

Final
Environmental Impact Report/Environmental Impact Statement
Volume I
Rio del Oro Specific Plan Project
State Clearinghouse #2003122057



Volume IV

Prepared for:
City of Rancho Cordova
and
U.S. Army Corps of Engineers,
Sacramento District

Prepared by:
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June 24, 2010

AECOM

Final
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Rio del Oro Specific Plan Project
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Volume IV

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1 INTRODUCTION

This final environmental impact report/environmental impact statement (FEIR/FEIS) has been prepared to respond to comments received on the 2006 draft EIR/EIS (2006 DEIR/DEIS) and 2008 revised draft EIR/supplemental draft EIS (2008 RDEIR/SDEIS) for the Rio del Oro Specific Plan Project, which is a mixed-use development project proposed for implementation by Elliott Homes and GenCorp Realty Investments. The FEIR/FEIS has been prepared by the City of Rancho Cordova (City) and the U.S. Army Corps of Engineers (USACE), Sacramento District in accordance with the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The City is the lead agency under CEQA and USACE is the lead agency under NEPA.

On December 8, 2006, the City and USACE released the 2006 DEIR/DEIS for public review and comment for a 60-day period. The comment period closed on February 5, 2007. The 2006 DEIR/DEIS evaluated the potential environmental effects of the Proposed Project (Applicants' Preferred Alternative) and four alternatives: the High Density Alternative, the Impact Minimization Alternative, the No Federal Action Alternative (No Section 404 of the Clean Water Act Permit), and the No Project/No Action Alternative. A public hearing to receive public input on the 2006 DEIR/DEIS was held at Rancho Cordova City Hall on January 11, 2007. The public hearing was recorded and a transcript was made. Written comments were received from federal, state, and regional and local agencies, and from organizations and individuals; comments were also received during the public hearing. The City and USACE considered the comments received on the 2006 DEIR/DEIS.

The City and USACE subsequently determined that portions of the 2006 DEIR/DEIS should be recirculated and supplemented in accordance with CEQA and NEPA. CEQA requires recirculation of the DEIR when significant new information is added to an EIR after notice has been given and consultation has occurred but the EIR has not yet been certified (California Public Resources Code, Section 21092.1). Under NEPA, the Council on Environmental Quality (CEQ) requires a supplemental EIS when the NEPA lead agency makes substantial changes to the proposed action or significant new circumstances arise that are relevant to environmental concerns, or when the purposes of NEPA will be furthered by producing a supplemental EIS (40 Code of Federal Regulations [CFR] Section 1502.9[c]).

On April 15, 2008, the City and USACE released the 2008 RDEIR/SDEIS for public review and comment for an 85-day period. The 2008 RDEIR/SDEIS evaluated the potential environmental effects of the same five alternatives as evaluated in the 2006 DEIR/DEIS, but with specific revisions affecting water supply and biological resources. The 2008 RDEIR/SDEIS included a revised water supply evaluation that described the various water resources available to support the project. In addition, the 2008 RDEIR/SDEIS contained a revised biological resources section. A public hearing to receive public input on the 2008 RDEIR/SDEIS was held at Rancho Cordova City Hall on May 22, 2008. The City published two revised notices of availability: one on June 3, 2008 (which extended the comment period to June 20, 2008), and one on June 24, 2008 (which extended the public comment period to July 7, 2008). These extensions were provided at the request of Sacramento County Water Agency (SCWA), which requested additional time to review and comment on the 2008 RDEIR/SDEIS. Written comments were received during the public comment periods on the 2008 RDEIR/SDEIS, and comments were received during the public hearing.

The FEIR/FEIS consists of the entire 2006 DEIR/DEIS (Volumes I, II, and III) and 2008 RDEIR/SDEIS (a supplement to Volume I) and the comments, responses to comments, minor project modifications, and revisions to the 2006 DEIR/DEIS and 2008 RDEIR/SDEIS (Volume IV).

1.1 PURPOSE AND INTENDED USES OF THE FEIR/FEIS

Both CEQA and NEPA require a lead agency that has completed a DEIR or DEIS to consult with and obtain comments from public agencies (cooperating, responsible, and/or trustee agencies) that have legal jurisdiction

with respect to the proposed action, and to provide the general public with opportunities to comment on the DEIR or DEIS. The FEIR/FEIS is a mechanism for responding to these comments. This FEIR/FEIS has been prepared to respond to comments received from agencies, organizations, and members of the public on the 2006 DEIR/DEIS and 2008 RDEIR/SDEIS for the Rio del Oro Specific Plan Project, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the 2006 DEIR/DEIS and 2008 RDEIR/SDEIS, including minor project modifications, made in response to these comments and as a result of the applicants' ongoing planning efforts. The 2006 DEIR/DEIS, 2008 RDEIR/SDEIS, and this FEIR/FEIS will be used to support the City's decision whether to approve the project and USACE's decision to issue a record of decision (ROD).

The FEIR will also be used by CEQA responsible agencies, such as the Central Valley Regional Water Quality Control Board, and trustee agencies, such as the California Department of Fish and Game, to ensure that they have met the requirements of CEQA before deciding whether to issue discretionary permits and approvals for portions of the project over which they have authority. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the project or would issue permits and/or other regulatory approvals. The FEIS will be used by USACE to make decisions on whether to issue permits pursuant to Department of the Army Section 404 of the Clean Water Act and issue a ROD.

1.2 PROJECT LOCATION

The project site is located in eastern Sacramento County, south of U.S. Highway 50 (U.S. 50), within the Rancho Cordova city limits. The property is located south of White Rock Road, north of Douglas Road, and east of Sunrise Boulevard.

A large portion of the project site is currently being used for aggregate mining and as pastureland for cattle grazing. Surrounding land uses include facilities owned by Aerojet General Corporation (Aerojet) and associated buffer lands to the north; aggregate mining to the northeast; industrial development (the Security Park) to the southeast; industrial development along the Sunrise Boulevard corridor to the west; Mather Airport farther west; and new residential housing and agricultural land uses to the south. The County of Sacramento (County) Landfill is located southeast, and the Sunrise Douglas Community Plan/SunRidge Specific Plan (a developing mixed-use project) area is located immediately south of the Rio del Oro project site.

1.3 PROJECT BACKGROUND

Historical use of the project site includes grazing, gold mining, and activities associated with the aerospace industry. The project site forms a part of the historic 35,500-acre Mexican land grant Rancho Rio de los Americanos—lands that were used historically for grazing since the early 1800s. A large portion of the project site is still being used today as pastureland for cattle grazing. Beginning in the 1920s, most of the land in the project study area was acquired by the Natomas Company for bucket-line dredging of gold-bearing gravel deposits, which continued in the project vicinity through the early 1960s. The mining activities consisted of hydraulic dredging of ancient alluvial deposits to a depth of up to 120 feet. The areas that were mined are distinguished by alternating piles of rocky tailings and lower areas where the finer sediment settled out. Evidence of mining activities, including the piles of dredge tailings, covers approximately 70% of the surface area of the project site. Currently, a portion of the tailings is being processed for sand and gravel.

The project site was sold to Aerojet in 1956 for use in development and testing of missile propulsion systems. McDonnell Douglas Corporation (MDC) initially leased the land from Aerojet for its rocket testing activities, and then bought it outright in 1961. MDC ceased operations at the site in 1969; Aerojet reacquired the land in 1984 for use primarily as a buffer zone from White Rock Road for rocket engine testing, but also as a place to burn excess rocket fuel and test small quantities of energetic material. Limited development of the site during this time included construction of paved and unpaved access roads, various structures and buildings, and a limited

infrastructure of utilities and drainage improvements. Numerous buildings, roads, and structures associated with the prior use remain on the site today, primarily in the southern/central portion of the project site.

In 1994, Aerojet and MDC agreed to investigate certain areas of concern on the project site pursuant to the requirements of a consent order with the California Department of Toxic Substances Control (DTSC), and to complete necessary remediation of contaminated soil and groundwater (see Exhibits 3.13-1 and 3.13-2 in 2006 DEIR/DEIS Section 3.13, “Hazards and Hazardous Materials”).

As of the date of this writing, there are eight remaining DTSC areas of concern comprising approximately 460 acres. These areas of concern and the groundwater underneath the project site are undergoing various levels of review and/or remedial action. Some areas have been fully investigated, and DTSC has determined that several locations require no remedial action with regard to soil (see Section 3.13, “Hazards and Hazardous Materials”). Approved remedial-action plans are under way in some areas, while others are still in the investigation phase.

During the mid-1990s, while site evaluations were proceeding, Aerojet met with DTSC on numerous occasions to discuss long-range redevelopment plans for the property, including large passive buffer areas that were not utilized in either aerospace or industrial operations. In 1997, DTSC agreed with Aerojet that soils within much of the passive buffer area were indeed clean, should not be included within the consent order, and were suitable for potential redevelopment use. Currently, approximately 2,728 acres of the site are still under the consent order and are owned by GenCorp (parent company of Aerojet), while approximately 1,100 acres have been removed from the consent order and are owned by Elliott Homes.

On July 3, 1998, GenCorp submitted an application to the County for a general plan amendment and rezone on the 1,100 acres subsequently purchased by Elliott Homes in 2001. To accompany the private application, the County Board of Supervisors initiated a planning process for the Rio del Oro project. In addition, a technical advisory team was established, including representatives of various County departments or divisions, to review and comment on the proposed Rio del Oro project and the technical studies that would be needed to support the planning process.

In fall 2003, the City initiated the CEQA process for the proposed Rio del Oro Specific Plan project. Because implementation of the Proposed Project would require federal discretionary authorization and permits (Department of the Army under Section 404 of the Clean Water Act and Section 7 of the Federal Endangered Species Act [ESA]), the project is also subject to the requirements of NEPA. Therefore, the City and USACE initiated the process of preparing a joint EIR/EIS in fall 2003.

1.4 PROJECT PURPOSE AND NEED

The City and USACE each view the project purpose from the purview of their responsibilities. The City is interested in the orderly development of lands within its planning boundaries. USACE’s interest extends to its permit authority with respect to regulation of waters of the United States.

1.4.1 PROJECT PURPOSE AND NEED: CITY OF RANCHO CORDOVA CONSIDERATIONS

Elliott Homes and GenCorp (i.e., the project applicant[s]) are seeking various approvals necessary to develop the Rio del Oro project site, a 3,828-acre former mining and industrial property that is one of the largest undeveloped infill areas within Rancho Cordova, and a key area for focusing new development under the City General Plan. The proposed mix of land uses, with a predominance of housing but commercial and retail uses as well, is intended to help alleviate the City’s current jobs/housing imbalance, thereby reducing vehicle miles traveled, citywide congestion, and air pollution over the long term, while also providing sufficient tax revenues to avoid creating fiscal burdens on the newly incorporated City.

By locating a mix of housing types at an infill site south of the American River, an area of Rancho Cordova long planned for development, and proximate to major existing or planned infrastructure such as U.S. 50, light rail along the U.S. 50 corridor, and Section 7 of the Bradshaw Sewer Interceptor, the project would allow the City to reduce the trip distances currently traveled in and out of the Rancho Cordova area by locating residences proximate to existing and future job-generating uses. The current jobs/housing imbalance in the Rancho Cordova area currently adds a heavy traffic burden to the U.S. 50 corridor, American River bridges, and local roadways. The project would also contribute to regional growth management by focusing market demand for development onto an infill site that is both already highly disturbed and contiguous with existing development, thereby reducing long-term development pressures that would otherwise be felt in more environmentally sensitive areas less proximate to existing urban land uses.

The project would transform a site historically used for grazing, dredging and by Aerojet, a major aerospace company, into a mixed-use development. The site would also make an economically viable use of a significant portion of Aerojet's available buffer lands, which are currently zoned for industrial uses for which there is not currently an adequate market demand.

1.4.2 PROJECT PURPOSE AND NEED: U.S. ARMY CORPS OF ENGINEERS

USACE has determined that the overall project purpose and need are to provide a master-planned mixed-use development to serve the growing population of south-eastern Sacramento County.

1.5 RESOURCE AGENCY COORDINATION

The City of Rancho Cordova is the lead agency for the project under CEQA, and USACE, Sacramento District, is the federal lead agency under NEPA. The City has the principal responsibility for approving and carrying out the project and for ensuring that the requirements of CEQA have been met. USACE has the principal responsibility for making Clean Water Act Section 404 permit decisions and ensuring that the requirements of NEPA have been met.

The EIR/EIS analyzes, on both a project and program level, the environmental impacts of development of the Rio del Oro Specific Plan Project as described in the specific plan. The EIR/EIS analyzes the entitlements requested by the project applicants in their initial application as described in the 2006 DEIR/DEIS (see Section ES.4 in the Executive Summary and Section 1.6.1 in Chapter 1). Since the release of the 2006 DEIR/DEIS, the applicants have modified their current request to the City for entitlements and are pursuing a two-tier entitlement process (see the detailed discussion of the two-tier process in Chapter 2 of this FEIR/FEIS). The primary intent of the tiered entitlement process set forth in the GenCorp Tier 1 development agreement is to ensure, to the City's satisfaction, that the provisions of the Rio del Oro Specific Plan, the project's financing plan, and the phasing master plan are uniformly applied in the entire Specific Plan area, to both the GenCorp and Elliott Homes properties.

For first-tier entitlements for the project (Tier 1 entitlements), the project applicants would enter into two separate agreements with the City. The Tier 1 development agreement between the City and GenCorp would cover of portion of the 3,832-acre specific plan area. Concurrent with the approval of that development agreement, a second Tier 1 development agreement between the City and Elliott Homes, Inc., with near-identical terms, would processed and approved by the City for the remaining portion of the specific plan area. The applicants are requesting:

- ▶ adoption of the Rio del Oro Specific Plan,
- ▶ amendment to the Aerojet Special Planning Area, and
- ▶ approval of the Tier 1 development agreements between the City and the project applicants.

The City would also use this EIR/EIS for environmental review and approval of other future discretionary entitlements and permits after the adoption of the Rio del Oro Specific Plan.

Each of the applicants would request a second tier of entitlements (Tier 2 entitlements) that are required before any physical development of the project. Among these requested Tier 2 entitlements would be City approval of:

- ▶ a public facilities financing plan,
- ▶ a public facilities infrastructure and phasing plan,
- ▶ subdivision maps, and
- ▶ Tier 2 development agreements.

The City is not required to process the Tier 2 development agreements for GenCorp and Elliott Homes simultaneously. The project applicant that requests approval of its Tier 2 development agreement first would work with the City to prepare a single financing plan, phasing master plan, and set of master large-lot maps for the entire specific plan area. That applicant's development agreement would be approved at the same time as the plans and master large-lot maps. If Elliott Homes requests approval of its Tier 2 development agreement first, then the City may deny approval of the GenCorp Tier 2 development agreement and other Tier 2 entitlements for areas subject to the GenCorp Tier 1 development agreement unless GenCorp agrees to comply with the terms of the financing plan, phasing master plan, and master large-lot tentative map conditions of approval, as established by the City and Elliott Homes. The GenCorp Tier 2 development agreement would be approved at the same time as, but not before, the City approves the financing plan and phasing master plan for the entire Specific Plan area, and a large-lot tentative map for the GenCorp property (which would include the master conditions of approval to implement the Specific Plan, the financing plan, and the phasing master plan).

The proposed action represents a federal action because it would require one or more of the following federal permits and authorizations:

- ▶ Department of the Army permit under Section 404 of the Clean Water Act for discharges into waters of the United States, and
- ▶ ESA Section 7 consultation leading to issuance of a biological opinion and possible incidental-take statement for activities affecting endangered species.

1.6 SUMMARY DESCRIPTION OF THE PROJECT ALTERNATIVES

The State CEQA Guidelines (Section 15126.6) and the NEPA CEQ Regulations (40 CFR 15012.14) require that an EIR/EIS describe a range of reasonable alternatives to a proposed project that could feasibly attain the basic objectives of the project and avoid and/or lessen the environmental effects of the project. The analysis contained in the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS provides a comparative analysis between the proposed project/action (i.e., the Proposed Project/Proposed Action Alternative, hereinafter referred to as the "Proposed Project Alternative"), a High Density Alternative, and an Impact Minimization Alternative. The No Project Alternative (hereinafter referred to as the "No Project Alternative") as required under CEQA and NEPA and a No Federal Action Alternative as required by USACE under NEPA were also evaluated. A summary of the Proposed Project and the other four alternatives is provided below. Detailed information regarding the project design, operation, and specific components is contained in 2006 DEIR/DEIS Chapter 2, "Alternatives."

1.6.1 PROPOSED PROJECT ALTERNATIVE

The project applicants, Elliott Homes, Inc., and GenCorp, have requested certain minor modifications to the entitlement process for the Proposed Project Alternative described in the 2006 DEIR/DEIS. These minor modifications are described in Chapter 2 of this FEIR/FEIS. The applicants also have decided to request a two-tier entitlement process—Tier 1 and Tier 2 entitlements—as described in Section 1.4 and Chapter 2 of this FEIR/FEIS. However, the Proposed Project Alternative largely remains as described in the 2006 DEIR/DEIS. A

summary of the Proposed Project Alternative is provided below. A more detailed description is provided in the 2006 DEIR/DEIS, with the minor modifications described in Chapter 2 of this FEIR/FEIS.

The specific plan under the Proposed Project Alternative supports a combination of employment-generating uses, retail and supporting services, recreational uses, and a broad range of residential uses and associated infrastructure and roads on an approximately 3,828-acre site in eastern Sacramento County, south of U.S. 50, within the Rancho Cordova city limits.

The Proposed Project Alternative includes 11,601 residential units at various densities; employment-generating uses (village commercial, shopping center, business park, industrial park); public/quasi-public uses; elementary, middle, and high schools; community and neighborhood parks; private recreational uses; stormwater detention basins; open-space areas and open-space preserves; a drainage parkway; greenbelts; major roads with landscaping; and a wetland preserve/mitigation bank.

Several off-site infrastructure facilities (road widening and extensions, sewer interceptors, water and wastewater treatment facilities, wastewater transmission mains, water pipelines and distribution systems and facilities, electrical transmission lines, and water tanks) are proposed to serve project development and are evaluated in this EIR/EIS.

1.6.2 HIGH DENSITY ALTERNATIVE

This alternative was designed to further embrace the concept of “Smart Growth.” Under Smart Growth principles, areas that are planned for development are developed at higher densities. Although these higher densities may result in greater localized impacts on resources, the overall area of disturbance is reduced by concentrating development in particular locations. The High Density Alternative envisions a greater density of residential development on a footprint similar to that of the Proposed Project Alternative, resulting in more residential dwelling units per acre. The total acreage of residential development would be the same, but the density would be increased such that approximately 3,800 additional residential units would be constructed. The acreage of commercial and industrial development as well as the wetland preserve would be the same. The types of land uses would remain the same as under the Proposed Project Alternative.

1.6.3 IMPACT MINIMIZATION ALTERNATIVE

This alternative was formulated to reduce environmental impacts, while still meeting some of the project goals and objectives. Under the Impact Minimization Alternative, project components would be reconfigured on the project site so as to reduce impacts on waters of the United States, including wetlands and high-quality biological habitat. Under this alternative, the level of residential development would be decreased such that the amount of project-generated traffic, air quality emissions, and noise would be reduced. An additional 485 acres in the southern portion of the project site would be designated as part of the wetland preserve. Thus, a total of 994.5 acres, approximately 25% of the project site, would become a protected wetland preserve. The total acreage of residential development would be reduced by approximately 470 acres and approximately 1,040 fewer residential units would be constructed, although overall density would increase (a greater proportion of residential acreage would be developed with medium and high density). Commercial and industrial development sites would be reduced by approximately 30 acres.

1.6.4 NO FEDERAL ACTION ALTERNATIVE

This alternative was designed to allow some development of the project site while avoiding the placement of dredged or fill material into waters of the United States, thus eliminating the need for a USACE Section 404 permit. Development under this alternative incorporates a 50-foot avoidance buffer around jurisdictional wetlands. Under this alternative, 872 acres of the project site would be designated “Natural Resources” under the *Rancho Cordova General Plan*. Land with this use designation is set aside as natural habitat with no urban development. Open space trails would be located adjacent to areas designated as Natural Resources and the City

would prohibit public access into the area. The types of land uses would remain the same as under the Proposed Project Alternative.

1.6.5 NO PROJECT ALTERNATIVE

Under the No Project Alternative, the project would not be developed, and the majority of the project site would remain under the jurisdiction of the City. The No Project Alternative assumes that aggregate mining operations to remove portions of the existing dredge tailings at the project site would continue under existing Conditional Use Permits—one originally issued by the County of Sacramento (County), and the other issued by the City—and possibly under one or more future individual implementation permits expected to be issued by the City. Aggregate mining operations are not part of the Rio del Oro project. This is an unlikely long-term alternative for the Rio del Oro project site because, according to the *Rancho Cordova General Plan*, it is located in an area planned for urban development. Entitlements are actively being sought for development in the vicinity of the project site, and infrastructure planning is also occurring for the area. The No Project Alternative would not meet the purpose, need, or objectives of the proposed Rio del Oro project as described above.

1.7 CEQA AND NEPA REQUIREMENTS FOR RESPONDING TO COMMENTS

The State CEQA Guidelines state that written responses to comments received on the DEIR and RDEIR must describe the disposition of significant environmental issues. The response should contain good-faith, reasoned analysis to the environmental issues raised in the comment. In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed.

NEPA requires that the FEIS include and respond to all substantive comments received on the DEIS and SDEIS (40 CFR 1503.4). Lead agency responses may include the need to:

- ▶ modify the proposed action or alternatives;
- ▶ develop and evaluate new alternatives;
- ▶ supplement, improve, or modify the substantive environmental analyses;
- ▶ make factual corrections to the text, tables, or figures contained in the DEIS and SDEIS; or
- ▶ explain why no further response is necessary.

Additionally, the FEIS must discuss any responsible opposing view that was not adequately discussed in the DEIS and SDEIS and must indicate the lead agency's response to the issues raised.

1.8 REQUIREMENTS FOR DOCUMENT CERTIFICATION AND FUTURE STEPS IN PROJECT APPROVAL

This FEIR/FEIS is being distributed to agencies, stakeholder organizations, and individuals who commented on the 2006 DEIR/DEIS or the 2008 RDEIR/SDEIS. This distribution ensures that interested parties have an opportunity to express their views regarding the environmental impacts of the project, and to ensure that information pertinent to permits and approvals is provided to decision makers for the lead agencies, NEPA cooperating agencies, and CEQA responsible agencies. This document is available for review by the public during normal business hours at Rancho Cordova City Hall, 2729 Prospect Park Drive, Rancho Cordova, CA 95670, as well as on the City's Web site, <http://www.cityofranhocordova.org/>.

The NEPA FEIS will be available for public review for 30 days before the adoption of the ROD for the project's 404 permit. Written comments should be sent to the following address:

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The EIR is intended to be used by the Rancho Cordova City Council when considering approval of the Proposed Project or an alternative to the Proposed Project. The EIS is intended to be used by USACE in determining whether to issue the 404 permits.

Following completion of the FEIR/FEIS, the Rancho Cordova City Council will hold a public meeting to consider certification of the EIR and to decide whether or not to approve the Proposed Project or an alternative, at which time the public and interested agencies and organizations may comment on the project. A notice of determination (NOD) will then be filed. If the city council approves the Proposed Project (or an alternative), it will adopt written findings of fact for each significant environmental impact identified in the EIR; a statement of overriding considerations, if needed; and a mitigation monitoring and reporting program.

USACE will circulate the FEIS for a minimum of 30 days before taking action on the permit and issuing its ROD. The ROD will address the decision, alternatives considered, the environmentally superior alternative, relevant factors considered in the decision, and mitigation and monitoring.

Based on the available information, the No Project Alternative would have the fewest environmental impacts and therefore would be the environmentally superior alternative under CEQA. Under CEQA, if the No Project Alternative is determined to be environmentally superior, the EIR must also identify the environmentally superior alternative among the other alternatives. Thus, among the four action alternatives carried forward for analysis, the Impact Minimization Alternative would be the environmentally superior alternative under CEQA. Under NEPA, the environmentally superior alternative does not need to be identified until the ROD is issued; therefore, it is not identified in this FEIR/FEIS.

1.9 ORGANIZATION AND FORMAT OF THE FINAL EIR/EIS

This FEIR/FEIS is organized as follows:

- ▶ Chapter 1, "Introduction," describes the purpose and content of the FEIR/FEIS.
- ▶ Chapter 2, "Minor Modifications to the Proposed Project," presents a summary of modifications to the Proposed Project and the Rio del Oro Specific Plan that have occurred since the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS were circulated as a result of ongoing planning refinements.
- ▶ Chapter 3, "Master Responses," presents responses to significant environmental issues raised in multiple comments. These have been termed "master responses." They are organized by topic to provide a more comprehensive response than may be possible in responding to individual comments, and so that reviewers can readily locate all relevant information pertaining to an issue of concern.
- ▶ Chapter 4, "Comments and Individual Responses," contains a list of all agencies and persons who submitted comments on the 2006 DEIR/DEIS and 2008 RDEIR/SDEIS during the respective public review periods, copies of the comment letters submitted, cross references to relevant master responses, and individual responses to the comments that are not addressed in master responses.

- ▶ Chapter 5, “Revisions to the 2006 DEIR/EIS and the 2008 RDEIR/SDEIS,” presents corrections and other revisions to the text of the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS based on issues raised by comments, clarifications, corrections, or as a result of ongoing planning refinements. Changes in the text are signified by ~~strikeouts~~ where text is removed and by underline where text is added.
- ▶ Chapter 6, “References,” includes the references to documents used to support the comment responses.
- ▶ Chapter 7, “List of EIR/EIS Preparers,” lists the individuals who assisted in the preparation of this FEIR/FEIS.

The 2006 DEIR/DEIS consisted of three volumes. Volume I contained the EIR/EIS text, and Volumes II and III contained the technical appendices. The 2008 RDEIR/SDEIS was a supplement to Volume I. This document is Volume IV of the EIR/EIS. Together, the four volumes, along with the supplement to Volume I, constitute the FEIR/FEIS.

1.10 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1-1 summarizes the environmental impacts of the Proposed Project and alternatives under consideration, the level of significance of each impact before mitigation, recommended mitigation measures, and the level of significance of each impact after mitigation, as presented in the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS, and incorporating the revisions (with strikeouts and/or underline) shown in Chapter 5 of this FEIR/FEIS.

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.1 LAND USE					
Program Level					
Impact 3.1-1: Consistency with Sacramento County LAFCo Guidelines for Annexation of the Project Site to SRCSD and CSD-1	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.1-2: Compatibility with the Mather Airport Land Use Compatibility Plan	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.1-3: Conflict with the SACOG Sacramento Region Blueprint	No Direct, No Indirect	No Direct, No Indirect	Direct & Indirect SU	Direct & Indirect SU	Direct & Indirect SU
<p>IM, NF, NP: No feasible mitigation measures are available to reduce the conflict between the Impact Minimization, No Federal Action, and No Project Alternatives and the SACOG Preferred Blueprint Scenario to a less-than-significant level. The City would determine whether conflicts between the Impact Minimization, No Federal Action, and No Project Alternatives and Blueprint policies and assumptions may translate into potentially significant environmental effects. In determining whether any particular conflict translates into such an effect, the City would carefully consider whether implementation of the Impact Minimization, No Federal Action, or No Project Alternative, compared with implementation of a Blueprint-based plan, would yield either a lost opportunity to accomplish a long-term environmental benefit, or a lost opportunity to minimize a long term environmental impact (Public Resources Code Section 21001[g]). Therefore, this impact remains significant and unavoidable.</p> <p>PP, HD: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Project Level (Phase 1)					
Impact 3.1-4: Compatibility with Sacramento County LAFCo Guidelines for Annexation of the Project Site to SRCSD and CSD-1	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.1-5: Consistency with the Mather Airport Land Use Compatibility Plan	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.1-6: Conflict with the SACOG Sacramento Region Blueprint	No Direct, No Indirect	No Direct, No Indirect	Direct & Indirect SU	Direct & Indirect SU	Direct & Indirect SU
IM, NF, NP: For the same reasons as described for Impact 3.1-3 above, no feasible mitigation measures are available to reduce Impact 3.1-6 to a less-than-significant level under the Impact Minimization, No Federal Action, and No Project Alternatives. Refer to the mitigation discussion for Impact 3.1-3 for further discussion. This impact remains significant and unavoidable under the Impact Minimization, No Federal Action, and No Project Alternatives.					
PP, HD: No mitigation measures are required.					
Impact 3.1-7: Potential Land Use Conflict with California Department of Education Minimum Site Criteria for Siting the Proposed Elementary School	Direct impact may be SU, but no impact conclusion can be reached because additional studies are required; No Indirect				No Direct, No Indirect
PP, HD, IM, NF: No feasible mitigation measures can be identified at this time as discussed below.					
Because a conceptual site plan was developed and provided by FCUSD, details of this school were available to conduct a project-specific analysis. However, no other conceptual site plans for the remaining designated school sites are available. Despite the absence of a school district as lead agency, the DEIR/DEIS discusses the elementary school site (for which a conceptual site plan was provided) because the project applicant(s) and the City, in identifying school sites within the Rio del Oro Specific Plan area, have tried to be cognizant of school siting requirements and criteria. The intent of analyzing the proposed elementary school was not for FCUSD to rely solely on the Rio del Oro Specific Plan EIR/EIS for project-level review of Phase 1 schools. Rather, the analysis was intended to identify potential issues with CDE criteria early in the planning process and expedite FCUSD's preparation of its site-specific environmental review document. The same would be true for the proposed elementary schools, although without conceptual site plans it is difficult to conduct a project-level analysis.					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>The process for school site approval in California would also require DTSC and CDE to review the appropriate environmental documentation (for DTSC, the Phase I Environmental Site Assessment; for CDE, the DEIR/DEIS and applicable forms) to determine whether the proposed school site meets CDE siting criteria after their review. Often, CDE will require additional risk assessments as part of the site approval process; these risk assessments may identify portions of a site for which some types of use may be restricted to ensure student safety.</p> <p>In addition, DTSC could require FCUSD to conduct a PEA to identify specific risks and appropriate mitigation, based on the results of the Phase I Environmental Site Assessment. These additional levels of agency review and approval are outside the CEQA/National Environmental Policy Act (NEPA) process; although some of these determinations may take place before the EIR/EIS is certified, the process is separate and distinct from environmental review. CDE will not grant final site approval until site-level environmental review is completed.</p> <p>The risk assessments required under certain conditions may identify constraints within which the school district must work to obtain CDE approval of a site. If CDE requires additional assessments, the district would obtain and implement any identified mitigation to reduce risks or constraints at the site to an acceptable level as determined by CDE.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.1-8: Potential Land Use Conflict with California Department of Education Minimum Site Criteria for Siting the Proposed High School/Middle School</p>	<p>Direct impact may be SU, but no impact conclusion can be reached because additional studies are required; No Indirect</p> <p>No Direct, No Indirect</p>				
<p>PP, HD, IM, NF: No feasible mitigation measures can be identified at this time for the reasons described below.</p> <p>Because a conceptual site plan was developed and provided by FCUSD, details of this school were available to conduct a project-specific analysis. Despite the absence of a school district as lead agency, the DEIR/DEIS discusses the high school/middle school site because the project applicant(s) and the City, in identifying school sites within the Rio del Oro Specific Plan area, have tried to be cognizant of school siting requirements and criteria. The intent of analyzing the proposed high school/middle school was not for FCUSD to rely solely on the Rio del Oro Specific Plan EIR/EIS for project-level review of Phase 1 schools. Rather, the analysis was intended to identify potential issues with CDE criteria early in the planning process and expedite FCUSD's preparation of its site-specific environmental review document. The same would be true for the proposed elementary schools, although without conceptual site plans it is difficult to conduct a project-level analysis.</p> <p>The process for school site approval in California would also require DTSC and CDE to review the appropriate environmental documentation (for DTSC, the Phase I Environmental Site Assessment; for CDE, the DEIR/DEIS and applicable forms) to determine whether the proposed school site meets CDE siting criteria after their review. Often, CDE will require additional risk assessments as part of the site approval process; these risk assessments may identify portions of a site for which some types of use may be restricted to ensure student safety.</p> <p>In addition, DTSC could require FCUSD to conduct a PEA to identify specific risks and appropriate mitigation, based on the results of the Phase I Environmental Site Assessment. These additional levels of agency review and approval are outside the CEQA/NEPA process; although some of these determinations may take place before the EIR/EIS is certified, the process is separate and distinct from environmental review. CDE will not grant final site approval until site-level environmental review is completed.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>The risk assessments required under certain conditions may identify constraints within which the school district must work to obtain CDE approval of a site. If CDE requires additional assessments, the district would obtain and implement any identified mitigation to reduce risks or constraints at the site to an acceptable level as determined by CDE.</p> <p>NP: No mitigation measures are required.</p>					
3.2 POPULATION AND HOUSING					
Program Level					
<p>Impact 3.2-1: Temporary Increase in Population and Housing Demand during Construction</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	<p>Direct & LTS; indirect impacts are addressed in each issue area as direct impacts.</p>				<p>No Direct, No Indirect</p>
<p>Impact 3.2-2: Increased Population Growth</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	<p>Direct & LTS; indirect impacts are addressed in each issue area as direct impacts.</p>				<p>No Direct, No Indirect</p>
Project Level (Phase 1)					
<p>Impact 3.2-3: Temporary Increase in Population and Housing Demand during Construction of Development Phase 1</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	<p>Direct & LTS; indirect impacts are addressed in each issue area as direct impacts.</p>				<p>No Direct, No Indirect</p>
<p>Impact 3.2-4: Increased Population Growth</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	<p>Direct & LTS; indirect impacts are addressed in each issue area as direct impacts.</p>				<p>No Direct, No Indirect</p>

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.3 ENVIRONMENTAL JUSTICE					
Program Level					
Impact 3.3-1: Potential Effects on Low-Income Populations	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.3-2: Potential Effects on Minority Populations	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Project Level (Phase 1)					
Impact 3.3-3: Potential Effects on Low-Income Populations	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.3-4: Potential Effects on Minority Populations	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.4 DRAINAGE, HYDROLOGY, AND WATER QUALITY					
Program Level					
Impact 3.4-1: Potential Increased Risk of Flooding from Increased Stormwater Runoff	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.4-1: Prepare and Submit Final Drainage Plans and Implement Requirements. Before the approval of grading plans and building permits, the project applicant(s) for all project phases shall submit final drainage plans to the City demonstrating that off-site upstream runoff would be appropriately conveyed through the project site, and that project-related on-site runoff would be appropriately contained in detention basins to reduce flooding impacts. Furthermore, the project applicant(s) for all project phases may be required to participate in drainage improvements along Sunrise Boulevard; this will be determined through continuing consultation with the Sacramento County Department of Water Resources.</p> <p>Timing: Before approval of grading plans and building permits for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.4-2: Exposure of People or Structures to a Significant Risk of Flooding as a Result of the Failure of a Levee	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.4-3: Potential Temporary Construction-Related Drainage and Water Quality Effects	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.4-3: Implement Measures or Best Management Practices to Reduce Water Quality Effects of Temporary Construction Activities. Before the approval of grading permits and improvement plans, the project applicant(s) for all project phases shall consult with the City, the SWRCB, and the Central Valley RWQCB to acquire the appropriate regulatory approvals that may be necessary to obtain Section 401 water quality certification, an SWRCB statewide NPDES stormwater permit for general construction activity, and any other necessary site-specific WDRs or waivers under the Porter-Cologne Act. The project applicant(s) shall prepare and submit the appropriate NOIs and prepare the SWPPP and any other necessary engineering plans and specifications for pollution prevention and control. The SWPPP and other appropriate plans shall identify and specify:</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> ▶ the use of erosion and sediment-control BMPs, including construction techniques that will reduce the potential for runoff as well as other measures to be implemented during construction; ▶ the means of waste disposal; ▶ the implementation of approved local plans, nonstormwater-management controls, permanent postconstruction BMPs, and inspection and maintenance responsibilities; ▶ the pollutants that are likely to be used during construction that could be present in stormwater drainage and nonstormwater discharges, and other types of materials used for equipment operation; ▶ spill prevention and contingency measures, including measures to prevent or clean up spills of hazardous waste and of hazardous materials used for equipment operation, and emergency procedures for responding to spills; ▶ personnel training requirements and procedures that will be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP; and ▶ the appropriate personnel responsible for supervisory duties related to implementation of the SWPPP. <p>Where applicable, BMPs identified in the SWPPP shall be in place throughout all site work and construction and shall be used in all subsequent site development activities. BMPs may include such measures as the following:</p> <ul style="list-style-type: none"> ▶ Implementing temporary erosion-control measures in disturbed areas to minimize discharge of sediment into nearby drainage conveyances. These measures may include silt fences, staked straw bales or wattles, sediment/silt basins and traps, geofabric, sandbag dikes, and temporary vegetation. ▶ Establishing permanent vegetative cover to reduce erosion in areas disturbed by construction by slowing runoff velocities, trapping sediment, and enhancing filtration and transpiration. ▶ Using drainage swales, ditches, and earth dikes to control erosion and runoff by conveying surface runoff down sloping land, intercepting and diverting runoff to a watercourse or channel, preventing sheet flow over sloped surfaces, preventing runoff accumulation at the base of a grade, and avoiding flood damage along roadways and facility infrastructure. <p>All construction contractors shall retain a copy of the approved SWPPP on the construction site.</p> <p>Timing: Before approval of grading permits and improvement plans and throughout all site work and construction for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department, State Water Resources Control Board, and Central Valley Regional Water Quality Control Board.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.4-4: Long-Term Water Quality Effects from Urban Runoff</p> <p>Direct & LTS(m), No Indirect</p> <p>Direct & LTS(m), No Indirect</p> <p>Direct & LTS(m), No Indirect</p> <p>Direct & LTS(m), No Indirect</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.4-1.</p> <p>NP: No mitigation measures are required.</p>	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>Impact 3.4-5: Effects on Groundwater Recharge</p> <p>Direct & LTS, No Indirect</p> <p>Direct & LTS, No Indirect</p> <p>Direct & LTS, No Indirect</p> <p>Direct & LTS, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
Project Level (Phase 1)					
<p>Impact 3.4-6: Potential Increased Risk of Flooding from Increased Stormwater Runoff</p> <p>Direct & LTS(m), No Indirect</p> <p>Direct & LTS(m), No Indirect</p> <p>Direct & LTS(m), No Indirect</p> <p>Direct & LTS(m), No Indirect</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.4-1.</p> <p>NP: No mitigation measures are required.</p>	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>Impact 3.4-7: Exposure of People or Structures to a Significant Risk of Flooding as a Result of the Failure of a Levee</p> <p>Direct & LTS, No Indirect</p> <p>Direct & LTS, No Indirect</p> <p>Direct & LTS, No Indirect</p> <p>Direct & LTS, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>Impact 3.4-8: Potential Temporary Construction-Related Drainage and Water Quality Effects</p> <p>Direct & LTS(m), No Indirect</p> <p>Direct & LTS(m), No Indirect</p> <p>Direct & LTS(m), No Indirect</p> <p>Direct & LTS(m), No Indirect</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.4-3.</p> <p>NP: No mitigation measures are required.</p>	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.4-9: Long-Term Water Quality Effects of Urban Runoff	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.4-1.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.4-10: Effects on Groundwater Recharge	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
3.5 UTILITIES AND SERVICE SYSTEMS (Impacts 3.5-1 through 3.5-3 and Impact 3.5-11 through 3.5-13 are superseded by the 2008 RDEIR/SDEIS—see Table 1-2 below)					
Program Level					
3.5-1: Increased Demand for Initial Water Supplies and Infrastructure	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & SU, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: 3.5-1a: Submit Proof of Gap Water Availability and Implement On- and Off-Site Infrastructure Delivery System or Assure that Adequate Financing is Secured</p> <p>NF: Mitigation Measure 3.5-1b: Identify Alternative Water Supply Pipeline Alignments and Implement Measures to Mitigate Impacts.</p>					
3.5-2: Increased Demand for Permanent Water Supplies	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.5-3: Need for Permanent Water Facilities and Infrastructure	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	No Direct, No Indirect
<p>PP, HD, IM, NF: No further mitigation measures are required.</p> <p><i>[Note: Regarding indirect impacts, the environmental impacts of constructing facilities that would serve the Rio del Oro project were evaluated in the EIR for the 2002 Zone 40 Water Supply Master Plan prepared by SCWA (2004). Measures to mitigate environmental impacts were included in the EIR, which was certified and the master plan was approved. Certain impacts would remain significant and unavoidable even after mitigation measures were implemented.]</i></p> <p>NP: No mitigation measures are required.</p>					
Impact 3.5-4: Increased Demand for Interim Wastewater Conveyance Facilities	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.5-4: Submit Proof of Adequate Wastewater and Implement On- and Off-Site Infrastructure Service or Assure that Adequate Financing is Secured. Before the approval of building permits for all project phases, the project applicant(s) shall submit proof to the City that an adequate wastewater conveyance system either has been constructed or is assured through the use of bonds or other sureties to the City's satisfaction. Both on- and off-site wastewater conveyance infrastructure sufficient to provide adequate service to Rio del Oro subdivisions shall be in place before approval of the final map for all project phases, or their financing shall be assured to the satisfaction of the City.</p> <p>Timing: Before approval of <u>small-lot</u> final maps and building permits for all project phases.</p> <p>Enforcement: City of Rancho Cordova Building Department.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.5-5: Increased Demand for Permanent Wastewater Conveyance Facilities	No Direct, Indirect & SU(m)	No Direct, Indirect & SU(m)	No Direct, Indirect & SU(m)	No Direct, Indirect & SU(m)	No Direct, No Indirect
<p>PP, HD, IM, NF: No further mitigation measures are required.</p> <p><i>[Note: Regarding indirect impacts, the environmental impacts of constructing trunk and interceptor sewers that would serve the project were evaluated in the CSD-1 Sewerage Facilities Expansion Master Plan Final Environmental Impact Report (County of Sacramento 2004a) and the Sacramento Regional County Sanitation District Interceptor Master Plan 2000, Final Program Environmental Impact Report (County of Sacramento 2003). Mitigation measures to reduce environmental impacts were contained in these EIRs. Both EIRs were certified and the master plans were approved. Certain impacts would remain significant and unavoidable even after mitigation measures were implemented.]</i></p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.5-6: Increased Demand for Wastewater Treatment Plant Facilities	Direct & LTS(m), Indirect & SU(m)	Direct & LTS(m), Indirect & SU(m)	Direct & LTS(m), Indirect & SU(m)	Direct & LTS(m), Indirect & SU(m)	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.5-6: Demonstrate Adequate Wastewater Treatment Capacity. The project applicant(s) for all project phases shall demonstrate adequate capacity at the SRWTP for new wastewater flows generated by the project. This shall involve preparing a tentative map-level study and paying connection and capacity fees as identified by SRCSD and CSD-1. Approval of the final project map shall not be granted until the City verifies adequate SRWTP capacity.</p> <p>Timing: Before the approval of building permits for all project phases.</p> <p>Enforcement: City of Rancho Cordova Building and Safety and Public Works Departments.</p> <p><i>[Note: Regarding indirect impacts related to expansion of the SRWTP, implementation of mitigation measures to reduce air quality impacts is the responsibility of SRCSD. Such measures would be implemented in accordance with the certified SRWTP 2020 Master Plan Final EIR. Impacts on air quality would remain significant and unavoidable even with implementation of mitigation measures.]</i></p> <p>NP: No mitigation measures are required.</p>					
Impact 3.5-7: Increased Generation of Solid Waste	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.5-8: Increased Demand for Electricity and Infrastructure	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.5-9: Increased Demand for Natural Gas and Infrastructure	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.5-10: Increased Demand for Communications Service and Infrastructure	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Project Level (Phase 1)					
Impact 3.5-11: Increased Demand for Initial Water Supplies	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & SU, No Indirect	Impact 3.5-11: Increased Demand for Initial Water Supplies
PP, HD, IM: Implement Mitigation Measure 3.5-1(a)					
NF: Implement Mitigation Measure 3.5-1(b).					
NP: No mitigation measures are required.					
Impact 3.5-12: Increased Demand for Permanent Water Supplies	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Impact 3.5-12: Increased Demand for Permanent Water Supplies
PP, HD, IM, NF, NP: No mitigation measures are required.					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.5-13: Need for Permanent Water Facilities and Infrastructure	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Impact 3.5-13: Need for Permanent Water Facilities and Infrastructure
<p>PP, HD, IM, NF: No further mitigation measures are required.</p> <p><i>[Note: Regarding indirect impacts, the environmental impacts of constructing facilities that would serve the Rio del Oro project were evaluated in the EIR for the 2002 Zone 40 Water Supply Master Plan prepared by SCWA (2004). Measures to mitigate environmental impacts were included in the EIR, which was certified and the master plan was approved. Certain impacts would remain significant and unavoidable even after mitigation measures were implemented.]</i></p> <p>NP: No mitigation measures are required.</p>					
Impact 3.5-14: Increased Demand for Interim Wastewater Conveyance Facilities	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.5-4.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.5-15: Increased Demand for Permanent Wastewater Conveyance Facilities	No Direct, Indirect & SU(m)	No Direct, Indirect & SU(m)	No Direct, Indirect & SU(m)	No Direct, Indirect & SU(m)	No Direct, No Indirect
<p>PP, HD, IM, NF: No further mitigation measures are required.</p> <p><i>[Note: Regarding indirect impacts, the environmental impacts of constructing trunk and interceptor sewers that would serve the project were evaluated in the CSD-1 Sewerage Facilities Expansion Master Plan Final Environmental Impact Report (County of Sacramento 2004a) and the Sacramento Regional County Sanitation District Interceptor Master Plan 2000, Final Program Environmental Impact Report (County of Sacramento 2003). Mitigation measures to reduce environmental impacts were contained in these EIRs. Both EIRs were certified and the master plans were approved. Certain impacts would remain significant and unavoidable even after mitigation measures were implemented.]</i></p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.5-16: Increased Demand for Wastewater Treatment Facilities</p> <p>Direct & LTS(m), Indirect & SU(m)</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.5-6.</p> <p><i>[Note: Regarding indirect impacts related to expansion of the SRWTP, implementation of mitigation measures to reduce air quality impacts is the responsibility of SRCSD. Such measures would be implemented in accordance with the certified SRWTP 2020 Master Plan Final EIR. Impacts on air quality would remain significant and unavoidable even with implementation of mitigation measures.]</i></p> <p>NP: No mitigation measures are required.</p>	<p>Direct & LTS(m), Indirect & SU(m)</p>	<p>Direct & LTS(m), Indirect & SU(m)</p>	<p>Direct & LTS(m), Indirect & SU(m)</p>	<p>Direct & LTS(m), Indirect & SU(m)</p>	<p>No Direct, No Indirect</p>
<p>Impact 3.5-17: Increased Generation of Solid Waste.</p> <p>Direct & LTS, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>No Direct, No Indirect</p>
<p>Impact 3.5-18: Increased Demand for Electricity and Infrastructure</p> <p>Direct & LTS, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>No Direct, No Indirect</p>
<p>Impact 3.5-19: Increased Demand for Natural Gas and Infrastructure</p> <p>Direct & LTS, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>No Direct, No Indirect</p>
<p>Impact 3.5-20: Increased Demand for Communications Service and Infrastructure.</p> <p>Direct & LTS, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>No Direct, No Indirect</p>

