of land per 1,000 population, generally comprised of: Open Turf, Tree Canopy and Dog Parks; Neighborhood Greens; and Communitywide Open Space. Please see Response 8-3 regarding the appropriateness of performance standards for this type of project, a General Plan. The commenter also states that there are inconsistencies in the dedication of parkland but provides no detail supporting this assertion. The commenter is also referred to Response to Comment 8-7.

Response 10-4: Please see Response to Comment 8-3 regarding the appropriateness of performance standards for this type of project, a General Plan. The commenter states that the "draft EIR contains vague mitigation measures." The commenter does not identify those mitigation measures that are perceived to be vague and no detail is provided supporting this assertion.

Response 10-5: The Draft EIR, page 4.10-30 describes the South Sacramento Habitat Conservation Program (SSHCP) that is currently being developed by several public agencies and other interested stakeholders. The Draft EIR notes: "The City of Rancho Cordova is a participating agency in the SSHCP, and may ultimately become a permittee under the SSHCP. Currently, the SSHCP is a draft; however, it is considered at length in this EIR in part because there are no adopted habitat conservation plans applicable to the Planning Area." Please also refer to Response to Comment 8-11.

The Draft EIR, section 4.10.2 Regulatory Framework, contains a detailed description of the federal, State, and local environmental laws, policies, plans, and agencies that are relevant to the proposed General Plan and the Planning Area. This section describes at length the applicable code requirements of the U.S. Fish and Wildlife Service and the California Department of Fish and Game, as well as other agencies. Compliance with all federal and state regulations pertaining to wetlands and special status species is a mandatory part of the land development process. The Draft EIR notes that future proposed projects that have the potential to cause a direct or reasonably foreseeable indirect physical change in the environment will undergo additional, project-specific CEQA-review, as required by statute. Those future projects will also be subject to the federal and state Endangered Species Acts, as appropriate. Proposed polices and actions items NR 1, NR 1.2, NR 2.1 address compliance with federal and state regulations pertaining to wetlands and special status species. Please also refer to Response to Comment 8-12.

Letter 11

Mr. Pat Angell – May 11, 2006 Comments on Rancho Cordova General Plan EIR

From: Victoria Harris
2216 Rossmoor Drive
Rancho Cordova, 95670

MAY 19 2006

To: Pat Angell, Environmental Manager, City of Rancho Cordova

Date: May 11, 2006

RE: Comments on March 2006 Public Draft EIR, Rancho Cordova General Plan

General Comment. This entire DEIR is written as if it has been pre-determined that the City will approve the proposed general plan. It is completely biased in favor of the project. There are so many impacts that are just dismissed as being significant and unavoidable with no real analysis to support the findings. It reads like, hey folks we (the City) want this amount of development in this configuration which will have these impacts, but there is nothing that can be done about it. The DEIR is inadequate in providing the public with information on how the significant unavoidable impacts can be mitigated. And, none of the alternatives offer any solutions to the many significant unavoidable impacts of the proposed project. 11-1

I have a hard time believing that Rancho Cordova will be a vibrant destination when citizens and visitors will be stuck in traffic, breathe polluted air, be surrounded by acres of boring subdivisions stretching out into what used to be open grasslands and agricultural fields, and lose beautiful views of the surrounding foothills and Sierras due to smog. This is the story that the DEIR tells us. It offers no solution to prevent such impacts. It is a flawed document.

Project Description and Land Use

The DEIR falsely describes future development in the City as being diverse to provide opportunities to all classes of citizens (low, medium and high income). According to Table 3-02, only 4,400 acres will be in low to medium density residential development, while over 22,000 acres will be in low, rural and estate residential development. The latter will only be affordable to higher income residents. This is not mixed. This is suburban sprawl. This is changing the face of the City. This is dividing the City. This is a contradiction that must be analyzed in the DEIR. The premise that the project will not divide the community is also flawed. The giant homes that will be built up south of I-50 out by Anitolia and beyond in the vernal pool grasslands will be completely different from the existing small homes in the inner Rancho Cordova (all along Coloma and Folsom Boulevard). The folks that live in the giant homes will be separated from the low and medium income folks in the poorer neighborhoods. It will be like Gold River over there. So the DEIR should tell it like it will be and not paint a favorable picture that just is not realistic. 11-2

1

Letter 11 Continued

Mr. Pat Angell – May 11, 2006 Comments on Rancho Cordova General Plan EIR

Also the folks that buy the giant homes in the new suburbs will have to have existing jobs somewhere else and not in Rancho Cordova. One does not relocate when they have high mortgages, they must have jobs, and high paying one somewhere. And they will commute by car. The trains will be used by the poor and middle income state workers that go downtown. Let' be realistic here. The DEIR must be realistic. If this is incorrect, provide the evidence in the DEIR so that I can see how it will work. Otherwise I just don't believe it. 11-3

Comments on Biological Section

The DEIR discusses the Federal Endangered Species Act (ESA), however, it fails to analyze the project's impact on the federally listed species and how the conflict with the ESA will be addressed. The conclusion in the DEIR that impacts on listed species are significant, unavoidable and unmitigatable conflicts with the directive of the ESA to not jeopardize the long-term survival of the listed species. 11-4

The DEIR fails to discuss designated critical habitat for some of the listed species, such as the Vernal Pool Tadpole shrimp. It also fails to analyze the impact on such critical habitat.

The DEIR makes no attempt to determine how development could avoid impacts to the listed species by identifying specific areas of conflict between the listed species occurrences and where development is proposed. The DEIR must address the locations of specific areas of habitat and include criteria on how to avoid or minimize take of the species. To just dismiss the impacts as significant, unavoidable and unmitigatable is contrary to what a DEIR is meant to provide to decision makers. 11-5

Since this is a general plan DEIR, it must assess how the impacts of habitat loss can be mitigated throughout the plan area. The City should not wait and have each individual developer mitigate impacts. This is contrary to the basic principles of conservation biology. The City in this DEIR should outline proposed habitat reserves in advance of identifying development areas. If the City fails to address the "big picture" now, the ability to provide mitigation will be severely compromised. 11-6

It is totally unacceptable for the City to rely exclusively on off-site conservation. The development in Rancho Cordova, must be mitigated within the City if there area areas within the City that warrant protection. The DEIR does not provide enough information for the reader to determine which areas warrant protection and which areas do not. 11-7

The DEIR fails to provide an estimate of the number of acres of loss of the habitat for each of the federally, state, and species of special concern that would take place under proposed general plan build out. The reader does not know the order of magnitude of the habitat loss. 11-8

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Letter 11 Continued

Mr. Pat Angell – May 11, 2006 Comments on Rancho Cordova General Plan EIR

The proposed general plan policies that are meant to provide mitigation on biological resources are in direct conflict with the finding of the DEIR that impacts will be significant and unavoidable and cannot be mitigated. The policies are so general as to be worthless. There is no way to measure the success of these policies. The policies, if used as a basis for mitigating impacts, must be reworked so that they can be measures and monitored. I have attached proposed rewording of some natural resource policies. 11-9

The DEIR fails to provide mitigation that is feasible and that is that the City must consult with the USFWS and must obtain incidental take permits for take of federally listed species. The incidental take permit must be supported by a habitat conservation plan that includes a conservation program and mitigates loss of listed species to the maximum extent practicable. Without such a permit, the City cannot proceed with issuing permits to build on listed species habitat. 11-10

MM 4.10 1b, last paragraph, should read "the City shall develop or participate in a habitat conservation plan in order to mitigate impacts on federally listed species." 11-11

Below are suggested edits to the Natural Resource Policies

Goal NR 1- Protect and preserve diverse wildlife and plant habitats, including habitat for special status species, in the context of a regional conservation program and assure that any and all losses of listed species habitat has been minimized and mitigated in accordance with State and Federal Endangered Species Acts.

Policy NR 1.1.1 – Mitigate impacts on state and federally listed species through participation in a habitat conservation plan and MOU with the California Department of Fish and Game.

Policy NR 1.1.2 – Identify natural resource conservation envelopes based on sound scientific principles of conservation biology with the objective of meeting both the biological requirements of the sensitive and covered species in Rancho Cordova as well as providing for the long term conservation of the areas natural communities. 11-12

Policy NR 1.1.3- Require developers of all new development to design projects to avoid existing aquatic resources and endangered species habitat in the conservation envelope. Development and associated impacts would be concentrated in the development envelope. Natural resource avoidance within the development envelope would be limited to stream corridor set backs, wetlands adjacent to streams, and Low Impact Development Strategies (LIDS) incorporated into project design.

Policy NR: 1.1. 4 - Any actual loss of natural resources from new development shall be compensated in accordance with the habitat conservation plan and MOU.

Policy NR 1.1.5 Assure that new development pays for the long-term maintenance and management of the conserved habitat.

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Letter 11 Continued

Mr. Pat Angell – May 11, 2006 Comments on Rancho Cordova General Plan EIR

Policy NR 1.1.6 Conservation areas shall be primarily managed for the benefit of the listed species.

Also consider adding an Interim Ordinance for Vernal Pool Preservation

Policy NR 1.1.7 Protect and Preserve vernal pool grasslands prior to finalization of the HCP

Action: Establish an Interim Vernal Pool Preservation Ordinance that sets forth an interim strategy for conserving vernal pools in Rancho Cordova.

Goal NR—2 Preserve and protect the City's rich and diverse vernal pools and other natural wetlands in the context of a regional conservation program

Policy NR 2.1. – Mitigate impacts on jurisdictional wetlands through participation in a habitat conservation plan that meets the least environmentally damaging practicable alternative (LEDPA) requirements of the USACE and the EPA. Establishing a regional LEDPA with a system of large, connected conservation reserve areas under the HCP allows the regulated community to comply as a whole with avoidance requirements of the Federal Guidelines promulgated under CWA §404(b)(1).

11-12 cont.

Policy NR 1.1.2 – Identify natural resource conservation envelopes based on sound scientific principles of conservation biology with the objective of meeting the biological requirements of the vernal pool wetlands.

Policy NR 1.1.3- Require developers of all new development to design projects to avoid existing vernal pools wetlands in the conservation envelope. Development and associated impacts would be concentrated in the development envelope. Wetland avoidance within the development envelope would be limited to stream corridor set backs, wetlands adjacent to streams, and Low Impact Development Strategies (LIDS) incorporated into project design.

Policy NR: 1.1. 4 - Any actual loss of wetlands from new development shall be compensated in accordance with the habitat conservation plan and MOU and requirements of the USACE LEDPA.

Policy NR 1.1.5 Assure that new development pays for the long-term maintenance and management of the conserved habitat.

Goal NR 3. Preserve and maintain creek corridors and wetland preserves with biologically defensible buffer zones, but that allow passive recreational use

Comments on Transportation

The DEIR correctly identifies many of the traffic impacts as significant and unavoidable with general plan growth. However, I believe it fails to discuss reduced development as a 11-13

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Letter 11 Continued

Mr. Pat Angell – May 11, 2006 Comments on Rancho Cordova General Plan EIR

means to eliminate the traffic impacts. There must a level of development that would minimize the traffic impacts to less than significant levels. Again just to dismiss the impacts of growth as significant and unavoidable with no discussion of what can be done to prevent this is a major flaw of the DEIR. Also to rely on bicycles and waling to help alleviate the traffic problems is not realistic, particularly in the summer when temperatures can reach 100 degrees during the day. Riding bicycles and walking are limited during the hot summer except in the early mornings and late evenings. 11-13 cont.

Comments on Alternatives

According to CEQA "a draft EIR must describe a reasonable range of feasible alternative to the project or project location that could feasibly attain most of the basic project objectives and would avoid or substantially lessen any of the significant environmental impacts of the proposed project." The DEIR fails to do this. None of the alternatives reduces the significant unavoidable environmental impacts to less than significant levels (refer to Table 6-1). This is a major flaw in the DEIR. The City must do a better job in coming up with alternatives that reduce significant unavoidable impacts. Or come up with feasible mitigation measures.

Even the so called "natural resources conservation alternative" does not do what it is called out to do ant that is conserve natural resources. One would think that such an alternative would at the very least reduce impacts on natural resources to less than significant levels. It does not. And even this small attempt at conserving additional resources is dismissed as not meeting the project objectives and not recommended for approval over the project. 11-14

The alternative analysis needs to be totally reworked. The natural resource alternative must be expanded to include potential preserve areas that would fit into a habitat conservation plan. It must be developed in consultation with the USFWS, CDFG, and conservation biologists that understand how to develop a reserve system that will sustain listed species in the long-term.

The City should also consider urban development in the existing City limits and not the expanded study area (Alternative 2). Of all of the alternatives this one seems to have the least impacts. This would also allow the City time to work out how natural resources can be conserved in a regional setting and in a configuration that meets the principles of sound conservation biology. This would provide more time for an HCP to be developed.

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Letter 11 **Victoria Harris, Habitat 2020**

Response 11-1: An environmental impact report is an informational document for the purpose of providing public agencies and the public with information about the effect that a proposed project is likely to have on the environment, to list ways in which the significant environmental effects of that project can be minimized where feasible, and to indicate alternatives to the project that could reduce or eliminate the identified environmental impacts (Public Resources Code Section 21061). The project considered in this Draft EIR is the Rancho Cordova General Plan, Public Draft. The Draft EIR analyzes the General Plan as currently proposed in terms of it's potential environmental effects and does not make any assumption or contain any bias in terms of the outcome of the lead agency's decision to approve or disapprove the proposed General Plan.

In every case where it is concluded in this Draft EIR that an impact is significant and unavoidable, all known feasible mitigation measures have first been identified and applied. The determination that a significant impact is unavoidable is only made in the case where after application of all feasible mitigation measures, there would still be a residual significant impact to the environment if the City of Rancho Cordova were to decide to approve the proposed General Plan. Alternatives to the project as proposed have also been evaluated in the Draft EIR, consistent with State CEQA Guidelines 15126.6, that are oriented to a reasonable range of alternatives to the General Plan land uses proposed that could reduce significant environmental impacts while still meeting the basic objectives of the project. A fundamental aspect of the proposed General Plan is the implementation of a land use strategy for the Planning Area that generally reflects Sacramento Council of Government's Blueprint Scenario C and the provision of improved transportation and connection throughout the City.

The commenter provides an opinion regarding the outcome of the adoption of the proposed land use strategy. The comment is noted and forwarded to the decision makers for their consideration.

Response 11-2: An environmental impact report is an informational document for the purpose of providing public agencies and the public with information about the effect that a proposed project is likely to have on the physical environment (CEQA does not require an evaluation of purely economic or social effects of a project - State CEQA Guidelines Section 15131[a]), to list ways in which the significant environmental effects of that project can be minimized where feasible, and to indicate alternatives to the project that could reduce or eliminate the identified environmental impacts (Public Resources Code Section 21061).

A search of the DEIR was completed to determine if the document "falsely described development in the City as being diverse to provide opportunities to all classes of citizens". This statement was not found nor were any other statements concerning the housing opportunities for the

various income ranges, other than descriptions of the pertinent General Plan element and a reiteration of the General Plan goals, policies and actions. Regarding the physical division of established communities, Draft EIR pages 4.1-38 through –41 specifically address this impact and determine it to be less than significant. The proposed General Plan would provide for revitalization of existing urban areas of the City as well as improved roadway, pedestrian and bicycle access throughout the entire Planning Area (see Draft EIR Figures 3.0-19 through 3.0-21).

The commenter provides an opinion regarding the outcome of the adoption of the proposed land use strategy. The comment is noted and forwarded to the decision makers for their consideration.

Response 11-3: The commenter is referred to Response to Comment 11-2 as well as Draft EIR pages4.5-20 through –21 that identifies that the proposed General Plan would result in reduced vehicle miles outside of the City as a result of the proposed land use mix.

Response 11-4: The Draft EIR contains clear descriptions and mapping of existing habitat conditions in the Planning Area (see Draft EIR pages 4.10-1 through –28) as well as the methodology and anticipated worst case direct and indirect impacts to habitat conditions (including habitats recently designated as "critical"), state and federally listed plant and wildlife species and associated biological resources including habitat impact estimates (Draft EIR pages 4.10-32 through –68).

Response 11-5: The commenter is referred to Response to Comment K-3, 8-3, 8-4, 8-5, 8-11 and 8-12.

Response 11-6: Draft EIR Section 4.10 (Biological Resources) does address impacts and mitigation to biological resources of the entire Planning Area and sets forth performance standard policies, action items and mitigation measures to reduce these impacts. Since public release of the Draft EIR and General Plan on March 13, 2006, the City has added the following policy to the Natural Resources Element of the General Plan:

Policy NR.1.6 – Participate in the development of a habitat conservation plan to address the unique biological resources in Rancho Cordova.

The commenter is referred to Response to Comment K-2 8-3, 8-4, 8-5, 8-11 and 8-12.

Response 11-7: The Draft EIR does not state the City shall rely only on off-site conservation for the loss of biological resources associated with the implementation of the proposed General Plan. The commenter is referred to Response to Comment K-2 and K-3 regarding habitat data provided in the Draft EIR.

Response 11-8: The commenter is referred to Response to Comment 11-4.

Response 11-9: The commenter's statements and input regarding the General Plan are noted. These comments are associated with the General Plan and are not related to the adequacy of the Draft EIR. The General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Response to Comment 8-3 regarding performance standards set forth in the proposed General Plan policies and action items.

Response 11-10: The commenter is referred to Response to Comments 8-4, 8-12 and 11-6.

Response 11-11: The commenter is referred to Response to Comment 11-6.

Response 11-12: The commenter's statements and input regarding the General Plan are noted. These comments are associated with the General Plan and are not direct related to a comment on the adequacy of the Draft EIR. The General Plan staff report for the June 8, 2006 Rancho Cordova Planning Commission will include consideration of comments received on the General Plan. The commenter is also referred to Response to Comment 8-3, 8-4, 8-5, 8-11 and 8-12. Several of the proposed edits to the Natural Resources Element could be considered to be inconsistent with the fundamental aspects of the proposed General Plan of the implementation of a land use strategy for the Planning Area that generally reflects Sacramento Council of Government's Blueprint Scenario C and the provision of improved transportation and connection throughout the City, given that the proposed provisions associated with complete wetland avoidance would substantially restrict proposed General Plan land uses in the City.

Response 11-13: The Draft EIR is intended to evaluate the physical environmental impacts of General Plan as proposed. However, the DEIR does consider three alternatives that include reduced development under the proposed General Plan (see Draft EIR Section 6.0 – Project Alternatives).

Response 11-14: The alternatives analysis provided in Section 6.0 (Project Alternatives) of the Draft EIR is consistent with the State CEQA Guidelines Section 15126.6. CEQA does not require that the alternatives considered completely avoid significant impacts identified for the proposed project. Rather, it requires that alternatives be considered at are capable of avoiding or substantially lessening any of the significant effects of the project. As Identified in Draft EIR Table 6.0-1, each of the alternatives considered provides some environmental benefit over the proposed General Plan.

Regarding comments on the Natural Resources Alternative, as noted on Draft EIR page 6.0-40 this alternative is based on consultations with Sacramento County staff currently preparing the South Sacramento Habitat Conservation Plan and utilization of a conceptual-level strategy for the Sunrise-Douglas Community Plan Area developed by the U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers. The Draft EIR does not dismiss this alternative (as suggested by the commenter). Rather, the Draft EIR notes its consistency

with project objectives and does note that it is an environmentally superior alternative when compared to the proposed General Plan.

The commenter's general support for Alternative 2 (Existing City Boundary General Plan Alternative) is noted.

Letter 12

WALKSACRAMENTO
Walkable Communities = Communities of Walkers

May 9, 2006

MAY 19 2006

City of Rancho Cordova
Patrick Angell, EIR Manager
2729 Prospect Park Drive
Rancho Cordova, CA 95670
RE: Rancho Cordova General Plan EIR

Dear Mr. Angell:

WALKSacramento is pleased to offer comments on the draft Rancho Cordova General Plan EIR.

The growth in Rancho Cordova will clearly have significant traffic and air quality impacts. The impacts can be partially mitigated by fully completing the street network with pedestrian and bicycle facilities. The EIR should analyze the General Plan with a circulation element that assumes a complete network for bicycles and pedestrians and a resulting increased mode share for walking and biking and reduced share for motor vehicle trips.

Literature shows that communities with safe, complete networks for walking and biking have many more people who use walking and biking for short trips. We would be happy to supply literature if needed to support the EIR document. We also encourage you to utilize Sacramento Area Council of Governments' modeling for this type of project to assist in estimating it's air pollution emission reductions and traffic reductions. 12-1

In order to successfully complete the street network and mitigate the impacts to air quality and circulation, we recommend the following revisions and additions to the Circulation Element's goals, policies, and actions.

1. Goal C.1: *Develop a roadway system that accommodates future land uses at the City's desired level of service, provides multiple options for travel routes, protects residential areas from excessive traffic, coexists with other travel modes, and contributes to the quality of the City's residential, commercial, office, and industrial areas.*

909 12th Street, Suite #122 • Sacramento, CA 95814 • 916.446.9255 • fax 916.443.9255
www.walksacramento.org

Letter 12 Continued

We recommend adding a policy and action that addresses gaps in the pedestrian network. For example, in the Stone Creek development, Navigator Elementary School is planning to open in the fall of 2006 and there are already many families living within a quarter mile. Yet North of the school is undeveloped property without sidewalks. If the brunt of new sidewalk construction is on the developer or school and noncontiguous construction is allowed to occur, the City must provide a short-term solution to address such system gaps. For example, the City could or require a developer to lay a simple, affordable, and temporary asphalt pathway to link existing sidewalks.

2. Policy C.1.2: *Seek to maintain operations on all roadways and intersections at Level of Service D or better at all times, including peak travel times, unless maintaining this Level of Service would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals…* and C.1.3: *Recognize that regional traffic beyond the City's control…will make it infeasible to achieve the City's Level of Service on all roadways…*

   WALKSacramento supports the policies related to Level of Service (LOS), but encourages the adoption of an additional policy that was recommended by the Sacramento Metropolitan Air Quality Management District in their April 21st General Plan comments. We offer slightly different language. 12-1 cont.

   "Should the City decide that roadway widening is feasible and desirable, it will fulfill its commitment to complete streets along that segment or intersection by incorporating all unfunded bicycle and pedestrian projects within ¼ mile of the roadway into the improvement plan for the road segment. Unfunded projects shall include, but not necessarily be limited to infrastructure identified in an adopted Bikeway Master Plan or Pedestrian Master Plan. The City shall fund all identified bicycle and pedestrian projects prior to allocating funds for the roadway project."

   This policy will assure that as roadways are improved they are retrofitted to include sidewalks, bike lanes, and safe crossings.

   In conjunction with revising LOS policies, we ask that the City of Rancho Cordova develop and adopt a multi-modal LOS policy that includes bicycles, transit, and pedestrians. To adopt such a policy would place Rancho Cordova at the forefront of progressive transportation policy.

3. Goal C.2: *Establish an extensive, world-class pedestrian and bicycle network that is a safe and attractive option for local or regional trips or*

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Letter 12 Continued

recreation and that connects to the City's neighborhoods, parks and schools, employment areas, and retail centers.

Safe, convenient pedestrian crossings are critical on multi-lane roadways. We strongly recommend adding a policy to provide safe pedestrian crossings within reasonable walking distance along all of Rancho Cordova's roadways, and a corresponding action to prepare and adopt crossing standards that address curb ramps, crosswalks, pedestrian refuge islands, signalization and timing, and mid-block crossings. This is a major issue and deserves a separate section in the Safety Element, similar to the section on Traffic and Pedestrian Accidents at At-Grade Railroad Crossings.

We also recommend adding a policy under Goal C.2 that states "The City will work toward complete streets that serve all users by improving conditions of walking and bicycling whenever a roadway project is completed." If the pedestrian and bicycle network are to become "world-class," then improvements need to made through ongoing routine accommodation, with support from occasional grants.

4. Policy C.2.4: *Provide sidewalks throughout the City. Minimum widths for sidewalks are shown below, but these may be adjusted…Meandering sidewalks are discouraged…* 12-1 cont.

   For the residential/industrial street classification, WALKSacramento supports 5 foot sidewalk width only if separated from the roadway by a landscaped buffer. If the sidewalk is attached, we strongly recommend a 6 foot width minimum. We prefer separated sidewalks and vertical curbs to help create a safe, enjoyable walking environment. We support the statement discouraging meandering sidewalks.

5. Policy C.2.8: *Promote bicycling and walking as a safe and attractive activity. Educate all road users to share the road and interact safely.*

   We recommend adding an action declaring that the City find a way to fund at least one crossing guard at each elementary school in Rancho Cordova. Crossing guards have been the number one improvement desired by parents of school-aged children at all of the elementary schools we have worked at in the Sacramento region. Unfortunately, they are hard to fund because there are no laws or provisions for funding them in our region. A program that finds a way to provide crossing guards would be a great asset to the City's safety goals, would help build the image of the City's schools, and create an environment where its youngest members lead healthy lives.

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Letter 12 Continued

Thank you for your consideration of these comments and recommendations. If you have questions or need additional information, please contact Scott Clark or me at (916) 446-9255 or via email at sclark@walksacramento.org or ageraghty@walksacramento.org. 12-1 cont.

Sincerely,

Anne Geraghty
Executive Director

CC: Rich Bell, Active Living by Design
Tracy Canfield, Sacramento Regional Transit
Teri Duarte, Sacramento County Department of Health
Rachel DuBose, Sacramento Metro Air Quality Management District
Rebecca Garrison, 50 Corridor TMA
Bruce Griesenbeck, SACOG
Walt Seifert, Sacramento Area Bicycle Advocates (SABA)
Sharon Sprowls, Odyssey
Paul Zykofsky, Local Government Commission

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Letter 12 Anne Geraghty, WALKSacramento

Response 12-1: The commenter is referred to responses to Comment Letter 7.

Letter 13

APRIL 13, 2006 PLANNING COMMISSION MEETING TRANSCRIPT

Commissioner Vance: All opposed? [Silence] Carried then. 3A then.....Everybody turn to Item 3B, which is the General Plan Draft EIR.

Pat Angell: Good evening again, Planning Commissioners. This is Pat Angell again from the Planning Department. I am the General Plan EIR project manager. And tonight similar to the Redevelopment Plan, we're going to be talking about the Draft EIR for the General Plan and providing some information and background.

The purpose of tonight's meeting is basically to provide an overview of content of the Draft General Plan EIR as well as basically provide opportunity for the public and then the agencies tonight to provide input on the adequacy of the analysis contained in the draft EIR. Apparently our public review period, which I will explain a little later, is now going to end May 15th; it was originally going to end at the beginning of May. No action or consideration will be, uh, considered tonight on the General Plan or the EIR. Tonight again is information and to provide an opportunity for the public to input, provide input on whether or not we've the analysis correctly and we should be considering other things, etc.

So I'm going to spend a very brief amount of time talking about the General Plan. If I did talk about the General Plan in great length, we would be here all night. The short of it is is the General Plan is a comprehensive, long-range plan for the physical development of the City and its planning area, which I have a map and I will describe the differentiation between the City and planning area based on the City's vision. It is important to note, this is the City's first General Plan since incorporation. When we initially incorporated, we had to adopt the County's General Plan; this is our first, own original General Plan.

At buildout, the General Plan will accommodate approximately 310,000 people, population, as well as 195, 000 jobs. This plan, as you are aware, is generally consistent with SACOG's blueprint.

This is the map and I'm going to spend just a brief amount of time orienting those in the audience to the map because it's a very large map and it's very hard to see even when you've got it in front of you. This red line here which snakes up through this area out to the American River is the City limits. So this is, when we're talking about the City boundaries, this is our current City boundaries. This is Grantline Road, this is Sunrise Boulevard, this is the River. Up Highway 50. That's Mather Field. The planning area is this blue line that accounts for approximately 58,000 acres. About to the River, includes Gold River community, comes all the way out to Watt Avenue. So this is the planning area and this is the City limits. The General Plan EIR looks at the environmental effects of development of the City as well as the planning area as described in the General Plan itself.

Letter 13 Continued

APRIL 13, 2006 PLANNING COMMISSION MEETING TRANSCRIPT

Now, I know this is the second EIR to come before the Planning Commission, but I thought given the size of this EIR and the significance of the General Plan, I'd spend a little bit of time talking about really why do we do CEQA in the first place? Uh, as you are aware staff has spent a great amount of time developing the General Plan with several public workshops, time with council, work with the GPAC, etc. Once the public document was released we had to comply with CEQA, prepare the draft EIR. The purposes of the CEQA process, the California Environmental Quality Act, and EIR is basically to provide disclosure of the environmental effects to the public and decision makers to consider the environmental effects of it, damage could be caused, identifying the mitigation measures or alternatives that could be considered, provide disclosure, provide an opportunity for the City and other agencies that have interests to interact and try to work out some of those issues, also provide an opportunity for the public to come out and provide input in the process. Often times there are experts out in the general public who can provide meaningful input into the process. This is just a brief slide on what CEQA does and CEQA doesn't do for those who aren't familiar with the acronym. It considers environmental effects, provides opportunity for public disclosure, allows for the public and agencies to have input into the environmental review process. An EIR is not considered to be an advocacy piece or an opposition piece to a project; it simply is a disclosure document. It doesn't require that you have to deny the General Plan because of significant environmental effects. The City can, upon final approval, make findings on why they consider certain environmental effects acceptable given economic or health reasons they would feel override those issues. It doesn't address economic or social concerns except in the cases when economic and social concerns can be related to a physical effect to the environment.

An important note, the General Plan EIR has some really unique aspects of the environment to highlight. It's the first comprehensive review of direct and cumulative effects from both the City and the planning area that's been done in quite some time. The last look at this area by an EIR comprehensively, is the Sacramento County General Plan EIR, which was done back in 1993. So this provides some new data, some new City information, that can be very use for the City perhaps when it's considering other projects or wants to initiate other planning activities. This information also provides a base for impact analysis for any subsequent projects the City considers that's consistent with the General Plan.

That's a brief history of where we've been. The Notice of Preparation letting the public and agencies know that a draft EIR was going to be prepared and soliciting comments was released back in February of last year. We held a public scoping meeting to receive comments on what should be looked at in the draft EIR back in March of last year. On March 13th of this year, we released

Letter 13 Continued

the draft EIR. As also noted, we had some minor glitches with the hard document and the CD files as well as the website files of the EIR that had to be corrected. We did some additional noticing, sent out some additional copies, extended comment periods. And those notices were sent out both on March 20th and 27th. At a workshop by the City Council on March 28th, the City Council recommended that the public comment period be extended to May 15th to provide for extra time for those to review considering the length of the document and the issues involved. That was the result of a written request for a time extension.

This is a highlighted list of the environmental issues areas the draft EIR looks at. For those that can't read it, this list consists of:

- Land Use
- Agriculture
- Population, Housing and Employment
- Hazards
- Transportation
- Air Quality
- Noise
- Geology and Soils
- Hyrology
- Biological Resources
- Cultural and Paleo Resources
- Public Services and Utilities
- Visual Resources
- Growth Inducement

These are issues areas that there were identified at least one or more significant, unavoidable impacts. And what that means is, the EIR identifies it to be a significant effect to the environment in this topic area. Mitigation measures were applied and after that it was concluded that even with the application of mitigation measures there was no way to implement the General Plan and avoid the environmental effects identified. These areas included land use; agriculture; population, housing and employment; transportation; air quality; noise; geology and soils; hydrology; biological resources; cultural resources; public services and utilities; and visual resources.

Now just to note, since EIRs often come off as being very negative, we wanted to highlight that actually the EIR provides information on some benefits about the General Plan at buildout as compared to buildout under current land use patterns identified in the SACOG blueprint process. One to note is that the vehicle miles traveled outside the City of Rancho Cordova, if we implement the General Plan, will get reduced as compared to current development patterns under current conditions identified in SACOG blueprint. Uh, this includes the assumption that the City does smart growth and the rest of the region doesn't follow SACOG's blueprint. It looks a lot better if the entire region goes

Letter 13 Continued

APRIL 13, 2006 PLANNING COMMISSION MEETING TRANSCRIPT

SACOG blueprint. The second item that has been identified is this has reduction impacts in what has commonly referred to as "growth displacement." SACOG has identified we're going to have a lot of folks who want to move to the area come 2050. This General Plan provides for a lot more opportunities to accommodate that growth in the region. Without this sort of development pattern, then this growth pressure gets displaced somewhere that has environmental effects.

There are four alternatives considered in the General Plan EIR; I'll briefly run through them. One was the maintenance of the Sacramento County General Plan land use designations and policy documents for the City. The second one identified as the existing City boundary alternative was implementation of General Plan just within the City's corporate boundaries as well as its identified sphere of influence. The third one is a modification of the land use diagrams and the conceptual diagrams for the planning areas outside the City to minimize effects to natural resources. Primarily vernal pools and wetlands was the focus. The last one may, when you read it, look a little odd, the SACOG blueprint scenario, given that our General Plan was based on SACOG's blueprint. The difference between this alternative and the proposed General Plan is this one's based literally based on the land map SACOG generated as part of the SACOG process, which our map differs slightly.

The next step in the environmental review process is to receive comments tonight on the adequacy draft EIR. There will also be ample time after this to receive written comments on the Draft EIR. The comment period again has been extended to May 15th. Comments can be provided in writing to City Hall. They can also be e-mailed through the City's website. CEQA requires that we have to respond to every comment provided in writing. Those responses to comments with any minor corrections we need to do to the draft EIR will constitute the final EIR. There will be additional meetings on the final EIR and consideration of the General Plan as we move forward in the process. And at some point City, the Planning Commission will be asked to make recommendations to the City Council both on the General Plan and the EIR.

So again, tonight, what we ask is if you'll open up the podium for people to provide comments on the adequacy of the draft EIR and then close the public meeting. Again there is no action to be considered tonight on the General Plan and the draft EIR. Certainly if you have any questions about the environmental review process and where we are going from here, we'd be happy to answer them. And I thank you for your time.

Commissioner Smith[?]: Are there any questions about this?