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.6 PUBLIC SERVICES					
Program Level					
Impact 3.6-1: Temporary Obstruction of Roadways during Construction	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.6-1: Prepare and Implement Traffic Control Plans. The project applicant(s) and/or project contractor(s) for all project phases shall prepare and implement traffic control plans for construction activities that may affect road rights-of-way. The traffic control plans must follow standards of the agency responsible for the affected roadway and must be signed by a professional engineer. Measures typically used in traffic control plans include advertising of planned lane closures, warning signage, a flagperson to direct traffic flows when needed, and methods to ensure continued access by emergency vehicles. During project construction, access to existing land uses shall be maintained at all times, with detours used as necessary during road closures. Traffic control plans shall be submitted to the City Public Works Department for review and approval before the approval of all project plans or permits for all project phases where implementation may cause impacts on traffic.</p> <p>Timing: Before the approval of all relevant plans and/or permits <u>Before approval of grading, improvement, or construction plans and permits</u> and during construction for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.6-2: Increased Demand for Fire Protection Facilities, Systems, Equipment, and Services	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.6-2: Incorporate California Fire Code and SMFD Fire Prevention Standards into Project Design and Submit Project Design to SMFD for Review and Approval. The project applicant(s) for all project phases shall incorporate into their project designs fire flow requirements based on the California Fire Code, SMFD Fire Prevention Standard 441.1051, and other applicable requirements based on SMFD fire prevention standards. Approved plans showing access design shall be provided to SMFD as described by Fire Prevention Standard 444.302 (“Fire Apparatus Access Roads”). These plans shall describe access-road length, dimensions, and finished surfaces for firefighting equipment.</p> <p>Improvement plans showing hydrant locations shall be submitted to the SMFD Fire Prevention Bureau for review and approval. Fire hydrant details and SMFD notes shall be shown on the plans or improvement drawings as detailed in Fire Prevention Standard 441.1051. A letter from the Sacramento County Water Agency shall be obtained verifying that adequate water is available for fire flow.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>In addition, as required by the City General Plan, new commercial and industrial development, as well as multifamily residential development with five or more units must incorporate on-site fire suppression systems into project designs.</p> <p>If security gates are installed at the project site, the project applicant(s) shall obtain a copy of the County Fire Code, Amendment VII, “Emergency Access Gates and Barriers.” The design of the entry shall conform to this standard.</p> <p>The City shall not authorize the occupancy of any structures until the project applicant(s) have obtained a Certificate of Release (Standard 441.105, “Certificate of Release—Residential”) from SMFD verifying that all fire prevention items have been addressed on-site to the satisfaction of SMFD.</p> <p>Timing: Before approval of improvement plans and issuance of occupancy permits or final inspections for all project phases.</p> <p>Enforcement: Sacramento Metropolitan Fire District and City of Rancho Cordova Building and Safety Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.6-3: Increased Demand for Fire Flow</p>	<p>Direct & LTS(m), No Indirect</p>	<p>Direct & LTS(m), No Indirect</p>	<p>Direct & LTS(m), No Indirect</p>	<p>Direct & LTS(m), No Indirect</p>	<p>No Direct, No Indirect</p>
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.6-2.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.6-4: Increased Demand for Police Protection Facilities, Services, and Equipment</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>No Direct, No Indirect</p>
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
<p>Impact 3.6-5: Increased Demand for Public Elementary School Facilities and Services</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>No Direct, No Indirect</p>
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.6-6: Increased Demand for Public Middle School and High School Facilities and Services	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Project Level (Phase 1)					
Impact 3.6-7: Temporary Obstruction of Roadways during Construction	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
PP, HD, IM, NF: Implement Mitigation Measure 3.6-1. NP: No mitigation measures are required.					
Impact 3.6-8: Increased Demand for Fire Protection Facilities, Systems, Equipment, and Services	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
PP, HD, IM, NF: Implement Mitigation Measure 3.6-2. NP: No mitigation measures are required.					
Impact 3.6-9: Increased Demand for Fire Flow	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
PP, HD, IM, NF: Implement Mitigation Measure 3.6-2. NP: No mitigation measures are required.					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.6-10: Increased Demand for Police Protection Facilities, Services, and Equipment	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.6-11: Increased Demand for Public Elementary School Facilities and Services	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.6-12: Increased Demand for Public Middle School and High School Facilities and Services	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
3.7 GEOLOGY, SOILS, AND MINERAL RESOURCES					
Program Level					
Impact 3.7-1: Potential Temporary, Short-Term Construction-Related Erosion	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
PP, HD, IM, NF: Mitigation Measure 3.7-1: Prepare and Implement a Grading and Erosion Control Plan. A grading and erosion control plan shall be prepared by a California Registered Civil Engineer retained by the project applicant(s) for all project phases. The grading and erosion control plan shall be submitted to the City Public Works Department before issuance of grading permits for all new development within the project site. The plan shall be consistent with the City's Land Grading and Erosion Control Ordinance as well as the City's National Pollutant Discharge Elimination System (NPDES) permit and shall include the site-specific grading associated with development for all project phases. The plan shall include the location, implementation schedule, and maintenance schedule of all erosion and sediment control measures, a description of measures designed to control dust and stabilize the construction-site road and entrance, and a description of the location and methods of storage and disposal of construction materials. Erosion and sediment control measures could include the use of detention basins, berms, swales, wattles, and silt fencing. Stabilization of construction entrances to minimize trackout (control dust) is commonly achieved by installing filter fabric and crushed rock to a depth of approximately 1 foot. The project applicant(s) shall ensure that the construction contractor is responsible for securing a source					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>of transportation and deposition of excavated materials.</p> <p>Implementation of Mitigation Measure 3.4-3 (discussed in Section 3.4, “Drainage, Hydrology, and Water Quality”) will help reduce erosion-related impacts.</p> <p>Timing: Before the issuance of grading permits for all project phases, and throughout project construction.</p> <p>Enforcement: City of Rancho Cordova Public Works, Building and Safety, and Planning Departments.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.7-2: Potential Damage to Structures from Seismic Activity and Related Geologic Hazards</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>Direct & LTS, No Indirect</p>	<p>No Direct, No Indirect</p>
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
<p>Impact 3.7-3: Potential Damage to Structures from Construction on Unstable Soils</p>	<p>No Direct, Indirect & LTS(m)</p>	<p>No Direct, Indirect & LTS(m)</p>	<p>No Direct, Indirect & LTS(m)</p>	<p>No Direct, Indirect & LTS(m)</p>	<p>No Direct, No Indirect</p>
<p>PP, HD, IM, NF: Mitigation Measure 3.7-3a: Prepare a Geotechnical Study and Implement All Applicable Recommendations. Before the approval of grading plans for all project phases, a final geotechnical subsurface investigation report shall be prepared by the project applicant(s) for the proposed development and shall be submitted to the City. The final geotechnical engineering report shall address and make recommendations on the following:</p> <ul style="list-style-type: none"> ▶ site preparation; ▶ appropriate sources and types of fill; ▶ potential need for soil amendments; ▶ road, pavement, and parking areas; ▶ structural foundations, including retaining wall design; ▶ grading practices; ▶ erosion/winterization; ▶ special problems discovered on-site (e.g., groundwater and expansive/unstable soils); and ▶ slope stability. 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>The geotechnical investigation shall include subsurface testing of soil and groundwater conditions and determine appropriate foundation designs that are consistent with the CBC. If the soils report indicates the presence of critically expansive soils or other soil problems that would lead to structural defect if not corrected, additional investigations may be required for subdivisions before building permits are issued. This shall be so noted on the project grading plans. Recommendations contained in the geotechnical engineering report shall be noted on the grading plans and implemented as appropriate before the issuance of building permits. Design and construction of all new development in all phases of the project shall be in accordance with the CBC and the City Land Grading and Erosion Control Ordinance. It is the responsibility of the project applicant(s) to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report.</p> <p>Timing: Before the approval of grading plans for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p> <p>NP: No mitigation measures are required.</p> <p>PP, HD, IM, NF: Mitigation Measure 3.7-3b: Ensure On-Site Monitoring by a Geotechnical Engineer. All earthwork shall be monitored by a geotechnical engineer retained by the project applicant(s) for all project phases. The geotechnical engineer shall provide oversight during all excavation, placement of fill, and disposal of materials removed from and deposited on the subject site and other sites. Before export/import of any soil to/from an off-site location, the project applicant(s) shall obtain a grading permit from the City Public Works Department.</p> <p>Timing: Before issuance of grading permit and during construction activities for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.7-4: Loss of Mineral Resources	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, & Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Project Level (Phase 1)					
Impact 3.7-5: Potential Temporary Short-Term Construction-Related Erosion	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.7-1 and Mitigation Measure 3.4-3.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.7-6: Potential Damage to Structures from Seismic Activity and Related Ground Failure	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.7-7: Potential Damage to Structures from Construction on Expansive Soils	No Direct, Indirect & LTS(m)	No Direct, Indirect & LTS(m)	No Direct, Indirect & LTS(m)	No Direct, Indirect & LTS(m)	No Direct, No Indirect
PP, HD, IM, NF: Implement Mitigation Measures 3.7-3a and 3.7-3b. NP: No mitigation measures are required.					
Impact 3.7-8: Loss of Mineral Resources	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, & Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
3.8 PALEONTOLOGICAL RESOURCES					
Program Level					
Impact 3.8-1: Potential Disturbance of Previously Unknown Paleontological Resources During Earthmoving Activities	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Project Level (Phase 1)					
Impact 3.8-2: Potential Disturbance of Previously Unknown Paleontological Resources During Earthmoving Activities	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
3.9 CULTURAL RESOURCES					
Program Level					
Impact 3.9-1: Loss or Damage to Recorded Cultural Resource Sites	No Direct, Indirect & LTS	No Direct, Indirect & LTS	No Direct, Indirect & LTS	No Direct, Indirect & LTS	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.9-2: Loss of or Damage to Historic Sites, Buildings, and Structures	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.9-2: Record Eligible Historic Resources to Historic American Building Survey Standards and on Appropriate State Forms. If the Solid Propellant Assembly Area and the Sigma Test Area structures and their earthen berms must be demolished for project implementation, built elements of the eligible districts shall be documented by the project applicant(s) according to Historic American Building Survey (HABS) standards and recorded as cultural resources on California Department of Parks and Recreation (State Parks) Series 523 Primary and Archaeological Site records, and other appropriate forms from State Parks. The project applicant(s) shall have this documentation completed before approval of demolition permits for any of the historic structures or features.</p> <p>Timing: Before approval of demolition permits for the historic structures.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.9-3: Potential Damage to As-Yet-Undiscovered Prehistoric Sites or Native American Burials	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.9-3: Provide Preconstruction Worker Education and Stop Potentially Damaging Work if Human Remains are Uncovered during Construction. Before initiation of construction or ground-disturbing activities associated with the project, the project applicant(s) for all project phases shall require all construction personnel to be alerted to the possibility of buried cultural resources. The general contractor and its supervisory staff shall be responsible for monitoring the construction project for disturbance of cultural resources. Should any cultural resources, such as structural features, unusual amounts of bone or shell, artifacts, human remains, or architectural remains be encountered during any development activities, work shall be suspended and the City shall be notified immediately. The project applicant(s) shall retain a City-approved qualified archaeologist who shall conduct a field investigation of the specific site and recommend mitigation deemed necessary for the protection or recovery of any cultural resource concluded by the archaeologist to represent historical resources or unique archaeological resources. The City shall be responsible for approval of recommended mitigation if it is determined by the City to be feasible in light of approved land uses. The project applicant(s) shall implement the approved mitigation before the resumption of construction activities at the construction site.</p> <p>In accordance with the California Health and Safety Code, if human remains are uncovered during construction at the project site, work within 50 feet of the remains shall be suspended immediately, and the City and the County Coroner shall be notified immediately. If the remains are determined by the County Coroner to be Native American, the NAHC shall be notified within 24 hours of that determination (Health and Safety Code Section 7050[c]), and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The NAHC will then assign a Most Likely Descendant (MLD) to serve as the main point of Native American contact and consultation. Following the coroner’s findings, the MLD and the archaeologist shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The project applicant(s) shall be required to implement any feasible, timely-formulated mitigation deemed necessary for the protection of the burial remains. Construction work in the vicinity of the burials shall not resume until the mitigation is completed.</p> <p>This measure shall be included in all grading and improvement plans for all project phases.</p> <p>Timing: Before the approval of grading plans and during all ground-disturbing activities for all project phases.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
Project Level (Phase 1)					
Impact 3.9-4: Loss of or Damage to Recorded Cultural Resource Sites	No Direct, Indirect & LTS	No Direct, Indirect & LTS	No Direct, Indirect & LTS	No Direct, Indirect & LTS	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.9-5: Loss of or Damage to Historic Sites, Buildings, and Structures	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.9-6: Potential Damage to As-Yet-Undiscovered Prehistoric Sites or Native American Burials	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.9-6: Monitor Construction in Culturally Sensitive Areas and Stop Potentially Damaging Work if Archaeological Sites or Human Remains are Uncovered during Construction. Because areas of increased cultural sensitivity have been identified as a result of Native American contacts, the project applicant(s) of Phase 1 shall retain a City-approved qualified professional archaeologist to provide on-site monitoring during construction activities in these sensitive areas, as depicted in Exhibit 3.9-1. If the archaeologist notes unusual amounts of bone, stone, shell, burned soils, or other possible indications of buried archaeological resources, construction in the vicinity shall be halted until the find can be assessed. The archaeologist shall conduct a field investigation of the specific site and shall recommend mitigation deemed necessary for the protection or recovery of any cultural resource concluded by the archaeologist to represent historical resources or unique archaeological resources. The City shall be responsible for approval of recommended mitigation if it is determined by the City to be feasible in light of approved land uses. The project applicant(s) shall implement the approved mitigation before the resumption of construction activities at the construction site.</p> <p>In accordance with the California Health and Safety Code, if human remains are uncovered during construction at the project site, work within 50 feet of the remains shall be suspended immediately, and the City and the County Coroner shall be notified immediately. If the remains are determined by the County Coroner to be Native American, the NAHC shall be notified within 24 hours of that determination (Health and Safety Code Section 7050[c]), and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The NAHC will then assign an MLD to serve as the main point of Native American contact and consultation. Following the coroner’s findings, the MLD and the archaeologist shall determine the ultimate treatment and disposition of the remains and shall take appropriate steps to ensure that additional human interments are not disturbed. The project applicant(s) of Phase 1 shall be required to implement any feasible, timely-formulated mitigation deemed necessary for the protection of the burial remains. Construction work in the vicinity of the burials shall not resume until the mitigation is completed.</p> <p>Implementation of Mitigation Measure 3.9-3 discussed above will help reduce potential impacts to cultural resources.</p> <p>Timing: Before the approval of grading plans and during all ground-disturbing activities in the sensitive areas of development Phase 1.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.10 BIOLOGICAL RESOURCES (Project Level for the Entire Site) (Superseded by text in 2008 RDEIR/SDEIS—see Table 1-2 below)					
3.10-1: Loss and Degradation of Jurisdictional Wetlands and Other Waters of the United States, and Waters of the State	Direct & LTS(m), Indirect & SU(m)	Direct & LTS(m), Indirect & SU(m)	Direct & LTS(m), Indirect & SU(m)	Direct & LTS(m), Indirect & SU(m)	No Direct, No Indirect
<p>PP, HD, IM, NF: 3.10-1a: Secure Clean Water Act Section 404 Permit and Implement All Permit Conditions, and Ensure No Net Loss of Wetlands, Other Waters of the United States, and Associated Functions and Values</p> <p>NP: No mitigation measures are required.</p> <p>PP, HD, IM, NF: 3.10-1b: Include in Drainage Plans All Wetlands that Remain On Site</p> <p>NP: No mitigation measures are required.</p>					
3.10-2: Loss and Degradation of Sensitive Natural Communities	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & LTS(m), Indirect SU(m)	Direct & Indirect LTS	No Direct, No Indirect
<p>PP, HD, IM: 3.10-2a: Secure and Implement Section 1602 Streambed Alteration Agreement</p> <p>NF: No mitigation measures are required because the No Federal Action Alternative would not result in alteration to the bed or bank of Morrison Creek. Therefore, a Streambed Alteration Agreement from DFG would not be needed as it would under the action alternatives.</p> <p>NP: No mitigation measures are required.</p> <p>PP, HD, IM: 3.10-2b: Preserve, Restore, or Create Riparian Habitat at Satisfactory Ratio to Fulfill Local Planning Framework Requirements</p> <p>NF: No mitigation measures are required because the No Federal Action Alternative would not result in adverse effects on riparian habitat in addition to those habitats protected and addressed under City policy.</p> <p>NP: No mitigation measures are required.</p>					
3.10-3: Loss of Oak Woodland and Individual Oak Trees	Direct and Indirect LTS(m), No	Direct and Indirect LTS(m), No	Direct and Indirect LTS(m), No	Direct and Indirect LTS(m), No	No Direct, No Indirect
PP, HD, IM, NF: Perform Tree Survey and Avoid or Replace Native Oak Trees and Other Native Trees Scattered Throughout the Project Site					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
NP: No mitigation measures are required.					
3.10-4: Loss and Degradation of Habitat for Special-Status Wildlife	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	No-Direct, No-Indirect
PP, HD, IM, NF: 3.10-4a: Secure Take Authorization for Federally Listed Vernal Pool Invertebrates and Implement Permit Conditions					
NP: No mitigation measures are required.					
PP, HD, IM: Implement Mitigation Measures 3.10-1a and 3.10-1b.					
NF, NP: No mitigation measures are required.					
PP, HD, IM, NF: 3.10-4b: Obtain Incidental Take Permit for Impacts on Valley Elderberry Longhorn Beetle					
NP: No mitigation measures are required.					
PP, HD, IM, NF 3.10-4c: Conduct Preconstruction Surveys for Nesting Raptors and, if Found, Establish Appropriate Buffers					
NP: No mitigation measures are required.					
PP, HD, IM, NF: 3.10-4d: Prepare and Implement a Swainson's Hawk Mitigation Plan					
NP: No mitigation measures are required.					
3.10-5: Loss and Degradation of Special-Status Plants and Habitat for Potential Special-Status Plants	Direct & Indirect LTS(m)	Direct & Indirect LTS(m)	Direct & Indirect LTS(m)	No-Direct, No-Indirect	No-Direct, No-Indirect
PP, HD, IM: Incorporate Measures to Protect Greene's Legenere in the Mitigation and Monitoring Plan					
NF, NP: No mitigation measures are required.					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Cumulative					
3.10-6: Cumulative Biological Resources Impacts	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Impacts would result from related projects but not from the Rio del Oro project.
<p>PP, HD, IM, NF: Implement Mitigation Measures 3.10-1a, 3.10-1b, 3.10-2a, 3.10-2b, 3.10-3, 3.10-4a, 3.10-4b, 3.10-4c, 3.10-4d, and 3.10-5.</p> <p>NP: No mitigation measures are required.</p>					
3.11 VISUAL RESOURCES					
Program Level					
Impact 3.11-1: Alteration of a Scenic Vista	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.11-2: Damage to Scenic Resources within a State Scenic Highway	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.11-3: Degradation of Visual Character	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.11-3: Require Development to Conform to City General Plan Design Guidelines. The project applicant(s) for all project phases shall include design, architectural, development, and maintenance standards in the Rio del Oro Specific Plan that will ensure minimization of impacts on the existing visual character of the site. Though this process the project applicant(s) shall ensure that urban development at the project site is substantially consistent with the Design Guidelines adopted as part of the City General Plan.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>OR</p> <p>Before the approval of building permits, all structures and facilities shall adhere to the City's design review process.</p> <p>Timing: Before approval of building permits for all structures within all project phases.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.11-4: Temporary Degradation of Visual Character for Developed Project Land Uses Caused by Construction Staging Areas</p>	<p>Direct & SU(m), No Indirect</p>	<p>Direct & SU(m), No Indirect</p>	<p>Direct & SU(m), No Indirect</p>	<p>Direct & SU(m), No Indirect</p>	<p>No Direct, No Indirect</p>
<p>PP, HD, IM, NF: Mitigation Measure 3.11-4: Screen Construction Staging Areas. The project applicant(s) for all project phases shall locate staging and material storage areas as far away from sensitive land uses (i.e., residential areas, schools, parks) and/or nearby roadways as possible. Staging and material storage areas shall be approved by the City before the approval of grading plans and building permits for all project phases, and shall be screened from adjacent occupied land uses in earlier development phases to the maximum extent practicable. Screens may include berms or fences. The screen design shall be approved by the City to further reduce visual effects to the extent possible.</p> <p>Timing: Before the approval of grading plans and building permits, and during all phases of construction for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.11-5: Temporary Degradation of Visual Character for Future Project-Related Land Uses from Ongoing Mining Activities</p>	<p>Direct & SU(m), No Indirect</p>	<p>Direct & SU(m), No Indirect</p>	<p>Direct & SU(m), No Indirect</p>	<p>Direct & SU(m), No Indirect</p>	<p>No Direct, No Indirect</p>
<p>PP, HD, IM, NF: Mitigation Measure 3.11-5: Screen Mining Areas. Before the issuance of certificates of occupancy and final inspections for facilities where mining activities will be visible, the project applicant(s) for all project phases shall visually screen project-related development from mining activities to the maximum extent practicable. If mining activities, including reclamation activities, are anticipated to occur for more than 1 year after project approval, a combination of fast-growing shrubs and trees shall be planted around mining project boundaries to provide screening.</p> <p>Timing: Before the issuance of certificates of occupancy and final inspections for facilities where mining activities would be visible for all project phases.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.11-6: New Light and Glare Effects	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.11-6: Establish and Require Conformance to Lighting Standards and Prepare and Implement a Lighting Plan. To reduce impacts associated with light and glare, the project applicant(s) for all project phases shall conform to the following guidelines:</p> <ul style="list-style-type: none"> ▶ Meet the minimum City lighting standards for all project-related lighting. All lighting fixtures shall be designed to be consistent with the Design Guidelines contained in the City General Plan. ▶ Shield or screen lighting fixtures to direct the light downward and prevent light spill on adjacent properties. ▶ Place and direct flood or area lighting needed for construction activities or for nighttime sporting activities to not disturb adjacent residential areas and passing motorists. ▶ Prohibit the use of harsh mercury vapor, low-pressure sodium, or fluorescent bulbs for public lighting in residential neighborhoods. ▶ Use appropriate building materials, lighting, and signage in the office/commercial areas to prevent light and glare from adversely affecting motorists on nearby roadways. ▶ Design exterior lighting as an integral part of the building and landscape design in the Rio del Oro Specific Plan area. Lighting fixtures shall be architecturally consistent with the overall site design and character and shall be consistent with the City’s Design Guidelines. ▶ Establish standards for outdoor lighting to reduce high-intensity nighttime lighting and glare as part of the Rio del Oro Specific Plan design guidelines/standards. Consideration shall be given to design features, namely directional shielding for street lighting, parking lot lighting, and other significant light sources, that will reduce effects of nighttime lighting. In addition, consideration shall be given to the use of automatic shutoffs or motion sensors for lighting features to further reduce excess nighttime light. All nighttime lighting shall be shielded to prevent the light from shining off of the surface intended to be illuminated. <p>A lighting plan shall be submitted to the City for review and approval which shall include the above elements. The lighting plan may be submitted concurrently with other improvement plans, and shall be submitted before the installation of any lighting or the approval of building permits for all phases. The project applicant(s) of all future phases shall implement the approved lighting plan.</p> <p>Timing: Before the approval of building permits for all phases.</p> <p>Enforcement: City of Rancho Cordova Planning and Public Works Departments.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.11-7: New Skyglow Effects	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.11-6.</p> <p>NP: No mitigation measures are required.</p>					
Project Level (Phase 1)					
Impact 3.11-8: Alteration of a Scenic Vista	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.11-9: Damage to Scenic Resources within a State Scenic Highway	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.11-10: Degradation of Visual Character	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.11-3.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.11-11: Temporary Degradation of Visual Character from Construction Activity and Staging Areas	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.11-4.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.11-12: Temporary Degradation of Visual Character for Future Project-Related Land Uses from Ongoing Mining Activities	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measures 3.11-5 and 3.16-5.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.11-13: New Light and Glare Effects	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.11-6.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.11-14: New Skyglow Effects	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.11-6.</p> <p>NP: No mitigation measures are required.</p>					
3.12 PARKS AND RECREATION					
Program Level					
Impact 3.12-1: Sufficiency of Project Site Parkland to Meet Increased Demand and Potential Increased Use and Deterioration of Existing Facilities	Direct & B, No Indirect	Direct & Indirect LTS(m)	Direct & B, No Indirect	Direct & B, No Indirect	No Direct, Indirect & B
<p>HD: Mitigation Measure 3.12-1: Develop a Parkland Plan and Comply with Parkland Requirements. The project applicant(s) for all project phases except Phase 1 shall comply with CRPD’s parkland requirements of 5 acres per 1,000 residents. To satisfy the parkland shortfall that would be created with project implementation, the project applicant(s) shall develop a parkland plan for review and approval by CRPD and the City. The parkland plan shall identify options to meet the standard of 5 acres per 1,000 residents, which may include dedication of additional parkland acreage either on- or off-site, payment of in-lieu fees, or expansion/improvement of existing park facilities.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Timing: Before approvals of tentative maps for all project phases except Phase 1.</p> <p>Enforcement: Cordova Recreation & Park District and City of Rancho Cordova Planning Department.</p> <p>PP, IM, NF, NP: No mitigation measures are required.</p>					
Project Level (Phase 1)					
Impact 3.12-2: Sufficiency of Project Site Parkland to Meet Increased Demand and Potential Increased Use and Deterioration of Existing Facilities	Direct & B, No Indirect	Direct & B, No Indirect	Direct & B, No Indirect	Direct & B, No Indirect	No Direct, Indirect & B
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
3.13 HAZARDS AND HAZARDOUS MATERIALS					
Program Level					
Impact 3.13-1: Possible Exposure to Contaminated Soil or Groundwater	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.13-2: Possible Delays in Development of Future Land Uses from Remediation Activities	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.13-2a: Require the Project Applicant(s) to Cooperate with Aerojet and Regulatory Agencies to Preserve, Modify, or Close Existing Groundwater Monitoring Wells. The project applicant(s) for all project phases shall submit copies of tentative maps for residential subdivisions and for nonresidential uses to Aerojet, DTSC, and the Central Valley RWQCB or any successor in interest for review and approval. Aerojet, DTSC, and the Central Valley RWQCB or any successor shall work with the project applicant(s) to establish the preservation, modification, or closure of existing groundwater wells. If necessary, Aerojet, MDC, or any successor may purchase lots from the project applicant(s) to maintain access to monitoring wells. Development shall not proceed until DTSC and the Central Valley RWQCB have approved Aerojet's or a successor's plan for well preservation, modification, or closure.</p> <p><u>The project applicant(s) shall work with Aerojet, DTSC and the Central Valley RWQCB or any successor to establish the preservation, modification, or closure of existing groundwater monitoring wells. If groundwater wells are to be affected by proposed tentative maps, then applicant(s) or successors shall provide City with evidence that the well(s) relocation, modification or closure is approved by the appropriate agencies as part of the City's final map approval process and prior to development.</u></p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Timing: Before approval of <u>small-lot</u> tentative maps for any portions of the project site except the Phase 1 area as shown in Exhibit 3.13-1.</p> <p>Enforcement: California Department of Toxic Substances Control, Central Valley Regional Water Quality Control Board, Aerojet General Corporation, and City of Rancho Cordova Planning Department.</p> <p>Mitigation Measure 3.13-2b: Coordinate Development Activities to Avoid Interference with Remediation Activities. The project applicant(s) for all project phases shall provide notice to Aerojet or any successor in interest and DTSC, the Central Valley RWQCB, and the City of the location, nature, and duration of construction activities within each phase of development at least 1 month before the construction activities begin in areas on or near property with current or planned remediation activities. Before the approval of grading plans for all project phases, the project applicant(s) shall work with Aerojet, DTSC, and the Central Valley RWQCB or any successor to schedule the timing of construction activities to prevent potential conflicts with remediation activities.</p> <p>Timing: Before the approval of grading plans and during construction activities for all project phases.</p> <p>Enforcement: California Department of Toxic Substances Control, Central Valley Regional Water Quality Control Board, Aerojet General Corporation, and City of Rancho Cordova Planning Department.</p> <p>Mitigation Measure 3.13-2c: Notify the City in Writing that DTSC-Required Notification Obligations Regarding Deed Restrictions and/or Easements Have Been Fulfilled. Pursuant to its oversight over investigations of hazardous substances and determination of remedial action, DTSC establishes, as appropriate, deed restrictions (e.g., restrictions on future groundwater uses or future land uses) or easements (e.g., continued access to groundwater wells and pipelines) on property with associated notice requirements. The project applicant(s) for all such affected project phases shall provide notification in writing to the City that said required DTSC notification obligations have been fulfilled. Evidence of the method of notification required by DTSC shall be submitted to the City before approval of final maps and/or the issuance of permits for sales trailers and model homes. The project applicant(s) for such affected project phases shall coordinate with the City to include this provision as part of tentative map approval.</p> <p>Timing: Before approval of <u>small-lot</u> final maps and/or issuance of permits for sales trailers and model homes for all project phases.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.13-3: Possible Exposure to Hazardous Building Materials	Direct & Indirect	Direct & Indirect	Direct & Indirect	Direct & Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.13-3: Conduct a Hazardous-Building-Materials Study and Implement all Applicable Regulations. Before the approval of demolition permits for any existing on-site buildings, the project applicant(s) for all project phases except development Phase 1 shall hire a qualified consultant to investigate whether any of the existing on-site structures contain lead or ACMs that could become friable or mobile during demolition activities. If lead-containing materials or ACMs are found, the project applicant(s) shall coordinate with the County Environmental Management Department to ensure that such materials are properly removed (i.e., by an accredited inspector in accordance with EPA and Cal-OSHA standards). In addition, all activities (construction or</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
demolition) in the vicinity of these materials shall comply with Cal-OSHA standards related to exposure of workers to asbestos and lead. The lead-containing materials and ACMs shall be handled properly and transported to an appropriate off-site disposal facility. Timing: Before the approval of demolition permits for existing on-site structures and during all demolition activities for all project phases except development Phase 1. Enforcement: County of Sacramento Environmental Management Department and City of Rancho Cordova Planning Department. NP: No mitigation measures are required.					
Impact 3.13-4: Use of Hazardous Materials On-Site	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.13-5: Potential Safety Hazards from Construction Activities and Mining Operations	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
PP, HD, IM, NF: Mitigation Measure 3.13-5: Implement Public-Safety Features during Construction Activities and Mining Operations. The following public-safety protection features shall be implemented before the approval of grading plans and building permits for all project phases, and before the issuance of future mining permits: <ul style="list-style-type: none"> ▶ Temporary fencing shall be installed around construction areas with signage indicating the presence of an active construction zone, and warning the public to keep out. ▶ Temporary fencing shall be installed around mining areas with signage indicating the presence of active mining operations, and warning the public to keep out. ▶ Mining equipment shall not be operated and mining activities shall not occur within 1,100 feet of any noise-sensitive receptor, or within 375 feet if a temporary barrier is constructed in accordance with the following specifications: <ul style="list-style-type: none"> • The barrier shall be located as close to the noise source or as close to the receptor as possible and shall break the line of sight between the source and receptor. • The barrier shall be constructed with three-quarter-inch Medium Density Overlay (MDO) plywood sheeting, or other acceptable material having a surface weight of 2 pounds per square foot (lb/sf) or greater, and a demonstrated Sound Transmission Class (STC) rating of 25 or greater as defined by American Society for Testing and Materials (ASTM) Test Method E90. 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> Weather- and abuse-resistant material shall be used for a temporary acoustical curtain. The material shall exhibit superior hanging and tear strength during construction with a surface weight of at least 1 lb/sf. The material shall have a minimum breaking strength of 120 pounds per inch (lb/in) per Federal Test Method Standard (FTMS) 191 A-M5102 and minimum tear strength of 30 lb/in per ASTM Test Method D117. Based on the same test procedures, the absorptive material facing shall have a minimum breaking strength of 100 lb/in and minimum tear strength of 7 lb/in. The material shall have an STC rating of 25 or greater, based on certified sound transmission loss data taken according to ASTM Test Method E90. It shall also have a Noise Reduction Coefficient (NRC) rating of 0.70 or greater, based on certified sound absorption coefficient data according to ASTM Test Method C423. The mating surfaces of the barrier sides shall be installed flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that will completely close the gaps, and be dense enough to attenuate noise. <p>Timing: Before the approval of grading plans and building permits for all project phases, before issuance of future mining permits, and during all project construction for all project phases and mining activities.</p> <p>Enforcement: City of Rancho Cordova Public Works Department and Building and Safety Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.13-6: Human Health Hazards Associated with Mosquitoborne Diseases</p>	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	LTS
<p>PP, HD, IM, NF: Mitigation Measure 3.13-6: Develop and Implement Site-Specific Wetland Mosquito Management Guidelines. Before the start of construction activities for all project phases, the project applicant(s) shall develop a set of site-specific Wetland Mosquito Management Guidelines. The guidelines shall be submitted to the City for review and approval. The project applicant(s) shall implement the guidelines once they have been approved.</p> <p>Timing: Before the start of construction activities and as specified in the guidelines for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department and Building and Safety Department.</p> <p>NP: No mitigation measures are required.</p>					
Project Level (Phase 1)					
<p>Impact 3.13-7: Possible Exposure to Contaminated Soil or Groundwater</p>	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.13-8: Possible Delays in Development of Future Land Uses from Remediation Activities</p> <p>Direct & Indirect LTS(m), No Indirect</p> <p>PP, HD, IM, NF: Implement Mitigation Measures 3.13-2a, 3.13-2b, and 3.13-2c. NP: No mitigation measures are required.</p>	Direct & Indirect LTS(m), No Indirect	Direct & Indirect LTS(m), No Indirect	Direct & Indirect LTS(m), No Indirect	Direct & Indirect LTS(m), No Indirect	No Direct, No Indirect
<p>Impact 3.13-9: Possible Exposure to Hazardous Building Materials</p> <p>No Direct, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect	No Direct, No Indirect
<p>Impact 3.13-10: Use of Hazardous Materials On-Site</p> <p>Direct & Indirect LTS, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	Direct & Indirect LTS, No Indirect	Direct & Indirect LTS, No Indirect	Direct & Indirect LTS, No Indirect	Direct & Indirect LTS, No Indirect	No Direct, No Indirect
<p>Impact 3.13-11: Potential Safety Hazards from Construction Activities and Mining Operations</p> <p>Direct & Indirect LTS(m), No Indirect</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.13-5. NP: No mitigation measures are required.</p>	Direct & Indirect LTS(m), No Indirect	Direct & Indirect LTS(m), No Indirect	Direct & Indirect LTS(m), No Indirect	Direct & Indirect LTS(m), No Indirect	No Direct, No Indirect
<p>Impact 3.13-12: Human Health Hazards Associated with Mosquitoborne Diseases</p> <p>Direct & Indirect LTS(m), No Indirect</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.13-6. NP: No mitigation measures are required.</p>	Direct & Indirect LTS(m), No Indirect	Direct & Indirect LTS(m), No Indirect	Direct & Indirect LTS(m), No Indirect	Direct & Indirect LTS(m), No Indirect	LTS

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.14 TRAFFIC AND TRANSPORTATION					
Program Level and Project Level (Phase 1)					
Impact 3.14-1: Increases to Peak-Hour and Daily Traffic Volumes, Resulting in Unacceptable Levels of Service	See below for Direct; No Indirect	See below for Direct; No Indirect	See below for Direct; No Indirect	See Note above for Direct & Indirect	No Direct, No Indirect
Mitigation Measure Common to All Impacts under Impact 3.14-1					
To avoid repetition, the information contained in the following mitigation measure applies to all other mitigation measures required under Impact 3.14-1. Note that no mitigation measures are required for the No Project Alternative because, as described above, no direct or indirect impacts would occur.					
PP, HD, IM: The project applicant(s) for all project phases shall participate in the necessary improvements identified in all of the following mitigation measures. The project's fair-share participation and the associated timing of the improvements shall be identified in <u>Tier 2 entitlements for the project and before any physical development of the property and will amend the project conditions of approval and in the mitigation monitoring and reporting program for the project to include these participation and timing details for traffic improvements.</u> or in conjunction with and as an appendix to the specific plan (see mitigation measures following each identified impact).					
The timing and enforcement (described below) would be the same for all identified mitigation measures associated with Impact 3.14-1.					
Timing: <u>As part of Tier 2 entitlements and before any physical development of the property (excluding on-site wetland fill and mitigation activities), a condition of project approval and/or as a condition of the development agreement for all project phases.</u> As part of Tier 2 entitlements and before any physical development of the property (excluding on-site wetland fill and mitigation activities), a condition of project approval and/or as a condition of the development agreement for all project phases.					
Enforcement: City of Rancho Cordova Public Works Department.					
Please note that the improvements described in each of the following mitigation measures have not been designed, and therefore, project-specific impacts resulting from these improvements cannot be precisely identified or quantified.					
If need be, the site-specific impacts of the identified improvements will be assessed pursuant to CEQA requirements when specific intersection and roadway improvement plans are developed, separate from the Rio del Oro DEIR/DEIS. Any such necessary environmental review will be completed before final approval of the improvements identified in the mitigation measures. No such additional review may be necessary, however, if the effects of such improvements are consistent with what can generally be expected of such improvements, as set forth immediately below.					
Based on review of existing available environmental documentation, field review at a reconnaissance level, and review of aerial photography, it is anticipated that, at worst, the construction of these intersection and roadway improvements could directly adversely affect wetland resources and associated grassland habitat area and could result in construction-related environmental effects, including but not limited to:					
<ul style="list-style-type: none"> ▶ impacts related to construction traffic, noise, air quality, water quality, and drainage; 					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> ▶ impacts on cultural resources; and ▶ impacts on special-status plants and animals and their habitats. <p>In addition to construction-related impacts, implementation of these improvements could result in long-term effects on water quality and drainage. The impacts that could arise from the planned improvements would be measured using the significance thresholds identified in each section of Chapter 3 of this DEIR/DEIS.</p> <p>Once a planned roadway is designed, the City would retain a qualified biologist to conduct a reconnaissance survey to determine the type(s) of habitat to be removed, and whether wetlands or special-status species are present. The City would also conduct a cultural resources records search to determine whether any known cultural resources are present.</p> <p>The mitigation measures recommended in Chapter 3 of this DEIR/DEIS would be applied (where applicable) to mitigate any such effects, if significant, to less-than-significant levels. For example, measures would be implemented to ensure no net loss of wetlands. Best management practices and Sacramento Metropolitan Air Quality Management District measures would be implemented for water and air quality effects, and preconstruction surveys would be performed where sensitive habitat is present (and if special-status species or habitat is present, the biological resources protection measures would be implemented). The relocation of any utility pole or other utilities would be coordinated with the appropriate service provider to ensure that there would be no impact on the service provider. Additionally, if permits or other authorizations are required, they would be secured and the conditions would be followed.</p> <p>For improvements to the following intersections and roadway improvements, the following impacts (in addition to the above) could result from implementation of required improvements:</p> <ul style="list-style-type: none"> ▶ Direct impacts on the Folsom South Canal from implementation of the Zinfandel Drive and International Drive Extensions—Sunrise Boulevard/Douglas Road, Sunrise Boulevard/White Rock Road, and Sunrise Boulevard/Folsom Boulevard intersections (Intersections 9, 18, and 19, respectively) ▶ Direct impacts from the required grade separation structure—Sunrise Boulevard/Zinfandel Drive intersection (Intersection 22) ▶ Direct impacts from potential widening of the structure across U.S. 50—Hazel Avenue/U.S. 50 eastbound ramps and Hazel Avenue/U.S. 50 westbound ramps intersections (Intersections 24 and 25, respectively) ▶ Direct impacts on the Folsom South Canal from implementation of the International Drive Extension—Kilgore Road/White Rock Road intersection (Intersection 27) ▶ Direct impacts from required widening of the existing crossing of the Folsom South Canal—Douglas Road between Mather Boulevard and Sunrise Boulevard (Roadway Segment 5) ▶ Direct impacts from potential removal of approximately 40 large trees (primarily oak trees) and associated (primarily grassland) vegetation, and approximately 100 power poles, resulting from improvements to White Rock Road between Sunrise Boulevard and Grant Line Road (Roadway Segment 9) ▶ Direct impacts from required new river crossings of the American River—Sunrise Boulevard between Gold Country Boulevard and Coloma Road and Sunrise Boulevard between Coloma Road and the U.S. 50 westbound ramps (Roadway Segments 17 and 18, respectively) ▶ Direct impacts from potential removal of approximately 80 utility poles, 60 street lights, approximately 50 large trees, and commercial/industrial property, 					

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>resulting from improvements to Sunrise Boulevard between Folsom Boulevard and White Rock Road (Roadway Segment 20)</p> <ul style="list-style-type: none"> ▶ Direct impacts from potential removal of approximately 60 utility poles, 100 street lights, approximately 40 large trees (primarily oak trees and landscaped trees), and commercial/industrial property, resulting from improvements to Sunrise Boulevard between White Rock Road and Douglas Road (Roadway Segment 21) ▶ Direct impacts from potential removal of approximately 35 utility poles and two trees, as well as other vegetation, resulting from improvements to Douglas Road between Jaeger Road and Sunrise Boulevard (Roadway Segment 31) ▶ Direct impacts from potential removal of approximately 50 power poles, resulting from improvements to Sunrise Boulevard between Douglas Road and Kiefer Boulevard (Roadway Segment 33) ▶ Direct impacts on an already congested Sunrise Boulevard corridor <p>Regarding the Sunrise Boulevard corridor, phasing of circulation improvements, consistent with the City’s Infrastructure Phasing Plan, would aid in minimizing impacts on intersections and roadway segments on Sunrise Boulevard and should be considered when prioritizing improvements for implementation.</p>					
<p>Impact 3.14-1a: Unacceptable LOS at the SR 16/Excelsior Road Intersection (Intersection 1)</p> <p>PP, HD, IM: Mitigation Measure 3.14-1a: Participate in Improvements to the SR 16/Excelsior Road Intersection (Intersection 1). To ensure that the SR 16/Excelsior Road intersection operates at an acceptable LOS, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ The northbound approach must be reconfigured to consist of one left-turn lane, one through lane, and one shared through/right-turn lane. ▶ The southbound approach must be reconfigured to consist of two left-turn lanes, two through lanes, and one right-turn lane. ▶ The eastbound approach must be reconfigured to consist of one left-turn lane, one through lane, and one right-turn lane. ▶ The westbound approach must be reconfigured to consist of one left-turn lane, two through lanes, and one right-turn lane. <p>These improvements would require widening of SR 16 east and west of the intersection to accommodate the additional lanes.</p> <p>Improvements to the SR 16/Excelsior Road intersection are contained within the <i>SunRidge Specific Plan Public Facilities Financing Plan</i> and zoning conditions. The CEQA Findings of Fact and Statement of Overriding Considerations for the Sunrise Douglas Community Plan/SunRidge Specific Plan Project state that physical improvement of this intersection is feasible. Implementation of the improvements described above would assist in reducing traffic impacts on this intersection by providing acceptable operations. If these improvements are completed concurrent with development of the SunRidge Specific Plan and implemented before development Phase 1 of the Rio del Oro project, then the project impact at this intersection would be reduced to a less-than-significant level.</p> <p>Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1a would reduce the significant impact on Intersection 1 under development Phase 1 (Proposed Project Alternative) and at full buildout under the Proposed Project, High Density, and Impact Minimization Alternatives to a less-than-significant level, by allowing the intersection to operate at an acceptable LOS D or better. However, the identified improvements, including the necessary widening of SR 16 east and west of the intersection, fall</p>	SU(m)	SU(m)	SU(m)	SU	NI

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
under the jurisdiction of Caltrans and the County; therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable . If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.					
Impact 3.14-1b: Unacceptable LOS at the SR 16/Eagles Nest Road Intersection (Intersection 2)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1b: Participate in Improvements at the SR 16/Eagles Nest Road Intersection (Intersection 2). To ensure that the SR 16/Eagles Nest Road intersection operates at an acceptable LOS, a traffic signal must be installed at this intersection, and the eastbound and westbound approaches must be reconfigured to consist of one left-turn lane, one through lane, and one shared through/right-turn lane.</p> <p>These improvements would require widening of SR 16 for 1,000 feet on both sides of this intersection to accommodate the additional through lanes.</p> <p>Improvements to the SR 16/Eagles Nest Road intersection are contained within the <i>SunRidge Specific Plan Public Facilities Financing Plan</i> and zoning conditions. The CEQA Findings of Fact and Statement of Overriding Considerations for the Sunrise Douglas Community Plan/SunRidge Specific Plan Project state that physical improvement of this intersection is feasible. Implementation of the improvements described above, including the necessary widening of SR 16, would assist in reducing traffic impacts on this intersection. If these improvements are completed concurrent with development of the SunRidge Specific Plan and implemented before development Phase 1 of the Rio del Oro project, then the project impact at this intersection would be reduced to a less-than-significant level.</p> <p>Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1b would reduce the significant impact on Intersection 2 under development Phase 1 (Proposed Project Alternative) and at full buildout under the Proposed Project, High Density, and Impact Minimization Alternatives to a less-than-significant level, by allowing the intersection to operate at an acceptable LOS D or better. However, the identified improvements fall under the jurisdiction of Caltrans and the County; therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
Impact 3.14-1c: Unacceptable LOS at the SR 16/Sunrise Boulevard Intersection (Intersection 3)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1c: Participate in Improvements to the SR 16/Sunrise Boulevard Intersection (Intersection 3). To ensure that the SR 16/Sunrise Boulevard intersection operates at an acceptable LOS, the northbound approach must be reconfigured to consist of one left-turn lane, one through lane, and one shared through/right-turn lane; and the southbound approach must be reconfigured to consist of one left-turn lane, two through lanes, and one right-turn lane.</p> <p>An additional through lane would be needed in the eastbound and westbound directions, which would require widening of SR 16 on both sides of the intersection for a minimum of 1,000 feet in both directions. With these improvements, this intersection would operate at an acceptable LOS.</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Improvements to the SR 16/Sunrise Boulevard intersection are contained within the County Development Fee Program, are scheduled for Measure A funding, and are within the <i>Mather Field Specific Plan Financing Plan</i>. Implementation of the improvements described above, including the necessary widening of SR 16, would assist in reducing traffic impacts on this intersection. If these improvements are completed concurrent with development of the Mather Field Specific Plan and implemented before development Phase 1 of the Rio del Oro project, then the project impact at this intersection would be reduced to a less-than-significant level.</p> <p>Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1c would reduce the significant impact on Intersection 3 under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives to a less-than-significant level, by allowing the intersection to operate at an acceptable LOS. However, the identified improvements fall under the jurisdiction of Caltrans and the County; therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
<p>Impact 3.14-1d: Unacceptable LOS at the SR 16/Grant Line Road Intersection (Intersection 4)</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1d: Participate in Improvements to the SR 16/Grant Line Road Intersection (Intersection 4). To ensure that the SR 16/Grant Line Road intersection operates at an acceptable LOS, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ The northbound and southbound approaches must be reconfigured to consist of one left-turn lane and one shared through/right-turn lane. ▶ Protected left-turn signal phasing must be provided on the northbound and southbound approaches. ▶ The eastbound and westbound approaches must be reconfigured to consist of one left-turn lane, one through lane, and a shared through/right-turn lane. <p>These improvements would require widening of SR 16 1,000 feet on both sides of the intersection.</p> <p>Improvements to the SR 16/Grant Line Road intersection are contained within the County Development Fee Program, are scheduled for Measure A funding, and are within the <i>Mather Field Specific Plan Financing Plan</i>. Implementation of the improvements described above, including the necessary widening of SR 16, would assist in reducing traffic impacts on this intersection; with them, this intersection would operate at an acceptable LOS. If these improvements are completed concurrent with development of the Mather Field Specific Plan and implemented before development Phase 1 of the Rio del Oro project, then the project impact at this intersection would be reduced to a less-than-significant level.</p> <p>Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1d would reduce the significant impact on Intersection 4 under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives to a less-than-significant level, by allowing the intersection to operate at an acceptable LOS. However, the identified improvements fall under the jurisdiction of Caltrans and the County; therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-1e: Unacceptable LOS at the Florin Road/Sunrise Boulevard Intersection (Intersection 5)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1e: Participate in Improvements to the Florin Road/Sunrise Boulevard Intersection (Intersection 5). To ensure that the Florin Road/Sunrise Boulevard intersection operates at an acceptable LOS, the southbound approach must be reconfigured to consist of one through lane and one dedicated right-turn lane. Improvements to this intersection must be coordinated with the County and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1e would reduce the significant impact on Intersection 5 under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives to a less-than-significant level, by allowing the intersection to operate at an acceptable LOS. However, the identified improvements fall under the jurisdiction of the County; therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If the County cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
Impact 3.14-1f: Unacceptable LOS at the Grant Line Road/Sunrise Boulevard Intersection (Intersection 6)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1f: Participate in Improvements to the Grant Line Road/Sunrise Boulevard Intersection (Intersection 6). To ensure that the Grant Line Road/Sunrise Boulevard intersection operates at an acceptable LOS, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ A traffic signal must be installed at this intersection. ▶ The southbound approach must be reconfigured to consist of one left-turn lane, one through lane, and two dedicated right-turn lanes. ▶ The northbound approach must be reconfigured to consist of one left-turn lane, one through lane, and one right-turn lane. ▶ Protected left-turn phases must be provided on the northbound and southbound approaches. ▶ A second eastbound left-turn lane must be added. ▶ Adequate receiving lanes must be provided on Sunrise Boulevard and Grant Line Road to accommodate the identified intersection geometrics. <p>Interim improvements to the Grant Line Road/Sunrise Boulevard intersection are contained within the Elk Grove West Vineyard Plan, with ultimate improvements within the <i>Vineyard Springs Comprehensive Plan Public Facilities Financing Plan</i>. Implementation of the improvements described above would assist in reducing traffic impacts on this intersection. If the improvements are completed concurrent with development of the West Vineyard Specific Plan and implemented before development Phase 1 of the Rio del Oro project, then the project impact at this intersection would be reduced to a less-than-significant level.</p> <p>Improvements to this intersection must be coordinated with the County.</p> <p>Implementation of Mitigation Measure 3.14-1f would reduce the significant impact on Intersection 6 under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives to a less-than-significant level, by allowing the intersection to operate at an acceptable LOS. However, the identified improvements fall under the jurisdiction of the County; therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If the County cooperates in</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.					
Impact 3.14-1g: Unacceptable LOS at the Grant Line Road/Douglas Road Intersection (Intersection 8)	LTS(m)	LTS(m)	LTS(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1g: Participate in Improvements to the Grant Line Road/Douglas Road Intersection (Intersection 8). To ensure that the Grant Line Road/Douglas Road intersection operates at an acceptable LOS, a traffic signal must be installed at this intersection.</p> <p>Improvements to the Grant Line Road/Douglas Road intersection are contained within the <i>SunRidge Specific Plan Public Facilities Financing Plan</i>. Implementation of the improvement described above would assist in reducing traffic impacts on this intersection. If this improvement is completed concurrent with development of the SunRidge Specific Plan and implemented before development Phase 1 of the Rio del Oro project, then the project impact at this intersection would be reduced to a less-than-significant level.</p>					
Impact 3.14-1h: Unacceptable LOS at the Sunrise Boulevard/Douglas Road Intersection (Intersection 9)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1h: Participate in Improvements to the Sunrise Boulevard/Douglas Road Intersection (Intersection 9). Improvements must be made to ensure that the Sunrise Boulevard/Douglas Road intersection operates at an acceptable LOS. Specifically, all approaches must be reconfigured to consist of two left-turn lanes, three through lanes, and one right-turn lane. However, with implementation of this improvement, the intersection would continue to operate at an unacceptable LOS E or LOS F.</p> <p>To further improve operations at the intersection, additional roadway connectivity is required. To achieve this connectivity, the Zinfandel Drive Extension must be implemented (to accommodate traffic generated within the SunRidge Specific Plan area), International Drive must be extended to Sunrise Boulevard and into and through the Rio del Oro project site, and Rancho Cordova Parkway (and its connection to U.S. 50) must be implemented.</p> <p>Improvements to this intersection are contained within the <i>SunRidge Specific Plan Public Facilities Financing Plan</i>. The extension of Zinfandel Drive is identified as part of the <i>Mather Field Specific Plan Public Facilities Financing Plan</i>. Funding has been identified for Rancho Cordova Parkway and the interchange and for the extension of International Drive to Sunrise Boulevard within the City's CIP program. Implementation of the improvements identified above would assist in reducing traffic impacts on this intersection.</p> <p>Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1h would reduce the significant impact on Intersection 9 to a less-than-significant level by improving intersection LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, the identified improvements are not under the City's jurisdiction. The Zinfandel Drive Extension falls under the jurisdiction of the County, and Rancho Cordova Parkway and its associated interchange fall under the jurisdiction of Caltrans and the County. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If Caltrans and the County</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.					
Impact 3.14-1i: Unacceptable LOS at the Mather Field Road/U.S. 50 Eastbound Ramps (Intersection 12)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1i: Participate in Improvements to the Mather Field Road/U.S. 50 Eastbound Ramps Intersection (Intersection 12). Improvements must be made to ensure that the Mather Field Road/U.S. 50 eastbound ramps intersection operates at an acceptable LOS. Specifically, the eastbound ramp needs modification to make the eastbound right turn a “free” movement. This would require a receiving lane on Mather Field Road, south of the intersection.</p> <p>To further improve operations at the intersection, additional roadway connectivity is required. To achieve this connectivity, the Zinfandel Drive Extension must be implemented (to accommodate traffic generated within the SunRidge Specific Plan area), International Drive must be extended to Sunrise Boulevard and into and through the Rio del Oro project site, and Rancho Cordova Parkway (and its connection to U.S. 50) must be implemented.</p> <p>The extension of Zinfandel Drive is identified as part of the <i>Mather Field Specific Plan Public Facilities Financing Plan</i>. Funding has been identified for Rancho Cordova Parkway and the interchange and for the extension of International Drive to Sunrise Boulevard within the City’s CIP program. Implementation of the improvements identified above would assist in reducing traffic impacts on this intersection.</p> <p>Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1i would reduce the significant impact on Intersection 12 to a less-than-significant level by improving intersection LOS under full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, the identified improvements are not under the City’s jurisdiction. The intersection is ultimately controlled by Caltrans. The Zinfandel Drive Extension falls under the jurisdiction of the County, and Rancho Cordova Parkway and its associated interchange fall under the jurisdiction of Caltrans and the County. Therefore, neither the City nor the project applicant(s) would have control over the timing or implementation of these improvements. Thus, this impact would remain significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
Impact 3.14-1j: Unacceptable LOS at the Zinfandel Drive/White Rock Road Intersection (Intersection 15)	LTS(m)	LTS(m)	LTS(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1j: Participate in Improvements to the Zinfandel Drive/White Rock Road Intersection (Intersection 15). To offset project-related impacts at the Zinfandel Drive/White Rock Road intersection, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ The southbound approach must be reconfigured to consist of three left-turn lanes, two through lanes, and one right-turn lane. ▶ The eastbound approach must be reconfigured to consist of two left-turn lanes, two through lanes, and one shared through/right-turn lane. ▶ The westbound approach must be reconfigured to consist of two left-turn lanes, three through lanes, and one free right-turn lane. 					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Although these improvements offset the impacts of the project, this intersection would still operate at an unacceptable LOS. Additional improvements must be made to satisfy the City’s LOS D threshold, including additional roadway connectivity such as the extension of International Drive to Sunrise Boulevard, extension of Kiefer Boulevard, and implementation of Rancho Cordova Parkway (and its connection to U.S. 50).</p> <p>Improvements to this intersection are identified in the City’s Circulation Element/Plan and included in the City’s CIP. Implementation of the improvements identified above would assist in reducing traffic impacts on this intersection.</p>					
Impact 3.14-1k: Unacceptable LOS at the Zinfandel Drive/U.S. 50 Eastbound Ramps Intersection (Intersection 16)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1k: Participate in Improvements to the Zinfandel Drive/U.S. 50 Eastbound Ramps Intersection (Intersection 16). To ensure that the Zinfandel Drive/U.S. 50 eastbound ramps intersection operates at an acceptable LOS, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ The northbound approach must be reconfigured to consist of four through lanes and one shared through/right-turn lane. ▶ The eastbound approach must be reconfigured to consist of three left-turn lanes, one through lane, and one free right-turn lane. ▶ The westbound approach must be reconfigured to consist of three right-turn lanes. ▶ The southbound approach must be reconfigured to consist of three through lanes and a free right-turn lane. <p>Improvements to this intersection are identified in the City’s CIP. Implementation of the improvements identified above would assist in reducing traffic impacts on the intersection. These improvements must be coordinated with Caltrans and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1k would reduce the significant impact on Intersection 16 to a less-than-significant level by improving intersection LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, these identified improvements fall under the jurisdiction of Caltrans. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If Caltrans cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
Impact 3.14-1l: Unacceptable LOS at the Sunrise Boulevard/White Rock Road Intersection (Intersection 18)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1l: Participate in Improvements to the Sunrise Boulevard/White Rock Road Intersection (Intersection 18). With two left-turn lanes, three through lanes, and one right-turn lane currently on all approaches, the Sunrise Boulevard/White Rock Road intersection would continue to operate at an unacceptable LOS as a result of sufficiently high volumes from traffic generated by the SunRidge Specific Plan and Rio del Oro Specific Plan. Therefore, to ensure that this intersection operates at an acceptable LOS, additional improvements must be made, such as grade separation of the intersection (consistent with the City’s Circulation Element/Plan) and/or additional roadway facilities such as the Zinfandel Drive Extension, International Drive Extension into and through the Rio del Oro project site, and implementation of Rancho Cordova Parkway (and its connection to U.S. 50).</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Improvements to this intersection and identified additional roadway connectivity are identified in the <i>Mather Field Specific Plan Public Facilities Financing Plan</i> (Zinfandel Drive Extension) or the City’s CIP. Implementation of the improvements identified above would assist in reducing traffic impacts on this intersection. If these improvements are completed concurrent with development of the Mather Field Specific Plan or City’s Public Facilities Financing Plan and implemented before development Phase 1 of Rio del Oro project, then the project impact at this intersection would be reduced to a less-than-significant level.</p> <p>Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-11 would reduce the significant impact on Intersection 18 to a less-than-significant level by improving intersection LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, some of the identified improvements fall under the jurisdiction of Caltrans and the County. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
<p>Impact 3.14-1m: Unacceptable LOS at the Sunrise Boulevard/Folsom Boulevard Intersection (Intersection 19)</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1m: Participate in Improvements to the Sunrise Boulevard/Folsom Boulevard Intersection (Intersection 19).</p> <p>Improvements must be made to ensure that the Sunrise Boulevard/Folsom Boulevard intersection operates at an acceptable LOS both with implementation of development Phase 1 and at buildout of the specific plan under any of the development alternatives. Specifically, to reduce impacts of development Phase 1, two left-turn lanes, four through lanes, and one right-turn lane should be added on the northbound and southbound approaches; and the westbound approach should be reconfigured to consist of two left-turn lanes, two through lanes, and two right-turn lanes. To reduce impacts associated with specific plan buildout, all of the following improvements should be made:</p> <ul style="list-style-type: none"> ▶ Two left-turn lanes, four through lanes, and one right-turn lane should be added on the southbound approach. ▶ Two left-turn lanes, four through lanes, and one shared through/right-turn lane should be added on the northbound approach. ▶ Two left-turn lanes, two through lanes, and two right-turn lanes should be added on the westbound approach. <p>Implementing the improvements described above would provide acceptable operations at this intersection. However, doing so would require Sunrise Boulevard to expand to eight or more lanes, which is inconsistent with the City’s Circulation Element/Plan because City policy requires roadway cross sections of six or fewer lanes.</p> <p>An alternative to these improvements is to implement parallel capacity improvements, such as implementation of Rancho Cordova Parkway (and its connection to U.S. 50), Zinfandel Drive Extension, International Drive Extension into and through the Rio del Oro project site, and realignment of International Drive with Old Placerville Road (with associated roadway improvements). Implementing these alternative improvements would improve operations at and assist in reducing traffic impacts on this intersection.</p> <p>Some of the improvements described above are identified in the <i>Mather Field Specific Plan Public Facilities Financing Plan</i> (Zinfandel Drive Extension) and the City’s CIP. Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Implementation of Mitigation Measure 3.14-1m would reduce the significant impact on Intersection 19 to a less-than-significant level by improving intersection LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, the intersection widening, which would require Sunrise Boulevard to be expanded to eight or more lanes, which is inconsistent with the City’s Circulation Element/Plan. Additionally, some of the identified parallel capacity improvements fall under the jurisdiction of Caltrans and the County. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If the County cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
<p>Impact 3.14-1n: Unacceptable LOS at the Sunrise Boulevard/U.S. 50 Westbound Ramps Intersection (Intersection 21)</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1n: Participate in Improvements to the Sunrise Boulevard/U.S. 50 Westbound Ramps Intersection (Intersection 21). Improvements must be made to ensure that the Sunrise Boulevard/U.S. 50 westbound ramps intersection operates at an acceptable LOS. Specifically, the westbound approach would need to consist of three left-turn lanes and two right-turn lanes.</p> <p>Improvements to this interchange are identified in the City’s CIP program.</p> <p>An alternative to these improvements is to implement parallel capacity improvements, such as implementation of Rancho Cordova Parkway (and its connection to U.S. 50), Zinfandel Drive Extension, International Drive Extension into and through the Rio del Oro project site, and realignment of International Drive with Old Placerville Road (with associated roadway improvements). Implementing these alternative improvements would improve operations at and assist in reducing traffic impacts on this intersection.</p> <p>Some of the improvements described above are identified in the <i>Mather Field Specific Plan Public Facilities Financing Plan</i> (Zinfandel Drive Extension) and the City’s CIP. Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1n would reduce the significant impact on Intersection 21 to a less-than-significant level by improving intersection LOS under full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, the City, as the lead agency, cannot guarantee implementation of this mitigation measure because the intersection is controlled by Caltrans. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If Caltrans cooperates in allowing the improvement to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
<p>Impact 3.14-1o: Unacceptable LOS at the Sunrise Boulevard/Zinfandel Drive Intersection (Intersection 22)</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1o: Participate in Improvements to the Sunrise Boulevard/Zinfandel Drive Intersection (Intersection 22). Improvements must be made to ensure that the Sunrise Boulevard/Zinfandel Drive intersection operates at an acceptable LOS. Specifically, all of the following improvements should be made:</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> ▶ Two left-turn lanes, three through lanes, and one shared through/right-turn lane should be added on the northbound approach. ▶ One left-turn lane, four through lanes, and one right-turn lane (with treatment to increase capacity such as a receiving lane or pork-chop island) should be added on the southbound approach. (A pork-chop island is a triangular island placed adjacent to a free right-turn lane. It separates right-turning vehicles from through lanes and provides a refuge for pedestrians to cross the right-turn lane before crossing the through lanes.) ▶ One left-turn lane, one through lane, and one right-turn lane should be added on the eastbound approach. ▶ One left-turn lane and one shared through/right-turn lane should be added on the westbound approach. <p>These at-grade improvements are consistent with the County Mobility Study; however, they would be inconsistent with the City’s Circulation Element/Plan, which identifies the segment as a six-lane facility.</p> <p>An alternative to this set of improvements that is consistent with the City’s Circulation Element/Plan is to implement grade separation at the intersection. Either improvement would increase capacity at this intersection and would assist in improving intersection operations.</p> <p>Implementation of Mitigation Measure 3.14-1o would reduce the significant impact on Intersection 22 to a less-than-significant level by improving intersection LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, the intersection widening, which would require Sunrise Boulevard to be expanded to eight lanes, is inconsistent with the City’s Circulation Element/Plan. The alternative improvement, grade separation of the intersection, is consistent with the City’s Circulation Element/Plan, but the required structure would likely have other significant impacts that have not been identified. Because one improvement is inconsistent with the City’s Circulation Element/Plan and the other has potential environmental impacts that have not been evaluated adequately, this impact would remain significant and unavoidable.</p>					
<p>Impact 3.14-1p: Unacceptable LOS at the Hazel Avenue/Folsom Boulevard Intersection (Intersection 23)</p> <p>PP, HD, IM: Mitigation Measure 3.14-1p: Participate in Improvements to the Hazel Avenue/Folsom Boulevard Intersection (Intersection 23). To ensure that the Hazel Avenue/Folsom Boulevard intersection operates at an acceptable LOS, the westbound approach must be reconfigured to consist of one left-turn lane, one through lane, and two right-turn lanes.</p> <p>An alternative to this improvement that is consistent with the City’s Circulation Element/Plan is to implement parallel capacity improvements, such as Easton Valley Parkway and upgrades to White Rock Road.</p> <p>Implementation of Mitigation Measure 3.14-1p would reduce the significant impact on Intersection 23 to a less-than-significant level by improving intersection LOS under full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, most of the identified improvements fall under the jurisdiction of the County. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If the County cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>	SU(m)	SU(m)	SU(m)	SU	NI

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-1q: Unacceptable LOS at the Hazel Avenue/U.S. 50 Eastbound Ramps Intersection (Intersection 24)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1q: Participate in Improvements to the Hazel Avenue/U.S. 50 Eastbound Ramps Intersection (Intersection 24). To ensure that the Hazel Avenue/U.S. 50 eastbound ramps intersection operates at an acceptable LOS, an additional eastbound left-turn lane must be installed, with an appropriate receiving lane. Improvements to this intersection must be coordinated with Caltrans and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1q would reduce the significant impact on Intersection 24 to a less-than-significant level by improving intersection LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, some of the identified improvements fall under the jurisdiction of Caltrans. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If Caltrans cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
Impact 3.14-1r: Unacceptable LOS at the Hazel Avenue/U.S. 50 Westbound Ramps Intersection (Intersection 25)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1r: Participate in Improvements to the Hazel Avenue/U.S. 50 Westbound Ramps Intersection (Intersection 25). To ensure that the Hazel Avenue/U.S. 50 westbound ramps intersection operates at an acceptable LOS, an additional westbound right-turn lane must be installed on the off-ramp. Improvements to this intersection must be coordinated with Caltrans, the County, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1r would reduce the significant impact on Intersection 25 to a less-than-significant level by improving intersection LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, some of the identified improvements fall under the jurisdiction of Caltrans and the County. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
Impact 3.14-1s: Unacceptable LOS at the Grant Line Road/White Rock Road Intersection (Intersection 26)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1s: Participate in Improvements to the Grant Line Road/White Rock Road Intersection (Intersection 26). To ensure that the Grant Line Road/White Rock Road intersection operates at an acceptable LOS, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ A traffic signal must be installed at this intersection. ▶ One through lane and one dedicated right-turn lane must be added on the southbound approach. ▶ One left-turn lane and one shared left/through/right-turn lane must be added on the eastbound approach. ▶ One left-turn lane and one through lane must be added on the northbound approach. 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Improvements to this intersection must be coordinated with the County and other potentially affected oversight agencies.					
Implementation of Mitigation Measure 3.14-1s would reduce the significant impact on Intersection 26 to a less-than-significant level by improving intersection LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, the identified improvements fall under the jurisdiction of the County. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable . If the County cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.					
Impact 3.14-1t: Unacceptable LOS at the Kilgore Road/White Rock Road Intersection (Intersection 27)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1t: Participate in Improvements to the Kilgore Road/White Rock Road Intersection (Intersection 27). To ensure that the Kilgore Road/White Rock Road intersection operates at an acceptable LOS with implementation of development Phase 1, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ A free right-turn lane must be added on the northbound approach with an associated receiving lane (which would require widening of the White Rock Road crossing of the Folsom South Canal). ▶ One through lane must be added on the eastbound approach. ▶ Two left-turn lanes must be provided on the westbound approach. <p>For buildout of the specific plan under the three development alternatives, the improvements described above are required. In addition, one left-turn lane, two through lanes, and one right-turn lane must be added to the southbound approach. Alternatively, International Drive could be extended into and through the Rio del Oro project site if desired, to provide parallel capacity to White Rock Road (see discussion of the International Drive realignment under “Impact Analysis” above and in Impact 3.14-5 below).</p> <p>Although these required improvements would offset impacts associated with the project under buildout of the specific plan, this intersection would not operate acceptably. For this intersection to operate acceptably under buildout of all three development alternatives, International Drive would have to be extended into and through the project site in conjunction with the identified improvements.</p> <p>The crossing of the Folsom South Canal must be coordinated with the U.S. Bureau of Reclamation and appropriate oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1t would reduce the significant impact on Intersection 27 to a less-than-significant level by improving intersection LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. The identified extension of International Drive into and through the project site would require crossing the Folsom South Canal, which would involve other regulatory agencies. Therefore, neither the City nor the project applicant(s) would have control over the timing or implementation of this improvement because of the necessary crossing of the Folsom South Canal. Thus, this impact would remain significant and unavoidable. If the U.S. Bureau of Reclamation cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.14-1u: Unacceptable LOS on Mather Boulevard between Femoyer Street and Douglas Road (Roadway Segment 4)</p> <p>PP, HD, IM: Mitigation Measure 3.14-1u: Participate in Improvements to Mather Boulevard between Femoyer Street and Douglas Road (Roadway Segment 4). To ensure that Mather Boulevard operates at an acceptable LOS between Femoyer Street and Douglas Road, Femoyer Street must be widened to four lanes between Mather Boulevard and the proposed Zinfandel Drive extension, and the future Zinfandel Drive extension must be constructed as a four-lane facility from Femoyer Street to Douglas Road. Improvements to this roadway segment must be coordinated with the County.</p> <p>Implementation of Mitigation Measure 3.14-1u would reduce the significant impact on Roadway Segment 4 to a less-than-significant level by improving LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, the identified improvements fall under the jurisdiction of the County. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If the County cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>Impact 3.14-1v: Unacceptable LOS on Douglas Road between Mather Boulevard and Sunrise Boulevard (Roadway Segment 5)</p> <p>PP, HD, IM: Mitigation Measure 3.14-1v: Participate in Improvements to Douglas Road between Mather Boulevard and Sunrise Boulevard (Roadway Segment 5). To ensure that Douglas Road operates at an acceptable LOS between Mather Boulevard and Sunrise Boulevard, Douglas Road must be widened to four lanes. Improvements to this roadway segment must be coordinated with the County.</p> <p>Implementation of Mitigation Measure 3.14-1v would reduce the significant impact on Roadway Segment 5 to a less-than-significant level by improving LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, the identified improvements fall under the jurisdiction of the County and other regulatory agencies because of the Folsom South Canal crossing. Therefore, neither the City nor the project applicant(s) would have control over their timing or implementation. Thus, this impact would remain significant and unavoidable. If the County cooperates in allowing the improvement to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>Impact 3.14-1w: Unacceptable LOS on White Rock Road between Sunrise Boulevard and Grant Line Road (Roadway Segment 9)</p> <p>PP, HD, IM: Mitigation Measure 3.14-1w: Participate in Improvements to White Rock Road between Sunrise Boulevard and Grant Line Road (Roadway Segment 9). To ensure that White Rock Road operates at an acceptable LOS between Sunrise Boulevard and Grant Line Road, White Rock Road must be widened to four lanes. Improvements to this roadway segment must be coordinated with the County.</p> <p>Implementation of Mitigation Measure 3.14-1w would reduce the significant impact on Roadway Segment 9 to a less-than-significant level by improving LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. Although the majority of the roadway segment is within Rancho Cordova, the eastern portion of the roadway segment falls under the jurisdiction of the</p>	SU(m)	SU(m)	SU(m)	SU	NI

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
County. Therefore, neither the City nor the project applicant(s) would have control over the timing or implementation of this improvement. Thus, this impact would remain significant and unavoidable . If the County cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.					
Impact 3.14-1x: Unacceptable LOS on Zinfandel Drive between the U.S. 50 Eastbound Ramps and White Rock Road (Roadway Segment 15)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1x: Participate in Improvements to Zinfandel Drive between the U.S. 50 Eastbound Ramps and White Rock Road (Roadway Segment 15). Improvements must be made to ensure that Zinfandel Drive operates at an acceptable LOS between the U.S. 50 eastbound ramps and White Rock Road; specifically, this roadway segment should be widened to eight lanes. This improvement would allow the segment to operate at an acceptable LOS; however, it is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes.</p> <p>An alternative to this identified improvement is implementation of parallel capacity improvements, such as implementation of Rancho Cordova Parkway (and its connection to U.S. 50), extension of International Drive into and through the project site, and connectivity between International Drive and Old Placerville Road. Improvements to this roadway segment must be coordinated with the County.</p> <p>Implementation of Mitigation Measure 3.14-1x would reduce the significant impact on Roadway Segment 15 to a less-than-significant level by improving LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, widening the segment is inconsistent with the City’s Circulation Element/Plan. Additionally, the alternative improvements, consisting of connecting International Drive between Bradshaw Road and the project site and implementation of Rancho Cordova Parkway (and its connection to U.S. 50), fall partially under the jurisdiction of the County; therefore, neither the City nor the project applicant(s) can ensure their implementation. Given these conditions, this impact would remain significant and unavoidable. If the County cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
Impact 3.14-1y: Unacceptable LOS on Sunrise Boulevard between Gold Country Boulevard and Coloma Road (Roadway Segment 17)	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1y: Participate in Improvements to Sunrise Boulevard between Gold Country Boulevard and Coloma Road (Roadway Segment 17). Improvements must be made to improve operations on Sunrise Boulevard between Gold Country Boulevard and Coloma Road; specifically, this roadway segment should be widened to eight lanes. This improvement would offset the impacts of the project, but the segment would continue to operate at an unacceptable LOS. Additionally, although this improvement is consistent with the County Mobility Study, it is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes. Furthermore, without additional river crossings, there are no parallel capacity improvements to relieve Sunrise Boulevard on this segment.</p> <p>Implementation of Mitigation Measure 3.14-1y would partially reduce the significant impact on Roadway Segment 17 by offsetting impacts from development Phase 1 (Proposed Project Alternative) and from full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, implementation of this measure would not reduce the impact to a less-than-significant level, for the following reasons:</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> ▶ This improvement is inconsistent with the City’s Circulation Element/Plan. ▶ The potential for additional river crossings is limited. Any additional river crossings would require environmental review and would result in significant impacts on riparian vegetation. Additionally, implementing an additional river crossing would require acquisition of a significant number of existing homes, would have the potential to increase traffic volumes through residential neighborhoods, would require substantial funding, and would require cooperation of multiple agencies and jurisdictions. Additionally, neither the City nor the project applicant(s) would have control over mitigation implementation involving other jurisdictions (i.e., the County, Caltrans). ▶ The segment would continue to operate at an unacceptable LOS with the identified improvement. <p>For these reasons, the impact would remain significant and unavoidable.</p>					
<p>Impact 3.14-1z: Unacceptable LOS on Sunrise Boulevard between Coloma Road and the U.S. 50 Westbound Ramps (Roadway Segment 18).</p> <p>PP, HD, IM: Mitigation Measure 3.14-1z: Participate in Improvements to Sunrise Boulevard between Coloma Road and the U.S. 50 Westbound Ramps (Roadway Segment 18). Improvements must be made to improve operations on Sunrise Boulevard between Coloma Road and the U.S. 50 westbound ramps; specifically, this roadway segment should be widened to eight lanes. This improvement would offset the impacts of the project, but the segment would continue to operate at an unacceptable LOS. Additionally, although this improvement is consistent with the County Mobility Study, it is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes. Furthermore, without additional river crossings, there are no parallel capacity improvements to relieve Sunrise Boulevard on this segment.</p> <p>Implementation of Mitigation Measure 3.14-1z would partially reduce the significant impact on Roadway Segment 18 by offsetting impacts from development Phase 1 (Proposed Project Alternative) and from full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, implementation of this measure would not reduce the impact to a less-than-significant level for the same reasons as identified for Impact 3.14-1y above. Therefore, this impact would remain significant and unavoidable.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>Impact 3.14-1aa: Unacceptable LOS on Sunrise Boulevard between the U.S. 50 Eastbound Ramps and Folsom Boulevard (Roadway Segment 19).</p> <p>PP, HD, IM: Mitigation Measure 3.14-1aa: Participate in Improvements to Sunrise Boulevard between the U.S. 50 Eastbound Ramps and Folsom Boulevard (Roadway Segment 19). Improvements must be made to improve operations on Sunrise Boulevard between the U.S. 50 eastbound ramps and Folsom Boulevard; specifically, this roadway segment should be widened to eight lanes. This improvement would offset the impacts of the project, but the segment would continue to operate at an unacceptable LOS. Additionally, although this improvement is consistent with the County Mobility Study, it is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes.</p> <p>An alternative to this identified improvement is implementation of parallel capacity improvements, such as implementation of Rancho Cordova Parkway (and its connection to U.S. 50), which could improve operations on this segment and reduce the project’s impact.</p>	SU(m)	SU(m)	SU(m)	SU	NI

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Improvements to this roadway segment must be coordinated with Caltrans, Sacramento RT, and other potentially affected oversight agencies.</p> <p>Implementation of Mitigation Measure 3.14-1aa would partially reduce the significant impact on Roadway Segment 19 by offsetting impacts from development Phase 1 (Proposed Project Alternative) and from full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, implementation of this measure would not reduce the impact to a less-than-significant level. The alternative improvement, implementation of Rancho Cordova Parkway (and its connection to U.S. 50), could further reduce volumes on this segment and would reduce the impact to a less-than-significant level.</p> <p>The identified improvement is inconsistent with the City’s Circulation Element/Plan, and implementation of Rancho Cordova Parkway (and its connection to U.S. 50) falls under the jurisdiction of the County and Caltrans; therefore, neither the City nor the project applicant(s) can guarantee implementation of either the identified improvement or its alternative. Thus, this impact would remain significant and unavoidable. If Caltrans, Sacramento RT, the County, and other potentially affected agencies cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
<p>Impact 3.14-1bb: Unacceptable LOS on Sunrise Boulevard between Folsom Boulevard and White Rock Road (Roadway Segment 20).</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1bb: Participate in Improvements to Sunrise Boulevard between Folsom Boulevard and White Rock Road (Roadway Segment 20). Improvements must be made to improve operations on Sunrise Boulevard between Folsom Boulevard and White Rock Road; specifically, this roadway segment should be widened to eight lanes. This improvement would offset the impacts of the project, but the segment would continue to operate at an unacceptable LOS. Additionally, this improvement is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes.</p> <p>An alternative to this identified improvement is implementation of parallel capacity improvements, such as implementation of Rancho Cordova Parkway (and its connection to U.S. 50), which could improve operations on this segment and reduce the project’s impact.</p> <p>Improvements to this roadway segment must be coordinated with Caltrans and the County.</p> <p>Implementation of Mitigation Measure 3.14-1bb would partially reduce the significant impact on Roadway Segment 20 by offsetting impacts from development Phase 1 (Proposed Project Alternative) and from full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, implementation of this measure would not reduce the impact to a less-than-significant level. The alternative improvement, implementation of Rancho Cordova Parkway (and its connection to U.S. 50), could further reduce volumes on this segment to a less-than-significant level.</p> <p>The identified improvement is inconsistent with the City’s Circulation Element/Plan, and implementation of Rancho Cordova Parkway falls under the jurisdiction of Caltrans and the County; therefore, neither the City nor the project applicant(s) can guarantee implementation of either the identified improvement or its alternative. Thus, this impact would remain significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.14-1cc: Unacceptable LOS on Sunrise Boulevard between White Rock Road and Douglas Road (Roadway Segment 21).</p> <p>PP, HD, IM: Mitigation Measure 3.14-1cc: Participate in Improvements to Sunrise Boulevard between White Rock Road and Douglas Road (Roadway Segment 21). Improvements must be made to ensure that Sunrise Boulevard operates at an acceptable LOS between White Rock Road and Douglas Road; specifically, this roadway segment should be widened to eight lanes. With this improvement, this segment would operate at an acceptable LOS for the Baseline Plus Phase 1 and Baseline Plus Full Project Buildout scenarios under all three development alternatives. However, this improvement is inconsistent with the City’s Circulation Element/Plan.</p> <p>An alternative to this identified improvement is implementation of parallel capacity improvements, such as implementation of Rancho Cordova Parkway (and its connection to U.S. 50), which could improve operations on this segment and reduce the project’s impact.</p> <p>Improvements to this intersection must be coordinated with Caltrans and the County.</p> <p>Implementation of Mitigation Measure 3.14-1cc would reduce the significant impact on Roadway Segment 21 to a less-than-significant level by improving LOS under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. The alternative improvement, implementation of Rancho Cordova Parkway (and its connection to U.S. 50), could further reduce volumes on this segment.</p> <p>The identified improvement is inconsistent with the City’s Circulation Element/Plan because City policy requires roadway cross sections to be a maximum of six lanes, and implementation of Rancho Cordova Parkway falls under the jurisdiction of Caltrans and the County; therefore, neither the City nor the project applicant(s) can guarantee implementation of either the identified improvement or its alternative. Thus, this impact would remain significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>Impact 3.14-1dd: Unacceptable LOS at Sunrise Boulevard between SR 16 and Grant Line Road (Roadway Segment 22).</p> <p>PP, HD, IM: Mitigation Measure 3.14-1dd: Participate in Improvements to Sunrise Boulevard between SR 16 and Grant Line Road (Roadway Segment 22). To ensure that Sunrise Boulevard operates at an acceptable LOS between SR 16 and Grant Line Road, this roadway segment must be widened to four lanes. This improvement is included within the County’s development fee program. If this improvement is implemented before development Phase 1 of the Rio del Oro project, then the project impact at this intersection would be reduced to a less-than-significant level.</p> <p>Improvements to this roadway segment must be coordinated with the County.</p> <p>Implementation of Mitigation Measure 3.14-1dd would reduce the significant impact on Roadway Segment 22 to a less-than-significant level by providing acceptable operations under development Phase 1 (Proposed Project Alternative) and at full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, because the improvement falls under the jurisdiction of the County, neither the City nor the project applicant(s) can guarantee its implementation. Thus, this impact would remain significant and unavoidable. If the County cooperates in allowing the improvements to move forward, the</p>	SU(m)	SU(m)	SU(m)	SU	NI