Commissioner Konarski: I have a couple of questions. Um, a real broad question and then a real simple question. On the first broad question, when you talk about alternatives 1 thru 4, compared to the alternatives ...draft 13-1

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	EIR. I'd like to know perspective of…does other cities look at these alternatives and let's say for example does the Commission look at Alternative 2 and decide that that's the way that they decide the City would like to go, we can go towards Alternative 2 and go that way. Or is it just, is it just ideas to compare what we are doing as a city?	
Pat Angell:	The information provided in the EIR gives you the opportunity to consider another alternative. These four alternatives are evaluated rather extensively in this EIR and if the Commission and eventually the City Council decide to go a different direction, go with an alternative similar to one of these four, there is enough information in the EIR to allow them to do that without having to restart the environmental review process. Does that answer your question?	13-1 cont.
Commissioner Konarski:	Yes, it does. Thank you.	
	And then on the draft document that you gave us, on the report that we got in our packets, page one thru five, that report, on page two you have a table here that stated "the residential units, on the residential units for buildout at 75,923 at full buildout" Okay. See that top right?	
Pat Angell:	Yes.	
Commissioner Konarski:	I have a question, on year 2030 why is that number larger than the full buildout?	
Pat Angell:	This information is based on the Places© model that was utilized by the City to project buildout. It does something funny with the numbers when you go to the buildout scenario, um. The adjustment is not significant enough that it renders the environmental analysis incorrect. It just, it seems to be a weird glitch. I spent a lot of time speaking with Christopher Jordan and Pam Johns about this. Uh, but, it's just kind of a weird modeling function how Places© works, when you start segregating out certain geographic areas on the way the model works it starts kind of recalculating things.	13-2
Commissioner Konarski:	Okay. So buildout is what the City should be on a maximum level of buildout, there is no more building that we can put in there, but that is just a small glitch in the software you are using.	
Pat Angell:	Correct. The number variation is not significant enough that we would have a, an environmental issue triggered.	
Commissioner Konarski:	Okay. I know this is a small number, I was just curious...beyond that…. Thank you.	
Commissioner Vance:	Commissioner Smith?	
Commissioner Smith:	Patrick, I have a question just for clarification on Alternative 4 on the SACOG comparison with SACOG blueprint. Having worked with the General Plan working group, I know there was a lot of emphasis for trying to conform as closely as possible to the SACOG blueprint because we believe it's so important for the region. Uh, but, and you may have stated this, but restate it for me or clarify it	13-3

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for me, that if we, our General Plan differs from the blueprint, it's that we are more stringent or we go that extra mile as opposed to doing some less than the blueprint. Can you give some clarity on that?

[Muffled voices.]

Pat Angell: Certainly, when we compare numbers between the blueprint and, I can grab my EIR and actually cite the numbers to you if you are so interested, between the blueprint and the proposed project, they really don't vary all that significantly. What varies and has some environmental relevance is the land plan. There are some areas of the SACOG blueprint map shows as open space or of lesser density that our map doesn't, our conceptual plans don't. That's really where there's some variation. But the concept of smart growth, jobs-housing balance, they're basically the same. The impact associated with traffic matters are basically the same. There is no difference. It's really more land based than anything else when you compare the two maps. 13-3 cont.

Commissioner Moe: I have a question; I'm trying to recall the blueprint process. Wasn't there three alternates that were looked at for the area? And one was not very dense, one was more dense, and one was very dense?

Pat Angell: They've done a whole series of scenarios and one was, you know, keep with the current status quo and there was some variations on that. And what they ended up with was what they call "Modified Scenario C."

Commissioner Moe: Yeah. Modified Scenario C. And that's what the City of Sacramento is doing, I believe. Is that correct?

Pat Angell: Um, I'm not quite familiar with where their General Plan stands right now. But I've heard that they are going in that direction. But I don't have any information currently on that. 13-4

Commissioner Moe: Well I was at a meeting on Tuesday, and I believe that was what I got out of it from the planning director. So is what we're doing too basically, is we are kind of going down that same path of Modified C?

Pat Angell: Well, I can't speak to the great details of, you know, the evolution of the General Plan. Pam Johns is the best resource. But, it's been my understanding from staff reports and working with Pam that what we've developed here with our General Plan is our own local perspective of what SACOG blueprint was trying to get at, what worked best for our area. The SACOG blueprint was obviously looking at a much larger geographic area and we're looking more focused on our own city.

Commissioner Konarski: One more quick question. On the different alternatives, are you going to make a comparison between the five, or four, alternatives plus the General Plan, are you going to do a summary document about comparing the advantages and disadvantages of each plan? 13-5

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Pat Angell: Uh, at some point, when we get to the final EIR and the project moves forward for action, the City is required to do an analysis or set of findings regarding alternatives and why we would not consider some alternatives over others. And that's when, you know, other items that come into play beyond the environmental analysis factor and why you'd maybe not consider a certain alternative reasonable. Well, actually technically, the term under CEQA is feasible; why you would not determine them feasible and that documentation will happen later in the process. Basically when we hit the month of June based on our current schedule. Um, what the EIR simply provides is a comparison of the environmental effects and a little brief discussion of how it matches up with the City's vision. 13-5 cont.

Commissioner Vance: Okay then we'll open this up for public comment and I have the first one here Daniel Scott. You have three minutes, Daniel.

Daniel Scott: My name's Daniel Scott. I'm with Habitat 20/20 and we represent the habitat conservation interests of numerous local organizations: the Sacramento chapter of the Sierra Club; Ecos; California Native Plant Society; Urban Creeks Council; Sacramento Audobon; Friends of the Swainson's Hawk; and the Save the American River Association. Um, in general the goals that have been laid out in the draft EIR and the General Plan for habitat protection are great. They're laudable goals, but the problem is that the General Plan is lacking specific guidance to make sure that these natural treasures that we have here in Rancho Cordova are actually protected. Because without these specific protections, there's nothing that is going to guarantee that future councils, future planning, future Planning Commission, is going to come in here and trump all of the hard work that has been done here in order to protect these areas. 13-6

Um, I'll briefly go over four specific areas that need to be addressed. First of all, the natural resources policies fail to provide clear and enforceable protections for specially protected species and habitats. For example, there is a goal to conserve Swainson's hawk habitat, yet there is no specificity in what an adequate amount of preservation would be or how this would go about. Um, again with establishing large wildlife corridors, there's no definition of what is considered large or what is considered an adequate wildlife corridor. Um, second, there are 37 species of plants and animals that are listed in the General Plan as protected. Yet there's only one that is specifically mentioned as having any goals of protecting, which is Swainson's hawk. Uh, we're lacking 36 other species that do not have protection. 13-7 Uh, third, if we look at the open space parks and trails element, this element is incomplete. Uh, under the planning zoning law, the open space element is required to have definite plans to make positive action. It can't just be a general, vague idea that there needs to be open space protection. There needs to be very specific progressive plans here that are made. 13-8 And the fourth is that the mitigation measures in the draft EIR are not enforceable because they lack measurable performance standards. Once again, this area's just too vague. It 13-9

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	says that you're going to mitigate by going through mitigation processes with the goal of mitigation. It's very circular; there is nothing really specific going through and saying how these mitigation processes are gonna, going to come about. So um, once again just in summary: The goals are great, the intentions are great, a little bit specificity is something that would guarantee that these goals are met and enforced in the future. Thank you.	13-9 cont.
Commissioner Vance:	Thank you, Mr. Scott. Do you have any questions that you wanted to ask him?	
[Muffled conversation.]		
Commissioner Konarski:	Does there need to be performance outcomes for a environmental document like this?	
Pat Angell:	I'm sorry; I muted myself. Um, well for starters the intent of tonight is really to receive comments from people. We don't really want to enter dialogue at this date. I will make the general statement that CEQA does require the provision of performance standards from mitigation. You have to be clear on exactly how you're gonna mitigate. There needs to be clear provision of standards.	13-10
Commissioner Konarski:	Okay. Thank you.	
Commissioner Smith:	I have just one commentive question based on that regard without turning into detailed discussion. It is my understanding that the one point that he made about the circular thing regarding mitigation. It is by definition a General Plan and it's my understanding that the specific mitigations that I think he's looking for would be done pretty much on a project-by-project basis. That's where we're actually going to see the mitigation measures to meet those using the guidelines of our General Plan. Is that correct? Or is there precedent toward having General Plans with much more specific guidelines for mitigation?	
Pat Angell:	I have certainly seen general plans and general plan EIRs get into a lot of detail. Um, El Dorado County is maybe one example of such a place where there's a lot of detail. Um, but you are correct that this is a General Plan covering a lot variations and the implementation, you know, out 20 years and that in turn the environmental analysis is programmatic. But still the requirement performance standards still need to be applied. While you may not specifically state, uh, you know, our mitigation is that we're gonna create wetlands on this specific piece of property. Typically we do not do that in a general plan EIR, except for performance standards that may include such a possibility but you don't specify, you typically don't specify that.	13-11
Commissioner Savom:	If what our speaker said is true that we have some holes in the EIR, draft EIR, there is an old agage about problems I have, bring me solutions. Would it be possible for staff to get the gentleman's name, phone number and contact, um, items, and have him perhaps draft some recommendations for the four areas of concern that he has. That might mitigate some the extra work that you all may have to do and perhaps between staff that we have	13-12

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and the decreased staff and our speaker and his coalition of supporters, um, maybe this process could be accelerated to where the end result would be a happy medium where both sides would be, um, uh, happy with the result and so that somewhere down the road we're not knocking heads over this thing again.

Pat Angell: Absolutely, that's the whole purpose of having a public review process for the draft EIR is that people in the public can offer and, you know, agencies and interest groups can provide input on better ways to write mitigation or improvement so they can see, I mean that's, that's part of this process. And staff would certainly be very willing to sit down with anyone who has such issues and try to work them out. **13-12 cont.**

Commissioner Savorn: Okay, that being said then I would ask the speaker to get his, uh, his, uh, coalition of supporters together, contact our staff and go work toward a solution that you'll be happy with and that they will be happy with. Because I don't want to hear you come up here three months from now and rag on something that's been worked at and worked at and worked at because you had not had your input. So if you would do that, I for one would appreciate and I'm sure the rest of my Commissioners plus our staff would appreciate it.

Commissioner Vance: The next speaker that we have is Wagner, Kelly Wagner. What's your first name, Mr. Wagner?

Keith Wagner: Keith. It's Keith Wagner. I am here from the law office of J. William Yates. I represent, I'm an attorney, I represent Habitat 20/20. Um, we've had an opportunity to look at, begin to look at, this draft EIR and General Plan. There are some significant concerns with regard to natural resources. Um, the purpose of CEQA is partially to disclose what impacts are. And this EIR certainly does that in spades. But, there's another purpose behind CEQA, which is to identify alternatives and indicate the manner in which it's significant effects can be mitigated or avoided. **13-13**

With regard to the natural resources especially in the planning area to the east and south, um, the natural resources in those areas are effectively written off in this EIR, as a casualty of paving over the planning area to serve an expanding population of 300,000 people. The EIR recognizes eight different areas of impacts. And out of those eight different areas, seven of them are significant and unavoidable impacts. And the only one that's left is whether this project is consistent with an HCP. And the only reason it finds that it's not a significant and unavoidable impact, is because, luckly, the HCP hasn't been adopted yet. **13-14**

The, um, natural resources element that we have in front of us, as Mr. Scott mentioned, is, it addresses a lot of very important issues, and I don't want to give anybody here the impression that we don't think that the City is giving a good go at what some of the issues are that are before them. But one of the fundamental purposes of the General Plan is to serve as a constitution for future development to literally guide any future land decision that is **13-15**

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made. This natural resources element that you have in front of you now address a lot of important environmental issues, but it does so with words like "the City shall encourage" certain activities, "the City shall promote" certain activities, "the City shall mitigate" certain effects "to the extent feasible." All of those words, everything that I just ran by you is what makes this document unenforceable. You may do all of your work here; your City Council may adopt this plan, only to find that future City Councils say "Well, we've promoted that. We encouraged it. We did what we could." But those resources are going to be gone. Thirty-seven species, 37 special status species in the land use planning area. And that's not even, when you look at the tables, don't be mislead as well, see NDD—Native Diversity Database. That's a positive citing database, that only means what's been found out there. If they haven't gone looking for it yet, it's not showing up on the list. 13-15 cont.

One of the most significant species on that list is the Sacramento Orcutt Grass has a totalof eight populations in the state, and all but one are in that planning area. And this document does nothing to specifically address how it's gonna conserve those species. 13-16

Mr. Scott mentioned that the open spaces portion of the General Plan doesn't have an action plan. And I would point out that at Government Code Section 6566 "any action by the county for open space has to be consistent with the local open space plan." And at 65564 the Government Code says that "every local open space," which essentially is the open space element if you look at how this is defined, "must contain an action program consisting of specific programs which legislative body intends to pursue to implement the open space plan." Your open space is a total of 12 pages long, and only seven of those pages are your policies. And the most significant policy with regard to this discussion is policy number OSPT2.2, which adopts the policy that says "the City will create a plan for identifying and maintaining open space." This policy essentially says we don't have what the government code requires us to have. We don't have an actual plan of how we're gonna deal with open space. Now, why is that important? Because, and this is what the legislature said when it enacted these policies, it said that the legislature found that "the anticipated increase in population of this state demands that cities, counties, and the state at the earliest possible date make definite plans for the preservation of valuable open space land and take positive action to carry out such plans." In other words, as you adopt a general plan, this policy or this law says we've got to have a real plan in place because otherwise what is going to happen is we are going to expand the City from 50,000 people to 300,000 people and look back on the process and say, "Look at those opportunities we lost." 13-17

So one of the questions that was brought up here, and I think it's a really relevant one, is, uh, project by project mitigation. This is a General Plan. This is a General Plan. We should be able to look at 13-18

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these things and say, why don't we just give this, you know we're going to say we can do the most we can now and then as these projects come up we can look at the individual effects. Last year CEQA was criticized by the Governor's office, and specifically with regard to housing, because it was supposed that CEQA was blocking the development of new housing and new places for people to live. An advisory group was convened across the state and in multiple regions and what those advisory groups came to, and those advisory groups included not just environmental interests but also local planners, local developers, and included a wide range of stakeholders. And they all sat down around the table, the developers and the planners agreed with the environmentalists. And they all said CEQA isn't the problem here. What the problem is here is we have vague and unenforceable general plans and inadequate environmental review at that level. And so what happens is all of the environmental review devolves onto individual projects, individual mitigation, piecemealing of mitigation, winding up with mitigation preserves that are unconnected at various odds with each other. 13-18 cont.

So, can you do a General Plan that doesn't mitigate everything? Obviously, I mean there are always going to be questions because it is a General Plan. But if there is any guidance to be given it's that as much as you can frontload in this process, you do yourselves a favor, you do the environment a favor, and you actually do the people who want to get the projects done a favor because they can rely on those documents to get them done.

Finally I would note, and I thank you very much for allowing me the extended time. I know I'm over my three minutes.

Commissioner Vance: You're quite a bit over that time.

Keith Wagner: Is that with regard to these endangered species the conclusion is that there is no feasible mitigation. And I would point that, my final point, the staff and the Planning Commission to CEQA Guideline 15065, that is a mandatory findings of significance. It was recently amended last year, and what it says is that if an HCP is adopted and that HCP is adopted using an EIR, and it meets certain criteria and they are listed under Section 15065, any project that falls under that HCP or within its ambit is considered mitigated. One key policy that, that you can require or have staff look into is a requirement in this General Plan that no development that would affect that list of 37 species, no development that would affect that list, can be allowed to go forward until this City has an HCP. Because at that point, first of all it's mitigated because it can't go forward until there's an HCP, and second of all, after there's an HCP, this guideline says, it's mitigated. Thank you. 13-19

Commissioner Vance: Thank you, Mr. Wagner. Staff, I'd.... Was there anybody else from the public that wanted to make a comment on that? Then we'll close the public hearing and as for, there's no action that the Planning Commission is to take tonight. We will close on this particular itemas there is no vote on this that is needed and we

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shall continue on. Uh, with item 4C, which is the Metro Fire Station number 68, RC-05-202, Conditional Use Permit and Design Review.

Commissioner Savorn: Mr. Chairman, before Mr. Wagner leaves and his constituents, so to speak. Mr. Wagner, I appreciate your educational points of view that you shared with us and once again I'd ask that you'd offer your services to our staff to see if we can't mitigate some of this. I really appreciate the heads up that you've shared with us and I think you're going over the sand dial there was well worth it. And I appreciate the way you presented yourself and came across very much so as an educator as opposed to someone grinding some axes, so I want to thank you. 13-20

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Response 13-1: The commenter asks whether alternatives considered in the Draft EIR can be further considered as another option to adopting the proposed General Plan. The analysis provided in the Draft EIR (see Draft EIR Section 6.0 – Project Alternatives) provides substantial that would allow the City to further consider the adoption of alternative rather than the proposed General Plan.

Response 13-2: The commenter asks for clarification of the anticipated buildout projections for the City identified in the Draft EIR for year 2030 and buildout conditions (see Draft EIR Table 3.0-1). As noted in the response, there is a minor variation in the number of residential units within the existing City boundaries between year 2030 and buildout (24 residential units). This variation is a result of the City of Rancho Cordova PLACE3S Land Use Model reallocating development intensities throughout the Planning Area of the City of Rancho Cordova General Plan. The Draft EIR impact analyses are based on both year 2030 conditions and buildout conditions.

Response 13-3: The commenter asks for clarification regarding the difference between the proposed General Plan and Alternative 4 (Sacramento Area Council of Governments [SACOG] Preferred Blueprint Scenario). As identified on Draft EIR page 6.0-67 and 6.0-69, Alternative 4 is similar to the proposed General Plan but does differ in regards to the land use pattern and intensity of development (this alternative would result in 16,856 more dwelling units and 40,892 more jobs than the proposed General Plan). A comparison of Alternative 4 to the proposed General Plan is provided in Draft EIR Table 6.0-1.

Response 13-4: The commenter asks for clarification regarding the SACOG Blueprint process. The SACOG Blueprint is described in detail in Draft EIR Section 4.1 (Land Use) and was the basis of the development of the proposed General Plan.

Response 13-5: The commenter asks for whether a comparison of the alternatives in the Draft EIR would be provided. Draft EIR Table 6.0-1 provides a comparison of the environmental effects of the Draft EIR alternatives with the proposed General Plan. As part of action regarding the adoption of the proposed General Plan, the City will be required to make certain findings under State CEQA Guidelines Section 15091 regarding the alternatives.

Response 13-6: The commenter is referred to Response to Comment 8-3.

Response 13-7: The commenter is referred to Response to Comment 8-3, 8-4 and 8-5.

Response 13-8: The commenter is referred to Response to Comment 8-7.

Response 13-9: The commenter is referred to Response to Comment 8-3, 8-4, 8-5, 8-11 and 8-12.

Response 13-10: The commenter is referred to Response to Comment 8-3, 8-4, 8-5, 8-11 and 8-12.

Response 13-11: As noted in Draft EIR Section 1.0 (Introduction), the Draft EIR has been prepared as a "Program EIR" pursuant to State CEQA Guidelines Section 15168 (Draft EIR page 1.0-2). As specifically on Draft EIR page 3.0-55:

> *This EIR provides a programmatic environmental review of implementation of the General Plan. Subsequent activities under the General Plan would utilize this EIR as the basis in determining whether the later activity may have any significant effects, to focus the environmental review of the subsequent activity, and the conclusions of this EIR can be incorporated where factors apply to the program as a whole.*

The commenter is referred to Response to Comment 8-3, 8-4, 8-5, 8-11 and 8-12 regarding performance standard mitigation.

Response 13-12: City staff met with representatives from Habitat 2020 on April 24, 2006 to discuss concerns regarding the proposed General Plan and Draft EIR. This Final EIR responds to written comments regarding the adequacy of the Draft EIR. City staff considers the Draft EIR adequate and consistent with the requirements of CEQA.

Response 13-13: The Draft EIR adequately addresses the physical environmental effects of implementation of the proposed General Plan and provides an analysis of alternatives consistent with the requirements of CEQA.

Response 13-14: Draft EIR Section 4.9 (Biological Resources) addresses the biological resource impacts of the implementation of the proposed General Plan and includes the identification of several mitigation measures to reduce these impacts (Draft EIR pages 4.10-32 through –68). However, the Draft EIR identifies that even with implementation of these mitigation measures and proposed General Plan provisions, impacts to natural resources of concern would remain significant and unavoidable given the proposed alteration of habitat conditions of the entire Planning Area for the City of Rancho Cordova General Plan.

Response 13-15: The commenter is referred to Response to Comment 8-3, 8-4, 8-5, 8-11 and 8-12 regarding performance standard mitigation and Response to Comment 13-14 regarding the extent of anticipated biological resource impacts.

Response 13-16: The commenter is referred to Response to Comment C-2, C-7 and 8-11. Impacts to Sacramento orcutt grass is specifically addressed under Draft EIR Impact 4.10.1 (Draft EIR pages 4.10-34 through –43).

Response 13-17: The commenter is referred to Response to Comment 8-7.

Response 13-18: The commenter is referred to Response to Comment 8-3, 8-4, 8-5, 8-11 and 8-12 regarding performance standard mitigation.

Response 13-19: The commenter is referred to Response to Comment 8-12.

Response 13-20: The commenter is referred to Response to Comment 13-12.

4.0 – Minor Revisions to the Draft EIR

4.1 INTRODUCTION

This section includes minor edits to the Draft EIR. These modifications resulted in response to comments received during the Draft EIR public review period as well as staff-initiated changes.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, nor do they alter the conclusions of the environmental analysis. Changes are provided in revision marks (underline for new text and ~~strike out~~ for deleted text).

4.2 MINOR CHANGES AND EDITS TO THE DRAFT EIR

1.0 INTRODUCTION

No changes to the Introduction were necessary.

2.0 EXECUTIVE SUMMARY

Revisions to the Executive Summary appear in Section 2.0, Executive Summary, of this Final EIR in **Table 2.0-1**. These revisions include edits to mitigation measures as well as the addition of mitigation measures. The following is a list of mitigation measures modified and why they were modified:

Mitigation Measure MM 4.7.4: This mitigation measure was modified by the City staff in order to clarify the intent of the mitigation measure.

Mitigation Measure MM 4.9.4: This mitigation measure was deleted as a result of text changes to General Plan Action Items ISF.2.4.1 and 2.4.2 that incorporate the provisions of Mitigation Measure MM 4.9.4 (see below):

Action ISF.2.4.1 The following shall be required for all legislative-level development projects, including community plans, general plan amendments, specific plans, rezonings, and other plan-level discretionary entitlements, but excluding tentative subdivisions maps, parcel maps, use permits, and other project-specific discretionary land-use entitlements or approvals:

- ~~An assured water supply and delivery system shall be available at the time of project approval.~~ Proposed water supplies and delivery systems shall be identified at the time of development project approval to the satisfaction of the City. The water agency or company proposing to provide~~ing~~ service (collectively referred to as "water provider") to the project may provide several alternative methods of supply and/or delivery, provided that each is capable individually of providing water to the project. ~~This assurance of water supply shall identify that the water agency has legal entitlement to the water source and that the water source has long term reliability (at least 20 years) under normal, dry and multiple dry years.~~ The project

applicant or water provider shall make a factual showing prior to project approval that the water provider or providers proposing to serve the development project has or have legal entitlements to the identified water supplies or that such entitlements are reasonably foreseeable by the time of subsequent, project-specific discretionary land-use entitlements or approvals. This factual showing shall also demonstrate that the water provider's identified water supply is reasonably reliable over the long term (at least 20 years) under normal, single-dry and multiple-dry years.

- All required water treatment and delivery infrastructure for the project shall be in place at the time of subsequent, project-specific discretionary land-use entitlements or approvals ~~project approval~~, or shall be assured prior to occupancy through the use of bonds or other sureties to the City's satisfaction. Water infrastructure may be phased to coincide with the phased development of large-scale projects.

Action ISF.2.4.2 - The following shall be required for project-specific discretionary land-use entitlements and approvals, including but not limited to, all tentative subdivision maps, parcel maps, or use permits ~~all subdivisions to the extent permitted by state law~~:

- ~~Proposed water supply and delivery systems shall be identified at the time of tentative map approval to the satisfaction of the City~~. An assured water supply and delivery system shall be available or reasonably foreseeable at the time of project approval. The water agency (or agencies) providing service to the project may provide several alternative methods of supply and/or delivery, provided that each is capable individually of providing water to the project.

- The project applicant, water agency (or agencies), or water company (or companies) providing water service to the ~~subdivision~~ project site shall ~~demonstrate prior to the approval of the Final Map by the City that sufficient capacity shall be available to accommodate the subdivision plus existing development, and other approved projects in the same service area, and other projects which have received commitments for water service~~ make a factual showing consistent with, or the City shall impose conditions similar to, those required by Government Code section 66473.7 in order to ensure an adequate water supply for development authorized by the project. Prior to recordation of any final subdivision map, or prior to City approval of any similar project-specific discretionary land use approval or

entitlement required for nonresidential uses, the project applicant or water provider shall demonstrate the availability of a long-term, reliable water supply for the amount of development that would be authorized by the final subdivision map or project-specific discretionary non-residential approval or entitlement. This assurance of water supply shall identify that the water ~~agency~~ provider has legal entitlement to the water source and that the water source ~~has long term reliability~~ is reasonably reliable (at least 20 years) under normal, dry and multiple dry years. Such demonstration shall consist of a written certification from the water provider that either existing sources are available or that needed improvements will be in place prior to occupancy.

- Offsite and onsite water infrastructure sufficient to provide adequate water to the subdivision shall be in place prior to ~~the approval of the Final Map~~ the issuance of building permits or their financing shall be assured to the satisfaction of the City prior to the approval of the Final Map, consistent with the requirements of the Subdivision Map Act, or prior to the issuance of a similar, project-level entitlement for non-residential land uses.

- Offsite and onsite water distribution systems required to serve the subdivision shall be in place and contain water at sufficient quantity and pressure prior to the issuance of any building permits. Model homes may be exempted from this policy as determined appropriate by the City, and subject to approval by the City.

Mitigation Measure MM 4.10.1b: This mitigation measure was modified in response to comments received in Comment Letter 8 to provide additional performance standards (see Section 3.0 of this document).

Mitigation Measure MM 4.10.1f: This mitigation measure was added in response to comments received in Comment Letter 8 to provide additional performance standards regarding the interconnections of preserved habitat areas (see Section 3.0 of this document).

Mitigation Measure MM 4.10.1g: This mitigation measure was added in response to comments received in Comment Letter 8 to provide additional performance standards regarding Swainson's hawk foraging habitat mitigation (see Section 3.0 of this document).

Mitigation Measure MM 4.11.2: This mitigation measure was modified to match the new General Plan policy and action item numbering for the Cultural and Historic Resources Element.

3.0 PROJECT DESCRIPTION

No changes to the Project Description were necessary.

4.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

There were no changes to this section.

4.1 Land Use

- Page 4.1-56 of the Draft EIR under "Mitigation Measures", the following text change is made:

  "Mitigation Measures

  ~~See above.~~

  While adherence to federal regulations, the Mather Airport Comprehensive Land Use Plan guidelines, Mather Airport Planning Area policies, and implementation of the above General Plan policies, action items and mitigation measures would reduce potential consistency issues with the Mather Airport CLUP, the proposed General Plan would still conflict with key provisions of the Sacramento County General Plan, Mather Airport CLUP (Rio del Oro Planning Area) and Mather Field Specific Plan associated with agricultural preservation, aggregate resource preservation and overall land use pattern and intensity. No mitigation is available to fully mitigate this impact. Thus, this impact is **significant and unavoidable**."

4.2 Agriculture

No changes were made to this section.

4.3 Population/Housing/Employment

No changes were made to this section.

4.4 Hazards and Human Health

- Draft EIR page 4.4-10, second full paragraph, the following text change is made:

  "To structure the study of soil and groundwater within the IRCTS, Aerojet and MDC divided the IRCTS into sub-areas that are identified as Operable Units (OUs). The OU designations define each study area boundary for the purpose of investigating the presence of chemical contaminants. Soil investigations at each of the Operable Units include the collection of soil, soil vapor, and/or sediment samples. The samples are analyzed for: VOCs, metals, hydrazine, NDMA, polychlorinated biphenyls (PCBs), perchlorate, and/or kerosene. ~~For specific information regarding the IRCTS Operable Units, the reader is referred to the Rio del Oro Specific Plan Project Draft Environmental Impact Report/ Draft Environmental Impact Statement, available at the City of Rancho~~

~~Cordova located at 2729 Prospect Park Drive, Rancho Cordova, California 95670.~~ Since the identification of these Operable Units, one report has been submitted recognizing two new problem areas located on the west side of the By-Dry Operable Unit that consist of burn residuals in soil samples, including heavy metals. Remediation plans for these two new areas are planned for the summer of 2006 (pers. comm., Fricke, 2006). "

- Draft EIR page 4.4-29, the following text change is made after "Policy LU.3.5":

  "Adherence to Federal regulations, Comprehensive Land Use Plan, Mather Airport Planning Area provisions, implementation of the General Plan Land Use policies described above and General Plan Policy LU.3.11 ~~Mitigation Measure MM 4.1.3b (see Section 4.1 [Land Use])~~, would reduce safety hazards due to the location of Mather Airport to **less than significant.** "

4.5 Transportation and Circulation

- Draft EIR page 4.5-54, the following text change is made to the paragraph under Impact 4.5.6:

  "The traffic impact analyses provided in **Impact 4.5.1** and **4.5.2** are based on cumulative conditions (year 2030) that take into account anticipated traffic volumes from development in the region. While the proposed General Plan land uses would provide reduced vehicle miles traveled (in terms of the length of trips) outside of the Planning Area (see **Table 4.5-5**) as compared to maintenance of existing land use patterns (assuming development of the land use pattern under the Sacramento County General Plan), the proposed General Plan would still add substantial traffic volumes on local roadways and state highway facilities that would result in significant traffic impacts within the Planning Area as well as in adjoining jurisdictions (e.g., Sacramento County) on regional roadway facilities. Improvements to regional transportation facilities associated with cumulative traffic conditions are intended to be addressed through implementation of SACOG MTP."

4.6 Air Quality

- Draft EIR page 4.6-16, the following changes are made to the paragraph under Impact 4.6.1:

  "In the early 1990's the Sacramento area had the fifth worst ozone air quality in the United States. The Federal CAA set new deadlines for attaining the federal ozone standards. In 1994, the Sacramento Metropolitan Air Quality Management District adopted a plan to attain this standard called the Regional Ozone Attainment Plan (also called the State Implementation Plan, or SIP). Currently, SMAQMD is in the process of updating the Attainment Plan. This update uses SACOG's Sacramento Region Blueprint: Transportation/Land Use Study as a basis for projected growth in the area (per. comm. Borkenhagen). SACOG's Blueprint has projected population of 329,110 ~~332,000~~ persons, 143,091 ~~112,290~~ housing units, and 235,913 ~~144,406~~ jobs for the area by the year 2050 for the General Plan Planning Area. ~~While the area defined as the Rancho Cordova Community by SACOG does not precisely match the General Plan Planning Area, it is within range to approximate the SACOG anticipated growth for the area.~~ The proposed Rancho Cordova General Plan projects a total buildout population of 310,568, 126,241 housing units and 195,021 jobs. Thus, the proposed General Plan would be within the land use projections being used in the update of the Attainment Plan. However, the update is

not complete and the proposed General Plan land uses are not consistent with the 1994 Attainment Plan. ~~The differences in population, housing units and employment between these two growth scenarios is substantial resulting in an exceedance of the data used to formulate the Regional Ozone Attainment Plan and its ozone reduction predictions and mitigations.~~ Conflicts with the Regional Ozone Attainment Plan may result in the non-attainment of air quality standards for the SMAQMD area. This would be in direct disagreement with the California Clean Air Act resulting in the potential loss of transportation funding for the Sacramento area. This is considered a significant impact."

- Draft EIR page 4.6-17, the following changes are made to the paragraph under "Mitigation Measures":

  "The above General Plan policies and action items would assist in the improvement of air quality conditions. However, they do not require the City to reduce future land uses to be consistent with the current 1994 Attainment Plan. As noted above the proposed General Plan would be within the land use projections being used in the update of the Attainment Plan. However, the update is not complete. ~~more inline with the Blueprint projections used in the Attainment Plan update. As such, implementation of this policy would not fully mitigate the conflict between the proposed General Plan buildout projections and those used in the update Attainment Plan.~~ In addition, there are no feasible methods to completely offset air pollutant emission increases from land uses under the proposed General Plan. Thus, this impact is considered **significant and unavoidable."**

- Draft EIR page 4.6-33 and -34, the following changes are made to the first paragraph under Impact 4.6.6:

  "Implementation of the proposed General Plan would result in substantial new development, increased population, and adversely affect regional air quality. Development under the existing General Plan would correspond to SACOG projections of households and employment that were utilized in the current Regional Attainment Plan. However, the update to the Regional Ozone Attainment Plan uses projections from the Sacramento Region Blueprint. The Sacramento Region Blueprint was intended to provide for reduced air quality impacts by compact development that reduces vehicle miles traveled and the General Plan is modeled after the Blueprint. SACOG's Blueprint has projected population of 329,110 persons, 143,091 housing units, and 235,913 jobs for the area by the year 2050 for the General Plan Planning Area. The proposed Rancho Cordova General Plan projects a total buildout population of 310,568, 126,241 housing units and 195,021 jobs. Thus, the proposed General Plan would be within the land use projections being used in the update of the Attainment Plan. However, the update is not complete and the proposed General Plan land uses are not consistent with the 1994 Attainment Plan. ~~The projected number of housing units under the proposed General Plan would be greater than under the Blueprint. Additionally, employment under the proposed General Plan would be substantially higher, with 195,021 jobs projected under the proposed General Plan and 144,406 under the Blueprint. While the additional job growth is technically inconsistent with the assumptions of the Regional Ozone Attainment Plan, this additional employment is consistent with proposed General Plan goals and overall regional strategies for reducing travel by improving the jobs/housing balance. Jobs/housing imbalances promote long distance commuting. In Rancho Cordova, a substantial number of workers commute to the City, as the current jobs/housing ratio is 2.36:1 (2.36 jobs per housing unit). Build-out of the proposed General Plan would result in an overall jobs/housing ratio of 1.54:1 (1.54 jobs per housing unit), thus reducing the ratio of commuters to the City.~~"

- Draft EIR page 4.6-38, the following text changes are made:

  "Implementation of the above proposed General Plan policies and action items and mitigation measures MM 4.6.3a and b ~~4.6.2~~ and MM 4.6.4a and b identified above would assist in reducing the General Plan's contribution to cumulative regional and local air quality impacts; however, this contribution is still considered **cumulatively considerable** and thus a **significant and unavoidable** impact. No feasible mitigation is available to completely mitigate this impact."

4.7 Noise

- Draft EIR page 4.7-32, the following text changes are made to Mitigation Measure MM 4.7.4:

  "MM 4.7.4 The following shall be added as a new Policy under Goal N.1:

  ~~New residential development shall be prohibited within the 60 CNEL Mather Airport Policy Area and~~ ~~n~~New residential development shall only be allowed inside of the 60 CNEL Mather Airport Policy Area if the following conditions are met:

  1) Noise insulation is provided in all new residential dwelling units, which reduces interior noise levels to 45 dB with windows closed in any habitable room.

  2) Prospective buyers are notified through the Public Report prepared by the California Department of Real Estate disclosing the fact that the parcel is located within the Mather Airport Policy Area.

  3) An Aviation Easement is recorded on the property acknowledging that the property is located within the Mather Airport Policy Area. The easement shall grant the right of flight and unobstructed passage of all aircraft into and out of Mather Airport. The Avigation Easement shall be granted to the County of Sacramento, recorded with the Sacramento County Recorder and filed with the County Department of Airports."

4.8 Geology and Soils

No changes were made to this section.

4.9 Hydrology and Water Quality

- Draft EIR page 4.9-20, the first bulleted item is revised as follows:

  "~~Zone 40 Central Water Treatment Plant~~ Vineyard Water Treatment Plant – SCWA plans to construct the 78-acre Vineyard Water Treatment Plant ~~Central Water Treatment Plant~~ (~~C~~VWTP) and associated water supply facilities to provide up to 85 million gallons per day (mgd) of potable water to existing and approved urban development within the SCWA Zone 40 area. The ~~C~~VWTP site is located at the northeast corner of Florin and Knox Roads, west of

the Florin Road/Excelsior Road intersection in Sacramento County. An associated SCWA corporation yard to house facilities and store equipment would be colocated on the site, along with a groundwater treatment facility. The ~~C~~VWTP would have the capacity to treat 85 mgd of raw surface water and 13 mgd of raw groundwater to serve approved land uses in the Zone 40 service area. Initial phases of facility construction are anticipated to be completed by 2010 with full buildout by 2019."

- Draft EIR page 4.9-45, the following changes are made to the second sentence:

  "Beyond buildout of its corporate limits, new development projects would be served by SCWA and other purveyors ~~(no other purveyors are located outside the City's corporate limits)~~ on a first-come, first-served basis."

- Draft EIR pages 4.9-45 and –46, the following text changes are made:

  "As noted in **Table 4.9-7**, adequate water supplies would likely be available to serve buildout of the City within its current corporate limits. Beyond buildout of its corporate limits, new development projects would be served by SCWA (no other purveyors are located outside the City's corporate limits) on a first-come, first-served basis. While total supplies available (i.e., 77,620 afy) are greater than the City's corporate limit demands (i.e., 57,299 afy), indicating that additional growth beyond its corporate limits may be accommodated, the exact amount of water and corresponding land areas that could be served are currently unknown because SCWA would need to consider requests for service in the context of all water demands throughout the Zone 40 service area. The City may be able to pursue additional growth beyond its corporate limits; however, the City would need to coordinate with SCWA and the City of Folsom (service of Aerojet lands within Folsom's service area) to determine the total demands that could be met by existing and projected future water supplies. Future urbanization of the Planning Area would also increase impervious surfaces near areas determined to have groundwater recharge capability (e.g., near the Cosumnes River)."

  If water supplies are not available to meet buildout water demands, the City would either need to stop approving new growth within its jurisdiction, or collaborate with regional water purveyors to investigate potential future water supply options in the context of the regional water supply planning environment. Investigation of future water supply options would likely require involvement from local water purveyors (GSWC, Cal-Am, City of Folsom, and SCWA at a minimum, and other neighboring purveyors as appropriate), the Water Forum successor effort, and environmental groups. Because of the long-term and sometimes contentious nature of future water supply planning, the feasibility of implementing new water supply options beyond those described in the WFA are unknown. The following section provides a brief summary of potential new water supply options the City could pursue (in collaboration with local agencies) to develop supplies to meet its planning area buildout water demands."

- Draft EIR pages 4.9-46, the following text changes are made to the third through fourth paragraphs:

  "Water Transfers and Exchanges With Nearby Purveyors

  The water purveyors in the Planning Area (e.g., SCWA, GSWC, Cal-Am) could enter into agreements with nearby cities and agencies to secure new or surplus water supplies. Cities and agencies who purchase water from SCWA or have jurisdictional boundaries that overlap the Planning Area ~~Zone 40's boundaries~~ would be a likely choice for developing

such an agreement because the ability to develop distribution system interties. The interties would allow the easy transfer and exchange of water supplies between neighboring water purveyors without the need to construct substantial new conveyance infrastructure. The potential feasibility of water purveyors located near Rancho Cordova providing new water supplies to the City are discussed below.

City of Folsom

GSWC has entered into an agreement with the City of Folsom to transfer 5,000 afy to the City of Folsom pursuant to its agreement for replacement water supplies with Aerojet. Within the agreement there is the option for the City of Folsom to transfer the 5,000 afy to the SCWA for its use within its conjunctive use water supply system. However, based in indications from the City of Folsom, the City does not anticipate the transfer of these supplies ~~to SCWA would be likely~~.

Placer County Water Agency

Placer County Water Agency was contacted to determine whether they had any available water supplies that could be exchanged or transferred to water service providers in the Planning Area ~~SCWA~~. Staff at Placer County Water Agency indicated that based on their Integrated Water Resources Plan, which is currently under preparation and was not available for review at the time the Water Supply Evaluation was…"

- Draft EIR page 4.9-47, the following text change is made to the first full paragraph:

  "GSWC currently has an intertie with Sacramento Suburban Water District (SSWD)'s water distribution system. As of the date of the Water Supply Evaluation, no reply has been received from SSWD regarding the potential availability of water transfer or exchange opportunities. The potential may exist for the acquisition of additional supplies to meet City demands; however, the City would need to coordinate with GSWC and SSWD to determine the feasibility of those supplies. If supplies are available, no substantial new infrastructure would need to be constructed because an intertie connection between these two agencies is already available. Additional distribution and treatment facilities may be required to convey the water from GSWC existing distribution to new growth areas to deliver these supplies ~~to SCWA~~ for distribution in the new growth areas. "

- Draft EIR page 4.9-48, the following changes are made to the second paragraph under "Expanded Use of Recycled Water":

  "Through an agreement between SCWA and SRCSD, the SRCSD has successfully implemented a 5 mgd (5,600 afy) demonstration water recycling program. This program provides recycled water for SRCSD on-site uses and for large commercial irrigation customers within ~~Zone~~ the City of Elk Grove ~~40~~ (e.g., commercial, industrial, right-of-way landscaping, schools, and parks). Recycled water is a desirable source of water for outdoor landscape irrigation and other non-potable uses because of its high reliability and its independence of hydrologic conditions in any given year. By increasing the use of recycled water SRCSD may be able to reduce the amount of treated wastewater discharged to the river which may become a more cost effective solution for the SRCSD's 1.1 million ratepayers as wastewater regulations require ever higher treatment standards (and costs) for discharged effluent. SRCSD's boundary covers most of the ~~the Zone 40 region in the~~ Planning Area. It is expected that the SRCSD's boundary will be expanded further to cover the areas in the Planning Area that are currently undeveloped as development plans are approved."

- Draft EIR page 4.9-49, the following changes are made to the first full paragraph:

  "The Demonstration Water Recycling Program on the Sacramento Regional Water Treatment Plant site was designed and constructed to be readily expandable to 10 mgd (11,200 afy) in accordance with SRCSD's Master Reclamation Permit (WDR #97- 146). A planned Water Recycling Facility plant expansion from 5 mgd to 10 mgd could serve new areas of planned and expected growth and public open space and golf course areas within the City of Elk Grove ~~Sacramento~~. SRCSD will work in partnership with SCWA to serve those areas that are within ~~these~~ Zone 40 ~~areas~~. The expanded water recycling facility and new water recycling service areas will be called Phase II of the SRCSD Water Recycling Program. Phase II construction will be timed with the need for the higher capacity and is currently expected to be in service by 2008- 2010."

- Draft EIR pages 4.9-56 and –57, the following text changes are made under "Mitigation Measures":

  "~~The following mitigation measures would involve changes to the following action items:~~

  ~~**MM 4.9.4** Modify the text of Action Item ISF.2.4.1 and ISF.2.4.2 as follows:~~

  ~~*Action ISF.2.4.1 The following shall be required for all development projects, excluding subdivisions:*~~

  - ~~*An assured water supply and delivery system shall be available at the time of project approval. The water agency providing service to the project may provide several alternative methods of supply and/or delivery, provided that each is capable individually of providing water to the project. However, assurance of water supply shall identify that the water agency has legal entitlement to the water source and that the water source has long term reliability (at least 20 years) under normal, dry and multiple dry years.*~~

  - ~~*All required water infrastructure for the project shall be in place at the time of project approval, or shall be assured through the use of bonds or other sureties to the City's satisfaction. Water infrastructure may be phased to coincide with the phased development of large-scale projects.*~~

  ~~*Action ISF.2.4.2 The following shall be required for all subdivisions to the extent permitted by state law:*~~

  - ~~*Proposed water supply and delivery systems shall be identified at the time of tentative map approval to the satisfaction of the City. The water agency providing service to the project may provide several alternative methods of supply and/or delivery, provided that each is capable individually of providing water to the project.*~~

  - ~~*The agency providing water service to the subdivision shall demonstrate prior to the approval of the Final Map by the City that sufficient capacity shall be available to accommodate the subdivision plus existing development, and other approved projects in the same service area, and other projects which have received commitments for water service. This assurance of water supply shall identify that the water agency has legal*~~

~~*entitlement to the water source and that the water source has long term reliability (at least 20 years) under normal, dry and multiple dry years.*~~

- ~~*Offsite and onsite water infrastructure sufficient to provide adequate water to the subdivision shall be in place prior to the approval of the Final Map or their financing shall be assured to the satisfaction of the City, consistent with the requirements of the Subdivision Map Act.*~~

- ~~*Offsite and onsite water distribution systems required to serve the subdivision shall be in place and contain water at sufficient quantity and pressure prior to the issuance of any building permits. Model homes may be exempted from this policy as determined appropriate by the City, and subject to approval by the City.*~~

Implementation of the above proposed General Plan policies and action items ~~and Mitigation Measure **MM 4.9.4**~~ would ensure that the new development under the General Plan would not proceed without verification and determination that an adequate water supply exists. As noted above, it is speculative that additional water supply sources would be available to serve buildout of the entire Planning Area. In addition, the proposed General Plan would contribute to identified significant environmental impacts associated with planned water supply projects as well as potential future other water supply sources. Given these conditions, this impact is considered **significant and unavoidable**."

- Draft EIR page 4.9-66, the following text changes are made under "Mitigation Measures":

"Implementation of the above proposed General Plan policies and action items ~~and Mitigation Measure **MM 4.9.4**~~ would ensure that the new development under the General Plan would not proceed without verification and determination that an adequate water supply exists. As noted above, it is speculative that additional water supply sources would be available to serve buildout of the entire Planning Area or development beyond. In addition, the proposed General Plan would contribute to identified significant environmental impacts associated with planned water supply projects as well as potential future other water supply sources. Given these conditions, this impact is considered **cumulatively considerable** and thus is **significant and unavoidable**."

4.10 Biological Resources

- Draft EIR page 4.10-42, and -43 the following changes are made to Mitigation Measure MM 4.10.1b:

"**MM 4.10.1b** The following measure shall be incorporated as an action item immediately under the above policy (MM 4.10.1a):

For those areas in which special status species are found or likely to occur or where the presence of species can be reasonably inferred, the City shall require mitigation of impacts to those species <u>that ensure that the project does not contribute to the decline of the affected species populations in the region to the extent that their decline would impact the viability of the regional population.</u> Mitigation shall be designed by the City in coordination with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG), and shall emphasize a multi-species approach to the maximum extent feasible. This may include development or participation in a habitat conservation plan."

- Draft EIR page 4.10-43, the following mitigation measure is added:

"**MM 4.10.1f** The following measure shall be incorporated as an action item under Policy NR.1.1:

As part of the consideration of development applications for individual Planning Areas containing habitats that support special-status plant and animal species that are planned to be preserved, the City shall require that these preserved habitats have interconnections with other habitat areas in order to maintain the viability of the preserved habitat to support the special-status species identified. The determination of the design and size of the "interconnections" shall be made by the City, as recommended by a qualified professional, and will include consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service."

- Draft EIR page 4.10-43, the following mitigation measure is added:

"**MM 4.10.1g** The following modifications shall be made to Action NR.1.2.1:

"Establish a Swainson's Hawk Ordinance in coordination with the California Department of Fish and Game to establish ~~help guide~~ the process of mitigating for the loss of Swainson's hawk foraging habitat based on habitat value lost to development. The ordinance will set forth a process where habitat lost to development will be mitigated through the permanent protection of equivalent or better existing habitat conditions (referred to hereafter as "mitigation lands"). The specific required mitigation ratios (habitat acreage lost versus mitigation lands) and any other provisions to mitigation process shall be established through technical studies as part of the development of the ordinance and will take into account value of habitat to be converted in relation to habitat value of the mitigation lands (e.g., relation to nesting sites), proximity of the mitigation lands to adjacent conditions affecting habitat (e.g., nearby land uses and already permanently protected lands), and other relevant factors. The ordinance will also establish standards ensuring that mitigation land will be adequately protected and managed in perpetuity (e.g., via conservation easement, deed restriction or other appropriate method), and setting forth the timing of the required provision of mitigation lands in relation with the timing of the loss of habitat in the City (as its boundaries may be changed through subsequent annexations), such that mitigation lands shall be provided no later than prior to ground disturbance."

- Draft EIR page 4.10-48, the following text change is made under "Mitigation Measures":

"Implementation of the above General Plan policies, action items and mitigation measures MM 4.10.1a through g~~e~~ would partially mitigate any direct or indirect impacts to non-listed special-status species in the General Plan Planning Area though there will an overall loss of non-listed special-status and their habitat in the Planning Area. Therefore, implementation of the General Plan will result in **significant and unavoidable** impacts to listed species."

- Draft EIR page 4.10-63, the following text change is made under "Proposed General Plan Policies and Action Items That Provide Mitigation":

"There are no proposed General Plan policies or action items that address the SSHCP."

- Draft EIR page 4.10-68, the following text change is made under "Mitigation Measures":

  "Implementation of the above General Plan policies, associated action items and mitigation measures MM 4.10.1a through g~~e~~, MM 4.10.3, and MM 4.10.5a through c would reduce the General Plan's contribution to cumulative biological impacts in the region. However, the General Plan's contribution to cumulative and significant biological resource impacts for the region would still be **cumulative considerable** and is considered a **significant and unavoidable** impact. The only mitigation for such impacts – restricting the majority of development proposed in the General Plan– is not considered feasible, given that it would fundamentally conflict with the objectives of the General Plan identified in Section 3.0 of this document."

4.11 Cultural and Paleontological Resources

- Draft EIR page 4.11-15, the following text change is made to Mitigation Measure MM 4.11.2:

  "MM 4.11.2 The following text change shall be made to Action CHR.1.3.1 ~~3.3.3~~:

  Require historic resources and paleontological studies (i.e., archaeological and historical investigations) for all applicable discretionary projects, in accordance with CEQA regulations. The studies should identify paleontological, historic or cultural resources in the project area, determine their eligibility for inclusion in the California Register of Historical Resources, and provide mitigation measures for any resources in the project area that cannot be avoided."

4.12 Public Services and Utilities

- Draft EIR page 4.12-14, the following change is made to the second paragraph:

  "The City's Police Department utilizes several "in-house" targets for planning purposes, including the goal of providing ~~one~~ 1.3 officers per every 1,000 citizens and one support staff member for every three officers – a standard that was adopted from the Sacramento County Sheriff's Department. Likewise, the Police Department's goal is to maintain an average response time for Priority One calls for service of five minutes or less. A Priority One call is a violent crime against a person or emergencies requiring an immediate response in order to preserve a life. Daily assessments are conducted on a call-by-call basis with the goal of improving the Department's response times."

- Draft EIR page 4.12-16, the following change is made to the last sentence:

  "Based on the SCSD standard of one officer per 1,000 residents, an estimated total of 404 ~~311~~ officers (283 ~~190~~ new officers under buildout conditions) and equipment (i.e., patrol cars, radios, etc) would be required to maintain adequate service levels."

- Draft EIR page 4.12-17, the following changes are made to the second and third full paragraphs:

  Second paragraph

"Current population within the Planning Area outside of the existing City limits is estimated to be 48,033 persons. Under buildout conditions, the projected population in this area is 108,069 persons, or an increase of 60,036. Based on the SCSD officer per population ratio, an estimated 78 ~~60~~ new officers would be needed to serve the increase in population."

Third paragraph

"With an estimated current City population of 55,109 (DOF, 2005), the City is expected to increase by 237 percent or 130,418 persons under buildout conditions. This increase would result in the need for 170 ~~130~~ new sheriff officers to comply with the SCSD officer/population ratio."

- Draft EIR page 4.12-25, the following changes are made to the last paragraph:

"The existing water supply system in the Planning Area consists of Zone 40 facilities, including various raw and treated water transmission lines, distribution mains, pump stations, inertias, and treatment facilities. The following is an overview of water supply infrastructure in the Planning Area by service provider."

- Draft EIR page 4.12-26, the following changes are made to this page:

"In order to achieve the objectives of the Zone 40 Water Supply Master Plan, SCWA has developed ~~requires~~ a steering document, known as the WSIP, to ensure reliable long-term water supplies and adequate water supply infrastructure for its present and future customers ~~in the Sunrise Corridor/Mather/Sunrise Douglas Service areas~~. The objectives of the Water Supply Infrastructure Plan (WSIP) are to provide a comprehensive evaluation of SCWA's water supplies, and to identify the likely alternative of water diversion(s), treatment, and conveyance facilities to efficiently make use of SCWA's water entitlements. Individual water studies require approval by SCWA and may include development specific conditions including requirements for reservation of land for larger water facilities and phasing of water facilities to accommodate logical growth patterns.

~~As a part of the master plan process, SCWA initiated the Zone 40 WSIP. This WSIP is a small piece of a larger strategic plan for conjunctive use of surface water and groundwater as set forth in the Master Plan document. This WSIP was integrated with a larger WSIP that included the entire Master Plan area. Smaller distribution facilities have not been included in the WSIP, but were evaluated and documented in water studies developed for specific projects. Individual water studies require approval by SCWA and may include development specific conditions including requirements for reservation of land for larger water facilities and phasing of water facilities to accommodate logical growth patterns.~~

~~Existing Zone 40 water facilities include a transmission, distribution, and storage system with approximately 35 million gallons per day (mgd) of groundwater production facilities. Zone 40 has also purchased 11 mgd of nondedicated surface water capacity from the City of Sacramento's Sacramento River Water Treatment Plant. Additional facilities will be required for production, treatment, storage, and conveyance of water supplies to Zone 40 in accordance with the proposed 2002 Zone 40 WSMP.~~

Vineyard ~~Zone 40 Central~~ Water Treatment Plant. SCWA is proposing to ~~plans to~~ construct the Vineyard ~~78-acre~~ ~~Central~~ Water Treatment Plant (VWTP~~CWTP~~) and associated water supply facilities to provide up to 100 ~~85~~ million gallons per day (mgd) of potable water to existing and approved urban development within the SCWA Zone 40 area. The VWTP ~~CWTP~~ site is

located west of the intersection of Florin and Excelsior roads, at the northeast corner of Florin and Knox Roads, west of the Florin Road/Excelsior Road intersection in Sacramento County. ~~An associated SCWA corporation yard to house facilities and store equipment would be collocated on the site, along with a groundwater treatment facility.~~ The VWTP ~~CWTP~~ would have the capacity to treat 100 ~~85~~ mgd of raw surface water and remediated ~~13 mgd of raw~~ groundwater to serve approved land uses in the Zone 40 service area. Initial phases of facility construction are anticipated to be completed by 2010 with full buildout by 2029~~2019~~.

Freeport Regional Water Project (FRWP). SCWA and East Bay Municipal Utility District are constructing a diversion structure on the Sacramento River near the community of Freeport and a raw-water conveyance pipeline from the diversion structure to the central portion of Zone 40. As discussed above, SCWA would construct a 100~~85~~-mgd surface-water treatment facility in the central portion of Zone 40 (VWTP~~CWTP~~), and the associated treated-water conveyance pipelines to deliver water to SCWA customers. This project is anticipated to be completed by 2010."

- Draft EIR page 4.12-27, the following changes are made to the first and second paragraph:

"…water supplies to serve existing or proposed development within Zone 40. Ultimately it would consist of up to eight wells located near Excelsior Road and Florin Road with a 30-inch raw-water pipeline to convey water to the ~~a new water treatment plant (~~Anatolia Water Treatment Plant~~)~~ located near the southeast corner of the intersection of Sunrise Boulevard and Douglas Road in the Sun Ridge Specific Plan area). The first phase consists of three wells (4,500 gallons per minute [gpm]) and will ~~would~~ be expanded as new development or replacement supplies are needed. If wells within SCWA's Mather/Sunrise system (in the south west portion of the Planning Area) are shut down because of past groundwater contamination, any additional capacity remaining in the well field can be claimed as a replacement supply (as opposed to a new water supply) by SCWA. This project is currently being constructed, with the initial phase of this project is operational ~~estimated to be complete at the end of 2006~~. The project is expected to be built out by 2011. Water from this project has been allocated to the approved Sun Ridge Specific Plan area within the City and is also anticipated to be the initial water source for the proposed The Preserve at Sunridge project immediately south of the Sun Ridge Specific Plan area (see Appendix 4.9).

Eastern County Replacement Water Supply Project. The Eastern County Replacement Water Supply Project (RWSP) is a proposal by SCWA to use remediated groundwater obtained through the agreements between the County, SCWA, GenCorp and McDonnell Douglas Corporation/Boeing for replacement of water lost as a result of past activities resulting in groundwater contamination in the Rancho Cordova area, for new development on Aerojet lands, and for environmental enhancement. SCWA has initiated environmental review of this project, which evaluates several discharge, diversion and treatment options for use remediated groundwater from GenCorp and McDonnell Douglas Corporation/Boeing groundwater extraction and treatment (GET) facilities. The RWSP would identify the necessary facilities and timing of delivery of remediated water. Environmental review is anticipated to be completed by late summer 2006, with construction of all project-related facilities completed by year 2010. The RSWP water would be conveyed through the VWTP. ~~This project is a proposal by SCWA to use remediated groundwater supplies obtained through the agreements between the County, SCWA, Aerojet, and McDonnell Douglas Corporation for replacement water lost as a result of past groundwater contamination in the Sunrise corridor area. The remediated groundwater would replace lost groundwater supplies of Cal-Am or GSWC or would be used to serve new urban development on lands known as Aerojet lands in the northern portion of Zone 40 and for enhanced fishery flows along the~~

~~Cosumnes River. This project currently is under environmental review and facilities included within this project are anticipated to be constructed by 2010.~~

- Draft EIR page 4.12-29, the following changes are made to the third paragraph:

  "~~The recycled water facility component consists of pipelines, storage, and pumping capacity to deliver recycled water to customers within Zone 40. The recycled water component requires a distribution system separate from Zone 40's potable water system. Phase I of this system is complete and operational. Phase II is currently underway and consists of additional transmission pipelines, storage capacity, booster pumps, and localized distribution systems. As noted below, General Plan policy supports the use of recycled water and further expansion of recycled water infrastructure would be required.~~ "

- Draft EIR page 4.12-37, the following text change is made under "Mitigation Measures":

  "Implementation of the above General Plan policies and action items ~~as well as implementation of Mitigation Measure MM 4.9.4~~ would ensure that the new development under the General Plan would not proceed without verification and determination that an adequate water supply and adequate water supply infrastructure exists, and not contribute to service area shortfalls in service. However, the proposed General Plan would contribute to identified significant environmental impacts associated with planned water supply and infrastructure projects as well as environmental effects from potential future other water supply sources and infrastructure projects. This contribution is **cumulatively considerable** and thus is considered **significant and unavoidable**."

- The following changes were made to page 4.12-38, 1st paragraph, last sentence:

  "Under the Master Interagency Agreement (MIA), ~~that~~ which defines the operational, financial, and administrative responsibilities of the SRCSD, the County of Sacramento and the Contributing Agencies ~~SRCSD is~~, these agencies are responsible for ~~the planning~~ and financing~~, of any new sewer facilities~~ construction, reconstruction, operation and maintenance of all facilities for the conveyance, treatment, and disposal of sanitary sewage and industrial waste in the Sacramento area".

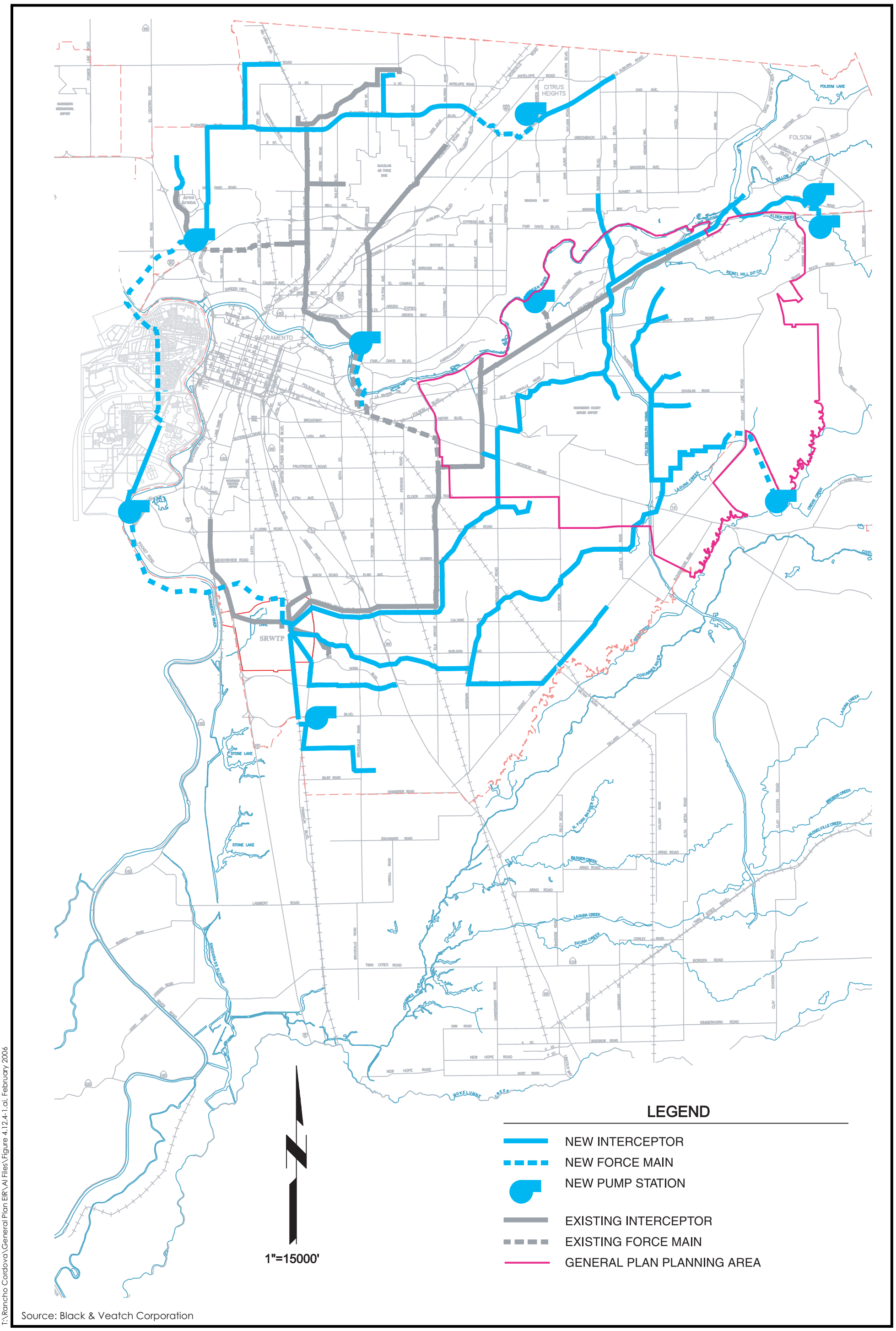
- The following changes were made to page 4.12-40, 3rd paragraph:

  - **"County Sanitation District 1 Sewerage Facilities Expansion Master Plan** - The overall goal of the CSD-1 Sewerage Facilities Master Plan (Master Plan) is to estimate the future capital improvement needs of the CSD-1 trunk sewer system, both in capacity relief projects for the existing system and expansion projects to serve newly developed areas. This plan provides for sewerage facilities and relief sewers to address future development within CSD-1's service area and to minimize the risk from potential sewer overflows that could occur during storm events. This plan also addresses the financial aspects of the CSD-1 Trunk Expansion Program. Currently, CSD-1 is in the process of updating the Master Plan, re-analyzing the required trunk facilities and updating the costs."

- The following changes were made to reflect CSD-1's comments to page 4.12-40, 4th paragraph:

  "There are two trunk systems in the Planning Area, the Cordova Trunk System and the Folsom Interceptor Trunk System, although several new truck systems are planned for the Planning Area to serve new development."

- Draft EIR page 4.12-41, Figure 4.12.4-1 is updated as shown below.



Source: Black & Veatch Corporation

T:\Rancho Cordova\General Plan EIR\AI Files\Figure 4.12.4-1.ai, February 2006

City of Rancho Cordova
Planning Department

Figure 4.12.4-1
SRCSD Interseptor Upgrades and Expansions

"Every year, the Business Planning and Budget Group at SMUD publishes its Load Forecast and Economic Outlook, analyzes and evaluates the estimated power usage over the next ten years and plans for electrical generation and purchase to cover this usage. In the latest such report, SMUD has indicated that it would have adequate supply and infrastructure to serve the electricity demands generated from the Rancho Cordova General Plan under buildout conditions and, which is estimated at approximately 1,200 ~~1,100~~ MW, in addition to meeting other demands within its service area (Angeja, January 2006). PG&E has also indicated that it has adequate natural gas supply and would extend infrastructure, as needed, to serve the growth anticipated under cumulative conditions."

4.13 Visual Resources/Light and Glare

- Draft EIR page 4.13-19, the following text change is made:

  "~~Caltrans Division of Aeronautics regs/guidelines/standards?~~

  ~~Current proposed parkway plan~~?"

5.0 Cumulative Impacts Summary

No changes were made to this section.

6.0 Project Alternatives

No changes were made to this section.

7.0 Long-Term Implications

- Draft EIR page 7.0-3, the following text change is made under "Environmental Effects of Growth":

  "~~*NR.9.1 Encourage small-scale agricultural practices along the edges of the Planning Area to facilitate the transition of density.*~~"

8.0 Report Preparers

No changes were made to this section.

- The following changes were made to page 4.12-45, 1st paragraph:

  "Rehabilitation is ~~a~~ program specific not project specific plan. It is a system wide area wide plan. ~~They~~ CSD-1 reviews maintenance records and age of system to determine what needs to be done. Sometimes it includes cleaning or replacing or relining a pipe. It is an ongoing program. Areas with many service calls or older pipes will receive more maintenance and rehabilitation. (Paul Philleo, Department of Water Quality CSD-1)."

- The following changes were made to page 4.12-46, 2nd paragraph, last sentence:

  "The Master Plan identifies several future trunk sheds proposed in the Planning Area to accommodate the estimated effluent flows including AJ Aerojet, BR Zinfandel, BE Gravel East, MA Mather/Kiefer, AJ Douglas White Rock, DC Upper Deer Creek, AJ Sunrise Douglas, ~~and the~~ LC Upper Laguna Creek, BR Elder Creek, and LC Eagles Nest."

- The following changes were made to page 4.12-46, 3rd paragraph, 1st sentence:

  "Project developers initially finance construction of trunk lines, collector lines, and appurtenances, with some of the costs being reimbursed by ~~SRCSD~~ CDS-1".

- The following changes were made to page 4.12-47, 2nd paragraph:

  "Both EIRs were certified and the Master Plans were approved. Because these facilities would be constructed to serve the project, as well as other development in the region, the environmental impacts of these facilities are associated with development of the project. However according to CSD-1, t~~T~~hese impacts ~~would also~~ may not occur without development of the project; ~~because the trunk and interceptor lines are required to serve regional development, they would be required whether or not the project is developed~~ as trunk sewers would not be constructed and interceptor sewers may not be constructed. (Paul Philleo, Department of Water Quality CSD-1)."

- The following changes were made to page 4.12-52, 3rd paragraph, last sentence:

  "Additionally, CSD-1 uses SACOG dwelling unit projections to determine future wastewater flows. In the year 2020, CSD-1 estimates an ESDs of ~~351,800~~ 474,156 units, which calculates to a ~~134~~ 155 mgd average wastewater flow for the anticipated future CSD-1 service area (CSD-1)."

- Draft EIR page 4.12-71, the following changes are made to the first and second paragraphs:

  "The Elk Grove ~~unified~~ Unified School District (EGUSD) has more than doubled in the past decade and is expected to experience the same level of growth through 2010. The District covers nearly 320 square miles and has been in existence for over 41 years. The EGUSD boundaries encompass the entire City of Elk Grove, portions of the City of Sacramento and the City of Rancho Cordova, and most of southern Sacramento County. The District currently serves more than ~~52,500~~ 60,000 students and expects to reach 73,000~~80,000~~ students by 2010. Due to constant increases in population, the Elk Grove Unified School District has made several adjustments to its ~~district~~ school boundaries over the past 5 years.

  According to EGUSD, enough new families move into the District to fill a classroom every week ~~three to five days~~. To keep up with this growth, the district will need to build approximately ~~four~~ two schools every year. These schools are needed to accommodate growth. ~~and allow the district to lower the enrollments at its middle and high schools.~~ As the

district opens new schools, school boundaries will also change. With more than 320 square miles, the district will continue to grow for the foreseeable future. Elk Grove will need to house a projected enrollment of ~~80,000~~ 73,000 students by 2010, and thousands of homes are scheduled to be built after 2010."

- Draft EIR page 4.12-74, the following changes are made to Draft EIR Table 4.12.6-6:

TABLE 4.12.6-6
STUDENT GENERATION RATES FOR THE EGUSD

School Type	Single Family Residence (K-12 students/residence)	Multi-Family Residence (K-12 students/residence)
Elementary (K-6)	~~0.4398~~ 0.4367	~~0.3057~~ 0.2523
Middle 7-8)	~~0.1238~~ 0.1222	~~0.0730~~ 0.0654
High (9-12)	~~0.2007~~ 0.2181	~~0.1587~~ 0.1421
Total	~~0.7643~~ 0.7771	~~0.5374~~ 0.4598

Source: ~~EGUCD School Facilities Master Plan, 2002-2010~~ Grambusch, 2006

- Draft EIR page 4.12-104, the first paragraph under Impact 4.12.8.1 is modified as follows:

"Under buildout conditions as identified in the General Plan, the demand of electricity may reach up 1,200 MW including existing and projected future loads. Of this, approximately 650 MW of electrical power would be needed within the existing city limits and 550 MW for portions of the Planning Area outside the current city boundaries. To serve the anticipated development through 2020, SMUD requires several new distribution substations and new 69kV and 12kV lines. In addition, SMUD is constructing a new 230 kV to 69 kV bulk power substation within the SunRidge Specific Plan area, south of Douglas Road and east of Sunrise Boulevard. This substation will be integrated into the existing substation, transmission, and delivery system. To deliver the electricity beyond 2020, SMUD has indicated the need for additional distribution ~~new~~ substations, and new 69 kV and 12 kV lines. New overhead 69 kV power lines would be installed within the existing transmission line corridors to reduce visual and other potential environmental impacts, where feasible. SMUD annually updates its demand projections and will modify and update its system plans in response to growth. In addition to electric facilities, SMUD requests specific power line easements and right of ways during the planning stages of new development. All electrical distribution lines, substations, transmission, delivery facilities, and easements required to serve the Planning Area are subject to CEQA review. SMUD does not foresee any capacity shortages or problems in meeting the buildout demands associated with the Rancho Cordova General Plan (Angeja, 2006). Potential environmental effects of obtaining more power through the development of power plants include, but are not limited to, air quality, biological resources, cultural resources (depending on location), hazardous materials, land use, noise and vibration, traffic, visual resources, waste management, water and soil resources, and health hazards. Potential environmental effects for the construction of transmission lines include, but are not limited to, air quality (during construction), biological resources (depending on location), cultural resources (depending on location), hazardous materials, land use, noise and vibration (during construction), traffic, visual resources, and health hazards."