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.					
Impact 3.14-1ee: Unacceptable LOS at Hazel Avenue between Winding Way and the U.S. 50 Westbound Ramps (Roadway Segment 23).	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1ee: Participate in Improvements to Hazel Avenue between Winding Way and the U.S. 50 Westbound Ramps (Roadway Segment 23). To improve operations on Hazel Avenue between Winding Way and the U.S. 50 westbound ramps, this roadway segment must be widened to six lanes. This improvement is included within the County’s development fee program and is expected to receive Measure A funding.</p> <p>With the identified improvement, this segment would still operate at an unacceptable LOS for the Baseline Plus Phase 1 and Baseline Plus Full Project Buildout scenarios under all three development alternatives, but the improvement would offset the amount of traffic the project adds to the segment and would reduce the project impact to a less-than-significant level.</p> <p>Improvements to this roadway segment must be coordinated with the County.</p> <p>Implementation of Mitigation Measure 3.14-1ee would reduce the significant impact on Roadway Segment 23 to a less-than-significant level by offsetting impacts from development Phase 1 (Proposed Project Alternative) and from full project buildout under the Proposed Project, High Density, and Impact Minimization Alternatives. However, because this improvement falls under the jurisdiction of the County, neither the City nor the project applicant(s) can guarantee its implementation. Thus, the impact would remain significant and unavoidable. If the County cooperates in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
Impact 3.14-1ff: Unacceptable LOS at U.S. 50 between Mather Field Road and Zinfandel Drive (Freeway Segment 27), and between Sunrise Boulevard and Hazel Avenue (Freeway Segment 29).	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1ff: Participate in Improvements to U.S. 50 between Mather Field Road and Zinfandel Drive (Freeway Segment 27) and U.S. 50 between Sunrise Boulevard and Hazel Avenue (Freeway Segment 29). To ensure that U.S. 50 operates at an acceptable LOS between Mather Field Road and Zinfandel Drive and between Sunrise Boulevard and Hazel Avenue, the following improvements to the U.S. 50 corridor are required:</p> <ul style="list-style-type: none"> ▶ Ramp metering must be added on the Mather Field Road and Zinfandel Drive eastbound on-ramps. ▶ An auxiliary lane must be constructed from Mather Field Road and Sunrise Boulevard. ▶ Traffic-signal timing at freeway interchanges must be coordinated with adjacent City intersections to minimize impacts of vehicle queue spillback onto U.S. 50. ▶ Parallel facilities to U.S. 50 must be constructed, including improvements to SR 16, extension of International Drive into and through the project site, extension of Kiefer Boulevard, construction of Easton Valley Parkway, and connectivity of International Drive to Old Placerville Road. ▶ HOV lanes must be extended from Sunrise Boulevard to downtown Sacramento (or, as an interim project, to Watt Avenue). ▶ HOV enhancements to existing interchanges must be provided, such as bypass lanes at existing metered on-ramps. 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Improvements to these freeway segments must be coordinated with Caltrans and the County.</p> <p>Implementation of Mitigation Measure 3.14-1ff would reduce the significant impacts on Freeway Segments 27 and 29 to a less-than-significant level under the Proposed Project, Impact Minimization, and High Density Alternatives under development Phase 1 and at full project buildout.</p> <p>The City's CIP has identified some of the improvements identified above. Caltrans is conducting the U.S. 50 HOV Lane Project Plus Community Enhancement Project, which will evaluate the extension of eastbound and westbound HOV lanes on U.S. 50 to downtown Sacramento.</p> <p>Several of the identified improvements fall under the jurisdiction of Caltrans or the County; therefore, neither the City nor the project applicant(s) can guarantee their implementation. Given these conditions, this impact remains significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
<p>Impact 3.14-1gg: Unacceptable LOS at Douglas Road between Sunrise Boulevard and Jaeger Road (Roadway Segment 31).</p>	LTS	LTS(m)	LTS	SU	NI
<p>HD: Mitigation Measure 3.14-1gg: Participate in Improvements to Douglas Road between Sunrise Boulevard and Jaeger Road (Roadway Segment 31).</p> <p>To improve operations on Douglas Road between Sunrise Boulevard and Jaeger Road, this roadway segment must be widened to six lanes. This improvement is consistent with the City's Circulation Element/Plan.</p> <p>This improvement is included within the <i>SunRidge Specific Plan Public Facilities Financing Plan</i> and zoning conditions as well as the City's CIP.</p> <p>PP, IM, NP: The roadway segment would operate at an acceptable level.</p>					
<p>Impact 3.14-1hh: Unacceptable LOS at Sunrise Boulevard between Douglas Road and Kiefer Boulevard (Roadway Segment 33).</p>	LTS(m)	LTS(m)	LTS(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1hh: Participate in Improvements to Sunrise Boulevard between Douglas Road and Kiefer Boulevard (Roadway Segment 33). To ensure that Sunrise Boulevard operates at an acceptable LOS between Douglas Road and Kiefer Boulevard, this roadway segment must be widened to six lanes consistent with the City's Circulation Element/Plan and CIP.</p>					
<p>Impact 3.14-1ii: Unacceptable LOS at Sunrise Boulevard between Kiefer Boulevard and SR 16 (Roadway Segment 34).</p>	LTS(m)	LTS(m)	LTS(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1ii: Participate in Improvements to Sunrise Boulevard between Kiefer Boulevard and SR 16 (Roadway Segment 34). To ensure that Sunrise Boulevard operates at an acceptable LOS between Kiefer Boulevard and SR 16, this roadway segment must be widened to six lanes consistent with the City's Circulation Element/Plan and CIP.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-1jj: Unacceptable LOS at Various Merge and Diverge Segments of U.S. 50.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-1jj: Participate in Improvements to Various Merge and Diverge Segments of U.S. 50. To ensure that the U.S. 50 merge and diverge areas operate at an acceptable LOS, the following improvements to the U.S. 50 corridor are required:</p> <ul style="list-style-type: none"> ▶ Ramp metering must be added on the Mather Field Road and Zinfandel Drive eastbound on-ramps. ▶ An auxiliary lane must be constructed from Mather Field Road and Sunrise Boulevard. ▶ Traffic-signal timing at freeway interchanges must be coordinated with adjacent City intersections to minimize impacts of vehicle queue spillback onto U.S. 50. ▶ Parallel facilities to U.S. 50 must be constructed, including improvements to SR 16, extension of International Drive into and through the project site, extension of Kiefer Boulevard, construction of Easton Valley Parkway, and connectivity of International Drive to Old Placerville Road. ▶ HOV lanes must be extended from Sunrise Boulevard to downtown Sacramento (or, as an interim project, to Watt Avenue). ▶ HOV enhancements to existing interchanges must be provided, such as bypass lanes at existing metered on-ramps. <p>Improvements to these merge and diverge segments of U.S. 50 must be coordinated with Caltrans and the County.</p> <p>Implementation of Mitigation Measure 3.14-1jj would reduce the significant impacts on U.S. 50 freeway merge/diverge/weave areas to a less-than-significant level under the Proposed Project, High Density, and Impact Minimization Alternatives under development Phase 1 and at full project buildout.</p> <p>The City’s CIP has identified some of the improvements identified above. Caltrans is conducting the U.S. 50 HOV Lane Project Plus Community Enhancement Project, which will evaluate the extension of eastbound and westbound HOV lanes on U.S. 50 to downtown Sacramento.</p> <p>Several of the identified improvements fall under the jurisdiction of Caltrans or the County; therefore, neither the City nor the project applicant(s) can ensure that these improvements would be completed. Given these conditions, this impact remains significant and unavoidable. If Caltrans and the County cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually would be reduced to a less-than-significant level in the long term.</p>					
Impact 3.14-2: Increased Demand for Single-Occupant Automobile Travel in the Project Area.	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	SU	No Direct, No Indirect
<p>PP, HD, IM: Mitigation Measure 3.14-2: Develop Commercial Support Services and Mixed-use Development Concurrent with Housing Development, and Develop and Provide Options for Alternative Transportation Modes. The project applicant(s) for all project phases shall develop commercial and mixed-use development concurrent with housing development, to the extent feasible in light of market realities and other considerations, to internalize vehicle trips. Pedestrian and bicycle facilities shall be implemented to the satisfaction of the City Public Works Department. To further minimize impacts from the increased demand on area roadways and intersections, the project applicant(s) for all project phases shall develop and implement safe and secure bicycle parking at schools and commercial centers to promote alternative transportation uses and reduce the volume of single-occupancy vehicles using area roadways and intersections.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Timing: Before approval of improvement plans for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the project would continue to add single-occupant vehicles in the area despite the potential of the mitigation measure to substantially reduce the number of single-occupant vehicles.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.14-3: Increased Demand for Alternative Modes of Transportation.</p>	<p>Direct & SU(m), No Indirect</p>	<p>Direct & SU(m), No Indirect</p>	<p>Direct & SU(m), No Indirect</p>	<p>SU</p>	<p>No Direct, No Indirect</p>
<p>PP, HD, IM: Mitigation Measure 3.14-3a: Participate in Capital Improvements for Transit Service. The project applicant(s) for all project phases shall participate in capital improvements for transit service, providing transit-related services through annexation to the City's Transit-Related Services Special Tax Area and payment of the tax. Capital improvements for transit services will be part of the City's Transportation CIP and will include the construction and operation of the streetcar system, purchase of a shuttle fleet, and construction of a maintenance facility. The project's fair-share participation and the associated timing of the improvements shall be identified in the project conditions of approval and/or the project's development agreement. Improvements shall be coordinated, as necessary, with Sacramento RT. shall be satisfied through payment of the transportation fee. Capital improvement costs for on-site ancillary facilities are not in the City Transportation CIP. To fulfill the need for on-site facilities, the project applicant(s) shall provide on-site transfer and connection facilities at appropriate locations as part of site development plans. Transfer facilities shall be provided at major arterial intersections. All transfer, fare collection, and information facilities shall be provided at land uses that are major transit transfer points or destinations. These sites include major commercial and recreational land uses.</p> <p>Timing: As a condition of project approval and/or as a condition of the development agreement for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p> <p>Mitigation Measure 3.14-3b: Coordinate with the 50 Corridor Transportation Management Association and Comply with the City of Rancho Cordova Transportation System Management Ordinance. The project applicant(s) for all project phases shall coordinate with the 50 Corridor Transportation Management Association and comply with the City of Rancho Cordova transportation system management ordinance.</p> <p>Timing: Concurrent with construction for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because neither the City nor the project applicant(s) can guarantee implementation of increased transit service within Rancho Cordova.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-4: Inconsistency of the Rio del Oro Specific Plan with the City’s Adopted General Plan.	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	SU	No Direct, No Indirect
<p>PP, HD, IM: Mitigation Measure 3.14-4: Modify Rio del Oro Specific Plan for the High Density and Impact Minimization Alternatives to be Consistent with the City’s Adopted General Plan. The project applicant(s) for all project phases shall modify the Rio del Oro Specific Plan to be consistent with the City’s General Plan.</p> <p>Timing: As a condition of project approval and/or as a condition of the development agreement for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p>					
Impact 3.14-5: Potential Impacts Associated with Alternative Land Uses within the Overflight Zone of the Rio del Oro Specific Plan Area.	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	SU	No Direct or Indirect
<p>PP, HD, IM: Require Individual Transportation Impact Studies for Alternative Land Uses in the Overflight Zone and Implement All Identified Transportation Improvements. As development occurs in the overflight zone, the project applicant(s) for any proposed alternative land use shall complete specific transportation impact studies to the satisfaction of the City’s Public Works Department. Impacts shall be identified using methodologies adopted by the City or consistent with those identified in this DEIR/DEIS. Improvements identified as a result of the individual transportation impact studies shall be implemented by the project applicant(s) for all project phases.</p> <p>Timing: As development applications come forth for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p>					
Cumulative					
<p>*Note that all cumulative impacts of the NF Alternative (No Federal Action) would be inconsistent with the City General Plan Circulation Element/Plan. This alternative would result in greater impacts on transportation infrastructure outside the Rio del Oro Specific Plan area. No feasible mitigation measures are available to reduce impacts resulting from implementation of the NF Alternative to a less than significant level. Therefore, impacts under the NF Alternative would remain significant and unavoidable.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-6: Potential Impacts Associated with the City’s Transportation Impact Fee Program.	Direct & SU, No Indirect	Direct & SU, No Indirect	Direct & SU, No Indirect	SU	Direct & PS, No Indirect
<p>PP, HD, IM, NP: Mitigation Measure 3.14-6: Pay Fair-Share Cost of Identified Improvements that Are Not Fully Funded by the City’s Fee Program. The project applicant(s) for all project phases shall provide fair-share contributions to the City’s transportation impact fee program to aid in bridging the program’s funding shortfall. However, ultimate funding of the improvements cannot be guaranteed (as it would require funding from other developments in the area). <u>Project contributions to the City’s transportation impact fee program shall be identified in the project’s public facilities financing plan associated with Tier 2 entitlements.</u></p> <p>Timing: <u>As part of Tier 2 entitlements and before any physical development of the property (excluding on-site wetland fill and mitigation activities).</u>As a condition of project approval and/or as a condition of the development agreement for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p>					
Impact 3.14-7: Increases to Peak-Hour and Daily Traffic Volumes, Resulting in Unacceptable Levels of Service, under Cumulative (2030) Conditions.	Direct & S, No Indirect	Direct & S, No Indirect	Direct & S, No Indirect	SU	No Direct, No Indirect
<p>Mitigation Measure: Common to All Impacts under Impact 3.14-7</p> <p>To avoid repetition, the information contained in the following mitigation measure applies to all other mitigation measures required under Impact 3.14-7. Note that no mitigation measures are required for the No Project Alternative because, as described above, no direct or indirect impacts would occur.</p> <p>PP, HD, IM: The project applicant(s) for all project phases shall participate in the necessary improvements identified in all of the following mitigation measures. The project’s fair-share participation and the associated timing of the improvements shall be identified in <u>Tier 2 entitlements for the project and before any physical development of the property and will amend the project conditions of approval and in the mitigation monitoring and reporting program for the project to include these participation and timing details for traffic improvements.</u> or in conjunction with and as an appendix to the Rio del Oro Specific Plan (see mitigation measures following each identified impact).</p> <p>The timing and enforcement (described below) would be the same for all identified mitigation measures associated with Impact 3.14-7.</p> <p>Timing: <u>As part of Tier 2 entitlements and before any physical development of the property (excluding on-site wetland fill and mitigation activities).</u> a condition of project approval and/or as a condition of the development agreement for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works Department.</p> <p>Please note that the improvements described in each of the following mitigation measures have not been designed, and therefore, project-specific impacts as a result of these improvements cannot be precisely identified or quantified.</p> <p>If need be, site-specific impacts of the identified improvements would be assessed pursuant to CEQA requirements when specific intersection and roadway improvement plans are developed, separate from the Rio del Oro DEIR/DEIS. Any such necessary environmental review would be completed before final approval</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>of the improvements identified in the mitigation measures. No such additional review may be necessary, however, if the effects of such improvements are consistent with what can generally be expected of such improvements, as set forth immediately below.</p> <p>Based on review of existing available environmental documentation, field review at a reconnaissance level, and review of aerial photography, it is anticipated that, at worst, the construction of these intersection and roadway improvements could directly adversely affect wetland resources and associated grassland habitat area and could result in construction-related environmental effects, including but not limited to:</p> <ul style="list-style-type: none"> ▶ impacts related to construction traffic, noise, air quality, water quality, and drainage; ▶ impacts on cultural resources; and ▶ impacts on special-status plants and animals and their habitats. <p>In addition to construction-related impacts, implementation of these improvements could result in long-term effects on water quality and drainage. The impacts that could arise from the planned improvements will be measured using the significance thresholds identified in each section of Chapter 3 of this DEIR/DEIS.</p> <p>Once a planned roadway is designed, the City will retain a qualified biologist to conduct a reconnaissance survey to determine type(s) of habitat to be removed, and whether wetlands or special-status species are present. The City will also conduct a cultural resources records search to determine whether any known cultural resources are present.</p> <p>The mitigation measures recommended in Chapter 3 of this DEIR/DEIS would be applied (where applicable) to mitigate any such effects, if significant, to less-than-significant levels. For example, measures will be implemented to ensure no net loss of wetlands. Best management practices and Sacramento Metropolitan Air Quality Management District measures will be implemented for water and air quality effects, and preconstruction surveys would be performed where sensitive habitat is present (and if special-status species or habitat is present, the biological resources protection measures would be implemented). The relocation of any utility pole or other utilities will be coordinated with the appropriate service provider to ensure that there would be no impact on the service provider. Additionally, if permits or other authorization are required, they will be secured and the conditions will be followed.</p> <p>For improvements to the following intersections and roadway improvements, the following impacts (in addition to the above) could result from implementation of required improvements:</p> <ul style="list-style-type: none"> ▶ Direct impacts on LRT service in the area—Sunrise Boulevard/Folsom Boulevard (Intersection 19) ▶ Direct impacts from required grade separation structure—Sunrise Boulevard/Zinfandel Drive and Hazel Avenue/Folsom Boulevard intersections (Intersections 22 and 23, respectively) ▶ Direct impacts on the Folsom South Canal—Eagles Nest Road/Kiefer Boulevard and Sunrise Boulevard/International Drive intersections (Intersections 28 and 29, respectively) ▶ Direct impacts from required new river crossings of the American River—Sunrise Boulevard between Gold Country Boulevard and Coloma Road and Sunrise Boulevard between Coloma Road and the U.S. 50 westbound ramps (Roadway Segments 17 and 18, respectively) ▶ Direct impacts from potential removal of approximately 80 utility poles, 60 street lights, approximately 50 large trees, and commercial/industrial property, resulting from improvements to Sunrise Boulevard between Folsom Boulevard and White Rock Road (Roadway Segment 20) 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>▶ Direct impacts from potential removal of approximately 60 utility poles, 100 street lights, approximately 40 large trees (primarily oak and landscaped trees), and commercial/industrial property, resulting from improvements to Sunrise Boulevard between White Rock Road and Douglas Road (Roadway Segment 21)</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.14-7a: Unacceptable LOS at the SR 16/Eagles Nest Road Intersection (Intersection 2) under Cumulative (2030) Conditions.</p>	No Direct or Indirect	SU(m)	No Direct or Indirect	SU	No Direct or Indirect
<p>HD: Mitigation Measure 3.14-7a: Participate in Improvements to the SR 16/Eagles Nest Road Intersection (Intersection 2). To ensure that the SR 16/Eagles Nest Road intersection operates at an acceptable LOS D or better, the northbound approach must be reconfigured to consist of one left-turn lane, two through lanes, and one dedicated right-turn lane.</p> <p>Improvements to the SR 16/Eagles Nest Road intersection are contained within the <i>SunRidge Specific Plan Public Facilities Financing Plan</i> and zoning conditions. The CEQA Findings of Fact and Statement of Overriding Considerations for the Sunrise Douglas Community Plan/SunRidge Specific Plan Project state that physical improvement of this intersection is feasible. Implementation of these improvements would reduce traffic impacts on this intersection.</p> <p>Improvements to this intersection must be coordinated with Caltrans and the County.</p> <p>PP, IM, NP: No mitigation measures are required.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the improvements identified above fall under the jurisdiction of Caltrans and the County, and neither the City nor the project applicant(s) would have control over their timing or implementation.</p>					
<p>Impact 3.14-7b: Unacceptable LOS at the Grant Line Road/Sunrise Boulevard Intersection (Intersection 6) under Cumulative (2030) Conditions.</p>	SU(m)	SU(m)	SU(m)	SU	No Direct or Indirect
<p>PP, HD, IM: Mitigation Measure 3.14-7b: Participate in Improvements to the Grant Line Road/Sunrise Boulevard Intersection (Intersection 6). To ensure that the Grant Line Road/Sunrise Boulevard intersection operates at an acceptable LOS D or better, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ The northbound approach must be reconfigured to consist of one left-turn lane and a shared through/right-turn lane. ▶ The southbound approach must be reconfigured to consist of one left-turn lane, one through lane, and two right-turn lanes with overlap right-turn signal phase. ▶ The eastbound approach must be reconfigured to consist of two left-turn lanes, two through lanes, and a shared through/right-turn lane. ▶ The westbound approach must be reconfigured to consist of one left-turn lane, two through lanes, and a shared through/right-turn lane. <p>Interim improvements to the Grant Line Road/Sunrise Boulevard intersection are contained within the Elk Grove West Vineyard Plan, with ultimate improvements contained within the <i>Vineyard Springs Comprehensive Plan Public Financing Plan</i>. These intersection improvements must be coordinated with the County.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the improvements identified above fall under the jurisdiction of the County, and neither the City nor the project applicant(s) would have control over their timing or implementation.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-7c: Unacceptable LOS at the Grant Line Road/Kiefer Boulevard Intersection (Intersection 7) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7c: Participate in Improvements to the Grant Line Road/Kiefer Boulevard Intersection (Intersection 7). To ensure that the Grant Line Road/Kiefer Boulevard intersection operates at an acceptable LOS D or better, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ A traffic signal must be installed at this intersection. The southbound approach must be reconfigured to consist of one left-turn lane, three through lanes, and one dedicated right-turn lane. ▶ The eastbound approach must be reconfigured to consist of one left-turn lane, one through lane, and one dedicated right-turn lane. ▶ The westbound approach must be reconfigured to consist of one left-turn lane, one through lane, and one right-turn lane. <p>Improvements to this intersection must be coordinated with the County.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because portions of the identified improvements of this intersection fall under the jurisdiction of the County, and neither the City nor the project applicant(s) would have control over their timing or implementation.</p>					
Impact 3.14-7d: Unacceptable LOS at the Grant Line Road/Douglas Road Intersection (Intersection 8) under Cumulative (2030) Conditions.	LTS(m)	LTS(m)	LTS(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7d: Participate in Improvements to the Grant Line Road/Douglas Road Intersection (Intersection 8). To ensure that the Grant Line Road/Douglas Road intersection operates at an acceptable LOS D or better, a traffic signal must be installed at this intersection. Improvements to this intersection are contained within the <i>SunRidge Specific Plan Public Financing Plan</i>.</p>					
Impact 3.14-7e: Unacceptable LOS at the Sunrise Boulevard/Douglas Road Intersection (Intersection 9) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7e: Participate in Improvements to the Sunrise Boulevard/Douglas Road Intersection (Intersection 9). To improve LOS at the Sunrise Boulevard/Douglas Road intersection, all approaches must be reconfigured to consist of two left-turn lanes, three through lanes, and one right-turn lane.</p> <p>However, even with these improvements, this intersection would continue to operate at an unacceptable LOS. For this intersection to operate at an acceptable LOS, additional roadway connectivity is required. To achieve this connectivity, the Kiefer Boulevard Extension between Rancho Cordova and Sacramento must be implemented. Additional intersection improvements could be implemented consistent with the City’s Circulation Element/Plan, including partial grade separation of the intersection and/or aggressive at-grade treatments such as triple left-turn lanes, enhanced-capacity right-turn treatments, or conversion into a continuous-flow intersection.</p> <p>Improvements to this intersection are contained within the <i>SunRidge Specific Plan Public Financing Plan</i>, but this Public Financing Plan would not be able to fund all of the improvements described above. These intersection improvements must be coordinated with the County.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the required additional connectivity on Kiefer Boulevard between Rancho Cordova and Sacramento falls under the jurisdiction of the County, and neither the City nor the project applicant(s) would have control over the timing or implementation of this improvement. Furthermore, the feasibility of the aggressive at-grade or partial grade-separated alternatives has not been determined, as no specific designs have been developed and environmental constraints have not been identified.</p>					
<p>Impact 3.14-7f: Unacceptable LOS at the Mather Field Road/U.S. 50 Eastbound Ramps Intersection (Intersection 12) under Cumulative (2030) Conditions.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7f: Participate in Improvements to the Mather Field Road/U.S. 50 Eastbound Ramps Intersection (Intersection 12). To ensure that the Mather Field Road/U.S. 50 eastbound ramps intersection operates at an acceptable LOS D or better, the eastbound approach must be reconfigured to include an additional right-turn lane. Improvements to this intersection are identified in the City’s Circulation Element/Plan and included in the City’s CIP, and must be coordinated with Caltrans.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the improvement identified above falls under the jurisdiction of Caltrans, and neither the City nor the project applicant(s) would have control over its timing or implementation.</p>					
<p>Impact 3.14-7g: Unacceptable LOS at Mather Field Road/International Drive (Intersection 13) under Cumulative (2030) Conditions.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7g: Participate in Improvements at the Mather Field Road/International Drive Intersection (Intersection 13). Southbound left-turn and westbound right-turn volumes at the Mather Field Road/International Drive intersection are substantial enough that additional lanes at this intersection would not reduce impacts at the intersection; therefore, the intersection would continue to operate at an unacceptable LOS E or LOS F. However, additional roadway connectivity in the area, through measures such as implementation of the Kiefer Boulevard Extension to Sacramento, extension of Routier Road to the south, completion of the International Drive–Old Placerville Road connection, and construction of the potential tunnel under Mather Field, has the potential to shift traffic volumes to reduce traffic impacts at the intersection. These additional roadway connectivity measures are identified in the City’s Circulation Element/Plan and included in the City’s CIP. Implementation of these improvements would assist in reducing traffic impacts on this intersection by providing acceptable operations.</p> <p>Improvements to this intersection must be coordinated with the County and other regulatory agencies because of the proximity of some of these improvements to Mather Field.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the Kiefer Boulevard Extension and International Drive–Old Placerville Road connection fall under the jurisdiction of the County, and the Routier Road extension and tunnel construction under Mather Field would require coordination with other regulatory agencies because of their proximity to the airstrip. Therefore, neither the City nor the project applicant(s) would have control over the timing or implementation of all the identified improvements.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-7h: Unacceptable LOS at the Zinfandel Drive/International Drive Intersection (Intersection 14) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7h: Participate in Improvements to the Zinfandel Drive/International Drive Intersection (Intersection 14) Improvements must be made to improve LOS at the Zinfandel Drive/International Drive intersection. Specifically, this intersection should be reconfigured to provide three left-turn lanes, four through lanes, and one right-turn lane. Additionally, capacity enhancement is needed for the eastbound right-turn movement. These improvements would reduce the cumulative impact caused by the proposed project and alternatives under consideration by providing acceptable LOS. However, widening International Drive to four through lanes is inconsistent with the City’s Circulation Element/Plan because City policy requires roadway cross sections of six lanes or fewer.</p> <p>To be consistent with the City’s Circulation Element/Plan, aggressive at-grade improvements are required, such as partial grade separation, capacity-enhancing right-turn treatments on all approaches, or implementation of a continuous-flow intersection. Additionally, improved roadway connectivity, such as the extension of Kiefer Boulevard, International Drive–Old Placerville Road connection, and/or construction of the tunnel under Mather Field would shift traffic volumes and reduce traffic at the intersection.</p> <p>The additional roadway connections described above and aggressive at-grade intersection treatments are identified in the City’s Circulation Element/Plan and included in the City’s CIP. Implementation of these improvements would assist in reducing traffic impacts on this intersection by providing acceptable operations. Improvements to this intersection must be coordinated with the County and other regulatory agencies (such as FAA) because of the proximity of some of these improvements to Mather Field.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the Kiefer Boulevard Extension and International Drive–Old Placerville Road connection are under the jurisdiction of the County, and the Routier Road extension and tunnel construction under Mather Field would require coordination with other regulatory agencies (such as FAA) because of their proximity to the airstrip. Furthermore, the aggressive at-grade treatments have not been designed, and they could have geometric and/or environmental constraints that may make the treatments infeasible. Therefore, neither the City nor the project applicant(s) would have control over the timing or implementation of all the identified improvements.</p>					
Impact 3.14-7i: Unacceptable LOS at the Zinfandel Drive/White Rock Road Intersection (Intersection 15) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7i: Participate in Improvements to the Zinfandel Drive/White Rock Road Intersection (Intersection 15). Improvements required to provide acceptable LOS at the Zinfandel Drive/White Rock Road intersection consist of three left-turn lanes, four through lanes, and one right-turn lane on all approaches; and capacity enhancement treatments on the westbound right-turn movement.</p> <p>Improvements to this intersection are identified in the City’s Circulation Element/Plan and included in the City’s CIP. Implementation of the identified improvements would assist in reducing traffic impacts on this intersection by providing acceptable LOS. However, these improvements include widening the facility to more than six lanes, which is inconsistent with the City’s General Element/Plan. Alternatively, partial grade separation could be implemented consistent with the City’s Circulation Element/Plan and CIP; however, aggressive at-grade treatments such as partial grade separation have not been designed, and they could have geometric and/or environmental constraints that may make the treatments infeasible.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because one improvement is inconsistent with the City’s General Element/Plan, and the other (partial grade separation) has not been designed, the improvements may be infeasible as a result of consistency, geometric, and/or environmental constraints, and neither the City nor the project applicant(s) would have control over the timing or implementation of all the identified improvements.</p>					
<p>Impact 3.14-7j: Unacceptable LOS at the Zinfandel Drive/U.S. 50 Eastbound Ramps Intersection (Intersection 16) under Cumulative (2030) Conditions.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7j: Participate in Improvements to the Zinfandel Drive/U.S. 50 Eastbound Ramps Intersection (Intersection 16). To ensure that the Zinfandel Drive/U.S. 50 eastbound ramps intersection operates at an acceptable LOS D or better, the following improvements are required:</p> <ul style="list-style-type: none"> ▶ The northbound approach must be reconfigured to consist of four through lanes and a shared through/right-turn lane. ▶ The southbound approach must be reconfigured to consist of three through lanes and a free right-turn lane. ▶ The eastbound approach must be reconfigured to consist of three left-turn lanes, two through lanes, and a free right-turn lane. ▶ The westbound approach must be reconfigured to consist of three right-turn lanes. <p>Improvements to this intersection are identified in the City’s Circulation Element/Plan and included in the City’s CIP. Implementation of these improvements would assist in reducing traffic impacts on this intersection by providing acceptable operation. Intersection improvements must be coordinated with Caltrans.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvements fall under the jurisdiction of Caltrans, and neither the City nor the project applicant(s) would have control over their timing or implementation.</p>					
<p>Impact 3.14-7k: Unacceptable LOS at the Sunrise Boulevard/White Rock Road Intersection (Intersection 18) under Cumulative (2030) Conditions.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7k: Participate in Improvements to the Sunrise Boulevard/White Rock Road Intersection (Intersection 18). To ensure that the Sunrise Boulevard/White Rock Road intersection operates at an acceptable LOS, grade separation must be implemented at this intersection.</p> <p>Some funding for intersection improvements to this intersection is identified in the <i>Mather Field Specific Plan Public Financing Plan</i> (Zinfandel Drive Extension), and grade separation of the intersection is in the City’s Circulation Element/Plan and included in the City’s CIP. The grade separation treatment has not been designed, however, and it could have geometric and/or environmental constraints that may make the treatment infeasible. No other feasible improvements are available at this intersection to ensure that it operates at an acceptable level.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the feasibility of grade separation at this location has not been determined, these identified improvements may not be feasible, and neither the City nor the project applicant(s) would have control over the timing or implementation of the identified improvement.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-7l: Unacceptable LOS at the Sunrise Boulevard/Folsom Boulevard Intersection (Intersection 19) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7l: Participate in Improvements to the Sunrise Boulevard/Folsom Boulevard Intersection (Intersection 19). Improvements must be made to ensure that the Sunrise Boulevard/Folsom Boulevard intersection operates at an acceptable LOS D or better. Specifically, all of the following improvements should be made:</p> <ul style="list-style-type: none"> ▶ The northbound approach should be reconfigured to consist of three left-turn lanes, four through lanes, and one right-turn lane. ▶ The southbound approach should be reconfigured to consist of three left-turn lanes, four through lanes, and one right-turn lane. ▶ The eastbound approach should be reconfigured to consist of two left-turn lanes, two through lanes, and one right-turn lane. ▶ The westbound approach should be reconfigured to consist of two left-turn lanes, one through lane, and one right-turn lane. <p>These improvements must be coordinated with Sacramento RT. The identified improvements would provide acceptable operations at this intersection. However, they may be infeasible because of geometric constraints at this intersection caused by the grade-separated LRT tracks. No other feasible improvements are available, and there is no assurance that the required improvements would be implemented.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because of the potential for infeasibility of the identified improvements.</p>					
Impact 3.14-7m: Unacceptable LOS at the Sunrise Boulevard/U.S. 50 Westbound Ramps Intersection (Intersection 21) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7m: Participate in Improvements to the Sunrise Boulevard/U.S. 50 Westbound Ramps Intersection (Intersection 21). To ensure that the Sunrise Boulevard/U.S. 50 westbound ramps intersection operates at an acceptable LOS D or better, the northbound and southbound approaches must be reconfigured to consist of three through lanes and one free (uncontrolled) right-turn lane; and the westbound approach must be reconfigured to consist of two left-turn lanes and a free right-turn lane with an adequate receiving lane on Sunrise Boulevard. Improvements to this intersection must be coordinated with Caltrans.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvements fall under the jurisdiction of Caltrans, and neither the City nor the project applicant(s) would have control over their timing or implementation.</p>					
Impact 3.14-7n: Unacceptable LOS at the Sunrise Boulevard/Zinfandel Drive Intersection (Intersection 22) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7n: Participate in Improvements to the Sunrise Boulevard/Zinfandel Drive Intersection (Intersection 22). Improvements must be made to ensure that the Sunrise Boulevard/Zinfandel Drive intersection operates at an acceptable LOS; specifically, the northbound and southbound approaches should be reconfigured to consist of an additional through lane. These at-grade improvements are consistent with the County Mobility Study; however, they would be inconsistent with the City's Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes or fewer.</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>An alternative to this improvement that is consistent with the City’s Circulation Element/Plan and associated CIP is implementation of grade separation at this intersection. However, the grade-separation treatment has not been designed, and it could have geometric and/or environmental constraints that may make the treatment infeasible.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvement is inconsistent with the City’s Circulation Element Plan; and due to the potential for infeasibility of the identified alternative improvements.</p>					
<p>Impact 3.14-7o: Unacceptable LOS at the Hazel Avenue/Folsom Boulevard Intersection (Intersection 23) under Cumulative (2030) Conditions.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7o: Participate in Improvements to the Hazel Avenue/Folsom Boulevard Intersection (Intersection 23). For the Hazel Avenue/Folsom Boulevard intersection to operate at an acceptable LOS D or better, grade separation of the intersection is required. This improvement is consistent with the City’s Circulation Element/Plan; however, the grade-separation treatment has not been designed, and it could have geometric and/or environmental constraints that may make the treatment infeasible.</p> <p>Improvements to this intersection must be coordinated with the County.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the alternative improvement may have as-yet-unknown potentially significant impacts, and because the intersection is under the jurisdiction of the County, and neither the City nor the project applicant(s) would have control over the timing or implementation of the improvement necessary to provide acceptable operations at the intersection.</p>					
<p>Impact 3.14-7p: Unacceptable LOS at the Hazel Avenue/U.S. 50 Eastbound Ramps Intersection (Intersection 24) under Cumulative (2030) Conditions.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7p: Participate in Improvements to the Hazel Avenue/U.S. 50 Eastbound Ramps Intersection (Intersection 24). To ensure that the Hazel Avenue/U.S. 50 eastbound ramps intersection operates at an acceptable LOS D, all of the following improvements are required at this interchange:</p> <ul style="list-style-type: none"> ▶ The structure across U.S. 50 must be widened to accommodate eight lanes (four in each direction) on the structure. ▶ The eastbound off-ramp approach must be reconfigured to consist of three left-turn lanes, a shared left/right-turn lane, and one right turn lane. <p>Improvements to this interchange must be coordinated with Caltrans and the County.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvements fall under the jurisdiction of Caltrans and the County, and neither the City nor the project applicant(s) would have control over their timing or implementation.</p>					

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Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-7q: Unacceptable LOS at the Hazel Avenue/U.S. 50 Westbound Ramps Intersection (Intersection 25) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7q: Participate in Improvements to the Hazel Avenue/U.S. 50 Westbound Ramps Intersection (Intersection 25). Substantial improvements must be made to ensure that the Hazel Avenue/U.S. 50 westbound ramps intersection operates at an acceptable LOS D or better. Specifically, the following improvements should be made:</p> <ul style="list-style-type: none"> ▶ The northbound approach should be reconfigured to consist of four through lanes and a free right-turn lane (this would require prohibiting northbound left turns to Tributary Point Drive). ▶ The southbound approach should be reconfigured to consist of five through lanes and a free right-turn lane. ▶ The eastbound approach should be reconfigured to consist of one free right-turn lane. ▶ The westbound approach should be reconfigured to consist of one left-turn lane, two through lanes, and one right-turn lane. <p>However, these improvements would prohibit northbound access to development west of the intersection and may be deemed infeasible in that access must be maintained.</p> <p>Improvements to this intersection must be coordinated with Caltrans and the County.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvements fall under the jurisdiction of Caltrans and the County, and neither the City nor the project applicant(s) would have control over their timing or implementation.</p>					
Impact 3.14-7r: Unacceptable LOS at the Grant Line Road/White Rock Road Intersection (Intersection 26) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7r: Participate in Improvements to the Grant Line Road/White Rock Road Intersection (Intersection 26). To ensure that the Grant Line Road/White Rock Road intersection operates at an acceptable LOS D or better, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ The northbound approach must be reconfigured to consist of three left-turn lanes and three through lanes. ▶ The southbound approach must be reconfigured to consist of two through lanes and two right-turn lanes. ▶ The eastbound approach must be reconfigured to consist of two left-turn lanes and one free (uncontrolled) right-turn lane. <p>Improvements to this intersection must be coordinated with the County.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvements fall under the jurisdiction of the County, and neither the City nor the project applicant(s) would have control over their timing or implementation.</p>					

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-7s: Unacceptable LOS at the Sunrise Boulevard/Kiefer Boulevard Intersection (Intersection 27) under Cumulative (2030) Conditions.	LTS(m)	LTS(m)	LTS(m)	SU	NI
PP, HD, IM: Mitigation Measure 3.14-7s: Participate in Improvements to the Sunrise Boulevard/Kiefer Boulevard Intersection (Intersection 27). To ensure that the Sunrise Boulevard/Kiefer Boulevard intersection operates at an acceptable LOS D or better, the northbound and southbound approaches must be reconfigured to consist of two left-turn lanes, three through lanes, and one right-turn lane.					
Impact 3.14-7t: Unacceptable LOS at the Eagles Nest Road/Kiefer Boulevard Intersection (Intersection 28) under Cumulative (2030) Conditions.	LTS(m)	LTS(m)	LTS(m)	SU	NI
PP, HD, IM: Mitigation Measure 3.14-7t: Participate in Improvements to the Eagles Nest Road/Kiefer Boulevard Intersection (Intersection 28). To ensure that the Eagles Nest Road/Kiefer Boulevard intersection operates at an acceptable LOS D or better, all approaches must be reconfigured to consist of one left-turn lane, two through lanes, and one right-turn lane.					
Impact 3.14-7u: Unacceptable LOS at the Sunrise Boulevard/International Drive Intersection (Intersection 29) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
PP, HD, IM: Mitigation Measure 3.14-7u: Participate in Improvements to the Sunrise Boulevard/International Drive Intersection (Intersection 29). To improve LOS at the Sunrise Boulevard/International Drive intersection, the intersection must be reconfigured to consist of three left-turn lanes, three through lanes, and two right-turn lanes. However, even with these improvements, this intersection would operate at an unacceptable LOS. To further improve operations and to fully reduce the impact, aggressive at-grade improvements (such as implementation of a continuous-flow intersection) or partial grade separation is required, consistent with the City's Circulation Element/Plan and associated CIP. However, the aggressive at-grade treatments have not been designed, and they could have geometric and/or environmental constraints that may make the treatments infeasible. The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the improvements may have as-yet-unknown potentially significant impacts.					
Impact 3.14-7v: Unacceptable LOS at the Rancho Cordova Parkway/White Rock Road Intersection (Intersection 30) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
PP, HD, IM: Mitigation Measure 3.14-7v: Participate in Improvements to the Rancho Cordova Parkway/White Rock Road Intersection (Intersection 30). To improve operations at the Rancho Cordova Parkway/White Rock Road intersection, all the following improvements are required:					
<ul style="list-style-type: none"> ▶ The northbound and southbound approaches must be reconfigured to consist of three left-turn lanes, three through lanes, and one right-turn lane. ▶ The southbound approach must be reconfigured to include a free right-turn lane. ▶ The eastbound and westbound approaches must be reconfigured to consist of three left-turn lanes, four through lanes, and a right-turn lane. 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>However, these improvements are inconsistent with the City’s General Element/Plan. Alternatively, aggressive at-grade improvements (such as implementation of a continuous-flow intersection) or partial grade separation, consistent with the City’s Circulation Element/Plan and associated CIP, could be implemented.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the improvements may have as-yet-unknown potentially significant impacts.</p>					
<p>Impact 3.14-7w: Unacceptable LOS at the Rancho Cordova Parkway/U.S. 50 Eastbound Ramps Intersection (Intersection 31) under Cumulative (2030) Conditions.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7w: Participate in Improvements to the Rancho Cordova Parkway/U.S. 50 Eastbound Ramps Intersection (Intersection 31). To ensure that the Rancho Cordova Parkway/U.S. 50 eastbound ramps intersection operates at an acceptable LOS, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ The northbound approach must be reconfigured to consist of two “free” right-turn lanes and two through lanes. ▶ The southbound approach must be reconfigured to consist of one left-turn lane and two through lanes. ▶ The eastbound approach must be reconfigured to consist of one shared through/left-turn lane and two “free” right-turn lanes. <p>Improvements to this intersection must be coordinated with Caltrans.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvements fall under the jurisdiction of Caltrans, and neither the City nor the project applicant(s) would have control over their timing or implementation.</p>					
<p>Impact 3.14-7x: Unacceptable LOS at the Douglas Road/Jaeger Road Intersection (Intersection 33) under Cumulative (2030) Conditions.</p>	LTS(m)	LTS(m)	LTS(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7x: Participate in Improvements to the Douglas Road/Jaeger Road Intersection (Intersection 33). Improvements must be made to ensure that the Douglas Road/Jaeger Road intersection operates at an acceptable LOS. Specifically, all of the following improvements should be made:</p> <ul style="list-style-type: none"> ▶ The northbound approach should be reconfigured to consist of two left-turn lanes, three through lanes, and a right-turn lane. ▶ The southbound approach should be reconfigured to consist of two left-turn lanes, three through lanes, and a right-turn lane. ▶ The eastbound approach should be reconfigured to consist of two left-turn lanes, three through lanes, and one right-turn lane with right-turn capacity enhancement (such as a pork-chop island or right-turn green arrow concurrent with the southbound left-turn phase). ▶ The westbound approach should be reconfigured to consist of two left-turn lanes, three through lanes, and one right-turn lane. 					

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-7y: Unacceptable LOS at the Douglas Road/Americanos Boulevard Intersection (Intersection 34) under Cumulative (2030) Conditions.	LTS(m)	LTS(m)	LTS(m)	SU	NI
PP, HD, IM: Mitigation Measure 3.14-7y: Participate in Improvements to the Douglas Road/Americanos Boulevard Intersection (Intersection 34). To ensure that the Douglas Road/Americanos Boulevard intersection operates at an acceptable LOS D or better, a second eastbound right-turn lane must be added.					
Impact 3.14-7z: Unacceptable LOS at the Chrysanthy Boulevard/Sunrise Boulevard Intersection (Intersection 35) under Cumulative (2030) Conditions.	LTS(m)	LTS(m)	LTS(m)	SU	NI
PP, HD, IM: Mitigation Measure 3.14-7z: Participate in Improvements to the Chrysanthy Boulevard/Sunrise Boulevard Intersection (Intersection 35). To ensure that the Chrysanthy Boulevard/Sunrise Boulevard intersection operates at an acceptable LOS, a second westbound right-turn lane must be added.					
Impact 3.14-7aa: Unacceptable LOS at the White Rock Road/Americanos Boulevard Intersection (Intersection 39) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
PP, HD, IM: Mitigation Measure 3.14-7aa: Participate in Improvements to the White Rock Road/Americanos Boulevard Intersection (Intersection 39). To ensure that the White Rock Road/Americanos Boulevard intersection operates at an acceptable LOS during the a.m. peak traffic hour, the northbound and southbound approaches must be reconfigured to consist of three left-turn lanes, two through lanes, and a shared through/right-turn lane; and the eastbound and westbound approaches must be reconfigured to consist of one left-turn lane, three through lanes, and two right-turn lanes. Improvements to this intersection must be coordinated with the County and Aerojet General Corporation (Aerojet). The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the future north-south connectivity improvement fall under the jurisdiction of the County and may be precluded by operations at Aerojet, and neither the City nor the project applicant(s) would have control over the timing or implementation.					
Impact 3.14-7bb: Unacceptable LOS at the Hazel Avenue/Gold Country Boulevard Intersection (Intersection 40) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
PP, HD, IM: Mitigation Measure 3.14-7bb: Participate in Improvements to the Hazel Avenue/Gold Country Boulevard Intersection (Intersection 40). To ensure that the Hazel Avenue/Gold Country Boulevard intersection operates at an acceptable LOS, the northbound and southbound approaches must be reconfigured to consist of additional through lanes in the northbound and southbound directions. However, there are significant geographic constraints associated with additional widening of Hazel Avenue, primarily because of the existing bridge crossing of the American River just north of this intersection. Additionally, any roadway widening would require modification to the bluffs between the American River and Fair Oaks Boulevard. Improvements to this intersection must be coordinated with the County. The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvements fall under the jurisdiction of the County, and neither the City nor the project applicant(s) would have control over the timing or implementation.					

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.14-7cc: Unacceptable LOS on International Drive between South White Rock Road and Zinfandel Drive (Roadway Segment 6) under Cumulative (2030) Conditions.</p> <p>PP, HD, IM: Mitigation Measure 3.14-7cc: Participate in Improvements to International Drive between South White Rock Road and Zinfandel Drive (Roadway Segment 6). Improvements must be made to ensure that International Drive operates at an acceptable LOS between South White Rock Road and Zinfandel Drive; specifically, this roadway segment should be widened to eight lanes. However, the identified improvement is inconsistent with the City's Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes.</p> <p>An alternative to this improvement is additional connectivity, such as completion of the Kiefer Boulevard extension into Sacramento. This alternative improvement could relieve some traffic from this roadway segment, but would not reduce the impact to a less-than-significant level.</p> <p>Improvements to this roadway segment must be coordinated with the County.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvements would fall under the jurisdiction of the County, and neither the City nor the project applicant(s) would have control over the timing or implementation.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>Impact 3.14-7dd: Unacceptable LOS on Mather Field Road between Folsom Boulevard and U.S. 50 Westbound Ramps (Roadway Segment 12) under Cumulative (2030) Conditions.</p> <p>PP, HD, IM: Mitigation Measure 3.14-7dd: Participate in Improvements to Mather Field Road between Folsom Boulevard and U.S. 50 Westbound Ramps (Roadway Segment 12). Improvements must be made to ensure that Mather Field Road operates at an acceptable LOS between Folsom Boulevard and U.S. 50 westbound ramps; specifically, this roadway segment should have high-access controls.</p>	LTS(m)	LTS(m)	LTS(m)	SU	NI
<p>Impact 3.14-7ee: Unacceptable LOS on Zinfandel Drive between the U.S. 50 Eastbound Ramps and White Rock Road (Roadway Segment 15) under Cumulative (2030) Conditions.</p> <p>PP, HD, IM: Mitigation Measure 3.14-7ee: Participate in Improvements to Zinfandel Drive between the U.S. 50 Eastbound Ramps and White Rock Road (Roadway Segment 15). Improvements must be made to ensure that Zinfandel Drive operates at an acceptable LOS between the U.S. 50 eastbound ramps and White Rock Road; specifically, this roadway segment should be widened to eight lanes. However, this identified improvement is inconsistent with the City's Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes.</p> <p>An alternative to this improvement is additional connectivity, such as the completion of Kiefer Boulevard into Sacramento and the extension of Routier Road. This alternative improvement could relieve some traffic from this roadway segment, but would not reduce the impact to a less-than-significant level.</p> <p>Improvements to this roadway segment must be coordinated with the County.</p>	SU(m)	SU(m)	SU(m)	SU	NI

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvements fall under the jurisdiction of the County, neither the City nor the project applicant(s) would have control over the timing or implementation of the improvements.					
Impact 3.14-7ff: Unacceptable LOS on Sunrise Boulevard between Gold Country Boulevard and Coloma Road (Roadway Segment 17) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7ff: Participate in Improvements to Sunrise Boulevard between Gold Country Boulevard and Coloma Road (Roadway Segment 17). Improvements must be made to improve operation on Sunrise Boulevard between Gold Country Boulevard and Coloma Road; specifically, this roadway segment should be widened to eight lanes. The identified improvement would more than offset the impacts specifically related to the Rio del Oro project on the roadway segment. However, because of other development in the region that would substantially increase traffic levels, the roadway segment would continue to operate at an unacceptable LOS even with the capacity improvements identified to mitigate Rio del Oro impacts. The identified improvement is consistent with the County Mobility Study; however, it is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes. Moreover, without additional river crossings, there are no parallel capacity improvements to relieve Sunrise Boulevard on this segment. Additional river crossings would result in significant environmental effects (i.e., loss of riparian habitat and loss of structures).</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvement is inconsistent with the City’s Circulation Element/Plan and therefore may not be implemented, and because the potential for additional river crossings is limited and would require coordination and approval by other regulatory agencies, neither the City nor the project applicant(s) would have control over the time or implementation.</p>					
Impact 3.14-7gg: Unacceptable LOS on Sunrise Boulevard between Coloma Road and the U.S. 50 Westbound Ramps (Roadway Segment 18) under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
<p>PP, HD, IM: Mitigation Measure 3.14-7gg: Participate in Improvements to Sunrise Boulevard between Coloma Road and the U.S. 50 Westbound Ramps (Roadway Segment 18). Improvements must be made to improve operation on Sunrise Boulevard between Coloma Road and the U.S. 50 westbound ramps; specifically, this roadway segment should be widened to eight lanes. The identified improvement would more than offset the impacts specifically related to the Rio del Oro project on this roadway segment. However, because of other development in the region that would substantially increase traffic levels, this roadway segment would continue to operate at an unacceptable LOS even with the capacity improvements identified to mitigate Rio del Oro impacts. The identified improvement is consistent with the County Mobility Study; however, it is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes. Moreover, without additional river crossings, there are no parallel capacity improvements to relieve Sunrise Boulevard on this segment.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvement (widening of Sunrise Boulevard) is inconsistent with the City’s Circulation Element/Plan and therefore may not be implemented, and because the potential for additional river crossings is limited and would require coordination and approval by other regulatory agencies.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.14-7hh: Unacceptable LOS on Sunrise Boulevard between the U.S. 50 Eastbound Ramps and Folsom Boulevard (Roadway Segment 19) under Cumulative (2030) Conditions.</p> <p>PP, HD, IM: Mitigation Measure 3.14-7hh: Participate in Improvements to Sunrise Boulevard between the U.S. 50 Eastbound Ramps and Folsom Boulevard (Roadway Segment 19). Improvements must be made to ensure that Sunrise Boulevard operates at an acceptable LOS between the U.S. 50 eastbound ramps and Folsom Boulevard; specifically, this roadway segment should be widened to eight lanes. With implementation of this identified improvement, this segment would operate at an acceptable LOS, and the improvement is consistent with the County Mobility Study; however, it is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvement (widening of Sunrise Boulevard) is inconsistent with the City’s Circulation Element/Plan and therefore may not be implemented.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>Impact 3.14-7ii: Unacceptable LOS on Sunrise Boulevard between Folsom Boulevard and White Rock Road (Roadway Segment 20) under Cumulative (2030) Conditions.</p> <p>PP, HD, IM: Mitigation Measure 3.14-7ii: Participate in Improvements to Sunrise Boulevard between Folsom Boulevard and White Rock Road (Roadway Segment 20). Improvements must be made to ensure that Sunrise Boulevard operates at an acceptable LOS between Folsom Boulevard and White Rock Road; specifically, this roadway segment should be widened to eight lanes. With implementation of this identified improvement, this segment would operate at an acceptable LOS, but the improvement is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes.</p> <p>Because the identified improvement (widening of Sunrise Boulevard) is inconsistent with the City’s Circulation Element/Plan and therefore may not be implemented, the impact conclusion reached in this DEIR/DEIS is significant and unavoidable.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>Impact 3.14-7jj: Unacceptable LOS on Hazel Avenue between Winding Way and the U.S. 50 Westbound Ramps (Roadway Segment 23) under Cumulative (2030) Conditions.</p> <p>PP, HD, IM: Mitigation Measure 3.14-7jj: Participate in Improvements to Hazel Avenue between Winding Way and the U.S. 50 Westbound Ramps (Roadway Segment 23). To improve operation on Hazel Avenue between Winding Way and the U.S. 50 westbound ramps, this roadway segment must be widened to eight lanes. Improvements to this roadway segment must be coordinated with the County.</p> <p>The identified improvement would more than offset the impacts specifically related to the Rio del Oro project on this roadway segment. However, because of other development in the region that would substantially increase traffic levels, this roadway segment would continue to operate at an unacceptable LOS even with the capacity improvements identified to mitigate Rio del Oro impacts.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvement would fall under the jurisdiction of the County, and neither the City nor the project applicant(s) would have control over the time or implementation</p>	SU(m)	SU(m)	SU(m)	SU	NI

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.14-7kk: Unacceptable LOS on U.S. 50 between Mather Field Road and Zinfandel Drive (Freeway Segment 27); between Sunrise Boulevard and Rancho Cordova Parkway (Freeway Segment 29); between Rancho Cordova Parkway and Hazel Avenue (Freeway Segment 30); and between Hazel Avenue and Folsom Boulevard (Freeway Segment 31) under Cumulative (2030) Conditions.</p> <p>PP, HD, IM: Mitigation Measure 3.14-7kk: Participate in Improvements to U.S. 50 between Mather Field Road and Zinfandel Drive (Freeway Segment 27); between Sunrise Boulevard and Rancho Cordova Parkway (Freeway Segment 29); between Rancho Cordova Parkway and Hazel Avenue (Freeway Segment 30); and between Hazel Avenue and Folsom Boulevard (Freeway Segment 31). To ensure that these freeway segments operate at an acceptable LOS, all of the following improvements are required:</p> <ul style="list-style-type: none"> ▶ Ramp metering must be implemented on the Mather Field Road and Zinfandel Drive eastbound on-ramps. ▶ Auxiliary lanes must be constructed from Mather Field Road, Sunrise Boulevard, and Rancho Cordova Parkway. ▶ Traffic-signal timing at freeway interchanges must be coordinated with adjacent City intersections to minimize impacts of vehicle queue spillback onto U.S. 50. ▶ Parallel facilities to U.S. 50 must be constructed, including improvements to SR 16, extension of International Drive into and through the project site, extension of Kiefer Boulevard, construction of Easton Valley Parkway, and connectivity of International Drive to Old Placerville Road. ▶ HOV lanes must be extended from Sunrise Boulevard to downtown Sacramento (or, as an interim project, to Watt Avenue). ▶ HOV enhancements to existing interchanges must be provided, such as bypass lanes at existing metered on-ramps. <p>Improvements to these freeway segments must be coordinated with Caltrans.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvement falls under the jurisdiction of Caltrans, and neither the City nor the project applicant(s) would have control over the time or implementation</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>Impact 3.14-7ll: Unacceptable LOS on Sunrise Boulevard between Douglas Road and Chrysanthy Boulevard (Roadway Segment 43) under Cumulative (2030) Conditions.</p> <p>PP, HD, IM: Mitigation Measure 3.14-7ll: Participate in Improvements to Sunrise Boulevard between Douglas Road and Chrysanthy Boulevard (Roadway Segment 43). Improvements must be made to ensure that Sunrise Boulevard operates at an acceptable LOS D or better between Douglas Road and Chrysanthy Boulevard; specifically, this roadway segment should be widened to eight lanes. With implementation of this improvement, this segment would operate at an acceptable LOS; however, the improvement is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes or fewer.</p> <p>An alternative to this improvement is additional connectivity, such as the extensions of Chrysanthy Boulevard to Kiefer Boulevard, Jaeger Road to Grant Line Road, and Kiefer Boulevard to Sacramento. This alternative improvement has the potential to relieve traffic from this roadway segment and reduce the impact to a less-</p>	SU(m)	SU(m)	SU(m)	SU	NI

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Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>than-significant level.</p> <p>Improvements to this roadway segment must be coordinated with the County.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvement (widening of Sunrise Boulevard) is inconsistent with the City’s Circulation Element/Plan and therefore may not be implemented. Furthermore, the necessary alternative addition of roadway connectivity falls under the jurisdiction of the County; neither the City nor the project applicant(s) would have control over the timing or implementation</p>					
<p>Impact 3.14-7mm: Unacceptable LOS on Rancho Cordova Parkway between Easton Valley Parkway and White Rock Road (Roadway Segment 47) under Cumulative (2030) Conditions.</p> <p>PP, HD, IM: Mitigation Measure 3.14-7mm: Participate in Improvements to Rancho Cordova Parkway between Easton Valley Parkway and White Rock Road (Roadway Segment 47). To improve operation on Rancho Cordova Parkway between Easton Valley Parkway and White Rock Road, this roadway segment must be widened to eight lanes. The identified improvement would more than offset the impacts specifically related to the Rio del Oro project on this roadway segment. However, because of other development in the region that would substantially increase traffic levels, this roadway segment would continue to operate at an unacceptable LOS even with the capacity improvements identified to mitigate Rio del Oro impacts. Furthermore, this improvement is inconsistent with the City’s Circulation Element/Plan because City policy requires a maximum roadway cross section of six lanes or fewer.</p> <p>An alternative to this improvement is additional connectivity, such as the extension of Chrysanthy Boulevard to Kiefer Boulevard, the extension of Jaeger Road to Grant Line Road, the extension of Kiefer Boulevard to Sacramento, and additional connectivity through the Aerojet site. This alternative improvement has the potential to relieve traffic from this roadway segment, but would not reduce the impact to a less-than-significant level.</p> <p>Improvements to this roadway segment must be coordinated with the County and Aerojet.</p> <p>The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because the identified improvement (widening Rancho Cordova Parkway) is inconsistent with the City’s Circulation Element/Plan and therefore may not be implemented. Furthermore, the alternative roadway connectivity would not reduce the project impact to a less-than-significant level. Additionally, the alternative addition of roadway connectivity falls under the jurisdiction of the County and Aerojet; neither the City nor the project applicant(s) would have control over the timing or implementation.</p>	SU(m)	SU(m)	SU(m)	SU	NI
<p>Impact 3.14-7nn: Unacceptable LOS on Rancho Cordova Parkway between White Rock Road and Douglas Road (Roadway Segment 48) under Cumulative (2030) Conditions.</p> <p>HD, IM: Mitigation Measure 3.14-7nn: Participate in Improvements to Rancho Cordova Parkway between White Rock Road and Douglas Road (Roadway Segment 48). To ensure that Rancho Cordova Parkway operates at an acceptable LOS D or better between White Rock Road and Douglas Road, high-access control must be implemented on this roadway segment.</p>	LTS(m)	LTS(m)	LTS(m)	SU	NI

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Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.14-7oo: Unacceptable LOS on Americanos Boulevard between White Rock Road and Douglas Road (Roadway Segment 50) under Cumulative (2030) Conditions.	LTS(m)	LTS(m)	LTS(m)	SU	NI
HD: Mitigation Measure 3.14-7oo: Participate in Improvements to Americanos Boulevard between White Rock Road and Douglas Road (Roadway Segment 50). To ensure that Americanos Boulevard operates at an acceptable LOS D or better between White Rock Road and Douglas Road, this roadway segment must have high-access control.					
Impact 3.14-7pp: Unacceptable LOS at Various Merge, Diverge, and Weave Segments of U.S. 50 under Cumulative (2030) Conditions.	SU(m)	SU(m)	SU(m)	SU	NI
PP, HD, IM: Mitigation Measure 3.14-7pp: Participate in Improvements to U.S. 50 Merge, Diverge, and Weave Segments. To ensure that the U.S. 50 merge, diverge, or weave areas operate at an acceptable LOS, the following improvements to the U.S. 50 corridor are required:					
<ul style="list-style-type: none"> ▶ Ramp metering must be added on the Mather Field Road and Zinfandel Drive eastbound on-ramps. ▶ An auxiliary lane must be constructed from Mather Field Road and Sunrise Boulevard. ▶ Traffic-signal timing at freeway interchanges must be coordinated with adjacent City intersections to minimize impacts of vehicle queue spillback onto U.S. 50. ▶ Parallel facilities to U.S. 50 must be constructed, including improvements to SR 16, extension of International Drive into and through the project site, extension of Kiefer Boulevard, construction of Easton Valley Parkway, and connectivity of International Drive to Old Placerville Road. ▶ HOV lanes must be extended from Sunrise Boulevard to downtown Sacramento (or, in an interim project, to Watt Avenue). ▶ HOV enhancements to existing interchanges must be provided, such as bypass lanes at existing metered on-ramps. 					
Improvements to these merge, diverge, and weave areas must be coordinated with Caltrans and the County.					
The impact conclusion reached in this DEIR/DEIS is significant and unavoidable because several of the identified improvements fall under the jurisdiction of Caltrans and the County; and neither City nor the project applicant(s) would have control over the timing or implementation.					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.15 AIR QUALITY					
Program Level and Project Level (Phase 1)					
Impact 3.15-1: Generation of Temporary, Short-Term Construction Emissions of ROG, NO_x, and PM₁₀	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.15-1: Implement Measures to Control Construction-Generated Air Pollutant Emissions. To reduce short-term construction emissions, the project applicant(s) for all project phases shall implement the measures described below. In addition to the measures identified below, construction operations shall comply with all applicable SMAQMD rules and regulations.</p> <ul style="list-style-type: none"> ▶ Phase 1 of all action alternatives for Rio del Oro would result in construction-generated emissions that exceed the SMAQMD threshold of significance, even after implementation of the SMAQMD “standard construction mitigation.” Therefore, the project applicant(s) shall pay SMAQMD an off-site mitigation fee for implementation of any of these alternatives for the purpose of reducing impacts to a less-than-significant level. The specific fee amounts shall be calculated when the construction emissions can be more accurately determined. This calculation would occur when an alternative has been selected, the project has been approved, and the Phase 1 improvement plans have been prepared. Calculation of fees associated with future, subsequent project phases shall be conducted before the approval of grading plans. It is estimated, based on information available at this time, that the off-site construction mitigation fees would range from \$4,404,845 to \$5,461,587 for development Phase 1, depending on which alternative is selected. ▶ The project applicant(s) for all project phases shall pay into SMAQMD’s off-site construction mitigation fund to further mitigate construction-generated emissions of NO_x that exceed SMAQMD’s daily emission threshold of 85 lb/day. The calculation of daily NO_x emissions is based on the current 2006 cost of \$14,300 to reduce 1 ton of NO_x. <u>The final mitigation fee shall be calculated using the current SMAQMD off-site construction mitigation fee calculation methodology available and fee rate established by SMAQMD at the time of the approval of each project phase.</u> The determination of the final mitigation fee shall be conducted in coordination with SMAQMD before any demolition or ground disturbance occurs for any project phase. ▶ Calculation of and payment of the fee for development Phase 1 and all subsequent project phases shall also be included in the Mitigation Monitoring and Reporting Program (MMRP) for the project. ▶ The project applicant(s) for all project phases shall reduce NO_x and visible emissions from heavy-duty diesel equipment by implementing the following measures: <ul style="list-style-type: none"> • A plan shall be developed for approval by the City, in consultation with SMAQMD, demonstrating that the heavy-duty (>50 hp), off-road vehicles to be used in the construction project (including owned, leased, and subcontractor vehicles) will achieve a projectwide fleet-average 20% NOX reduction and 45% particulate reduction compared to the most recent ARB fleet average at the time of construction. Acceptable options for reducing emissions include the use of late-model engines, low-emission diesel products, alternative fuels, particulate-matter traps, engine retrofit technology, after-treatment products, and/or such other options as become available. 					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> • A comprehensive inventory of all off-road construction equipment equal to or greater than 50 hp that shall be used for an aggregate of 40 or more hours during any portion of project construction shall be submitted to the City and SMAQMD. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction operations occur. At least 48 hours before heavy-duty off-road equipment is used, the project applicant(s) shall provide SMAQMD with the anticipated construction timeline, including the start date, and the name and phone number of the project manager and on-site foreman. • Emissions from off-road, diesel-powered equipment used on the project site shall not exceed 40% opacity for more than 3 minutes in any 1 hour. Any equipment found to exceed 40% opacity (or Ringlemann 2.0) shall be repaired immediately, and SMAQMD shall be notified of noncompliant equipment within 48 hours of identification. A visual survey of all in-operation equipment shall be made at least weekly. A monthly summary of visual survey results shall be submitted to SMAQMD throughout the duration of the construction project, except that the monthly summary shall not be required for any 30-day period in which no construction operations occur. The monthly summary shall include the quantity and type of vehicles surveyed, as well as the dates of each survey. SMAQMD and/or other officials may conduct periodic site inspections to determine compliance. • Emulsified diesel or diesel catalysts shall be used on applicable heavy-duty construction equipment. • All of the above measures shall be included in all construction plans and specifications. • Payment into SMAQMD’s construction mitigation fund to offset construction-generated emissions of NO_x that exceed SMAQMD’s daily emission threshold of 85 lb/day shall be made. The calculation of daily NO_x emissions, for determination of offset fee mitigation, shall be conducted in coordination with SMAQMD and shall be based on the construction plan and equipment inventory to be prepared by the project representative. ▶ As recommended by SMAQMD, the project applicant(s) for all project phases shall reduce fugitive-dust emissions by implementing the following measures: <ul style="list-style-type: none"> • Dust emissions on all disturbed areas, including storage piles that are not being actively used for construction purposes, shall be effectively stabilized using water, a chemical stabilizer or suppressant, or vegetative ground cover (keeping soil moist at all times). • Dust emissions on all on- and off-site unpaved access roads shall be effectively stabilized using water or a chemical stabilizer or suppressant. • When materials are transported off-site, such materials shall be covered and effectively wetted to limit visible dust emissions, and at least 2 feet of freeboard space shall be maintained from the top of the container. • The accumulation of project-generated mud or dirt from adjacent public streets shall be limited or expeditiously removed at least once every 24 hours when operations are occurring. After materials are added to or removed from the surfaces of outdoor storage piles that have the potential for fugitive-dust emissions, such storage piles shall be effectively stabilized using sufficient water or a chemical stabilizer or suppressant. • On-site vehicle speeds on unpaved roads shall be limited to 15 mph. • Wheel washers shall be installed for all trucks and equipment exiting unpaved areas, or wheels shall be washed to remove accumulated dirt before such vehicles leave the site. • Sandbags or other erosion control measures shall be installed to prevent runoff of silt to public roadways from adjacent project areas with a slope greater than 1%. 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> Excavation and grading activities, except soil stabilization activities, shall be suspended when winds exceed 20 mph. The extent of areas simultaneously subject to excavation and grading shall be limited to the minimum area feasible. <p>Timing: Before the approval of all grading plans and throughout project construction for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works and Planning Departments and Sacramento Metropolitan Air Quality Management District.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.15-2: Generation of Long-Term Operational (Regional) Emissions of ROG, NO_x, and PM₁₀</p> <p style="text-align: center;">Direct & SU(m), No Indirect Direct & SU(m), No Indirect Direct & SU(m), No Indirect Direct & SU(m), No Indirect No Direct, No Indirect</p> <p>PP, HD, IM, NF: Mitigation Measure 3.15-2a: Implement Measures to Control Long-Term Operational (Regional) Emissions of ROG, NO_x, and PM₁₀. The project applicant(s) for all project phases shall submit a copy of the Operational Air Quality Plan developed in consultation with and approved by SMAQMD to the City. The Operational Air Quality Plan shall include measures to reduce operational air quality impacts associated with the project by a minimum of 15%, and these measures shall be included in the Rio del Oro Specific Plan. The project applicant(s) shall implement all measures included in the Operational Air Quality Plan. (The Operational Air Quality Plan is included in Appendix L of this DEIR/DEIS.)</p> <p>Timing: Before the approval of grading plans and throughout project construction, as appropriate for all project phases.</p> <p>Enforcement: City of Rancho Cordova Public Works, Building and Safety, and Planning Departments and Sacramento Metropolitan Air Quality Management District.</p> <p>NP: No mitigation measures are required.</p> <p>Mitigation Measure 3.15-2b: Locate Electrical Outlets to Support Use of Electrical Landscaping Equipment. The project applicant(s) for all project phases shall promote a reduction in residential emissions by encouraging the installation of conveniently located electrical outlets within the front, side, and rear yards of all residential structures, as appropriate, to support the use of electrical landscaping equipment.</p> <p>Timing: Throughout project construction of all residential phases.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.15-3: Generation of Local Mobile-Source CO Emissions</p> <p style="text-align: center;">Direct & LTS, No Indirect Direct & LTS, No Indirect Direct & LTS, No Indirect Direct & LTS, No Indirect No Direct, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.15-4: Exposure of Sensitive Receptors to Short- and Long-Term Emissions of Toxic Air Contaminants	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.15-4: Develop a Plan to Reduce Emissions and Implement Measures to Control Exposure of Sensitive Receptors to Toxic Air Emissions. The project applicant(s) for all project phases shall develop a plan to reduce the exposure of sensitive receptors to TACs from project construction and operation. The plan shall be submitted to the City for review and approval before the approval of any grading plans.</p> <p>With respect to project construction, the plan may include such measures as scheduling activities when the residences are the least likely to be occupied, requiring equipment to be shut off when not in use, and prohibiting heavy trucks from idling. Applicable measures shall be included in all project plans and specifications for all project phases.</p> <p>With respect to project operation for all project phases, the plan may include such measures as the following:</p> <ul style="list-style-type: none"> ▶ Before the issuance of any certificates of occupancy or final inspections for on-site sensitive land uses (e.g., residences, schools) in close proximity to mining operations (i.e., within 1,000 feet), the City shall ensure that associated mining activities have concluded. ▶ Proposed commercial/convenience land uses (e.g., loading docks) that have the potential to emit TACs shall be located as far away as possible from existing and proposed sensitive receptors (i.e., 1,000 feet). ▶ When determining the exact type of facility that would occupy the proposed commercial/convenience space, the project shall take into consideration the facility's TAC-producing potential. <p>The following additional guidelines are recommended in ARB's <i>Air Quality and Land Use Handbook: A Community Health Perspective</i> (California Air Resources Board 2005a) and are considered to be advisory and not regulatory:</p> <ul style="list-style-type: none"> ▶ Sensitive receptors, such as residential units and daycare centers, shall not be located in the same building as dry-cleaning operations that use perchloroethylene. Dry-cleaning operations that use perchloroethylene shall not be located within 300 feet of any sensitive receptor. A setback of 500 feet shall be provided for operations with two or more machines. Large gasoline stations (defined as facilities with a throughput of 3.6 million gallons per year or greater) and sensitive land uses shall not be sited within 300 feet of each other. Small gasoline-dispensing facilities (less than 3.6 million gallons of throughput per year) and sensitive land uses shall not be sited within 50 feet of each other. <p>Timing: Before the approval of all grading plans and throughout project construction, where applicable for all project phases.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.15-5: Possible Exposure of Sensitive Receptors to Odorous Emissions	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.15-5: Implement Measures to Control Exposure of Sensitive Receptors to Odorous Emissions. The project applicant(s) for all project phases shall implement the following measures:</p> <ul style="list-style-type: none"> ▶ Commercial/convenience land uses that have the potential to emit objectionable odors shall be located as far away as feasible from existing and proposed sensitive receptors. ▶ Delivery areas shall be located as far away as feasible from existing and proposed sensitive receptors. ▶ The odor-producing potential of land uses shall be considered when the exact type of facility that would occupy commercial/convenience areas is determined. ▶ Before the approval of building permits, odor control devices shall be identified to mitigate the exposure of receptors to objectionable odors if a potentially odor-producing source is to occupy space in the commercial/convenience area. The identified odor control devices shall be installed before the issuance of certificates of occupancy for the potentially odor-producing use. The odor-producing potential of a source and control devices shall be determined in coordination with SMAQMD and based on the number of complaints associated with existing sources of the same nature. <p>Timing: Before the approval of building permits and certificates of occupancy for commercial uses for all project phases.</p> <p>Enforcement: City of Rancho Cordova Building and Safety and Planning Departments.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.15-6: Possible Exposure to Hazardous Indoor Emissions of Air Pollutants	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.15-7: Increase in Long-Term Atmospheric Greenhouse Gas Emissions	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.15-7a: Implement Mitigation Measures 3.15-2a and 3.15-2b.</p> <p>NP: No mitigation measures are required.</p> <p>Mitigation Measure 3.15-7b: Incorporate Green Building Measures into Residential Construction. The project applicant(s) for all residential phases shall participate in the GreenPoint Rated program. Each home shall be built to achieve the GreenPoint Rated label by earning a minimum of 50 total points and meeting</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>the minimum point thresholds in specific categories: Energy (30), Indoor Air Quality/Health (5), Resources (6), and Water (9). The measures to achieve these points are outlined in the New Home Construction Green Building Guidelines (Build It Green 2007) and grouped into sections corresponding to the various stages of construction. The measures incorporated into the project to achieve the GreenPoint Rated label may include but are not limited to the following:</p> <ul style="list-style-type: none"> ▶ Site: Manage the construction process to minimize disruptions to the building site, reduce waste, and prevent pollution of air, soil, and waterways. ▶ Foundation: Incorporate recycled fly ash in concrete, using frost-protected shallow foundations in cold climates, and installing radon-mitigation measures where appropriate. ▶ Landscaping: Utilize strategies to keep pollutants out of waterways, reduce water use, promote healthy soils, create fire-safe landscaping, and reduce excessive outdoor lighting. ▶ Structural Frame and Envelope: Implement measures to address the building’s structural frame, including the walls, floors, and roof, for more durable buildings that use energy and other resources more efficiently. ▶ Exterior Finish: Install siding, roofing, and decking materials that will hold up well for decades and help protect the home from moisture damage, fire, and general wear and tear. ▶ Insulation: Follow proper insulation installation techniques, and use insulation products with recycled content and low or no formaldehyde emissions. ▶ Plumbing: Design the plumbing system to reduce hot-water runs, insulate hot-water pipes, and install water-efficient toilets. ▶ Heating, Ventilation, and Air Conditioning: Utilize high-efficiency heating and cooling equipment and effective ductwork and ventilation for better indoor air quality. ▶ Renewable Energy: Pre-plumb or install solar hot water systems and pre-wire or install photovoltaic systems. ▶ Building Performance: Design and build high-performance homes that meet or exceed the state’s building energy efficiency standards by including improved insulation, installation of energy efficient windows, installation of tankless hot-water heaters, and other measures. ▶ Finishes: Utilize healthier options for paints, trim, cabinets, and countertops that perform well and are readily available and promote environmentally preferable materials for interior finishes. ▶ Flooring: Utilize finish flooring materials that are attractive, long-lasting, and environmentally friendly. ▶ Appliances: Install high-efficiency residential appliances that can significantly cut a home’s energy and water use, including dishwashers, clothes washers, and refrigerators that exceed minimum Federal efficiency standards. ▶ Other: Utilize innovative approaches to green building that go beyond the basic measures described in these guidelines. <p>Timing: Throughout project construction of all residential phases.</p> <p>Enforcement: City of Rancho Cordova Building and Safety and Planning Departments.</p>					

**Table 1-1
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>NP: No mitigation measures are required.</p> <p>Mitigation Measure 3.15-7c: Incorporate Green Building and Development Measures. Each increment of new development within the project site requiring a discretionary approval (e.g., proposed tentative subdivision map, conditional use permit), shall be subject to a requirement, the details of which shall be established through project-specific environmental review, that GHG emissions from construction and operation of the increment of development at issue will be reduced by 30% from business-as-usual 2006 emissions. In determining 2006 business-as-usual emissions, the assumptions and analysis regarding traffic and operational conditions of the project used in the EIR/EIS may be utilized.</p> <p>For each increment of new development, the developer shall submit to the City, prior to the release of any project-specific environmental document, a proposed mitigation plan that lists the measures selected to be implemented as part of the proposed development increment and/or consideration of previously implemented measures in the specific plan area, including analysis demonstrating the associated reduction in GHG emissions. The list shall reflect the then-current state of the regulation of GHG emissions and climate change, which is expected to continue to evolve under the mandate of AB 32. The mitigation plan shall be accompanied by an analysis demonstrating why, in the developer’s view, the selected measures are both feasible and efficacious. The City, in consultation with the SMAQMD, shall review the mitigation report for the applicable increment of development and shall include the proposed mitigation strategy and accompanying analysis, with any changes considered by City staff to be necessary and potentially feasible, as part of the project-specific environmental review for the proposed increment of new development. After receiving and considering any public input on the proposed mitigation strategy, the City shall ultimately approve the strategy (with modifications, if considered necessary and feasible) prior to granting any requested discretionary approval for that increment of development. In determining what sort of measures should appropriately be imposed by a local government under the circumstances to attain the overall, project-wide 30% emissions requirement, the City shall consider the following factors:</p> <ul style="list-style-type: none"> ▶ <u>The extent to which rates of GHG emissions generated by motor vehicles traveling to, from, and within the project site are projected to decrease over time as a result of regulations, policies, and/or plans that have already been adopted or may be adopted in the future by ARB or other public agency pursuant to AB 32, or by EPA;</u> ▶ <u>The extent to which mobile-source GHG emissions, which at the time of writing this EIR comprise a substantial portion of the state’s GHG inventory, can also be reduced through design measures that result in trip reductions and reductions in trip length;</u> ▶ <u>The extent to which GHG emissions emitted by the mix of power generation operated by SMUD, that will serve the project site, are projected to decrease pursuant to the Renewable Portfolio Standard required by SB 1078 and SB 107, as well as any future regulations, policies, and/or plans adopted by the federal and state governments that reduce GHG emissions from power generation;</u> ▶ <u>The extent to which replacement of CCR Title 24 with the California Green Building Standards Code or other similar requirements will result in new buildings being more energy efficient and consequently more GHG efficient;</u> ▶ <u>The extent to which any stationary sources of GHG emissions that would be operated on a proposed land use (e.g., industrial) are already subject to regulations, policies, and/or plans that reduce GHG emissions, particularly any future regulations that will be developed as part of ARB’s implementation of AB 32, or other pertinent regulations on stationary sources that have the indirect effect of reducing GHG emissions;</u> ▶ <u>The extent to which the feasibility of existing GHG reduction technologies may change in the future, and to which innovation in GHG reduction technologies</u> 					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p><u>will continue, affecting cost-benefit analyses that determine economic feasibility; and</u></p> <ul style="list-style-type: none"> ▶ <u>Whether the total costs of proposed mitigation for GHG emissions, together with other mitigation measures, required for the proposed development, are so great that a reasonably prudent property owner would not proceed with the project in the face of such costs.</u> <p><u>In considering how much, and what kind of, mitigation is necessary in light of these factors, the City shall consider the following list of options, though the list is not intended to be exhaustive, as GHG reduction strategies and their respective feasibility are likely to evolve over time. These measures are derived from multiple sources including the Mitigation Measure Summary in Appendix B of the California Air Pollution Control Officer’s Association (CAPCOA) white paper, CEQA & Climate Change (CAPCOA 2008), the California Attorney General’s Office (2008) and the Sacramento Metropolitan Air District Draft GHG Measures (2009).</u></p> <p><u>Energy Efficiency</u></p> <ul style="list-style-type: none"> ▶ <u>Include clean alternative energy features to promote energy self-sufficiency (e.g., photovoltaic cells, solar thermal electricity systems).</u> ▶ <u>Site buildings to take advantage of shade and prevailing winds and design landscaping and sun screens to reduce energy use.</u> ▶ <u>Install efficient lighting in all buildings (including residential). Also install lighting control systems, where practical. Use daylight as an integral part of lighting systems in all buildings.</u> ▶ <u>Install Energy Star compliant highly reflective roofing materials.</u> ▶ <u>Install light-colored “cool” pavements, and strategically located shade trees along all bicycle and pedestrian routes.</u> <p><u>Project developers should be encouraged to incorporate “green building” points into the construction and design of all projects (including additions of 25,000 square feet of office/retail commercial or 100,000 square feet of industrial floor area) for which “green building” points are available. Such points may be achieved through conformity with the checklists identified by New Home Construction Green Building Guidelines available at www.builditgreen.org (which were developed to apply to residential construction, but which include measures that are also pertinent to commercial construction), or through any similar list that distinguishes specific measures targeting efficiencies in energy, resource use, or other measures that would also directly or indirectly result in GHG emission reductions. Specific efficiencies that would reduce GHG emissions shall be implemented where feasible, for all project areas including site design, landscaping, foundation, structural frame and building envelope, exterior finishing, plumbing, appliance use, insulation, heating, venting and air conditioning, building performance, use of renewable energy, finishes, and flooring.</u></p> <p><u>Project developers should be encouraged to incorporate any combination of the following strategies to reduce heat gain of the non-roof impervious site landscape (including roads, sidewalks, courtyards, parking lots, and driveways) into the construction and design of all new (additions of 25,000 square feet of office/retail commercial) projects:</u></p> <ul style="list-style-type: none"> ▶ <u>Shaded (Within 5 years of occupancy)</u> ▶ <u>Paving materials with a Solar Reflective Index (SRI) of at least 29</u> ▶ <u>Open grid pavement system (pavement that is less than 50% impervious and contains vegetation in the open cells)</u> ▶ <u>Parking spaces under cover (defined as underground, under deck, under roof, or under building). Any roof used to shade or cover parking should have an SRI of</u> 					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>at least 29.</p> <ul style="list-style-type: none"> ▶ <u>Optional level of LEED certification, such as silver or gold which can allow for further reductions in energy consumption and GHG emissions.</u> <p><u>Water Conservation and Efficiency</u></p> <p><u>The Project includes water conservation as part of the project. In addition, the project would comply with Title 22, Chapter 32.180, “Water Use and Conservation,” of the City’s Municipal Code, which specifies design criteria for irrigation systems and requirements for plant selection. These requirements include but are not limited to: installation of irrigation systems that minimize overspray and runoff, use of control valves to account for different site-specific characteristics and use of rain shutoff systems, and installation of plants that are suited to the local climate and require moderate amounts of water (Sections 22.180.070 and 22.180.080). In addition, the following should be considered:</u></p> <ul style="list-style-type: none"> ▶ <u>With the exception of ornamental shade trees, use water-efficient landscapes with native, drought-resistant species in all public area and commercial landscaping.</u> ▶ <u>Install the infrastructure to use recycled water for landscape irrigation. (Part of the project)</u> ▶ <u>Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.</u> ▶ <u>Design buildings and lots to be water-efficient. Install water-efficient fixtures and appliances. (e.g., Ultra low-flow toilets, no flow urinals etc.)</u> ▶ <u>Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces). Prohibit businesses from using pressure washers for cleaning driveways, parking lots, sidewalks, and street surfaces unless required to mitigate health and safety concerns.</u> <p><u>Solid Waste Measures</u></p> <p><u>Project developers should be encouraged to incorporate any combination of the following strategies:</u></p> <ul style="list-style-type: none"> ▶ <u>Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).</u> ▶ <u>Provide interior and exterior storage areas for recyclables and green waste at all buildings.</u> ▶ <u>Provide adequate recycling containers in public areas, including parks, school grounds, paseos, and pedestrian zones in areas of mixed-use development.</u> ▶ <u>Provide education and publicity about reducing waste and available recycling services.</u> <p><u>Transportation and Motor Vehicles</u></p> <p><u>Project developers should be encouraged to incorporate any combination of the following strategies:</u></p> <ul style="list-style-type: none"> ▶ <u>Promote ride sharing programs at employment centers (e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading zones and waiting areas for ride share vehicles, and providing a web site or message board for coordinating ride sharing).</u> ▶ <u>Provide the necessary facilities and infrastructure in all land use types to encourage the use of low or zero emission vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations).</u> 					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> ▶ <u>At commercial land uses, all forklifts, “yard trucks,” or vehicles that are predominately used on-site at non-residential land uses should be electric-powered or powered by biofuels (such as biodiesel [B100]) that are produced from waste products, or shall use other technologies that do not rely on direct fossil fuel consumption.</u> ▶ <u>Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations).</u> ▶ <u>Prioritized parking within new commercial and retail areas shall be given to electric vehicles, hybrid vehicles, and alternative fuel vehicles.</u> ▶ <u>Incorporate bicycle lanes, routes, and intersection improvements into street systems within the Specific Plan.</u> ▶ <u>For commercial land uses, provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience.</u> ▶ <u>For commercial land uses, provide “end-of-trip” facilities including showers, lockers, and changing space.</u> ▶ <u>Create Class II bicycle lanes and walking paths directed to the location of schools, parks and other destination points.</u> ▶ <u>Construction of transit facility/amenity (bus shelters, bicycle lockers/racks, etc.) for existing public and private transit.</u> ▶ <u>Provide secure bicycle storage at public parking facilities.</u> ▶ <u>Design site and building placement to facilitate the expansion and use of alternative modes of transportation, and integrate the project site with the surrounding development and circulation pattern by creating street and pedestrian/bicycle access throughout the project site to enable trips without depending exclusively on major roads, secondary roads, or the automobile.</u> ▶ <u>Design roadways to reduce motor vehicle speeds and encourage pedestrian and bicycle trips by featuring traffic calming features.</u> <p><u>Timing:</u> Throughout project construction of all project phases.</p> <p><u>Enforcement:</u> City of Rancho Cordova Planning Department.</p> <p><u>Mitigation Measure 3.15-7d: Locate Electrical Outlets to Support Use of Electrical Landscaping Equipment.</u> The project applicant(s) for all project phases containing residential uses shall promote a reduction in residential emissions by encouraging the installation of conveniently located electrical outlets within the front, side, and rear yards of all residential structures, as appropriate, to support the use of electrical landscaping equipment.</p> <p><u>Timing:</u> Throughout project construction of all residential phases.</p> <p><u>Enforcement:</u> City of Rancho Cordova Planning Department.</p> <p><u>NP:</u> No mitigation measures are required.</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Project Level (Phase 1)					
Impact 3.15-8: Generation of Temporary, Short-Term Construction Emissions of ROG, NO_x, and PM₁₀	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.15-1.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.15-9: Generation of Long-Term Operational (Regional) Emissions of ROG, NO_x, and PM₁₀	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.15-2.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.15-10: Generation of Local Mobile-Source CO Emissions	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
Impact 3.15-11: Exposure of Sensitive Receptors to Short- and Long-Term Emissions of Toxic Air Contaminants	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.15-4.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.15-12: Possible Exposure of Sensitive Receptors to Odorous Emissions	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Implement Mitigation Measure 3.15-5.</p> <p>NP: No mitigation measures are required.</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.15-13: Possible Exposure to Hazardous Indoor Emissions of Air Pollutants	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.15-14: Increase in Long-Term Atmospheric Greenhouse Gas Emissions	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
PP, HD, IM, NF: Implement Mitigation Measures <u>3.15-2</u> , <u>3.15-7a</u> , and <u>3.15-7b</u> . NP: No mitigation measures are required.					
3.16 NOISE					
Program Level					
Impact 3.16-1: Temporary Exposure to Construction-Generated Noise	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
PP, HD, IM, NF: Mitigation Measure 3.16-1: Implement Measures to Prevent Exposure of Sensitive Receptors to Temporary Construction-Generated Noise. To reduce impacts associated with noise generated during construction activities, the project applicant(s) for all project phases shall conform to the following requirements:					
<ul style="list-style-type: none"> ▶ Noise-generating construction operations shall be limited to the hours between 7 a.m. and 7 p.m. Monday through Friday, and between 8 a.m. and 6 p.m. on Saturday and Sunday. ▶ All construction equipment and equipment staging areas shall be located as far as possible from nearby noise-sensitive land uses. ▶ All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation. ▶ All motorized construction equipment shall be shut down when not in use to prevent idling. ▶ The following measures shall be required for exterior activities that involve the use of heavy-duty construction equipment (see Table 3.16-8) located within 800 feet of occupied noise-sensitive daytime land uses (e.g., school classrooms, childcare and convalescent care facilities, inpatient medical facilities, places of worship): 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> Individual operations and techniques shall be replaced with quieter procedures (e.g., using welding instead of riveting, mixing concrete off-site instead of on-site). Written notification of construction activities shall be provided to all noise-sensitive receptors located within 800 feet of construction activities. Notification shall include anticipated dates and hours during which construction activities are anticipated to occur and contact information, including a daytime telephone number, for the project representative to be contacted in the event that noise levels are deemed excessive. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) shall also be included in the notification. To the extent feasible, acoustic barriers (e.g., lead curtains, sound barriers) shall be constructed to reduce construction-generated noise levels at affected noise-sensitive land uses. The barriers shall be designed to obstruct the line of sight between the noise-sensitive land use and on-site construction equipment. When installed properly, acoustic barriers can reduce construction noise levels by approximately 8–10 dBA (EPA 1971). <p>Timing: During all phases of project construction.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.16-2: Potential Exposure to Stationary-Source Noise Generated by On-Site Land Uses	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.16-2: Implement Measures to Reduce Potential Exposure of Sensitive Receptors to Stationary Source–Generated Noise. To reduce potential long-term exposure of sensitive receptors to noise generated by City-controlled, project-related stationary noise sources from private activities, the City shall evaluate individual facilities, subdivisions, and other project elements for compliance with the City Noise Ordinance and policies contained in the City General Plan. All project elements shall comply with City noise standards. The project applicant(s) for all project phases shall implement the following measures to assure maximum reduction of project interior and exterior noise levels from operational activities.</p> <ul style="list-style-type: none"> The proposed land uses shall be designed so that on-site mechanical equipment (e.g., HVAC units, compressors, generators) and area-source operations (e.g., loading docks, parking lots, and recreational-use areas) are located as far as possible from or shielded from nearby noise-sensitive land uses. Residential air conditioning units shall be located a minimum of 10 feet from adjacent residential dwellings, including outdoor entertainment and relaxation areas, or shall be shielded to reduce operational noise levels at adjacent dwellings or designed to meet City noise standards. Shielding may include the use of fences or partial equipment enclosures. To be effective, fences or barriers need to be continuous or solid, with very few gaps, and must block the line of sight to windows of neighboring dwellings. Achieved noise reductions from fences or barriers can vary, but typically range from approximately 5 to 10 dBA, depending on construction characteristics, height, and location. To the extent feasible, residential land uses located within 2,500 feet and within the direct line of sight of major noise-generating commercial and industrial land uses (e.g., loading docks, manufacturing facilities, equipment/vehicle storage and repair facilities, and material processing areas such as concrete batch plants) shall be shielded from the line of sight of these facilities by construction of a sound barrier. To be effective, fences or sound barriers need to be continuous or solid, with 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>very few gaps, and must block the line of sight to windows of neighboring dwellings. Achieved noise reductions from fences or barriers can vary, but typically range from approximately 5 to 10 dBA, depending on construction characteristics, height, and location. The developer shall obtain the services of a professional acoustician to determine the design and location of noise barriers to be constructed.</p> <ul style="list-style-type: none"> ▶ Dual-pane, noise-rated windows; mechanical air systems; exterior wall insulation; and other noise-reducing building materials shall be used. <p>In addition, the City shall seek to reduce potential long-term exposure of sensitive receptors to noise generated by project-related stationary noise sources from public activities on school grounds, in neighborhood and community parks, and in open-space areas. Specifically, the City shall encourage the controlling agencies (i.e., schools and park and recreation districts) to implement measures to reduce project interior and exterior noise levels to within acceptable levels, including but not limited to the following:</p> <ul style="list-style-type: none"> ▶ On-site landscape maintenance equipment shall be equipped with properly operating exhaust mufflers and engine shrouds, in accordance with manufacturers' specifications. ▶ For maintenance areas located within 500 feet of noise-sensitive land uses, the operation of on-site landscape maintenance equipment shall be limited to the least noise-sensitive periods of the day, between the hours of 7 a.m. and 7 p.m. ▶ Outdoor use of amplified sound systems within 500 feet of noise-sensitive land uses shall be permitted only between 7 a.m. and 10 p.m. Sunday through Thursday, and between 7 a.m. and 11 p.m. on Friday and Saturday. ▶ During subsequent environmental review of future project phases, the project applicant(s) shall demonstrate that the amphitheater and adjacent residences have been designed to reduce noise exposure to noise-sensitive uses to the maximum extent feasible. An acoustical engineer with experience in the prediction and mitigation of outdoor theater sound levels shall be consulted prior to design and construction of the proposed amphitheater and residences proposed within 1,500 feet of the amphitheater. The acoustical engineer shall identify all feasible mitigation measures available for reducing noise-related impacts to nearby noise-sensitive receptors. Mitigation measures may include, but are not limited to, orientation and location of amphitheater, construction of noise barriers, limitations on speaker orientation, limitations on noise-generation levels, and hours of activity. The project applicant(s) shall incorporate the mitigation measures into the design and operation of the amphitheater and nearby residential uses. <p>Timing: During design review and before the approval of all improvement plans, where applicable for all project phases. For measures that the City should encourage other agencies to undertake, before the approval of final maps for all project phases for noise-generating school and park and recreation sites.</p> <p>Enforcement: City of Rancho Cordova Building and Safety and Planning Departments.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.16-3: Potential Exposure to Off-Site Stationary-Source Noise	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
PP, HD, IM, NF: Implement Mitigation Measure 3.16-2.					
NP: No mitigation measures are required.					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.16-4: Project-Generated Increases in Traffic Noise Levels on Area Roadways.	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.16-5: Compatibility of Proposed Land Uses with Projected Noise Levels	Direct & Indirect SU(m)	Direct & Indirect SU(m),	Direct & Indirect SU(m)	Direct & Indirect SU(m)	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.16-5: Implement Measures to Improve Land Use Compatibility with Noise Sources. To meet City noise standards set forth in the City General Plan and Noise Ordinance and improve compatibility between project land uses and noise sources, the project applicant(s) for all project phases shall implement the following for all project phases:</p> <ul style="list-style-type: none"> ▶ Implement Mitigation Measure 3.16-2 described above. ▶ Obtain the services of a consultant (such as a licensed engineer or licensed architect) to develop noise attenuation measures for the proposed construction of on-site noise-sensitive land uses (i.e., residential dwellings and school classrooms) that will produce a minimum composite Sound Transmission Class (STC) rating for buildings of 30 or greater, individually computed for the walls and the floor/ceiling construction of buildings, for the proposed construction of on-site noise-sensitive land uses (i.e., residential dwellings and school classrooms). ▶ When tentative subdivision maps and commercial uses are proposed, the project applicant(s) shall conduct a site-specific acoustical analysis to determine predicted roadway noise impacts attributable to the project, taking into account site-specific conditions (e.g., site design, location of structures, building characteristics). The acoustical analysis shall evaluate stationary- and mobile-source noise attributable to the proposed use or uses and impacts on nearby noise-sensitive land uses, in accordance with adopted City noise standards. Feasible measures shall be identified to reduce project-related noise impacts. Measures may include, but are not limited to, the following: <ul style="list-style-type: none"> • construction of exterior sound walls; • use of increased noise-attenuation measures in building construction (e.g., dual-pane, sound-rated windows; exterior wall insulation); and • limiting noise-generating operational activities associated with proposed commercial land uses, including truck deliveries. <p>In addition, to reduce impacts associated with noise generated during ongoing mining activities, the project applicant(s) for all project phases shall implement the following measures where mining activities would be located within 1,100 feet of occupied noise-sensitive daytime land uses (e.g., school classrooms, childcare and convalescent care facilities, inpatient medical facilities):</p> <ul style="list-style-type: none"> ▶ Written notification of mining activities shall be provided to noise-sensitive receptors located within 1,100 feet of mining activities. Notification shall include anticipated hours during which mining activities are anticipated to occur and contact information, including a daytime telephone number, for the project 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>representative to be contacted if noise levels are deemed excessive. The notification shall also include recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors).</p> <p>► Occupied noise-sensitive receptors shall not be located within 1,100 feet of mining equipment/activities unless a temporary barrier is constructed in accordance with the following specifications:</p> <ul style="list-style-type: none"> • The barrier shall be placed as close to the noise source or as close to the receptor as possible and shall break the line of sight between the source and receptor. • The barrier shall be constructed of three-quarter-inch Medium Density Overlay (MDO) plywood sheeting, or other acceptable material that has a surface weight of 2 pounds per square foot (lb/sf) or greater and a demonstrated STC rating of 25 or greater, as defined by American Society for Testing and Materials (ASTM) Test Method E90. • If a temporary acoustical curtain is used, the material shall be weather and abuse resistant and shall exhibit superior hanging and tear strength during construction, with a surface weight of at least 1 lb/sf. The material shall have a minimum breaking strength of 120 pounds per inch (lb/in) per Federal Test Method Standard (FTMS) 191 A-M5102 and a minimum tear strength of 30 lb/in per ASTM D117. Based on the same test procedures, the absorptive material facing shall have a minimum breaking strength of 100 lb/in and a minimum tear strength of 7 lb/in. The material shall have an STC rating of 25 or greater, based on certified sound transmission loss data taken according to ASTM Test Method E90. It shall also have a Noise Reduction Coefficient rating of 0.70 or greater, based on certified sound absorption coefficient data according to ASTM Test Method C423. • When barrier units are joined together, the mating surfaces of the barrier sides shall be flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that will completely close the gaps, and be dense enough to attenuate noise. <p>Furthermore, to reduce impacts associated with aircraft noise, the project applicant(s) for all project phases shall implement the following measures:</p> <p>► Ensure that aviation easements are prepared before completion of final maps, and submitted with the final maps to the Department of Airports. Such aviation easements shall acknowledge the property’s location within the MAPA and shall grant the right of flight and unobstructed passage of all aircraft into and out of Mather Airport.</p> <p>► Provide notification in a public report, to be prepared by the California Department of Real Estate, disclosing to prospective buyers that parcels to be purchased are located within the MAPA and that an aviation easement exists for aircraft into and out of Mather Airport. Revise relevant portions of project land use plans to be compatible with the existing noise contours if the proposed Mather Airport noise contours are not adopted.</p> <p>► <u>Project-related residential development within the MAPA boundaries but outside the 60-dB CNEL contour shall be subject to the following conditions before approval by the City of Rancho Cordova:</u></p> <ul style="list-style-type: none"> • <u>minimum noise insulation to protect persons from excessive noise within new residential dwellings (including detached single-family dwellings) that limits noise to 45 dB CNEL with windows closed in any habitable room;</u> • <u>notification in the public report prepared by the California Department of Real Estate disclosing to prospective buyers that the parcel is located within the applicable airport planning policy area and that aircraft operations can be expected to overfly that area at varying altitudes less than 3,000 feet above ground level; and</u> 					

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> <u>execution and recordation with the County Recorder of avigation easements prepared by the County Counsel’s office on each individual residential parcel contemplated in the development. All avigation easements recorded pursuant to this policy shall, once recorded, be copied to the Director of Airports and shall acknowledge the property location within the appropriate airport planning policy area and shall grant the right of flight and unobstructed passage of all aircraft into and out of the appropriate airport.</u> <p><u>Exceptions: New accessory residential dwellings on parcels zoned Agricultural, Agricultural Residential, Interim Agricultural, Interim General Agricultural, or Interim Limited Agricultural shall be exempt from the airport planning policy area’s prohibitions.</u></p> <p>Timing: Before the recordation of <u>small-lot</u> final maps and during all project construction activities for all project phases where applicable.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.16-6: Potential Exposure to Single-Event Aircraft Noise Levels Exceeding Applicable Standards</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.16-5.</p> <p>NP: No mitigation measures are required.</p>	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
Project Level (Phase 1)					
<p>Impact 3.16-7: Temporary Exposure to Construction-Generated Noise</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.16-1.</p> <p>NP: No mitigation measures are required.</p>	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	Direct & LTS(m), No Indirect	No Direct, No Indirect
<p>Impact 3.16-8: Potential Exposure to Stationary-Source Noise Generated by On-Site Land Uses</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.16-2.</p> <p>NP: No mitigation measures are required.</p>	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect

**Table 1-1
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2006 DEIR/DEIS¹**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.16-9: Potential Exposure to Off-Site Stationary-Source Noise</p> <p>Direct & SU(m), No Indirect</p> <p>Direct & SU(m), No Indirect</p> <p>Direct & SU(m), No Indirect</p> <p>Direct & SU(m), No Indirect</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.16-3.</p> <p>NP: No mitigation measures are required.</p>	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>Impact 3.16-10: Project-Generated Increases in Traffic Noise Levels on Area Roadways</p> <p>Direct & LTS, No Indirect</p> <p>Direct & LTS, No Indirect</p> <p>Direct & LTS, No Indirect</p> <p>Direct & LTS, No Indirect</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
<p>Impact 3.16-11: Compatibility of Proposed Land Uses with Projected Noise Levels</p> <p>Direct & Indirect SU(m)</p> <p>Direct & Indirect SU(m)</p> <p>Direct & Indirect SU(m)</p> <p>Direct & Indirect SU(m)</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.16-5.</p> <p>NP: No mitigation measures are required.</p>	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	Direct & Indirect SU(m)	No Direct, No Indirect
<p>Impact 3.16-12: Potential Exposure to Single-Event Aircraft Noise Levels Exceeding Applicable Standards</p> <p>Direct & SU(m), No Indirect</p> <p>Direct & SU(m), No Indirect</p> <p>Direct & SU(m), No Indirect</p> <p>Direct & SU(m), No Indirect</p> <p>PP, HD, IM, NF: Implement Mitigation Measure 3.16-6.</p> <p>NP: No mitigation measures are required.</p>	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	Direct & SU(m), No Indirect	No Direct, No Indirect
<p>¹ "Phase 1" refers to development of the portion of the project site owned by Elliott Homes. As evaluated in the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS, Phase 1 consisted of the property shown in the 2006 DEIR/DEIS Exhibit 2-14. The Phase 1 boundaries have been revised as shown in Exhibit 2-1 in Chapter 2, "Minor Modifications to the Proposed Project" of this FEIR/FEIS.</p>					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.5 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY					
Program Level					
Impact 3.5-1: Need for Initial Water Supplies for Development Phase 1A.	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.5-2: Need for Initial Water Supplies for the Remaining Phase 1 Development.	Direct & S, No Indirect	Direct & S, No Indirect	Direct & S, No Indirect	Direct & S, No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.5-2: Submit Proof of Water Supply Availability. 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 subdivision maps, parcel maps, use permits, and other project-specific discretionary land-use entitlements or approvals:</p> <ul style="list-style-type: none"> ▶ 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 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. 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. <p>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:</p> <ul style="list-style-type: none"> ▶ An assured water supply and delivery system shall be available or reasonably foreseeable 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. ▶ The project applicant, water agency (or agencies), or water company (or companies) providing water service to the project site shall 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 nonresidential approval or entitlement. This assurance of water supply shall identify that the water provider has legal entitlement to the water source and that the water source 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. 					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Timing: Before approval of project-specific discretionary land-use entitlements and approvals (<u>subsequent to the approval of the specific plan</u>), including all final small-lot maps; or for nonresidential projects, before issuance of use permits, building permits, or other entitlements.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>Implementation of Mitigation Measure 3.5-2 would reduce significant impacts related to the need for initial water supplies to serve the remaining Phase 1 development under the under the Proposed Project, High Density, Impact Minimization, and No Federal Action Alternatives to a less-than-significant level because the City would require written certification verifying the availability of a long-term, reliable water supply for the project or that needed improvements will be in place prior to occupancy.</p> <p>If water supply for remaining Phase 1 development is not available because of unknown or unforeseeable events after approval and construction of the remaining Phase 1 development begins, implementation of Mitigation Measure 3.5-2 would result in the curtailment of development, resulting in a partially built-out project. Impacts associated with the curtailment of development are evaluated below in Impact 3.5-4.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.5-3: Need for Initial Off-Site Water Conveyance Facilities.					
Air Quality	LTS	LTS	LTS	LTS	No Direct, No Indirect
Biological Resources	LTS	LTS	LTS	LTS	No Direct, No Indirect
Cultural Resources	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Drainage, Hydrology, and Water Quality	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Environmental Justice	No Direct / Indirect	No Direct / Indirect	No Direct / Indirect	No Direct / Indirect	No Direct, No Indirect
Geology, Soils, and Mineral Resources	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Hazards and Hazardous Materials	No Direct / Indirect	No Direct / Indirect	No Direct / Indirect	No Direct / Indirect	No Direct, No Indirect

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Land Use	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Noise	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Paleontological Resources	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Parks and Recreation	Indirect & LTS	Indirect & LTS	Indirect & LTS	Indirect & LTS	No Direct, No Indirect
Population, Employment, and Housing	Indirect & LTS	Indirect & LTS	Indirect & LTS	Indirect & LTS	No Direct, No Indirect
Public Services	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Traffic and Transportation	No Direct or Indirect	No Direct or Indirect	No Direct or Indirect	No Direct or Indirect	No Direct, No Indirect
Utilities and Service Systems	Indirect & LTS	Indirect & LTS	Indirect & LTS	Indirect & LTS	No Direct, No Indirect
Visual Resources	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure 3.5-3: Submit Proof of an Off-Site and On-Site Infrastructure Delivery System or Assure that Adequate Financing is Secured. 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:</p> <ul style="list-style-type: none"> ▶ 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, 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. 					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>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:</p> <ul style="list-style-type: none"> ▶ Off-site and on-site water infrastructure sufficient to provide adequate water to the subdivision shall be in place prior to 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 nonresidential land uses. ▶ Off-site and on-site 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. <p>Timing: Before the approval of project-specific, discretionary land-use entitlements and approvals (<u>subsequent to the approval of the specific plan</u>), including all final small-lot maps, or for nonresidential projects, before the issuance of use permits, building permits, or other entitlements.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>Implementation of Mitigation Measure 3.5-3 would reduce direct, potentially significant impacts under the Proposed Project, High Density, Impact Minimization, and No Federal Action Alternatives related to off-site water conveyance facilities to a less-than-significant level, because off-site water conveyance facilities sufficient to convey water supplies to subdivisions or nonresidential uses would be in place before recordation of any final small-lot subdivision map, or before the City approves any similar project-specific, discretionary approval or entitlement required for nonresidential uses. Implementation of Mitigation Measures 3.4-3, 3.6-1, and 3.9-3 from the 2006 DEIR/DEIS would reduce indirect significant impacts under the Proposed Project, High Density, Impact Minimization, and No Federal Action Alternatives related to off-site water conveyance facilities to a less-than-significant level, because adverse impacts on cultural resources would be avoided, appropriate BMPs would be implemented to control erosion, and a traffic plan would be developed and implemented during construction activities.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.5-4: Temporary Curtailment of Project Development.					
Land Use	Direct & S	Direct & S	Direct & S	Direct & S	No Direct, No Indirect
Population, Employment, and Housing	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Environmental Justice	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Drainage, Hydrology, and Water Quality	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Utilities and Service Systems	Indirect & S	Indirect & S	Indirect & S	Indirect & S	No Direct, No Indirect
Public Services	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Geology, Soils, and Mineral Resources	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Paleontological Resources	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Cultural Resources	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Biological Resources	Indirect & S	Indirect & S	Indirect & S	Indirect & S	No Direct, No Indirect
Visual Resources	Direct & S	Direct & S	Direct & S	Direct & S	No Direct, No Indirect
Parks and Recreation	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Hazards and Hazardous Materials	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Traffic and Transportation	Direct & S	Direct & S	Direct & S	Direct & S	No Direct, No Indirect
Air Quality	Direct & S	Direct & S	Direct & S	Direct & S	No Direct, No Indirect
Noise	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>PP, HD, IM, NF: Mitigation Measure: Implement the same mitigation measures called for in the 2006 DEIR/DEIS and in this Recirculated DEIR/Supplemental DEIS, as specifically set forth in Table ES-1.</p> <p>Implementation of the same mitigation measures called for in the 2006 DEIR/DEIS would reduce potentially significant and significant impacts related to curtailment of development for the same reasons elaborated in each section of Chapter 3, “Affected Environment, Environmental Consequences, and Mitigation Measures” of the 2006 DEIR/DEIS.</p> <p>NP: No mitigation measures are required.</p>					
<p>Impact 3.5-5: Increased Demand for Permanent Water Supplies.</p>	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	No Direct, No Indirect
<p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>					
<p>Impact 3.5-6: Need for Water Conveyance Facilities to Deliver Long-Term Water Supplies.</p>	Direct & PS	Direct & PS	Direct & PS	Indirect and Direct SU	No Direct, No Indirect
<p>PP, HD, IM: Mitigation Measure: Implement Mitigation Measure 3.5-3.</p> <p>Implementation of Mitigation Measure 3.5-3 would reduce direct, potentially significant impacts under the Proposed Project, High Density, and Impact Minimization Alternatives related to on-site and off-site water conveyance facilities to a less-than-significant level, because water conveyance facilities sufficient to convey water supplies to subdivisions or nonresidential uses would be in place before recordation of any final small-lot subdivision map, or before City approval of any similar project-specific, discretionary approval or entitlement required for nonresidential uses. If on-site or off-site water conveyance facilities are delayed or not constructed, implementation of Mitigation Measure 3.5-3 would cause project development to be permanently curtailed because existing water supplies may not be available to meet the demands of the project. Impacts associated with permanent curtailment of development are discussed in Impact 3.5-7.</p> <p>Regarding expansion of Zone 40 water supply facilities and infrastructure, implementation of mitigation measures to reduce impacts is the responsibility of Zone 40. Such measures would be implemented in accordance with the certified Zone 40 EIR prepared by SCWA. Impacts on seven issue areas would remain significant and unavoidable after implementation of mitigation.</p> <p>Similarly, implementation of mitigation measures to reduce impacts related to the expansion of the FRWP water supply facilities and infrastructure is the responsibility of SCWA and EBMUD. Such measures would be implemented in accordance with the certified FRWP EIR/EIS prepared by FRWA. Impacts on six issue areas would remain significant and unavoidable after implementation of mitigation.</p> <p>NF: Mitigation Measure: Implement Mitigation Measure 3.5-3.</p>					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Implementation of Mitigation Measure 3.5-3 would reduce direct potentially significant impacts under the No Federal Action Alternative related to off-site water conveyance facilities because the construction and financing of water conveyance facilities sufficient to convey water supplies to subdivisions or nonresidential uses would be reasonably foreseeable before recordation of any final small-lot subdivision map, or before City approval of any similar project-specific, discretionary approval or entitlement required for nonresidential uses. However, impacts would not be reduced to a less-than-significant level.</p> <p>Implementation of Mitigation Measure 3.5-3 under the No Federal Action Alternative would result in indirect off-site impacts related to water supply to surrounding development in Rancho Cordova, as follows:</p> <ul style="list-style-type: none"> ▶ Construction of new off-site alternative alignments of water conveyance facilities would be necessary to serve surrounding development. These alternative alignments would require separate CEQA review; therefore, the full extent of impacts cannot be determined. However, it is assumed that implementation of alternative pipeline alignments would result in significant impacts on biological resources, as well as significant construction-related impacts (i.e., construction-related traffic, air-quality emissions, water quality, and noise impacts). ▶ If new water conveyance facilities with alternative alignments could not be constructed off-site, temporary or permanent curtailment of planned development in the surrounding area could result from a lack of necessary water conveyance facilities. Curtailing planned off-site development could result in its own set of potentially significant impacts, including a lack of funding that might be necessary to implement infrastructure (e.g., roads, sewer, and water) required on a regional or local level. <p>Identification of alternative water supply pipeline alignments would fall under the jurisdiction of the County and SWCA; therefore, neither the City nor the project applicant(s) could guarantee approval of these alternative pipeline alignments. Additionally, it is possible that these alternative alignments would be inconsistent with SWCA's WSMP and would be subject to separate CEQA compliance. For these reasons, this impact would remain significant and unavoidable. If the County, SWCA, and other potentially affected agencies cooperate in allowing the improvements to move forward, the impact would be classified as significant in the short term but eventually could be reduced to a less-than-significant level in the long term, depending on the outcome of the separate CEQA evaluation (if needed).</p> <p>Regarding expansion of Zone 40 water supply facilities and infrastructure, implementation of mitigation measures to reduce impacts is the responsibility of Zone 40. Such measures would be implemented in accordance with the certified Zone 40 EIR prepared by SCWA. Impacts on seven issue areas would remain significant and unavoidable after implementation of mitigation.</p> <p>Similarly, implementation of mitigation measures to reduce impacts related to the expansion of the FRWP's water-supply facilities and infrastructure is the responsibility of SCWA. Such measures would be implemented in accordance with the certified FRWP EIR/EIS prepared by SCWA. Impacts on six issue areas would remain significant and unavoidable after implementation of mitigation.</p> <p>If on-site or off-site water conveyance facilities are delayed or not constructed, implementation of Mitigation Measure 3.5-3 would cause project development to be curtailed. Impacts associated with the curtailment of development are discussed in Impact 3.5-7.</p> <p>NP: No mitigation measures are required</p>					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.5-7: Permanent Curtailment of Project Development.	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.5-8: Use of Nonpotable-Water Supplies and Infrastructure.	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.5-9: Effects of Global Climate Change on Surface-Water and Groundwater Supplies.	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Project Level (Phase 1)					
Impact 3.5-10: Need for Initial Water Supplies for Development Phase 1A.	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	Direct & LTS, No Indirect	No Direct, No Indirect
PP, HD, IM, NF, NP: No mitigation measures are required.					
Impact 3.5-11: Need for Initial Water Supplies for the Remaining Phase 1 Development.	Direct & S, No Indirect	Direct & S, No Indirect	Direct & S, No Indirect	Direct & S, No Indirect	No Direct, No Indirect
PP, HD, IM, NF: Mitigation Measure: Implement Mitigation Measure 3.5-2. NP: No mitigation measures are required.					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Impact 3.5-12: Need for Initial Off-Site Water Conveyance Facilities.					
Air Quality	LTS	LTS	LTS	LTS	No Direct, No Indirect
Biological Resources	LTS	LTS	LTS	LTS	No Direct, No Indirect
Cultural Resources	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Drainage, Hydrology, and Water Quality	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Environmental Justice	No Direct / Indirect	No Direct / Indirect	No Direct / Indirect	No Direct / Indirect	No Direct, No Indirect
Geology, Soils, and Mineral Resources	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Hazards and Hazardous Materials	No Direct / Indirect	No Direct / Indirect	No Direct / Indirect	No Direct / Indirect	No Direct, No Indirect
Land Use	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Noise	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Paleontological Resources	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Parks and Recreation	Indirect & LTS	Indirect & LTS	Indirect & LTS	Indirect & LTS	No Direct, No Indirect

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Population, Employment, and Housing	Indirect & LTS	Indirect & LTS	Indirect & LTS	Indirect & LTS	No Direct, No Indirect
Public Services	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Traffic and Transportation	No Direct or Indirect	No Direct or Indirect	No Direct or Indirect	No Direct or Indirect	No Direct, No Indirect
Utilities and Service Systems	Indirect & LTS	Indirect & LTS	Indirect & LTS	Indirect & LTS	No Direct, No Indirect
Visual Resources	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
<p>PP, HD, IM, NF: Mitigation Measure: Implement Mitigation Measure 3.5-3.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.5-13: Temporary Curtailment of Project Development.					
Land Use	Direct & S	Direct & S	Direct & S	Direct & S	No Direct, No Indirect
Population, Employment, and Housing	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Environmental Justice	Direct & LTS	Direct & LTS	Direct & LTS	Direct & LTS	No Direct, No Indirect
Drainage, Hydrology, and Water Quality	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Utilities and Service Systems	Indirect & S	Indirect & S	Indirect & S	Indirect & S	No Direct, No Indirect

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
Public Services	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Geology, Soils, and Mineral Resources	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Paleontological Resources	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Cultural Resources	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Biological Resources	Indirect & S	Indirect & S	Indirect & S	Indirect & S	No Direct, No Indirect
Visual Resources	Direct & S	Direct & S	Direct & S	Direct & S	No Direct, No Indirect
Parks and Recreation	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Hazards and Hazardous Materials	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
Traffic and Transportation	Direct & S	Direct & S	Direct & S	Direct & S	No Direct, No Indirect
Air Quality	Direct & S	Direct & S	Direct & S	Direct & S	No Direct, No Indirect
Noise	Direct & PS	Direct & PS	Direct & PS	Direct & PS	No Direct, No Indirect
PP, HD, IM, NF: Mitigation Measure: Implement Mitigation Measure 3.5-4.					
NP: No mitigation measures are required.					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.5-14: Increased Demand for Permanent Water Supplies.</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	No Direct, No Indirect
<p>Impact 3.5-15: Need for Water Conveyance Facilities to Deliver Long-Term Water Supplies.</p> <p>PP, HD, IM, NF: Mitigation Measure: Implement Mitigation Measure 3.5-3. NP: No mitigation measures are required.</p>	Direct & PS	Direct & PS	Direct & PS	Indirect and Direct SU	No Direct, No Indirect
<p>Impact 3.5-16: Permanent Curtailment of Project Development.</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	No Direct, No Indirect
<p>Impact 3.5-17: Use of Nonpotable-Water Supplies and Infrastructure.</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	No Direct, No Indirect
<p>Impact 3.5-18: Effects of Global Climate Change on Surface-Water and Groundwater Supplies.</p> <p>PP, HD, IM, NF, NP: No mitigation measures are required.</p>	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	Direct & LTS. No Indirect	No Direct, No Indirect