- Draft EIR page 4.12-107, the following text changes are made to the last paragraph:

APPENDIX A – REVISED WATER SUPPLY EVALUATION

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ACRONYMS AND ABBREVIATIONS

Act	Urban Water Management Planning Act
afy	acre-feet per year
Agency Act	Sacramento County Water Agency Act
ASWC	American States Water Company
Cal-Am	California-American Water Company
Central Basin	Central Sacramento County Groundwater Basin
CEQA	California Environmental Quality Act
cfs	cubic feet per second
City	City of Rancho Cordova
Coloma WTP	Coloma Water Treatment Plant
CPUC	California Public Utilities Commission
CSCGF	Central Sacramento County Groundwater Forum
CVP	Central Valley Project
~~CWTP~~Vineyard WTP	~~Central~~ Vineyard Water Treatment Plant
Delta	Sacramento San Joaquin River Delta
DWR	California Department of Water Resources
EPA	United States Environmental Protection Agency
FRDS	Freeport Regional Diversion Structure
GMP	Groundwater Management Plan
gpm	gallons per minute
GSWC	Golden State Water Company
IGSM	Sacramento County Integrated Groundwater Surface Water Model
JPA	Joint Powers Authority
LAFCO	Sacramento County Local Agency Formation Commission
mgd	million gallons per day
NDMA	N-nitrosodimethylamine
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
OHWD	Omochumne-Hartnell Water District
POU	Place of Use
PSA	Purveyor Specific Agreements
Pyrites WTP	Pyrites Water Treatment Plant
Reclamation	U.S. Bureau of Reclamation
SACOG	Sacramento Area Council of Governments
SB	Senate Bill
SCWA	Sacramento County Water Agency
SMUD	Sacramento Municipal Utility District

SRCSD	Sacramento Regional County Sanitation District
SSWD	Sacramento Suburban Water District
SWP	State Water Project
SWRCB	State Water Resources Control Board
UPA	Urban Policy Area
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VOC	volatile organic compounds
WFA	Water Forum Agreement
WRMP	Water Recycling Master Plan
WSA	Water Supply Assessment
WSMP	Water Supply Master Plan

1 EXECUTIVE SUMMARY

This technical memorandum addresses water supply issues for the City of Rancho Cordova's (City) General Plan and General Plan EIR. It identifies the regional water supply regulatory and planning environment; water purveyors that currently provide water service within the City; water demands associated with buildout of the City's corporate limits (estimated to build out by 2030) and larger planning area (assumed, for purposes of this analysis, to build out by 2050; an actual build out year has not been determined) identified in its Draft General Plan; existing available water supplies that could meet a portion of the City's projected buildout water demands (e.g., buildout of planning area); the area within the City for which long-term water supplies have been secured (e.g., approved and planned projects/existing development); potential future sources of water to meet remaining buildout water demands; and a brief summary of the potential environmental impacts associated with delivering future water supplies to the City.

Because of the long planning horizon associated with buildout of the City's corporate limits (i.e., approximately 2030) and the City's planning area (i.e., approximately 2050), this water supply evaluation provides a summary of relevant water supply data based on information readily available from the City (land use plans and associated demands) and local water purveyors (existing and planned future water supplies and distribution facilities).

The City has identified two land use plans that contemplate a development pattern for land inside and outside its current corporate limits. Buildout of the City's corporate limits (approximately 20,000 acres) is anticipated to occur by 2030, while buildout of its planning area (an area approximately 3 times the size of the corporate limits) is not certain, but assumed to occur by 2050.

There are three water purveyors within the City's planning area: Sacramento County Water Agency (SCWA), Zone 40; Golden State Water Company (GSWC); and California-American Water Company (Cal-Am). Urban Water Management Plans (UWMP) for all water purveyors were obtained and used in this evaluation. The UWMPs identified the purveyor's existing and projected future water supplies and projected water demands through 2030 within each of their service areas.

SCWA's service area (i.e., Zone 40) encompasses approximately 70% of the City's planning area and SCWA would be the primary water purveyor within the City. SCWA has engaged in a long-term water supply planning process through its participation in the regional Water Forum planning process and the recent adoption of its *Zone 40 Water Supply Master Plan* (WSMP) (2005). The WSMP identifies the acreage of land area that could be served by existing and projected future water supplies through 2030 for an expected growth area of Sacramento County (as identified in the Sacramento County General Plan [1994]), based on planned land use pattern and density information available at the time the report was prepared. This area is known as the 2030 Study Area. SCWA's water supplies include surface water and groundwater resources that would, over the long-term, be conjunctively used to ensure that adequate groundwater levels are maintained throughout the Central Sacramento Groundwater Basin (Basin) and that both surface water and groundwater supplies are adequate to meet projected demands through 2030. While a majority of the City's planning area falls within Zone 40, only a portion falls within a subarea known as the 2030 Study Area.

Golden State Water Company (GSWC) also serves a portion (generally the northeastern portion) of the City's planning area. GSWC owns and operates the Cordova System, a water treatment and conveyance system that serves GSWC's service area. GSWC relies on both surface and groundwater to meet water demands within its service area. GSWC is projecting buildout within its service area by 2020.

Cal-Am is a privately owned water purveyor that provides urban water supply to portions of Sacramento including an area in Rancho Cordova located near Sunrise Boulevard and Douglas Road. Cal-Am pumps groundwater and purchases wholesale water from SCWA. Cal-Am is projecting buildout within its service area by 2025.

Based on an analysis of potential supply and demand, it is likely that adequate supplies would be available to meet the City's water demands (i.e., 57,299 afy) associated with buildout of its corporate limits (see Section 5.3, "Availability of Supplies to Meet Projected Demands within the City of Rancho Cordova General Plan Planning Area"). However, based on total known future supplies (i.e., 77,620 afy), there would be a supply shortfall of approximately 51,089 afy to meet the City's total planning area demands (i.e., 128,709 afy). This shortfall occurs if development exceeds the total amount associated with buildout of the corporate boundaries.

If water supplies are not available to meet buildout water demands, the City would either need to stop approving new growth within its jurisdiction, or collaborate with regional water purveyors to investigate potential future water supply options within the context of the regional water supply planning environment. Investigation of future water supply options would likely require involvement from local water purveyors (GSWC, Cal-Am, and SCWA at a minimum, and other neighboring purveyors as appropriate), the Water Forum successor effort, and environmental groups. Because of the long-term and sometime contentious nature of new water supply planning, the feasibility of implementing new water supply options beyond those described in the Water Forum Agreement (a regional water supply plan, described in Section 3.3.1m "Water Forum Agreement") are unknown and speculative. Potential new water supply options that the City could pursue (in collaboration with local agencies/entities) to develop supplies to meet its planning area buildout water demands are listed below and described in greater detail in Section 5.4, "Future Water Supplies."

- Water transfers and exchanges with nearby water purveyors;
- Improved groundwater sustainability; and
- Expanded use of Recycled Water.

2 INTRODUCTION

The City of Rancho Cordova (City) is in the process of preparing, and ultimately will consider, the adoption of the *City of Rancho Cordova General Plan*. A general plan is the principal planning document that provides a blueprint for development within a community. A general plan addresses all aspects of development including housing, traffic, natural resources, open space, safety, land use, and public facilities (including water supply and facilities). Under state planning law, the General Plan must include a comprehensive, long-term plan for the physical development of both the City of Rancho Cordova and any land outside the corporate boundaries that the City has determined relates to its planning.

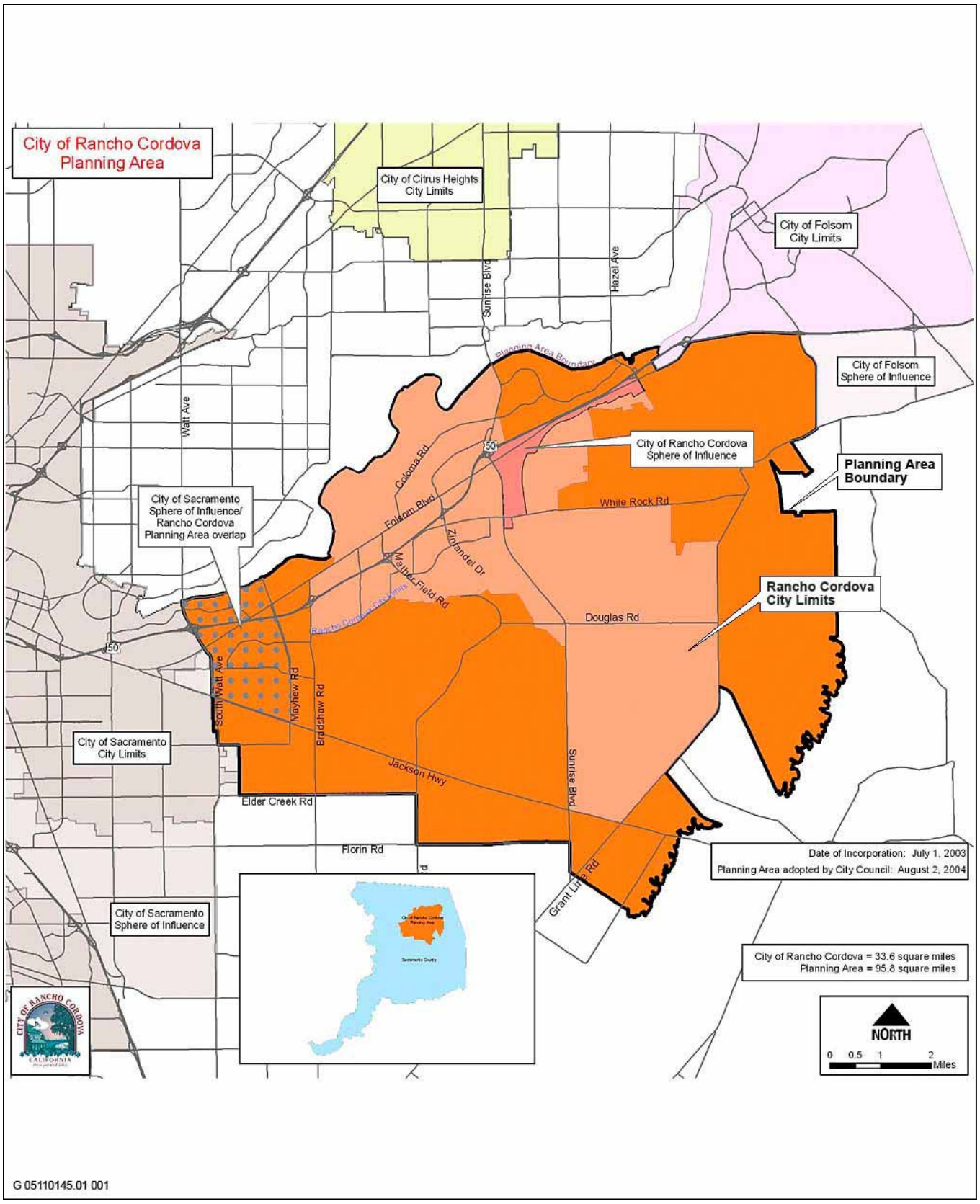
The City's General Plan outlines goals, objectives, and policies related to how growth and development would be allowed to proceed over a defined planning horizon. In addition, the City is required to prepare seven mandatory elements and any optional elements it deems necessary. The City's General Plan consists of the following elements:

- Land Use Element
- Circulation Element
- Housing Element
- Air Quality Element
- Open-space, Parks, and Trails Element
- Noise Element
- Safety Element
- Urban Design Element
- Economic Development Element
- Infrastructure, Services, and Finance Element
- Natural Resources Element
- Cultural and Historic Resources Element

In compliance with the California Environmental Quality Act (CEQA), the City is preparing an environmental impact report (EIR) that evaluates the environmental effects associated with implementation of its general plan. The City's General Plan and EIR are scheduled to be considered by the City Council in June 2006.

The city of Rancho Cordova is generally located in north central Sacramento County, immediately east and south of the city of Sacramento and west and south of the city of Folsom. Unincorporated lands under the jurisdiction of the County of Sacramento (County) border Rancho Cordova to the south. The city of Rancho Cordova consists of approximately 34 square miles of land (i.e., approximately 20,000 acres); its limits extend from Bradshaw Road on the west to the American River Parkway on the north, Grant Line Road on the east, and Jackson Highway on the south (Exhibit 1). As described above, state planning law requires that an agency consider and plan for areas within its jurisdiction and any areas outside its jurisdiction that would relate to its planning. As such, the City has identified a defined "Planning Area" (herein referred to as the "planning area") for its General Plan. This area consists of approximately 99 square miles of land (i.e., 61,383 acres) (areas in the city and unincorporated county), which is approximately three times the area currently within the City's corporate limits. In general, the City has included within its planning area those unincorporated county areas that border the city to the southwest and east. The planning area is generally bounded by Watt Avenue to the west, the American River to the north, Prairie City Road to the east, and Jackson Highway to the south (Exhibit 1).

This water supply evaluation addresses water supply issues associated with the City's plans for growth and development within its planning area. Where relevant, this document describes existing and projected water supply demands for areas that fall within the city limits (i.e., 20,000 acres) and for the larger planning area (i.e., 61,383 acres) as a whole. This water supply evaluation includes the following elements:



Source: City of Rancho Cordova 2006

City of Rancho Cordova General Plan Planning Area **Exhibit 1**

- **Chapter 1, "Executive Summary":** This chapter provides a summary of the results of this water supply evaluation.
- **Chapter 2, "Introduction":** This chapter describes the City's General Plan, the planning area under consideration, and organization of the water supply evaluation.
- **Chapter 3, "Regulatory and Planning Environment for Water Supply":** This chapter describes relevant legislation; water purveyors and agencies; related plans, projects, and agreements; and water resources within the Sacramento region.
- **Chapter 4, "Existing and Projected Water Demand and Supply":** This chapter describes the existing and projected water demands and available supplies for water purveyors in the City's planning area.
- **Chapter 5, "Projected Water Demands for the City of Rancho Cordova General Plan Planning Area":** This chapter describes the method by which water demands are projected, projected water demands within the Rancho Cordova city limits and for the City's larger planning area, the availability of known supplies to meet projected demands, and potential future supplies that could serve the city.
- **Chapter 6, "Potential Environmental Impacts Associated with Delivering Water to the City's Planning Area":** This section provides a brief summary of the potential environmental impacts that could occur with diversion, conveyance, treatment, and discharge of water supplies need to meet projected demands within the City's planning area.
- **Chapter 7, "References":** This chapter sets forth a comprehensive listing of all sources of information used in the preparation of this document.

3 REGULATORY AND PLANNING ENVIRONMENT FOR WATER SUPPLY

The planning, procurement, and management of new water supplies to meet the existing and projected future water demands within Rancho Cordova is a complex undertaking involving the coordination of numerous federal, state, and local agencies. The decision to pursue a local water supply project is subject to the issuance of water rights; environmental review under CEQA and sometimes the federal equivalent, the National Environmental Policy Act (NEPA); and other regulatory permitting requirements. Often it involves resolving complex issues among competing interests (e.g., development versus environmental interests).

California's complex scheme of rights to surface water and groundwater is based on the state's constitution, statutes, and common law. Rights to surface water are governed by a hybrid system of riparian and appropriative rights that are administered by the State Water Resources Control Board (SWRCB) and water rights established before the advent of the SWRCB's jurisdiction in 1914. Under riparian rights, users are entitled to make reasonable use of the natural flow of water in the watercourse to which their properties adjoin. Appropriative rights are established by diverting surplus water for non-riparian uses. Riparian water rights are essentially coequal ("correlative"), but are superior to appropriative rights. Water is allocated among appropriative users based on seniority, under the principle of "first in time, first in right." Accordingly, pre-1914 water rights trump appropriative rights established by the SWRCB.

Groundwater that flows in subterranean streams is allocated by the SWRCB according to the rules applicable to surface waters. Rights to groundwater that does not flow in such streams ("percolating" groundwater) are not administered by any state agency, but may be adjudicated by courts on a case-by-case basis (and, to some extent, may be regulated by local governments). When groundwater becomes overdrafted (i.e., more groundwater is pumped out of the basin than is replenished by natural or artificial systems), overlying users have first priority in using the available water, followed by appropriative users (i.e., users of groundwater not overlying the property from which it was pumped) in order of seniority. Where an appropriative user has been continuously withdrawing water from an overdrafted aquifer for more than 5 years, the appropriative right may become a prescriptive right, which is effectively treated as an overlying right for purposes of groundwater allocation.

Both surface water rights and groundwater rights are subject to a requirement in the state constitution that the end use be reasonable and beneficial.

3.1 WATER PLANNING–RELATED LEGISLATION

3.1.1 URBAN WATER MANAGEMENT PLANNING ACT

Each urban water supplier in California is required to prepare an Urban Water Management Plan (UWMP) and update the plan on or before December 31 in years ending in 5 and 0, pursuant to California Water Code Sections 10610–10657, as last amended by Senate Bill (SB) 318 (2004), the Urban Water Management Planning Act. SB 318 is the 18th amendment to the original bill requiring a UWMP, which was initially enacted in 1983. Amendments to SB 318 have focused on ensuring that the UWMP emphasizes and addresses drought contingency planning, water demand management, reclamation, and groundwater resources.

Under the current law, all urban water suppliers with more than 3,000 service connections or water use of more than 3,000 acre-feet per year (afy) are required to submit an UWMP to the California Department of Water Resources (DWR) every 5 years.

3.1.2 SENATE BILL 610

SB 610 (Chapter 643, Statutes of 2001) became effective January 1, 2002. The purpose of SB 610 is to strengthen the process by which local agencies determine the adequacy and sufficiency of current and future water supplies to meet current and future demands. SB 610 amended the California Public Resources Code to incorporate Water Code requirements within the CEQA process for certain types of projects. SB 610 also amended the Water Code to broaden the types of information included in a UWMP (Water Code Section 10620 et seq.). SB 610 consists of two primary components, the UWMP (described above) and the Water Supply Assessment (WSA) (Water Code Sections 10910–10915).

WATER CODE PART SECTION 10910

Water Code Section 10910 et seq. defines the projects for which the preparation of a WSA is required as well as the lead agency's responsibilities related to the WSA. The Water Code also clarifies the roles and responsibilities of the lead agency under CEQA and of the water supplier (i.e., public water system) with respect to describing current and future supplies compared to current and future demands. A WSA is required for:

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- a proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- a proposed hotel or motel, or both, having more than 500 rooms;
- a proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- a mixed-use development that includes one or more of the uses described above;
- a development that would demand an volume of water equivalent to or greater than the volume of water required by a 500-dwelling-unit project; and
- for lead agencies with fewer than 5,000 water service connections, any new development that would increase the number of water service connections in the service area by 10% or more.

Under Section 10910 of the Water Code, the lead agency must identify the affected water supplier and ask the supplier whether the new demands associated with the project are included in the supplier's UWMP. If the UWMP includes the demands, it may be incorporated by reference in the WSA (Water Code Section 10910[c][2]). If there is no public water system to serve the project, the lead agency must prepare the WSA (Water Code Section 10910[b]).

3.1.3 SENATE BILL 221

SB 221 requires a city or county to include as a condition of approval of any tentative map, parcel map, or development agreement for certain residential subdivisions a requirement that a "sufficient water supply" be available. Proof of a sufficient water supply must be based on a written verification from the public water system that would serve the development.

3.2 WATER PURVEYORS AND RELATED AGENCIES

The federal, state, regional, local, and private entities that could be involved in the City's water supply planning and development process are described below.

3.2.1 FEDERAL AGENCIES

U.S. BUREAU OF RECLAMATION

The U.S. Bureau of Reclamation (Reclamation) is part of the U.S. Department of the Interior and is responsible for the development and conservation of much of the water resources in the western United States. While the original purpose of Reclamation was to provide for the reclamation of arid and semiarid lands in the west, the agency's current mission covers a wider range of interrelated functions. These functions include providing municipal and industrial water supplies through the Central Valley Project (CVP); generating hydroelectric power; providing irrigation water for agriculture; improving water quality, flood control, and river navigation; providing river regulation and control and fish and wildlife enhancement; offering water-based recreation opportunities; and conducting research on a variety of water-related topics.

U.S. FISH AND WILDLIFE SERVICE AND NATIONAL MARINE FISHERIES SERVICE

The U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS), in cooperation with other federal and state agencies, enforce the federal Endangered Species Act by evaluating the potential for impacts on candidate, threatened, and endangered fish and wildlife resources.

U.S. ARMY CORPS OF ENGINEERS

The U.S. Army Corps of Engineers (USACE) is responsible for issuing permits for the placement of fill or discharge of material into waters of the United States. These permits are required under Sections 401 and 404 of the Clean Water Act. Water supply projects that involve instream construction, such as dams or other types of diversion structures, trigger the need for these permits and related environmental reviews by USACE. USACE also is responsible for flood control planning and assisting state and local agencies with the design and funding of local flood control projects.

U.S. GEOLOGICAL SURVEY

The U.S. Geological Survey (USGS) National Water Use Information Program is responsible for compiling and disseminating the nation's water-use data. USGS works in cooperation with federal, state, and local environmental agencies to collect water-use information at the local level.

3.2.2 STATE AGENCIES

CALIFORNIA DEPARTMENT OF WATER RESOURCES

DWR is responsible for the preparation of the California Water Plan, management of the State Water Project (SWP), protection and restoration of the Sacramento–San Joaquin River Delta (Delta), regulation of dams, provision of flood protection, and other functions related to surface water and groundwater resources. These other functions include helping water agencies prepare their UWMPs and reviewing such plans to ensure that they comply with the related Urban Water Management Planning Act.

STATE WATER RESOURCES CONTROL BOARD

The SWRCB was established in 1967 to administer state water rights and water quality functions. The SWRCB and its nine regional water quality control boards (RWQCBs) administer water rights and enforce pollution control standards throughout the state. The SWRCB is responsible for the granting of water right permits and licenses through an appropriation process following public hearings and appropriate environmental review by applicants and responsible agencies. In granting water right permits and licenses, the SWRCB must consider all beneficial uses, including water for downstream human and environmental needs. In addition to granting the water right permits needed to operate new water supply projects, the SWRCB also issues water quality–related certifications to developers of water projects under Section 401 of the federal Clean Water Act.

CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

The Central Valley RWQCB is responsible for the preparation and implementation of basin water quality plans consistent with the federal Clean Water Act; the enforcement of these plans ensures that local water quality is protected. The RWQCB may become involved in water supply programs as a responsible agency with respect to project impacts on downstream beneficial uses. The city of Rancho Cordova is within the jurisdiction of the Central Valley RWQCB.

CALIFORNIA DEPARTMENT OF FISH AND GAME

The California Department of Fish and Game (DFG) is a responsible agency with respect to the review of water right applications and also is responsible for issuing lake and streambed alteration permits for new water supply projects, as appropriate. DFG works in coordination with federal and state agencies to mitigate the impacts of projects on fish and wildlife resources, and is responsible for enforcing the California Endangered Species Act. DFG often helps establish instream flows (minimum releases below a dam or diversion structure) to maintain habitat below a project. Such release schedules may be included in water right permits and could affect the yield of a project.

3.2.3 LOCAL AGENCIES

SACRAMENTO COUNTY WATER AGENCY

Sacramento County Water Agency (SCWA) was formed in 1952 by a special legislative act of the State of California, the Sacramento County Water Agency Act (Agency Act). SCWA's purposes include, but are not limited to:

- making water available for any beneficial use of lands and inhabitants, and
- producing, storing, transmitting, and distributing groundwater.

SCWA's boundaries include all of Sacramento County and the agency is governed by a Board of Directors (ex officio, the County Board of Supervisors). Under the Agency Act, the County Board of Supervisors may contract with the federal government under reclamation laws with the same powers as irrigation districts, and with federal and state governments with respect to the purchase, sale, and acquisition of water. SCWA may also construct and operate any required capital facilities. There are currently several benefit zones within SCWA that are related to water supply (Zone 13, Zone 40, Zone 41, and Zone 50). Each has a unique purpose and generates revenue internally for carrying out that purpose. Zones relevant to Rancho Cordova are described below.

Sacramento County Water Agency Zone 40

Portions of the city of Rancho Cordova are located within SCWA Zone 40. Zone 40 was created in May 1985 by SCWA Resolution No. 663, which describes the boundaries of the zone and defines the projects to be undertaken

as "... the acquisition, construction, maintenance and operation of facilities for the production, conservation, transmittal, distribution and sale of ground or surface water or both for the present and future beneficial use of the lands or inhabitants within the zone." The boundaries and scope of Zone 40 activities were expanded in April 1999 by Resolution WA-2331. Zone 40 activities now include the use of recycled water in addition to surface water and groundwater. Once Zone 40 water facilities have been constructed, the facilities are granted to Zone 41, the public water purveyor (discussed below), for long-term operations and maintenance and eventual replacement.

Zone 40 is located in the central portion of Sacramento County (Exhibit 2). Much of Zone 40 currently consists of rural land uses (i.e., agricultural, agricultural/residential, and conservation reserve); however, rapid urbanization is occurring within the city of Elk Grove in the East Franklin and Laguna Ridge areas, in the unincorporated areas of the Vineyard and Mather service areas, and in the city of Rancho Cordova within the Sunrise Douglas and Sunrise Corridor service areas. Zone 40 generates revenue for its capital program through development fees and from special development capital fees collected bimonthly from Zone 41 retail water service customers within Zone 40 and wholesale water service customers in the Elk Grove Water Service area (Exhibit 3).

SACRAMENTO COUNTY LOCAL AGENCY FORMATION COMMISSION

The County Local Agency Formation Commission (LAFCo) regulates local-agency boundary changes, including annexations and changes to spheres of influence for each city and special district within the county. The LAFCo is also responsible for approving the boundaries and spheres of influence of each water purveyor in the county. Groundwater is the primary source of water for land not currently served by a water district. Lands currently not served by a water district must be annexed to the appropriate district prior to receiving municipal and industrial water supplies subject to approval by the LAFCo. Annexations to SCWA are not subject to LAFCo.

SACRAMENTO COUNTY ENVIRONMENTAL MANAGEMENT DEPARTMENT

The County Environmental Management Department performs a number of public-health services related to water supply, including prescribing the authorized use of recycled water, inspecting industrial and commercial stormwater systems, inspecting public/private water systems, controlling cross connection water systems, inspecting septic systems, installing groundwater monitoring wells, and conducting land use evaluations with respect to water and wastewater demands. The department is also responsible for enforcing the County's Well Standards Ordinance, which helps protect groundwater quality and public health by, among other things, including certain requirements related to monitoring wells and other protective measures.

FREEPORT REGIONAL WATER AUTHORITY

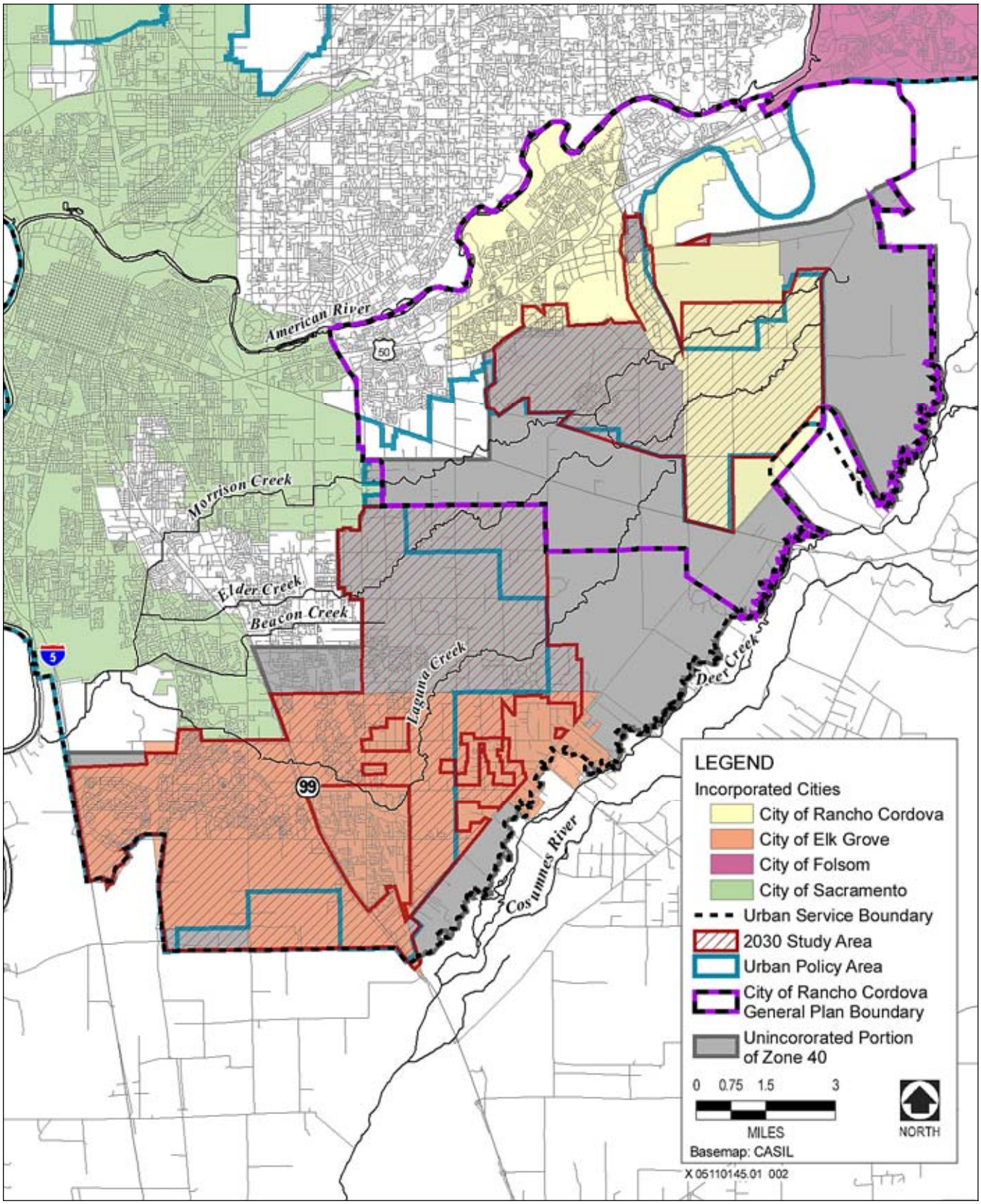
The Freeport Regional Water Authority (FRWA) was created in February 2002 by a Joint Powers Agreement of SCWA and East Bay Municipal Utility District in association with the City of Sacramento and with support from Reclamation. FRWA guides the financing, ownership, development, construction, and operation of the Freeport Regional Water Project, which is a joint effort to draw water from the Sacramento River near the town of Freeport, discussed below in Section 3.3.2.

3.2.4 WATER PURVEYORS WITHIN THE PLANNING AREA

Multiple water purveyors fall within the City's General Plan planning area. Water purveyors in the planning area are SCWA Zone 41, Golden State Water Company (GSWC), and California-American Water Company (Cal-Am). Exhibit 34 shows the water purveyors within the General Plan planning area.

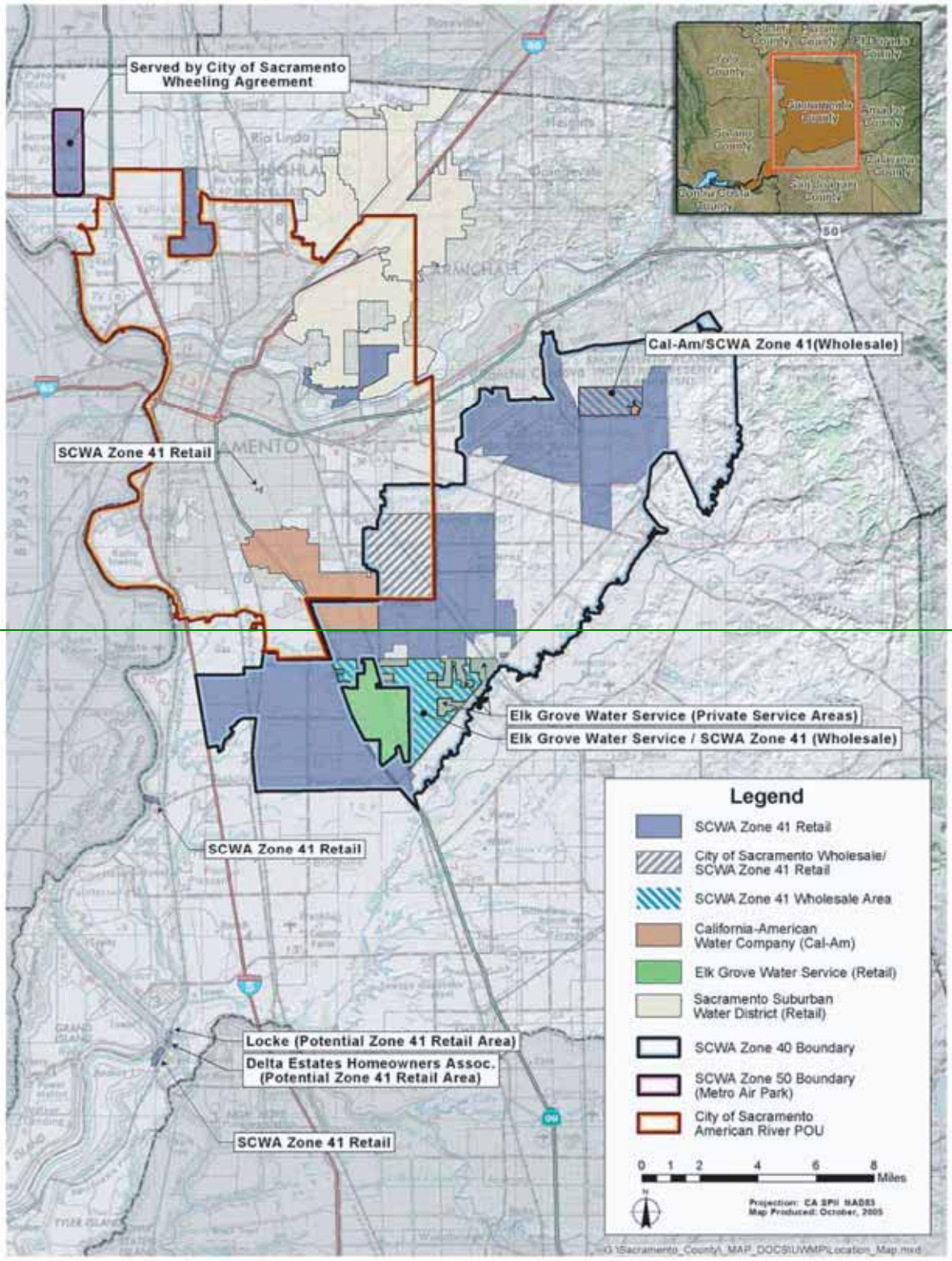
SACRAMENTO COUNTY WATER AGENCY ZONE 41

SCWA Zone 41 is a retail water supplier that provides safe and reliable drinking water to its various service areas located in both the unincorporated and incorporated (i.e., the Cities of Elk Grove and Rancho Cordova) portions



Source: County of Sacramento 1999, 2003; MWH 2003; U.S. Census Bureau 2002, cited in SCWA 2003

Incorporated Cities within SCWA Zone 40, and the Zone 40 2030 Study Area **Exhibit 2**



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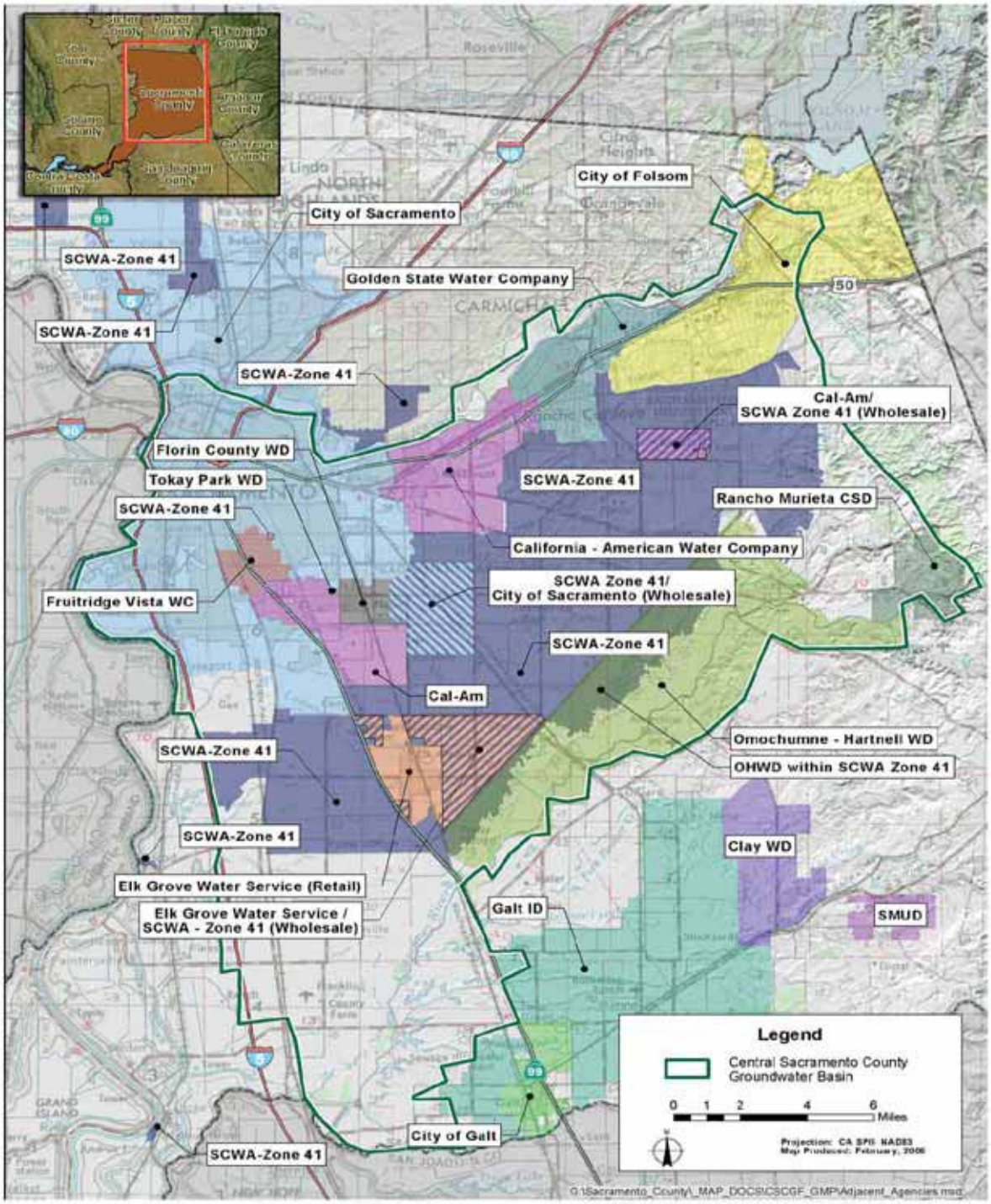
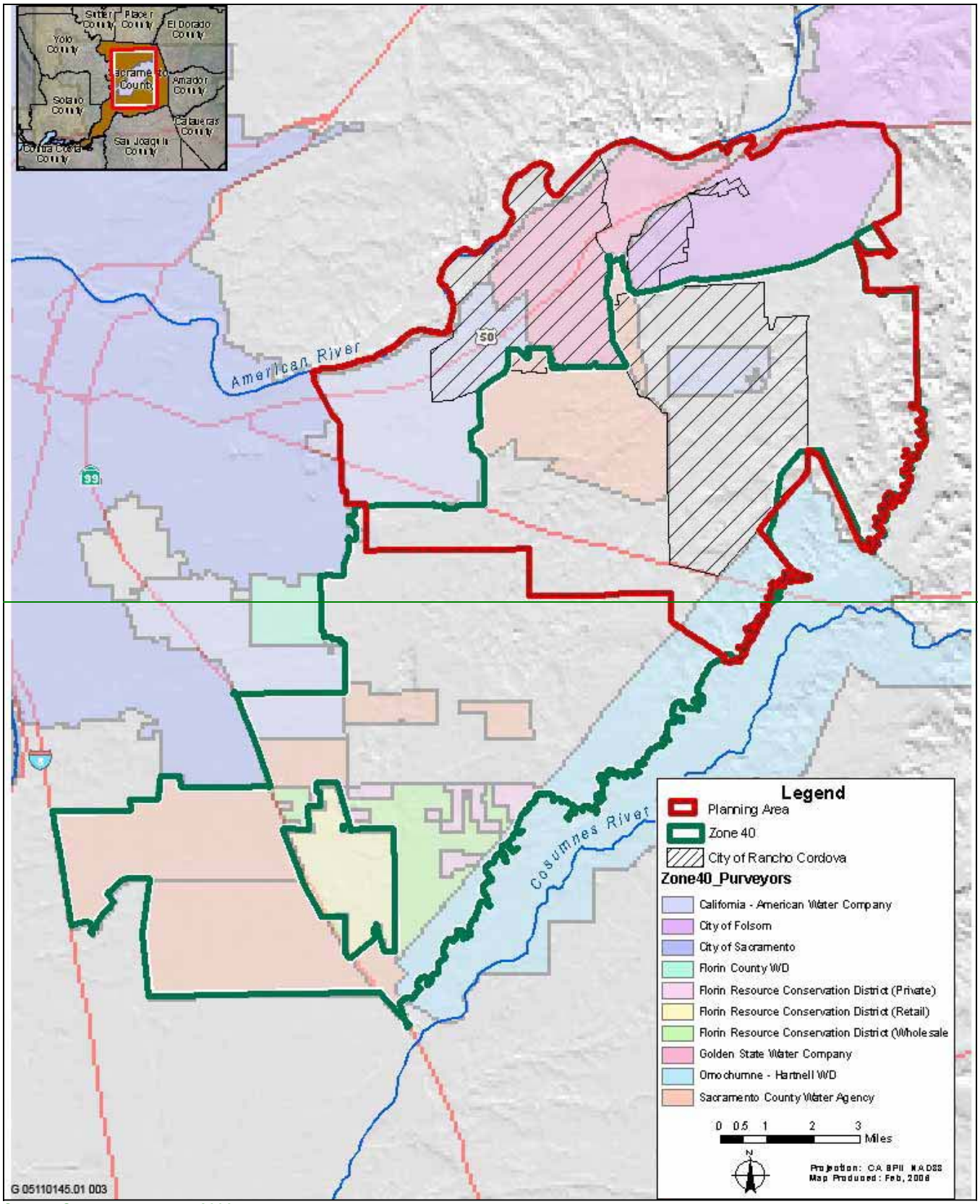


Source: SCWA 2005a

Service Areas for Retail Water Purveyors **Exhibit 3**



Source: Goetz, pers. comm. 2006

Water Purveyors within City of Rancho Cordova General Plan Planning Area **Exhibit 4**

of the county. Service areas include a portion of Walnut Grove, as well as Hood, Arden Park Vista, Northgate, the Southwest Tract, Zone 50, and Zone 40 (Exhibit 34). Zone 41 is responsible for the operation and maintenance of all the water supply facilities within these service areas. Revenues are collected by utility charges, connection permit fees, construction water permits, and grants, and collect monies to fund the design and construction; and operation, maintenance, and administration of water supply facilities. Water may come from wholesale water purveyors such as the City of Sacramento or American States Water Company or may be developed using facilities owned by Zone 41 (e.g., groundwater wells). Zone 41 retails and wholesales water to its defined service areas and to agencies with which agreements are in place to purchase water from SCWA.

Because SCWA plans for facilities within its service area through Zone 40 (e.g., *Zone 40 Water Supply Master Plan*) and Zone 41 is a retail water purveyor of Zone 40, the discussion that follows in this report will in most cases refer to Zone 40; however, for purposes of this analysis Zone 40 and 41 are interchangeable within the context of water supply planning for Rancho Cordova.

GOLDEN STATE WATER COMPANY

GSWC (formerly known as Southern California Water Company) owns and operates the Cordova System, a water treatment and conveyance system that serves GSWC's service area. GSWC is an investor-owned public utility company regulated by the California Public Utilities Commission. GSWC serves a portion of the city of Rancho Cordova and the unincorporated community of Gold River through its Cordova System (Exhibit 34). The service area for GSWC is bounded by Sunrise Boulevard (in the southern half of the service area) and Hazel Avenue (in the northern half) to the east, the former Mather Air Force Base to the south, Mather Field Road to the west, and the American River and the Gold River community to the north. The service area is characterized primarily by residential land uses, with some limited commercial and industrial land uses.

CALIFORNIA AMERICAN WATER COMPANY

Cal-Am is a privately owned water purveyor that provides urban water supply to portions of South Sacramento, North Highlands, Arden-Arcade, Rancho Cordova, Elverta, Citrus Heights, Antelope, the Security Park, and Walnut Grove. Cal-Am purchases wholesale water from SCWA Zone 40 and delivers water to portions of Rancho Cordova for urban use. Cal-Am's service area is shown in Exhibit 34.

3.3 RELATED PLANS, PROJECTS, AND AGREEMENTS

3.3.1 WATER FORUM AGREEMENT

The Water Forum Agreement (WFA) (Sacramento City-County Office of Metropolitan Water Planning 2000) is a plan that provides for the effective long-term management of the Sacramento region's water resources. The WFA was developed by a diverse group of stakeholders known as the Water Forum, which consisted of water agencies, business groups, agricultural interests, environmentalists, citizen groups, and local governments. SCWA is a signatory to the WFA. The WFA was formulated based on the two coequal objectives of the Water Forum: (1) Provide a reliable and safe water supply for the region's economic health and planned development through the year 2030; and (2) preserve the fishery, wildlife, recreational, and aesthetic values of the Lower American River.

To achieve the Water Forum's objectives, a comprehensive package of linked actions was developed to make more water available for consumption while protecting the natural resources of the Lower American River from environmental damage. The plan requires support and participation by each of the Water Forum stakeholders. The WFA includes seven elements:

I. Increased Surface Water Diversions

II. Actions to Meet Customer's Needs while Reducing Diversion Impacts on the Lower American River in Drier Years

III. Support for an Improved Pattern of Fishery Flow Releases from Folsom Reservoir

IV. Lower American River Habitat Management Element

V. Water Conservation

VI. Groundwater Management

VII. Water Forum Successor Effort

The WFA is a comprehensive document that describes how the Sacramento region will meet its water needs through implementation of the above seven elements and how the region will address key issues such as groundwater management, water diversions, dry-year water supply, water conservation, and protection of the Lower American River. The WFA also includes important provisions assuring each signatory that it will receive specific benefits as it fulfills its responsibilities, and that other signatories will also be honoring their commitments.

The WFA includes purveyor-specific agreements that define the benefits each water purveyor receives as a stakeholder and the actions each must take to receive these benefits. These assurances are supplemented by specific actions, such as contracts, joint power authorities, and water right actions. The Water Forum Successor Effort was created to implement the provisions contained in the WFA, maintain stakeholder relationships, provide an early-warning system for potential problems, and resolve issues that might arise.

The WFA includes definitions of the long-term average annual production yield (defined as the "sustainable yield") for each of the three subbasin of the groundwater basin in Sacramento County: 131,000 acre-feet (af) for the North Area (north of the American River); 273,000 af for the Central Area (between the American and Cosumnes Rivers); and 115,000 af for the South Area (south of the Cosumnes River). ~~Any proposed project must recognize the groundwater sustainable yield of the WFA. The proposed project is located within the Central Area groundwater subbasin (referred to in this document as the "Central Basin").~~

Water conservation and demand management are essential to meeting the objectives of the WFA. Conservation will reduce the volume of groundwater and surface water (including water from the American River) that is needed for future growth. As a signatory to the WFA and as a Central Valley Project (CVP) water contractor with the U.S. Bureau of Reclamation (Reclamation), SCWA is committed to implementing the Water Conservation Best Management Practices (BMPs) defined in the Water Conservation Element of the WFA. Technical studies prepared in support of the WFA indicate that implementation of the BMPs will result in a demand reduction factor of 25.6%, relative to the baseline 1990 demand, by the year 2030.

The 1999 Water Forum Agreement EIR evaluated SCWA's water supply needs in combination with the region's other water supply needs. As an outcome of the process, SCWA agreed to a series of actions and commitments related to surface-water diversions, dry-year supply, fishery flows, habitat management, water conservation, and groundwater management. Based on SCWA's agreement to adhere to the WFA, the EIR evaluated areas of development that could be served by future water supplies.

~~Initiated in 1993, the Water Forum process brought together a diverse group of stakeholders that included business and agricultural leaders, citizens' groups, environmentalists, water managers, and local governments to evaluate available water resources and the future water needs of the Sacramento metropolitan area. These stakeholders identified two coequal objectives to guide the development of the Water Forum Agreement (WFA):~~

- ~~Provide a reliable and safe water supply for the region's economic health and planned development through the year 2030.~~

- ~~Preserve the fishery, wildlife, recreational, and aesthetic values of the lower American River.~~

~~After a 6-year consensus-based stakeholder process, the WFA was completed. The WFA prescribes a regional conjunctive-use water program for the lower American River and the connected groundwater basin. The Water Forum also completed an environmental impact report (EIR) for the Water Forum Proposal. This document was certified by the two lead agencies (the City of Sacramento and the County) in December 1999. Please note that the WFA was formerly named the Water Forum Proposal. At the time that the City and County of Sacramento adopted the project and they and other stakeholders adopted their purveyor specific agreements (PSAs), the name was changed to the WFA because it was an agreed-to proposal by all stakeholders.~~

~~The WFA includes PSAs that define the benefits each water purveyor will receive as a stakeholder and the actions each must take to receive these benefits. PSAs for the County of Sacramento/SCWA, the City of Sacramento, and Sacramento Municipal Utility District (SMUD) also describe commitments by these entities to address issues related to wheeling and wholesaling of surface water, CVP water transfers, and dry-year water supply in SCWA Zone 40.~~

~~The Water Forum process initiated a coordinated effort for regional water supply planning within the Sacramento region. Because of limited water supplies, the sensitive ecological values of the lower American River, and existing groundwater contamination within the Sacramento groundwater basins, purveyors and stakeholders came together and agreed to resolve longstanding conflicts through an interest-based negotiation process that led to formulation of the seven elements of the WFA and individual PSAs for each purveyor. In addition, all signatories to the WFA became members of the Water Forum successor effort, which is responsible for overseeing, monitoring, and reporting on the implementation of the WFA.~~

~~The WFA is a long-term water supply plan that addresses water supplies and demands to 2030 for existing (as of January 2000) purveyors and agencies. The WFA did not address water supplies beyond 2030 and did not account for new incorporations for the cities of Elk Grove and Rancho Cordova. Rather, the WFA analysis was based on existing land use plans that were available at the time it was prepared (i.e., the *County of Sacramento General Plan* [1994] and other relevant agency general plans). Since the WFA was adopted in 2000, the cities of Elk Grove and Rancho Cordova have incorporated and pursued development and implementation of long-term land use plans. In the case of Rancho Cordova, buildout of its planning area would continue well beyond 2030. The City is not a water supply purveyor and must rely on the services of SCWA, GSWC, and Cal-Am to meet its growing demand. For demands that exceed those accounted for and evaluated in the WFA and EIR, the City may need to consult with regional water purveyors and stakeholders to the WFA (e.g., environmental and business interests) to determine how its proposed water demands fit within the overall regional water supply planning context.~~

3.3.2 SCWA Zone 40 Water Supply Master Plan

In response to the requirements of the WFA, SCWA undertook a comprehensive water supply planning process through the *Sacramento County Water Agency Zone 40 Water Supply Master Plan* (SCWA 2005a) to identify available water and the infrastructure necessary to deliver water to a subarea within Zone 40 known as the 2030 Study Area. The 2030 Study Area encompasses approximately 46,600 acres (including portions of the cities of Elk Grove and Rancho Cordova) (Exhibit 2) where development of industrial, commercial, office, and residential land uses is expected to occur and where demand for water is expected to be concentrated during the planning horizon of the WSMP (i.e., 2030).

As a signatory to the WFA, SCWA would ensure that water conservation and demand management—necessary steps to achieve WFA objectives—are integrated into future growth and water planning activities in its service

area. In planning the future use of SCWA's water supply, a land area that could be served was identified based on growth areas identified in the *County of Sacramento General Plan*. This area is known as the 2030 Study Area (Exhibit 2).

The Zone 40 WSMP provides a flexible plan of water management options that can be implemented and modified if conditions that affect the availability and feasibility of water supply sources change in the future. The goal of the Zone 40 WSMP is to define a conjunctive-use program of groundwater, surface water, remediated water, and recycled water supplies and a financing program for the construction of a new surface-water diversion structure; surface-water treatment plant; water conveyance pipelines; and groundwater extraction, treatment, and distribution facilities. The Zone 40 WSMP evaluates several options for facilities to deliver surface water and groundwater to development within Zone 40, as well as the financing mechanisms to provide water to the 2030 Study Area.

In planning for future growth and development within Zone 40, SCWA acknowledges that it is not a land use agency and is not responsible for approving growth and development within its service area, and identified the County of Sacramento (County), the City of Rancho Cordova, and the City of Elk Grove as the lead agencies responsible for such decisions. During development of the Zone 40 WSMP, the general plans for the newly incorporated cities of Elk Grove and Rancho Cordova were not available; therefore, the *County of Sacramento General Plan* (County of Sacramento 1993) was the planning document used to project growth and development anticipated to occur within an area defined as the Urban Policy Area (UPA). The County's UPA is defined as the area anticipated to build out with urban development within the planning horizon of the general plan (year 2024) (Exhibit 2).

The southern boundary of the 2030 Study Area generally coincides with the County's UPA. The 2030 Study Area was delineated based on the County's identified growth areas and the area of land that was planned to be served by the negotiated firm water supply identified in the WFA. The 2030 Study Area includes approximately 46,600 acres, about 8,400 more acres than the land remaining within the UPA in Zone 40. Because of the time frame of the Zone 40 WSMP and the likelihood that the UPA would be expanded in the next general plan update cycle (currently under way), SCWA identified four likely areas outside the UPA where urban expansion was logical and could occur; however, it acknowledged that decisions for growth and development would lie with the County Board of Supervisors or the governing bodies of other local jurisdictions. The areas included in the 2030 Study Area were selected based on their adjacency to the UPA. The 2030 Study Area also captured active projects and included the newly incorporated City of Rancho Cordova.

Since approval of the Zone 40 WSMP (SCWA 2005a), SCWA has pursued and is in various stages of planning several projects that would implement specific elements of the WSMP. These projects include:

- **Zone 40 Vineyard Water Treatment Plant.** SCWA is proposing to construct the Vineyard Water Treatment Plant (Vineyard WTP) and associated water supply facilities to provide up to 100 million gallons of potable water to existing and approved future development within the SCWA Zone 40 area. The Vineyard WTP is located west of the intersection of Florin and Excelsior Roads, at the northeast corner of Florin and Knox Roads in Sacramento County. The objective of constructing the Vineyard WTP is to provide capacity for treating 100 million gallons per day (mgd) of raw surface water and remediated groundwater, and to serve approved land uses in the Zone 40 service area. Initial phases of facility construction are anticipated to be completed by 2010, with full buildout by 2029.

- **Freeport Regional Water Project.** SCWA and East Bay Municipal Utility District are constructing a diversion structure on the Sacramento River near the community of Freeport and a raw-water conveyance pipeline from the diversion structure to the central portion of Zone 40. SCWA will construct a 100-mgd surface-water treatment facility in the central portion of Zone 40 (Vineyard WTP described above), and the associated treated-water conveyance pipelines to deliver water to SCWA customers. This project is anticipated to be completed by 2010.

~~In response to the requirements of the WFA, SCWA has undertaken a comprehensive water supply planning process through its *Zone 40 Water Supply Master Plan* (WSMP) (SCWA 2005a) to identify available water supplies, the land area that could be served by these supplies, and necessary infrastructure to deliver water to a subarea within Zone 40 known as the 2030 Study Area. The 2030 Study Area encompasses approximately 46,600 acres (including portions of the cities of Elk Grove and Rancho Cordova) (Exhibit 2) where development of industrial, commercial, office, and residential land uses is expected to occur and where demand for water is expected to be concentrated during the planning horizon of the WSMP (i.e., 2030).~~

~~As a signatory to the WFA, SCWA would ensure that water conservation and demand management—necessary steps to achieve WFA objectives—are integrated into future growth and water planning activities in its service area. SCWA identified a total acreage of land that could be served by existing and projected future water supplies and achieve the objectives of the WFA.~~

~~The Zone 40 WSMP provides a flexible plan of water management options that can be implemented and modified if conditions that affect the availability and feasibility of water supply sources change in the future. The goal of the Zone 40 WSMP is to define a conjunctive-use program of groundwater, surface water, remediated water, and recycled water supplies and a financing program for the construction of a new surface-water diversion structure, surface-water treatment plant, water conveyance pipelines, and groundwater extraction, treatment, and distribution facilities. The Zone 40 WSMP evaluates several options for facilities to deliver surface water and groundwater to development within Zone 40, as well as the financing mechanisms to provide water to the 2030 Study Area.~~

~~Since approval of the Zone 40 WSMP (2005), SCWA has pursued and is in various stages of planning for several projects that would implement specific elements of the WSMP. These projects include:~~

- ~~**Zone 40 Central WaterVineyard Water Treatment Plant.** SCWA plans to construct the 78-acre Central WaterVineyard Water Treatment Plant (CWTPVineyard WTP) and associated water supply facilities to provide up to 85 million gallons per day (mgd) of potable water to existing and approved urban development within the SCWA Zone 40 area. The CWTPVineyard WTP site is located at the northeast corner of Florin and Knox Roads, west of the Florin Road/Excelsior Road intersection in Sacramento County. An associated SCWA corporation yard to house facilities and store equipment would be colocated on the site, along with a groundwater treatment facility. The CWTPVineyard WTP would have the capacity to treat 85 mgd of raw surface water and 13 mgd of raw groundwater to serve approved land uses in the Zone 40 service area. Initial phases of facility construction are anticipated to be completed by 2010 with full buildout by 2019.~~

- ~~**Freeport Regional Water Project (FRWP).** SCWA and East Bay Municipal Utility District are constructing a diversion structure on the Sacramento River near the community of Freeport and a raw-water conveyance pipeline from the diversion structure to the central portion of Zone 40. SCWA is would construct a 85-mgd surface-water treatment facility in the central portion of Zone 40 (CWTPVineyard WTP and described above), and the associated treated-water conveyance pipelines to deliver water to SCWA customers. This project is anticipated to be completed by 2010.~~

- **North Vineyard Well Field (formerly Excelsior Road Well Field) Project**. This well field would provide for the extraction of up to 10,000 afy of groundwater for replacement and/or new water supplies to serve existing or proposed development within Zone 40. Ultimately it would consist of up to eight wells located near Excelsior Road and Florin Road with a 30-inch raw-water pipeline to convey water to ~~a new water treatment plant~~the Anatolia Water Treatment Plant. The first phase consists of three wells (4,500 gallons per minute [gpm]) and ~~would~~ will be expanded as new development or replacement supplies are needed. If wells within SCWA's Mather/Sunrise system (in the south-west portion of the City's planning area) are shut down because of past groundwater contamination, any additional capacity remaining in the well field can be claimed as a replacement supply (as opposed to a new water supply) by SCWA. ~~This project is currently~~

being constructed, with tThe initial phase estimated to be complete at the end of 2006of the project is operational. The project is expected to be built out by 2011.

- **Eastern County Replacement Water Supply Project.** The Eastern County Replacement Water Supply Project (RWSP) is a proposal by SCWA to use remediated groundwater obtained through the agreements between the County, SCWA, GenCorp, and McDonnell Douglas Corporation/Boeing for replacement of water lost as a result of past activities resulting in groundwater contamination in the Rancho Cordova area, for new development on Aerojet lands, and for environmental enhancement. SCWA has initiated environmental review of this project, which evaluates several discharge, diversion, and treatment options for using remediated groundwater from GenCorp and McDonnell Douglas Corporation/Boeing groundwater extraction and treatment (GET) facilities. The RWSP would identify the necessary facilities and timing of delivery of remediated water. Environmental review is anticipated to be completed by late summer 2006, with construction of all project-related facilities completed by 2010.

- This project is a proposal by SCWA to use remediated groundwater supplies obtained through the agreements between the County, SCWA, Aerojet, and McDonnell Douglas Corporation for replacement water lost as a result of past groundwater contamination in the Sunrise corridor area. The remediated groundwater would replace lost groundwater supplies of Cal-Am or GSWC or would be used to serve new urban development on lands known as Aerojet lands in the northern portion of Zone 40 and for enhanced fishery flows along the Cosumnes River. This project currently is under environmental review and facilities included within this project are anticipated to be constructed by 2010.

It is important to note that during development of the Zone 40 WSMP, the general plans for the newly incorporated cities of Elk Grove and Rancho Cordova were not available; therefore, the County General Plan (1993) was the planning document used to project growth and development anticipated to occur within an area defined as the Urban Policy Area (UPA). The County's UPA is defined as the area anticipated to be built out with urban development within the planning horizon of the general plan (year 2024). Since development of the Zone 40 WSMP, the City has initiated a general plan process and has developed a proposed land use map for future growth and development within its jurisdiction. Exhibit 2 identifies the County's UPA and, the Zone 40 boundary; Exhibit 1 shows, and the City's planning area. Comparison of the boundaries shows that about 70% of the City's planning area falls within Zone 40.

3.3.3 AGREEMENTS BETWEEN SACRAMENTO COUNTY, SCWA, AEROJET, AND BOEING

The framework for addressing water supply issues associated with the contamination of the local groundwater supply from historical uses of the GenCorp site is provided in the agreements between Sacramento County, SCWA, and GenCorp (August 27, 2003) and between the County, SWCA, and McDonnell Douglas/Boeing (August 29, 2003). Under directives from the U.S. Environmental Protection Agency (EPA), the Central Valley Regional Water Quality Control Board (RWQCB), and the California Department of Toxic Substances Control, both GenCorp and McDonnell Douglas Corporation/Boeing are required to pump groundwater that has been contaminated by chemicals associated with past activities at their sites; remove those chemicals by various treatment processes (remediation); and discharge the remediated water to surface water bodies/surface streams. The agreements prescribe the capture of remediated groundwater for beneficial use.

Pursuant to the agreements, all rights, title, and interest in the remediated groundwater was granted to SCWA, which would capture the remediated water and provide additional treatment as needed for beneficial urban and environmental use. The agreements specify that the highest priority beneficial use of remediated water is for the replacement of groundwater capacity lost by water purveyors in the Rancho Cordova area. This includes groundwater capacity lost by local water purveyors Golden State Water Company (GSWC) and California American Water Company (Cal-Am). The next highest priority beneficial use of remediated water is for the supply of potable water to proposed development on Aerojet lands, which includes the Rio del Oro and

Westborough projects. The remaining priority use includes other development and environmental enhancement. The remediated groundwater would be made available as part of SCWA's proposed RWSP described above.

~~The framework for addressing water supply issues associated with the contamination of the local groundwater supply from historical uses of the Aerojet site (a portion of which is now referred to as the Rio del Oro project site, located within the City's planning area) is provided in the agreements between Sacramento County, SCWA, and Aerojet (August 27, 2003) and between the County, SWCA, and Boeing (August 29, 2003). Under directives from the U.S. Environmental Protection Agency (EPA) and the SWRCB, both Aerojet and Boeing are required to pump groundwater that has been contaminated by chemicals associated with past activities at their sites; remove those chemicals by various treatment processes (remediation); and discharge the remediated water to surface water bodies/surface streams. The agreements prescribe the capture of remediated groundwater for beneficial use.~~

~~Pursuant to the agreements, right of use of remediated groundwater was granted to SCWA, which would capture the remediated water and provide additional treatment as needed for beneficial urban and environmental use. The agreements specify that the highest priority beneficial use of remediated water is for the replacement of groundwater capacity lost by water purveyors in the Sunrise corridor area. This includes groundwater capacity lost by GSWC and Cal-Am. Details of the GSWC agreement are discussed below. The next highest priority beneficial use of remediated water is for the supply of public water to proposed development of the Aerojet property, which includes the Rio del Oro and Westborough projects (see Section 5.2, "Planning Area Water Demands"). The remaining priority use is the enhancement of fishery flows along the Cosumnes River though conveyance of remediated water to the Folsom South Canal and discharge to the Cosumnes River. The remediated groundwater would be treated and delivered as part of SCWA's proposed Eastern County Replacement Water Supply Project described in Section 3.3.2, "SCWA Zone 40 Water Supply Master Plan."~~

3.3.4 WATER SUPPLY DELIVERY AGREEMENT BETWEEN AMERICAN STATES WATER COMPANY, SACRAMENTO COUNTY, AND SCWA

The water supply delivery agreement between American States Water Company (known in California as Golden State Water Co., GSWC), the County, and SCWA assists with the implementation of the settlement agreements entered into by the County with Aerojet (i.e., Aerojet) and Boeing (described in Section 3.3.3, "Agreements between Sacramento County, SCWA, Aerojet, and Boeing," above) by establishing the terms and conditions under which the County would be responsible for providing replacement groundwater to GSWC. The agreement provides a negotiated solution to sharing the groundwater resources in this portion of Sacramento County and requires the County to make replacement water available to GSWC consistent with an allocation plan that would be developed between the County and GSWC. The County would provide 5,000 afy of replacement water supplies from Aerojet/Boeing groundwater, extraction, and treatment (GET) facilities via discharge to the American River system and conveyed within the Folsom South Canal to GSWC's intake facilities. Replacement water supplies in addition to the 5,000 afy at the Folsom South Canal intake would be negotiated in an annual meet-and-confer session, but under no circumstances would the water volumes supplied by the County exceed the lesser of maximum GET pumping volumes or 15,200 afy. Based on GSWC current UWMP, discussed in Section 4.2, "Golden State Water Company (Cordova System)," GSWC has planned for the use of up to 6,329 afy from SCWA facilities in addition to the 5,000 afy from the Folsom South Canal (11,329 afy total replacement water supplies). The County would be responsible for construction and operation of facilities necessary to deliver the remaining replacement water to GSWC at the delivery points identified in the agreement. The County's obligation to provide replacement water to GSWC is also limited to an appropriate share of the total amount of remediated water conveyed by Aerojet and Boeing to the County. The County's obligation to furnish GSWC with replacement water further depends on the completion and certification of the environmental documentation necessary to construct the facilities required to deliver the replacement water to GSWC, and the County's ability to obtain any required regulatory approvals/permits. The facilities referred to in the agreement to treat and deliver the remediated groundwater are part of SCWA's proposed ~~Eastern County Replacement Water Supply Project~~RWSP described in Section 3.3.2, "SCWA Zone 40 Water Supply Master Plan."

3.3.5 URBAN WATER MANAGEMENT PLANS FOR MUNICIPAL WATER PURVEYORS

The following 2005 UWMPs have been adopted by municipal water purveyors within the City's planning area pursuant to the guidelines set forth by the Urban Water Management Act described in Section 3.1.1, "Urban Water Management Planning Act:"

- *SCWA Zone 41 Urban Water Management Plan*
- *GSWC Cordova System Urban Water Management Plan*
- *California American Water Company Northern Division Urban Water Management Plan*

A description of these UWMPs is provided in Section 4, "Existing and Projected Water Demand and Supply for Water Purveyors in the City's Planning Area," below.

3.3.6 SCWA GROUNDWATER MANAGEMENT PLAN

SCWA prepared a Groundwater Management Plan (GMP) for Zone 40 (SCWA 2004). While GMPs are typically prepared for entire groundwater basins (in this case the Central Groundwater Basin), SCWA's GMP addresses only the boundaries of Zone 40, which encompasses most but not all of the Central Sacramento County Groundwater Basin (Central Basin). The decision to limit the extent of this GMP to Zone 40 was intentional because deliberations and discussion are currently under way between interested stakeholders regarding future governance and management of a "groundwater authority" for the Central Basin. The Zone 40 GMP is intended to be a document that can grow into, and perhaps be superseded by, the GMP that would be needed for the entire Central Basin.

The purpose of the GMP is to maintain a sustainable, high-quality groundwater resource for the users of the groundwater basin underlying Zone 40. Development of the Central Basin GMP would be through the governance structure currently under negotiations by the Central Sacramento County Groundwater Forum (CSCGF) (discussed below).

3.3.7 CENTRAL SACRAMENTO COUNTY GROUNDWATER FORUM

Acting on behalf of the Water Forum successor effort, DWR initiated the CSCGF by signing a Memorandum of Understanding with the Sacramento City-County Office of Metropolitan Water Planning (funded by SCWA and the City of Sacramento) to support discussions among stakeholders representing all segments of the community with an interest in developing a groundwater management structure and ultimately a GMP for the Central Basin. Stakeholders are organized into six interest groups: agriculture, agriculture/residential, business, environmental/community organizations, local governments/public agencies, and water purveyors. Each interest group is represented by five individuals who participate in the collaborative process known as the CSCGF.

The CSCGF is developing a GMP, which is currently in draft form and being reviewed by local stakeholder groups. It is anticipated that the new GMP would be adopted within the next 6 months (by August 2006). This plan would supersede the Zone 40 GMP described above. Information contained in the draft GMP as it pertains to future water supply planning for water purveyors such as SCWA who pump groundwater from the Central Basin is summarized in Section 3.3.6, "SCWA Groundwater Management Plan," of this report.

3.4 WATER RESOURCES IN THE PROJECT AREA

3.4.1 SURFACE WATER RESOURCES

Major surface waters in the vicinity of the Rancho Cordova planning area include the American River, Folsom Reservoir, and Lake Natoma to the north; Sacramento River to the west; and the Cosumnes River to the southeast (Exhibit 2). Surface waters within or near the Zone 40 2030 Study Area include Deer Creek, which is tributary to and parallels the Cosumnes River on the north, and the Morrison Creek Stream Group (Morrison, Elder, Gerber,

Unionhouse, Florin, and Laguna Creeks), which generally flow in a southwesterly direction southeast of the planning area, in the southeastern portion of Sacramento County.