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
3.10 BIOLOGICAL RESOURCES					
Program Level					
Impact 3.10-1: Loss and Degradation of Jurisdictional Wetlands and Other Waters of the United States, and Waters of the State.	Direct & Indirect S	Direct & Indirect S	Direct LTS & Indirect S.	Indirect S & SU	No Direct, No Indirect
<p>PP, HD, IM: Mitigation Measure 3.10-1a: Secure Clean Water Act Section 404 Permit and Implement All Permit Conditions, and Ensure No Net Loss of Wetlands, Other Waters of the United States, and Associated Functions and Values. Before the approval of grading and improvement plans and before any groundbreaking activity associated with each distinct project phase, the project applicant(s) for each project phase requiring the fill of wetlands or other waters of the United States or waters of the state shall obtain all necessary permits under Sections 401 and 404 of the CWA or the State’s Porter-Cologne Act for the respective phase. The project applicant(s) shall commit to replace, restore, or enhance on a “no net loss” basis (in accordance with USACE, the Central Valley RWQCB, and the Natural Resources Element of the City General Plan) the acreage of all wetlands and other waters of the United States subject to USACE jurisdiction and waters of the state subject to RWQCB jurisdiction and the City General Plan that would be removed, lost, and/or degraded with implementation of project plans for that phase. Wetland habitat shall be restored, enhanced, and/or replaced at an acreage and location and by methods agreeable to USACE, the Central Valley RWQCB, and the City, as appropriate depending on agency jurisdiction, and as determined during the Section 401 and Section 404 permitting processes.</p> <p>To accomplish this mitigation, the project applicant(s) shall take the following steps:</p> <ul style="list-style-type: none"> ▶ The project applicant(s) shall conduct an assessment of representative portions of the proposed wetland preserves within the Rio del Oro property and any other proposed preserve areas using the California Rapid Assessment Method (CRAM) for Wetlands. Data shall be used to evaluate current conditions and serve as a baseline for future monitoring. The following requirements apply to the assessment of the proposed wetland preserves: <ul style="list-style-type: none"> • The field assessment shall be conducted during the flowering period for plant species associated with vernal pools, typically March through June. • The investigation shall define and evaluate assessment areas. Such areas shall be analyzed using 17 different metrics organized into four main attributes developed for vernal pool systems (<i>California Rapid Assessment Method for Wetlands Depressional Field Book</i>, Version 5.0, September 2007). Those attributes are: buffer and landscape context, hydrology, physical structure, and biotic structure. • CRAM scores shall be calculated for each assessment area by adding up the component metrics of each attribute and converting the sum into a percentage of the maximum score possible for that attribute. • The CRAM analysis shall also include a discussion of potential stressors associated with human activities within or surrounding the wetlands assessed, which may provide qualitative information regarding the CRAM scores. <p>The data collected during the initial assessment shall serve as the baseline (preproject condition), to which data collected during future monitoring efforts shall be compared.</p>					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>▶ As part of the Section 404 permitting process, a draft wetland MMP has been developed for the project (Appendix Q) by ECORP Consulting on behalf of the project applicant(s) (<u>ECORP 2009</u>). Before any ground-disturbing activities that would adversely affect wetlands and before engaging in mitigation activities associated with each phase of development, the project applicant(s) shall submit the draft wetland MMP to USACE, the Central Valley RWQCB, and the City for review and approval of those portions of the plan over which they have jurisdiction. Once the MMP is approved and implemented, mitigation monitoring will continue for a minimum of <u>5</u>10 years from completion of mitigation, or human intervention (including recontouring and grading), or until the performance standards identified in the approved MMP have been met, whichever is longer. <u>Monitoring reports shall include baseline CRAM scores and the CRAM scores from all previous years shall be plotted to show the “restoration trajectory.”</u></p> <p>The plan shall be prepared to the satisfaction of the City, in accordance with the City’s Grading and Erosion Control Ordinance, as well as to the satisfaction of those agencies with jurisdiction over all or portions of the plan.</p> <p>▶ In conjunction with preparation and implementation of an approved wetland MMP, the project applicant(s) shall prepare and submit plans for the creation of jurisdictional waters of the United States, including wetlands, at an adequate mitigation ratio to offset the aquatic functions and values that would be lost at the project site, account for the temporal loss of habitat, and contain an adequate margin of safety to reflect anticipated success. The MMPs must demonstrate how the aquatic functions and values that would be lost through project implementation will be replaced. The habitat MMP for jurisdictional wetland features will need to be consistent with USACE’s December 30, 2004, Habitat Mitigation and Monitoring Proposal Guidelines. The wetland MMP shall also mitigate impacts on vernal pool and seasonal wetland habitat, and shall describe specific method(s) to be implemented to avoid and/or mitigate any off-site project-related impacts. The wetland creation section of the habitat MMP shall include the following:</p> <ul style="list-style-type: none"> • target areas for creation; • a complete biological assessment of the existing resources in the target areas, including a CRAM analysis conducted during the wet season to establish baseline conditions; • specific creation and restoration plans for each target area; • performance standards for success that will illustrate that the compensation ratios are met; and • a monitoring plan, including schedule and annual report. As requested by EPA, the monitoring plan shall incorporate CRAM analysis and the following elements: <ul style="list-style-type: none"> – intensive monitoring of hydrology early on (this can be phased out as created wetlands are achieving target standards); – CRAM analysis conducted annually for 5 years after any construction adjacent to assessment areas to determine whether these areas are retaining functions and values; – analysis of CRAM data, including assessment of potential stressors, to determine whether any remedial activities may be necessary; – corrective measures if performance standards are not met; – monitoring of vegetation communities and targeted special-status species as success criteria for hydrologic function have become established and the creation site “matures” over time; – reference locations for comparison to compensatory vernal pools to document success; – adaptive management measures to be applied if performance standards are not being met; – responsible parties for monitoring and preparing reports; and – responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions. 					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<ul style="list-style-type: none"> • An operations and management plan for the Preserve shall be prepared and submitted to USACE and USFWS for review and approval. The plan shall include detailed information on the habitats present within the target area, the long-term management and monitoring of these habitats, legal protection for the target area (e.g., conservation easement, declaration of restrictions), and funding mechanism information (e.g., endowment). ▶ For each phase of development, including off-site project-related impacts, the project applicant(s) shall secure the permits and regulatory approvals described below and shall implement all permit conditions. For each respective phase, all permits, regulatory approvals, and permit conditions for effects on wetland habitats shall be secured before implementation of any grading activities within 250 feet of waters of the United States or wetland habitats, including waters of the state, that potentially support federally listed species. The setback may be reduced to a distance approved by the City and USFWS if a wetland avoidance plan is developed and implemented by a qualified biologist. The wetland avoidance plan must be approved by USFWS and the City and shall demonstrate that all direct and indirect impacts on wetlands will be avoided. Project phases in upland areas with no wetlands or waters of the United States within 250 feet, and no overland hydrologic flow patterns, the disturbance of which may affect such waters, may begin construction before these particular permits are obtained. Buffers around wetlands that do not support federally listed species shall be a minimum of 50 feet from the edge of these features in accordance with conditions of the National Pollutant Discharge Elimination System (NPDES) permit and associated best management practices (BMPs). See Section 3.4, “Drainage, Hydrology, and Water Quality,” of the 2006 DEIR/DEIS for a further discussion of the NPDES. • Authorization to place dredged or fill material into waters of the United States shall be secured from USACE through the CWA Section 404 permitting process before any fill is placed in jurisdictional wetlands or other waters of the United States. USACE has determined that the project will require an individual permit. In its final stage and once approved by USACE, the proposed MMP for the project is expected to detail proposed wetland restoration, enhancement, and/or replacement activities that would ensure no net loss of aquatic functions and values in the project vicinity. Approval and implementation of the wetland MMP shall fully mitigate all impacts on jurisdictional waters of the United States, including jurisdictional wetlands. In addition to USACE approval, approval by the City and the Central Valley RWQCB, as appropriate depending on agency jurisdiction, and as determined during the Section 401 and Section 404 permitting processes, will also be required. To satisfy the requirements of the City and the Central Valley RWQCB, mitigation of impacts on nonjurisdictional wetlands beyond the jurisdiction of USACE shall be included in the same mitigation and monitoring plan. All mitigation requirements determined through this process shall be implemented before grading plans are approved. Wetland mitigation must be approved before any impacts on <u>wetlands waters of the United States or waters of the state</u> commence. • Water quality certification pursuant to Section 401 of the CWA will be required before issuance of a Section 404 permit. Before construction in any areas containing wetland features, the project applicant(s) shall obtain water quality certification for the applicable phase of the project. Any measures required as part of the issuance of water quality certification shall be implemented. <p>If Section 401 and 404 permit requirements ensure no net loss of all wetland features, including vernal pools, and these requirements are addressed before any ground-disturbing activities, no additional mitigation will be required by the City. Written approval from the City indicating that these requirements fulfill all net-loss obligations must be obtained before the approval of grading or improvement plans or any ground-disturbing activities in any project phase containing wetland features.</p> <p>Timing: Before the approval of grading or improvement plans or any ground-disturbing activities for any project development phase containing wetland features. The MMP must be approved before any impact on wetlands can occur. Mitigation shall be implemented on an ongoing basis throughout and after construction, as required.</p>					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Enforcement: U.S. Army Corps of Engineers, Sacramento District; Central Valley Regional Water Quality Control Board; and City of Rancho Cordova Planning Department, as appropriate depending on agency jurisdiction, and as determined during the Section 401 and Section 404 permitting processes and in compliance with the City’s Grading and Erosion Control Ordinance.</p> <p>NF: The project applicant(s) for all project phases shall commit to replace, restore, or enhance on a “no net loss” basis (in accordance with the Central Valley RWQCB and the Natural Resources Element of the City General Plan) the acreage of all waters of the state. Waters of the state include all nonjurisdictional wetlands that would be removed, lost, and/or degraded with implementation of project plans for that phase that require permitting from the resource agencies. Wetland habitat shall be restored, enhanced, and/or replaced at an acreage and location and by methods agreeable to the Central Valley RWQCB and the City.</p> <p>NP: No mitigation measures are required.</p>					
<p>PP, HD, IM, NF: Mitigation Measure 3.10-1b: Include in Drainage Plans All Wetlands that Remain On-Site. A model-based watershed analysis was conducted by ECORP Consulting (Appendix Q) to determine hydrologic effects on wetlands within the 507-acre preserve. The long-term viability of the preserve was analyzed using all of the following factors:</p> <ul style="list-style-type: none"> ▶ the size of the preserve, ▶ the amount of watershed area required to support the wetlands within the preserve, ▶ the potential impacts from the construction of Rancho Cordova Parkway and Americanos Boulevard, ▶ the construction of the mitigation wetlands within the preserve, and ▶ the watershed area needed to support the hydrologic function of each mitigation wetland. <p>The proposed construction design includes measures to reduce interference with the hydrology that sustains vernal pools on-site, including the use of con-span bridge systems (Exhibits 2-7 and 2-8 in the 2006 DEIR/DEIS) as natural substrate span crossings over Morrison Creek. Rancho Cordova Parkway and Americanos Boulevard would cross Morrison Creek with a clear span of the delineated wetlands within the channel bank, so no construction would occur within the channel and no fill or modification of the channel would be required.</p> <p>GIS analysis of a LiDAR-derived topographic model (Appendix Q) and wetland delineation data were used to determine the watershed-to-wetland ratio (WWR) for the wetlands within the preserve. It was found that the proposed configuration of the preserve conserves almost 100% of the original watershed area and would not negatively affect the hydrologic function of the vernal pools. GIS analysis calculated the mean watershed ratio of existing vernal pools in the preserve at 7.14:1. This WWR would be maintained for all existing vernal pools, except that the WWR of one small pool (0.053 acre) would be reduced to 6.62:1. The adverse effect on this vernal pool should not be considered significant because pools of this size class require a WWR of only 3.26:1 to maintain functionality.</p> <p>To minimize indirect effects on water quality and wetland hydrology, the project applicant(s) of each project phase shall include drainage plans in their improvement plans and shall submit the drainage plans to the City Public Works Department for review and approval. Before approval of these improvement plans, the project applicant(s) for all project phases shall commit to implement all measures in their drainage plans to avoid and minimize erosion and runoff into Morrison Creek and all wetlands that would remain on-site. Appropriate runoff controls such as berms, storm gates, detention basins, overflow collection areas, filtration systems, and sediment traps shall be implemented to control siltation and the potential discharge of pollutants. For runoff during construction, see Section 3.4, “Drainage, Hydrology, and Water Quality,” of the 2006 DEIR/DEIS for a further discussion of the NPDES (Stormwater Pollution Prevention Plan).</p> <p>The project shall result in no net change to peak flows into Morrison Creek and associated tributaries. The project applicant(s) shall establish a baseline of conditions for drainage on-site. The baseline-flow conditions shall be established for 2-, 5-, 10-, and 20-year storm events. These baseline conditions shall be used</p>					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>to develop monitoring standards for the stormwater system on the project site. The baseline conditions, monitoring standards, and a monitoring program shall be submitted to USACE and the City for their approval. The engineered channel and detention basins shall be designed and constructed to ensure that the performance standards, which are described in Section 3.4, "Drainage, Hydrology, and Water Quality," of the 2006 DEIR/DEIS are met. The discharge site into Morrison Creek and associated tributaries shall be monitored to ensure that preproject conditions are being met. Stormwater runoff from Rancho Cordova Parkway would be discharged out of the wetland preserve to the north and south, and runoff from the central portion of the road would drain into a water quality treatment swale before being discharged into the wetland preserve (Exhibit 3.10-4). Runoff from Americanos Boulevard would be directed into a water quality treatment basin before being discharged into Morrison Creek (Exhibit 3.10-5). The water quality swale and treatment basins would be designed according to the Stormwater and Water Quality Design Manual for the Sacramento and South Placer Regions (Sacramento Stormwater Quality Partnership 2007) and shall meet the performance standards described in Section 3.4, "Drainage, Hydrology, and Water Quality," of the 2006 DEIR/DEIS. Corrective measures shall be implemented as necessary. The mitigation measures will be satisfied when the monitoring standards are met for 5 consecutive years without undertaking corrective measures to meet the performance standard.</p> <p>Timing: Before approval of improvement and drainage plans, and on an ongoing basis throughout and after project construction, as required for all project phases.</p> <p>Enforcement: U.S. Army Corps of Engineers, Sacramento District; and City of Rancho Cordova Public Works and Planning Departments.</p> <p>NP: No mitigation measures are required.</p>					
Impact 3.10-2: Loss and Degradation of Sensitive Natural Communities.	Direct & Indirect LTS	Direct & Indirect LTS	Direct & Indirect LTS	Direct & Indirect LTS	No Direct, No Indirect
<p>PP, HD, IM: Mitigation Measure 3.10-2a: Secure and Implement Section 1602 Streambed Alteration Agreement. A Section 1602 streambed alteration agreement from DFG will be required for construction affecting the bed and bank of Morrison Creek. As a condition of issuance of the streambed alteration agreement, the project applicant(s) for all project phases shall prepare a habitat MMP. The draft wetland MMP shall address impacts on the stream channel of Morrison Creek and shall include mitigation of impacts on riparian habitats to the satisfaction of DFG, subject to limitations on its authority set forth in Fish and Game Code Section 1600 et seq. The MMP shall include performance standards and success criteria to ensure that mitigation habitat would be successfully maintained.</p> <p>Any conditions of issuance of the streambed alteration agreement shall be implemented as part of project construction activities that adversely affect the bed and bank and current and historic riparian habitat associated with Morrison Creek that is within the area subject to DFG jurisdiction. The agreement shall be executed by the project applicant(s) and DFG before the approval of any grading or improvement plans or any construction activities in any project phase that could potentially affect the bed and bank of Morrison Creek and its associated current and historic riparian habitat.</p> <p>Timing: Before the approval of grading or improvement plans or any construction activities (including clearing and grubbing) that affect the bed and bank or current and historic riparian habitat associated with Morrison Creek.</p> <p>Enforcement: California Department of Fish and Game.</p> <p>NF: No mitigation measures are required because the No Federal Action Alternative would not result in alteration to the bed or bank of Morrison Creek. Therefore, a streambed alteration agreement from DFG would not be needed as it would under the action alternatives.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>PP, HD, IM: Mitigation Measure 3.10-2b: Preserve, Restore, or Create Riparian Habitat at Satisfactory Ratio to Fulfill Local Planning Framework Requirements. Goal NR.1, Policy NR 1.9 of the City General Plan calls for the protection and preservation of the diverse wildlife and plant habitats in Rancho Cordova and incorporation of “large interconnected wooded open space corridors in new development areas to provide movement corridors, and nesting sites for migratory songbirds and raptors.” Portions of the on-site riparian habitat such as the 57 acres of cottonwood willow riparian woodland and 4 acres of willow scrub have been determined to provide important habitat for wildlife, both at present and in the long term, because of existing conditions that support the perpetuation of these habitats. To implement Goal NR.1, a habitat MMP shall be developed and implemented to replace the 57 acres of cottonwood willow riparian woodland and 4 acres of willow scrub at no-net-loss acreage to preserve the overall habitat functions and values. Elements of the habitat MMP may include habitat preservation on-site, enhancement of on-site riparian habitat types, or enhancement or protection of habitat off-site. The specific ratios of habitat lost to habitat created shall be determined by the City in consultation with DFG as a trustee agency protecting the wildlife resources of the state. The ratios shall be consistent with the City’s policy and shall be adequate to protect and preserve the diverse resources in the City.</p> <p>Any conditions of issuance of the riparian MMP shall be implemented as part of project construction activities that adversely affect riparian habitat. The riparian habitat MMP shall be developed by the project applicant(s) and submitted to the City before the approval of any grading or improvement plans or any construction activities in any project phase that could potentially affect the cottonwood willow riparian woodland and willow scrub on-site. The cottonwood–willow riparian forest habitat and willow woodland shall be either preserved or replaced on- or off-site on a no-net-loss basis because it provides functioning riparian habitat that is self-sustaining at the present time. If preservation of this on-site habitat type is chosen, the hydrology that supports this habitat must also be preserved to ensure the long-term viability of this habitat type.</p> <p>The remainder of the riparian habitat on the project site consists mostly of old senescent trees and shrubs and does not appear to be regenerating. It is likely that portions of these communities would not persist at the site under the current environmental conditions even without project implementation. Because of the poor quality of the majority of the riparian habitat on the project site, the project mitigation for this riparian habitat shall be limited to the replacement and/or restoration of its current function and value (which consists of nesting and foraging habitat for raptors and other birds, as well as foraging habitat and shelter for numerous common wildlife species) as determined acceptable to the City in consultation with DFG as a trustee agency.</p> <p>Timing: Before the approval of grading or improvement plans or any construction activities and before removal of any riparian vegetation as required for any project phase.</p> <p>Enforcement: City of Rancho Cordova Planning Department in consultation with California Department of Fish and Game.</p> <p>NF: No mitigation measures are required because the No Federal Action Alternative would not result in adverse effects on riparian habitat in addition to those habitats protected and addressed under City policy.</p> <p>NP: No mitigation measures are required.</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.10-3: Loss of Oak Woodland and Individual Oak Trees.</p> <p>PP, HD, IM, NF: Mitigation Measure 3.10-3: Perform Tree Survey and Avoid or Replace Native Oak Trees and Other Native Trees Scattered Throughout the Project Site. Before the approval of any development in areas identified to contain trees, the City shall require that a determinate survey of tree species and size be performed. If any native oaks or other native trees of 6 inches or greater dbh, multitrunk native oaks or native trees of 10 inches or greater dbh, or nonnative trees of 18 inches or greater dbh that have been determined by a qualified professional to be in good health are found to exist in the development area, such trees shall be avoided if feasible. If such trees cannot feasibly be avoided, the project applicant(s) for all project phases containing trees shall implement one of the following measures:</p> <ul style="list-style-type: none"> ▶ All such trees that will be removed or otherwise damaged by project implementation shall be replaced at an inch-for-inch ratio. A replacement tree planting plan shall be prepared by a qualified professional or licensed landscape architect and shall be submitted to the City for approval before removal of trees; OR ▶ The project applicant(s) shall submit a mitigation plan that provides for complete mitigation of the removal of such trees in coordination with the City by a method comparable to an inch-by-inch replacement. The mitigation plan shall be subject to City approval. ▶ The tree planting or mitigation plan shall include monitoring requirements and success criteria, as determined by a qualified professional, to ensure that replacement trees survive to maturity and can be reasonably expected to persist for the normal life span of the particular species being monitored. Monitoring of replacement trees shall continue for a period of five years following planting and trees that do not survive or meet the success criteria shall be replaced. <p>Loss of trees mitigated through implementation of mitigation measures associated with riparian habitat impacts shall not be subject to this mitigation measure. If the City adopts a tree preservation ordinance at any time in the future, any future development activities shall be subject to that ordinance instead.</p> <p>Timing: Before the approval of any development in any project phase that contains areas that have been identified to contain trees.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>	<p>Direct & S. No indirect</p>	<p>Direct & S. No indirect</p>	<p>Direct & S. No indirect</p>	<p>Direct & S. No indirect</p>	<p>No Direct, No Indirect</p>
<p>Impact 3.10-4: Loss and Degradation of Habitat for Special-Status Wildlife.</p> <p>PP, HD, IM: Mitigation Measure 3.10-4a: Secure Take Authorization for Federally Listed Vernal Pool Invertebrates and Implement Permit Conditions. No project construction shall proceed in areas supporting potential habitat for federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS), until a BO has been issued by USFWS and the project applicant(s) have abided by conditions in the BO (including conservation and minimization measures) intended to be completed before on-site construction. Conservation and minimization measures shall include preparation of supporting documentation describing methods to protect existing vernal pools during and after project construction, a detailed monitoring plan, and reporting requirements.</p>	<p>Direct & Indirect S</p>	<p>Direct & Indirect S</p>	<p>Direct & Indirect S</p>	<p>Indirect S</p>	<p>No Direct, No Indirect</p>

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>A revised draft wetland MMP was developed by ECORP Consulting in September 2007 <u>June 2009</u> and is the applicant's proposed plan for addressing project impacts on habitats that potentially support federally listed vernal pool invertebrates. The draft MMP, included in Appendix Q to this document, is subject to review and approval by the appropriate regulatory agencies. Project implementation would result in the fill of 33.9 acres of habitat that could potentially support federally listed vernal pool invertebrates. This habitat consists of 17.5 acres of vernal pools, 4.2 acres of seasonal wetland swale, and 12.2 acres of seasonal wetlands. Indirect impacts on an additional 2.2 acres of vernal pools would also result from project implementation.</p> <p>Proposed mitigation in the draft MMP includes a combination of on-site preservation and compensatory mitigation (i.e., creation of vernal pools), as well as off-site mitigation through purchase of a 160-acre property, known as the Cook Property, and credit purchase in the Clay Station Mitigation Bank. The Cook Property mitigation proposal would preserve 21.7 acres of existing wetland habitat, including 2.7 acres of vernal pools, 2.6 acres of seasonal wetland swale, and 9.9 acres of seasonal wetland within the Mather Core Recovery Area that could potentially support federally listed branchiopods. Surveys in the vicinity of the Cook Property have identified vernal pool fairy shrimp and vernal pool tadpole shrimp, and the property is contiguous with other conservation properties that support vernal pool habitat. The Clay Station Mitigation Bank would provide compensatory mitigation in the form of 13 <u>16.7</u> acres of created vernal pool habitat that has been monitored for approximately 10 years met success criteria and currently supports both vernal pool fairy shrimp and vernal pool tadpole shrimp. Proposed on-site mitigation consists of designation of a 507-acre wetland preserve in the southern portion of the project site. A total of 20.4 acres of existing vernal pools would be retained in the proposed preserve and an additional 17.9 <u>13.4</u> acres would be restored and created in the preserve under the proposed MMP. The proposed preserve also contains 2.5 acres of seasonal wetland swale, 3.3 acres of seasonal wetland, 0.6 acre of pond, and 1.9 acres of ephemeral drainage. All of these features, as well as that portion of Morrison Creek that is within the 507-acre wetland preserve, would be preserved. In addition, the proposed draft MMP proposes creation of 20.8 <u>16.9</u> acres of seasonal wetlands within the drainage parkways <u>open space corridors</u> that would be developed for the project.</p> <p>In summary, the project would directly or indirectly affect 36.1 acres of potential vernal pool branchiopod habitat; the proposed MMP would preserve 41.4 acres of potential habitat and would create 51.6 <u>47.8</u> acres of potential habitat. This would result in a preservation ratio of 1.15:1 and a compensatory mitigation ratio of 1.43:1 <u>1.32:1</u>, which would result in no net loss of vernal pool or seasonal wetland habitat that could potentially support federally listed vernal pool invertebrates. The details of the MMP are still being developed and reviewed by USACE, and the September 2007 <u>June 2009</u> draft is not the final, approved version.</p> <p>The project applicant(s) shall complete and implement a habitat MMP that will result in no net loss of acreage, function, and value of affected vernal pool habitat. The final habitat MMP shall be consistent with guidance provided in Programmatic Formal Endangered Species Act Consultation on Issuance of 404 Permits for Projects with Relatively Small Effects on Listed Vernal Pool Crustaceans within the Jurisdiction of the Sacramento Field Office, California (USFWS 1996) and the SSCHCP (if adopted) or shall provide an alternative approach that is acceptable to the City, USACE, and USFWS and accomplishes no net loss of habitat.</p> <p>The project applicant(s) for all project phases shall ensure that there is sufficient upland habitat within the target areas for creation and restoration of vernal pools and vernal pool complexes to provide ecosystem health. A watershed analysis of the hydrologic function of the wetland preserve was conducted by ECORP Consulting on behalf of the project applicant(s) (Appendix Q). GIS analysis of a hydrologic model created from LiDAR-derived topography and wetland delineation data was used to determine the minimum watershed area required to support hydrologic function of the wetlands within the preserve. It was found that the proposed configuration of the preserve would conserve almost 100% of the original watershed area and would not negatively affect the hydrologic function of existing vernal pools. The land used to satisfy this mitigation measure shall be protected through a conservation easement acceptable to USACE, the City, and USFWS.</p> <p>The project applicant(s) for all project phases shall identify the extent of indirectly affected vernal pool and seasonal wetland habitat, either by identifying all such habitat within 250 feet of project construction activities or by providing an alternative technical evaluation. If a lesser distance is pursued, this distance shall be</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>approved by USFWS. The project applicant(s) shall preserve acreage of vernal pool habitat for each wetted acre of any indirectly affected vernal pool habitat at a ratio approved by USFWS at the conclusion of the Section 7 consultation. This mitigation shall occur before the approval of any grading or improvement plans for any project phase that would allow work within 250 feet of such habitat, and before any ground-disturbing activity within 250 feet of the habitat. The project applicant(s) will not be required to complete this mitigation measure for direct or indirect impacts that have already been mitigated to the satisfaction of USFWS through another BO or mitigation plan.</p> <p>A standard set of BMPs shall be applied to construction occurring in areas within 250 feet of off-site vernal pool habitat, or within any lesser distance deemed adequate by a qualified biologist (with approval from USFWS) to constitute a sufficient buffer from such habitat. Refer to Section 3.4, "Drainage, Hydrology, and Water Quality," of the 2006 DEIR/DEIS for the details of BMPs to be implemented.</p> <p>Timing: Before the approval of any grading or improvement plans, before any ground-disturbing activities within 250 feet of said habitat, and on an ongoing basis throughout construction as applicable for all project phases as required by the mitigation plan, BO, and/or BMPs.</p> <p>Enforcement: U.S. Army Corps of Engineers, Sacramento District; U.S. Fish and Wildlife Service; and City of Rancho Cordova Planning Department.</p> <p>NF: The project applicant(s) for all project phases shall obtain an incidental take permit under Section 10(a) of ESA. No project construction shall proceed in areas supporting potential habitat for federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS), until a BO has been issued by USFWS and the project applicant(s) have abided by conditions in the BO (including all conservation and minimization measures). Conservation and minimization measures are likely to include preparation of supporting documentation describing methods to protect existing vernal pools during and after project construction.</p> <p>Under the No Federal Action Alternative, interagency consultation under Section 7 of ESA would not occur; therefore, the project applicant(s) would be required to develop a habitat conservation plan to mitigate impacts on federally listed vernal pool invertebrates, or participate in the SSCHCP, if available. The project applicant(s) shall complete and implement, or participate in, a habitat conservation plan that shall compensate for the loss of acreage, function, and value of affected vernal pool habitat. The habitat conservation plan shall be consistent with the goals of the <i>Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon</i> (USFWS 2005) and must be approved by USFWS.</p> <p>The project applicant(s) for all project phases shall ensure that there is sufficient upland habitat within the target areas for creation and restoration of vernal pools and vernal pool complexes to provide ecosystem health. The land used to satisfy this mitigation measure shall be protected through a fee title or conservation easement acceptable to the City and USFWS.</p> <p>The project applicant(s) for all project phases shall identify the extent of indirectly affected vernal pool and seasonal wetland habitat, either by identifying all such habitat within 250 feet of project construction activities or by providing an alternative technical evaluation in support of a lesser indirect impact distance. If a lesser distance is pursued, this distance shall be approved by USFWS. The project applicant(s) shall preserve 2 wetted acres of vernal pool habitat for each wetted acre of any indirectly affected vernal pool habitat. This mitigation shall occur before the approval of any grading or improvement plans for any project phase that would allow work within 250 feet of such habitat, and before any ground-disturbing activity within 250 feet of the habitat. The project applicant(s) will not be required to complete this mitigation measure for direct or indirect impacts that have already been mitigated to the satisfaction of USFWS through another BO or mitigation plan.</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>A standard set of BMPs shall be applied to construction occurring in areas within 250 feet of off-site vernal pool habitat, or within any lesser distance deemed adequate by a qualified biologist (with approval from USFWS) to constitute a sufficient buffer from such habitat. Refer to Section 3.4, “Drainage, Hydrology, and Water Quality,” of the 2006 DEIR/DEIS for the details of BMPs to be implemented.</p> <p>Timing: Before the approval of any grading or improvement plans, before any ground-disturbing activities within 250 feet of said habitat, and on an ongoing basis throughout construction as applicable for all project phases as required by the habitat conservation plan, BO, and/or BMPs.</p> <p>Enforcement: U.S. Fish and Wildlife Service and City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>PP, HD, IM: Mitigation Measure: Implement Mitigation Measures 3.10-1a and 3.10-1b. Mitigation Measures 3.10-1a and 3.10-1b are discussed above under Impact 3.10-1.</p> <p>NF, NP: No mitigation measures are required.</p>					
<p>PP, HD, IM: Mitigation Measure 3.10-4b: Obtain Incidental Take Permit for Impacts on Valley Elderberry Longhorn Beetle. No project construction shall proceed in areas containing VELB habitat (i.e., elderberry shrubs) until a BO has been issued by USFWS, and the project applicant(s) for all project phases have abided by all pertinent conditions in the BO relating to the proposed construction, including conservation and minimization measures, intended to be completed before on-site construction. Conservation and minimization measures are likely to include preparation of supporting documentation that describes methods for relocation of <u>relocating and maintaining existing shrubs and maintaining existing shrubs and other associated vegetation in the preserve.</u></p> <p>Relocation of existing elderberry shrubs and planting of new elderberry seedlings shall be implemented on a no-net-loss basis. Detailed information on monitoring success of relocated and planted shrubs and measures to compensate (should success criteria not be met) would also likely be required in the BO. Ratios for mitigation of VELB habitat will ultimately be determined through the ESA Section 7 consultation process with USFWS, but shall be a minimum of “no net loss.” Although Section 7 consultation for the project is ongoing, a draft VELB mitigation plan has been developed by ECORP Consulting (Appendix R). Because the proposed MMP is in draft form and a final BO has not been issued by USFWS, the proposed MMP may be modified in the future. Details from this draft plan are provided under the impact discussion above. <u>Section 7 consultation for the project is ongoing, and a VELB mitigation plan is being developed by ECORP Consulting. The final VELB mitigation plan may include creation of two on-site preserve areas, transplanting of all existing shrubs to the on-site preserve areas, as well as planting of 2,997 elderberry seedlings in the proposed preserve areas and drainage parkways open space corridors, and purchase of 154.2 credits in a USFWS-approved mitigation bank. Based on the current (dated) knowledge of the number of shrubs on-site and the latest VELB preservation guidelines, it is expected that approximately 3,088 seedlings would need to be planted over an area of approximately 25 acres to fulfill VELB mitigation requirements and no net loss of habitat.</u> Implementation of this <u>the final approved</u> plan would satisfy mitigation requirements for the removal of elderberry savanna, a sensitive habitat as identified by DFG, as well as single elderberry shrubs. A copy of the USFWS-approved mitigation plan shall be submitted to the City before the approval of any grading or improvement plans or any ground-disturbing activities within 100 feet of VELB habitat for all project phases.</p> <p>Should delisting of VELB occur, a mitigation plan that would compensate for the removal of elderberry savanna, a sensitive habitat as identified by DFG, would still be required. The mitigation plan shall be submitted to and approved by DFG and the City before the approval of any grading or improvement plans or any ground-disturbing activities that would affect elderberry savanna for all project phases.</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Timing: Before the approval of any grading or improvement plans or any ground-disturbing activity within 100 feet of VELB habitat as applicable for all project phases, and on an ongoing basis as required by the mitigation plan and/or BO.</p> <p>Enforcement: U.S. Army Corps of Engineers, Sacramento District; U.S. Fish and Wildlife Service; California Department of Fish and Game (if VELB delisted); and City of Rancho Cordova Planning Department.</p> <p>NF: As long as VELB remains a species protected under ESA, the project applicant(s) shall obtain an incidental take permit under Section 10(a) of ESA for VELB. No project construction shall proceed in areas containing VELB habitat (i.e., elderberry shrubs) until a BO has been issued by USFWS, and the project applicant(s) for all project phases have abided by all pertinent conditions in the BO relating to the proposed construction, including all conservation and minimization measures. Conservation and minimization measures are likely to include preparation of supporting documentation that describes methods for relocation of existing shrubs and maintaining existing shrubs and other vegetation in the preserve.</p> <p>Under the No Federal Action Alternative, interagency consultation under Section 7 of ESA would not occur; therefore, the project applicant(s) would be required to develop a habitat conservation plan to mitigate impacts on VELB, or participate in the SSCHCP, if available. If participation in the SSCHCP is not available or not chosen, the project applicant(s) shall complete and implement, or participate in, a habitat conservation plan that will compensate for the loss of VELB habitat. Relocation of existing elderberry shrubs and planting of new elderberry seedlings shall be implemented on a no-net-loss basis. Detailed information on monitoring success of relocated and planted shrubs and measures to compensate (should success criteria not be met) would also likely be required in the BO. Ratios for mitigation of VELB habitat will ultimately be determined through the ESA Section 10(a) consultation process with USFWS, but shall be a minimum of “no net loss.” Based on the current (dated) knowledge of the number of shrubs on-site and the latest VELB preservation guidelines, it is expected that approximately 3,088 seedlings would need to be planted over an area of approximately 25 acres to fulfill VELB mitigation requirements and no net loss of habitat.</p> <p>Should delisting of VELB occur, a mitigation plan that would compensate for the removal of elderberry savanna, a sensitive habitat as identified by DFG, would still be required. The mitigation plan shall be submitted to and approved by DFG and the City before the approval of any grading or improvement plans or any ground-disturbing activities that would affect elderberry savanna for all project phases.</p> <p>Timing: Before the approval of any grading or improvement plans or any ground-disturbing activity within 100 feet of VELB habitat as applicable for all project phases, and on an ongoing basis as required by the habitat conservation plan and/or BO.</p> <p>Enforcement: California Department of Fish and Game (if VELB delisted), U.S. Fish and Wildlife Service, and City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>PP, HD, IM, NF: Mitigation Measure 3.10-4c: Conduct Preconstruction Surveys for Nesting Raptors and, if Found, Establish Appropriate Buffers. To mitigate impacts on Swainson’s hawk and other raptors (including burrowing owl) for all project phases, the project applicant(s) shall retain a qualified biologist to conduct preconstruction surveys and to identify active nests on and within 0.5 mile of the project site and active burrows on the project site. The surveys shall be conducted before the approval of grading and/or improvement plans (as applicable) and no less than 14 days and no more than 30 days before the beginning of construction for all project phases. To the extent feasible, guidelines provided in <i>Recommended Timing and Methodology for Swainson’s Hawk Nesting Surveys in the Central Valley</i> (Swainson’s Hawk Technical Advisory Committee 2000) shall be followed. If no nests are found, no further mitigation is required.</p>					

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	PP	HD	IM	NF	NP
<p>If active nests are found, impacts on nesting Swainson’s hawks and other raptors shall be avoided by establishment of appropriate buffers around the nests. No project activity shall commence within the buffer area until a qualified biologist confirms that any young have fledged and the nest is no longer active. DFG guidelines recommend implementation of 0.25- or 0.5-mile buffers, but the size of the buffer may be adjusted if a qualified biologist and the City, in consultation with DFG, determine that such an adjustment would not be likely to adversely affect the nest. Monitoring of the nest by a qualified biologist during and after construction activities will be required if the activity has potential to adversely affect the nest.</p> <p>If active burrows are found, a mitigation plan shall be submitted to the City for review and approval before any ground-disturbing activities. The City shall consult with DFG. The mitigation plan may consist of installation of one-way doors on all burrows to allow owls to exit, but not reenter, and construction of artificial burrows within the project vicinity, as needed. If active burrows contain eggs and/or young, no construction shall occur within 50 feet of the burrow until young have fledged. Once it is confirmed that there are no owls inside burrows, these burrows may be collapsed.</p> <p>Timing: Before the approval of grading and improvement plans, before any ground-disturbing activities, and during project construction as applicable for all project phases.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>PP, HD, IM, NF: Mitigation Measure 3.10-4d: Prepare and Implement a Swainson’s Hawk Mitigation Plan. The project applicant(s) for all project phases shall implement one of the following measures:</p> <ul style="list-style-type: none"> ▶ Before the approval of grading and improvement plans or before any ground-disturbing activities, whichever occurs first, the project applicant(s) shall preserve, to the satisfaction of the City, suitable Swainson’s hawk foraging habitat to ensure 1:1 mitigation of habitat value for Swainson’s hawk foraging habitat lost as a result of the project, as determined by the City after consultation with DFG and a qualified biologist. <p>The 1:1 habitat value shall be based on Swainson’s hawk nesting distribution and an assessment of habitat quality, availability, and use within the City’s planning area. If specific data for Rancho Cordova’s Swainson’s hawk habitat are not available at the time that this mitigation measure is being implemented, the mitigation ratio shall be consistent with the 1994 DFG Swainson’s Hawk Guidelines included in the Staff Report Regarding Mitigation for Impacts to Swainson’s Hawks (<i>Buteo swainsoni</i>) in the Central Valley of California. Such mitigation shall be accomplished through either the transfer of fee title or perpetual conservation easement. The mitigation land shall be located within the known foraging area and within Sacramento County. The City, after consultation with DFG, will determine the appropriateness of the mitigation land.</p> <p>Before approval of such proposed mitigation, the City shall consult with DFG regarding the appropriateness of the mitigation. If mitigation is accomplished through conservation easement, then such an easement shall ensure the continued management of the land to maintain Swainson’s hawk foraging values, including but not limited to ongoing agricultural uses and the maintenance of all existing water rights associated with the land. The conservation easement shall be recordable and shall prohibit any activity that substantially impairs or diminishes the land’s capacity as suitable Swainson’s hawk habitat.</p> <p>The project applicant(s) shall transfer said Swainson’s hawk mitigation land, through either conservation easement or fee title, to a third-party, nonprofit conservation organization (Conservation Operator), with the City and DFG named as third-party beneficiaries. The Conservation Operator shall be a qualified conservation easement land manager that manages land as its primary function. Additionally, the Conservation Operator shall be a tax-exempt nonprofit</p>					

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Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>conservation organization that meets the criteria of Civil Code Section 815.3(a) and shall be selected or approved by the City, after consultation with DFG. The City, after consultation with DFG and the Conservation Operator, shall approve the content and form of the conservation easement. The City, DFG, and the Conservation Operator 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.</p> <p>The project applicant(s), after consultation with the City, DFG, and the Conservation Operator, shall establish an endowment or some other financial mechanism that is sufficient to fund in perpetuity the operation, maintenance, management, and enforcement of the conservation easement. If an endowment is used, either the endowment funds shall be submitted to the City to be distributed to an appropriate third-party nonprofit conservation agency, or they shall be submitted directly to the third-party nonprofit conservation agency in exchange for an agreement to manage and maintain the lands in perpetuity. The Conservation Operator shall not sell, lease, or transfer any interest of any conservation easement or mitigation land it acquires without prior written approval of the City and DFG.</p> <p>If the Conservation Operator ceases to exist, the duty to hold, administer, manage, maintain, and enforce the interest shall be transferred to another entity acceptable to the City and DFG. The City Planning Department shall ensure that mitigation habitat is properly established and is functioning as habitat by conducting regular monitoring of the mitigation site(s) for the first 10 years after establishment of the easement. OR</p> <ul style="list-style-type: none"> ▶ The project applicant(s) may participate in a future City Swainson’s Hawk Foraging Habitat Ordinance (once adopted) as an alternative to the measure above. OR ▶ The project applicant(s) may participate in a future habitat conservation plan (once adopted) as an alternative to the above measures. <p>Timing: Before the approval of grading, improvement, or construction plans and before any ground-disturbing activity in any project development phase that would affect Swainson’s hawk foraging habitat.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					
<p>PP, HD, IM, NF: Mitigation Measure: Implement Mitigation Measures 3.10-1a, 3.10-1b, and 3.10-4a to Reduce Impacts on Western Spadefoot Toad. Measures 3.10-1a and 3.10-1b are discussed above under Impact 3.10-1. Mitigation Measure 3.10-4a was discussed previously under this impact (Impact 3.10-4). These measures would ensure no net loss of western spadefoot habitat.</p> <p>Timing: Before the approval of grading, improvement, or construction plans and before any ground-disturbing activity in any project development phase that contains vernal pools or other seasonal wetland habitats.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NP: No mitigation measures are required.</p>					

**Table 1-2
Summary of the Program and Project Level (Phase 1) Impacts and Mitigation Measures
of the Proposed Project and Alternatives under Consideration, as Identified in the 2008 RDEIR/SDEIS**

Impact Mitigation	Alternatives				
	PP	HD	IM	NF	NP
<p>Impact 3.10-5: Loss and Degradation of Special-Status Plants and Habitat for Potential Special-Status Plants.</p> <p>PP, HD, IM: Mitigation Measure 3.10-5: Incorporate Measures to Protect Greene’s Legenere in the Mitigation Monitoring Plan. Direct impacts on the population of Greene’s legenere located within the wetland preserve shall be avoided to the maximum extent feasible.</p> <p>An MMP for Greene’s legenere is being developed on behalf of the project applicant(s) by ECORP Consulting. Before the approval of grading plans or any ground-breaking activity within 250 feet of any Greene’s legenere population, the mitigation plan shall be submitted to the City for review and approval. The plan shall be submitted concurrently to DFG and USFWS for review and comment, and the City may consult with these entities before approval of the plan. The plan is required to maintain viable plant populations on-site and shall include avoidance measures for the existing population to be retained and mitigation measures for the populations to be directly affected. Possible avoidance measures include fencing of the population before construction and exclusion of project activities from the fenced-off areas, and construction monitoring by a qualified botanist to keep construction crews away from the population. Indirect impacts (i.e., changes in hydrology) shall be minimized by placing culverts to the vernal pool where this population occurs, if necessary. Possible mitigation for the two populations of Greene’s legenere that would be removed during construction of the drainage parkway includes the collection of seeds from the existing populations and inoculation of the collected seeds into existing or compensatory vernal pools within the wetland preserve.</p> <p>The mitigation plan proposes that the best option for the successful germination of seeds would be to inoculate existing pools that are similar in size and depth and hydration period, and with similar associated species as the pools that currently support Greene’s legenere. Mitigation for the populations of legenere proposed to be directly affected shall commence before the approval of any plans for, or any ground-breaking activities near, the locations of such legenere populations. Monitoring of the existing population of Greene’s legenere and the seeded populations shall be conducted in conjunction with monitoring of vernal pools <u>and shall continue</u> for a minimum period of 5 years, as specified in Mitigation Measure 3.10-1.</p> <p>Timing: Before the approval of grading or improvement plans or any ground-breaking activity within 250 feet of any Greene’s legenere population, including grubbing and clearing, for any project development phase. Ongoing monitoring shall occur for a minimum of 5 years following the completion of all construction activities.</p> <p>Enforcement: City of Rancho Cordova Planning Department.</p> <p>NF, NP: No mitigation measures are required.</p>	Direct S	Direct S	Direct PS	LTS	No Direct, No Indirect
<p>Impact 3.10-6: Cumulative Biological Resources Impacts.</p> <p>PP, HD, IM, NF, NP: Implementation of Mitigation Measures 3.10-3 and 3.10-5 would reduce the direct project-specific impacts on protected trees and special-status plants to a less-than-significant level. Implementation of Mitigation Measures 3.10-1a, 3.10-1b, 3.10-2, 3.10-4a, 3.10-4b, 3.10-4c, and 3.10-4d would reduce but not fully eliminate impacts on biological resources. Even with implementation of the proposed mitigation and regional enforcement of the USACE “no-net-loss” standard, the value of the region as it relates to the long-term viability of these resources would be substantially diminished. The Rio del Oro project would result in a cumulatively considerable incremental contribution to significant cumulative biological resources impacts, including the loss and degradation of sensitive habitats, habitat for special-status wildlife, and habitat for special-status plants; and loss/ displacement of special-status wildlife.</p>	SU	SU	SU	SU	No Direct, No Indirect

2 MINOR MODIFICATIONS TO THE PROPOSED PROJECT

2.1 INTRODUCTION

Since release of the 2006 DEIR/DEIS and 2008 RDEIR/SDEIS, the project applicants have continued to refine the features of the Proposed Project. As a result of these planning refinements, the Proposed Project has undergone minor modifications that are identified in the following discussion. These modifications would not substantially increase the intensity or severity of an impact or create a new significant impact, as discussed further below. Therefore, these minor modifications do not require recirculation of the EIR or a supplement to the EIS.

2.2 SUMMARY OF MODIFICATIONS TO THE PROJECT DESCRIPTION

2.2.1 LAND USE CHANGES

The Proposed Project's land use acreages have been revised as shown below.

Land Use	Acres	% of Total Acres	% of Total Units	Units
Residential				
Single Family	1,597	41.7%	69%	7,985
Medium Density	237	6.1%	16%	4,896
High Density	86	2.2%	15%	4,720
Subtotal	1,920	50%	100%	11,601
Village Services and Employment				
Village Commercial	20	0.5%		
Local Town Center	22	0.5%		
Regional Town Center	44	3.0%		
Business Professional	86	2.5%		
Industrial Park (MP)	282	7.4%		
Subtotal	524	13.9%		
Education				
High/Middle School	78	2.0%		
Middle School	20	0.5%		
Elementary School	54	1.4%		
Subtotal	152	3.9%		
Open Space & Public				
Community Park	107	2.8%		
Public/Quasi Public	9.5	0.3%		
Park	63	1.6%		
Storm Water Detention	39	1.0%		
Wetland Preserve	507	13.2%		
Drainage Parkway	143	3.7%		
Private Recreation	54	1.4%		
Open Space	12	0.3%		
Open Space/Preserve	24	0.6%		
Landscape Corridor	44	1.2%		
Greenbelt	50	1.3%		
Major Roads	183	4.8%		
Subtotal	1,235.5	32.2%		
Total	3,828.5	100%		11,601

Source: Data compiled by City of Rancho Cordova in 2009

Land Use	Acres	% of Total Acres	% of Total Units	Units
Residential				
Single Family	<u>1,518.5</u>	<u>39.7%</u>	<u>65%</u>	<u>7,593</u>
Medium Density	<u>256.0</u>	<u>6.7%</u>	<u>18%</u>	<u>2,048</u>
High Density	<u>98.0</u>	<u>2.6%</u>	<u>17%</u>	<u>1,960</u>
Subtotal	<u>1,872.5</u>	<u>49.0%</u>	100%	11,601
Village Services and Employment				
Village Commercial	20.0	0.5%		
Local Town Center	<u>20.0</u>	0.5%		
Regional Town Center	<u>113.0</u>	3.0%		
Business Professional	86.0	2.2%		
Industrial Park (MP)	<u>283.0</u>	7.4%		
Subtotal	<u>522.0</u>	<u>13.6%</u>		
Education				
High/Middle School	78	2.0%		
Middle School	20	0.5%		
Elementary School	54	1.4%		
Subtotal	152	3.9%		
Open Space & Public				
Community Park	107	2.8%		
Public/Quasi Public	<u>7.5</u>	<u>0.2%</u>		
Park	<u>67.5</u>	<u>1.8%</u>		
Storm Water Detention	39.0	1.0%		
Wetland Preserve	<u>510.0</u>	<u>13.3%</u>		
Drainage Parkway	<u>138.0</u>	<u>3.6%</u>		
Private Recreation	54.0	1.4%		
Open Space	12.0	0.3%		
Open Space/Preserve	<u>22.0</u>	0.6%		
Landscape Corridor	<u>82.0</u>	<u>2.1%</u>		
Greenbelt	<u>51.0</u>	1.3%		
Major Roads	<u>192.0</u>	<u>5.0%</u>		
Subtotal	<u>1,282.0</u>	<u>33.4%</u>		
Total	3,828.5	100%		11,601

Source: Data compiled by City of Rancho Cordova in 2009

The proposed changes shown in Table 2-2 are minor, and the total project acreage and number of dwelling units have not changed. These minor modifications fall within the range of environmental impacts evaluated in the 2006 DEIR/DEIS and the 2008 RDEIR/RDEIS; therefore, no changes to the analysis or the mitigation measures are required because these modifications would not substantially increase the intensity or severity of an impact or create a new significant impact.

2.2.2 CHANGES TO THE CITY OF RANCHO CORDOVA ENTITLEMENT PROCESS

The entitlements for the Rio del Oro project analyzed in the 2006 DEIR/DEIS included a specific plan, public facilities financing plan, public facilities infrastructure/phasing plan, Phase 1 tentative subdivision map for the portion of the site owned by Elliott Homes, and development agreement for a 3,828-acre mixed-use community east of Sunrise Boulevard between White Rock Road and Douglas Road. The development application was originally submitted to the County before City incorporation in 2003. Upon incorporation, the City took over responsibility for the evaluation of and action on the Proposed Project.

In summer 2008, the City Council held two meetings to consider several important project issues related to financing, phasing, and project infrastructure. In spring 2009, the applicant team and the City agreed to pursue the concept of phasing project entitlements for the project. The goal is to limit the request for approval at this time to the adoption of the Rio del Oro Specific Plan (Specific Plan) (with corresponding environmental analysis and development agreement). Entitlements to implement the project, such as subdivision maps and details of financing, phasing, and overall map conditions, would be part of a subsequent entitlement process. Details of the current entitlement request are provided below.

The changes to the entitlement process are applicable to the City's entitlement process only. These entitlement changes do not change the federal NEPA and permitting process. Appropriate changes to the Executive Summary, Chapter 2, "Alternatives," and appropriate resource sections of the 2006 DEIR/DEIS reflecting the changes to the entitlement process have been made as shown in Chapter 5, "Corrections and Revisions to the 2006 DEIR/DEIS and 2008 RDEIR/SDEIS" of this FEIR/FEIS.

CURRENT CITY ENTITLEMENTS BEING SOUGHT

California law allows cities and developers considerable flexibility to decide how to "package" the long list of development approvals necessary for most major planned developments. One method of processing development approvals is to combine all or almost all of the plans and permits required to plan, analyze, subdivide, and start building a project into a single large set of approvals that a city council considers at one time. However, with proper environmental analysis and by following the required procedures, several other communities around the state have at times found it useful to allow major developments to be packaged into two or more sequential rounds of development approvals. This multiphase or multitier approach has been followed in this region (e.g., in Sutter County, for the Sutter Pointe Specific Plan) and in other areas of the state.

The current proposal is to process the Rio del Oro Specific Plan in two separate phases or "tiers" of development approvals for each of the two property owners (i.e., Elliott Homes and GenCorp). Separate but concurrent Tier 1 entitlements for each of the property owners would include the Specific Plan (and corresponding amendment to the Aerojet Special Planning Area [SPA]), a Tier 1 development agreement, and certification of the EIR for the project. The Tier 1 development agreements would vest, to some extent, the Specific Plan and the City would consider future approval of project entitlements consistent with the land uses and other details in the Specific Plan.

Tier 1 entitlements would establish the zoning of the property, but would not allow for physical development of the site. The primary intent of the tiered entitlement process set forth in the GenCorp Tier 1 development agreement is to ensure, to the City's satisfaction, that the provisions of the Rio del Oro Specific Plan, the project's financing plan, and the phasing master plan are uniformly applied in the entire Specific Plan area, to both the

GenCorp and Elliott Homes properties. Critical to the Tier 2 entitlements is that the financing, phasing, and overall project conditions of approval would be determined and memorialized in the form of development agreements before or in conjunction with the maps and other entitlements associated with physical development of the site.

TIER 1 ENTITLEMENTS FOR THE RIO DEL ORO SPECIFIC PLAN PROJECT

Tier 1 project entitlements being sought separately but concurrently at this time by the two property owners consist of adoption of the Specific Plan, amendment to the existing Aerojet SPA, Tier 1 development agreements for the entire project, and certification of the EIR. Each entitlement is described in more detail below.

Adoption of the Rio del Oro Specific Plan

The Specific Plan establishes the land use plan (zoning map) and zoning regulations for development within the 3,828-acre project site. Consistent with state law, a specific plan can establish zoning regulations that are different and unique to the project site. The Specific Plan includes information about the project's objectives, its relationship to other City documents, setting and surroundings, land use and circulation, environmental resources, public utilities, public services, and implementation. Related plans in the appendices to the Specific Plan include the *Rio del Oro Development Standards and Design Guidelines* and the *On-Site Infrastructure Phasing Plan*.

Adoption of the Specific Plan with the first tier of approvals would establish and vest (through the development agreements) the zoning of the property, the land plan and corresponding development standards, circulation system, plan for services and utilities, preliminary on-site phasing, and plan for implementation and financing. Subsequent development would be subject to compliance with all provisions of the adopted Specific Plan. As described above, determination of additional project details (finance plan, phasing master plan, and overall project conditions of approval) would be required before formal subdivision and any physical development of the site may occur.

Amendment to the Aerojet Special Planning Area

In 1995, Sacramento County adopted the Aerojet SPA Ordinance, which included surface mining and use regulations for much of the Aerojet land holdings, including the Rio del Oro project site. Adoption of the Specific Plan requires a corresponding amendment to the Aerojet SPA to remove the 3,828-acre project site.

Development Agreements

As stated above, the current proposal is to process the Rio del Oro Specific Plan in two separate phases, or tiers, of development approvals for each of the two property owners. The Tier 1 entitlements include the Specific Plan and a Tier 1 development agreement for each of the two property owners. The terms of the Tier 1 development agreements would be nearly identical; one agreement would apply to Elliott Homes' property and the other would apply to GenCorp's property. GenCorp would have the vested right to proceed with development of its property in accordance with the Tier 1 entitlements. The Tier 1 entitlements would also commit the City to consider future approval or denial of Tier 2 and subsequent project entitlements consistent with the land uses and other standards and requirements set forth in the Tier 1 entitlements, including the Specific Plan. The Tier 1 development agreements would not guarantee approval of the Tier 2 entitlements or subsequent entitlements. In the Tier 1 development agreements, the City would agree that the Specific Plan is essentially the blueprint for the development of the project site and that the City and developers would both work toward the development it describes. The City would acknowledge that the Rio del Oro Specific Plan includes the land uses and approximate acreages for the project as shown and described in the Specific Plan. In the Tier 1 development agreements, both parties agree that the City would not firmly promise to approve development as described in the Specific Plan until all of the developers within the Specific Plan area agree to the financing plan, phasing master plan, and overall project conditions of approval.

TIER 2 ENTITLEMENTS FOR THE RIO DEL ORO SPECIFIC PLAN PROJECT

The City is not required to process the Tier 2 development agreements for GenCorp and Elliott Homes simultaneously. The project applicant that requests approval of its Tier 2 development agreement first would work with the City to prepare a single financing plan, phasing master plan, and set of master large-lot maps for the entire specific plan area. That applicant's development agreement would be approved at the same time as the plans and master large-lot maps. The City and property owners agree that before any Tier 2 entitlements are approved and before physical development would be allowed, including development under the Tier 2 development agreements, all of the developers within the Specific Plan area would agree to the financing plan, phasing master plan, and overall project conditions of approval. If Elliott Homes requests approval of its Tier 2 development agreement first, then the City may deny approval of the GenCorp Tier 2 development agreement and other Tier 2 entitlements for areas subject to the GenCorp Tier 1 development agreement unless GenCorp agrees to comply with the terms of the financing plan, phasing master plan, and master large-lot tentative map conditions of approval, as established by the City and Elliott Homes. The GenCorp Tier 2 development agreement would be approved at the same time as, but not before, the City approves the financing plan and phasing master plan for the entire Specific Plan area, and a large-lot tentative map for the GenCorp property (which would include the master conditions of approval to implement the Specific Plan, the financing plan, and the phasing master plan).

CHANGES TO MITIGATION MEASURES RELATED TO ENTITLEMENT CHANGES

As a result of the limited-entitlement approach, mitigation measures associated with this EIR/EIS have been modified to correspond to the project sequencing. Namely, the timing of Mitigation Measures 3.5-2, 3.5-3, 3.5-4, 3.6-1, 3.13-2a, 3.13-2c, 3.14-1, 3.14-6, and 3.14-7, and 3.16-5 has been revised and Impact/Mitigation Measure 3.14-4 has been removed (see Chapter 5, "Corrections to the DEIR/DEIS," for details). The EIR/EIS now analyzes more details than are currently included in the proposed Tier 1 entitlement. Certification of the EIR with additional project details does not constitute approval or entitlement of the more detailed project. Rather, certification of the EIR is a statement that compliance with the environmental process has occurred. Subsequent entitlements (Tier 2 entitlements) will be evaluated in accordance with CEQA to determine whether any additional environmental review is required at the time the Tier 2 entitlements are requested beyond what is evaluated in the Rio del Oro Specific Plan EIR/EIS. None of the modifications to the mitigation measures would create any new significant impact not previously disclosed.

2.2.3 TRAFFIC ANALYSIS FOR PROPOSED LAND USE PLAN CHANGES

From a trip generation perspective, the appropriate changes identified in Tables 2-1 and 2-2 were incorporated by Fehr & Peers Transportation Consultants into the Travel Demand Forecasting (TDF) model used for the impact assessment in the 2006 DEIR/DEIS. The results indicate that:

- ▶ the shift from Single Family to Medium and High Density Households reduces the trip generation characteristics for that use;
- ▶ the increase in Local Town Center, Regional Town Center, and Industrial Park increases trip generation characteristics for their respective land uses;
- ▶ the decrease in Public/Quasi Public use reduces the trip generation for that land use; and
- ▶ the other modifications have no tangible affect on trip generation.

Overall, the changes in the specific plan would result in a net decrease of approximately 900 daily trips (which equates to a reduction of approximately 0.4% of the daily traffic generated from the Rio del Oro Specific Plan project). To verify this, Fehr & Peers ran the TDF model used for the 2006 DEIR/DEIS to estimate how the shift in land use could affect traffic volumes around the specific plan area. Traffic volumes on adjacent roadways are

generally expected to decrease, although the model does show some minor increases on some segments (likely because of the location of the land use changes or simply noise associated with a multicounty TDF model). The changes in traffic volumes on roadways in the specific plan area generally vary by less than 1% of the roadway segment's capacity and are not expected to result in any new impacts not previously identified, or any changes in the significance conclusions or mitigation measures already identified in the 2006 DEIR/DEIS.

2.2.4 CHANGES TO PROPOSED PHASING

Since the time the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS were prepared and circulated for public review, the applicants' proposed phasing plan has changed, as shown in FEIR/FEIS Exhibit 2-1. The proposed Phase 1 boundary is larger than, and no longer coincides with, the Phase 1 area that was evaluated at a project level in the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS. However, as discussed in Section 2.2.2 above, the requested project entitlements have also changed, and the project applicants are no longer seeking approval of specific development applications for Phase 1 or any other portion of the project site at this time. When specific development applications are received, the City, as CEQA lead agency, will review the areas evaluated in this EIR/EIS at a program level and the areas evaluated at a project level, as shown in Exhibits 2-4 and 2-14 of the 2006 DEIR/DEIS, and at that time will determine what, if any, additional environmental analysis may be necessary. To clarify for decision makers and to the public exactly what area of the project site was evaluated at a project level as "Phase 1" in this EIR/EIS, Exhibit 2-14 from the 2006 DEIR/DEIS is not being replaced with Exhibit 2-1; instead, FEIR/FEIS Exhibit 2-1 is included here for informational purposes only. The changes to the proposed phasing do not change the federal NEPA or permitting processes.

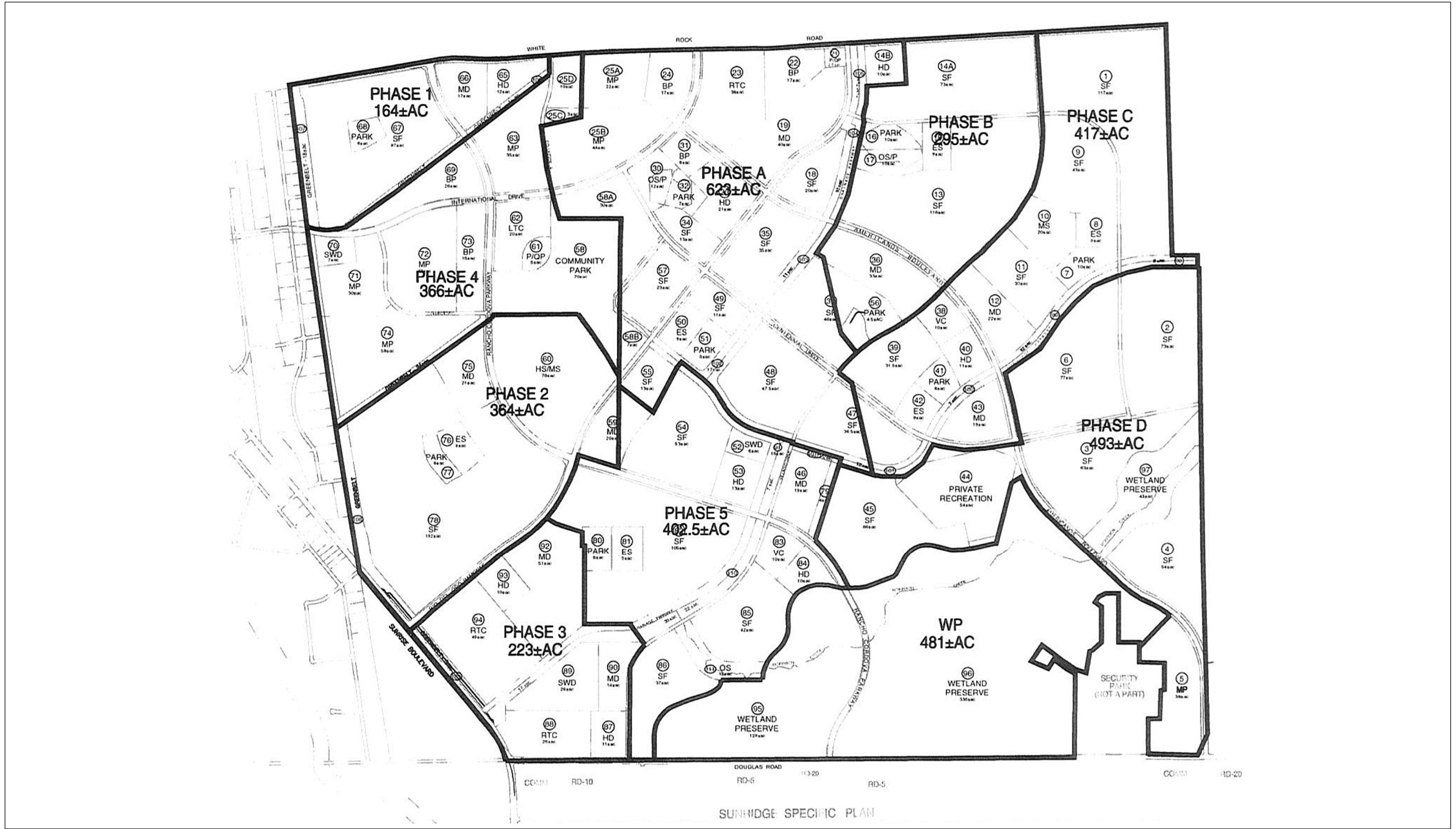
2.2.5 REVISED FIGURES

Exhibits 2-4, 2-12, and 2-13 of the 2006 DEIR/DEIS have been revised to show the project's land use plan, roadway circulation plan, and bikeway and trails plan consistent with the 2009 changes to the Specific Plan (see Chapter 5, "Corrections to the DEIR/DEIS").

2.2.6 MATRIX OF RIO DEL ORO SPECIFIC PLAN CHANGES

A summary of the changes to the Specific Plan and a comparison with the original text as proposed in 2006 has been prepared by the City, and is attached as Table 2-3. These changes are minor and fall within the range of environmental impacts evaluated in the 2006 DEIR/DEIS and the 2008 RDEIR/RDEIS; therefore, no changes to the analysis or the mitigation measures are required because these modifications would not substantially increase the intensity or severity of an impact or create a new significant impact. As stated in Section 2.2.4 above, when specific development applications are received in the future, the City, as CEQA lead agency, will review the areas evaluated in this EIR/EIS at a program level and the areas evaluated at a project level, as shown in Exhibits 2-4 and 2-14 of the 2006 DEIR/DEIS, and at that time will determine what, if any, additional environmental analysis may be necessary. The NEPA and permitting process described in the DEIR/DEIS and RDEIR/SDEIS remains unchanged as a result of the changes to the Specific Plan.

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Source: Andrea Mayer Consulting 2009

Revised Phasing Plan

Rio del Oro Specific Plan Project Administrative FEIR/FEIS
 City of Rancho Cordova and USACE
 P 03110089.01 11/09

EXHIBIT 2-1

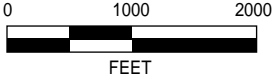


Table 2-3 Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)			
December 2006 Version		October 2009 Version	
Page/Reference	Old Text	Page/Reference	New Text
p. 1-2, § 1.3	The Rio Del Oro Specific Plan is designed as a mixed use community, which includes a variety of residential uses, commercial services, employment, parks, schools, public uses and open space uses. The RDOSP is planned as a smart suburb where residents can live work and play. The project purpose and objectives are:	p. 1-2, § 1.3	<u>The Rio Del Oro Specific Plan (RDOSP) is designed as a balanced, mixed-use community in keeping with the City’s vision as defined in the General Plan and implementing the smart growth and building block concepts in the Rio Del Oro land use plan. Specifically, Rio Del Oro establishes a new “District” within the City of Rancho Cordova, comprised of neighborhoods and villages. The project integrates village centers, regional town centers and a local town center with a variety of residential uses, commercial services, employment, parks, schools, public uses and open space uses. The project purpose and objectives are as follows:</u>
p. 1-2, § 1.3.1	• Contribute to the economic development of the City of Rancho Cordova and the greater Sacramento region by providing a mixed use community that is consistent with the objectives of the City of Rancho Cordova while bringing a positive image to the City and helping to create an identity for the city.	p. 1-2, § 1.3.1	<u>The RDOSP project serves to contribute to the economic development of the City of Rancho Cordova and the greater Sacramento region by providing a mixed use community that is consistent with the City of Rancho Cordova General Plan while bringing a positive image to the City and helping to create an identity for the city. Specifically, Rio Del Oro responds to and parallels the following General Plan Land Use goals:</u> <ul style="list-style-type: none"> • <u>Goal LU.1: Achieve a balanced and integrated land use pattern throughout the community</u> • <u>Goals LU.2: Establish growth patterns based on smart growth principles and the City building blocks concept</u> • <u>Goal LU.3: Establish Rancho Cordova as a destination place in the region</u> • <u>Goal LU.6: Ensure development of the Planning Areas consistent with the City’s vision</u>

Table 2-3 Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)			
December 2006 Version		October 2009 Version	
Page/Reference	Old Text	Page/Reference	New Text
p. 1-2, § 1.3.2		p. 1-2, § 1.3.2	<u>The following project objectives serve to implement the project purpose:</u>
p. 1-3, § 1.3.2, Last two bullets	<ul style="list-style-type: none"> • Facilitate the implementation of regional and City transportation circulation linkages, especially Rancho Cordova Parkway and Americanos Boulevard from the project site north of U.S. 50. • Facilitate the expansion and use of alternate modes of transportation. 	p. 1-3, § 1.3.2, Last two bullets	<ul style="list-style-type: none"> • Facilitate <u>(via fair share contributions or other additional measures as may be negotiated in the development agreements)</u> the implementation of regional and City transportation circulation linkages, especially Rancho Cordova Parkway and Americanos Boulevard from the project site north of U.S. 50. • Facilitate <u>(via fair share contributions or other additional measures as may be negotiated in the development agreements)</u> the expansion and use of alternate modes of transportation.
p. 1-3, §1.4	<p>Development of the RDOSP requires the approval of the following entitlements by the City of Rancho Cordova:</p> <ul style="list-style-type: none"> • Amendment to the Rancho Cordova General Plan • Adoption of the Rio Del Oro Specific Plan • Amendment to the Aerojet Special Planning Area (SPA) Ordinance (SZC 95-0014) • Amendment to the Urban Policy Area Boundary, if needed • Adoption of a Public Facilities Financing Plan • Large Lot Subdivision Maps and Tentative Subdivision Maps for Phase 1 • Adoption of Development Agreements <p>Development of the RDOSP requires the approval of the following actions by State, Federal and other agencies:</p>	p. 1-3, § 1.4	<p>Development of the RDOSP requires the approval of the following entitlements by the City of Rancho Cordova:</p> <ul style="list-style-type: none"> • Adoption of the Rio Del Oro Specific Plan • Amendment to the Aerojet Special Planning Area (SPA) Ordinance (SZC 95-0014) • Amendment to the Urban Policy Area Boundary, if needed • Adoption of a Tier 1 Development Agreement(s) <p>Development of the RDOSP requires the approval of the following actions by State, Federal and other agencies:</p> <ul style="list-style-type: none"> • Regional Water Quality Control Board Permits (Section 401) • Clean Water Act Permits (Section 404) • Streambed Alteration Agreements (Section 1602)

Table 2-3 Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)			
December 2006 Version		October 2009 Version	
Page/Reference	Old Text	Page/Reference	New Text
	<ul style="list-style-type: none"> • Regional Water Quality Control Board Permits (Section 401) • Clean Water Act Permits (Section 404) • Streambed Alteration Agreements (Section 1602) • Agreement pursuant to Section 7 of the Federal Endangered Species Act • Annexation to SCRSD/CSD#1 <p>Future approvals may include, but are not limited to the following:</p> <ul style="list-style-type: none"> • Subdivision Maps for areas outside of Phase 1 • Lot Line Adjustments • Engineering Improvement Plans • Design Review (if needed) • Use Permits 		<ul style="list-style-type: none"> • Agreement pursuant to Section 7 of the Federal Endangered Species Act • Annexation to SCRSD/CSD#1 <p><u>Future approvals will require the approval of single Financing Plan and a Phasing Master Plan prior to or contemporaneous with the approval of any Large Lot Maps. Tier 2 Development Agreement shall also be approved contemporaneous with the approval of the Large Lot Maps. Large Lot Maps and Tier 2 Development Agreements may be processed separately, so long as the phasing, financing and details of other Specific Plan implementation measures will be implemented to the City satisfaction. Other future approvals may include, but are not limited to the following:</u></p> <ul style="list-style-type: none"> • <u>Adoption of the Tier 2 Development Agreements</u> • <u>Adoption of the Rio Del Oro Affordable Housing Agreement(s)</u> • <u>Adoption of a Public Facilities Financing Plan</u> • <u>Large Lot Maps</u> • <u>Tentative Subdivision Maps</u> • Lot Line Adjustments • Engineering Improvement Plans • Design Review (if needed) • Use Permits
p. 1-4, §1.5.2, third ¶	When conflicts occur between the provisions in the Rancho Cordova Zoning Ordinance and the RDOSP Development Standards, the provisions of this Specific Plan shall apply.	p. 1-5, §1.5.2, third ¶	When conflicts occur between the provisions in the Rancho Cordova Zoning Ordinance and the RDOSP Development Standards, the provisions of this Specific Plan <u>and Development Standards</u> shall apply.

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p. 1-4, §1.5.3	In accordance with the City of Rancho Cordova Zoning Ordinance Chapter 12, Article 1, the project will execute a Development Agreement subject to the provisions of the Specific Plan. The Rio Del Oro Development Agreement, as it relates to the development of the Plan Area, will set forth the needed infrastructure improvements, the timing and method for financing improvements and other specific performance obligations of the property owner and the City of Rancho Cordova.	p. 1-5, §1.5.3	<u>Implementation of the policies set forth in this Specific Plan document will be governed by a series of development agreements between the City and the developers. A multi-tier approach to development agreement execution will establish the conditions of and mitigation measures for Project development. The first tier development agreement(s) will be executed as part of the Specific Plan approval process. The Tier 1 development agreement(s) will outline the general provisions and procedures that will apply to all phases of project development. The City and Project developers will enter into separate second tier development agreements covering one or more subsequent phases of Project development. The Tier 2 development agreement(s) will specify the project conditions and policies particular to each phase of development and will be executed prior to approval of the first Large Lot map. Prior to or contemporaneous with the approval of any Large Lot Map and/or Tier 2 Development Agreement, the City shall adopt a single Financing Plan and a Master Phasing Plan that will specify the financing and timing for infrastructure development applicable to the entire Specific Plan area. The Tier 2 Development Agreements and the conditions of approval on all subsequent entitlements will set forth the needed infrastructure improvements, the timing and method for financing improvements and other specific performance obligations of the property owner and the City of Rancho Cordova.</u>

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p. 1-4, §1.5.4	Concurrent with approval of this Specific Plan, a Public Facilities Financing Plan was adopted by the Rancho Cordova City Council. The Public Facilities Financing Plan defines the specific mechanisms which will be required to fund the capital costs of all infrastructure necessary as a result of Specific Plan build-out. The Financing Plan also defines funding for the maintenance of new infrastructure and public services needed by the future residents and business within the Plan Area.	p. 1-6, §1.5.4	<u>Subsequent to approval of this Specific Plan and prior to the approval of the first Large Lot Map for residential units, a Public Facilities Financing Plan will be adopted by the Rancho Cordova City Council.</u> The Public Facilities Financing Plan <u>will apply to the entire Specific Plan Area and shall</u> defines the specific mechanisms which will be required to fund the capital costs of all infrastructure necessary as a result of Specific Plan build-out. The Financing Plan also defines funding for the maintenance of new infrastructure and public services needed by the future residents and business within the Plan Area.
p. 1-4, §1.5.5	Concurrent with the approval of this Specific Plan, a comprehensive Public Facilities Infrastructure/ Phasing Plan was adopted by the City Council. The Public Facilities Infrastructure/Phasing Plan provides specific details regarding the phasing, sizing and costs of public facilities described in this document. The Public Facilities Infrastructure/Phasing Plan defines the facility requirement to develop each phase of the Plan Area. The plan also includes maps showing the alignment and location of facilities, cost estimates and construction timing requirements.	p. 1-6, §1.5.5	Concurrent with the approval of this Specific Plan, a comprehensive Public Facilities Infrastructure/ Phasing Plan was adopted by the City Council. The Public Facilities Infrastructure/Phasing Plan, <u>Appendix B, provides information</u> regarding the <u>general</u> phasing, sizing and costs of public facilities described in this document. <u>A more detailed phasing plan (“Phasing Master Plan”) will be adopted by the City prior to or contemporaneous with the approval of any Large Lot Maps, and shall define in detail</u> the facility requirements to develop each phase of the Plan Area. The plan also includes maps showing the alignment and location of facilities, cost estimates and construction timing requirements. <u>The improvements and requirements described in Appendix B are based on the standards and policies in effect at the time of the RDOSP approval, but notwithstanding anything in this Phasing Plan to the contrary, should any of such standards and/or policies change in the future, then these</u>

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			<u>improvements and requirements may also change. Furthermore, these improvements and requirements may change as provided in the future Phasing Master Plan, the Tier 2 Development Agreements, the terms of which shall prevail in the event of any inconsistency with the Public Facilities Infrastructure/Phasing Plan.</u>
p. 1-5, §1.6	This Specific Plan implements and is consistent with the goals, policies and objectives of the Rancho Cordova General Plan. If conflicts occur between subsequent amendments to the Rancho Cordova General Plan and this Specific Plan, the provisions of this Specific Plan shall govern.	p. 1-6, §1.6	<u>The City of Rancho Cordova General Plan serves as the long-term policy guide for the physical and economic growth of the City. By virtue of state law, all development plans, project and activities must be consistent with the General Plan. The guiding principles and project objectives of the Rio Del Oro Specific Plan parallel the goals of the General Plan, as outlined in Section 1.3. This Specific Plan implements and is consistent with the goals, policies and objectives of the Rancho Cordova General Plan, as amended. If conflicts occur between subsequent amendments to the Rancho Cordova General Plan and this Specific Plan, the provisions of this Specific Plan shall govern.</u>
p. 2-3, §2.4.5	The Plan Area is located approximately 2 miles northeast of Mather Airport. The northwestern portion of the Plan Area lies within the runway approach pattern and is subject to noise levels of 60 to 70 CNEL. The Mather Airport Policy Area (MAPA) and the Comprehensive Land Use Plan (CLUP) govern and restrict uses within this area to ensure compatibility.	p. 2-3, §2.4.5	The Plan Area is located approximately 2 miles northeast of Mather Airport. The northwestern portion of the Plan Area lies within the runway approach pattern and is subject to noise levels of 60 to 70 CNEL. The Mather Airport Policy Area (MAPA) and the Comprehensive Land Use Plan (CLUP) govern and restrict uses within this area to ensure compatibility. <u>Specifically, residential uses are not permitted within the Mather Airport noise contour zone. The noise contours are subject to revision and refinement as part of the Mather Airport Master Plan (MAMP). If new noise contours</u>

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			<p>affecting the Rio Del Oro Plan Area are subsequently adopted as part of the MAMP, the RDOSP may be modified or amended as outlined in Section 8.3 to allow for additional residential uses in conjunction with non-residential uses as part of a mixed use project (vertical or horizontal).</p>
p. 3-2, Exhibit 3-1	<p>Village Core</p> <ul style="list-style-type: none"> Envisioned as the central hub to civic and recreational activities to the community. 403 acre community park. Middle/High School hub provided amenities in combination with the local town center. 	p. 3-2, Exhibit 3-1	<p>Village Core</p> <ul style="list-style-type: none"> Envisioned as the central hub to civic and recreational activities to the community. <u>107</u> acre community park. Middle/High School hub provided amenities in combination with the local town center.
p. 3-2, Exhibit 3-1	<p>Regional Town Center</p> <ul style="list-style-type: none"> 76 acres of retail/lifestyle center for customers in both Rancho Cordova & surrounding markets. 	p. 3-2, Exhibit 3-1	<p>Regional Town Center</p> <ul style="list-style-type: none"> <u>75</u> acres of retail/lifestyle center for customers in both Rancho Cordova & surrounding markets.
p. 3-3, § 3.2, third bullet	<p>...In addition, a shuttle system is proposed to provide linkages to the planned light rail station at Rancho Cordova Parkway/Folsom Boulevard and to connect to Capital Center.</p>	p. 3-3, § 3.2, third bullet	<p>...In addition, a <u>City managed</u> shuttle system is proposed to provide linkages to the planned light rail station at Rancho Cordova Parkway/Folsom Boulevard and to connect to Capital Center.</p>
p. 3-3, § 3.2.1.1, second ¶	<p>The 22± acre site is envisioned to facilitate a variety of commercial mixed uses and public/quasi public uses with a “main street” feel.</p>	p. 3-3, § 3.2.1.1, second ¶	<p>The <u>20±</u> acre site is envisioned to facilitate a variety of commercial mixed uses and public/quasi public uses with a “main street” feel.</p>
p. 3-5, § 3.2.1.5	<p>The Rio Del Oro open space network will provide flood control and allow for recreation opportunities within the Plan Area. An integral concept of the RDOSP is to provide...</p>	p. 3-5, § 3.2.1.5	<p>The Rio Del Oro open space network will provide flood control and allow for recreation opportunities within the Plan Area. <u>Recreational opportunities may occur in all areas except for the wetland preserve.</u> An integral concept of the RDOSP is to provide...</p>

**Table 2-3
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p. 3-7, Exhibit 3-2 and p. 3-8, Table 3-1	Land Use	Acres	% of Total Acres	% of Total Units	Units	p. 3-7, Exhibit 3-2 and p. 3-8, Table 3-1	Land Use	Acres	% of Total Acres	% of Total Units	Units
	Residential						Residential				
	SF	1,597	41.7%	69%	7,985		SF	1,518.5	39.7%	65%	7,593
	MD	237	6.1%	16%	1,896		MD	256.0	6.7%	18%	2,048
	HD	86	2.2%	15%	1,720		HD	98.0	2.6%	17%	1,960
	Subtotal	1,920	50%	100%	11,601		Subtotal	1,872.5	49.0%	100%	11,601
	Village Services and Employment						Village Services and Employment				
	VC	20	0.5%				VC	20.0	0.5%		
	LTC	22	0.5%				LTC	20.0	0.5%		
	RTC	111	3.0%				RTC	113.0	3.0%		
	BP	86	2.5%				BP	86.0	2.2%		
	MP	282	7.4%				MP	283.0	7.4%		
	Subtotal	521	13.9%				Subtotal	522.0	13.6%		
	Education						Education				
	HS/MS	78	2.0%				HS/MS	78	2.0%		
	MS	20	0.5%				MS	20	0.5%		
	ES	54	1.4%				ES	54	1.4%		
	Subtotal	152	3.9%				Subtotal	152	3.9%		
	Open Space & Public						Open Space & Public				
	CP	107	2.8%				CP	107	2.8%		
	P/QP	9.5	0.3%				P/QP	7.5	0.2%		
	Park	63	1.6%				NP	67.5	1.8%		
	SWD	39	1.0%				SWD	39.0	1.0%		
	WP	507	13.2%				WP	510.0	13.3%		
	DP	143	3.7%				DP	138.0	3.6%		
	PR	54	1.4%				PR	54.0	1.4%		
	OS	12	0.3%				OS	12.0	0.3%		
OS/P	24	0.6%			OS/P	22.0	0.6%				
LC	44	1.2%			LC	82.0	2.1%				

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	GB	50	1.3%			GB	51.0	1.3%	
	ROW	183	4.8%			ROW	192.0	5.0%	
	Subtotal	1,235.5	32.2%			Subtotal	1,282.0	33.4%	
	Total	3,828.5	100%	11,601		Total	3,828.5	100%	11,601
p. 3-9, § 3.4.1, first ¶	The SF district permits single-family development, with a density range of 2.1 to 6 dwelling units per acre. The size and type of lots anticipated will range from one half-acre executive lots to moderate sized lots with half-plexes and second units encouraged. Use of alternative garage configurations, porches and front courtyards are encouraged and are further addressed in the Development Standards and Design Guidelines.				p. 3-9, § 3.4.1, first ¶	The SF district permits single-family development, with a density range of 2.1 to 6 dwelling units per acre. The size and type of lots anticipated will range from one half-acre executive lots to moderate sized lots with half-plexes and second units encouraged. <u>Portions of the highlighted parcels shown on Exhibit 3-3 are candidate locations where executive housing may be executed.</u> Use of alternative garage configurations, porches and front courtyards are encouraged and are further addressed in the Development Standards and Design Guidelines. Exhibit 3-3: Candidate locations for executive housing added.			
p. 3-10, § 3.5.1	...The Local Town Center is located within the Village Core, providing a unique setting to blend the retail and office uses with the adjacent Community Park and public uses.				p. 3-11, § 3.5.1	...The Local Town Center is located within the Village Core, providing a unique setting to blend the retail and office uses with the adjacent Community Park and public uses. <u>Due to the current noise contours of Mather Airport, residential uses are not permitted within the TLC. However if at such time the noise contours are amended, the City will encourage the vertical and/or horizontal integration of high density residential units in conjunction with the non-residential uses of the property. The RDOSP may be modified or amended as outlined in Section 3.8 or Section 8.4.</u>			

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p. 3-12, § 3.6, second and third	<p>...The proximity of the employment land uses to Rancho Cordova Parkway, a designated transit line, and to the Town Center, will contribute to the ability of workers to use alternative transit modes and have services nearby, thus reducing vehicle trips.</p> <p>MP uses are also located adjacent to the existing Security Park industrial complex in the southeast corner of the Plan Area...</p>	p. 3-13, § 3.6, between second and third ¶¶	<p>...The proximity of the employment land uses to Rancho Cordova Parkway, a designated transit line, and to the Town Center, will contribute to the ability of workers to use alternative transit modes and have services nearby, thus reducing vehicle trips.</p> <p><u>The RDOSP supports the concept of mixed use in order to encourage trip reduction and transit use as well as supporting a vibrant shopping and employment center. However, due to current noise contours of Mather airport, residential uses are not permitted in the employment center within the northwestern portion of the Plan Area, which includes BP, MP, the White Rock RTC and the Local Town Center. If subsequent adoption of the Mather Airport Master Plan shrinks the noise contour zone, it is anticipated that the Specific Plan may be modified or amended to allow the addition of residential uses to employment parcels, specifically the LTC, White Rock RTC and the BP and MP parcels along Rancho Cordova Parkway. Any additional residential uses would be developed in conjunction with non-residential uses as part of a mixed use project (vertical or horizontal) while striving to maintain the employment capabilities on the site. The RDOSP may be modified or amended as outlined in Section 3.8 or Section 8.4.</u></p> <p><u>MP parcel 25B, located north of International Drive, is a potential location for an approximate 40 acre sports park facility. The Specific Plan anticipates the possible future direction by the City to locate the recreation facility on MP designated land by including recreation uses as conditionally permitted</u></p>

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			<p><u>uses in the MP district.</u></p> <p>MP uses are also located adjacent to the existing Security Park industrial complex in the southeast corner of the Plan Area...</p>
p. 3-12, § 3.7, first ¶	Approximately 170 acres of parks, 507 acres of wetland preserve, 152 acres of public uses, such as schools, and approximately 366 acres of miscellaneous open space type of uses are designated within the RDO Plan Area.	p. 3-13, § 3.7, first ¶	Approximately <u>174</u> acres of parks, <u>510</u> acres of wetland preserve, <u>159</u> acres of public uses, such as schools, and approximately <u>398</u> acres of miscellaneous open space type of uses are designated within the RDO Plan Area.
p. 3-13, § 3.7.2, first ¶	A total of 3 sites are designated for public/ quasi public use. This zoning is applied to a 5 acre parcel located within the Village Core, anticipated to accommodate a number of uses, such as a day care, transit center, library or post office which will support the community use of the Village Core. The two additional sites are approximately 2 acres and may also accommodate similar uses. Public/Quasi Public uses may also be allowed within other land use designations as outlined by the Development Standards/Design Guidelines.	p. 3-14, § 3.7.2, first ¶	A total of <u>2</u> sites are designated for public/ quasi public use. This zoning is applied to a 5 acre parcel located within the Village Core, anticipated to accommodate a number of uses, such as a day care, transit center, library or post office which will support the community use of the Village Core. <u>The additional site, approximately 2 acres, is located at the corner of Rio Del Oro Parkway and White Rock Road and may also accommodate similar uses.</u> Public/Quasi Public uses may also be allowed within other land use designations as outlined by the Development Standards/Design Guidelines.
p. 3-13, § 3.7.3, first ¶	Parks are allocated within the RDOSP, comprised of one Community Park and 8 neighborhood parks.	p. 3-14, § 3.7.3, first ¶	Parks are allocated within the RDOSP, comprised of one Community Park and <u>9</u> neighborhood parks.
p. 3-13, § 3.7.3, first and second ¶	<p>...community gathering facilities such as an amphitheater and plaza. The joint high school/middle school is also located adjacent to the Community Park, providing a joint facility of over 180 acres in size.</p> <p>The neighborhood parks are intended to serve as a focal point for each neighborhood, providing a gathering place with smaller scale recreational</p>	p. 3-14, § 3.7.3, between first and second ¶	<p>...community gathering facilities such as an amphitheater and plaza. <u>Please refer to the Development Standards and Design Guidelines for a complete list of all allowed public uses.</u> The joint high school/middle school is also located adjacent to the Community Park, providing a joint facility of over 180 acres in size.</p>

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	facilities, such as tot lots, playgrounds, multi-use turf fields and BBQ picnic areas...		<p><u>In addition to the designated Community Park site, the City has identified a potential site for a sports park which may be located just north of the Rio Del Oro Community Park on MP parcel 25B. The Specific Plan anticipates the possible future decision by the City to locate this facility on this site by allowing recreation uses as conditionally permitted in the MP district.</u></p> <p>The neighborhood parks are intended to serve as a focal point for each neighborhood, providing a gathering place with smaller scale recreational facilities, such as tot lots, playgrounds, multi-use turf fields and BBQ picnic areas...</p>
p. 3-13, § 3.7.4, first ¶	The 51 acre private recreation site is located adjacent to Americanos Boulevard and the wetland preserve.	p. 3-15, § 3.7.4, first ¶	The <u>54</u> acre private recreation site is located adjacent to Americanos Boulevard and the wetland preserve.
p. 3-14, § 3.7.6	<p>A 507-acre wetlands preserve area is located in the southern portion of the project, protecting Morrison Creek and 52% of the existing vernal pools and associated upland habitat. Vernal pool creation, maintaining approximately 250' buffers from existing vernal pool features, will occur within this preserve area also.</p> <p>impacts will occur to elderberry shrubs and smaller wetland features that have become established among the tailings. Potential impacts to Valley Elderberry Longhorn Beetle (VELB) will be mitigated on site within two preserves and several mitigation areas; impacts are described in Section 5.4. Mitigation for non-vernal pool wetland habitat impacts will occur within drainage corridors and open space/detention areas within the Plan Area boundaries.</p>	p. 3-16, § 3.7.6	<p>A <u>510-acre</u> wetlands preserve area is located in the southern portion of the project, protecting Morrison Creek and 52% of the existing vernal pools and associated upland habitat. Vernal pool creation, maintaining approximately 250' buffers from existing vernal pool features, will occur within this preserve area also.</p>

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p. 3-15, § 3.8, second ¶	...subdivision design or other considerations. To request a minor density adjustment, the owner or owners of both the transfer and receiving parcels shall submit to the Planning Director a Request for Minor Density Adjustment, identifying the impacted parcels, designating the number of units requested for transfer and providing other documentation as required by the Planning Director to determine compliance with all of the unit transfer criteria below.	p. 3-16, § 3.8, second ¶	...subdivision design or other considerations. <u>If subsequent adoption of the Mather Airport Master Plan shrinks the noise contour zone, the City of Rancho Cordova will encourage and allow the transfer of density to facilitate the addition of high density residential development in conjunction with non-residential uses, specifically in the LTC designation.</u> <u>Minor density adjustment, if consistent with the following criteria, are contemplated by and within the intent of this Specific Plan and the RDO EIR and will not require an amendment to the Specific Plan or the City's General Plan.</u>
p. 3-15, § 3.8, after fourth bullet	If, in the opinion of the Planning Department... If the Planning Director determines that the minor density adjustment is not consistent with the criteria, the minor density adjustment shall be denied or may be referred or appealed to the Planning Commission for resolution. Any determination of consistency may, at the discretion of the Planning Director, be forwarded to the Planning Commission for review. In the case when applicants request density adjustments that do not comply with the above criteria, such requests shall require an amendment to the Specific Plan.	p. 3-16, § 3.8, after fourth bullet	<u>To request a minor density adjustment, the owner or owners of both the transfer and receiving parcels shall submit an Administrative Permit to the Planning Director identifying the impacted parcels, designating the number of units being transferred and providing other documentation as required by the Planning Director to determine compliance with the above units transfer criteria. The applicant shall also provide a revised Specific Plan Table 3-2 Parcel Summary reflecting the adjusted unit counts and densities. The revised table will be the official record tracking unit allocations to each large lot residential parcel.</u> <u>If the Planning Director determines that the minor density adjustment is not consistent with the criteria, the minor density adjustment shall be denied. The Planning Director may also refer the matter to the Planning Commission for consideration to determine if the minor density adjustment is consistent with the</u>

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			<u>criteria set forth herein. The land owner may also appeal the determination of the Planning Director to the Planning Commission. All decisions of the Planning Commission are subject to appeal to the City Council.</u>
p. 3-17, Table 3-2		p.3-18, Table 3-2	<i>Table 3-2 revised and updated.</i>
p. 4-4, § 4.3.1.1	<p>4.3.1.1 6 Lane Major Arterials with Enhanced Transit Corridor</p> <ul style="list-style-type: none"> • Rancho Cordova Parkway (north of Wetland Preserve) • Rio Del Oro Parkway (west of Rancho Cordova Parkway) <p>This portion of Rancho Cordova Parkway will be the primary connector from the central core of the Plan Area to a future interchange with Highway 50 between Sunrise Boulevard and Hazel Avenue. This portion of Rio Del Oro Parkway serves as a primary entry to the Plan Area from Sunrise Boulevard.</p> <p>These roadways will provide a 16' landscaped median, 3 travel lanes in each direction with the inside lane to accommodate an enhanced transit corridor. 8' wide sidewalks are provided within a 36' landscape corridor on each side.</p>	p. 4-4, § 4.3.1.1	<p>4.3.1.1 6 Lane Major Arterials with Enhanced Transit Corridor</p> <ul style="list-style-type: none"> • Rancho Cordova Parkway (north of Wetland Preserve) • Rio Del Oro Parkway (west of Rancho Cordova Parkway) • <u>International Drive (west of Rancho Cordova Parkway)</u> • <u>White Rock Road</u> <p>This portion of Rancho Cordova Parkway will be the primary connector from the central core of the Plan Area to a future interchange with Highway 50 between Sunrise Boulevard and Hazel Avenue. <u>These portions of Rio Del Oro Parkway and International Drive serve as entries to the Plan Area from Sunrise Boulevard. White Rock Road runs along the northern periphery of the Plan Area and serves as the primary east-west parallel route to Highway 50.</u> These roadways will provide a 16' landscaped median, 3 travel lanes in each direction with the inside lane to accommodate an enhanced transit corridor. 8' wide sidewalks are provided within a <u>variable width</u> landscape corridor on each side.</p>

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p. 4-6, § 4.3.1.3	<p>4.3.1.3 International Drive (west of Rancho Cordova Parkway)</p> <p>International Drive west of Rancho Cordova Parkway will provide a future entry into the Plan Area connecting the zoned MP to the existing MP located outside the Plan Area.</p> <p>This roadway will provide a 16' landscaped median, 3 travel lanes in each direction with the inside lane to accommodate an enhanced transit corridor, and an 8' sidewalk within a 15' landscape corridor.</p>	p. 4-6, § 4.3.1.3	<p>4.3.1.3 International Drive (<u>east</u> of Rancho Cordova Parkway)</p> <p>International Drive <u>east</u> of Rancho Cordova Parkway will provide <u>access from White Rock Road to the zoned MP and BP lane in the Plan Area.</u></p> <p>This roadway will provide a 16' landscaped median, <u>2</u> travel lanes in each direction with <u>an auxiliary lane in each direction</u> and an 8' sidewalk within a 15' landscape corridor.</p>
p. 4-7, § 4.3.1.4	<p>4.3.1.4 4 Lane Major Arterial</p> <ul style="list-style-type: none"> • Americanos Boulevard • Portion of International Drive & • Portion of Rio Del Oro Parkway <p>Americanos Boulevard will be the primary north to south roadway on the eastern side of the Plan Area. This roadway will provide a 16' landscaped median, 2 travel lanes in each direction and 8' wide sidewalks within a 31'-39' varying width landscape corridor.</p>	p. 4-7, § 4.3.1.4	<p>4.3.1.4 4 Lane Major Arterial</p> <ul style="list-style-type: none"> • Americanos Boulevard • Portion of Rio Del Oro Parkway <p>Americanos Boulevard will be the primary north to south roadway on the eastern side of the Plan Area.</p> <p>This roadway will provide a 16' landscaped median, 2 travel lanes in each direction and 8' wide sidewalks within a 31'-39' varying width landscape corridor. <u>The landscape corridor and sidewalks will not be provided along the west side of Americanos Boulevard adjacent to the wetland preserve.</u></p>
p. 4-9, § 4.3.2.1	<p>4.3.2.1 2 Lane Secondary Roads with Expansion to 4 Lanes</p> <ul style="list-style-type: none"> • Rio Del Oro (north of the Drainage Parkway) • International Drive (east of Road B) <p>This portion of Rio Del Oro Parkway will extend from the Drainage Parkway through the central portion of the Plan Area to White Rock Road. International Drive, east of Road B, will provide the</p>	p. 4-9, § 4.3.2.1	<p>4.3.2.1 2 Lane Secondary Roads with Expansion to 4 Lanes</p> <ul style="list-style-type: none"> • Rio Del Oro (north of the Drainage Parkway) • <u>Centennial Drive</u> • <u>Villagio Drive from White Rock to Collector B and from Douglas Road to the Morrison Creek Bridge.</u>

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	<p>primary east-west circulation through the Plan Area, connecting to Americanos Boulevard.</p> <p>These roadways will provide a right-of-way to accommodate future expansion to 4 lanes. Initial improvements provide a 36' landscaped median, 1 travel lane in each direction, Class II bike lanes and 8' wide sidewalks in a 31' landscape corridor.</p>		<p>This portion of Rio Del Oro Parkway will extend from the Drainage Parkway through the central portion of the Plan Area to White Rock Road. <u>Centennial Drive provides internal circulation for the Plan Area beginning at International Drive and terminating just east of Americanos Boulevard. Centennial Drive will ultimately be extended through future residential areas (Large Lot Parcels 2 and 3) east to Grant Line Road. Segments of Villagio Drive are also planned as 2 lane secondary roads, which serve to disseminate traffic in to the Plan Area from Douglas Road and White Rock Road.</u> These roadways will provide a right-of-way to accommodate future expansion to 4 lanes. Initial improvements provide a 36' landscaped median, 1 travel lane in each direction, Class II bike lanes and 8' wide sidewalks in a 31' landscape corridor.</p>
p. 4-10, § 4.3.2.2	<p>4.3.2.2 2 Lane Limited Access Arterial</p> <ul style="list-style-type: none"> Villagio Drive <p>Villagio Drive will link White Rock Road to Douglas Boulevard and runs parallel to Rio Del Oro Parkway through the center of the Plan Area. The roadway will provide a 16' landscaped median, 1 travel lane in each direction and 8' wide sidewalks in a 31' width landscape corridor.</p>	p. 4-10, § 4.3.2.2	<p>4.3.2.2 Lane Limited Access Arterial</p> <ul style="list-style-type: none"> <u>Central portion of Villagio Drive</u> <p>Villagio Drive will <u>run parallel to Rio Del Oro Parkway through the center of the Plan Area.</u> The roadway will provide a 16' landscaped median, 1 travel lane in each direction and 8' wide sidewalks in a 31' width landscape corridor.</p> <p><u>Access requirements along the limited access portion of Villagio Drive are:</u></p> <ol style="list-style-type: none"> <u>Traffic signals and median breaks will be permitted at a minimum spacing of 700 feet for non-residential parcels and 800 feet for residential parcels, measured from the roadway/intersection centerline.</u>

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			<ul style="list-style-type: none"> b. <u>Driveways will not be permitted within 250 feet of signalized intersections.</u> c. <u>Consolidation of driveways and secondary road access locations will be required when deemed feasible.</u> d. <u>On-street parking will be prohibited.</u> e. <u>Signalized intersections will provide a minimum single right hand and left hand turn pockets on all approaches.</u>
p. 4-16, § 4.3.4	<p><i>** § 4.3.4 in old document is § 4.3.5 in new document.</i></p> <p>4.3.4 Landscape Corridors/Easements</p> <p>...Landscape easement are not separate parcels, however, the easement will be dedicated to landscape enhancements. Landscape corridors or easements may be reduced in width at intersections in order to accommodate intersection improvements such as turn lanes, acceleration lanes, etc. Refer to the Rio Del Oro Development Standards/ Design Guidelines for more specific information on landscape corridors, easements, setback requirements and uses allowed within landscape easements.</p>	p. 4-17, § 4.3.5	<p><i>** § 4.3.4 in old document is § 4.3.5 in new document.</i></p> <p>4.3.5 Landscape Corridors/Easements</p> <p>...Landscape corridors or easements <u>widths may be reduced for intersection improvements. A minimum of 15 feet of width shall be maintained at widened intersections in order to accommodate intersection improvements such as turn lanes, acceleration lanes, etc.</u> Refer to Section 4.3.4 and the Rio Del Oro Development Standards/ Design Guidelines for more specific information on landscape corridors, easements, setback requirements and uses allowed within landscape easements.</p>
p. 4-16, § 4.3.5	<p><i>** § 4.3.5 in old document is § 4.3.4 in new document.</i></p> <p>4.3.5 Intersection Improvements</p> <p>Traffic control devices will be installed at intersections within the RDOSP based on analysis of future traffic calculations at full build-out of the Plan Area. Traffic signal and possible roundabout locations are reflected in Exhibit 4-2, Circulation Plan. Several possible roundabout locations are</p>	p. 4-16, § 4.3.4	<p><i>** § 4.3.5 in old document is § 4.3.4 in new document.</i></p> <p>4.3.4 Intersection Improvements</p> <p><u>Traffic control devices will be installed, when warranted, at intersections within the RDOSP based on analysis of future traffic calculations at full build-out of the Plan Area. Possible traffic signal locations are reflected in Exhibit 4-2, Circulation Plan. White Rock Road and International Drive are expressway</u></p>

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	<p>proposed where two lane streets intersect and would otherwise require some form of stop control. Use of roundabouts in these locations may result in better traffic operations and provide traffic calming. However, if the streets are widened to 4 lanes in the future, the roundabouts may be modified to a signalized intersection if conditions warrant.</p>		<p><u>corridors, therefore the traffic signals shall be limited to those shown on Exhibit 4-2. Roundabouts may be considered as an alternative traffic control option at two locations on Villagio Drive. Additional traffic signal locations will be considered by the City at the tentative subdivision map and project development phases to ensure that minimum signal spacing requirements are met. The use of roundabouts will be evaluated at the time of tentative subdivision map for the adjacent residential villages. Major streets will have widened rights-of-ways at intersections in order to accommodate standard intersection improvements such as turn lanes and acceleration lanes. In addition, the transit corridors along Rancho Cordova Parkway, White Rock Road and International Drive may accommodate additional widening for transit vehicle queue bypass turnout and widened medians for pedestrian refuge. Intersection improvements at all arterial intersections to facilitate pedestrian safety will be determined by Public Works at the time of tentative maps and/or improvement plans, in accordance with the adopted City improvement standards. Exhibit 4-3 illustrates a transit corridor widened intersection.</u></p> <p><u>Exhibit 4-3, Transit Corridor Widened Intersection, inserted.</u></p>
p. 4-16, § 4.3.6	<p>4.3.6 Traffic Calming</p> <p>The purpose of traffic calming measures is to create livable neighborhoods by managing traffic volumes and speeds. Traffic calming measures should be applied where appropriate on local streets to soften the impact of motor vehicles.</p>	p. 4-17, § 4.3.6	<p>4.3.6 Traffic Calming</p> <p>The purpose of traffic calming measures is to create livable neighborhoods by managing traffic volumes and speeds. Traffic calming measures should be applied where appropriate on local streets to soften the impact of motor vehicles. <u>The City of Rancho</u></p>

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	<p>Consideration should be given to enhanced landscaping upon entering local neighborhood streets. Other traffic calming devices that can be applied include traffic circles, bulb outs and raised intersections. Bulb outs are pedestrian enhancements that shorten the pedestrian crossing distance at intersections or mid-block crossings through a narrowing of the street, typically by eliminating parking. Raised intersections provide for reduced speeds and pedestrian enhancements through a raised profile where roadways approach an intersection, operating similarly to flat top road humps. There is presently no direct transit service to the project site. The closest transit routes provided by Regional Transit are routes 28, 73, 74, 91 and 109. The routes generally follow Folsom Boulevard and Highway 50 as main travel routes, with Route 73 traveling closest to the project site on Sunrise Boulevard and White Rock Road.</p> <p>In the absence of development, no service is proposed to locations in the Plan Area. Future expansion of RT to the area will depend on adequate funding and suitable residential density to support transit service. The RDOSP includes a system and facilities to promote public transportation including a transit center, bus turnouts, enhanced transit corridors, incentives to use public transit, etc.</p>		<p><u>Cordova Neighborhood Traffic Management Program should be utilized as a resource at the time of Tentative Subdivision Maps to select the most effective traffic calming designs and measures.</u></p> <p>Consideration should be given to enhanced landscaping upon entering local neighborhood streets. Other traffic calming devices that can be applied include traffic circles, bulb outs and raised intersections. Bulb outs are pedestrian enhancements that shorten the pedestrian crossing distance at intersections or mid-block crossings through a narrowing of the street, typically by eliminating parking. Raised intersections provide for reduced speeds and pedestrian enhancements through a raised profile where roadways approach an intersection, operating similarly to flat top road humps.</p>
p. 4-17, § 4.4	** § 4.4 in old document is § 4.5 in new document (no text changes).	p. 4-17, § 4.4	<i>Section 4.4, Public Transportation text and Exhibit 4-4, Public Transit Plan inserted.</i>

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p. 4-17, § 4.5, final sentence	<p>** § 4.5 in old document is § 4.6 in new document.</p> <p>...The Class I and II bicycle trails/lanes are reflected in Exhibit 4-3, Bikeway and Trails Plan.</p>	p. 4-21, § 4.6, final sentence	<p>** § 4.5 in old document is § 4.6 in new document.</p> <p>...The Class I and II bicycle trails/lanes are reflected in <u>Exhibit 4-5, Bikeway and Trails Plan.</u></p>
p. 4-17, § 4.5.1	<p>** § 4.5.1 in old document is § 4.6.3 in new document (no text changes).</p>	p. 4-25, § 4.6.3	<p>** § 4.5.1 in old document is § 4.6.3 in new document (no text changes).</p>
p. 4-19, § 4.5.2	<p>** § 4.5.2 in old document is § 4.6.1 in new document.</p> <p>4.5.2 Class I Bicycle Paths</p> <p>When complete, the RDOSP will provide over 15 miles of Class I, paved off-street bike paths as depicted in Exhibit 4-3. The RDOSP Class I bicycle system provides connectivity within the Plan Area for bicyclists and pedestrians. In addition, the paths accommodate emergency and maintenance vehicle access to open space. Class I bicycle path widths are planned as 10' of pavement flanked by 2' of decomposed granite. These trails will be located within varying widths of greenbelts, parks, open space and drainage parkways as shown in Exhibit 4-4.</p> <p>The RDOSP Class I bicycle paths have been divided into six distinct trails. The Village Trail starts at the western boundary of the Plan Area and runs through a greenbelt before looping through the Community Park, linking the Middle School/High School site, Local Town Center and Loop Trail. The Loop Trail connects the northern drainage parkway to White Rock Road and then back to the Community Park. Forking off the Loop Trail, the Central Trail follows both sides of the drainage parkway running east to west in the Plan Area. The Morrison Creek Trail begins at the western end of the Loop Trail. It runs</p>	p. 4-21, § 4.6.1	<p>** § 4.5.2 in old document is § 4.6.1 in new document.</p> <p><u>4.6.1 Class I Bicycle Paths</u></p> <p><u>When complete, the RDOSP will provide over 15 miles of Class I, paved off-street bike paths as depicted in Exhibit 4-5. The RDOSP Class I bicycle trails are a destination-oriented system that provides connectivity between major employment centers, neighborhood cores, schools, parks and open space, and other amenities within the Plan Area. Class I bicycle path widths are planned as 10' of pavement flanked by 2' of decomposed granite and the Regional Class I trail segments should be 12' of pavement. These trails will be located within varying widths of greenbelts, parks, open space and drainage parkways as shown in Exhibit 4-6. The Class I system has been designed to minimize conflicts with physical barriers such as major streets and creeks, and reduce potential travel disruption as approximately shown on Exhibit 4-5. This is achieved through the use of off-street bike lanes, at-grade and grade separated pedestrian and bicycle crossings where feasible. Exhibits 4-7 and 4-8 depict conceptual development and design features for future bikeway undercrossing occurring in conjunction with a vehicular bridge crossing of the</u></p>

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	<p>along the northern boundary of the wetlands preserve linking the eastern portion of the Plan Area to the West Trail. The West Trail runs along the western boundary of the Plan Area primarily in greenbelts terminating at White Rock Road. The North Trail branches off the West Trail and provides the northern most villages of the Plan Area with a connection to the rest of the bikeway trail system.</p> <p>The Class I system has been designed to minimize barriers and reduce potential travel disruption. Culvert crossings are planned at many locations throughout the Plan Area. At grade street crossings will occur where Class I paths do not cross at a drainage location.</p> <p>The RDOSP promotes frequent connections between the Class I system and adjacent uses. Where a single loaded street abuts open space, park or drainage parkway, the Class I path may replace the standard sidewalk on the open space side of the street. Where a cul-de-sac or loop street, multi-family or non-residential use abuts the Class I path, a paved link shall be provided to the path to the extent feasible. The Class I system within an open space area may meander to minimize environmental impacts and create visual interest.</p> <p>Barriers (bollards, rail fence, post and cable, posts, etc.) shall be provided along bike paths adjacent to open space preserve areas regulated by a Section 404 permit issued under the Federal Clean Water Act as shown in Exhibit 4-5. Such barriers shall comply with the 404 permit regarding use of the preserve area, and with City design, maintenance and public</p>		<p><u>primary drainage way along Rancho Cordova Parkway. Examples of at-grade bikeway crossing are provided in the Rio Del Oro Design Standards and Development Guidelines. In addition, the Class I bikeway paths may accommodate emergency and maintenance vehicle access to open space.</u></p> <p><u>The RDOSP Class I bicycle path system consists of six distinct trails. The Rio Del Oro Trail serves as the backbone of the Class I trail system. This trail traverses from the northeast to the southwest portion of the plan area, creating a connected system of parks, paseos, neighborhood greens, and open spaces along a naturalized greenway. The Rio Del Oro trail also connects key origins and destinations within the Plan Area and provides direct connectivity to neighboring communities.</u></p> <p><u>The West Trail runs along the western boundary of the Plan Area, primarily in greenbelts, and connects White Rock Road, International Drive, Sunrise Boulevard, Rio Del Oro Parkway, and Douglas Road. The Park Loop Trail provides internal circulation, connecting the Community Park, neighborhood parks, Regional Town Center, schools and various housing types. The North Trail branches off the West Trail and provides the northern most villages of the Plan Area with a connection to the rest of the bikeway trail system. The Americanos Trail is a north-south trail that will provide connections to the Sunrise-Douglas Plan Area to the south, allowing interconnectivity between uses. The Morrison Creek Trail is the most natural of all of the Class I bicycle trails in the Plan Area and provides the community with a direct link to the Morrison Creek Wetland</u></p>

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	safety standards.		<p><u>Preserve along the southern periphery of the community. While serving as a functional link between the eastern portion of the Plan Area and the Rio Del Oro Trail, the Morrison Creek Trail is intended as a passive recreational amenity that provides miles of scenic open space and wildlife viewing to recreational bicyclists and walkers.</u></p> <p>The RDOSP promotes frequent connections between the Class I system and adjacent uses. Where a single loaded street abuts open space, park or drainage parkway, the Class I path may replace the standard sidewalk on the open space side of the street. Where a cul-de-sac or loop street, multi-family or non-residential use abuts the Class I path, a paved link shall be provided to the path to the extent feasible. The Class I system within an open space area may meander to minimize environmental impacts and create visual interest.</p> <p>Barriers (bollards, rail fence, post and cable, posts, etc.) shall be provided along bike paths adjacent to open space preserve areas regulated by a Section 404 permit issued under the Federal Clean Water Act as shown in Exhibit <u>4-9</u>. Such barriers shall comply with the 404 permit regarding use of the preserve area, and with City design, maintenance and public safety standards.</p>
p. 4-20, § 4.5.3	** § 4.5.3 in old document is § 4.6.2 in new document (no text changes).	p. 4-25, § 4.6.2	** § 4.5.3 in old document is § 4.6.2 in new document (no text changes).
p. 5-5, § 5.3	<p>5.3 WETLAND PRESERVATION AND MITIGATION</p> <p>Although the development of the project will be</p>	p. 5-5, § 5.3	<p>5.3 WETLAND PRESERVATION AND MITIGATION</p> <p>Although the development of the project will be</p>

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	<p>concentrated on the highly disturbed areas that were mined in the 1920s and 1950s, unavoidable impacts to wetland features will occur.</p> <p>A 505-acre preserve area in the southern portion of the site will be created. This area contains the highest concentration of vernal pools on the project site. Over one-half the total acreage of vernal pools are located within the proposed preserve. Other wetland features within the preserve include seasonal wetland swales, seasonal wetlands, ponds, and ephemeral drainages. The majority of Morrison Creek is located within the preserve area. Vernal pool creation (maintaining approximately 250' buffers from existing vernal pool features) will occur within this preserve area also.</p> <p>Mitigation for non-vernal pool wetland habitat impacts will occur within drainage corridors and open space/ detention areas within the project boundaries. Approximately 19.5 acres of seasonal wetland habitat will be constructed within two detention basins that are contiguous with the proposed drainage corridors. Additional wetland habitat will be established within the major drainage corridors on the site. These corridors will contain low flow channels, emergent marsh, and riparian habitat. Assuming an average low flow channel width of 10 feet bordered by 10 feet of associated riparian and/or wetland habitat to each side, the corridors will support approximately 19 acres of wetlands and riparian habitat (6.5 acres of channel, 12.3 acres of riparian/wetland).</p>		<p>concentrated on the highly disturbed areas that were mined in the 1920s and 1950s, unavoidable impacts to wetland features will occur.</p> <p><u>A 507-acre area located in the southern portion of the Project containing the highest quality and density of vernal pools will be set aside as a Wetland Preserve. Within the Wetland Preserve, 20.413 acres of vernal pools, 2.457 acres of seasonal wetland swales, 3.354 acres of seasonal wetlands, 0.616 acre of pond, and 1.889 acres of ephemeral drainage will be preserved. The portion of Morrison Creek located within this area will also be preserved and enhanced. An additional 13.449 acres of vernal pools and 0.752 acres of seasonal wetland swales are proposed to be restored/created within the Wetland Preserve. On-site success monitoring of both preserved and constructed vernal pool habitat within the Wetland Preserve will be conducted for over a ten-year period.</u></p> <p>Mitigation for non-vernal pool wetland habitat impacts will occur within drainage corridors and open space/ detention areas within the project boundaries. <u>The corridors will range from 200 to 300 feet wide and will consist of meandering low-flow channel, adjacent wetlands, riparian plantings, and a bike trail. Approximately 16.941-acres of seasonal wetlands and 8.402-acres of channel/low flow will be created onsite, within the corridors and open space/detention areas.</u></p> <p><u>In addition to the onsite mitigation, there will be two offsite mitigation locations. The 160-acre Cook Property, located south of Highway 16 in Sacramento County, is proposed as additional mitigation for the</u></p>

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			<p><u>Rio del Oro project. The Cook Property is bordered to the north and west by existing conservation properties, to the east by Eagles Nest Road, and to the south by Florin Road. A preliminary wetland assessment conducted by ECORP Consulting, Inc. (ECORP) identified the following wetland habitats on the property; 2.67-acres of vernal pools, 9.90-acres of seasonal marsh, 2.63-acres of seasonal wetland swales (12.53-acres of seasonal wetland) as well as other waters including a 6.51-acre pond and 0.58-acre intermittent drainage (Frye Creek). The remainder of the property includes associated uplands and approximately 21-acres of irrigated pasture. The likelihood of presence of listed vernal pool invertebrates, as well as the property's proximity to other regional conservation areas, makes it ideal to mitigate impacts to biological resources resulting from the Rio del Oro project. A conservation easement will be created for this preserve and managed by Sacramento Valley Conservancy or other conservation oriented third party.</u></p> <p><u>The Rio del Oro project will also purchase 16.666 acres of seasonal wetland habitat at the Clay Station Mitigation Bank located approximately 15 miles south of the Rio del Oro project. These wetlands have been reserved by the project applicants to mitigate for impacts at Rio del Oro. The Rio del Oro project is within the service area of the Clay Station Mitigation Bank.</u></p>
p. 5-5, § 5.4	The following surveys have been conducted in the RDOSP Area to date:	p. 5-6, § 5.4	The following surveys have been conducted in the RDOSP Area to date:

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	<ul style="list-style-type: none"> • Results of Surveys for Special-Status Wildlife Species at the Aerojet Property, Sacramento County, California, Miriam Green Associates, April 1999 • Jurisdictional Delineation Rio del Oro Property, Gibson and Skordal, June 1999 • Listed Vernal Pool Branchiopods Wet Season Survey, Gibson and Skordal, August 2000 • Listed Vernal Pool Branchiopods Wet Season Survey, Gibson and Skordal, July 2001 • Elderberry Survey, Gibson and Skordal, September 2000 • Rio del Oro, Rancho Cordova, California – Rare Plant Survey, ECORP Consulting, Inc., November 2003 • Wetland Delineation, ECORP Consulting, Inc., July 2004 		<ul style="list-style-type: none"> • Results of Surveys for Special-Status Wildlife Species at the Aerojet Property, Sacramento County, California, Miriam Green Associates, April 1999 • Jurisdictional Delineation Rio del Oro Property, Gibson and Skordal, June 1999 • Listed Vernal Pool Branchiopods Wet Season Survey, Gibson and Skordal, August 2000 • Listed Vernal Pool Branchiopods Wet Season Survey, Gibson and Skordal, July 2001 • Elderberry Survey, Gibson and Skordal, September 2000 • <u>Rio del Oro, Rancho Cordova, California – Rare Plant Survey, ECORP Consulting, Inc., August 2003</u> • Rio del Oro, Rancho Cordova, California – Rare Plant Survey, ECORP Consulting, Inc., November 2003 • Wetland Delineation, ECORP Consulting, Inc., July 2004 • <u>Wetland Resource Assessment, ECORP Consulting, Inc., November 2004</u> • <u>Late Season Special-Status Plant Survey, ECORP Consulting, Inc., August 2006</u> • <u>Soil Investigation of Rio del Oro Wetland Preserve, Davis Consulting Earth Scientists, Inc., August 2007</u> • <u>Watershed Analysis of the Hydrologic Function of the Rio del Oro Preserve for Preservation of Existing Wetlands and Construction of Mitigation Wetlands, ECORP Consulting, Inc., September 2007</u>

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p. 5-9, § 5.5, second ¶	<p>Project implementation will also results in impacts to potential habitat for the Federally threatened valley elderberry longhorn beetle. The project site currently supports 329 elderberry shrubs scattered throughout the dredger tailings. Two elderberry preserves (totaling 24 acres) are proposed on the project site. A total of 34 shrubs will be preserved in these areas. The remaining 295 shrubs will be impacted through project implementation. A VELB Mitigation Plan will be developed in consultation with the USFWS that will include onsite preservation, transplantation of impacted elderberries to the preserve areas and other areas as approved by the USFWS.</p> <p>Mitigation for the non-Federally listed species would be determined by the California Department of Fish and Game and local jurisdictions.</p>	p. 5-10, § 5.5, second ¶	<p>Project implementation will also results in impacts to potential habitat for the Federally threatened valley elderberry longhorn beetle. The project site currently supports 329 elderberry shrubs scattered throughout the dredger tailings. <u>An</u> elderberry preserves (totaling <u>12</u> acres) <u>is</u> proposed on the project site. A total of <u>19</u> shrubs will be preserved in <u>this</u> area. The remaining <u>310</u> shrubs will be impacted through project implementation. <u>The current VELB Mitigation Plan proposes to transplant and plant elderberry seedlings and associated plantings per the USFWS Guidelines into the onsite preserves and purchase 449.6 credits at an offsite mitigation bank. There will be eight building phases, starting with phase one, located in the northwestern portion and mid-northern portions of the project. The onsite 12-acre preserve will be established concurrent to Phase One build out. Prior to grading per phase, surveys will be conducted on all areas to be disturbed to identify transplant and mitigation for all impacts. Mitigation for the non-Federally listed species would be determined by the California Department of Fish and Game and local jurisdictions.</u></p>
p. 6-1, § 6.1	<p>... Phasing of infrastructure improvements and funding obligations are detailed in the Public Facilities Financing Plan and the RDO Development Agreements.</p>	p. 6-1, § 6.1	<p><u>...Phasing of infrastructure improvements, detailed in Appendix B, Infrastructure Master Plan, is preliminary based on current standards and policies; and funding obligations, final improvements and phasing will be determined in conjunction with Tier 2 entitlements.</u></p>
p. 6-1, Table 6-1	Sanitary Sewer provider listed as SRCSD/CSD-1	p. 6-1, Table 6-1	Sanitary Sewer provider listed as SRCSD/SASD
p. 6-1, § 6.2	The following section summarizes the information contained within the “ <i>Sewer Master Plan For Rio</i> ”	p. 6-1, § 6.2	The following section summarizes the information contained within the “ <i>Sewer Master Plan For Rio</i> ”

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	<p><i>Del Oro, April 2006</i>” prepared by Wood Rodgers, Inc. This document is part of the technical studies on file prepared in support of the Specific Plan and EIR. The sewer system is designed to be consistent with the General Plan policies and District standards. Rio Del Oro is located within the Sacramento Regional County Sanitation District (SRCSD) and County Sanitation District No. 1 (CSD-1). SRCSD is responsible for the interceptor collection (sanitary sewers which are designed to carry flows in excess of 10 million gallons per day) and treatment of wastewater. CSD-1 is responsible for the local collection facilities including trunk sewers with capacity of 1 million to 10 million gallons per day.</p>		<p><i>Del Oro, April 2007</i>” prepared by Wood Rodgers, Inc. This document is part of the technical studies on file prepared in support of the Specific Plan and EIR. The sewer system is designed to be consistent with the General Plan policies and District standards. Rio Del Oro is located within the Sacramento Regional County Sanitation District (SRCSD) <u>and Sacramento Area Sewer District, formerly county Sanitation District No. 1 (SASD/CSD-1)</u>. SRCSD is responsible for the interceptor collection (sanitary sewers which are designed to carry flows in excess of 10 million gallons per day) and treatment of wastewater. <u>SASD</u> is responsible for the local collection facilities including trunk sewers with capacity of 1 million to 10 million gallons per day.</p>
p. 6-2, § 6.2.2	<p>...The Master Plan also identifies the Mather Interceptor, which would run south of, and tie into, the Bradshaw Interceptor. Recently, SRCSD staff has revisited the usefulness of the Mather interceptor and have determined that it may no longer be a cost effective facility. Staff is currently considering removing it from the SRCSD Master Plan. The SRCSD Master Plan envisioned that prior to construction of the Laguna Creek Interceptor, the Mather interceptor might provide interim service to RDOSP. Since that time, SRCSD has formulated a plan to relocate the Bradshaw Interceptor, and eliminate the Mather interceptor, along a route referred to as the Missile Mather Route. The Aerojet interceptor would still be installed and would tie into the Laguna Creek Interceptor.</p>	p. 6-2, § 6.2.2	<p>...The Master Plan also identifies the Mather Interceptor, which would run south <u>and east</u> of, and tie into, the Bradshaw Interceptor. The SRCSD Master Plan envisioned that prior to construction of the Laguna Creek Interceptor, <u>the Mather interceptor will provide service to RDOSP.</u> The Aerojet interceptor would still be installed and would tie into the Laguna Creek Interceptor.</p>
p. 6-2, § 6.2.2	<p><i>References to CSD-1 in old document changed to SASD/CSD-1 in new document.</i></p>	p. 6-2, § 6.2.2	<p><i>References to CSD-1 in old document changed to SASD/CSD-1 in new document.</i></p>

Table 2-3 Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)			
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p. 6-3, § 6.2.2, fifth ¶	...This exhibit combines the information contained in the SRCSD and CSD-1 Master Plans, the Sunrise Douglas Sewer Master Plan and information made available by the CSD-1 relative to the current plans to obviate the need for a separate Mather interceptor line. This map identifies...	p. 6-3, § 6.2.2, fifth ¶	...This exhibit combines the information contained in the SRCSD and <u>SASD/CSD-1</u> Master Plans, the Sunrise Douglas Sewer Master Plan and information made available by the <u>SASD/CSD-1</u> . This map identifies...
p. 6-3, § 6.2.2, sixth ¶	...The Bradshaw Interceptor is currently scheduled to be online in 2005/2006 up to the west side of the Folsom South Canal...	p. 6-3, § 6.2.2, sixth ¶	...The Bradshaw Interceptor is currently scheduled to be online in <u>2008</u> up to the west side of the Folsom South Canal...
p. 6-6, § 6.3	The following section summarizes the information contained within the “ <i>Rio Del Oro Plan Area Water Supply Master Plan, August 2004</i> ” prepared by Wood Rodgers, Inc. This document is part of the technical studies on file prepared in support of the Specific Plan and EIR. The water system is designed to be consistent with the General Plan policies and Agency standards. Rio Del Oro currently lies outside the SCWA’s existing water service areas and study zones. SCWA will serve as the water wholesaler and California American Water Company (Cal-Am) and Zone 41 will operate and maintain parts of the distribution system in the Plan Area. Proposed water transmission and distribution facilities must be developed in accordance with SCWA’s standards for the water system improvements. Once constructed, the facilities are planned to be annexed into Zone 41.	p. 6-6, § 6.3	The following section summarizes the information contained within the “Rio Del Oro Plan Area Water Supply Master Plan, <u>March 2007</u> ” and the “ <u>Non-Potable Water Study for Rio Del Oro, June 2007</u> ” prepared by Wood Rodgers, Inc. <u>These documents are</u> part of the technical studies on file prepared in support of the Specific Plan and EIR. The water system is designed to be consistent with the General Plan policies and Agency standards. Rio Del Oro currently lies outside the <u>Sacramento County Water Agency’s (SCWA)</u> existing water service areas and study zones. SCWA will serve as the water wholesaler and California American Water Company (Cal-Am) and Zone 41 will operate and maintain parts of the distribution system in the Plan Area. Proposed water transmission and distribution facilities must be developed in accordance with <u>SCWA and Cal-Am</u> standards for the water system improvements. Once constructed, the facilities are planned to be annexed into Zone 41 <u>and Cal-Am.</u>

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p. 6-6, § 6.3.1	<p>...The Sunrise water system is located along Sunrise Boulevard north of Douglas Road.</p> <p>...The Mather Field water system is located...</p>	p. 6-6, § 6.3.1	<p>...The <u>SCWA</u> Sunrise water system is located along Sunrise Boulevard north of Douglas Road.</p> <p>...The SCWA Mather Field water system is located...</p>
p. 6-6, § 6.3.2, first ¶	<p>Montgomery Watson Harza (MWH), under contract to SCWA, prepared the Water System Infrastructure Plan (WSIP) for the Sunrise Corridor/Mather/Sunrise Douglas/Rio Del Oro Area (MWH, April 2004) to serve as a steering document for both SCWA and the development community in the planning, design, and construction of major infrastructure in the Sunrise Douglas, Mather and RDO areas. The WSIP provides the water supply and major water infrastructure requirements to meet build-out requirements of the Rio Del Oro and Sunrise Douglas Community Plan area. In addition, the WSIP produced a water distribution model representative of the build-out condition that is used in this study by adjusting the model to conditions representative of the Rio Del Oro Project. Lastly, the WSIP provides the assumptions needed for the water demand calculations and system design criteria used in this report.</p>	p. 6-6, § 6.3.2, first ¶	<p>Montgomery Watson Harza (MWH), under contract to SCWA, prepared the <u>Zone 40 Water System Infrastructure Plan (WSIP)</u> (MWH, April 2006) to serve as a steering document for both SCWA and the development community in the planning, design, and construction of major infrastructure <u>within Zone 40</u>. The WSIP provides the water supply and major water infrastructure requirements to meet <u>significant milestones in water supply development within Zone 40 and buildout conditions</u>. In addition, the WSIP produced a water distribution model representative of the <u>different phases and the build-out condition that is used by adjusting the model to conditions representative for RDOSP</u>. Lastly, the WSIP provides the assumptions needed for the water demand calculations and system design criteria used in <u>designing the RDOSP water system</u>.</p>
p. 6-7, § 6.3.2, fifth ¶	<p>The water supply source for the RDOSP will be Zone 40's Central (surface) Water Treatment Plant (C-WTP). The C-WTP has multiple contracts for the supply of water. On an average year the C-WTP will have entitlements not exceeding 78,000 AF/year (48,360 gpm). A portion of the entitlements is assumed to be available to serve the Sunrise Corridor/Mather/Sunrise Douglas Service Areas including the RDOSP.</p>	p. 6-8, § 6.3.2, fifth ¶	<p>The water supply source for the RDOSP will be Zone 40's <u>Vineyard</u> (surface) Water Treatment Plant (<u>V-WTP</u>). The <u>V-WTP</u> has multiple contracts for the supply of water. On an average year the <u>V-WTP</u> will have entitlements not exceeding 78,000 AF/year (48,360 gpm). A portion of the entitlements is assumed to be available to serve the Sunrise Corridor/Mather/Sunrise Douglas Service Areas including the RDOSP.</p>

**Table 2-3
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p. 6-12, § 6.4	The following section summarizes the information contained within the “ <i>Master Drainage Study Rio Del Oro, August 2005</i> ” prepared by Wood Rodgers, Inc. This document is part of the...	p. 6-12, § 6.4	The following section summarizes the information contained within the “ <i>Master Drainage Study Rio Del Oro, August 2005</i> ” <u>and the “Addendum”, October 2005, and the “Rio Del Oro: North Offsite Channel Analysis, April 2006</u> prepared by Wood Rodgers, Inc. <u>These documents are part of the ...</u>
p. 6-14, § 6.4.2	<p>The onsite drainage system will include trunk storm drains, drainage parkways, detention basins, and local collection and conveyance infrastructure, Exhibit 6-7.</p> <p>...The goal of these channels is to provide an aesthetically and environmentally preferable alternative to enclosed drainage systems while maintaining effective site drainage. The majority of historical Morrison Creek streambed through the project will be preserved as part of the site development plan. Grading and realignment is required in the eastern open space to contain seasonal flows to an active channel and define the 100- year floodplain in this area.</p> <p>... All runoff from the project will flow through a water quality facility prior to discharge from the site.</p>	p. 6-15, § 6.4.2	<p>The onsite drainage system will include trunk storm drains, drainage parkways <u>including water quality facilities and channels, detention/water quality basins, pump stations</u> and local collection and conveyance infrastructure, Exhibit 6-7.</p> <p>...The goal of these channels is to provide an aesthetically and environmentally preferable alternative to enclosed drainage systems while maintaining effective site drainage <u>and providing water quality facilities</u>. The majority of historical Morrison Creek streambed through the project will be preserved as part of the site development plan. Grading and realignment is required in the eastern open space <u>preserve</u> to contain seasonal flows to an active channel and define the 100- year floodplain in this area.</p> <p>... All runoff from the project will flow through a water quality facility prior to discharge from the site. <u>Exhibit 6-8 depicts a conceptual illustration of the central (6 acre) storm water detention basin which is situated along the primary east – west drainage parkway. Exhibit 6-9 depicts a conceptual illustration of the large (26 acre) storm water detention located in the southwest portion of the Plan Area.</u></p>

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p. 6-14, § 6.4.2, third	The project proposes to include three storm water detention/water quality facilities and online BMP facilities within the drainage parkways. All runoff from the project will flow through a water quality facility prior to discharge from the site.	p. 6-14, § 6.4.2, third ¶	The project proposes to include three storm water detention/water quality facilities and online BMP facilities within the drainage parkways. All runoff from the project will flow through a water quality facility prior to discharge from the site. <u>Exhibit 6-8 depicts a conceptual illustration of the central (6 acre) storm water detention basin which is situated along the primary east-west drainage parkway. Exhibit 6-9 depicts a conceptual illustration of the large (26 acre) storm water detention located in the southwest portion of the Plan Area.</u>
p. 6-16, § 6.6.1	...See Exhibit 6-8 for the anticipated locations of the substations and 6 Kv lines.	p. 6-20, § 6.6.1	...See Exhibit <u>6-10</u> for the anticipated locations of the substations and 6 Kv lines.
p. 7-1, § 7.1	...Phasing and financing obligations relating to public services are outlined in the Public Facilities Financing Plan and in the Implementation and Administration Element, Section 8, of this Specific Plan. Table 7-1 summarizes the public service providers to the Rio Del Oro Plan Area.	p. 7-1, § 7.1	...Phasing and financing obligations relating to public services are outlined in the Public Facilities Financing Plan and in the Implementation and Administration Element, Section 8, of this Specific Plan. <u>Full details of the phasing and funding will be adopted as part of the Tier 2 entitlements.</u> Table 7-1 summarizes the public service providers to the Rio Del Oro Plan Area.
p. 7-1, Table 7-1	Parks and Recreation provider listed as “ Cordova Parks and Recreation District ”.	p. 7-1, Table 7-1	Parks and Recreation provider listed as “ <u>Cordova Recreation and Park District</u> ”.
p. 7-1, § 7.2	Rio Del Oro is located within the Cordova Recreation and Park District (CRPD), which encompasses approximately 75 square miles of land. The RDO Parks and Recreation Master Plan provides for a full range of recreational opportunities including active and passive parks, natural open space and parkway corridors. The parks and open space program is structured to provide a distribution of facilities to meet the needs of future residents of	p. 7-1, § 7.2	Rio Del Oro is located within the Cordova Recreation and Park District (CRPD), which encompasses approximately 75 square miles of land. The RDO Parks and Recreation Master Plan provides for a full range of recreational opportunities including active and passive parks, natural open space and parkway corridors. The parks and open space program is structured to provide a distribution of facilities to meet the needs of future residents of

Table 2-3 Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)			
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	<p>the Plan Area.</p> <p>The City of Rancho Cordova General Plan includes an Open Space, Parks and Trails Element that provides goals, policies and actions aimed at providing an integrated open space system for the community at large. The RDO land use plan complies with the open space element in providing approximately 250 acres of greenbelts, greenways and landscape corridors. The description of each of these elements of open space is described in Section 7.2.2.</p> <p>The CRPD standard for park acreage is 5 acres of active park per 1,000 population. Based on the factors for each type of residential dwelling type, the total parkland required for the Plan Area is 159 acres, as shown in Table 7-2. Exhibit 7-1 designates the specific locations of the major park facilities, providing a total of approximately 170 acres of parkland.</p>		<p>the Plan Area.</p> <p><u>The standards for parks and open space in the City are set forth in the policies in the Open Space, Parks and Trails Element in the City’s General Plan, in standards set forth by CRPD for parks and open space dedication, and in City ordinances implementing park dedication requirements. The combination of these policies is aimed to provide an integrated parks and open space system for the community at large, and includes three parks and open space categories: parks, mandatory open space (MOS) and performance based open space (PBOS). The policies applicable to this project require: (1) five acres of parks per 1,000 residents, comprised of Community Parks and neighborhood parks; (2) 1.75 acres of MOS per 1,000 residents, comprised of (a) .85 acres per 1,000 population of open turf and tree canopy, (b) .40 acres per 1,000 population of community-wide facilities; and (c) .50 acres per 1,000 residents of neighborhood greens. Additional PBOS shall be included in a development project to achieve overall policies of the City as set forth in its General Plan. There is no specified amount of PBOS required for dedication.</u></p> <p><u>The City, CRPD and the developers have implemented the foregoing standards in a manner that meets the requirements, goals and objectives of the General Plan policies, the CRPD requirements and City ordinances. Table 7-2 details the park and open space dedication requirements that shall govern the Rio Del Oro Specific Plan. Table 7-3 provides a summary of the allocation of parks and mandatory</u></p>

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			<p><u>open space provided in the Plan Area.</u></p> <p><u>Exhibit 7-1 designates the specific location of the major park facilities, providing a total of 171.80 acres of active park land. In addition, Rio Del Oro will provide an additional 40 acres for a Sports Park, creating a total of approximately 211.80 acres for active park and recreational facilities in the Plan area. As noted in more detail below, 15.73 acres also is provided for Neighborhood Greens. The total acreage provided in the Rio Del Oro project for park dedication is 227.53 acres, which is 7.31 acres in excess of the applicable park dedication requirements. The allocation of the credit for this excess acreage shall be determined between the City, CRPD and the landowners in appropriate agreements.</u></p>
p. 7-3, Table 7-2	This table has been deleted and replaced.	p. 7-3, Table 7-2	New Table 7-2, Parks and Mandatory Open Space Requirements, inserted.
		p. 7-4, Table 7-3	New Table 7-3, Summary of Provided parks and Mandatory Open Space, inserted.
p. 7-3, § 7.2.1	Active parks include the centrally located Community Park and 8 neighborhood parks.	p. 7-6, § 7.2.1	Active parks include the centrally located Community Park and 9 neighborhood parks.
p. 7-3, § 7.2.1.1	The Community Park will include a wide variety of active, passive and cultural uses. See Exhibit 7-3.	p. 7-6, § 7.2.1.1	<p><u>The Community Park will include a wide variety of active, passive and cultural uses. Exhibit 7-3 depicts the schematic illustration of the Community Park concept, which is subject to revision and refinement.</u></p> <p><u>In addition to the designated Community Park site, the City has identified a potential site for a 40 acre sports park which may be located just north of the Rio Del Oro Community Park on MP parcel 25B. The Specific Plan anticipates the possible future</u></p>

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Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)**

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			<u>decision by the City to locate this new facility on this site by allowing recreation uses as conditionally permitted in the MP district.</u>																																																
p. 7-6, § 7.2.1.2	...Amenities may include open turf-grass play areas, a youth soccer field, picnic area, tot-lot and half basketball court as depicted in Figure 7-4 to the right.	p. 7-9, § 7.2.1.2	...Amenities may include open turf-grass play areas, a youth soccer field, picnic area, tot-lot and half basketball court as depicted in Figure 7-4 to the right. <u>Final park design, amenities and improvements will be determined by CRPD and the City of Rancho Cordova.</u>																																																
p. 7-6, § 7.2.2	<p><i>Section 7.2.2 from old document further divided into two new sections: 7.2.2.1, Mandatory Open Space and 7.2.2.2, Performance Based Open Space.</i></p> <p><i>Section 7.2.2.1, Greenways in old document was converted into a subsection of Section 7.2.2.2, Performance Based Open Space.</i></p> <p><i>7.2.2.2, Paseos/Parkways in the old document is renumbered in the new document to Section 7.2.2.3.</i></p> <p><i>Section 7.2.2.3 Landscape Corridors in old document was converted into a subsection of 7.2.2.3, Paseos/Parkways.</i></p> <p><i>Table 7-3 in old document deleted.</i></p>																																																		
p. 7-11, Table 7-4	<table border="1"> <thead> <tr> <th></th> <th>K-6 (ES)</th> <th>7-8 (MS)</th> <th>9-12 (HS)</th> </tr> </thead> <tbody> <tr> <td>SF/MD</td> <td>9,881</td> <td>9,881</td> <td>9,881</td> </tr> <tr> <td>Student/DU Factor</td> <td>.299</td> <td>.104</td> <td>.107</td> </tr> <tr> <td>Subtotal SF/MD Students:</td> <td>2,954</td> <td>1,028</td> <td>1,057</td> </tr> <tr> <td>HD/VC</td> <td>1,720</td> <td>1,720</td> <td>1,720</td> </tr> <tr> <td>Student/DU Factor</td> <td>.150</td> <td>.052</td> <td>.054</td> </tr> </tbody> </table>		K-6 (ES)	7-8 (MS)	9-12 (HS)	SF/MD	9,881	9,881	9,881	Student/DU Factor	.299	.104	.107	Subtotal SF/MD Students:	2,954	1,028	1,057	HD/VC	1,720	1,720	1,720	Student/DU Factor	.150	.052	.054	p. 7-18, Table 7-4	<table border="1"> <thead> <tr> <th></th> <th>K-6 (ES)</th> <th>7-8 (MS)</th> <th>9-12 (HS)</th> </tr> </thead> <tbody> <tr> <td>SF/MD</td> <td>9,641</td> <td>9,641</td> <td>9,641</td> </tr> <tr> <td>Student/DU Factor</td> <td>.299</td> <td>.104</td> <td>.107</td> </tr> <tr> <td>Subtotal SF/MD Students:</td> <td>2,883</td> <td>1,003</td> <td>1,032</td> </tr> <tr> <td>HD/VC</td> <td>1,960</td> <td>1,960</td> <td>1,960</td> </tr> <tr> <td>Student/DU Factor</td> <td>.150</td> <td>.052</td> <td>.054</td> </tr> </tbody> </table>		K-6 (ES)	7-8 (MS)	9-12 (HS)	SF/MD	9,641	9,641	9,641	Student/DU Factor	.299	.104	.107	Subtotal SF/MD Students:	2,883	1,003	1,032	HD/VC	1,960	1,960	1,960	Student/DU Factor	.150	.052	.054
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	Subtotal HD/VC Students:	258	89	93		Subtotal HD/VC Students:	294	102	91
	Total Student Generation	3,212	1,117	1,150		Total Student Generation	3,177	1,105	1,123
	School Student Capacity:	600	800	2,000		School Student Capacity:	600	800	2,000
	Schools Required:	5.35	1.4	.58		Schools Required:	5.3	1.4	0.5
	Schools Provided:	6	2	1		Schools Provided:	6	2	1
p. 7-9, § 7.4.1	Law enforcement for the Community will be provided entirely by City of Rancho Cordova Police Department. The City’s goal for staffing standards is 1 -officer per 1000 residents and one support staff member for every 3 officers, approximately 34 officers and 40 support staff are required to serve the Community portion of Plan Area.				p. 7-16, § 7.4.1	Law enforcement for the Community will be provided entirely by City of Rancho Cordova Police Department. The City’s goal for staffing standards is <u>1.1</u> officer per 1000 residents and one support staff member for every 3 officers, approximately <u>36</u> officers and <u>12</u> support staff are required to serve the Community portion of Plan Area.			
p. 7-10, § 7.5.1	The Plan Area development will pay fees as part of the Citywide Capital Facilities fee to fund library services. Library is a permitted use in the P/QP land use category.				p. 7-17, § 7.5.1	The Plan Area development <u>will fund its proportional share of library services in the Plan Area.</u> Library is a permitted use in the P/QP land use category.			
p. 8-1, § 8.1	The City of Rancho Cordova is the public agency responsible for the administration the Specific Plan and related documents. The RDOSP shall be implemented consistent with all City rules, regulations and policies.				p. 8-1, § 8.1	The City of Rancho Cordova is the public agency responsible for the administration <u>of</u> the Specific Plan and related documents. The RDOSP shall be implemented consistent with all <u>adopted</u> City rules, regulations and policies.			
p. 8-1, § 8.2	8.2 Subsequent Entitlements Development within the Plan Area is subject to approval of subsequent entitlements by the City. Subsequent approvals may include, but are not limited to, tentative subdivision maps, rezones, conditional use permits, variances, tree permits and design review permits. Individual project				p. 8-1, § 8.2	<u>8.2 Entitlements</u> <u>Development within the Plan Area is subject to approval of subsequent entitlements by the City, and will be governed by a series of development entitlements between the City and the developers. A multi-tier approach to entitlement execution will establish the conditions of an mitigation measures for</u>			

Table 2-3 Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)			
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	applications will be reviewed to determine consistency with the RDOSP and other regulatory documents.		<p><u>Project development. Due to the fact that the limited entitlement does not include overall project conditions and financing, there will be multiple phases, (Tiers) of development entitlements as follows:</u></p> <p><u>Tier 1 Entitlement. (new text added).</u></p> <p><u>Tier 2 Entitlements. (new text added).</u></p> <p><u>Subsequent Entitlements. (new text added).</u></p>
p. 8-1, § 8.2.1	...Application and processing requirements shall be in accordance with the Rancho Cordova Zoning Ordinance and other regulations, unless otherwise modified by this Specific Plan. All subsequent development projects, public improvements and other activities shall be consistent with this Specific Plan, the Specific Plan development agreements , and all applicable City policies, requirements and standards....	p. 8-2, § 8.2.1	...Application and processing requirements shall be in accordance with the Rancho Cordova Zoning Ordinance and other <u>adopted</u> regulations, unless otherwise modified by this Specific Plan <u>or the Tier 1 or Tier 2 Development Agreements</u> . All subsequent development projects, public improvements and other activities shall be consistent with this Specific Plan, the <u>Tier 1 or Tier 2 Development Agreements</u> , and all <u>adopted</u> City policies, requirements and standards....
p. 8-2, § 8.3	<p>During the long-term build-out of the Rio Del Oro Plan Area, amendments to the adopted Specific Plan may be necessary because of changing circumstances. Additionally, because of unforeseen circumstances, some design guidelines or development standards may not be feasible on a particular parcel. In these situations, the procedures listed below will be followed to amend the adopted Specific Plan.</p> <p>Typically, property owners will request amendments to a Specific Plan. There may also be circumstances where the City may wish to request an amendment to</p>	p. 8-3, § 8.3	<p>During the long-term build-out of the Rio Del Oro Plan Area, amendments to the adopted Specific Plan may be necessary because of changing circumstances. Additionally, because of unforeseen circumstances, some design guidelines or development standards may not be feasible <u>to implement</u> on a particular parcel. In these situations, the procedures listed below will be followed to amend the adopted Specific Plan.</p> <p>Typically, property owners will request amendments to a Specific Plan. There may also be circumstances where the City may wish to request an amendment to</p>

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Page/Reference	Old Text	Page/Reference	New Text
	the Plan. For example, the City may propose an amendment to the Plan to address shifting land use patterns outside the Plan Area.		the Plan. For example, the City may propose an amendment to the Plan to address shifting land use patterns outside the Plan Area. <u>Any proposal by the City to amend the RDOSP will follow procedures set forth in the Tier 1 Development Agreement.</u>
p. 8-2, § 8.3.1	Any proposed amendments to the Specific Plan can include, but are not limited to changing land use designations, design criteria, development standards or policies. Amendments to this adopted Specific Plan shall be categorized by the Planning Director as either an amendment or an administrative modification . Modifications Amendments will require Planning Commission and City Council approval. Modifications Amendments may be reviewed and acted upon by the Planning Director or Zoning Administrator with no Planning Commission or City Council review, unless appealed. Application filing fee and a detailed justification statement which explains in detail why an amendment or administrative modification to the Specific Plan is warranted, and any exhibits deemed necessary by the Planning Director shall be submitted with the request to amend the plan . All requirements of CEQA will be applicable.	p. 8-3, § 8.3.1	Any proposed <u>changes</u> to the Specific Plan can include, but are not limited to changing land use designations, design criteria, development standards or policies. <u>Changes proposed</u> to this adopted Specific Plan shall be categorized by the Planning Director as either an amendment or minor revision. Amendments will require Planning Commission and City Council approval. <u>Minor revisions</u> may be reviewed and acted upon by the Planning Director or Zoning Administrator with no Planning Commission or City Council review, unless appealed. Application filing fee and a detailed justification statement which explains in detail why an amendment or <u>minor revision</u> to the Specific Plan is warranted, and any exhibits deemed necessary by the Planning Director shall be submitted with the request to <u>change</u> the <u>Specific Plan</u> . All requirements of CEQA will be applicable.
p. 8-3, § 8.3.1.1	Second bullet: <ul style="list-style-type: none">• Significant changes to the distribution of land uses beyond that allowed by Section 3.8 Minor Density Adjustments or other changes affecting land use are proposed which may substantially affect the <u>Specific Plan</u>.	p. 8-3, § 8.3.1.1	Second bullet: <ul style="list-style-type: none">• Significant changes to the distribution of land uses beyond that allowed by Section 3.8 Minor Density Adjustments or other changes affecting land use are proposed which may substantially affect <u>the Project Purpose and Objectives as set forth in this Specific Plan</u>.