SACRAMENTO RIVER

The Sacramento River drainage basin upstream of Zone 40 encompasses approximately 23,500 square miles and produces an average annual runoff of about 17,000,000 acre-feet (AF) at the Freeport gauging station (below the confluence with the American River). Principal reservoirs on the mainstream and tributaries to the Sacramento River and controlling flows in the lower Sacramento River include Lake Shasta, Trinity Lake, Lake Oroville, and Folsom Reservoir. Based on the 30-year record of data for the period 1968–1998, which spans a variety of water year types, individual monthly average flows have ranged from a low of 4,500 cubic feet per second (cfs) in October 1978 to a maximum of 87,000 cfs in January 1997. The average monthly flow for the 30-year period ranges between 13,000 cfs and 40,600 cfs with the lowest flows occurring in October and peak flows in February.

AMERICAN RIVER, FOLSOM RESERVOIR, AND LAKE NATOMA

The American River drainage basin encompasses approximately 1,900 square miles. Folsom Reservoir is the principal reservoir in the basin with a storage capacity of 975,000 AF. Several smaller reservoirs upstream of Folsom Reservoir contribute an additional 820,000 AF of storage capacity. Nimbus Dam impounds Lake Natoma downstream of Folsom Dam and regulates releases from Folsom Reservoir to the lower American River. The entrance facilities to the Folsom South Canal are located along the south shore of Lake Natoma immediately upstream of Nimbus Dam. Mean annual flow in the lower American River is 3,300 cfs; the design capacity of the channel for flood flows is 115,000 cfs.

COSUMNES RIVER

The Cosumnes River watershed extends from its headwaters, at an elevation of approximately 7,500 feet on the western slope of the Sierra Nevada, to the confluence with the Mokelumne River, approximately 10 miles south of SCWA Zone 40. The Cosumnes River is the last major river on the western slope of the Sierra Nevada with no major dams. Minor dams on the river are used for recreational and agricultural irrigation purposes.

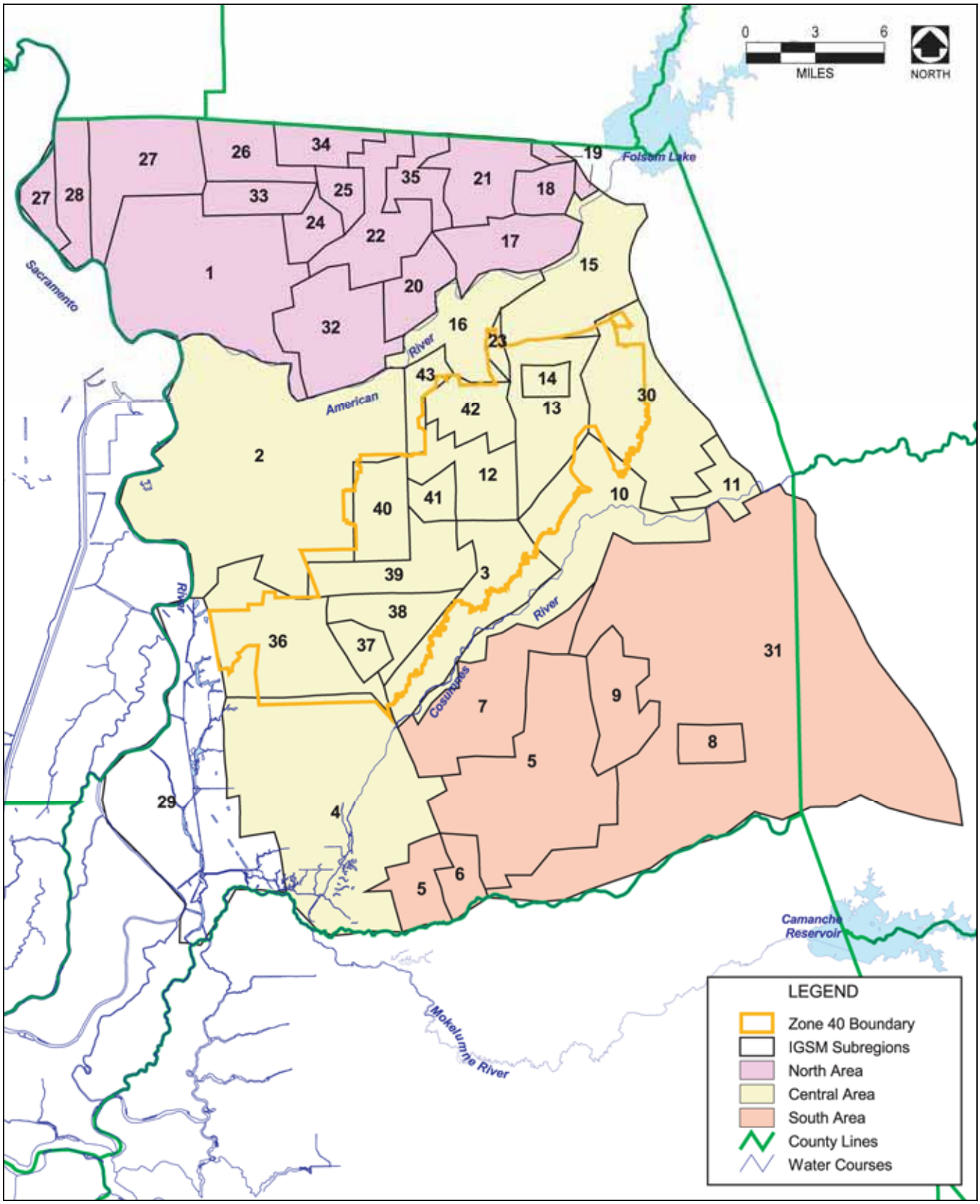
3.4.2 CENTRAL VALLEY PROJECT AND STATE WATER PROJECT

The CVP is a multipurpose project operated by Reclamation that stores and transfers water from the Sacramento, San Joaquin, and Trinity River basins to the Sacramento and San Joaquin Valleys. The SWP is operated by DWR and supplies water to approximately 30 member agencies throughout California.

3.4.3 GROUNDWATER RESOURCES

The Sacramento County groundwater system is part of the larger Sacramento Valley groundwater basin. Within Sacramento County three separate groundwater subbasins have been identified: North Area (the area north of the American River), Central Area (roughly the area between the American River and the Cosumnes River), and South Area (generally the area south of the Cosumnes River) (Exhibit 4~~5~~). Historical groundwater use in each subbasin has resulted in the development of three regional cones of depression (SCWA 2003). Each of the groundwater areas is described below. (DWR 2003.)

- **North Area.** The North Area groundwater subbasin corresponds to the portion of the North American Sub-Basin, as defined by DWR (DWR Basin Number 5-21.64), that is located within Sacramento County. Basin 5-21.64 extends north into Placer and Sutter Counties. The North Area is bounded on the west by the Sacramento River, on the north by the Sacramento–Placer/Sutter County line, and on the south by the American River.



Source: WRIME 2003
Note: Numbers represent subregions within the groundwater basin for the regional hydrologic groundwater–surface water model.

Groundwater Basins **Exhibit ~~5~~4**

- **Central Area.** The Central Area groundwater subbasin corresponds to the South American Sub-Basin (DWR Basin Number 5-21.65) and is located between the American River and the Cosumnes River. Zone 40 and the Rancho Cordova planning area are located within the Central Area.
- **South Area.** The South Area (Galt Area) groundwater subbasin corresponds to the portion of the DWR Cosumnes Sub-Basin (DWR Basin Number 5-22.16) that is located within Sacramento County. In the Sacramento County Integrated Groundwater–Surface Water Model the South Area is bounded on the north and west by the Cosumnes River, on the east by the boundary of the groundwater basin, and on the south by the Sacramento County line.

4 EXISTING AND PROJECTED WATER DEMAND AND SUPPLY FOR WATER PURVEYORS IN THE CITY'S PLANNING AREA

Developed and undeveloped areas within the City that are being planned for in the General Plan are served by the following water agencies/entities: SCWA, GSWC, and Cal-Am (Exhibit 34). The water supplies and demands of each are discussed in detail below. Water supplies for agricultural lands within the General Plan planning area are met with groundwater pumped by local wells from the Central Groundwater Basin (Central Basin). Lands that are currently undeveloped in the planning area are predominantly agriculture or grazing lands. As these lands are developed, the localized groundwater pumping would be discontinued and these areas would be served by one of the region's water purveyors through a combination of surface, groundwater, recycled, and remediated water supplies.

This section provides a summary of the different water supplies and the existing and projected water demands and supply conditions for each of the water purveyors within the City's planning area. Existing and projected water demands for each water purveyor within the City were obtained from the most recent UWMPs for each purveyor and supplemented with additional information obtained though a combination of adopted water supply master plans and communication with staff of the local water purveyors, as appropriate.

The total existing and projected water supplies and demands for water purveyors within the City's Planning Area are summarized in Table 1. The methodology used to calculate total water demands associated with the City's corporate limits and planning area demands is described in Section 5.1, "Methodology for Estimating Water Demands," below.

Table 1
Summary of Water Supply and Demand for Water Purveyors in the City of Rancho Cordova General Plan Planning Area

	Year	2010	2015	2020	2025	2030
SCWA Zone 40	Supply[1]					
	Surface Water	13,060	44,143	48,772	68,700	69,567
	Groundwater	34,125	28,837	40,470	31,324	39,097
	Recycled Water	4,400	4,400	4,400	4,400	4,400
	Total Supply	**51,585**	**77,380**	**93,642**	**104,424**	**113,064**
	Total Demands[1]	**51,585**	**77,380**	**93,642**	**104,424**	**113,064**
	Surplus/Deficit	**0**	**0**	**0**	**0**	**0**
Supply Allocated for SCWA Zone 40 North Service Area (NSA)—Within City's Planning Area (defined in Section 4.1.3)	***Supply***					***37,314[2]***
GSWC (all of GSWC's service area is within City's planning area)	Supply[3]					
	Surface Water	15,000	15,000	15,000	15,000	15,000
	Groundwater	9,518	10,499	10,814	10,829	10,829
	Total Supply	**24,518**	**25,499**	**25,814**	**25,829**	**25,829**
	Demands[2]	**19,518**	**20,499**	**20,814**	**20,829**	**20,829**
	Surplus/Deficit	**5,000**	**5,000**	**5,000**	**5,000**	**5,000**

Table 1 Summary of Water Supply and Demand for Water Purveyors in the City of Rancho Cordova General Plan Planning Area						
	Year	**2010**	**2015**	**2020**	**2025**	**2030**
Cal-Am	Supply[3]					
	Groundwater	43,600	33,650	34,180	33,550	33,910
	Wholesale Purchases	4,020	16,860	18,320	20,830	22,280
	Total Supply	**47,620**	**50,510**	**52,500**	**54,380**	**56,190**
	Demands[4]	**47,620**	**50,510**	**52,500**	**54,380**	**56,190**
	Surplus/Deficit	**0**	**0**	**0**	**0**	**0**
Supply Allocated for Cal-Am's Service Area within the City's Planning Area	***Supply***					***14,477***
City of Rancho Cordova General Plan Planning Area	Supply Available from Purveyors					**77,620[5]**
	Projected Demands					
	Corporate City Limits (2030)a					57,299
	Non-City Area[6]					71,410
	Total Demands					**128,709**
	Surplus/(Deficit)					**(51,089)**

Notes:
1. Data from SCWA Zone 41 UWMP, Table 5-1 and 5-2. Because SCWA would implement a conjunctive use water supply program, water supplies would never exceed projected demands because groundwater would be pumped and surface water would be used to meet, not exceed water demands. Supply and demand based on normal year type. (SWCA 2005b)
2. This supply is part of Zone 40's 2030 water supplies of 113,064 afy (SCWA 2005a).
3. Data from GSWC UWMP Table 3-1 and 4-9. Supply exceeds demand because GSWC does not plan to use 5,000 afy of its SMUD Water Transfer entitlement due to limited surface water treatment capacity and its desire to maintain its groundwater rights through the Aerojet Replacement Water operations. (GSWC 2005)
4. Data from Cal-Am UWMP. (Cal-Am 2006)
5. Sum of SCWA (37,314 afy), GSWC (25,829 afy), and Cal-Am's (14,477 afy) water supplies identified for the City's planning area.
6. Buildout for non-city area of Rancho Cordova projected to occur after 2030.

4.1 SACRAMENTO COUNTY WATER AGENCY ZONE 40

SCWA prepared an UWMP for Zone 41(SCWA's retail water purveyor for Zone 40) that addresses water supply and demand issues for the areas within Sacramento County where Zone 41 provides water services. The SCWA Zone 41 UWMP addresses delivering water not only to the Zone 40 area, but also to other areas outside of Zone 40, where Zone 41 has contracts to provide water (e.g., Zone 50, Sacramento Suburban Water District [SSWD], etc.) (Exhibit 3). Because SCWA's conjunctive use groundwater program would only be implemented within the Zone 40, the Zone 41 UWMP presents projected water supply and demand information separately for areas within Zone 40 and areas outside of Zone 40. However, the UWMP does not specifically describe how projected future water supplies would be allocated within the Zone 40 region (e.g., how water would be allocated to the City of Rancho Cordova).

To build upon its 2005 Zone 40 WSMP (described in Section 3.3.2, "SCWA Zone 40 Water Supply Master Plan."), SCWA is in the process of preparing a Water System Infrastructure Plan (WSIP) that addresses how

identified 2030 water supplies addressed in both the UWMP and the Zone 40 WSMP would be allocated among users within its service area. Because the Zone 40 2030 Study Area, where growth and development are expected to occur, includes portions of both Elk Grove and Rancho Cordova, the information being developed for the WSIP should help the City and SCWA to determine how much, if any, additional water supply and infrastructure would be needed to meet the anticipated growth and development in its planning area.

The analysis that follows summarizes information contained within the Zone 41 UWMP as it pertains to the Zone 40 region only and information from the draft WSIP (SCWA 2006) as it pertains to the North Service Area (NSA), which is the area within Zone 40 where a large portion of the City's planning area is located.

4.1.1 WATER SUPPLY SOURCES

The areas inside Zone 40 are served conjunctively with groundwater (pumped from the Central Basin), surface water, and recycled water. Surface water refers to water entitlements from the American and/or Sacramento Rivers. All surface water supplies require conventional treatment before distribution. Recycled water refers to wastewater treated to a tertiary (e.g., filtration and disinfection) level (Title 22, unrestricted use) at the Sacramento Regional Wastewater Treatment Plant and used for landscape irrigation.

Table 2 summarizes SCWA's Zone 40 current and planned water supplies for normal (e.g., normal years are years when rainfall and water supply represent the long-term average) water years. A description of these supplies follows the table.

Table 2
Average Annual Current and Planned Water Supplies for SCWA Zone 40 through 2030

Source	Water Supply (afy)
U.S. Bureau of Reclamation CVP Supply (SMUD 1, SMUD 2, and Fazio Water)	45,000
Appropriative Water Supplies [1]	14,586
Wholesale Water Agreement to serve the portion of Zone 40 that lies within the City of Sacramento's American River POU	9,300
Other Water Transfer Supplies[2]	5,200[2]
Zone 40 Groundwater[3]	40,900
Recycled Water (current use)[4]	4,400
Total Supplies	**114,186[5]**

Notes:
afy = acre-feet per year; CVP = Central Valley Project; GW = groundwater; POU = Place of Use; SMUD = Sacramento Municipal Utility District
1 This reflects the expected long term average yield and not the contract amount
2 This is an estimate of water that would be purchased only in dry and critically dry water years e.g. years when rainfall and hence water supplies are below and substantially below average and is not included in the total supply calculation.
3 Long-term annual average supply. Includes the use of replacement water.
4 A master plan by Sacramento Regional County Sanitation District is currently under way to evaluate the potential of expanding deliveries of recycled water.
5 Total water supplies identified in this table exceed those identified in Table 1 because Table 1 reflects a scenario whereby SCWA's conjunctive use program would ensure water supplies did not exceed the WSMP Zone 40 water demands of 113,064 afy. Table 2 shows average-annual supplies, whereby the average annual groundwater supply may not be reflective of the total amount that is pumped in a year to meet the actual demand, but rather the long-term average groundwater supply that is projected to be available.
Source: SCWA 2005b

ZONE 40 SURFACE WATER SUPPLIES

Appropriative Water Rights

SCWA has submitted an application to the SWRCB for the appropriation of water from the American and Sacramento Rivers (the County Board of Supervisors authorized submittal of this application on May 30, 1995). This water is considered "intermittent water" that typically would be available during the winter months of normal or wet years (e.g. years when rainfall and hence water supply are greater than average). This water could be used to meet system demands and possibly for future groundwater recharge through recharge percolating groundwater basins or direct injection of surface water into the aquifer. Based on water supply modeling (i.e., Calsim II) performed for the Zone 40 WSMP and the Freeport Regional Water Authority for the FRWP project, the maximum, minimum, and average annual use of appropriative water are projected to be 71,000 AF, 0 (acre-feet) AF, and 21,700 AF, respectively. In close to 30% of the years, 12,000 AF or less of appropriative water is projected to be used. The contract amount is based on the maximum water supply requirement of 71,000 afy.

Central Valley Project Supplies

SMUD 1 Assignment

Under the terms of a three-party agreement (SCWA, SMUD, and the City of Sacramento), and in accordance with SMUD's PSA, the City of Sacramento provides surface water to SMUD for use at two of SMUD's cogeneration facilities. (Because the cogeneration facilities are located within the City of Sacramento's American River Place of Use [POU], authorization for this CVP water assignment by the Bureau of Reclamation is not required.) SMUD, in turn, has assigned 15,000 afy of its CVP contract water to SCWA for municipal and industrial use. This CVP contract assignment is complete.

SMUD 2 Assignment

SMUD's PSA directs SMUD to assign a second 15,000 afy of surface water to SCWA for municipal and industrial uses and for SCWA to construct groundwater facilities necessary to provide water to meet SMUD's dry-year water shortage demand of up to 10,000 afy at its cogeneration facility. This CVP contract assignment is complete. SCWA and SMUD are continuing to negotiate the timing and exact amount of the dry-year shortage deliveries. Delivery of the dry-year shortage water supplies would be through the construction of additional groundwater facilities that would discharge into the Folsom South Canal.

Central Valley Project Water Public Law 101-514 ("Fazio" Water)

In April 1999, SCWA obtained a CVP water service contract pursuant to Public Law 101-514 (referred to as "Fazio water") that provides a permanent water supply of 22,000 afy with 15,000 afy allocated to SCWA and 7,000 afy allocated to the City of Folsom.

Based on modeling performed for the Zone 40 WSMP and the FRWP, the maximum, minimum, and average annual use of CVP (SMUD 1, SMUD 2, and Fazio) water were projected to be 45,000 AF, 8,700 AF, and 38,000 AF, respectively. The 45,000 AF maximum reflects the firm supply of CVP water in most years. Lesser amounts result from CVP deficiencies or cutbacks in dry years as per the terms of the municipal supply contract.

Other Supplies

SCWA would pursue purchase and transfer agreements with other entities that currently hold surface-water rights in the north Sacramento River basin. Estimated long-term average annual use of these water supplies would be approximately 5,200 AF. This water would be purchased only in dry and critically dry years. Because these supplies are not secured and the reliability of securing these supplies is not know, they are not included in the calculation of average annual supply.

City of Sacramento American River POU Water

SCWA would also enter into an agreement with the City of Sacramento whereby the City of Sacramento would sell surface water to SCWA for use in the portion of the 2030 Study Area that lies within the City of Sacramento's American River POU (Exhibit 3). The estimated long-term average annual volume of water that could be used within this POU would be approximately 9,300 AF. The maximum day capacity that would be purchased from the City is approximately 20 mgd.

SCWA GROUNDWATER SUPPLIES

Groundwater is a vital source of supply for Zone 40 and currently makes up a substantial portion of the supply inside of Zone 40. In 2004, groundwater accounted for 88% of total water supplies (SCWA 2005b). Over the long term, as Zone 40's use of surface water expands with new facilities, groundwater would be used to supplement surface water in a conjunctive use program that would lead to less reliance groundwater supplies in wet years and more reliance on these supplies in dry years. Over the long-term average, SCWA's extraction of groundwater would not exceed 40,900 afy. SCWA's source of groundwater supply comes from the Central Basin through a series of extraction wells and groundwater treatment plants, which is described in Section 3.4.3, "Groundwater Resources."

Groundwater Production

SCWA currently exercises and will continue to exercise its rights as a groundwater user and would extract water from the groundwater basin underlying Zone 40 for the beneficial use of its customers. As a signatory to the WFA, SCWA is committed to adhering to WFA-negotiated, long-term average sustainable yield of the Central groundwater basin (i.e., 273,000 afy). Projected future urban water demands within SCWA's 2030 Study Area would be approximately 113,000 afy (see Table 1) and would be met through a combination of surface water, groundwater, recycled water, and remediated water supplies (SCWA 2005b). In wet years, available surface water supplies would be maximized; in dry years, groundwater supplies would be maximized through increased pumping at SCWA's groundwater facilities, including the proposed North Vineyard Wellfield (see Section 3.3.2, "SCWA Zone 40 Water Supply Master Plan."

With implementation of the Zone 40 WSMP, projected 2030 groundwater pumping volumes from the Central Basin (pumping by SCWA, other purveyors, and agricultural interests) would range from 235,000 afy to 253,000 afy for urban and agricultural demands (SCWA 2005a). Of that volume, it is projected that SCWA Zone 40 would pump a long-term average of 40,900 afy to meet urban water demands within Zone 40 through 2030 (Table 3). Groundwater pumping is expected to increase in 2030 by approximately 60% from 2004 volumes. Historical groundwater pumping from 2000 to 2004 and projected future pumping are shown in Table 3.

Table 3
Historical and Projected Groundwater Pumping in Zone 40

Basin Name	Pumping by Year (afy)									
	2000	2001	2002	2003	2004	2010	2015	2020	2025	2030
Central Sacramento Zone 40	20,022	22,306	22,949	22,745	25,790	34,125	28,837	40,470	31,324	39,097

Notes:
afy = acre-feet per year. Projected groundwater pumping based on modeling performed for the Urban Water Management Plan and Zone 40 WSMP. Long-term average annual groundwater supply of 40,900 afy agreed to in the WFA used for planning purposes. The decrease in groundwater extractions in 2015 and in 2025 are a result of increase surface water treatment capacity coming on-line.
Source: SCWA 2005b

4.1.2 SCWA WATER AGREEMENTS

In addition to meeting water demands within Zone 40, SCWA has entered into agreements that require delivery of water to purveyors and environmental interests. Many of these agreements relate to the Aerojet and Boeing Agreements described in Sections 3.3.3, "Agreements between Sacramento County, SCWA, Aerojet, and Boeing" and 3.3.4, "Water Supply Delivery Agreement between American States Water Company, Sacramento County, and SCWA." A brief summary of these agreements is described below. The relationship of these agreements to water supply and infrastructure planning in the NSA are discussed in Section 4.1.3, "fZone 40 North Service Area Water Supply Demand and Infrastructure."

AEROJET & BOEING AGREEMENTS

The Aerojet and Boeing agreements (discussed above in Section 3.3.3, "Agreements between Sacramento County, SCWA, Aerojet, and Boeing") transfer ownership of remediated groundwater to SCWA to be used as a replacement water supply for groundwater capacity lost by SCWA, GSWC, and Cal-Am as a result of past groundwater contamination. Aerojet and the City of Folsom also have an agreement for replacement water supplies (i.e., 5,000 afy) related to contaminated groundwater. This agreement could potentially be transferred to SCWA subject to the City of Folsom's agreement. The likelihood of the City of Folsom agreeing to this transfer is unknown and speculative.

GOLDEN STATE WATER COMPANY

SCWA's agreement with GSWC (discussed above in Section 3.3.4, "Water Supply Delivery Agreement between American States Water Company, Sacramento County, and SCWA"); specifies delivering 5,000 afy of replacement to their intake facilities on the Folsom South Canal. GSWC's need for additional replacement water (i.e., water amounts greater than 5,000 afy) would be determined annually in a meet-and-confer session with SCWA. Regardless of demonstrated need, GSWC's maximum allocation of replacement water supply in any year could not exceed 15,200 AF (less the 5,000 afy delivered to GSWC at the Folsom South Canal).

CAL-AM AGREEMENT

Currently, no separate replacement water supply agreement exists between SCWA and Cal-Am. However, it is the intent of SCWA to negotiate such an agreement (SCWA 2005b). During negotiations SCWA has been working cooperatively with the City of Sacramento to investigate ways to deliver POU surface water (or replacement water in dry years) to Cal-Am's service area that lies within the POU (this includes up to 5,000 afy of either POU or replacement water). This would allow groundwater currently being extracted in the POU area to be imported into areas affected by groundwater contamination.

MEMORANDUM OF AGREEMENT (MOA) FOR MANAGEMENT OF WATER AND ENVIRONMENTAL RESOURCES ASSOCIATED WITH THE LOWER COSUMNES RIVER

Under the terms of this agreement, SCWA would provide 5,000 afy of remediated groundwater or provide a contribution of capital towards the purchase of an alternative supply for the Cosumnes River Flow Augmentation Project. In any year that water is not required to fulfill the objectives of the Cosumnes River Augmentation Project SCWA reserves the right to use the 5,000 AF of water for other purposes. Remediated water would be conveyed down the Folsom South Canal for delivery to the Cosumnes River from October through December. This water would be delivered though facilities constructed as part of the Eastern County Water Supply Project.

SMUD DRY YEAR WATER REQUIREMENTS

SMUD's Water Forum PSA contains a provision related to the transfer of SMUD 2 water which requires SCWA to provide up to 10,000 afy of groundwater to SMUD to maintain operations at their Rancho Seco facility. The

volume of water required by SMUD is based on hydrologic year type and the volume of cut back they may experience on their remaining CVP contract. Delivery of this water would be through the Folsom South Canal.

4.1.3 ZONE 40 NORTH SERVICE AREA WATER SUPPLY DEMAND AND INFRASTRUCTURE

In response to the rapid pace of new development and to reliably plan for water demands throughout its service area, SCWA had divided the Zone 40 service area into three major subareas for planning purposes. From east to west, these areas are identified as the North Service Area (NSA), the Central Service Area (CSA), and the South Service Area (SSA). A portion of the City's planning area is located within the boundary of the NSA as shown in Exhibit 5~~6~~.

NORTH SERVICE AREA (NSA)

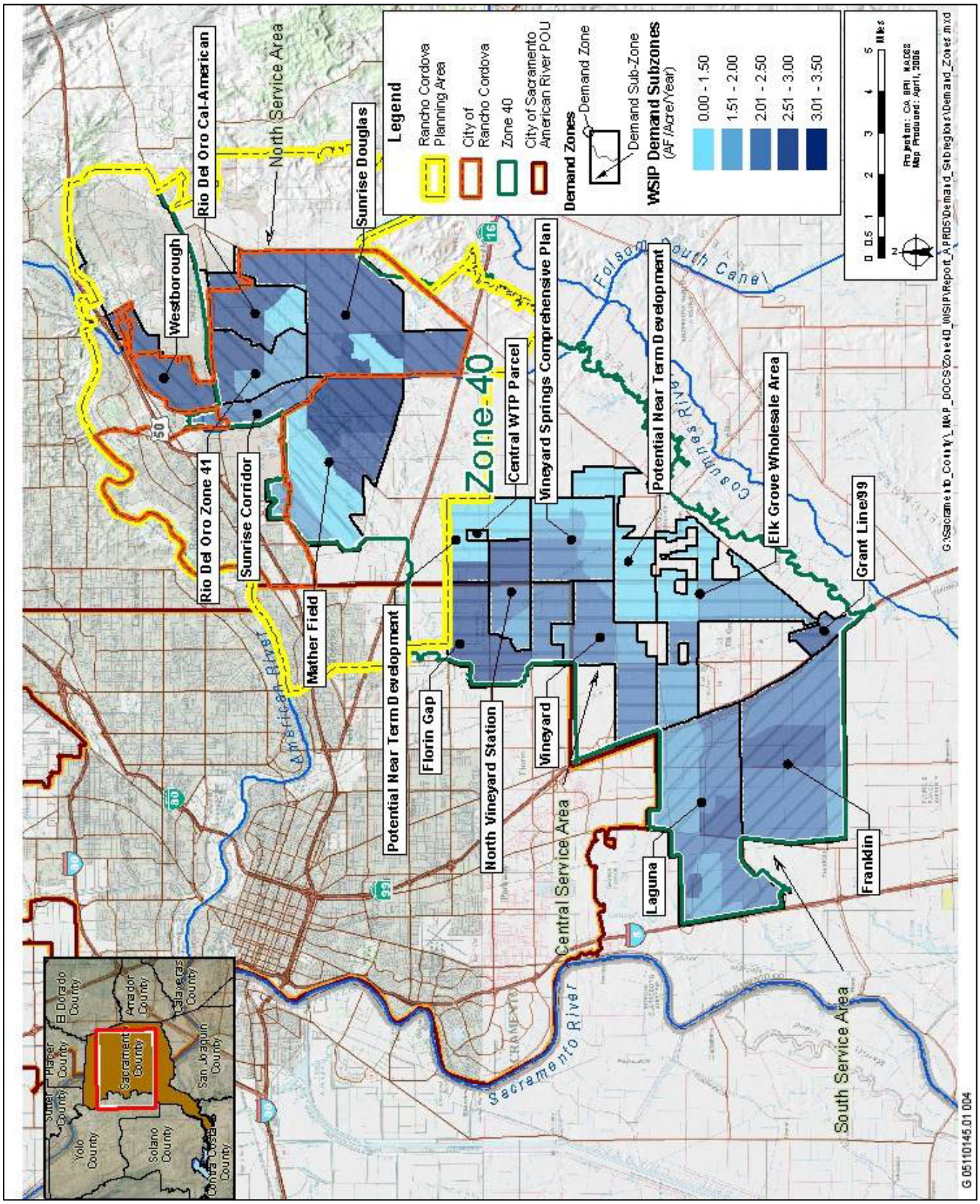
The NSA is located in the northern portion of Zone 40 and includes the areas SCWA identifies as Mather, Sunrise Corridor, Sunrise Douglas, Rio Del Oro (including the Cal-Am portion where wholesale of Zone 40 water supplies would be delivered), and Westborough (wholesale delivery of Zone 40 replacement water to GSWC as discussed below). SCWA completed a WSIP in April 2004 as part of its effort to address immediate water demands associated with development in the Sunrise Douglas Community Plan/Sunridge Specific Plan development area. Development of the Eastern County Replacement Water Supply Project (described in Section 3.3.2, "SCWA Zone 40 Water Supply Master Plan") and assumptions regarding amount, use, and location of diversion resulted in the need to update the initial WSIP. This WSIP is currently being updated and is in draft form. This report incorporates information from the draft WSIP for the NSA based on information provided by SCWA.

The primary purpose of the changes to the WSIP was ensure that groundwater extractions identified in the Aerojet agreements with SCWA do not result in an exceedance of the negotiated, long-term average sustainable yield of the Central Basin (i.e., 273,000 afy). A fundamental assumption in the development of the original WSIP for the NSA was that all remediated groundwater made available through the agreements would be diverted from the Folsom South Canal and that a new surface water treatment plant (WTP) would be constructed to treat this diverted water.

To ensure that the sustainable yield of the Central Basin would be maintain, the Eastern County Replacement Water Supply Project (prior to publication of its Notice of Preparation of an Environmental Impact Report) was modified such that 10,000 afy of remediated water would be diverted down the Folsom South Canal; 5,000 afy would be allocated to GSWC to meet their replacement water supply needs and 5,000 afy would be allocated for enhanced fishery flows on the Cosumnes River. The balance of the remediated groundwater (i.e., 25,000 afy) would be discharged to the American River where 5,000 afy may be diverted at the City of Sacramento's Fairbairn WTP for replacement water supplies for Cal-Am, and the remaining portion (i.e., 20,000 afy) would be diverted at the FRWP intake facility on the Sacramento River near the town of Freeport. SCWA has planned for the delivery of an additional 5,000 afy of replacement water supplies to GSWC (total 10,000 afy). Once diverted from the Sacramento River, the remediated groundwater would be conveyed to and treated at SCWA's ~~Central WTP~~Vineyard WTP and distributed within the NSA system. Table 4 describes the proposed uses for remediated groundwater.

A portion or all of new development water demands within NSA (other than projects on Aerojet Lands [i.e., Rio Del Oro and Westborough]) are proposed to be met through Zone 40's overall conjunctive use water supply program as described in SCWA's Zone 40 WSMP. Elements of the conjunctive use program include extraction of groundwater in the southerly portions of the Sunrise Douglas Community Plan area and from the proposed North Vineyard Well Field located near Excelsior Road and Florin Road. Surface water and replacement water (to the extent that they are available for new growth as per the Aerojet and Boeing contracts), would be distributed from the proposed ~~Central WTP~~Vineyard WTP once the FRWP diversion structure and the proposed ~~Central~~

~~WTP~~Vineyard WTP are constructed (initial phases anticipated to be completed by 2010). Initially (i.e., within the next 3-5 years),



Source: Goetz, pers. comm.. 2006

development within the NSA would rely solely on groundwater as described above; however, once surface and replacement water become available, SCWA would serve this area conjunctively through its proposed distribution facilities.

Table 4
SCWA Agreements Regarding Treatment and Use of Remediated Groundwater and Replacement Water Supplies

Discharge to American River System and Diverted at the Folsom South Canal		
GSWC Replacement Water		5,000
Cosumnes River Environmental Flow		5,000
	Total	**10,000**
Discharged to the American River System		
Diversion at the City of Sacramento Fairbairn WTP [1]		5,000
Diversion at FRWP's intake facility on the Sacramento River [2]		15,000
	Total	**20,000**
Additional GSWC Replacement Water Supplies through Zone 40[3]		**5,000**
Total		**35,000**

Notes:
FRWA = Freeport Regional Water Authority; GSWC = Golden State Water Company; WTP = Water Treatment Plant
[1] Water diverted to City of Sacramento's Fairbairn Water Treatment Plant for California-American Water Company.
[2] Treated water piped to storage tank facilities near Sunrise Blvd and Douglas Road for use in North Service Area system.
[3] SCWA has agreement with GSWC for replacement water supplies up to a total of 15,200 including water diverted at Folsom South Canal. SCWA is estimating that it will provide an additional 5,000 afy of replacement water supplies to GSWC for a total of 10,000 afy out of the 15,200 afy. However; any replacement water in excess of the 5,000 af diverted at the Folsom South Canal must be developed by means of an annual meet-and-confer session between the County and GSWC.
Source: SCWA 2006

Both Rio Del Oro and Westborough are part of the "Aerojet Lands" identified in the agreements between Sacramento County, SCWA, Aerojet, and Boeing as described in Section 3.3.3, "Agreements between Sacramento County, SCWA, Aerojet, and Boeing". While Westborough lies outside of Zone 40, Rio del Oro is located within Zone 40 and SCWA would be the purveyor that serves this project provided that a sufficient quantity of water would remain after replacement water supply obligations are met according to the agreements. Westborough would likely receive water supplies through Zone 40 using the replacement water provided to GSWC via the Folsom South Canal. Rio del Oro would receive water supplies identified in the Eastern County Replacement Water Supply Project (i.e., water supplies would come from the replacement water diverted at FRWP intake structure and treated at the ~~Central WTP~~Vineyard WTP).