Table 2-3 Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)			
December 2006 Version		October 2009 Version	
Page/Reference	Old Text	Page/Reference	New Text
	<p>Fifth bullet:</p> <ul style="list-style-type: none"> Any change proposed to the Plan, which could significantly increase environmental impacts or other changes determined to be significant by the Planning Director. 		<p>Fifth bullet:</p> <ul style="list-style-type: none"> Any change proposed to the Plan, which could significantly increase environmental impacts <u>beyond the levels determined as significant in the certified Final Environmental Impact Report.</u>
p. 8-3, § 8.3.1.2	<p>8.3.1.2 Administrative Modification</p> <p>An administrative modification shall be allowed when one of the following criteria is met:</p> <ul style="list-style-type: none"> The Planning Director determines that the modification does not have a significant impact on the character of the Plan. The proposed adjustments to the development standards or design guidelines are offset by the merits of the design and do not significantly change the anticipated physical characteristics of the development. The proposed changes to the alignment of arterial streets, which if adopted, would not substantially alter the land use or circulation concepts set forth in this Specific Plan. The proposed changes to the alignment of collector or secondary streets maintain the general land use pattern. Adverse environmental impacts are not significantly increased by the proposal. The proposed change to the approved Phasing Plan will not result in an increase in the total number of units proposed for a particular phase. The request is in compliance with Minor Density Adjustments. 	p. 8-4, § 8.3.1.2	<p><u>8.3.1.2 Minor Revisions</u></p> <p><u>A minor revision shall be permitted if authorized under the criteria set forth in the Zoning Code, included but not limited to the following:</u></p> <ul style="list-style-type: none"> <u>Requests for an adjustment that are 30% or less of quantifiable or measureable standards contained in the Specific Plan or Development Standards or Design Guidelines.</u> <u>Requests for an adjustment that the Planning Director determines do not have a significant impact on the character of the Plan as set forth in the Project Purpose, Guiding Principles and Objectives of this Specific Plan and the proposed adjustments to the development standards or design guidelines are offset by the merits of the design and do not significantly change the anticipated physical characteristics of the development.</u> The proposed changes to the alignment of arterial streets, which if adopted, would not substantially alter the land use or circulation concepts set forth in this Specific Plan. The proposed changes to the alignment of collector or secondary streets maintain the general land use pattern.

Table 2-3 Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)			
December 2006 Version		October 2009 Version	
Page/Reference	Old Text	Page/Reference	New Text
			<ul style="list-style-type: none"> • <u>The proposed changes do not significantly increase any environmental impacts that were determined to be significant in the certified Final Environmental Impact Report.</u> • <u>The proposed change to the approved Phasing Plan will not result in an increase in the total number of units proposed for the entire Plan Area.</u> • The request is in compliance with Minor Density Adjustments.
p. 8-3, § 8.4	<p>The RDOSP provides for a comprehensively planned infrastructure system with coordinated phasing and construction of facilities. A total of 5-phases are proposed in the RDOSP. Phase 1 has 4 sub-phases and additional sub-phases are anticipated to occur with in the other phases of the Plan Area. The geographic boundaries of each phase are reflected on Exhibit 8-1, with land use by phase summarized in Table 8-1.</p> <p>Infrastructure requirements for each phase of development include all on-site backbone infrastructure and off-site facilities necessary for each phase to proceed. The City may require through Specific Plan conditions, map conditions or</p> <p>Development Agreement, provisions that offsite improvements are necessary or beneficial in conjunction with a particular phase of development. Included infrastructure improvements are roadway, sewer, water, recycled water, storm drainage, dry utility, recreation, school and other facilities and improvements. Development will occur by phase in sequential order. The opportunity exists for certain parcels to move forward out of sequence, subject to</p>	p. 8-4, § 8.4	<p>The RDOSP provides for a comprehensively planned infrastructure system with coordinated phasing and construction of facilities. A total of <u>9</u>-phases are proposed in the RDOSP. The geographic boundaries of each phase are reflected on Exhibit 8-1. <u>The On-Site Rio Del Oro Infrastructure Phasing Plan is provided in Appendix B, which includes a listing, by phase, of improvements and specific details relating to those improvements.</u></p> <p><u>Infrastructure requirements for each phase of development include all on-site infrastructure necessary for each phase to proceed. The City shall approve a single Phasing Master Plan prior to or contemporaneous with the approval of any Tier 2 Entitlements. The City will require, through map conditions and/or Tier 2 Development Agreement provisions, those off-site improvements which are necessary or beneficial in conjunction with a particular phase of development in order to implement the provisions of the Phasing Master Plan.</u></p> <p><u>The improvements and requirements described in Appendix B are based on the City standards and policies in effect at the time of this Specific Plan</u></p>

**Table 2-3
Summary of Changes to the Rio del Oro Specific Plan (Prepared by the City of Rancho Cordova)**

December 2006 Version		October 2009 Version	
Page/Reference	Old Text	Page/Reference	New Text
	<p>review and approval of the City. Once development is initiated, some phases may have reduced infrastructure requirements if improvements are provided in an earlier developed phase.</p> <p>A full listing of improvements, and specific details relating to those improvements, are included in the Specific Plan development agreements. All in-tract sewer, storm drain, water and dry utilities will be installed as part of individual project improvements.</p>		<p><u>approval. Notwithstanding anything in Appendix B to the contrary, should any of such City standards and/or policies change in the future, then these improvements and requirements may also change. Furthermore, these improvements and requirements may change as provided in the future Phasing Master Plan and/or the Tier 2 Entitlements, the terms of which shall prevail in the event of any inconsistency with the On-Site Infrastructure Phasing Plan.</u></p>
p. 8-5, Table 8-1	<i>Table 8-1 was deleted and does not appear in the new document.</i>		
p. 8-7, § 8.5		p. 8-7, § 8.5	<i>Section 8-5 was completely revised and expanded.</i>
Source: Data provided by City of Rancho Cordova in 2009			

3 MASTER RESPONSES

This chapter presents responses to common environmental issues raised in multiple comments. These have been termed “master responses.” They are identified by topic so that reviewers can readily locate all relevant information pertaining to an issue of concern. When issues are addressed in the broader context provided by master responses, the interrelationships between some of the individual issues raised can be better clarified. It is also possible to provide a single explanation of an issue that is more thorough and comprehensive than separate, narrowly focused responses without any context. Because it avoids unnecessary repetition of information, use of master responses also streamlines the FEIR/FEIS. Chapter 4 of this FEIR/FEIS contains the comment letters and responses to specific comments received on the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS for the Rio del Oro Specific Plan.

MASTER RESPONSE 1: ADEQUACY OF LONG-TERM WATER SUPPLY

A number of commenters have expressed concern regarding the termination of the agreements between Sacramento County Water Agency (SCWA) and Aerojet and the Boeing Company relating to the provision of Groundwater Extraction and Treatment (GET) water and the effect of the termination on the availability of the long-term water supply for the project. As discussed in the 2008 Recirculated Draft EIR/Supplemental Draft EIS (2008 RDEIR/SDEIS), the long-term water for the project consists of two supplies: 1,500 acre-feet per year (afy) provided through SCWA conjunctive-use supplies (which include surface water entitlements and groundwater) and 7,391 afy from the more than 15,000 afy of GET water. Aerojet currently extracts and treats contaminated groundwater at various GET facilities at or near its property in eastern Sacramento County. The GET facilities are operated under one or more 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 (DTSC). The directives require extraction of contaminated groundwater; treatment of the groundwater; and appropriate discharge of treated groundwater, principally to the American River. In addition, since preparation of the 2008 RDEIR/SDEIS, the design flow for the GET facilities discharging to the American River has been increased to more than 20,000 afy.

The more than 15,000 afy of GET water that is currently discharged to the American River by Aerojet is available for diversion. Under a 2003 agreement between Aerojet and SCWA, SCWA was authorized to make such a diversion at the Freeport Regional Water Project (FRWP) on the Sacramento River. The agreement granted to SCWA the GET water discharged to the American River, and in exchange for this water, among other matters, SCWA agreed to provide replacement water to Golden State Water Company (GSWC) and Cal-American Water Company (Cal-Am) through a replacement water supply project (the Eastern Sacramento County Replacement Water Supply Project [RWSP]) and to provide water for development for the Aerojet properties (including Rio del Oro) in excess of the replacement water-supply obligations. (*Agreement Between Sacramento County, the Sacramento County Water Agency, and Aerojet General Corporation with Respect to Groundwater and Related Issues within the Eastern Portion of Sacramento County* [August 27, 2003]) (Aerojet-SCWA Agreement). The Aerojet-SCWA Agreement allowed either party to terminate the agreement if SCWA has not certified the FEIR for the RWSP and approved the RWSP by a specified date. The specified date passed, and SCWA opted to terminate the agreement. SCWA and Aerojet have entered into a new 2010 Agreement under which Aerojet is transferring 8,900 afy of GET water to SCWA. Under the 2010 Agreement, SCWA acknowledges that the 8,900 afy will provide SCWA with sufficient available water to supply the Project, and SCWA shall further confirm this fact in writing to the City. The 8,900 afy along with other available Zone 40 water (including the 1,500 afy provided through SCWA conjunctive-use supplies) is sufficient to meet the Project demand of 8,891 afy. The amount of water available under the 2010 agreement – 8,900 afy – is sufficient for build-out for the entire project, even if the 1,500 afy expected through the SCWA conjunctive-use supplies, for whatever reason, do not become available as expected.

Additionally, there are two other GET facilities (also under environmental agency oversight) that presently discharge to Morrison Creek but that can, through construction of new pipelines, discharge to the American River. One of the GET facilities discharging to Morrison Creek is operated by McDonnell Douglas Corporation (MDC)/Boeing, which, along with Aerojet, is obligated to remediate groundwater migrating from portions of property formerly owned by MDC/Boeing and currently owned by Aerojet. SCWA also entered into an agreement with MDC/Boeing under which SCWA would be granted GET water from the facility that MDC/Boeing operates allocable to MDC/Boeing (*Agreement Between Sacramento County, the Sacramento County Water Agency, and McDonnell Douglas Corporation with Respect to Groundwater and Related Issues within the Eastern Portion of Sacramento County* [August 29, 2003]) (MDC-SCWA Agreement). The MDC-SCWA Agreement contained a different termination clause, and that agreement was terminated because SCWA did not approve the RWSP by the date specified in that agreement. It is important to note that the termination of the MDC-SCWA Agreement does not affect the water available to serve the Rio del Oro project because the additional GET water contemplated under the MDC-SCWA Agreement is not necessary to serve the project. (See 2008 RDEIR/SDEIS, page 3.5-7.)

Notably, although SCWA did not approve the RWSP, as discussed on page 3.5-7 of the 2008 RDEIR/SDEIS, the Rio del Oro project would not rely on the RWSP for water. The RWSP DEIR describes the 15,000 afy of GET water that is available for diversion at the FRWP; however, this 15,000 afy is already being discharged to the American River and is separate and apart from any additional GET water that would be developed under the RWSP. The approval and construction of the RWSP, therefore, is not required to ensure that GET water is available for the Rio del Oro development. As discussed above, the water needed to supply the project (8,891 afy) would come from the 8,900 afy of GET water that Aerojet is making permanently available to SCWA under the 2010 Agreement and other available Zone 40 water (including the 1,500 afy provided through SCWA conjunctive-use supplies).

Because Aerojet is already discharging the 15,000 afy of GET water to the American River, the 2008 RDEIR/SDEIS acknowledges that, in the event the 2003 agreement between Aerojet and SCWA is terminated, this GET water could be made available to SCWA at FRWP through implementation of the Aerojet-County Agreement, a modified agreement, or a *new* agreement. (See 2008 RDEIR/SDEIS, page 3.5-7.) Such a diversion strategy is impliedly permitted under the 2010 Agreement. As Aerojet and SCWA have entered into the 2010 Agreement, the termination of the 2003 agreement, does not undermine the analysis in the 2008 RDEIR/SDEIS, which demonstrates a reasonable likelihood of adequate long-term water supply (i.e., that future water sources will be available) for the project pursuant to the holding in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 432 (“future water supplies identified and analyzed must bear a likelihood of actually proving available”). In fact, the 2010 Agreement strengthens the conclusion reached in the 2008 RDEIR/SDEIS, as the Agreement specifically identifies the Rio del Oro project as a recipient of up to 8,900 afy of this GET water, and requires SCWA to further confirm in writing that the transfer of the GET water will provide SCWA with sufficient available water to supply Rio del Oro.

MASTER RESPONSE 2: DISAGREEMENT REGARDING THE CONCLUSIONS REACHED IN THE DEIR/DEIS

The State CEQA Guidelines and the NEPA regulations require that decisions regarding the significance of environmental effects addressed in an EIR and an EIS be based on substantial evidence. The State CEQA Guidelines recognize that other evidence suggesting a different conclusion may exist. The 2006 DEIR/DEIS provides a comprehensive evaluation of the project’s environmental impacts in compliance with CEQA, the State CEQA Guidelines, the NEPA regulations, and in accordance with the professionally accepted methodology for evaluating impacts on environmental resources. The 2006 DEIR/DEIS, the 2008 RDEIR/SDEIS, and this FEIR/FEIS present substantial evidence to support the conclusions drawn within these documents regarding the significance of the project’s environmental effects. Under CEQA, when commenters disagree about environmental conclusions, the EIR need only summarize the main points of disagreement and explain the lead agency’s reasons for accepting one set of judgments instead of another. Section 15151 of the State CEQA

Guidelines states, “Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.” See also *Greenbaum v. City of Los Angeles* (2nd Dist. 1984) 153 Cal.App.3d 391, 413 (200 Cal.Rptr. 237) and *Browning-Ferris Industries v. City Council* (6th Dist. 1986) 181 Cal.App.3d 852, 862–863 (226 Cal.Rptr. 575). Similarly, under NEPA, when commenters disagree with environmental conclusions, the lead agency must “identify opposing views found in the comments such that differences of opinion are readily apparent,” and the agency must provide a “good faith, reason[ed] analysis in response.” See *State of California v. Block*, 690 F.2d 753 (9th Cir. 1982). The lead agencies will ultimately determine which conclusion is appropriate, based on the substantial evidence presented in the EIR/EIS and other documents in the whole of the record.

The comment letters and responses to them present summaries of the areas of disagreement. In some cases, there is no substantial evidence offered by commenters to support a different conclusion. For this reason, no further response to disagreements presented in the comment letters is necessary. If evidence is provided by the commenter to support the disagreement with the EIR/EIS’s conclusion, the evidence is summarized and considered in making the EIR/EIS’s conclusion. The City of Rancho Cordova (City) and USACE will review and consider all the substantial evidence in the whole of the record in making their decisions about the project and its environmental effects.

MASTER RESPONSE 3: COMMENTS OUTSIDE THE CEQA PUBLIC REVIEW PERIOD

A number of comments received during the public comment period for the 2008 RDEIR were submitted based on information contained in the 2006 DEIR, not the 2008 RDEIR. The notice of availability for the 2008 RDEIR stated that pursuant to procedures set forth in Section 15088.5(f)(2) of the State CEQA Guidelines, reviewers should limit their comments to the materials contained in the RDEIR. The notice of availability further stated that the City (as CEQA lead agency) would only respond to comments on the 2006 DEIR that were received during the initial circulation period of the 2006 DEIR, and to comments received during the recirculation period that relate only to the portions of the 2008 RDEIR that were revised.

Therefore, pursuant to State CEQA Guidelines Section 15088.5(f)(2), those comments received during the public comment period for the 2008 RDEIR that pertain to information contained only in the 2006 DEIR are outside the scope of the documents identified in the 2008 RDEIR notice of availability for which comments were invited. As a result, no response by the City (as CEQA lead agency) is required. However, the City has responded in an effort to promote full discussion and disclosure of environmental issues associated with the project.

Note that under NEPA, USACE continues to accept public and agency comments on the EIS throughout the course of the environmental document, regardless of the public comment period dates.

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4 COMMENTS AND INDIVIDUAL RESPONSES

4.1 INTRODUCTION

This chapter contains the comment letters received on the December 2006 draft environmental impact report/draft environmental impact statement (2006 DEIR/DEIS) and the April 2008 recirculated DEIR/supplemental DEIS (2008 RDEIR/SDEIS) for the Rio del Oro Specific Plan project. Following each comment letter are individual responses to those comments not addressed in Chapter 3, “Master Responses.” Section 4.2 describes the format of the responses to comments. Commenters on the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS, their associated agencies, and assigned letter identifications are listed in Section 4.3. Section 4.4 presents the comment letters received on the 2006 DEIR/DEIS and comments made during the public hearing on the project held January 11, 2007, and the responses to those comments that are not addressed in master responses. Each comment contained in the comment letter is summarized in *italics* at the beginning of each comment response in Section 4.4. Section 4.5 presents the comment letters received on the 2008 RDEIR/SDEIS and comments made during the public hearing on the project held May 22, 2008, and the responses to those comments that are not addressed in master responses.

4.2 FORMAT OF COMMENTS AND RESPONSES

Comment letters and responses to comments are arranged in the following order:

- ▶ Section A: Federal Agencies
- ▶ Section B: State Agencies
- ▶ Section C: Regional and Local Agencies
- ▶ Section D: Others
- ▶ Section E: Commenters at the Public Hearing

Each letter and each comment within a letter have been given an identification number. Responses are numbered so that they correspond to the appropriate comment. Where appropriate, responses are cross-referenced between letters or with a master response.

4.3 LISTS OF COMMENTERS

4.3.1 COMMENTERS ON THE 2006 DEIR/DEIS

Table 4-1 provides a list of all agencies and persons who submitted comments on the 2006 DEIR/DEIS and who commented on that document during the public hearing.

Table 4-1 List of Commenters on the 2006 DEIR/EIS				
Commenter	Agency	Date	Letter ID	Page Number
Section A: Federal Agencies				
Susan K. Moore, Field Supervisor	U.S. Fish and Wildlife Service	February 12, 2007	USFWS	A1-1
Laura Caballero, Environmental Specialist	U.S. Bureau of Reclamation	February 5, 2007	Reclamation	A2-1
Patricia Sanderson Port, Regional Environmental Officer	U.S. Department of the Interior, Office of the Secretary, Office of Environmental Policy and Compliance	February 5, 2007	USDI	A3-1
Nova Blazej, Manager, Environmental Review Office	U.S. Environmental Protection Agency, Region IX	February 15, 2007	EPA	A4-1
Section B: State Agencies				
Kevin Boles, Environmental Specialist, Rail Crossings Engineering Section, Consumer Protection and Safety Division	California Public Utilities Commission	December 18, 2006	CPUC	B1-1
Bridget Binning, Environmental Review Unit	California Department of Health Services	December 21, 2006	DHS	B2-1
Sandy Hesnard, Aviation Environmental Specialist	California Department of Transportation, Division of Aeronautics	January 2, 2007	Aero	B3-1
Terry Roberts, Director, State Clearinghouse	Governor's Office of Planning and Research	January 23, 2007	SCH	B4-1
Alexander MacDonald, Senior Engineer	California Regional Water Quality Control Board, Central Valley Region	February 2, 2007	CVRWQCB-1	B5-1
Greg K. Vaughn, Senior Engineer, Storm Water/Water Quality Certification Unit	California Regional Water Quality Control Board, Central Valley Region	February 6, 2007	CVRWQCB-2	B6-1
Bruce De Terra, Office Chief, Office of Transportation Planning—South	California Department of Transportation, District 3—Sacramento Area Office	February 9, 2007	Caltrans	B7-1
Section C: Regional and Local Agencies				
City-required revisions to the 2006 DEIR/DEIS	City of Rancho Cordova	No date	City	C1-1
Helen Lu and Jose Ramirez, Senior Civil Engineer	Sacramento Regional County Sanitation District	No date	SRCSD1	C2-1

**Table 4-1
List of Commenters on the 2006 DEIR/EIS**

Commenter	Agency	Date	Letter ID	Page Number
Don Lockhart, Assistant Executive Officer	Sacramento Local Agency Formation Commission	December 14, 2006	LAFCo	C3-1
Matthew G. Darrow, Senior Civil Engineer	County of Sacramento, Department of Transportation	December 15, 2006	DOT	C4-1
George H. Booth, Senior Civil Engineer	Sacramento County Department of Water Resources	January 26, 2007	SCDWR1	C5-1
Joseph J. Hurley, Assistant Air Quality Planner Analyst	Sacramento Metropolitan Air Quality Management District	January 29, 2007	SMAQMD	C6-1
John Kilpatrick, P.E., Senior Planning Engineer	California American Water Company	January 29, 2007	Cal-Am	C7-1
Geri Wickham, Planning/Project Manager	Folsom Cordova Unified School District	January 29, 2007	FCUSD	C8-1
Daniel Jones, Assistant Engineer II	Sacramento County Water Agency	January 31, 2007	SCWA	C9-1
J. Glen Rickelton, Airport Noise Officer	Sacramento County Airport System	February 1, 2007	SCAS	C10-1
Traci Canfield, Planner	Sacramento Regional Transit District	February 2, 2007	RT	C11-1
Robert Sherry, Planning Director	Sacramento County Planning and Community Development	February 5, 2007	ComDev	C12-1
Michael Meyer, CSD-1/SRCSD Policy and Planning	Sacramento Regional County Sanitation District	February 9, 2007	SRCSD2	C13-1
Mark Rains, Associate Civil Engineer	Sacramento County Department of Water Resources	February 12, 2007	SCDWR2	C14-1
Section D: Others				
Thomas W. Smith, P.E., G.E., Manager—Sacramento Office, Water Resources/Geotechnical Engineer	Ayres Associates	January 26, 2007	Ayres	D1-1
Carol W. Witham	California Native Plant Society	February 1, 2007	CNPS	D2-1
James G. Moose, Attorney at Law	Remy, Thomas, Moose, and Manley, LLP	February 5, 2007	RTMM	D3-1
Alta Tura	Habitat 2020	February 5, 2007	Habitat	D4-1
Florence M. LaRiviere, Chairperson	Citizens Committee to Complete the Refuge	February 9, 2007	Citizens	D5-1
Section E: Commenters at the Public Hearing				
Alex MacDonald	California Regional Water Quality Control Board, Central Valley Region	January 11, 2007	Hearing	E1-1
Alta Tura	Habitat 2020	January 11, 2007	Hearing	E2-1

Table 4-2 provides a list of all agencies and persons who submitted comments on the 2008 RDEIR/SDEIS during the public review period and who commented on that document during the public hearing.

Table 4-2 List of Commenters on the 2008 RDEIR/SDEIS				
Commenter	Agency	Date	Letter ID	Page Number
Section A: Federal Agencies				
Nova Blazej, Manager, Environmental Review Office	U.S. Environmental Protection Agency, Region IX	July 11, 2008	EPA-R	RA1-1
Section B: State Agencies				
Alexander McDonald, Senior Engineer	California Regional Water Quality Control Board, Central Valley Region	June 13, 2008	CVRWQCB-R	RB1-1
Kim F. Wilhelm, P.E., Northern California Regional Engineer, Drinking Water Field Operations Branch, Division of Drinking Water and Environmental Management	California Department of Public Health	May 22, 2008	DHS-R	RB2-1
Section C: Regional and Local Agencies				
Robert Sherry, Planning Director	Sacramento County Planning and Community Development	July 7, 2008	ComDev-R	RC1-1
J. Glen Rickelton, Manager, Planning & Environment	Sacramento County Airport System	June 20, 2008	SCAS-R	RC2-1
Sarena Deeble, P.E., Policy and Planning	Sacramento Regional County Sanitation District	June 16, 2008	SRCSD-R	RC3-1
John Coppola, Principal Civil Engineer	Sacramento County Water Agency	July 3, 2008	SCWA-R	RC4-1
Salam A. Khan, P.E., Development Services	Sacramento Area Sewer District	May 8, 2008	SASD-R	RC5-1
Kamal Atwal, P.E., T.E., Associate Transportation Engineer	Sacramento County Department of Transportation	April 30, 2008	DOT-R	RC6-1
Traci Canfield, Planner	Sacramento Regional Transit District	June 12, 2008	RT-R	RC7-1
Sandra Hamameh	Sacramento Housing Alliance	July 7, 2008	SHA-R	RC8-1
Section D: Others				
Carol W. Witham	California Native Plant Society	May 28, 2008	CNPS-R	RD1-1
William D. Kopper	William D. Kopper, Attorney at Law	June 18, 2008	Kopper-R	RD2-1
Joshua Basofin, California Representative	Defenders of Wildlife	July 7, 2008	DOW-R	RD3-1
Section E: Commenters at the Public Hearing				
Kim Wilhelm	California Department of Public Health	May 22, 2008	T-DHS	RE1-1

4.4 COMMENTS AND RESPONSES ON THE 2006 DEIR/DEIS

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SECTION A

Federal Agencies



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:
1-1-07-I-0580

FEB 12 2007

Anna Sutton
U.S. Army Corps of Engineers
1325 J Street, Room 1480
Sacramento, California 95814-2922

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

Subject: Comments on the U.S. Army Corps of Engineers' and the City of Rancho Cordova's December 8, 2006, Draft Environmental Impact Report/ Environmental Impact Statement for the Proposed Rio del Oro Specific Plan Project, Sacramento County, California

Dear Ms. Sutton and Mr. Angell:

The U.S. Fish and Wildlife Service (Service) has reviewed the U.S. Army Corps of Engineers' (Corps) and the City of Rancho Cordova's (City) December 8, 2006, Rio del Oro Specific Plan Draft Environmental Impact Report/ Environmental Impact Statement (DEIR/S). The DEIR/S has been prepared as part of the Corps' and City's consideration of the Rio del Oro Specific Plan proposal (proposed project), which would permit a mixed-use development on approximately 3,829 acres in Rancho Cordova. At issue are the effects of the proposed project on federally listed species, including the valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) (beetle), vernal pool fairy shrimp (*Branchinecta lynchi*), vernal pool tadpole shrimp (*Lepidurus packardii*), and conservancy fairy shrimp (*Branchinecta conservation*) (vernal pool crustaceans), Sacramento Orcutt grass (*Orcuttia viscida*), slender Orcutt grass (*Orcuttia tenuis*), and California tiger salamander (*Ambystoma californiense*). This letter is provided pursuant to the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) (Act).

TAKE PRIDE
IN AMERICA 

Description of the Proposed Action

The proposed project site is located south of White Rock Road, north of Douglas Road, and east of Sunrise Boulevard. The proposed project site is situated directly north and west of the Sunrise Douglas Community Plan Area boundary.

Elliot Homes and GenCorp Realty Investments, LLC (project proponents) propose to develop a master-planned community consisting of high-, medium-, and low-density residential housing, retail and commercial space, an office park, schools, a 507-acre wetland "avoided area", and recreational and drainage-corridor open space (drainage parkway). The proposed project is made up of five phases which, upon completion, will urbanize 3,297 acres and result in the fill of approximately 45.4 acres of wetlands and waters. Phase I would develop approximately 1,115 acres of the western side of the proposed project site. Phase II would develop approximately 639.5 acres of the north central portion of the proposed project site and establish a 14-acre beetle open space/ preserve. Phase III would develop approximately 611 acres of the south central portion of the proposed project site and include the establishment of 129 acres of the wetland avoided area. Phase IV would develop approximately 521 acres in the northeast portion of the proposed project site and establish a 10-acre beetle open space/ preserve. Phase V would develop 942 acres in the southeast portion of the proposed project site and establish 378 acres of the wetland avoided area.

The Service previously issued two letters to the Corps and the project proponents stating our concerns with the proposed project. The Service has met with the project proponents four times to further explain our concerns. A summary of these letters and meetings follows.

Background Summary

On March 6, 2003, the project proponents and their consultants met with representatives of the Service, Corps, and California Department of Fish and Game (CDFG) to discuss the proposed project. The Service expressed to the project proponents and consultants the inadequacy of the preserve design in achieving the protection and preservation of habitat for listed species. The Service reiterated these concerns in a March 27, 2003, meeting at the proposed project site with the project consultant.

The Service received a request from the Corps on October 2, 2003, to initiate formal section 7 consultation on the proposed project. The Service issued a letter to the Corps on October 31, 2003, requesting 17 items of additional information needed to conduct formal consultation on the proposed project (Service file number 1-1-04-I-0143). The letter also identified Service concerns regarding placing Jaeger Road through the proposed wetland avoided area, the risk of transplanting elderberry shrubs into or from contaminated soil, and the risk to listed species from the flood corridor (drainage parkway) being too narrow and an unmanageable source of introduction of weedy and invasive plant species. On February 13, 2004, the Service received a document, prepared by ECORP Consulting. This document, dated February 12, 2004, responded to the Service's October 31, 2003, letter and provided some additional information about the

proposed project. The Service determined that the additional information was not adequate and did not satisfy the Service's request.

On May 5, 2005, representatives of the Service met with the project consultant to discuss a strategy to update and revise the elderberry shrub stem counts. In an electronic mail (email) to the project consultant on June 3, 2005, the Service explained that the project design did not avoid impacts, would result in reduction of upland supporting the hydrology of the system, would result in the loss of uplands that support pollinators, and did not meet Service preservation goals for the listed species. The Service also reiterated the recent habitat losses to the listed species under consideration and stated that the preservation of remaining vernal pool grassland complexes is essential for the conservation of vernal pool species. On June 15, 2005, the Service emailed representatives of the Corps and the Environmental Protection Agency (EPA), reiterating the lack of conservation incorporated into the Rio del Oro project, which proposed the loss of greater than 60 percent of the existing vernal pools on-site.

The Service met the project proponents and their consultant on July 20, 2005, to discuss the proposed project. On September 6, 2005, the Service issued a letter to GenCorp, reiterating key points and recommendations from this meeting (Service file number 1-1-05-TA-1699). This letter further summarized Service input from prior meetings, restating the inadequacy of the proposed compensation to conserve and protect listed species, recommending measures that could be implemented to be more protective of on-site resources, requesting that the project be modified to conform with recent consultations and conservation needs of the species, requesting updated calculations to adequately reflect on-site conditions, requesting a plan on the management of the preserve areas, and restating the insufficiency of the effects analysis and the plant surveys.

On January 31, 2006, the Service received a letter from the project proponents, rebutting the Service's September 6, 2005, letter. On April 25, 2006, the Service issued a draft non-jeopardy biological opinion on the proposed project to the Corps (Service file number 1-1-06-I-1108).

Analysis of Effects

The project would result in substantial effects to listed species and their habitats, through direct (including interrelated and interdependent), indirect, and cumulative impacts. These future projects may adversely affect several federally-listed species, including the vernal pool crustaceans, the beetle, the California tiger salamander, the Sacramento and slender Orcutt grasses, as well as the giant garter snake (*Thamnophis gigas*) and the California red-legged frog (*Rana aurora draytonii*).

Vernal Pool Crustaceans

The proposed project site contains approximately 69.5 acres of wetlands, of which 35.5 acres are vernal pools. At least 30.3 acres of wetlands would be filled by project development, including 17.3 acres, or nearly 49 percent, of the onsite vernal pools.

The proposed project includes the establishment of a 507-acre wetland "avoided area" on the southern portion of the project site. This area of the project site has remained relatively undisturbed in comparison to other portions of the site, although, according to the DEIR/S (page 1-2), numerous buildings, roads, and structures associated with the prior use remain on the site today, primarily in the southern/central portion of the proposed project site. In addition, a security facility intrudes on the lower southeastern edge of the proposed avoided area (although not identified as part of the project), and the Service estimates that approximately 40 acres of infrastructure (roads, parking lots, outbuildings) from the facility are within the avoided area. In total, the 507-acre avoided area, which would include just 13 percent of total proposed project site, would preserve approximately 26.2 acres of wetlands, including 18.2 acres, or nearly 51 percent, of onsite vernal pools. Further, approximately 36.7 acres of wetlands, including 17.9 acres of vernal pools, would be created or restored in the wetland avoided area.

The DEIR/S does not adequately analyze the indirect effects of the proposed project on vernal pool species. The analysis should include an examination of the following potential indirect effects on vernal pool crustaceans and listed plants:

Alternation of site hydrology: The hydrology of the site will be significantly altered by the proposed project. The proposed project would significantly increase the amount of impervious surface on the project site, reducing and preventing natural percolation through the soils and significantly increasing runoff and storm flows. While the proposed project includes the installation of an on-site conveyance and detention treatment systems, the creation of impervious surface across 49.2 percent of the project site would result in significant effects to on-site wetlands and vernal pool crustacean habitat through the alteration of the hydrologic regime.

Although the DEIR/S concludes that the groundwater table would not be "appreciably changed," the groundwater table is expected to be six feet higher in the long term as a result of the proposed project, due to "the introduction of new, project-related surface-water supplies and the associated increase in percolation of seasonal applied landscape irrigation water" (DEIR/S 3.4-29). The increased water table could result in perennially flooded wetlands.

The proposed project, in concert with other related developments in the project vicinity (e.g., the proposed Easton project, the Sunrise Douglas Master Planned Community, Zinfadel Villages), would "change the amount and timing of potential waste discharges in stormwater runoff to Morrison Creek and other drainage courses on-site from existing conditions," including a greater quantity of urban runoff (DEIR/S 3.4-33). Urban runoff changes the hydroperiod of vernal pools, so that they become inundated during hot summer months when they would naturally have remained dry, precluding the life cycle of vernal pool crustaceans.

Erosion and sedimentation: As stated on page 3.4-23 of the DEIR/S, the proposed project would result in "substantial construction-related alteration of drainages," thereby contributing to increased soil erosion and storm water discharges of suspended solids and increased turbidity. Siltation and sediment dumping in pools supporting vernal pool crustaceans are likely to result in decreased cyst viability, decreased hatching success, and decreased survivorship among early life history stages, thereby reducing the number of mature adults in future wet seasons. In general,

increased amounts of sediment can reduce the richness and density of invertebrates and alter their species composition (Sheldon *et al.* 2003).

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2 cont.

Contaminant runoff: The project may increase the amount of human-related disturbance on vernal pool crustacean habitats within and adjacent to the proposed project action area. Most adverse impacts to vernal pool species habitat are human-related, particularly the overland runoff of contaminants such as petroleum products, pesticides, herbicides, fertilizers, soap, and other hazardous materials—all of which, if conveyed into vernal pool crustacean habitats, could adversely affect the listed vernal pool crustaceans and/or their cysts and their habitats. Contaminant runoff can be expected to reduce water quality of wetlands by altering their dissolved-oxygen content, temperature, pH, suspended sediment and turbidity levels, and nutrient content, and result in reduced fitness to vernal pool crustaceans through physiological stress or a reduction in their food base due to the presence of these chemicals (Sheldon *et al.* 2003). Recent research further suggests that pyrethroid insecticide use in residential developments will cause toxicity, and even mortality, to aquatic species (Weston *et al.* 2005).

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Loss of habitat and ecosystem function: The Service expects that the loss of supporting upland vernal pool grasslands will lead to a loss of habitat and ecosystem function. One of the upland attributes that contributes to the diversity of vernal pools is the diversity of insect pollinators, which may nest and over-winter near the edges of vernal pools or in the driest upland areas. Loss of pollinator habitat in the upland areas, by grading and constructing vernal pools in their habitat, is expected to result in the loss of diversity within the vernal pools.

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Loss of Ecosystem Connectivity: The Service expects that the loss of connectivity between the proposed project site and adjacent habitat disrupts the episodic connectivity that is needed to sustain the metapopulations of vernal pool crustaceans in Sacramento County.

Although it is expected that the project proponents will implement Best Management Practices for hydrologic and storm water features to decrease the potential indirect effects on wetlands, the DEIR/S states (pages 3.10-40) that “the purpose of establishing the wetland preserve is to preserve and enhance the existing wetland function and value; however, there are no assurances that this goal can be achieved and given the large anticipated increase in urbanization on the adjacent land, indirect impacts on potential habitat for federally listed vernal pool invertebrates is expected.” While the Service recognizes that careful and diligent preserve management, as well as on-going education and remediation efforts, are necessary components of maintaining the future integrity of the wetland avoided area, the Service is doubtful that the wetland avoided area will effectively preserve vernal pool species habitat in perpetuity and contribute to the recovery of these listed species. The Service has not reviewed and evaluated any plan for the management and maintenance in perpetuity of the proposed wetland avoided area, as one has not been provided by the project proponents.

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The project, as proposed, would preserve just 51 percent of on-site vernal pools. In order to be consistent with biological opinions the Service has recently issued for projects in the SunRidge Specific Plan area located immediately south of the proposed project and with the Service’s 2005 *Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon*, the preservation

of vernal pool habitat to offset direct and indirect effects to these habitats resulting from the proposed project should follow a conservation strategy that strives to preserve approximately 75 to 85 percent of the on-site vernal pools. Otherwise, the project proponents should provide an explanation of how the proposed vernal pool crustacean conservation strategy will adequately compensate for loss of vernal pool shrimp habitat in a core recovery area for the species. The current proposal proposes habitat preservation and creation levels that are below those of the Service's programmatic biological opinion for small projects, which is woefully inadequate to offset effects from a large project, such as the proposed Rio del Oro project.

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5 cont.

Valley Elderberry Longhorn Beetle

Approximately 329 elderberry shrubs (*Sambucus* species), which are the obligate host plant for the beetle, are located on the proposed project site. Many of these shrubs have evidence of beetle exit holes. The proposed project would result in the loss of approximately 16.5 acres of elderberry savannah. Two open space/ preserves, one 10-acre and one 14-acre, are proposed in order to preserve 38, or twelve percent, of the on-site elderberry shrubs. The remaining on-site elderberry shrubs (approximately 291) would be transplanted into the open space/ preserve areas prior to site grading. In addition, approximately 2,088 elderberry seedlings and approximately 3,988 associated native plants would be established within the two open space/ preserve areas and along the approximately 155 acres of proposed drainage parkways. The 22 elderberry shrubs in the proposed 14-acre open space/ preserve area would have to be replanted because the majority of the shrubs would be displaced because of dump closure activities at White Rock Dump No. 1 (DEIR/S 3/10-33). [See discussion below: "Mining and Remedial Activities".]

The most recent survey of elderberry shrubs on the proposed project site was conducted nearly seven years ago. In order to adequately evaluate the effects of the proposed project on the beetle, the Service requires an updated survey, providing a re-calculated estimate of the number of onsite elderberry shrubs and stem classes which are present on the proposed project site.

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The Service believes that the nature and type of the edge effects would change with the construction of residential development adjacent to beetle habitat. For example, the Service is aware of numerous problems that arise in managing a beetle habitat preserve (in perpetuity) that is adjacent to residential developments, including invasive, non-native plants becoming established in beetle habitat preserves, encroachment by neighboring residents who have placed bark mulch, decomposed granite, drainage pipes, and ornamental plants into the conservation areas, pesticide runoff from adjacent residential properties, and the influx of the Argentine ant into the conservation areas as a result of nursery plantings in residential developments. The DEIR/S states (pages 3/10-41) that "relocating the [elderberry] shrubs to land designated as Open Space/Preserve would not be expected to result in any measurable benefit to the species because the conservation areas would eventually be surrounded by development and isolated from larger areas of potential habitat. Further, there are no assurances that the open space/ preserve lands would be managed in a manner that would promote the long-term viability of the shrubs." While the Service recognizes that careful and diligent preserve management, as well as on-going education and remediation efforts, are necessary components of maintaining the future integrity of beetle habitat conservation areas that are adjacent to residential developments, the Service is

doubtful that the open space/ preserve areas will effectively preserve beetle habitat in perpetuity and contribute to the recovery of this listed species. The Service has not reviewed and evaluated any plan for the management and maintenance in perpetuity of all proposed elderberry shrub open space/ preserve areas, as one has not been provided by the project proponents.

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6 cont.

Federally-listed Plants

Two occurrences of the endangered Sacramento Orcutt grass (*Orcuttia viscida*) are located in the Anatolia Preserve, which is immediately south of the proposed project; these occurrences are in a drainage that was once contiguous with the swales on the project site. Two occurrences of the threatened slender Orcutt grass (*Orcuttia tenuis*) are in the vicinity of the proposed project: one is located approximately 0.8 miles southeast of the intersection of Sunrise Boulevard and Douglas Road, adjacent to Rio del Oro on the southern edge of the proposed project site, and the other is 0.2 miles east of Rio del Oro.

The DEIR/S indicates, on page 3.10-11, that these two federally-listed plants are unlikely to occur on the project site as these species were not found during special-status plant surveys conducted on the project site in 2003. As twice previously requested by the Service in its October 2, 2003, and September 6, 2005, letter, an additional year of special-status plant surveys should be conducted to assist the Service to determining whether or not these species are present onsite. The survey reports must include the areas of the proposed project site that were surveyed, dates of the survey, the locations of reference sites which were used to determine the phenology of species in the area, and the names and resumes of biologists conducting the survey. The November 18, 2003, *Rio del Oro, Rancho Cordova, California—Rare Plant Survey* report does not identify the localities of the reference sites and the species which were observed at these sites. Nor does this report provide the resumes of the five biologists who conducted the plant surveys.

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Therefore, due to the hydrological connection of this site to occupied habitat (e.g., the slender Orcutt grass is found in a swale that crosses onto the site, on the west side of the project, and is also found in a swale that flows from the site on the south side of the project), the Service does not accept the May 2003 survey results as definitive.

Analysis of Alternatives

The DEIR/S proposes two main alternatives: the high density alternative and the impact minimization alternative. The Service recommends that the analysis of alternatives include an examination of increasing the density of residential development and reducing the project footprint. For example, the proposed high density alternative as compared to the preferred alternative demonstrates an increase in residential density (from 11,601 units to 15,488 units) on a similar size project footprint; however, an analysis should be conducted to maintain a high density development at 11,601 units on a smaller project footprint in order to avoid and minimize the effects to listed species and their habitats.

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Under the impact minimization alternative, the project components would be reconfigured and the level of residential development would be reduced so that an additional 485 acres in the southern portion of the project site would be designated as part of the wetland avoided area, thereby protecting approximately 994.5 acres, or 25 percent, of the proposed project site within the avoided area. Under this alternative, approximately 26.4 acres of wetlands would be filled, and 43.1 acres of wetlands would be preserved. The impact minimization alternative would affect considerably less vernal pool species habitat by incorporating an additional 439.2 acres of grassland habitat, which supports vernal pools, into the proposed wetland avoided area. This alternative would provide additional protection to the vernal pools and wetlands in the avoided area because the width of the buffer between the urban development and the most important vernal pool and seasonal wetland habitat would increase (DEIR/S 3.10-42).

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The impact minimization alternative is most consistent with the Service's recommendations. In our various meetings and letters, we have recommended additional onsite avoidance of onsite vernal pool species habitat. Under the preferred alternative, the Service does not believe that the proposed project would result in preservation of vernal pool crustacean habitat at a rate that leads to sustainability and recovery of the species. The impact minimization alternative, however, would more closely approach the Service's recovery strategy for listed vernal pool species.

The Service recommends that additional consideration be given to the construction of roads through the wetland avoided area and the exploration of alternate routing or design of roads which, as currently proposed, would bisect the proposed wetland avoided area. Rancho Cordova Parkway (Jaeger Road) and Americanos Boulevard would be constructed through the middle of the proposed wetland avoided area, effectively dividing the avoided area into three pieces totaling 336 acres, 129 acres, and 42 acres. The preferred alternatives includes the construction of three pre-cast, culvert, con-span design bridges, spanning Morrison Creek and the on-site avoided area. As we have stated in meetings and letters, the Service is concerned that the construction of these roads through the proposed wetland avoided area compromises the integrity of the avoided area and would allow additional impacts through runoff from the road and fragmentation of the watershed.

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Road location and construction, and the subsequent urbanization that results from new roads, are known to significantly alter habitat structure, water chemistry, flow regime, biotic interactions, and the overall integrity of habitat (Angermeier *et al.* 2004). Maintenance activities and vehicular traffic contribute to the build up of complex chemical residues on roads, some of which are known to accumulate in stream sediments (Van Hassel *et al.* 1980) and disperse into groundwater (Van Bohemen and Janssen van de Laak 2003). Chemical contamination is likely to result in acute and chronic sub-lethal (*e.g.*, behavior, growth, reproduction) effects (Angermeier *et al.* 2004). One study demonstrated that significant ecological effects of roads on wetland habitat can extend out at least 328 feet and up to 1,969 feet from the edge of the roadway (Forman and Deblinger 2000; Sheldon *et al.* 2003). Thus, it seems certain that the construction of a road through the proposed on-site wetland avoided area is likely to significantly diminish the function and value of the habitat that is avoided.

Similarly, the Service recommends that roads not be constructed through the drainage parkways, which will accommodate some of the elderberry shrubs transplants, elderberry seedlings, and associated native plants. Roads result in habitat fragmentation as well as direct and indirect effects associated with roads, including chemical runoff and pollution, dust and particulate matter pollution, modification of site hydrology, and invasive species. The function and value of the beetle habitat in the preserve network should not be compromised by roads, residential developments, and use activities. Nonetheless, the Service believes that the beetle habitat open space/ preserve designs should incorporate larger tracts of beetle habitat that are buffered from surrounding residential development and resident access.

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Finally, the Service recommends widening the proposed drainage parkways along the reconstructed channels to 400 feet to facilitate the control of weedy plant species that will invade from the surrounding development and to provide adequate buffer to any wildlife in these corridors from disturbance. This is consistent with the buffer placed on Morrison Creek in the adjacent Sunrise Douglas area projects.

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Discrepancies

Page 2-42 states that "all or portions of the wetland preserve would be created during Phase 1, depending on [Corps] section 404 Clean Water Act permit requirements" while Table 2-1 on page 2-14 indicates that portions of the wetland preserve would be established during Phases III and V. It is the Service's position that a conservation easement be established over the entire proposed preserve network prior to ground-breaking on the proposed project. This would be consistent with a conservation strategy for the entire site, and would better support the function and integrity of the total preserve.

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Mining and Remedial Activities

Mining activities, which include the removal of dredge tailings, are currently being conducted by Teichert Aggregates, Inc. on the western portion of the project site. These activities are expected to expand to other portions of the project site. This would serve an economic benefit to GenCorp; further, aggregate mining may be instrumental in contouring the landscape to level the site's topography. As described on page 2-57 of the DEIR/S, the mining activities have undergone or will undergo separate environmental evaluations independent of the proposed project. As noted on page 2-67 of the DEIR/S, mining activities will not disturb any land within a 50-foot radius of an elderberry shrub and will not disturb land within a 250-foot radius of a vernal pool. Although the Service recognizes that the landscape on the proposed project site has already been highly modified and that buffers between sensitive resources and the mining activities will be established, the Service is nonetheless opposed to mining activities occurring within proposed preserves, particularly when those activities are likely to adversely affect listed species.

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There are several areas within the proposed project site that are designated as hazards or hazardous materials sites due to residual mercury, asbestos, lead, soil, and groundwater contamination. Each of these sites is subject to remedial action, including soil and groundwater

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treatment and construction of the proposed project, except for Phase I which has already been cleared, could not occur until investigation and remediation of contaminants in soil and soil vapor have satisfied State requirements. Many of these sites, including the 30-acre Kappa/Gamma complex, the nearly 2-acre 'metal lined hole,' the 50-acre Alpha Complex are wholly or partially within the proposed wetland avoided area. In addition, the 5-acre White Rock Dump No. 1 is proposed as one of the beetle habitat open space/preserves. The drainage parkways would be constructed through other hazard sites, including the 120-acre Beta Complex. The Service expects that it will evaluate the effects of these remedial actions on federally-listed species through a separate formal consultation process.

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14 cont.

Conclusion


Based on our review of the DEIR/S, we reiterate our concerns, expressed previously in our letters and meetings, that the proposed project would result in significant effects to federally-listed species and compromise the recovery of these species. The Service requests written notification regarding any proposed actions and pending decision regarding the proposed project. Notification can be submitted to the Service at the letterhead address.

Thank you for the opportunity to review this project. As the Service has repeatedly stated in correspondence and in person, we are concerned about the effects of the proposed project on the listed species. The DIER does not adequately address the effects of the proposed project on the vernal pool crustaceans, the beetle, and federally-listed plants, in particular. We remain committed to working with the Corps and the project proponents to ensure that the proposed development adequately protects these listed species.

Please contact Holly Herod, the Sacramento Valley Branch Chief, or Kelly Fitzgerald of the Service at (916) 414-6645 if you have any questions or concerns regarding this letter.

Sincerely,



 Susan K. Moore
Field Supervisor
U.S. Fish and Wildlife Service

cc:

Tim Vendlinski, U.S. Environmental Protection Agency, Region IX, San Francisco, CA
Kent Smith, California Department of Fish and Game, Rancho Cordova, CA
Bjorn Gregerson, ECORP Consulting, Inc., Roseville, CA

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The comment states that the hydrology of the site will be significantly altered by an increase in impervious surfaces. The comment also raises issues regarding indirect impacts on vernal pool crustaceans and protected plants, impacts from changes in groundwater levels, and impacts on Morrison Creek from project and cumulative development.

This comment was addressed on pages 3.10-25 and 3.10-44 of the 2008 RDEIR/SDEIS. Drainage and hydrology impacts are analyzed in Section 3.4 of the 2006 DEIR/DEIS, and impacts on the proposed on-site vernal pool preserve are analyzed in Section 3.10. (2006 DEIR/DEIS, page 3.10-25.) The following information describes those analyses.

The wetland preserve has been configured to preserve the hydrologic integrity of the vernal pools and crustacean habitat. A hydrologic analysis of the topography of the preserve area using Light Detection and Ranging (LIDAR) was used to establish the preserve boundary, maintaining a buffer of 250 feet from the proposed development, and maintaining the watersheds necessary to support preserved habitat. Using the LIDAR technology, ECORP Consulting, Inc. (ECORP) biologists, hydrogeomorphologists, and geographic information system (GIS) technicians mapped the microwatersheds of vernal pools and other wetlands within the preserve (2008 RDEIR/SDEIS, Appendix Q, as updated in 2009 and shown in Chapter 5 of this FEIR/FEIS). Using the resulting data, they determined that the mean watershed size required for each acre of vernal pool at Rio del Oro is approximately 7.14 acres.

The analysis suggests that the proposed Rio del Oro preserve could accommodate and support an additional 50 acres of vernal pool habitat. However, the project proposes to construct only 13.5 acres of vernal pool habitat within the 507-acre preserve. Further GIS analysis will be conducted and historic topography, historic aerial photography, and the results of a soils investigation will be reviewed in an effort to refine the restoration and construction of this habitat so that each wetland feature would be supported by a large enough watershed. The results of this analysis will dictate the optimal location of the proposed vernal pools, ensuring that they would not replace more upland watershed area than required to sustain the existing depressional wetlands. A total of 30 historic preserved vernal pools would be used as reference vernal pools for the vernal pool compensatory mitigation and would be monitored along with the constructed and other historic features in the area.

The LIDAR analysis was also used to analyze the effects of the proposed Rancho Cordova Parkway and Americanos Boulevard on existing and proposed habitat within the preserve. The analysis indicated that the proposed road does not compromise any vernal pools' watershed to the point that it does not retain a watershed/wetland acreage ratio of 7.14:1, with the exception of one small vernal pool (0.053 acre). Although the mean watershed ratio for all vernal pools was calculated at 7.14:1, further analysis shows that wetlands of this size class require a watershed ratio of approximately 3.26:1. The proposed alignment of Rancho Cordova Parkway maintains a watershed ratio of 6.62:1 for this particular pool and greater than 7.14:1 for all other pools downstream of the road; therefore, the proposed Rancho Cordova Parkway and Americanos Boulevard alignments should not adversely affect existing or proposed vernal pool habitat.

The project is designed to direct summer flows to the drainage corridors that would be created throughout the project. These drainage corridors include water quality treatment swales and basins to treat stormwater and summer flows before flows are released into the proposed created low-flow channels and adjacent wetland habitat. Increased flows caused by an increase in impervious surfaces would be directed to these drainage corridors and would not enter Morrison Creek anywhere upstream of the proposed vernal pool preserve. The portion of Morrison Creek that would receive increased runoff is downstream of the vernal pool preserve. From the project site, Morrison Creek flows directly into Mather Lake on the west of Sunrise Boulevard. There are no off-site vernal pools downstream of the proposed preserve that would be adversely affected by increased runoff. The on-site vernal pool preserve would not receive any summer nuisance flows.

The project applicant(s) propose to construct detention basins to attenuate runoff flows to predevelopment levels. Because detention basins have been incorporated into the project design, peak-flow rates would not increase. Urban runoff would be treated as required by state and local stormwater quality standards in the detention basins and drainage channels proposed to be constructed within the project site. Incorporating low-impact development features, along with the required water quality features, would aid in reducing flows to near natural conditions. Therefore, indirect effects on the hydrology of off-site waters, such as Mather Creek, would also be minimized.

The 2008 RDEIR/SDEIS acknowledges that vernal pools and other wetland habitat types within the proposed preserve and on adjacent parcels could be adversely affected by habitat fragmentation and indirect impacts resulting from the proposed construction of 13.5 acres of vernal pools proposed as part of the project applicant(s)' wetland mitigation and monitoring plan (MMP). (2008 RDEIR/SDEIS, page 3.10-27.) The 2008 RDEIR/SDEIS also acknowledges that the effects of habitat fragmentation can extend beyond the boundaries of an area proposed for development.

The proposed residential development would include various low-impact development design features, including bioretention ponds and vegetated swales for water quality treatment, pervious strips, and permeable pavements. This treated, mitigated flow would enter Morrison Creek near the proposed Americanos Boulevard. The residential area is relatively small in relation to this watershed (approximately 3%), and the proposed low-impact development features, water quality ponds, and retention/detention ponds required by local agencies would be implemented. As a result, the LIDAR analysis for the project indicates that the peak flows, runoff volumes, and runoff durations of the wetland preserve area would likely not be changed substantially.

The proposed construction design includes the use of Con-Span[®] bridge systems as natural-substrate span crossings over Morrison Creek. The Con-Span bridge consists of two small footings on each side of the spanned area and a long overhead arch that would bridge the delineated wetland. No improvements within the spanned area are required. These natural-substrate span crossings would also allow wildlife movement and minimize habitat fragmentation. Properly sized Con-Span bridge crossings allow for more natural flows of stormwater while allowing wildlife movement under roadways. Therefore, Rancho Cordova Parkway and Americanos Boulevard would cross Morrison Creek with a clear span of the delineated wetlands within the channel bank and would not change the direction of drainage flows or alter the hydrology in the area.

Most of the runoff from Rancho Cordova Parkway would be discharged from the wetland preserve to the north and south through sloped gutters. The remainder, collected from the

central portion of the road, would drain into a bioswale for water quality treatment before being released into the proposed wetland preserve (2008 RDEIR/SDEIS, Exhibit 3.10-4).

The existing Morrison Creek watershed at Douglas Road is approximately 1,830 acres. This watershed consists of approximately 1,003 acres upstream of the Rio del Oro western project boundary and 827 acres on-site. There are scattered areas of mine tailings in this watershed, although most of the tailings exist outside this watershed to the north.

The project would preserve most of the on-site watershed as part of the preserve area, with the exception of approximately 53 acres of proposed residential development and construction of approximately 3,000 feet of Americanos Boulevard perpendicular to Morrison Creek across the proposed preserve area near the eastern boundary. The watershed shape and size would not change significantly from the existing conditions on-site, and this project would not change the watershed off-site. The project would modify 60 acres of the 1,830-acre watershed area, or approximately 3% of the total watershed area.