The water allocated in Aerojet's agreement with the City of Folsom (i.e., 5,000 afy) could be used as a source of water for these projects; however, the City has not given any indication that they would transfer these water supplies to SCWA. Further, it is likely that the City of Folsom would use these supplies to serve the Easton Development project, which is located on Aerojet lands, but within the City of Folsom. Westborough would likely receive water supplies through Zone 40 using the replacement water provided to GSWC via the Folsom South Canal.

Existing and projected supplies and demand for the NSA as identified in the ~~NSA's~~ Xone 40 WSIP are presented in Table 5. Existing water demands within the NSA are approximately 2,404 afy, and projected future (2030) water demands are approximately 37,314 afy (approximately 15.5 times current demand).

Table 5
Existing and Projected Future Water Supply and Demand for the SCWA North Service Area

Service Area	Demand Region	Existing Demand		Buildout Demand	
		Annual Average (afy)	Max Day (mgd)	Annual Average (afy)	Max Day (mgd)
NSA	Mather Field	1,327	2.37	7,624	13.61
	Rio Del Oro—Cal-Am	-	-	3,917	6.99
	Rio Del Oro—Zone 40	-	-	4,872	8.70
	Sunrise Corridor	1,077	1.92	1,077	1.92
	Sunrise Douglas	-	-	15,492	27.66
	Westborough	-	-	4,332	7.74
	NSA Total Demand	**2,404**	**4.29**	**37,314**	**66.62**

Notes: afy = acre-feet per year; Cal-Am = California-American Water Company; mgd = million gallons per day; NSA = North Service Area
Source: SCWA 2006

4.1.3 Overall Assessment of SCWA Water Supply Reliability

SCWA has developed a long-term conjunctive use plan that would result in water usage that reflects the goals of the WFA. In normal years, the conjunctive use program would result in average groundwater use of approximately 39,000 afy. In dry years, when surface water availability is limited, groundwater production would increase to 70,000 afy to make up for the reduction in surface water deliveries (i.e., dry-year cut backs). In consecutive dry years, water demand management programs would be implemented to a higher degree to reduce the potential impacts from increased groundwater extractions. Long-term average groundwater pumping levels within the Central Basin would equal 40,900 afy for Zone 40 and the negotiated long-term sustainable yield the Central Basin (i.e., collectively with all other groundwater users) of 273,000 afy.

With implementation of the Zone 40 WSMP, Zone 41 UWMP, and Zone ~~41~~ 40 WSIP~~, and the NSA WSIP~~, Zone 40's NSA service area would be served with reliable, long-term water supplies. SCWA is a groundwater appropriator and intends to continue to extract groundwater to meet its customer demands within the limits of the negotiated sustainable yield of the Central Basin. SCWA has secured and is in the process of securing surface water entitlements that would allow SCWA to meet its projected 2030 water demands. In addition, SCWA has entered into agreements with Aerojet and Boeing (described in Section 3.3.3, "Agreements between Sacramento County, SCWA, Aerojet, and Boeing") for the transfer of ownership rights of remediated water discharged by Aerojet. This remediated water would be used for beneficial uses within Zone 40 and in the NSA (where portions of the City's planning area are located). Because SCWA intends to continue pumping groundwater, it has secured most of its surface water rights, has secured rights to beneficial reuse of remediated groundwater within its service area, and is proceeding with development of several water supply treatment and conveyance facilities, SCWA water supplies are considered to have a high reliability of being delivered. However, additional conveyance and treatment facilities would need to be approved and constructed to deliver these supplies to the NSA.

Providing reliable service to NSA is perhaps the most challenging of the three (i.e., North, Central, and South) SCWA service areas. Challenges surrounding the provision of water to the NSA: 1) the presence of groundwater contamination, 2) agreements prescribing the priority uses for replacement water supplies, 3) constructing the conveyance and treatment facilities to serve new development within Aerojet lands, 4) constructing the infrastructure necessary to serve new development in the Sunrise Douglas Community Plan area, 5) substantial

changes in ground surface elevation creating a need for pressure zones, and 6) the relatively low yield of groundwater in the upper elevations where new development is taking place.

SCWA's use of replacement water supplies to serve the NSA and Aerojet lands is considered a challenge because the amount of replacement water supplies that SCWA has available to serve new growth and development is dependent upon the amount of water that is ultimately delivered to other water purveyors for replacement water supplies (discussed in Section 4.1.2, "SCWA Water Agreements"). For example, GSWC has an agreement for replacement water supplies; 5,000 afy for diversion at the Folsom South Canal, and up to an additional 10,200 afy through SCWA Zone 40 facilities.

SCWA has also indicated that it anticipates entering into an agreement with Cal-Am to provide replacement water supplies and is currently planning on providing 5,000 afy. However, a separate replacement water supply agreement does not currently exist between SCWA and Cal-Am. The highest priority use for remediated groundwater is for replacement water for GSWC and Cal-Am. Once replacement water supply obligations are met (maximum of 20,200 afy combined for GSWC and Cal-Am), SCWA would use excess replacement water supplies (approximately 15,000 afy) to serve new growth and development on Aerojet lands (Rio del Oro, Westborough, etc.).

While SCWA has planned for adequate infrastructure (e.g., ~~Central WTP~~Vineyard WTP, FRWP, North Vineyard Wellfield, Eastern County Replacement Water Supply Project) and the water supplies, themselves, are considered to have a high reliability of implementation (i.e., delivery to a designated user), SCWA could be limited in the amount of replacement water supplies (i.e., 15,000 afy) it is able to deliver to new development because GSWC's and cal-Am's agreements to receive replacement water supplies have priority over SCWA's delivery of replacement water supplies to new development.

4.2 GOLDEN STATE WATER COMPANY (CORDOVA SYSTEM)

GSWC's Cordova System service area is entirely within the City's planning area. An overview of water supply sources, existing and projected demands, and the reliability of supplies to meet projected demands is provided below. These data were obtained from the UWMP (GSWC 2005).

4.2.1 WATER SUPPLY SOURCES

The GSWC water supply for the Cordova System consists of surface water from the American River, groundwater extraction from the Central Basin, and future replacement water supplied by SCWA. Replacement water would be made available by SCWA (as allowed under the Aerojet agreement) to offset groundwater lost as a result of contamination of GSWC groundwater wells from past operations at the Aerojet facility. GSWC's agreement with SCWA for replacement water supplies is discussed in Section 3.3.4, "Water Supply Delivery Agreement between American States Water Company, Sacramento County, and SCWA." GSWC also entered into a temporary water transfer agreement with SMUD to allow GSWC to divert up to an additional 7,000 afy from the Folsom South Canal under SMUD's CVP contract entitlement. SMUD has a water service contract with the USBR (Contract No. 12-06-200-5198A) for delivery of as much as 60,000 AFY of municipal and industrial water from the CVP.

American River water is withdrawn from the Folsom South Canal, which extends through the Cordova System service area, and is treated at the Coloma WTP and the Pyrites WTP. The Coloma WTP has a maximum reliable daily treatment capacity of approximately 7,140 gallons per minute (gpm). The Pyrites WTP, which became operational in September 2005, has a maximum reliable daily treatment capacity of about 3,150 gpm. Collectively, the Coloma WTP and the Pyrites WTP provide sufficient capacity for treatment of more than 17,000 afy (10,290 gpm) of surface water diverted from the Folsom South Canal.

Currently, GSWC pumps groundwater from 15 active wells in the Central Basin. These wells have a maximum pumping capacity of 31,500 afy. However, between 2000 and 2004, the actual pumping rates averaged 11,630 afy.

Table 6 summarizes the current and planned water supplies available to GSWC for the Cordova System that would meet the projected water demands under normal water years. This water supply summary is based on analysis of supplies from surface water, groundwater, and replacement water. Surface water from the American River, the SMUD water transfer and Aerojet replacement water (5,000 afy is diverted at the Folsom South Canal and is expected to be available in 2010) accounts for approximately 50 % of GSWC water supplies, while the remainder is provided by groundwater production and 5,000 afy of Aerojet replacement water delivered through SCWA facilities (as described in Section 3.3.4, "Water Supply Delivery Agreement between American States Water Company, Sacramento County, and SCWA"). There is no projected recycled water supply available for this system. GSWC's water supply is projected to increase by approximately 15 % between 2005 and 2030 (Table 6).

Table 6
Current and Planned Water Supplies for the GSWC Cordova System (afy)

Source	Year					
	2005	2010	2015	2020	2025	2030
Surface water from American River[1]	5,000	5,000	5,000	5,000	5,000	5,000
SMUD Water Transfer[2]	5,000	0	0	0	0	0
Aerojet Replacement Water via Folsom South Canal[3]	0	5,000	5,000	5,000	5,000	5,000
GSWC Untreated Groundwater[4]	8,116	7,450	4,500	4,500	4,500	4,500
Aerojet Replacement Water through SCWA[5]	0	2,068	5,999	6,314	6,329	6,329
Recycled Water	0	0	0	0	0	0
Total	**18,116**	**19,518**	**20,499**	**20,814**	**20,829**	**20,829**

Notes:
afy = acre-feet per year; GSWC = Golden State Water Company; SCWA = Sacramento County Water Agency; SMUD = Sacramento Municipal Utility District

1 GSWC American River rights.

2 Under this water transfer from SMUD, GSWC is entitled to divert up to 10,000 afy from the American River through July 29, 2007, and for additional years upon request. However, GSWC plans to use only 5,000 afy of this entitlement because of limited surface-water treatment capacity and its desire to maintain its groundwater rights through the Aerojet replacement-water operations.

3 Aerojet replacement-water obligation.

4 Based on GSWC's maximum annual extractions before 2005 and projected changes to groundwater supply through 2030.

5 SCWA would recapture, treat, and deliver groundwater to GSWC up to an additional 10,200 afy of groundwater discharged by Aerojet into the American River. Please note that GSWC is relying on a total of 11,329 afy of replacement supplies from SCWA. For amounts greater than 10,000 afy (i.e., 1,329 afy), GSWC and SCWA would need to negotiate the provision of these supplies on a yearly meet-and-confer basis.

Source: GSWC 2005

SURFACE WATER

GSWC possesses a pre-1914 appropriative right to divert up to 10,000 afy from the American River via the Folsom South Canal at a maximum withdrawal rate of 20 cfs or 13 mgd. Appropriative surface water rights initiated prior to 1914 are not subject to the Water Commission Act and successor laws relating to water right permitting requirements, and thus do not require a permit from the State Water Resources Control Board. In 1994, GSWC entered into an "Agreement for Reallocation of Water under Co-Tenancy Agreement" with the City of Folsom to lease 5,000 afy of its water rights to the City of Folsom. The company preserved 5,000 afy of the

remaining water right which is diverted from the Folsom South Canal for use within the Cordova System. During the last 20 years, GSWC has used as much as 4,784 afy of this entitlement.

In addition to the 5,000 afy obtained from GSWC's pre-1914 water right to the American River, GSWC's temporary water-transfer agreement with SMUD allows GSWC to divert up to an additional 10,000 afy from the Folsom South Canal under SMUD's CVP contract entitlement. The SMUD agreement became effective on April 29, 2002 and expires on July 29, 2007, unless it is renewed pursuant to a request by GSWC. GSWC is also entitled to continue diversions of 5,000 afy from the Folsom South Canal pursuant to the terms of a settlement agreement reached with Aerojet. GSWC plans to use only 5,000 afy of its SMUD entitlement because of limited surface water treatment capacity at the Coloma WTP and the Pyrites WTP and its desire to maintain its groundwater rights through Aerojet replacement water operations (SCWA 2005).

The Cordova System's distribution facilities have been designed with several interconnections to neighboring water purveyors for emergency purposes. GSWC maintains three 6-inch interconnections with the Cal-Am's distribution system on the west side of the Cordova System, and a 12-inch interconnection with the City of Folsom's distribution system at the eastern edge of the Cordova System. In addition, the Cordova System has five water storage reservoirs with a total capacity of 9.5 million gallons; one additional reservoir with additional 5.0 million gallons of storage capacity is scheduled to be online in spring 2006.

GROUNDWATER

GSWC pumps groundwater for the Cordova System from 15 production wells located in the Central Basin. The Central Basin is a subbasin of the Sacramento Valley Groundwater Basin and is described above (section 3.4.3, "Groundwater Resources").

The Cordova System has a total normal-year capacity of 21,669 gpm (31,500 afy) (GSWC 2005). In some areas of the basin, groundwater has been impaired by contaminants, including volatile organic compounds (VOCs), perchlorate, and N-nitrosodimethylamine (NDMA) from Aerojet's rocket propellant manufacturing and testing facility located immediately east of the Cordova System. Groundwater contamination forced GSWC to decommission some wells. However, decommissioning the wells has not lowered GSWC's overall system production capacity because non-contaminated groundwater wells have been modified to increase their rated capacity.

It has been predicted that by 2015 all but two of GSWC's wells would experience contamination levels that may cause their inactivation (GSWC 2005). The two remaining wells, Wells 17 and 23, are not expected to be affected by contamination until at least 2032. These wells have a combined production capacity of 3,100 gpm (GSWC 2005).

Groundwater lost as a result of contamination would be replaced by SCWA under terms of the Aerojet/Boeing agreement under its replacement water obligations. Approximately 5,000 afy of remediated groundwater would be discharged to the American River system. This water would be wheeled through, and withdrawn from, the Folsom South Canal: GSWC's current surface water point of diversion. Up to an additional 10,200 afy of remediated groundwater could be delivered to GSWC via the FRWP and ~~Central WTP~~Vineyard WTP (agreement with SCWA and Aerojet discussed in Section 3.3.4, "Water Supply Delivery Agreement between American States Water Company, Sacramento County, and SCWA.")

Table 7 presents the projected groundwater pumping volumes by the Cordova System. As a result of changes in groundwater quality, the groundwater supply for the Cordova System is expected to decrease between 2005 and 2015.

Table 7
Projected Groundwater Pumping Volumes by Cordova System (afy)

Basin Name	Year					
	2005	2010	2015	2020	2025	2030
Central Sacramento	8,116	7,450	4,500	4,500	4,500	4,500

Note: afy = acre-feet per year
Source: GSWC 2005

4.2.2 EXISTING AND PROJECTED WATER DEMANDS

Projections of the existing and projected future water demands within GSWC's service area were calculated for the years 2005 through 2030 in 5-year increments. Future water demands were estimated based on population projections prepared by the Sacramento Area Council of Governments (SACOG). Billing data for the metered water connections from 1999 through 2004 were analyzed to obtain unit water use factors (i.e., the average water use per land use) for various land use categories with in GSWC's service area.

To provide an accurate projection of total water demand, other water uses (e.g., sales), as well as any water lost during conveyance (e.g., evaporation, leaks) has been incorporated in the total water demand projections. "Lost water" is defined as the difference between annual production and supply and annual sales. Included in the lost water are system losses (from leaks, reservoir overflows, or inaccurate meters) and water used in operations (e.g., system flushing). Because the Cordova System is not completely metered, the percent of unaccounted-for water for the metered accounts was used for both metered and unmetered areas. From 1999 through 2004, unaccounted-for water averaged 3.25% of the total production for the metered connections (GSWC 2005). Table 8 summarizes the projections of water sales, unaccounted-for water, and total water demand through the year 2030.

Table 8
Projected Water Sales, Unaccounted-for System Losses, and Total Water Demand (afy) for the GSWC Cordova System

Year	Projected Water Sales	Unaccounted-for System Losses	Total Water Demand
2000	15,880	533	16,413
2005	17,528	588	18,116
2010	18,885	633	19,518
2015	19,833	665	20,499
2020	20,139	675	20,814
2025	20,153	676	20,829
2030	20,153	676	20,829

Note: afy = acre-feet per year
Source: GSWC 2005

4.2.3 RELIABILITY OF WATER SUPPLY TO MEET DEMANDS

The Cordova System obtains its water supply from three sources: surface water, local groundwater, and replacement water under the settlement agreement with Aerojet. In general, GSWC's supply is expected to be 100 % reliable through 2030. This reliability is a result of: a highly reliable surface water supply from the American River, implementation of the settlement agreement prescribing priority uses for SCWA replacement water supplies, and historically reliable groundwater supply from the Central Basin.

RELIABILITY OF SURFACE WATER

As mentioned in Section 4.2.1, "Water Supply Sources," above, GSWC has a pre-1914 American River appropriative water right for the diversion of up to 5,000 afy for use in the Cordova System. Appropriative surface water rights initiated before 1914 are not subject to the Water Commission Act and successor laws relating to the water right permitting requirements, and thus do not require a permit from the State Water Resources Control Board. Because appropriative rights are granted priority based on the year of initiation, the early priority date of GSWC's American River right (1851) provides this right a high priority, which in turn indicates that this supply has a high reliability of being delivered.

RELIABILITY OF GROUNDWATER

Since 1995, GSWC has extracted a long-term average of 11,753 afy of groundwater from the Central Basin (GSWC 2005). GSWC's highest historical production occurred in 2001 when 13,257 afy was pumped. As described above, portions of the basin are severely impaired by groundwater contamination, caused primarily by past operations at Aerojet, which is located immediately east of the Cordova System. This contamination has caused GSWC to suspend operation of several groundwater wells.

As a result of the contamination, GSWC filed litigation against both Aerojet and the State of California. GSWC settled its action against the State in January 2003 and settled with Aerojet in October 2004. Under the Settlement Agreement, Aerojet guarantees that replacement water supplies would be made available to offset lost groundwater production in the Cordova System, up to a maximum of 15,200 afy (also described in GSWC's agreements with Aerojet and SCWA). As discussed previously, 5,000 afy of replacement water supply would be diverted at the Folsom South Canal, the remaining portion would be made available through SCWA facilities on a meet-and-confer basis for supplies that exceed a total of 10,000 afy.

It is anticipated that in the future, additional groundwater wells may become affected by contamination. As a result, as GSWC wells are removed from the water supply system, remediated groundwater from Aerojet would be delivered to GSWC to offset any losses in groundwater pumping capacity subject to the terms of the adopted agreements between GSWC, SCWA, and Aerojet. Because of the agreements for replacement water supplies, water supplies lost from groundwater contamination (up to 10,000 afy) and replaced by SCWA are considered to have a high reliability for being delivered. GSWC's agreement for replacement water supplies with Aerojet and SCWA allow the delivery of up to an additional 5,200 afy (total not to exceed 15,200 afy). Replacement groundwater water supplies in excess of 10,000 afy would also be considered to have a high reliability for being delivered, although these supplies would need to be negotiated between GSWC and SCWA on an annual meet-and-confer basis.

Groundwater production from remaining wells is expected to produce up to 4,500 afy through at least 2030. Because of existing groundwater contamination, and the anticipation that these wells would be removed from service by 2032, groundwater pumped by GSWC is considered to have a moderate reliability of being delivered.

RELIABILITY OF REPLACEMENT WATER

As mentioned above, Aerojet and SCWA have entered into an agreement for the delivery of up to 15,200 afy of replacement water to GSWC. For the reasons described above, replacement water supplies are considered to have a high reliability of being delivered.

OVERALL ASSESSMENT OF CORDOVA SYSTEM WATER SUPPLY RELIABILITY

Supply reliability for the Cordova System depends on the reliability of the surface water rights, groundwater production, and replacement water supplied via agreements between GSWC, Aerojet, and SCWA. The replacement water measures undertaken by Aerojet and SCWA would ensure that GSWC has the supplies

necessary to meet its projected water supply demands through 2030. Two production wells are expected to remain operational until at least 2032, which allows for the production of up to 4,500 afy of groundwater (Table 7). When this amount of groundwater is combined with 5,000 afy of surface water rights from the American River and up to 15,200 afy of replacement water from Aerojet and SCWA, a sufficient water supply (i.e., 24,700 afy) exists to meet all projected water demands (i.e., 20,829 afy) in the Cordova System. It should be noted that available GSWC supplies actually exceed the supplies needed to meet the projected demands because GSWC is not currently using a SMUD water transfer and does not expect to use the water transfer during its planning horizon (i.e., 2030) to meet future demands. Because projected supplies currently exceed projected demands, GSWC's water supply is considered to have a high reliability of being delivered.

4.3 CALIFORNIA-AMERICAN WATER COMPANY

Cal-Am's Northern Division consists of nine distinct water systems forming one operational entity that is the largest private water operation in Sacramento County with a total of about 43,100 connections serving an estimated 170,500 people. The 9 systems are not all contiguous, but are surrounded by numerous other utilities. The 9 systems that comprise the Northern Division include: Antelope, Arden, Lincoln Oaks, Parkway, Suburban/Rosemont, Sunrise, West Placer, Isleton and Walnut Grove. The Sunrise system is also known as Security Park; however, it is referred to as Sunrise in the Cal-Am's UWMP (Cal-Am 2006). Suburban/Rosemont and Sunrise are the two Cal-Am systems that provide water to a portion of the City's planning area.

Because the service area of Cal-Am's Northern Division is so large, only the systems that provide water to the City's planning areas are discussed below. An overview of water supply sources, existing and projected water supply demands, and the reliability of water supplies to meet projected demands is provided below. These data were obtained from Cal-Am's UWMP (Cal-Am 2006).

4.3.1 WATER SYSTEM SUPPLY SOURCES

This section describes Cal-Am's water supply systems that would provide service within the City's planning area.

SUNRISE SERVICE AREA

Citizens Utilities (a private water utility provider which was later purchased by Cal-Am) purchased the Sunrise service area (also known as Security Park) from McDonnell Douglas in the early 1980s. It consists of approximately 2.8 square miles of land located immediately north of Douglas Road and east of Sunrise Boulevard, approximately 1.5 miles east of Mather Airport. Presently, this area is mostly undeveloped, serving approximately 20 commercial customers. The system includes five groundwater wells, only one of which is in regular use, with other wells available as needed for backup. The Sunrise Service area accounts for less than 0.1% of the Northern Division's production and sales.

SUBURBAN SERVICE AREA

The Suburban service area consists of two systems, the Suburban system and the Rosemont system. These systems lie adjacent to each other and span the north and south sides of U.S. Highway 50 about 9 miles east of downtown Sacramento. This service area (i.e., Suburban /Rosemont) is located entirely within the City's planning area, south of the American River, and north of Mather Airport and includes portions of the developed (i.e., urban) areas of Rancho Cordova. There are approximately 17,000 customers in the Suburban/Rosemont area, which are served via 8 groundwater wells for the Rosemont subarea and 20 wells within the Suburban subarea. In all, the Suburban service area accounts for approximately 30% of the Northern Division's production.

4.3.2 WATER SUPPLY DEMAND

Cal-Am has estimated future population levels within its Northern Division. These projections are identified by service area in 5-year intervals from 2000 to 2025 as shown in Table 9. Population levels within the Sunrise service area are not expected to increase from 2005 to 2025 because this area is fully built out with commercial land uses (Cal-Am 2006). Population levels within the Suburban/Rosemont subarea are expected to increase by only one percent from 2005 to 2025. Total population in the Northern Division service area is projected to increase by 21% from 2005 to 2020 (Table 9).

Table 9
Existing and Projected Population for Cal-Am's Northern Division by Service Area

Service Area	2000	2005	2010	2015	2020	2025	Percentage Increase from 2005 to 2025
Antelope	25,250	25,880	26,527	26,792	27,059	27,329	6%
Lincoln Oaks	35,970	36,869	37,790	38,169	38,550	38,935	6%
Arden	2,397	2,456	2,517	2,542	2,568	2,594	6%
Suburban/Rosemont	49,754	49,882	50,510	50,138	50,269	50,398	1%
Parkway	37,085	53,735	54,787	55,848	56,817	58,012	8%
West Placer	0	675	6750	13,500	20,250	27,000	3900%
Sunrise	0	0	0	0	0	0	0%
Walnut Grove	466	477	489	495	499	504	6%
Isleton	857	879	901	910	919	928	6%
TOTAL	151,779	170,453	179,721	188,388	197,031	205,700	21%

Note: Cal-Am = California-American Water Company
Source: Cal-Am 2006

Cal-Am estimated existing and projected future water demands for the Northern Division for 2006 through 2025. (Table 10). Cal-Am's total demands are projected to grow from 47,620 afy in 2006 to 56,190 afy in 2025. This is an increase of 8,570 afy over the 25-year period, or approximately 18 % (Table 10). However, Cal-Am did not project individual service area water demands in its UWMP. Cal-Am notes that the Sunrise system accounts for less than 0.1% of the Northern Division's production and sales, and the Suburban system accounts for approximately 30% of the Northern Division's production and sales. Assuming that these percentages apply to both water supply and water demand, EDAW calculated water supplies and demands for the Sunrise and Suburban/Rosemont water systems using Cal-Am's projected growth factor of 1% for the Suburban/Rosemont service area and 0% for the Sunrise service area for the period from 2005 to 2025. These projected demands are shown in Table 10.

Table 10
Summary of Current and Projected Water Demand and Sources of Water Supply (afy) for Cal-Am

Year	2005	2010	2015	2020	2025
Projected Demand	**47,620**	**50,510**	**52,500**	**54,380**	**56,190**
Projected Supply by Source					
Cal-Am Groundwater	43,600	33,650	34,180	33,550	33,910
Wholesale Surface Water Supply Purchases:					

Table 10 Summary of Current and Projected Water Demand and Sources of Water Supply (afy) for Cal-Am					
Year	**2005**	**2010**	**2015**	**2020**	**2025**
Placer County Water Agency (West Placer Service Area)	140	1,360	2,720	4,080	5,440
~~SCWA (~~Parkway~~)~~	2,420	3,500	3,500	4,000	4,000
Citrus Heights Water District (Lincoln Oaks Intertie with SSWD)	20	9,000	9,000	9,500	9,500
City of Sacramento (Arden Intertie)	1,440	3,000	3,100	3,250	3,340
Transfers and Exchanges	(See "Wholesale Purchases" above. Transfers and exchanges of water occur pursuant to conjunctive-use agreements.)				
Total Water Supply	**47,620**	**50,510**	**52,500**	**54,380**	**56,190**
Sunrise Service Area Demands	48	48	48	48	48
Suburban/Rosemont Service Area Demands	14,286	14,322	14,358	14,394	14,429
Total Cal-Am Water Demands within City planning area[1]	**14,334**	**14,370**	**14,406**	**14,442**	**14,477**

Notes:
afy = acre-feet per year; Cal-Am = California-American Water Company; SCWA = Sacramento County Water Agency; SSWD= Sacramento Suburban Water District
[1] Estimated demands for City's Planning Area based on projected population growth and percentage of water use for service areas within planning area compared to the total Northern Division service area.
Source: Cal-Am 2006

4.3.3 Overall Assessment of Cal-Am Water Supply Reliability

Cal-Am operates more than 100 groundwater wells in the Northern Division (inside and outside the Central Basin) for a total theoretical capacity of approximately 100,000 afy (Cal-Am 2006). It should be noted that while Cal-Am's system could pump up to 100,000 afy of groundwater, it is highly unlikely that Cal-Am would undertake such an aggressive groundwater pumping scenario in the Central Basin because of its commitments to adhere to the negotiated sustainable yield of the Central Basin (i.e., 273,000 afy). Further, this pumping capacity is for Cal-Am's Northern Division, of which some service areas are located outside the Central Basin. While all Cal-Am service areas, except for Isleton and Walnut Grove, have interties with other neighboring water purveyors; it is unknown what amount of Cal-Am's groundwater pumping capacity is available to exclusively serve the Sunrise and Suburban/Rosemont service area. Nonetheless, the presence of intertie connections between service areas at a minimum indicates that sufficient emergency groundwater reserves are available within its system. Further, groundwater currently pumped to serve the Northern Division and projected future pumping amounts (Table 10) are considered to have a high reliability of being delivered because Cal-Am has historically pumped a reliable supply of groundwater from its system. Cal-Am would tailor the Northern Division's water supply mix during dry and very dry years in cooperation with the Sacramento Groundwater Authority and the Central Sacramento Groundwater Forum determinations as to how much surface water would be available under conjunctive use programs in any given year (Cal-Am 2006). Cal-Am projects that they would be able to use as much as 23,300 af of imported surface water supplies during normal years. In a very dry year, or the third year of a multiple dry year scenario, Cal-Am projects 100% of the Division's total water supply would be groundwater (Cal-Am 2006).

Similar to the other water purveyors that rely on groundwater from the Central Basin, Cal-Am's groundwater wells within the Sunrise and Suburban/Rosemont service area could at some future point become impaired by the local contamination problem associated with past operations at Aerojet and the former Mather Air Force Base.

Cal-Am has however has not entered into an agreement with SCWA for replacement water supplies. However, it is SCWA's intention to enter into an agreement for replacement water supplies with Cal-Am; and as a result, SCWA has planned for approximately 5,000 afy of replacement water supplies allocated to Cal-Am. See Section 4.1.2, "SCWA Water Agreements". Although Cal-Am has not relied upon replacement water supplies to meet future demands in its UWMP, water supplies potentially lost from groundwater contamination (up to 5,000 afy) and replaced by SCWA are considered to have a high reliability of being delivered.

4.4 OTHER WATER PURVEYORS IN THE VICINITY OF THE PLANNING AREA

Omochumne-Hartnell Water District (OHWD) is a primarily agricultural water district located adjacent to and partially overlapping the southeastern portion of SCWA Zone 40 (Exhibit 3) and~~of~~ the City's planning area ~~(Exhibit 4)~~. While OHWD does not own any water rights, it owns and operates surface water and groundwater distribution facilities for landowners in its service area. Land use within OHWD's service area is primarily in agriculture. Landowners divert water from the Cosumnes River using flashboards to create diversion dams, which allows flood irrigation for agricultural fields adjacent to the Cosumnes River. Landowners that are not located adjacent to the Cosumnes River have groundwater wells that are pumped for irrigation. (Lowry, pers. comm., 2006).

OHWD is a member of the Southeast Sacramento County Agricultural Water Authority, a Joint Powers Authority (JPA) made up of three water districts: OHWD, Clay Water District, and Galt Irrigation District. The JPA is involved in planning efforts regarding groundwater management, water resource utilization, flood control, and groundwater recharge. As part of these efforts, the JPA has been working with many other agencies and organizations, including SCWA in the management of regional groundwater and surface water resources.

While OHWD's service area does not encompass any portions of the City's planning area, it is a neighboring water purveyor that could be a source of potential future water supplies as land within its service area gradually converts from agricultural to urban land uses. .

The City of Folsom, Placer County Water Agency and SSWD are water purveyors in the vicinity of the planning area who may be able to water supplies to the City's planning area. These water districts and their potential to provide water supplies to the City are briefly discussed in Section are discussed in Section 5.4.1 "Water Transfers and Exchanges with nearby Purveyors."

5 PROJECTED WATER DEMANDS FOR THE CITY OF RANCHO CORDOVA GENERAL PLAN PLANNING AREA

5.1 METHODOLOGY FOR ESTIMATING WATER DEMANDS

The City provided total acreages for the existing and proposed land use designations in its corporate limits and the larger planning area. The City estimates that its corporate city limits would build out by 2030, while build out of its planning area would occur sometime after 2030. A specific timeline for build out of the planning area is not known and is dependant on local market conditions including demand for housing, employment uses, and timing of regional infrastructure, among a number of factors. For purposes of this water supply analysis, buildout of the City's planning area is assumed to occur by 2050.

This water supply evaluation uses the same methodology for estimating water demands that SCWA uses in its long-term water supply planning. To estimate projected water demands for the City's planning area, an individual unit water demand factor is applied to each land use designation within the planning area and projected water demands are calculated for each land use category in acre-feet per acre per year (af/acre/year). SCWA developed unit water demand factors for land use types in its 2030 Zone 40 WSMP (SCWA 2005a) and these demand factors are used to estimate the City's demands. SCWA's water demand factors reflect a 25.6 percent level of water conservation (compared with an unrestrained condition), pursuant to the guidelines set forth in the WFA and are normalized to account for hydrologic year differences.

5.2 PLANNING AREA WATER DEMANDS

Water demand estimates for the City's planning area were developed using the 2030 unit water demand factors presented in the Zone 40 WSMP for similar land use categories. The total annual water demand assumes system losses of 7.5%: the same factor used by SCWA (SCWA 2005a). Total annual water demands within the corporate city limits are estimated to be 57,299 afy at buildout. Water demands for the larger planning area (areas outside the corporate limits) are estimated to be 71,410 afy. Total water demands for the entire planning area are estimated to be 128,709 afy (Table 11).

Table 12 identifies projects within Rancho Cordova specific plan, comprehensive plan, and community planning areas that have been identified in the City's General Plan. As indicated in the table, many of these plans have either been approved or are currently proposed and proceeding through the planning process. Projects that have been approved by the City (or the County prior to the City's incorporation) have identified and secured a long-term reliable water supply source from one of the water purveyors within the City. Many of the proposed projects also have identified and/or secured a long-term water supply source. The water demands associated with many of the proposed projects have been accounted for in SCWA's water supply planning documents including the recently prepared SCWA Zone 40 WSMP, Zone 41 UWMP, and Zone 40 ~~NSA~~ WSIP.

As presented in Exhibit 5~~6~~, SCWA is planning for the delivery of long-term water supplies to its NSA. Within the NSA, SCWA has identified the water demand areas of Westborough, Sunrise Douglas, Rio del Oro, Sunrise Corridor, and Mather Field. These areas are all within the City's corporate limits with the exception of Mather Field (located in the City's planning area). Table 13 lists SCWA's NSA demand areas and how these areas correspond to the City's planning area. The majority of the City's corporate limits fall within the NSA. Areas that lie outside the NSA fall within the service area of GSWC and Cal-Am, with the exception of a small area located in the southern portion of the NSA. This area is located within SCWA's Zone 40 2030 Study Area. While SCWA has allocated water supply and planned for infrastructure to serve its NSA, the total water demand within these planning areas may exceed the amount of water planned to be delivered to the NSA by SCWA. Service within the NSA will be on a first-come, first-served basis. As development occurs, SCWA will track service demands in relation to available supplies.

Table 11
Land Use and Water Demands at Buildout of the City of Rancho Cordova General Plan

Land Use [1]	Total Area (Acres)			Unit Water Demand Factor [2]	Water Demand (afy)		
	Corporate City Limits	Unincorporated City	Total Acreage Within Planning Area		Corporate City Limits	Unincorporated City	Total Planning Area Water Demands
Public/Quasi-Public	1,138	3,854	4,992	1.04	1,184	4,008	5,192
Parks and Open Space	2,392	1,810	4,202	3.46	8,276	6,263	14,539
Natural Resources	1,864	9,251	11,115	0.00	0	0	0
Rural Residential	0	1,135	1,135	1.33	0	1,510	1,510
Estate Residential	630	3,949	4,579	1.33	838	5,252	6,090
Low Density Residential	6,156	10,780	16,936	2.89	17,791	31,154	48,945
Medium Density Residential	3,423	266	3,689	3.70	12,665	984	13,649
High Density Residential	450	249	699	4.12	1,854	1,026	2,880
Residential Mixed Use	62	60	122	2.51	156	151	307
Office Mixed Use	1,788	1,118	2,906	2.75	4,917	3,075	7,992
Commercial Mixed Use	439	352	791	2.75	1,207	968	2,175
Village Center	222	225	447	2.51	557	565	1,122
Local Town Center	68	77	145	2.51	171	193	364
Regional Town Center	112	174	286	2.51	281	437	718
Transit Oriented Town Center	77	154	231	2.51	193	387	580
Light Industrial	961	2,940	3,901	2.71	2,604	7,967	10,571
Heavy Industrial	224	918	1,142	2.71	607	2,488	3,095
Surface Mining [3]	0	871	871	0.00	0	0	0
Developed Land Use	20,006	38,183	58,189		53,301	66,428	119,729
Water System Losses (7.5%)					3,998	4,982	8,980
Total Land and Water Use	**20,006**	**38,183**	**58,189**		**57,299**	**71,410**	**128,709**

Notes:
1 Land use designations and total acreage provided by Rancho Cordova correspond to the General Plan land use map.
2. Unit water demand factors based on Zone 40 WSMP (SCWA 2005a) for land use categories similar to City of Rancho Cordova land use categories. Demand factors reflect 25.6% level of water demand management consistent with the WFA.
3 Aggregate mining typically has a minimal water demand for wash-down and dust control.
Source: Angell, pers. comm., 2006

Table 12
Approved and Proposed Projects In Rancho Cordova

Project Name	Dwelling Units	Res. Acres	Com. Acres	Total Acres*
Approved Projects (all projects have secured water supplies)				
Sunridge Park (Phase I) - (Part of Sun Ridge Specific Plan[1])	801	244.2	NA	244.2
Anatolia I - (Part of Sun Ridge Specific Plan[1])	949	199.5	14.5	229.8
Anatolia II (Part of Sun Ridge Specific Plan[1])	886	244.7	11.1	298
Anatolia III (Part of Sun Ridge Specific Plan[1])	879	208	NA	208
Anatolia IV (Part of Sun Ridge Specific Plan[1])	134	25	NA	25
Mather East (Part of Sun Ridge Specific Plan[1])	NA	13.3	18.8	44.56
Sunrise Douglas Shopping Center	NA	NA	51	51
Villages of Zinfandel— Stone Creek Apartments	288	17.08	NA	17.08
Villages of Zinfandel GPA	719	527	18	823
North Douglas (Part of Sun Ridge Specific Plan[1])	680	120.9	NA	130.3
Capital Village[2]	836	85	32	117
Total	**6,172**	**1,685**	**145**	**2,188**
Proposed Projects				
Rio del Oro[3]	11,601	1,931	137	3,828.50
SunCreek[4]	5,459	2,901	306	3,410
The Preserve at Sunridge[1]	2,703	303.5	21.6	530
Sunridge East - (part of Sun Ridge Specific Plan[1])	3,042	393.6	25.7	609.4
Montelena - (part of Sun Ridge Specific Plan[1])	869	158.3	NA	251.9
Westborough[5]	6,000	1,000	274	1,518
Glenborough[5]	4,810	801	178	1,366
Bradshaw Landing[6]	NA	NA	NA	40.5
Legion of Christ Catholic College[6]	NA	NA	NA	300
Total	**34,484**	**7,488**	**942**	**11,854**
Total Approved and Proposed Projects	**40,656**	**9,173**	**1,087**	**14,042**

Notes:
1 Water supplies for these projects would be provided by the North Vineyard Wellfield operated by SCWA. See Section 5.2.1, "Sun Ridge Specific Plan Water Supply and Demand," below.
2 Water supplies identified for this project is unknown.
3 SCWA would provide replacement water supplies to this project (part of 15,000 afy of water diverted at FRWP.
4 SCWA would install and operate groundwater wells near Kiefer Road. Operation of these wells would remain within the negotiated sustainable yield of the Central Basin (i.e., 273,000 afy)
5 ~~GSWC would provide replacement water supplies~~ SCWA will wholesale remediated groundwater to GSWC to serve this project.
6 Water demands associated with these projects have not been identified

Table 13
SCWA Demand Areas and City Planning Areas

SCWA Demand Region	City of Rancho Cordova Planning Area
Mather Field	Mather Planning Area
Rio Del Oro - Cal American	Rio Del Oro Planning Area
Rio Del Oro - Zone 40	Rio Del Oro Planning Area
Sunrise Corridor	Sunrise Blvd South Planning Area
Sunrise Douglas	Suncreek/Preserve & Grant Line North Planning Area
Westborough	Westborough Planning Area

Note: Cal-Am = California-American Water Company; SCWA = Sacramento County Water Agency
Source: SCWA 2006

5.2.1 SUNRDIGE SPECIFIC PLAN WATER SUPPLY AND DEMAND

The Sun Ridge Specific Plan (SRSP) project was approved by the County Board of Supervisors in 2001 (City of Rancho Cordova was not incorporated at this time) (Sacramento County 2001a). The project consists of a land use plan for development of approximately 2,632-acres within the City's corporate limits with approximately 10,020 dwelling units, 173 acres of commercial uses, 78 acres of park uses, and 44 acres of school uses. Water supply planning for this project has been complicated and occurred within the context of the larger Sunrise Douglas Community Plan (SDCP). The SDCP project (also approved in 2001) provides an overall conceptual framework and policy direction for urbanization of approximately 6,042 acres within the City's corporate limits. Implementation of the SDCP and SRSP would result in the development of approximately 22,503 dwelling units and would support 479 acres of commercial, 177 acres of park and 148 acres of school uses. Buildout of the SRSP area is anticipated to occur by 2011, while buildout of the SDCP area would occur by approximately 2020.

The proposed SRSP was approved prior the implementation of SB 610 (became effective January 1, 2002), which is described above in Section 3.1.2, "Senate Bill 610." As such, the preparation of an SB 610 WSA was not required prior to approval of this project. Because the City is now the land use agency responsible for implementing specific development plans within the SRSP area and the City is engaging in the preparation of its General Plan and supporting General Plan water supply evaluation (this document), the City has asked for a description of the water supply sources identified for the SRSP and the long-term reliability of those sources to meet demands within the SRSP area during normal, dry, and multiple dry years. The discussion that follows describes SCWA's identified water supply sources to the SRSP area and the reliability of those supplies to meet demands based on the information contained in the Zone 41 UWMP.

SCWA would serve the SRSP area through their Zone 40 conjunctive use water supply system. Some of the specific development projects within the SRSP are identified in Table 12. Total water demands associated with the SRSP area are approximately 8,540 afy (approximately 7.62 mgd) (Sacramento County 2001a). SCWA has agreed to serve the SRSP area with groundwater from the NVWF,~~ which is currently under construction (see Section 3.3.2, "SCWA Zone 40 Water Supply Master Plan.") SCWA has adopted resolution (Resolution No. WA-0607 on July 26, 2005) that specifically allocates water supplies from the NVWF to the SRSP project (Appendix A)~~ the first phase of which is operational. Further, SCWA has accounted for the SRSP project within its UWMP (2005). The SCWA UWMP is discussed in Section 4, "Existing and Projected Water Demand and Supply for Water Purveyors in the City's Planning Area."

The NVWF provides for the extraction of up to 10,000 afy of groundwater and would consist of 8 wells located in the vicinity of Excelsior and Florin Roads and a 30-inch pipeline to convey raw groundwater to the Anatolia Water Treatment Plant (Anatolia WTP) located on Sunrise Boulevard. The total anticipated maximum day capacity of the well field would be approximately ~~8,000~~12,000 gpm. The first phase consists of 3 wells with a

capacity of 4,500 gpm (one of these wells is considered a back-up and not part of the treatment plant's capacity). Additional capacity and wells will be added on an as needed basis.

Water supplies (including the NVWF) to serve the SRSP are part of SCWA's conjunctive use program for Zone 40. Table 1 presents the combination of surface water and groundwater supplies and entitlements that SCWA has identified for Zone 40. Section 4.1.2, "SCWA Water Agreements," described the conditions associated with SCWA'S water agreements. Table 1 also describes SCWA'S projected water demands within its service area over the next 20+ years (to 2030). Further, through its UWMP, SCWA has demonstrated the long-term reliability of its water supplies to meet projected water demands within its service area. Because the SRSP project is located within zone 40, has been planned for in SCWA'S water supply planning, SCWA has determined through its UWMP that reliable water supplies are available to meet its 2030 projected water demand under normal, dry, and multiple-dry water years, and a defined water supply (i.e., NVWF) has been allocated to serve the SRSP area, adequate long-term water supplies are available to meet buildout water demands of the SRSP area.

5.3 AVAILABILITY OF SUPPLIES TO MEET PROJECTED DEMANDS WITHIN CITY OF RANCHO CORDOVA GENERAL PLAN PLANNING AREA

The water purveyors within the planning area have developed water supplies to meet demands associated with expected growth and development in their service areas. SCWA has projected water demands based on assumptions regarding population growth and unit water demands associated with different land use types. SCWA used the best available data and information for developing water demand estimates (i.e., Sacramento County General Plan), and other recent information obtained regarding new development in the area (e.g. the draft WSIP)

SCWA provides water to new developments on a first-come first-served basis. Specific projects that are planned for in the future would be served with water supplies as the necessary conveyance and treatment facilities to deliver water to the newly developing areas are developed. Facilities currently proposed by SCWA include the: Zone 40 ~~Central WTP~~Vineyard WTP, FRDP, NVWF, and the Eastern County Replacement Water Supply Project.

Using information provided by local water purveyors within the City's planning area, the total amount of 2030 water supplies for each water purveyor are presented in Table 14 and compared against existing and projected water demands for the City's planning area. Table 14 indicates that the combined water supplies of SCWA, GSWC and Cal-Am total approximately 77,620 AF in 2030.

Table 14
Summary of Projected 2030 Water Supply Available to Planning Area by Water Purveyors and City of Rancho Cordova Water Demands

Water Purveyor	Year	2030
SCWA Zone 40 NSA	Supply	37,314
GSWC	Supply	25,829
Cal-Am	Supply	14,477
Total Supply Available to Planning Area		**77,620**
City of Rancho Cordova General Plan Planning Area	Demands	
	City Area	57,299
	Non-City Area	71,410
	Total Demands	**128,709**
	Surplus/(Deficit)	(51,089)

The total water demands for the City's planning area would be approximately 57,299 AF with buildout of the corporate limits plus an additional 71,410 AF with buildout of the remaining planning area. Total water demands for the entire planning area (including the city limits) are 128,709 AF. Based on the combined available water supplies of the local purveyors to serve the planning area (i.e., 77,620 AF), there would be a water supply shortfall of approximately 51,089 AF (approximately 40% of the long-term total demands, considering development within the current city limits plus the planning area).

Because the majority of the City's corporate limit is located within GSWC's, Cal-Am's, or SCWA's NSA service areas and water supplies have been planned for buildout of these areas, adequate water supplies would likely be available to meet the City's corporate limit buildout water demands with implementation of the various water supply plans, agreements, and projects planned for by local water purveyors (described above) and assuming buildout occurs at the levels (e.g., densities) planned for by local purveyors . Beyond buildout of its corporate limits, new development projects would be served by SCWA and other purveyors (no other purveyors are located outside the City's corporate limits) on a first-come, first-served basis. While total supplies available (i.e., 77,620 AF) are greater than the City's corporate limit demands (i.e., 57,299 AF), indicating that additional growth beyond its corporate limits may be accommodated, the exact amount of water and corresponding land areas that could be served are currently unknown because SCWA would need to consider requests for service from the City in the context of all water demands throughout the Zone 40 service area. The City may be able to pursue additional growth beyond its corporate limits; however, the City would need to coordinate with SCWA to determine the total demands that could be met by existing and projected future water supplies.

If water supplies are not available to meet buildout water demands, the City would either need to stop approving new growth within its jurisdiction, or collaborate with regional water purveyors to investigate potential future water supply options in the context of the regional water supply planning environment. Investigation of future water supply options would likely require involvement from local water purveyors (GSWC, Cal-Am, and SCWA at a minimum, and other neighboring purveyors as appropriate), the Water Forum successor effort, and environmental groups. Because of the long-term and sometimes contentious nature of future water supply planning, the feasibility of implementing new water supply options beyond those described in the WFA are unknown. Regardless, the following section provides a brief summary of potential new water supply options the City could pursue (in collaboration with local agencies) to develop supplies to meet its planning area buildout water demands.

5.4 FUTURE WATER SUPPLIES

As shown in Exhibit 2, the portions of the City's planning area that are not within the corporate city limits are within SCWA's Zone 40. The portion southwest portion of the planning area that overlaps OHWD's service area is also within Zone 40's service area. To support the level of growth proposed by Rancho Cordova, additional water supplies would need to be acquired and/or the City would need to make efforts to substantially reduce its overall demand for potable water. There are a number of options in which water purveyors for the region could secure additional water supplies to accommodate the additional growth planned by the City. Reduction in potable water demand could be achieved through the use of recycled water for non-potable purposes. These options presented are considered very preliminary in nature. It is important to note that the City (as the land use agency) will need to actively participate in discussions with the local water purveyors, the Water Forum successor effort, and environmental groups to develop feasible solutions to providing new water supplies above and beyond those identified in the WFA and the necessary conveyance and treatment infrastructure to serve proposed growth and development. A combination of one or more of the potential options described below may allow the City to proceed with growth and development beyond its corporate limits.

5.4.1 WATER TRANSFERS AND EXCHANGES WITH NEARBY PURVEYORS

The water purveyors in the planning area (e.g., SCWA, GSWC, Cal-Am) could enter into agreements with nearby cities and agencies to secure new or surplus water supplies. Cities and agencies who purchase water from SCWA

or have jurisdictional boundaries that overlap ~~Zone 40's~~ the Planning Area ~~boundaries~~ would be a likely choice for developing such an agreement because the ability to develop distribution system interties. The interties would allow the easy transfer and exchange of water supplies between neighboring water purveyors without the need to construct substantial new conveyance infrastructure. The potential feasibility of water purveyors located near Rancho Cordova providing new water supplies to the City are discussed below.

CITY OF FOLSOM

GSWC has entered into an agreement with the City of Folsom to transfer 5,000 afy to the City of Folsom pursuant to its agreement for replacement water supplies with Aerojet. Within the agreement there is the option for the City of Folsom to transfer the 5,000 afy to the SCWA for its use within its conjunctive use water supply system. However, based in indications from the City of Folsom, the City does not anticipate the transfer of these supplies to SCWA would be likely. While Rancho Cordova could negotiate with the City of Folsom regarding the availability of these supplies, it is unlikely. ~~their ultimate transfer to SCWA would be unlikely.~~

PLACER COUNTY WATER AGENCY

Staff at the Placer County Water Agency was contacted to determine whether they had any available water supplies that could be exchanged or transferred to ~~SCWA~~water service providers in the Planning Area. Staff at Placer County Water Agency indicated that based on their Integrated Water Resources Plan, which is currently under preparation and was not available for review at the time this report was prepared, Placer County Water Agency would only have enough water supplies to meet its projected buildout water demands. No additional water supplies would be available from Placer County Water Agency for transfer or exchange agreements (Maisch, pers. comm., 2006).

SACRAMENTO SUBURBAN WATER DISTRICT

GSWC currently has an intertie with Sacramento Suburban Water District (SSWD)'s water distribution system. As of the date of this report, no reply has been received from SSWD regarding the potential availability of water transfer or exchange opportunities. The potential may exist for the acquisition of additional supplies to meet City demands; however, the City would need to coordinate with GSWC and SSWD to determine the feasibility of those supplies. If supplies are available, no substantial new infrastructure would need to be constructed because an intertie connection between these two agencies is already available. Additional distribution and treatment facilities may be required to convey the water from GSWC existing distribution to new growth areas to deliver these supplies ~~to SCWA~~ for distribution in the new growth areas.

NATOMAS CENTRAL MUTUAL WATER COMPANY

Natomas Central Mutual Water Company (Natomas Mutual) primarily provides irrigation water to its shareholders for agriculture purposes. Natomas Mutual has historically provided water to more than 33,200 acres of land north and west of the city limits of Sacramento and its service area is bordered on the west by the Sacramento River and stretches into Sutter County to the north. Natomas Mutual has water rights for 120,000 afy of water from the Bureau of Reclamation and diverts this water from the Sacramento River.

In March 2004, Natomas Mutual authorized its staff and consultants to finalize an operating agreement with GSWC to provide water and wastewater services to municipal and industrial users in the Natomas Basin via a separate conveyance system. (Natomas Central Mutual Water Company 2006). The partnership allows Natomas Mutual to serve all development within its service area, while preserving habitat, encouraging conservation, and maximizing the value of its shareholders' historic water rights. Just as important, the partnership with GSWC makes certain that the water Natomas draws from the Sacramento River, American River and from groundwater wells stays in northern California. As land is being converted from agricultural (predominantly rice) to residential land uses in Natomas Mutual's service area, the total water demands in the service area has decreased (rice

farming is a water intensive use). This has resulted in a potential surplus in Natomas Mutual's available water supplies.

Natomas Mutual has indicated that through the partnership with GSWC; they are looking for opportunities to market (e.g., sell, transfer) their surplus water supply (Strickland, pers. comm., 2006), although information regarding the specific amount of available water supplies is not available. The sale or transfer of water from Natomas Mutual to purveyors within Rancho Cordova would require approval by the State Water Resources Control Board, Division of Water Rights and the preparation of necessary environmental documentation. Further, additional conveyance and treatment facilities would likely be required to deliver water from Natomas Mutual's service area to the City's planning area.

5.4.2 IMPROVED GROUNDWATER SUSTAINABILITY

Groundwater use (i.e., by all groundwater users) in the Central Basin is restricted to the WFA, negotiated, long-term sustainable yield of 273,000 afy. The CSCGF is currently preparing a GMP that addresses ways to maintain groundwater sustainability (Eck, pers. comm., 2006). The CSCGF identified two primary activities that would result in an improved ability to sustain the viability of the groundwater resources for the Central Basin.

- Continue to investigate conjunctive use opportunities within the Central Basin area. SCWA and other groundwater users within the Central Basin will coordinate all recharge efforts.

- Continue to investigate opportunities for development of direct recharge facilities (e.g., well injection facilities) in addition to in-lieu recharge facilities (e.g., constructed recharge basins, discharge to riverbeds or streambeds).

The City could collaborate with SCWA and the CSCGF to investigate recharge and water banking opportunities available within the Central Basin. Through these investigations and implementation of a recharge program it could be determined that new supplies would be available to accommodate new growth within the region and these supplies could partially meet the City's projected water demands. The feasibility of implementing such a recharge program is currently under investigation by the CSCGF and would likely require the construction of additional facilities (e.g., groundwater injection wells, discharge structures, and new groundwater extraction wells if additional supplies are available).

Through investigation of the feasibility of large-scale groundwater recharge opportunities there may also be the potential opportunity to investigate and study the sensitivity of the negotiated, sustainable yield of the Central Basin. The City could coordinate with the Water Forum successor effort, CSCGF, and other groundwater appropriators to scientifically and comprehensively evaluate whether the Central Basin could support a higher yield what still maintaining the objectives of the WFA. Although dependant on the results of the investigation, it may be possible to pump additional groundwater from the Central Basin, which would facilitate new growth and development. A portion of these supplies could serve new growth within the City.

5.4.3 EXPAND USE OF RECYCLED WATER

Sacramento Regional County Sanitation District (SRCSD) is responsible for the collection, treatment, disposal and reuse (recycled water) of wastewater throughout most of the urbanized areas of Sacramento County, including the majority of service areas retailed water by SCWA.

Through an agreement between SCWA and SRCSD, the SRCSD has successfully implemented a 5 mgd (5,600 afy) Demonstration Water Recycling Program. This program provides recycled water for SRCSD on-site uses and for large commercial irrigation customers within ~~Zone 40~~portions of the City of Elk Grove (e.g., commercial, industrial, right-of-way landscaping, schools, and parks). Recycled water is a desirable source of water for outdoor landscape irrigation and other non-potable uses because of its high reliability and its independence of

hydrologic conditions in any given year. By increasing the use of recycled water SRCSD may be able to reduce the amount of treated wastewater discharged to the river which may become a more cost effective solution for the SRCSD's 1.1 million ratepayers as wastewater regulations require ever higher treatment standards (and costs) for discharged effluent. SRCSD's boundary covers ~~the Zone 40 region in the Rancho Cordova area~~most of the Planning Area. It is expected that the SRCSD's boundary will be expanded further to cover the areas in the City's planning area that are currently undeveloped as development plans are approved.

The most commonly used recycled water is defined as wastewater that has been treated to tertiary standards that meet Title 22 of the California Code of Regulations. Recycled water treated to this level can be used for all outdoor irrigation demands in a community, including; parks, schools, street medians, residential front and backyard landscaping, public open space, as well as industrial uses such as cooling water. In addition, recycled water is commonly used for environmental purposes such as wetlands and habitat restoration.

The ~~Demonstration~~ Water Recycling Program on the Sacramento Regional Water Treatment Plant site was designed and constructed to be ~~readily~~ expandable to 10 mgd (11,200 afy) in accordance with SRCSD's Master Reclamation Permit (WDR #97- 146). A planned Water Recycling Facility plant expansion from 5 mgd to 10 mgd could serve new areas of planned and expected growth and public open space and golf course areas within the City of Sacramento and the City of Elk Grove. SRCSD will work in partnership with SCWA to serve ~~these~~ those areas that are within Zone 40~~ areas~~. The expanded water recycling facility and new water recycling service areas will be called Phase II of the SRCSD Water Recycling Program. Phase II construction will be timed with the need for the higher capacity and is currently expected to be in service by 2008–2010.

To plan for water recycling projects beyond 2010, SRCSD is developing a Water Recycling Master Plan (WRMP) that would plan for water recycling through 2030. The overall project objective is to increase water recycling usage in the Sacramento region during peak irrigation months to a 30 mgd (33,600 afy) to 40 mgd (44,800 afy) level. Water recycling on this scale will allow SRCSD to better manage its effluent discharged to the Sacramento River and could help Sacramento Area water purveyors improve their water supply availability and reliability in terms of irrigation and industrial water supply. The WRMP effort will include significant outreach to stakeholders that could be associated with SRCSD's future water recycling plans. Stakeholders to be contacted during the WRMP are expected to include, among others; Sacramento Area water purveyors and users, land use planning authorities, land development leaders, and environmental interests. The WRMP will culminate in the development of a SRCSD Water Recycling Master Plan document that is expected to contain numerous water recycling project alternatives that will be evaluated for future SRCSD implementation.

One option being explored as part of the WRMP is the use of recycled water for agriculture which would supplement groundwater supplies. The reduction in groundwater use by agricultural users may "free up" groundwater supplies elsewhere in the same groundwater basin. This WRMP document is expected to be completed in mid-2006.

SCWA has indicated that the use of recycled water for non-potable purposes could reduce potable water demands by as much as 10% to 50% depending on the level of reuse that is prescribed (Eck, pers. comm., 2006). Using recycled water for public areas such as medians and park strips would reduce potable water demands by approximately 10-15%, while using recycled water for public area and residential outdoor areas (e.g. residential landscaping) could reduce overall potable water demands by as much as 50%.

The City should coordinate with the SRCSD to investigate the feasibility of implementing water recycling projects within its jurisdiction. Doing so over the long-term could substantially reduce the City's overall buildout water demands.

6 POTENTIAL ENVIRONMENTAL IMPACTS ASSOCIATED WITH DELIVERING WATER TO THE GENERAL PLAN PLANNING AREAS

This section briefly summarizes the potential environmental impacts associated with delivering water to the City's planning area. Potential impacts include those associated with construction and operation of facilities necessary for diverting, treating, and delivering water. Specific water supply sources to meet the City's build out planning area demands are not fully known. For those supplies that are not currently known, this assessment represents a preliminary overview of the types of impacts that could occur and would need to be addressed in detail in the future environmental documents prepared by the City or appropriate water agencies.

The City of Rancho Cordova is a land use agency and is responsible for the approval of new growth and development within its jurisdiction. In approving its General Plan and associated land use plan, the City would be approving a prescribed level of growth and development. The City must consider the direct and indirect impacts associated with approval of its General Plan, including the impacts associated with the provision of public services, such as a reliable water supply.

The population and employment growth associated with the City's proposed land use plans would cause an increase in local water demands. Demand for surface water and groundwater would increase as a result of new residential, commercial, and industrial development within Rancho Cordova; however, a portion of this demand may be reduced through the conversion of irrigated agricultural land to urban land uses. ~~Insufficient~~ W~~w~~ater supplies are currently available to meet the City's 2030 (corporate limits) but not the expanded ~~and~~ 2050 (planning area) land use demands. The City would be required to secure additional water supplies to meet its projected demands. Increased groundwater pumping to meet demands would be limited because little surplus groundwater is available for pumping over the long term because planned future groundwater pumping would approximate the negotiated groundwater pumping yield for the Central Basin (i.e., 273,000 afy). As a result, there would be an increased demand for new surface water supplies or increased recycling and water conservation programs and an increased demand for local water purveyors to expand their service areas. Increased surface water demands could lead to increased water shortages, reductions in existing service levels of local water purveyors, and the inability of purveyors to serve new development.

To meet projected demands, water supply purveyors would need to pursue additional water supply projects that would bring in new water supplies or recycled water supplies to serve the city. Potential projects to secure additional supplies could include the negotiation of new water right transfers; construction of new diversion structures; expansion or construction of new water treatment plants; and construction of new potable water and recycled water distribution facilities. Examples of potential environmental impacts that could be caused by potential water supply projects that would serve the City's planning area are described in Table 15.

Table 15
Examples of Types of Environmental Impacts that could be caused by Other New Water Supply Projects, Water Rights Transfers, and Related Infrastructure

Types of Potentially Affected Resources	Related and Potential Impacts
Surface Water Hydrology	Changes in the magnitude and timing of flows in affected streams; changes in the level of affected reservoirs and lakes. Potential cumulative effects on the hydrology of Folsom Reservoir, South Fork American River, Middle Fork American River, and possibly other locations including the North Fork Cosumnes River, and Alder and Weber Creeks.

Table 15 Examples of Types of Environmental Impacts that could be caused by Other New Water Supply Projects, Water Rights Transfers, and Related Infrastructure	
Types of Potentially Affected Resources	**Related and Potential Impacts**
Geology and Soils	Increase in erosion and sedimentation from construction activities; change in sediment transport in streams; geologic hazards could cause problems for new facilities and their operators if they are not sited carefully.
Water Quality	Changes in stream and reservoir/lake temperature, dissolved oxygen, turbidity, total suspended solids, and other water quality parameters of concern during construction and operation of new facilities.
Fishery Resources including Special-status Species	Change in the amount and quality of fishery habitat in affect streams and reservoirs/lakes, and potential fish entrainment at possible diversion sites in lakes and streams.
Wetlands and Riparian Habitat	Changes in the amount or functions and values of various types of wetlands from the construction of new facilities, or in riparian areas from changes in the operation of reservoir/lakes and changes in streamflows. Riparian habitat could be affected by hydrology changes or new construction and is especially important habitat for wildlife and botanical species.
Botanical Resources including Special-status Species	Disturbance to rare plants and their habitat and other types of vegetation from construction activities or changes in hydrology along streams and at reservoirs and lakes.
Wildlife Resources including Special-status Species	Changes in the amount and quality of affected wildlife habitat near affected reservoir/lakes, and streams and where appurtenant facilities would be located.
Recreation	Changes in the quantity or quality of recreation opportunities, including fishing, boating, hiking, and whitewater rafting affected reservoirs/lakes and in affected streams; some impacts could also occur during construction and operation of new conveyance, treatment, storage, and pumping facilities.
Visual Resources	Changes in reservoir/lake levels, and streamflows and the addition of new project facilities could affect the visual environment. New pipelines, pumping stations, or transmission lines near or in residential areas or highly visited areas would cause negative impacts.
Agriculture	Some irrigated land or grazing land could be taken out of production where project conveyance facilities need to be located and to accommodate growth. The availability of surface water supplies for agricultural uses could increase.
Cultural Resources	Historic, prehistoric, and ethnographic resources could be affected by hydrology changes or the construction and maintenance of new facilities.
Compatibility with Existing Land Uses and Other Policies and Plans	Some new project facilities may not be compatible with surrounding land uses, or may be inconsistent with related federal, state, tribal, and local plans and policies (including those of the U.S. Forest Service, USFWS, and California Department of Fish and Game).

Table 15 Examples of Types of Environmental Impacts that could be caused by Other New Water Supply Projects, Water Rights Transfers, and Related Infrastructure	
Types of Potentially Affected Resources	**Related and Potential Impacts**
Mineral Resources	New project facilities could interfere with the extraction of minerals at known or yet-to-be-discovered mineral sites.
Public Utilities	The routing and sitting of new project facilities could interfere with the operation or maintenance of existing or planned public utilities, including communication and energy infrastructure.
Socioeconomic Resources	Customers of the water purveyors and other would enjoy the socioeconomic benefits associated with a more reliable water supply and related economic growth. Water rates would likely increase to help pay for new facilities. Facility construction would cause short-term and Beneficial employment and income impacts. Energy or mineral impacts would also cause related socioeconomic effects.
Air Quality and Noise	Air emissions from construction equipment and traffic and loud noises could occur during the construction phase of new projects. New pumping stations would likely cause adverse noise impacts for nearby residents and recreationists.
Transportation	Local roads would experience traffic increases during construction.
Public Health and Safety	Construction activities could create some safety hazards.
Growth-inducing Effects	New system infrastructure and water supply projects would likely cause growth-inducing impacts.
Source: EDAW 2006	

6.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS IDENTIFIED IN RELEVANT WATER SUPPLY PLANNING PROJECTS

The WFA, SCWA's Zone 40 WSMP and the NVWF, evaluated as an element of the Sunrise Douglas Community Plan/Sunridge Specific Plan, which are described in Sections 3.3.1, 3.3.2, and 5.2.1 respectively all have certified EIRs that addressed the environmental impacts associated with delivery of water supply resources within the region. A brief summary of the significant and unavoidable environmental impacts identified in the EIRs for the WFA, Zone 40 WSMP, and NVWF is provided below.

6.1.1 WATER FORUM AGREEMENT EIR (CITY AND COUNTY OF SACRAMENTO 1999)

- **Water Supply:** Reduced Deliveries to SWP and CVP contractors.
- **Water Quality:** Seasonal Changes to Sacramento River and Delta water quality.
- **Fisheries:** Reductions in seasonal availability of reservoir littoral habitat for Folsom Reservoir's warmwater fisheries; flow-related impacts to fall-run Chinook salmon; flow and temperature-related impacts to splittail;

contribution to cumulative impacts to warmwater fisheries of Shasta and Trinity reservoirs; cumulative temperature-related impacts to Sacramento River fisheries resources; and cumulative flow-related impacts to Delta fish populations.

- **Power Supply.** Contribution to cumulative reduction in average annual average CVP hydropower capacity and generation.

- **Recreation.** Reduced rafting and boating opportunities on the Lower American River; reduced boating opportunities on Folsom Reservoir; and decreased late-season swimming breach opportunities at Folsom Reservoir.

- **Land Use and Growth-inducing Impacts:** Substantial growth-inducement and resultant land use impacts.

- **Cultural Resources:** Increased cycles of inundation and drawdown affecting cultural resources sites around Folsom Reservoir.

6.1.2 ZONE 40 WATER SUPPLY MASTER PLAN EIR (SCWA 2003)

- **Growth-Inducing Impacts:** Implementation of the 2002 Zone 40 WSMP would result in the removal of one obstacle to growth (water supply) in the 2030 Study Area. Growth would result in the conversion of undeveloped areas in the 2030 Study Area to urban land uses resulting in impacts on biological resources, scenic resources, air quality, noise, traffic, and other effects of increased urbanization. Because mitigation of growth-related effects is in the purview of the County and the cities of Elk Grove and Rancho Cordova through their existing land use authority, and because SCWA itself has no such authority, the 2002 Zone 40 WSMP cannot feasibly provide for additional mitigation of growth-related environmental impacts. This is a significant and unavoidable impact.

- **Conversion of Prime Farmland or Farmland of Statewide Importance:** The 2030 Study Area includes Prime Farmland and Farmland of Statewide Importance. Although specific locations of conveyance pipelines and groundwater facilities are not known at this time, construction of these facilities on designated farmland could result in an incremental loss of this resource. Also, as an indirect impact, farmland conversion could occur as a result of unknown development supported by the water supply plan.

- **Visual Impact of Project Facilities:** Depending on the size, location, and design of new facilities, significant visual impacts may occur with implementation of the 2002 Zone 40 WSMP. Once additional information becomes available, and specific projects are proposed, additional environmental analysis would be required to determine the magnitude of impacts, if any, that would result.

- **Short Term Construction-Related Emissions:** Short term construction generated emissions could potentially exceed SMAQMD daily emission thresholds of 85 ppd for NO_X and 275 ppd for fugitive dust (PM_{10}). As a result, short term construction generated air quality impacts would be significant and unavoidable.

- **Short-Term Construction-Generated Noise:** Construction activities associated with development of project facilities could exceed County noise thresholds at nearby noise-sensitive land uses. This would be a significant and unavoidable noise impact.

- **Stationary Source Noise:** Operation of proposed stationary noise sources could result in noise levels at nearby noise-sensitive receptors which could exceed County noise ordinance standards. This is a significant and unavoidable noise impact.

- **Special-Status Species:** A total of 8 special-status plants and 26 special-status wildlife species have been recorded, or have the potential to occur, in the vicinity of the 2030 Study Area. Construction and maintenance of project facilities could result in loss and/or disturbance of special-status plants and animals and their habitat. This is a significant and unavoidable impact.

- **Sensitive Habitats:** The 2030 Study Area and nearby locations support a number of several sensitive habitats. Construction and maintenance of project facilities could result in loss, alteration, and/or temporary disturbance of sensitive habitats. This is a significant and unavoidable impact.

- **Potential Impact on the South Sacramento Habitat Conservation Plan:** Construction of WSMP water facilities would facilitate development that could, in turn, result in the potential loss of important habitat areas inside the USB that are potentially critical components of the SSHCP. It is anticipated that the area in the UPA would be developed and thus that little or no habitat mitigation associated with the SSHCP would occur in the UPA. In addition, the 8,400 acres of land inside the 2030 Study Area (as analyzed in this EIR) but outside the UPA contains no resources critical to the success of the SSHCP. If land use authorities direct development of these 8,400 acres consistent with the 2030 Study Area, implementation of the Zone 40 WSMP would not significantly affect the SSHCP. However, at this point, it is unknown if land use authorities would direct development in the aforementioned 8,400-acre study area or would direct development elsewhere within the USB, which could potentially affect the viability of the SSHCP. As mitigation, SCWA will provide funding to facilitate and expedite completion of the SSHCP. However, because of the uncertainty of future land use decisions that could result in development of land outside the 2030 Study Area, this impact is potentially significant and unavoidable.

6.1.3 North Vineyard Well Field Element of the Sunrise Douglas Community Plan/Sunridge Specific Plan EIR (Sacramento County 2001b)

- No significant unavoidable adverse impacts associated with the North Vineyard Well Field were identified.

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