The proposed development would include various design features characteristic of low-impact development, including water quality ponds, and retention or detention ponds for water quality, peak-flow control, and volume control to maintain flow regime and water chemistry of Morrison Creek at predevelopment levels. The connection to Morrison Creek to the southwest of the project site would be maintained, the creek would be maintained in its existing condition through most of the project site, and most of the on-site watershed would be preserved. Drainage pipe systems would discharge runoff into the created drainage parkways with vegetated water quality swales. Stormwater detention basins would be used to store stormwater and attenuate peak flows. Therefore, project construction is not expected to adversely affect downstream flows on Morrison Creek. For these and the many other reasons discussed in the preceding paragraphs, project development is not expected to result in a cumulatively considerable incremental contribution to significant cumulative regional impacts on Morrison Creek that could affect habitat quality for organisms that live in the creek or connected downstream wetlands and other waters.

In addition, proposed mitigation measures would minimize impacts to the extent feasible. Mitigation Measure 3.10-1a requires the project applicant(s) to obtain all necessary permits under Sections 401 and 404 of the Clean Water Act (CWA) or the state's Porter-Cologne Water Quality Control Act (Porter-Cologne Act). As part of that process, the mitigation measure commits the project applicant(s) to replace, restore, or enhance on a "no net loss" basis all wetlands and other waters of the United States or waters of the state that would be lost or degraded as part of the project. Aquatic habitat shall be restored, enhanced, and/or replaced at an acreage and location and by methods agreeable to the U.S. Army Corps of Engineers (USACE), the Central Valley Regional Water Quality Control Board (Central Valley RWQCB), and the City of Rancho Cordova (City) as appropriate. See the wetland MMP (Appendix Q of the 2008 RDEIR/SDEIS, as updated in 2009 and attached to this FEIR/FEIS).

Mitigation Measure 3.10-1b in the 2008 RDEIR/SDEIS requires the project applicant(s) to submit drainage plans for review and approval. The mitigation measure includes several performance standards designed to minimize impacts on the preserved wetlands and other waters of the United States. The project applicant(s) must minimize erosion and runoff into Morrison Creek and all wetlands and other waters of the United States that would remain on-site. Appropriate runoff controls would be implemented to control siltation and potential discharge of pollutants. The mitigation measure also commits the

project applicant(s) to establishing baseline conditions and developing a monitoring program and standards to ensure that the performance standards are met.

The comment also states that the increased water table could result in perennially flooded wetlands.

The change in groundwater levels described in the 2006 DEIR/DEIS would not result in perennial flooding in the vernal pool preserve because groundwater levels would not reach the wetlands. The current depth to groundwater typically ranges between 50 feet and 160 feet below the current ground surface. Implementing the Proposed Project Alternative would raise the groundwater level by 6 feet in the long term. As set forth in the 2008 RDEIR/SDEIS, “the estimated changes in the depth to groundwater as a result of project implementation would be minimal and well within the existing range of natural seasonal variations” (2008 RDEIR/SDEIS, page 3.10-28).

USFWS-2

The comment states that “substantial construction-related alteration of drainages” can result in decreased cyst viability, decreased hatching success, and decreased survivorship for vernal pool species.

This comment is addressed on pages 3.10-27 and 3.10-28 of the 2008 RDEIR/SDEIS.

Mitigation Measure 3.4-3 of the 2006 DEIR/DEIS requires preparation of a storm water pollution prevention plan that would minimize construction-related stormwater impacts on the preserve area. In addition, Mitigation Measure 3.10-1b of the 2008 RDEIR/SDEIS requires the project applicant(s) to minimize erosion and runoff into Morrison Creek and all wetlands and other waters of the United States that would remain on-site, as described in response to comment USFWS-1.

The wetland preserve has been designed to maximize protection of existing and compensatory vernal pool habitat. Drainage would be designed to direct summer nuisance flows to low-flow channels that would be constructed along the perimeter of the preserve and parallel a proposed trail system. The preserve configuration is also designed to maintain existing hydrology in preserved and compensatory vernal pool habitat. Development areas adjacent to the preserve generally flow away from the preserve and would not compromise the hydrology of the protected resources. Drainage studies prepared for the project and submitted show that urban stormwater would not flow to the wetland preserve.

See response to comment USFWS-1 for a discussion of the hydrology in the vernal pool preserve area and proposed mitigation.

USFWS-3

The comment states that overland runoff of contaminants could adversely affect the vernal pool crustaceans in the vernal pool preserve area.

This comment is addressed on pages 3.10-26 and 3.10-44 of the 2008 RDEIR/SDEIS. As described above, urban runoff from the project would be directed to the proposed drainage corridors and would not enter Morrison Creek anywhere upstream of the proposed vernal pool preserve, except where noted in response to comment USFWS-1. Implementation of Mitigation Measure 3.10-1b in the 2008 RDEIR/SDEIS would further minimize this impact. See also response to comment USFWS-1 for a description of the LIDAR analysis conducted for the project, method of directing runoff away from the proposed preserve, and explanation of the use of bioswales and water quality treatment ponds to ensure that runoff would be treated before entering the proposed preserve.

USFWS-4

The comment states that the U.S. Fish and Wildlife Service (USFWS) expects that the loss of supporting upland vernal pool grasslands will lead to a loss of habitat and ecosystem function.

The proposed 507-acre preserve would contain approximately 432 acres of supporting upland grassland habitat surrounding approximately 75 wetted habitat acres when the project is completed. No adverse impacts are anticipated from implementation of the on-site vernal pool compensatory mitigation. The proposed vernal pool restoration and creation plan has been designed in consultation with USFWS staff. Vernal pool habitat that is evident in historic aerial photographs would be restored in their original locations and compensatory habitat would occur on appropriate soils located 200 feet away from existing features, where possible. The proposed compensatory habitat has also been analyzed using ArcGIS software tools and a LIDAR-derived topographic model (see response to comment USFWS-1). This analysis confirms that the microwatersheds for all preserved wetlands would be maintained and hydrological functions would not be altered. This analysis is the same analysis that USFWS has recently required at other approved vernal pool compensation sites and mitigation banks. Therefore, impacts on habitat and ecosystem function would be minimized. It is acknowledged, however, on page 3.10-65 of the 2008 RDEIR/SDEIS that removing approximately 3,300 acres of potential habitat for special-status wildlife, and the associated habitat fragmentation, could potentially contribute to the decline of vernal pool branchiopods, valley elderberry longhorn beetle (VELB), Swainson's hawk, and western spadefoot toad populations in the region. It is also acknowledged on page 3.10-71 of the 2008 RDEIR/SDEIS that the loss of nearly 1,500 acres of annual grassland habitat would contribute substantially to the regional loss of this biological resource that provides important functions to special-status plant and animal species.

USFWS-5

The comment states that USFWS expects the loss of connectivity between the proposed project site and adjacent habitat to disrupt the episodic connectivity that is needed to sustain the metapopulations of vernal pool crustaceans in Sacramento County.

The project has been designed to allow connections to existing conservation areas and/or proposed conservation areas to the maximum extent possible. The properties located south of the proposed project site, south of Douglas Road (i.e., Anatolia) have been permitted and approved, and do not offer any possible open space connections. As explained in the 2008 RDEIR/SDEIS, the proposed wetland preserve would connect to the conservation area identified in the advisory document *A Conceptual-Level Strategy for Avoiding, Minimizing, & Preserving Aquatic Resource Habitat in the Sunrise-Douglas Community Plan Area* (June 2004), developed by the U.S. Environmental Protection Agency (EPA), USFWS, and USACE, adjacent to the east of the project site, just north of the proposed North Douglas Road. As stated previously, the 2008 RDEIR/SDEIS acknowledges that habitat fragmentation resulting from the Rio del Oro project could potentially contribute to the decline of vernal pool branchiopods, leading to the conclusion in Impact 3.10-4 that the impact on special-status wildlife species would remain significant and unavoidable even after mitigation.

The comment also recommends a conservation strategy that strives to preserve approximately 75%–85% of the on-site vernal pools in order to be consistent with the Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon (Recovery Plan) and recent biological opinions issued for the projects in the SunRidge Specific Plan area.

The Recovery Plan addresses 33 plant and animal species that occur exclusively or primarily within a vernal pool ecosystem. The overall goals of the Recovery Plan are to achieve and protect in perpetuity self-sustaining populations of the vernal pool species, provide for delisting of 20 federally listed plant and animal species, and ensure the long-term conservation of the 13 species of special concern. (Recovery Plan, page viii.)

The project site is within the Mather core area of the Southeastern Sacramento Valley vernal pool region. The Recovery Plan designates the Mather core area as a “Priority 1” area. Core areas were identified as Priority 1 in cases where they were occupied by very narrowly endemic species (with few populations and narrow or disjunct distributions that are known to be, or are likely to be, genetically or ecologically distinct) or where the core area supported a high diversity of the species covered by the plan. The Mather core area is listed as a Priority 1 area because of the presence of Sacramento Orcutt grass and a “high number of rare species in the area.” The Recovery Plan lists Sacramento Orcutt grass, slender Orcutt grass, vernal pool fairy shrimp, and vernal pool tadpole shrimp as listed species that are present in the area. Although the Recovery Plan does not establish regulatory requirements, Priority 1 recommends the protection of 85%–95% of the sustainable vernal pool habitat within the Mather core area.

It is important to note that the Recovery Plan sets goals for the *entire* core area, not just the area of the project. The protection goals are not necessarily intended to apply on a project-by-project basis, but rather focus on “sustainable” habitat. Also, it should be noted that recovery plans are not enforceable regulatory documents binding on local planning agencies. (*The Fund for Animals v. Rice*, 1995 U.S. Dist. LEXIS 22389, *11–*12 M.D. Fla. 1995 [“[t]he Florida Panther Recovery Plan . . . presents merely guidelines and not requirements vested with the force of law”]; *Oregon Natural Resource Council v. Turner*, 863 F.Supp. 1277–1284 [D.Or. 1994] [“the development and publication of a recovery plan in and of itself would not have afforded the endangered species any additional protection”; “[t]he recovery plan presents a guideline for future goals but does not mandate any actions, at any particular time, to obtain those goals”]. See also *National Wildlife Federation v. National Park Service*, 669 F.Supp. 384, 388–389 [D.Wy. 1987], which notes that the language of the statute does not support the plaintiff’s assertion that Endangered Species Act [ESA] Section 4[f] obligates the Secretary of the Interior to develop and implement a recovery plan, and that once the plan is developed, all concerned agencies must adhere to it.)

The Rio del Oro project would preserve approximately 70% of the vernal pools within the core recovery area located within the project boundaries. The project applicant(s), in consultation with USFWS, have also secured an additional property—known as the Cook property—for additional mitigation of impacts on vernal pools. The 160-acre Cook property is also within the Recovery Plan’s Mather core area and contains an additional 22+ acres of wetland habitat, including 15.5 acres of vernal pool, seasonal wetland, and seasonal wetland swale habitat (2008 RDEIR/SDEIS, Appendix Q, Figure 16, as updated in 2009 and shown in Chapter 5 of this FEIR/FEIS).

The general plan consistency tables in Appendix P of the 2008 RDEIR/SDEIS address the consistency of the project with policy provisions of the *City of Rancho Cordova General Plan* (City General Plan). The project retains existing connectivity along Morrison Creek by retaining its corridor in the wetland preserve and open space drainage corridors to the west (which is already affected by existing development and Sunrise Boulevard) and provides for a connection to the east, consistent with the City General Plan’s conceptual land use plan for the Grant Line West Planning Area (Figure LU-20 of

the City General Plan). Mitigation plans for wetlands and other waters of the United States and Swainson's hawk are also described in the 2008 RDEIR/SDEIS. USFWS is currently preparing a biological opinion for the project. All of these project-related actions would contribute to the project's consistency with the provisions of the City General Plan's Action NR.1.7.1 ("mitigate project so that it does not contribute to the decline of species populations that impact the viability of the regional population").

USFWS-6

The comment states that USFWS believes that the nature and type of the edge effects would change with the construction of residential development adjacent to VELB habitat. The comment also states that the most recent elderberry survey is nearly 7 years old and USFWS requires an updated survey.

The 2006 DEIR/DEIS, as the comment notes, reaches a similar conclusion. After consultation with USFWS, the project applicant(s) developed a revised VELB mitigation plan in June 2009 (shown in Chapter 5 of this FEIR/FEIS). The 2009 draft VELB mitigation plan includes 3,230 elderberry plantings plus 4,170 associated native plantings, totaling 7,400 plantings required for compensatory mitigation, as determined according to the USFWS conservation guidelines for VELB (USFWS 1999). One mitigation credit is equivalent to 10 plants (five elderberry seedlings and five associated native plants), so 740 mitigation credits are needed to compensate for the loss of elderberry shrubs on the project site. The 2009 draft VELB mitigation plan proposes to satisfy 290.4 mitigation credits through plantings within a 12-acre on-site preserve and to purchase 449.6 credits at an off-site mitigation bank approved by USFWS. The 2008 RDEIR/SDEIS and this FEIR/FEIS conclude, however, that impacts on VELB would remain significant and unavoidable because the on-site elderberry preserve would eventually be surrounded by development and isolated from larger areas of potential habitat and would not be expected to result in any measurable benefit to the species. There are no feasible mitigation measures to fully reduce the impact on VELB to a less-than-significant level.

In 2007, ECORP Consulting surveyed a subsample of the project site, using a methodology agreed to by USFWS, to determine whether elderberry shrub numbers in 2007 were consistent with those documented in 2000. The subsample surveys and analysis of survey results concluded that there was no substantial difference in the number of elderberry shrubs or the number of stems present in 2000 and 2007. Stem diameter was found to be substantially greater in 2007 than in 2000 and the updated stem size data were considered in determining the compensatory mitigation ratios proposed in the 2009 VELB mitigation plan (Appendix R of the 2008 RDEIR/SDEIS). Preconstruction surveys for elderberry shrubs would be conducted for each project phase and the elderberry data gathered during those surveys would be used to calculate final ratios for compensatory mitigation.

USFWS-7

The comment states that two occurrences of the endangered Sacramento Orcutt grass and two occurrences of the threatened slender Orcutt grass are located in the Anatolia Preserve adjacent to the southern boundary of the project site. The comment states that because of the hydrological connection of this site to occupied habitat and because incomplete information was provided in the survey report, USFWS does not accept the May 2003 survey results as definitive.

The 2006 DEIR/DEIS noted that the two species were unlikely to occur. Although suitable habitat is present in vernal pools and swales, the species were not found during special-status plant surveys conducted at the project site in 2003. (2006 DEIR/DEIS, pages 3.10-8 to 3.10-9.) Although these surveys were protocol-level surveys and thus

constitute substantial evidence that the plants do not occur on-site, USFWS nevertheless requested an additional season of surveys.

ECORP Consulting completed additional late-season surveys for Sacramento Orcutt grass and slender Orcutt grass during summer 2006. Those survey results, which were submitted to USFWS in 2006, confirm that these plant species are not present on the site (see page 3.10-66 of the 2008 RDEIR/SDEIS). No hydrological connection exists between the project site and the slender Orcutt grass in the Montelena preserve (erroneously identified as the Anatolia preserve in the comment). Hydrological connectivity between these two sites was eliminated during development activities on the Montelena project site in 2006.

USFWS-8

The comment suggests analyzing an alternative that maintains a high density of development of 11,601 units on a smaller project footprint to avoid and minimize the effects on listed species and their habitat.

The Impact Minimization Alternative was analyzed in the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS. This alternative was formulated to provide a reduced level of environmental impacts relative to the Proposed Project Alternative, while still meeting some of the City's goals and objectives under the California Environmental Quality Act (CEQA) and satisfying USACE's overall project purpose under the National Environmental Policy Act (NEPA) and CWA Section 404(b)(1), to provide a large-scale mixed-use community within Sacramento County. The Impact Minimization Alternative does include a higher density of development than the Proposed Project Alternative by reducing the acreage of single-family residential development from 1,597 acres to 1,032.5 acres and increasing the acreage of high-density residential development from 86 acres to 173.5 acres. The result is that the Impact Minimization Alternative would result in development of 10,560 residential units, compared to the 11,601 units of the Proposed Project Alternative. Total acreages of nonresidential uses (commercial, industrial, business) would also be reduced from 521 acres to 493 acres under the Impact Minimization Alternative.

The Impact Minimization Alternative was analyzed in detail in the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS. No evidence has been presented that increasing the density of development while maintaining a smaller development footprint would further reduce any of the impacts on listed species and their habitats associated with this alternative.

The 2006 DEIR/DEIS also considered, but rejected for full analysis, the Increased Preserve/No Regional Town Center Alternative, which would increase the size of the wetland preserve from 507 acres to 1,106 acres. This alternative is problematic for reasons other than the total number of housing units and thus was rejected for further analysis. Principally, under this alternative, the proposed regional town center could not be located in the southwest corner of the project site. Because of the lack of a feasible regional town center and other substantial losses in City funding, this alternative would not satisfy the key CEQA objectives of the Proposed Project Alternative. Therefore, this alternative was eliminated from further consideration (see 2006 DEIR/DEIS pages 2-79 through 2-81).

USFWS-9

The comment states that the Impact Minimization Alternative is most consistent with USFWS's recommendations regarding protection of vernal pools and wetlands and habitat protection.

The comment is noted. Both the City and USACE will evaluate the feasibility and/or practicability of the Impact Minimization Alternative and the Proposed Project Alternative before any decision documents are issued or project approvals are granted.

USFWS-10

The comment recommends that additional consideration be given to the construction of roads through the wetland preserve area and the exploration of alternate routing or design of roads that, as currently proposed, bisect the preserve area. The comment expresses a concern that locating Rancho Cordova Parkway and Americanos Boulevard in the proposed preserve area would compromise the integrity of the preserve area and would allow additional impacts through runoff from the road and fragmentation of the watershed. The comment also recommends that roads not be constructed through the drainage parkway.

The proposed roadways have been designed to reduce impacts on the preserve through the implementation of mitigation measures described in 2006 DEIR/DEIS Section 3.4, "Hydrology and Water Quality" and in 2008 RDEIR/SDEIS Section 3.10, "Biological Resources." The City is fairly limited on alternate routing for the roads. The City General Plan identified Rancho Cordova Parkway as a major road necessary to relieve the already congested traffic on Sunrise Boulevard. The southern connection point of Rancho Cordova Parkway has already been established by previous approval and development of the SunRidge projects to the south making alternate routing difficult. Given the City's minimum requirements for road width and curve radii, the proposed route of Rancho Cordova Parkway is the least impacting yet practicable design. The roadway has been configured to reduce direct impacts on wetlands and other waters of the United States and the use of culverts and Con-Span bridge crossings has been incorporated to maintain the existing hydrology to the preserved wetlands and other waters while allowing for wildlife movement.

See response to comment USFWS-1 for a discussion of the impacts of the roadways on the preserve.

The drainage parkways would be created in areas that do not currently contain any wetland or species values. The drainage parkways are meant to capture and convey runoff and nuisance flows, provide water quality treatment, and serve as a buffer to compensatory habitat. These parkways would not be connected with the 507-acre vernal pool preserve and are not meant to serve as wildlife movement corridors. Therefore, having roads intersect the drainage parkways should not interfere with their proposed functions and it would not be feasible to avoid road crossings over the drainage parkways.

USFWS-11

The comment recommends widening the proposed drainage parkways along the reconstructed channels to 400 feet to facilitate the control of weedy plant species and to provide an adequate buffer to any wildlife in these corridors from disturbance.

It should be noted that the drainage parkways do not currently exist; the parkways would be created in areas that may have historically contained drainage features but no longer contain any wetland or species values. The drainage corridors have been designed to provide buffers to proposed compensatory habitat and water quality treatment for adjacent runoff that is equivalent to what would be required if the drainage corridors were existing features. The drainage parkways would not be connected with the 507-acre vernal pool preserve and are not meant to serve as wildlife movement corridors. The drainage corridors would be managed as required by an agency-approved operations and maintenance (O&M) plan, which would include measures to manage invasive nonnative

species. The O&M plan would, at a minimum, be approved by USACE, USFWS, and the City before project implementation.

USFWS-12

The comment recommends that a conservation easement be established over the entire proposed preserve area before groundbreaking on the proposed project.

As described on page 2-25 of the 2006 DEIR/DEIS, an easement would be established over the proposed preserve concurrent with the first phase of project development. This easement would allow management of the preserve for wetland and wildlife habitat in perpetuity as well as activities (e.g., habitat restoration, reclamation of developed area, groundwater well monitoring and maintenance) that are necessary to carry out the project's mitigation plan and other required monitoring activities.

To clarify these project features, and as shown in Chapter 5 of this final environmental impact report/final environmental impact statement (FEIR/FEIS), Table 2-1 on page 2-14 of the 2006 DEIR/DEIS has been modified to include a footnote to "Wetland Preserve":

* An easement would be established over the wetland preserve during development Phase 1, with construction of the preserve features to take place during Phases 3 and 5.

In addition, the last paragraph on page 2-21 (continuing onto page 2-22) describing the wetland preserve has been revised as follows:

The proposed project includes a 507-acre wetland preserve that would contain 18.234 acres of vernal pools and 8.006 acres of seasonal wetland habitats. An easement would be established over the wetland preserve ~~The wetland preserve would likely be established~~ during development Phase 1, with construction of the created wetlands within the preserve proposed to take place during Phases 3 and 5 (see Table 2-1) ~~although it would be expanded and continue to be improved as later phases come on line.~~ The exact timing of events within the wetland preserve would be determined by USACE's Clean Water Act Section 404 permit requirements. The wetland preserve would not function as a mitigation bank.

USFWS-13

The comment states that USFWS is opposed to mining activities occurring within proposed preserves.

No mining activity is proposed to take place in any of the proposed preserves on the project site.

USFWS-14

The comment states that USFWS expects to evaluate the effects of remedial activities on federally listed species through a separate formal consultation. The comment mentions specific sites within the proposed preserve, including the Kappa/Gamma complex, the "metal-lined hole," and the Alpha complex.

A soil vapor extraction system has been operating at the Alpha Complex since 2002 to remove volatile organic compounds from the soil. (The location of the Alpha Complex can be found in the updated 2006 DEIR/DEIS Exhibit 3.13-1, "Map of Areas Subject to Remedial Investigation," presented in Chapter 5 of this FEIR/FEIS.) A feasibility study is in progress to address percholorate in soil and contaminants in groundwater. The cleanup process at the Alpha Complex would not affect vernal pools within the preserve.

The California Department of Toxic Substances Control (DTSC) approved a remedial action plan for institutional control (land use restrictions) for the Kappa/Gamma Complex in January 2006. (The location of the Kappa/Gamma Complex can be found in the updated 2006 DEIR/DEIS Exhibit 3.13-1, “Map of Areas Subject to Remedial Investigation,” presented in Chapter 5 of this FEIR/FEIS.) These land use restrictions would be defined before development of this area. Remedial activities at the Kappa/Gamma Complex would not involve removing soil that could affect vernal pools.

The cleanup for the “metal-lined hole” as required by DTSC would entail demolishing the structure. With implementation of appropriate construction practices, no vernal pools would be affected.

The cleanup of White Rock Dump No. 1 as required by DTSC consists of capping the dump. As reported in the 2006 DEIR/DEIS, dump closure activities would require elderberry shrubs located in the area to be removed and relocated or replaced. (2006 DEIR/DEIS, pages 3.10-33 to 3.10-34.) ECORP Consulting prepared a revised draft VELB mitigation plan in 2009 that provides the proposed plan of the project applicant(s) to mitigate the removal of elderberry shrubs from the project site, including those that would be affected by cleanup of the White Rock Road Dump. (See attached Appendix R.)

Final mitigation for impacts on federally listed species, including VELB, resulting from project implementation would be determined through Section 7 consultation with USFWS and incorporate recommendations provided in the final biological opinion for the project.

From: Ben Ritchie
Sent: Monday, February 05, 2007 4:47 PM
To: Patrick Angell
Cc: Pam Johns
Subject: FW: Rio del Oro Development

Please see Laura's comment on the Rio EIR/EIS below.

From: Laura Caballero [<mailto:LCABALLERO@mp.usbr.gov>]
Sent: Mon 2/5/2007 4:44 PM
To: Ben Ritchie
Cc: sparkman@cityofranhocordova.org; Jeff Beiswenger-RC; Kathryn Schroeder; Robert Schroeder
Subject: Rio del Oro Development

Ben,

Please add the following condition to the Rio del Oro project tentative map and the EIS/EIR comments:

The City of Rancho Cordova must provide the Bureau of Reclamation an opportunity to review the Rio del Oro Specific Plan Master Drainage Plan and the City of Rancho Cordova must obtain the Bureau of Reclamation's approval of the Rio del Oro Specific Plan Master Drainage Plan prior to the City of Rancho Cordova's final approval and entitlement of the Rio del Oro Specific Plan and tentative map.

Thank you,

Laura Caballero
Environmental Specialist
Bureau of Reclamation
7794 Folsom Dam Road
Folsom, CA 95630
Ph (916) 989-7172
Fax (916) 989-7208
Cell (916) 295-0694

Reclamation-1

The comment states that the City must provide the U.S. Bureau of Reclamation (Reclamation) an opportunity to review the Rio del Oro Specific Plan Master Drainage Plan and that the City must obtain Reclamation's approval of the plan before the City's final approval and entitlement of the Rio del Oro Specific Plan and tentative map.

The comment is noted. The project does not propose any off-site improvements in the vicinity of the Folsom South Canal at this time.



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1111 Jackson Street, Suite 520
Oakland, CA 94607

February 5, 2007

ER# 06/1179

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

Anna Sutton
U.S. Army Corps of Engineers
1325 J Street, Room 1480
Sacramento, CA 95814-2922

Subject: Review of the Draft Environmental Impact Statement (EIS) for the Proposed Rio del Oro Specific Plan Project, City of Rancho Cordova, Sacramento County, CA

Dear Mr. Angell and Ms. Sutton,

The U.S. Department of the Interior has received and reviewed the subject document and has no comments to offer.

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc: OEPC, HQ,
FWS, CNOO

USDI - 1

Letter
USDI
Response

U.S. Department of the Interior
Office of Environmental Policy and Compliance
Patricia Sanderson Port, Regional Environmental Officer
February 5, 2007

USDI-1

The comment states that the U.S. Department of the Interior has no comments to offer on the Rio del Oro Specific Plan DEIR/DEIS.

The comment is noted.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

February 15, 2007

Anna Sutton
U.S. Army Corps of Engineers
1325 J Street
Room 1480
Sacramento, CA 95814-2922

Subject: Draft Environmental Impact Statement (DEIS) for the Rio del Oro Specific Plan Project (CEQ# 60498)

Dear Ms. Sutton:

The Environmental Protection Agency (EPA) has reviewed the DEIS referenced above. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

The project is proposed to provide a large scale mixed-use community in eastern Sacramento County, in the Morrison Creek watershed. The development will be on 3,828 acres of former mining and industrial property with phased development planned through 2030. The proposed project involves 11,601 dwelling units, 133 acres of commercial development, and 282 acres of industrial parks with 10 and 14 acre conservation areas and 155 acres of drainage parkways. The northern two-thirds of the site is composed of land that has been highly disturbed by dredge tailings from mining activities. While EPA supports re-use of this site, the project may result in several significant environmental impacts, including impacts to waters of the U.S., air quality, and habitat.

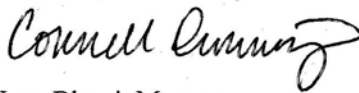
EPA reviewed the Public Notice for this project and on March 29 2004, objected to the issuance of the Clean Water Act (CWA) permit associated with the project, recommending a thorough assessment of the impacts to waters of the U.S. We also recommended at that time that the DEIS demonstrate the project's compliance with the CWA 404(b)(1) Guidelines, including the Least Environmentally Damaging Practicable Alternative (LEDPA) and mitigation for project impacts. We have concerns that the DEIS has not demonstrated that wetlands have been avoided to the greatest extent practicable while achieving the basic project purpose. We are also concerned that adequate mitigation for project impacts to waters of the U.S. and habitat has not been included. There should also be a distinct plan for mitigation of air quality impacts in the area. Based on these concerns, we have rated the DEIS as EC-2, Environmental Concerns - Insufficient Information (see enclosed "Summary of Rating Definitions").

EPA - 1

The FEIS should include several modifications to the Proposed Project Alternative: 1) demonstrate that waters of the U.S. have been avoided to the greatest extent practicable and/or modifications should be made to achieve this end, such as low-impact development mitigation measures, 2) clearly document this avoidance and 3) support the selection of the Proposed Project Alternative as the LEDPA based on objective economic criteria. Additionally, the FEIS should 4) include a detailed analysis of the Increased Preserve Alternative to satisfy the USACE NEPA Section 404(b)(1) Guidelines. EPA is supportive of an increased amount of wetland preserve, as mentioned in the Biological Opinion of the U.S. Fish and Wildlife Service. Our attached comments provide specific recommendations for improvements to the project proposal.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send (2) copies to the address above (mailcode: CED-2). We would be happy to discuss additional avoidance measures or low impact development measures with you during the preparation of the FEIS. If you have any questions, please contact me at 415-972-3846 or Summer Allen, the lead reviewer for this project at 415-972-3847 or allen.summer@epa.gov.

Sincerely,


for Nova Blazej, Manager
Environmental Review Office

Main ID # 4310

Enclosures: Summary of EPA's Rating Definitions
Detailed Comments

Cc: Kelly Fitzgerald, USFWS

Impacts to Waters of the U.S.

In a letter dated March 29, 2004, EPA expressed concerns regarding the significant wetland impacts from the proposed project. In the intervening years, little to no additional avoidance has been proposed by the applicant. The very high impacts (30.3 acres of jurisdictional waters of the U.S. and an additional 12.9 acres of isolated waters) remain a major concern with respect to cumulative impacts, significant degradation, and an inordinately large compensatory mitigation burden. Under normal circumstances, we recognize a draft EIR/EIS would not evaluate alternatives to the level of detail required for 404(b)(1) Guidelines analysis. However, the DEIS states that this document is intended to meet the Guidelines' criteria, and we are providing these comments in the context of our NEPA and CWA 404(b)(1) review.

Vernal pool packing

The acreage of vernal pool impacts is very large. To offset these impacts, the project proponent would create over 20 acres of vernal pools on the 507 acre preserve. We are concerned that the addition of this many created vernal pools would more than double the existing density of vernal pools. We are concerned that this "vernal pool packing" may cause disruption to the hydrology of existing swales and pools and could be less effective than restoration of altered vernal pool landscapes to a more natural and dynamic ecosystem

EPA - 3

Credit for detention basins

In addition, the project proposes to create a large number of wetlands in detention basins. It is not clear whether the proposed wetlands are being constructed for functions that would be in addition to what is needed for stormwater treatment. We question whether credit should be given for such features given their contaminant loading and purported water quality functions. In 2000, six federal agencies jointly published "Guiding Principles for Constructed Treatment Wetlands: for providing water quality and wildlife habitat."¹ The Guidance states that, "In general, wetlands constructed or restored for the primary purpose of treating wastewater will not be recognized as compensatory mitigation to offset wetland losses authorized under federal regulatory programs...The use of constructed treatment wetlands for mitigation for CWA Section 404 purposes is subject to approval by the U.S. Army Corps of Engineers, in consultation with other Federal and State resource agencies. Such decisions need to be made on a case-by-case basis, considering, among other factors, the appropriateness of the constructed treatment wetland to fully offset the anticipated impacts from the loss of natural wetlands."

EPA - 4

Bisected wetland preserve

We note that the proposed wetland preserve is bisected by Rancho Cordova Parkway and, according to the General Plan for the City, is planned to be a rapid transit route. A mitigation area bisected by large-scale transportation projects may not meet the needs outlined in the US Fish and Wildlife Service's *Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon, December 2005*. A more complete analysis of compliance with this plan and

EPA - 5

¹ <http://www.epa.gov/owow/wetlands/pdf/constructed.pdf>

the draft goals of the South Sacramento County Habitat Conservation Plan is required before overall compliance with the Guidelines at 40 CFR 230.10(b) can be determined.

EPA - 5
cont.

Coordinated conservation

The Sunrise Douglas Community Planning Area (SDCPA) is immediately to the south of the project site. There is a proposal to establish over 2,000 acres of wetland preserves in that area, and a comprehensive, coordinated approach to conservation land management in the area should be undertaken. This will be cost-effective for the landowners and provide the agencies with a monitoring plan that can report on both permit compliance and ecological health of the overall system.

EPA - 6

Cumulative effects

In addition to the project's significant impacts to waters of the U.S., we are concerned about cumulative effects on the aquatic ecosystem. Since 1990, Sacramento County has seen rapid growth, with more planned for the Elk Grove, Rancho Cordova, and Natomas areas, causing a cumulative loss of vernal pools and habitat in the area (page 4-11). Furthermore, the DEIS notes on page 4-2, that additional environmental impacts can be expected with full build-out. Given this scenario, the Sacramento Area Council of Governments (SACOG) Sacramento Region Blueprint (1993) called for higher residential densities than are currently in place. This document relies on the SACOG Blueprint but the Smart Growth elements of the Blueprint have not been finalized and we are concerned with calls for development within areas that support high density aquatic resources without measures to mitigate for these impacts. With time and increasing development in the area, there are fewer and fewer places that can be used for compensatory mitigation.

"Other Statutory Requirements", exhibit 4-1, shows projects in the immediate vicinity of Rio del Oro. It appears as if the DEIS does not adequately capture proposed impacts from the developments at Mather Air Field, Cordova Hills, Excelsior Estates, the Waegell Family property within and adjacent to the SDCPA, and the Regional Connector Transportation project sponsored by SACOG. From Public Notices, EPA is aware of the projects shown in the table below. Proposed development from projects in this area, not including those from the transportation project, will affect over 15,000 acres. In turn, these projects have the potential for impacting or degrading over 600 acres of waters of the U.S.

EPA - 7

Project Name	Total Acres	Acres of Waters of the US	Approximate Vernal Pool Acreage	Impacted Acres of Waters of the US (estimated)
Sunrise Douglas Community Planning Area	5,410	230	170	165
Rio del Oro	3,828	70	38	43
Mather Field	3,568	138	70	30
Waegell Property	1,300	116	22	unknown
Cordova Hills	1,320	63	42	18

TOTAL (approximate)	15,426	617	342	256 (not including Waegell)
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EPA - 7
cont.

Recommendations:

The FEIS should assure that the dense creation of vernal pools as proposed in the project will be effective for restoration and will not disrupt the hydrology of the existing swales and pools. The FEIS should also clearly establish the expected functions of the wetlands that will be created within detention basins and the appropriateness of the constructed treatment wetlands to offset impacts from the loss of natural wetlands onsite.

EPA - 8

The FEIS should include a more complete analysis of compliance with US Fish and Wildlife Service's *Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon, December 2005* and the draft goals of the South Sacramento County Habitat Conservation Plan, specifically with regard to the bisected conservation area. The proponent should establish the same monitoring and assessment procedures used in the SDCPA for any preserve area at Rio del Oro site and coordinate with landowners in the SDCPA to ensure there is one conservation easement holder for all these preserves.

EPA - 9

The impacts to the regional aquatic ecosystem from multiple large-scale projects are very high, and the FEIS should carefully evaluate and mitigate the cumulative impacts to the resources. The FEIS should evaluate the feasibility of a larger wetland preserve that encompasses much of the southern area of the project boundary. We note that in their Biological Opinion for the project, the Fish and Wildlife Service asked for establishment of a 1,310-acre contiguous preserve, and we agree with this recommendation.

EPA - 10

LEDPA Determination

We disagree that the compliance with the CWA 404(b)(1) Guidelines has been shown (DEIS, page 2-3). Although the DEIS analyses a few alternatives in detail, the evaluation is not sufficient to meet the needs of an alternatives analysis prepared under the Clean Water Act 404(b)(1) Guidelines. At this time, this project does not appear to be the Least Environmentally Damaging Practicable Alternative (LEDPA). In particular, the DEIS has not demonstrated that more wetland areas cannot be avoided while achieving the basic project purpose, such as with a larger wetland preserve that encompasses much of the southern area of the project boundary.

EPA - 11

Although the DEIS briefly analyzes the potential for an increased preserve size, it notes that due to the decrease in retail and commercial development, "[t]he loss of these development impact fees could require a scaling back of the City's vision for added community amenities" (page 2-80). Page 2-81 states that implementation of the Increased Preserve Alternative would "likely satisfy the USACE NEPA Section 404(b)(1) Guidelines, [but] it was eliminated from further detailed study because it would not achieve the key CEQA project objectives." Using the City's vision is not a reasonable cost criterion for alternative rejection. The following citation is from the field memo, "Memorandum: Appropriate Level of Analysis Required for Evaluating Compliance with the Section 404(b)(1) Guidelines Alternatives Requirements", issued by the Corps and EPA in 1993:

The Guidelines provide the Corps and EPA with discretion for determining the necessary level of analysis to support a conclusion as to whether or not an alternative is practicable. Practicable alternatives are those alternatives that are "available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes." 40 CFR 230.10(a)(2).

In these guidelines, it does not assume that the project has to generate sufficient funds to support a City's vision. In addition, the Guidelines Preamble, "Alternatives", 45 Federal Register 85339 (December 24, 1980), notes that: "the level of analysis required for determining which alternatives are practicable will vary depending on the type of project proposed. The determination of what constitutes an unreasonable expense should generally consider whether the projected cost is substantially greater than the costs normally associated with the particular type of project. Generally, as the scope/cost of the project increases, the level of analysis should also increase." The preamble to the Guidelines, "Economic Factors", 45 Federal Register 85343 (December 24, 1980) notes that: "It is important to emphasize, however, that it is not a particular applicant's financial standing that is the primary consideration for determining practicability, but rather characteristics of the project and what constitutes a reasonable expense for these projects that are most relevant to practicability determinations."

EPA - 11
cont.

Relevant case law also describes the role of costs in analyzing project alternatives. "While the applicant's wish to minimize his costs is obviously a factor which the Corps can consider, that factor alone must not be allowed to control or unduly influence the Corps' definition of project purpose, or 'practicable alternative', or any other part of the 404(b)(1) evaluation. (From Permit Elevation, Plantation Landings Resort, Inc. Department of Army Findings at p. 8-9). The Corps findings from the 1989 Hartz Mountain 404(q) Elevation note that the alternatives analysis should not be constrained by a narrowly-defined project purpose and often, Federal concerns (including environmental concerns), "will result in decisions that are inconsistent with local land use approvals." When we review and comment on large scale development proposals, EPA normally expects a reasonably rigorous quantitative analysis of residential development alternatives considered and the appropriateness of the level of housing development identified in the preferred alternative.

Recommendations:

The FEIS should analyze the Increased Preserve Alternative in detail in order to support the project's compliance with the 404(b)(1) Guidelines and selection of the LEDPA, including a justification that the project has incorporated all potential avoidance of waters of the United States. If possible, the Proposed Alternative should be modified to further minimize impacts to Waters of the U.S. Clearly defined economic goals should be used to explain the rationale for eliminating the Increased Preserve Alternative. The FEIS should discuss how the applicant determined the proposed project is the LEDPA, using acceptable cost, logistical, and technical feasibility criteria, in light of concerns over significant degradation and cumulative impacts. It should discuss specifically the transportation infrastructure impacts from the off-site alternatives.

EPA - 12

Air Quality

The Sacramento Federal Non-Attainment Area (SFNA) in which this project is located is currently designated as serious non-attainment for ozone, and Sacramento County is designated as moderate non-attainment for the particulate matter less than 10 microns in diameter (PM10) under the National Ambient Air Quality Standards (NAAQS). In 2007, the State of California and the SFNA districts will submit a new ozone plan known as a State Implementation Plan (SIP) to meet the 8-hour ozone NAAQS.

The proposed project converts 3,800 acres of rural, undeveloped land to urban land uses and will have cumulatively significant increases to peak-hour and daily traffic volumes with resulting long-term increases in emissions that would exacerbate existing and projected non-attainment conditions. The DEIS notes that "Project-related long-term operational emissions of reactive organic gases (ROGs), oxides of nitrogen (NOx), and particulate matter less than or equal to 10 microns in diameter (PM10), when combined with emissions from other reasonably foreseeable future projects in the Sacramento Valley Air Basin as a whole, would contribute to long-term increases in emissions that would exacerbate existing and projected nonattainment conditions." (p.g. 4-12). It concludes that "the project's contribution to regional air quality violations would be cumulatively considerable."

In addition, we are concerned that the DEIS contains outdated information. For example, page 4-14 notes that the region is not required to update the SIP before the ozone 8 hour ozone plans are due in 2006 and that the new Metropolitan Transportation Plan (MTP) 2025 no longer contains regional transportation projects. It notes that this issue will be resolved after the SIP is approved in 2006 and the new MTP 2025 is adopted. While the 8-hour plan is due June 15, 2007, the MTP 2025 (now referred to as MTP 2035) may not be approved until August/September 2007 potentially delaying the SIP until late 2007. This information is not included in the DEIS.

This project will need consultation and coordination with the Sacramento Metropolitan Air Quality Management District (SMAQMD) on requirements for General Conformity. In order to comply with section 176(c) of the Federal Clean Air Act, the project must conform to the applicable SIP required under Section 110(a) of the Federal Clean Air Act before the action is otherwise approved. Hence, conformity means that federal actions must be consistent with a SIP's purpose of eliminating or reducing the severity and number of violations of the NAAQS and achieving expeditious attainment of those standards. Each federal agency must determine that any action that is proposed by the agency and is subject to the regulations implementing the conformity requirements will in fact conform to the applicable SIP before action is taken. The Rio del Oro project is subject to the General Conformity Rule since it is sponsored and supported by a federal agency. The DEIS notes that with the exception of the No Project Alternative, both Phase 1 construction and operational emissions will exceed general conformity de minimus thresholds: 100 Tons per Year (TPY) for PM₁₀ and 50 TPY for NOX and ROG. However, the DEIS does not disclose if coordination with the SMAQMD has taken place. This is important as all emissions from the project will have to be mitigated through reductions, offsets, controls, etc. in order to comply with the Clean Air Act and proceed with the project.

EPA - 13

EPA - 14

Recommendations:

The FEIS should ensure that all mitigation outlined in Chapter 3.15 will be implemented in association with the project. The FEIS should include updated information regarding the SIP and the MTP and how these will guide the mitigation measures associated with the project. The FEIS should analyze compliance with conformity requirements and include information on recommendations from SCAQMD. As an example of a draft general conformity determination please refer to the Draft Environmental Impact Statement for Folsom Dam Safety (Section 3.3 - Air Quality) found at http://www.usbr.gov/mp/nepa/nepa_projdetails.cfm?Project_ID=1808 We also refer you to EPA's the web link for general conformity requirements. <http://www.epa.gov/ttn/oarpg/genconformity.html>

EPA - 15

Habitat Impacts

The project site includes habitat that is suitable for numerous special status birds, including the Swainson's hawk, Burrowing owl, Northern harrier, and loggerhead strike. It is also suitable habitat for the California tiger salamander, the western spadefoot toad, and multiple types of fairy shrimp. The project will involve removal of 867 acres of woodland and riparian habitat, with this type of habitat in the region rapidly declining (p. 4-11). The U.S. Fish and Wildlife Service (FWS) has been involved since 2002 and, in 2005, questioned the project design in that it did not avoid impacts to upland areas that are important for maintenance of hydrologic conditions and for providing habitat for vernal pool plant pollinators.

In the April 25, 2006 Section 7 consultation, the FWS expressed the need for the proposed avoided area to have a Service-approved, third-party conservation easement, a Management and Monitoring Plan, and a long-term funding mechanism in place. They requested management and monitoring of the conservation areas for either ten consecutive years or seven years over a 15 year period, with monitoring reports submitted for each monitoring year. These terms were in addition to other, significant conservation recommendations such as restricted residential and municipal development at Rio del Oro to the 2,519-acre mine-tailings area and establishment of the 1,310-acre grassland area as a single contiguous preserve. While the document references consultation with the FWS regarding mitigation measures such as setbacks from waters of the U.S., there is no reference to the final Biological Opinion or how the project is responding to the measures that FWS has asked for regarding impacts.

EPA - 16

Recommendation:

Given that sensitive habitat as seen in the project site is declining and the large-scale impacts of the project, the FEIS should document the status of the Biological Opinion and specifically, which of the FWS-recommended mitigation measures will be implemented. It should include a more detailed habitat map for the proposed action and increased preservation alternatives like the ones associated with the off-site alternatives in Exhibits 2-20 and 2-21 to more clearly weigh impacts.

Smart Growth

Regional congestion on Highway 50 and Sunrise Boulevard has continued to be a problem. In an effort to address this issue, the Rancho Cordova General Plan notes on page 1 that "Neighborhood, village, and district design will start with the pedestrian and work its way up to the cars." It is unclear how the proposed project will be designed in this manner. While we appreciate the inclusion of the High Density Alternative to correspond with smart growth principles, this Alternative would impact the same amount of acreage as other alternatives. The DEIS does not justify why, if housing density was increased, the amount of land developed could not be decreased to still meet the purpose and need of the project.

EPA - 17

Additional recommendations for smart growth design of the planned communities are described in detail by the Smart Growth Network.² Community-designed strategies can achieve economic goals while meeting environmental measures. Under the 1991 Intermodal Surface Transportation Efficiency Act (ISTEA) and the 1990 Clean Air Act Amendments, all metropolitan areas with populations greater than 50,000 must adopt a 20 year transportation plan that results in emissions consistent with the SIP. The DEIS notes that the Regional Metropolitan Transportation Plan for 2025 (SACOG 2002) identifies roadway improvements and that some feeder bus services are included for Sunrise Boulevard, Mather Boulevard, and Zinfandel Drive. However, while the City has developed a transit system map identifying corridors for potential transit routes (p. 3.14-16/17) no additional information is included on the feasibility of these measures.

EPA - 18

Recommendations:

We remain concerned that not all measures have been examined that could minimize unavoidable impacts. To do so, we encourage the use of "Low Impact Development" (LID) principles.³ These measures should be incorporated into the design, and the FEIS should demonstrate the reduction in impacts to resources from these modifications:

- Establish minimum upland buffer zones of 100 feet extending from each bank of all avoided waters.
- Minimize the amount of impervious cover.
- Establish new legal status for avoidance areas (*i.e.*, new individual parcels with restrictive covenants on all avoided waters and associated buffer zones). Record these legal restrictions within 30 days of 404 permit issuance.
- Establish responsibility and oversight of the preserve areas by an independent third-party with appropriate expertise (*e.g.*, conservation organization, regional parks district).
- Analyze the practicability of front-loaded streets to minimize impacts to aquatic habitat.
- Ensure that all detention basins provide required water-quality functions and site them off-stream where practicable.
- Ensure that recreational trails are placed outside the buffer zones associated with washes (*i.e.*, trails no closer than 100' from the edge of bank).

EPA - 19

² http://www.epa.gov/smartgrowth/getting_to_sg2.htm

³ <http://www.epa.gov/smartgrowth>

In addition, more information should be included on transit options and plans for the area to mitigate further congestion and significant air quality impacts resulting the increase in vehicular miles traveled.

EPA - 19
cont.

Water Quality

The DEIS notes that the majority of overland watercourses in the area have disappeared due to mining activity and the northern two-thirds of the site is composed of highly disturbed land from dredge tailings. Because it is downstream, Morrison Creek is subject to Central Valley Regional Water Quality Control Board (RWQCB) regulation for designated uses, such as municipal water supply, irrigation, recreation, migration, and habitat. Wet weather samples in Morrison Creek had consistently elevated coliform bacteria and total suspended solids as well as high values for polycyclic aromatic hydrocarbons (PAHs-a byproduct of combustion or asphalt sealants) and the pesticide diazinon. The 2002 version of the Section 303(d) list identifies a 21 mile stretch of Morrison Creek as impaired for diazinon (from agriculture and urban runoff) and it is considered a high priority for a Total Maximum Daily Load (TMDL).

EPA - 20

Recommendation:

The FEIS should address the additional impacts of the proposed developments on Morrison Creek, include updated information on the results of sampling in this area, and include mitigation as appropriate.

EPA-1

The comment states that EPA is concerned that the DEIS has not demonstrated that wetlands have been avoided to the greatest extent practicable.

The purpose of the 2006 DEIR/DEIS is to analyze the impacts of the Proposed Project and alternatives to the project. Although the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS does eliminate certain alternatives from further consideration because of their infeasibility, the document is not meant to satisfy the requirements of the CWA Section 404(b)(1) Guidelines (Guidelines) (40 Code of Federal Regulations [CFR] 230). EPA is being given the opportunity to review and comment on the Draft Section 404(b)(1) alternatives information prepared by the project applicants. Using the 2006 DEIR/DEIS, the 2008 RDEIR/SDEIS, and other available information, USACE will conduct a full analysis for compliance with the Guidelines within the record of decision (ROD). In accordance with the Guidelines, no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge that would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences. USACE will continue coordination with EPA to ensure compliance with the Guidelines.

The comment also states that EPA is concerned that adequate mitigation for project impacts on waters of the United States and habitat has not been demonstrated.

Section 3.10 of the 2008 RDEIR/SDEIS provides numerous feasible mitigation measures to address project impacts on waters of the United States and habitat. The mitigation measures have been revised and updated in the 2008 RDEIR/SDEIS. The applicant also has submitted a revised wetland MMP to address impacts (see Appendix Q of this FEIR/FEIS). In its comment, EPA does not provide specific additional mitigation measures that it would like to see incorporated. The intent of this FEIR/FEIS is to evaluate the potential significant impacts of the Proposed Project and other alternatives, as well as to identify mitigation measures to help reduce these impacts. Before issuance of a permit, USACE will ensure, pursuant to its regulations (33 CFR 320–332) and the Guidelines, that impacts on waters of the United States are avoided and minimized to the maximum extent practicable, and that unavoidable impacts are compensated, as explained in response to comment EPA-1.

The comment also states that there should be a distinct plan for mitigation of air quality impacts in the area.

Section 3.15 of the 2006 DEIR/DEIS provides numerous feasible mitigation measures to address temporary, short- and long-term project impacts on air quality. See also responses to comments SMAQMD-1 through SMAQMD-6 from the Sacramento Metropolitan Air Quality Management District (SMAQMD), in Section C, “Regional and Local Agencies,” of this chapter. In its comment, EPA does not provide specific mitigation measures that it would like to see incorporated into the air quality plan.

EPA-2

The comment requests that the FEIS include additional information, specifically, that it do all of the following: (1) demonstrate that waters of the United States have been avoided to the greatest extent practicable, and/or make modifications such as low-impact development mitigation measures; (2) clearly document the avoidance; (3) support the

selection of the Proposed Project Alternative as the Least Environmentally Damaging Practicable Alternative (LEDPA) based on objective economic criteria; and (4) include a detailed analysis of the Increased Preserve Alternative to satisfy the Section 404(b)(1) Guidelines.

These items will be addressed in the Section 404(b)(1) LEDPA analysis within the ROD. See responses to comments EPA-1 and EPA-2.

The comment also states that EPA is supportive of an increased amount of wetland preserve, as mentioned in the USFWS biological opinion.

The comment is noted. USFWS has not yet issued a biological opinion for the project, although a draft biological opinion was issued on April 25, 2006 (USFWS File Number 1-1-06-1108), and a revised draft was issued on August 11, 2009 (USFWS File Number 1-1-04-F-0006). USACE will not issue the ROD until the biological opinion has been issued by USFWS. In addition, USACE will not issue a permit until all requirements of the Guidelines are met, as discussed in responses to comments EPA-1 and EPA-2. However, the EIR will be certified before the final biological opinion is issued.

EPA-3

The comment expresses a concern that the plan to create vernal pools within the vernal pool preserve would double the existing density of vernal pools, and that this “vernal pool packing” may cause disruption to the hydrology of existing swales and pools.

The project applicant(s) have proposed to mitigate impacts on vernal pools by restoring/creating 13.5 acres of vernal pools and to preserve 20.4 acres of vernal pools within the proposed preserve. This would result in a vernal pool density of 6.7%. This proposal would not result in a doubling of the existing density, but would increase the density by approximately 2.5%. This density is consistent with densities found to occur in other vernal pool complexes in the region and includes re-creation of wetlands that had historically existed on the site.

As indicated by the hydrologic analysis described on pages 3.10-33 through 3.10-35 of the 2008 RDEIR/SDEIS, project implementation is not expected to decrease watershed ratios below levels necessary to sustain existing depressional wetlands or the proposed 13.5 acres of compensatory vernal pools. According to the model, the proposed on-site wetland preserve could accommodate and support an additional 50 acres of vernal pool habitat without compromising the existing hydrology. See response to comment USFWS-1.

EPA-4

The comment notes that a “large number of wetlands” would be created in detention basins and questions whether credit should be given for such features.

The 2006 DEIR/DEIS (page 2-22) stated that:

Seasonal wetland habitats would be created in the three detention basins proposed on the site. Approximately 60% (19.5 acres) of the basins would be designed to function as seasonal wetlands. Furthermore, 186 acres of drainage corridors would be established on the project site. Low-flow channels and riparian wetland would be established in the proposed drainage corridors. These corridors would range from 200 feet to 300 feet wide and would consist of meandering low-flow channel, adjacent wetlands, riparian plantings, and a bike trail. Assuming an average low-flow channel width of 10 feet and 10 feet of associated riparian habitat on either side, project implementation would create an

additional 12.3 acres of riparian habitat and 6.53 acres of low-flow channel. These corridors would reestablish defined drainage corridors for the site that have not been present since the dredging operations completely altered the character and topography of the majority of the site.

Since publication of the 2006 DEIR/DEIS, a revised wetland MMP has been developed and the project applicant no longer proposes creation of compensatory seasonal wetlands within the detention basins. The revised MMP proposes establishment of 187 acres of open space corridors containing 16.9 acres of created seasonal wetlands and 8.4 acres of created low-flow channel. The most current draft (June 2009) of the wetland MMP (Appendix Q) is attached to this FEIR/FEIS. Additional wetland mitigation measures are proposed in Mitigation Measures 3.10-1a and 3.10-1b (2008 RDEIR/SDEIS, pages 3.10-40 through 3.10-45).

EPA-5

The comment states that a preserve bisected by Rancho Cordova Parkway may not be consistent with USFWS's Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon, and that a more complete analysis of the Recovery Plan and the draft goals of the South Sacramento County Habitat Conservation Plan (SSCHCP) is required for overall compliance with the Section 404(b)(1) Guidelines.

See also response to comment USFWS-5 for a discussion of the Recovery Plan and response to comment USFWS-1 for discussion impacts on the preserved wetlands resulting from the proposed Rancho Cordova Parkway design.

Project consistency with the SSCHCP is not required under CEQA or NEPA because the SSCHCP has not been adopted. The SSCHCP is not scheduled for completion, adoption, and implementation until 2011. The SSCHCP currently assumes that the proposed on-site wetland preserve is established. It is also expected that this project will receive its 404 permit approvals and associated biological opinion before the SSCHCP is adopted.

EPA-6

The comment recommends a "comprehensive, coordinated approach" to conservation land management with the Sunrise Douglas Community Plan area, which is immediately south of the Rio del Oro project site.

The Rio del Oro project has been designed to allow connections to existing conservation areas and/or proposed conservation areas to the maximum extent possible. The properties located directly south of the Rio del Oro project site have been permitted and approved, and do not offer any possible open space connections. As explained in the 2008 RDEIR/SDEIS (page 3.10-26), the proposed wetland preserve would connect to the agency-proposed conservation area identified in *A Conceptual-Level Strategy for Avoiding, Minimizing, & Preserving Aquatic Resource Habitat in the Sunrise-Douglas Community Plan Area* (June 2004) adjacent to the eastern portion of the project site, just north of the proposed North Douglas Road.

EPA-7

The comment expresses concerns about cumulative effects on the aquatic ecosystem—specifically, calls for development within areas of Sacramento County that support high-density aquatic resources without measures to mitigate these impacts. The comment states that the DEIS appears not to have adequately captured proposed impacts from the developments at Mather Air Field, Cordova Hills, Excelsior Estates, the Waegell Family property within and adjacent to the Sunrise Douglas Community Plan area, and the Regional Connector Transportation project sponsored by the Sacramento Area Council

of Governments (SACOG). As stated in the comment, these developments would affect more than 15,000 acres and have the potential to degrade more than 600 acres of waters of the United States.

The cumulative impacts analysis was revised in the 2008 RDEIR/SDEIS to include impacts on biological resources from the proposed Mather Field, Cordova Hills, Excelsior Estates, and the Arboretum (Waegell) projects. (See Table 3.10-4, page 3.10-69 of the 2008 RDEIR/SDEIS.) As determined in the 2008 RDEIR/SDEIS, cumulative impacts on biological resources would remain significant and unavoidable because even with implementation of the proposed mitigation and regional enforcement of the USACE “no-net-loss” standard, the value of the region as it relates to the long-term viability of these resources would be substantially diminished. There is no feasible mitigation available that could fully mitigate this impact when considered cumulatively with the adverse effects on similar aquatic resources resulting from all existing and proposed projects in the region.

EPA-8

The comment states that the FEIS should assure that the dense creation of vernal pools as proposed in the project will be effective for restoration and will not disrupt the hydrology of the existing swales and pools and should clearly establish the expected functions of wetlands to be created in the detention basins.

See responses to comments USFWS-1, USFWS-2, and EPA-3 for a discussion of the hydrologic functions of the preserve as well as vernal pool densities. No compensatory wetland habitat will be created in the drainage basins (see response to comment EPA-4).

EPA-9

The comment recommends that the FEIS should include a more complete analysis of compliance with USFWS’s Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon, December 2005 and the draft goals of the SSCHCP.

See responses to comments USFWS-5 (second part of comment and response) and EPA-5 for a discussion of the Recovery Plan and the SSCHCP. As noted in response to comment EPA-5, the SSCHCP remains in draft form and an analysis of the plan’s consistency would be premature at this time.

The comment also states that the project proponent should establish the same monitoring and assessment procedures used in the Sunrise Douglas Community Plan area for any preserve area at the project site, and to coordinate with landowners in the Sunrise Douglas Community Plan area to ensure that there is one conservation easement holder for all these preserves.

The comment is noted. The holder of the conservation easement will be identified during the processing of the CWA Section 404(b)(1) permit and through negotiation of an incidental take statement from USFWS. The project applicant(s) have preliminarily contacted Sacramento Valley Open Space regarding management of the proposed preserve (Rutledge, undated pers. comm.).

EPA-10

The comment states that the FEIS should carefully evaluate and mitigate the cumulative impacts on the regional aquatic ecosystem.

See response to comment EPA-7 for a discussion of cumulative impacts on the aquatic ecosystem in Sacramento County.

The comment also states that the FEIS should evaluate the feasibility of a larger wetland preserve that encompasses the southern boundary of the project, and recommends a 1,310-acre contiguous preserve as proposed in the USFWS biological opinion.

The Impact Minimization Alternative, which was analyzed in the 2006 DEIR/DEIS and the 2008 RDEIR/SDEIS, would preserve nearly the entire southern boundary of the project site. The feasibility of this alternative, as well as others, will be considered by the City when it considers the merits of the project and in its CEQA findings. USACE will consider the practicability of this alternative in its 404(b)(1) alternatives analysis. EPA's opinion regarding a 1,310-acre contiguous preserve alternative is noted. As noted in response to comment EPA-2 above, USFWS has not yet issued a biological opinion for the project, although a draft biological opinion has been provided to USACE. Although USFWS has proposed that the preserve be increased to 1,310 acres, there is no further information on the boundaries of such a preserve or how such a preserve would reduce impacts. The 2006 DEIR/DEIS and 2008 RDEIR/SDEIS analyzed a reasonable range of alternatives, including an alternative that would not involve any fill of waters of the United States.

EPA-11 *The commenter disagrees that compliance with the CWA Section 404(b)(1) Guidelines has been shown, citing DEIR/DEIS page 2-3. The comment states that the project does not appear to be the least environmentally damaging practicable alternative.*

Neither the 2006 DEIR/DEIS nor the 2008 RDEIR/SDEIS asserts that the document satisfies the requirements of the Guidelines. Before project approval, USACE must determine whether the Proposed Project Alternative is the LEDPA. This determination must be supported by the CWA Section 404(b)(1) alternatives analysis. USACE will consider EPA's comments when reviewing that analysis. See responses to comments EPA-1 and EPA-2.

EPA-12 *The comment recommends that the FEIS show project compliance with the Section 404(b)(1) Guidelines by analyzing the Increased Preserve Alternative and clearly define the economic goals used to eliminate that alternative. The commenter would also like justification for how the LEDPA was chosen. The comment suggests that the Proposed Alternative be modified further to reduce impacts on waters of the United States. In addition, the comment states that the FEIS should discuss specifically the transportation infrastructure impacts from the off-site alternatives.*

See response to comment EPA-11 for a discussion of compliance with the Guidelines. See responses to comments Habitat-5, USFWS-1, and USFWS-10 for responses related to roadway impacts on biological resources.

EPA-13 *The comment notes that information in the 2006 DEIR/DEIS about air quality planning documents is out of date.*

Air quality planning documents have been released since the previous version of the Rio del Oro 2006 DEIR/DEIS was published. As shown in Chapter 5 of this FEIR/FEIS, the first paragraph on page 3.15-16 of the 2006 DEIR/DEIS is hereby revised as follows:

Although the region has made significant progress in reducing ozone, a problem has arisen with regard to another requirement set forth in the CAA. The region's transportation plan must conform and thus show that it does not harm the region's chances of attaining the ozone standard. The SIP is tied to a "motor vehicle emissions budget" (MVEB); transportation planners must ensure that

emissions anticipated from plans and improvement programs remain within this budget. ~~The region is not required to update the SIP before the ozone (8-hour) plans are due in 2006. However, since a conformity lapse began on October 4, 2004, an expedited process to prepare a plan is under way.~~

In the March 14, 2006, Federal Register posting, EPA found that the MVEBs for 2008 were determined to be adequate for transportation conformity purposes. The Sacramento Area Council of Governments (SACOG) was able to demonstrate that the 2006 Metropolitan Transportation Plan and the 2006/2008 Metropolitan Transportation Improvement Program for the Sacramento region were below the 2008 MVEB. The Sacramento Regional Nonattainment Area 8-Hour Attainment Demonstration Plan, which was completed December 19, 2008, updated the allowable motor vehicle emissions budgets for ROG and NO_x for 2008 using the new EMFAC model (EMFAC2007) and population and travel activity figures. In addition, it established new budgets for several other years up to and including the attainment deadline year. After EPA finds these new budgets adequate, then SACOG must demonstrate that emissions from subsequent transportation plans will be below the emission budget levels established in this new air quality plan (SMAQMD 2009).

EPA-14

The comment notes that the project requires consultation and coordination with SMAQMD on requirements for general conformity, as it must conform to the applicable state implementation plan (SIP) required under Section 110(a) of the federal Clean Air Act (CAA) before the action is otherwise approved.

According to EPA's detailed comments (page 5), the Rio del Oro project is subject to the General Conformity Rule since it is sponsored and supported by a federal agency. The DEIS notes that with the exception of the No Project Alternative, both Phase 1 construction and operational emissions will exceed general conformity de minimis thresholds: 100 tons per year (TPY) for PM₁₀ and 50 TPY for NO_x and ROG. However, the DEIS does not disclose if coordination with the SMAQMD has taken place. This is important as all emissions from the project will have to be mitigated through reductions, offsets, controls, etc. in order to comply with the Clean Air Act and proceed with the project.

EPA rightfully notes that this project, a federal action, must demonstrate conformity with the SIP's purpose of fulfilling CAA requirements. However, the commenter states that the project is "sponsored and supported by a federal agency," which is an inaccurate statement. This distinction is important because the degree to which the General Conformity Rule applies depends on whether the project is considered a "federal action" or whether it is "sponsored and supported by a federal agency." The federal action in question is the federal approval of the Section 404 CWA permit, and the project is not "sponsored and supported by a federal agency."

The definition for "federal action" states that where the federal action is a permit, license, or other approval for some aspect of a nonfederal undertaking, the relevant activity is the part, portion, or phase of the nonfederal undertaking that requires the federal permit, license or approval (40 CFR 93.152).

According to 40 CFR 93.153(b), the General Conformity Rule requirements apply only to the project (or portion of the project) with which the federal agency is directly involved—in this case, the actions pursuant to the Section 404 permit. Thus, although the project

would involve converting approximately 3,800 acres of land, only approximately 70 acres of wetlands and other waters of the United States/waters of the state would be directly and indirectly affected by the permit. Ultimately, it is the federal agency granting the permit, in this case, USACE, that determines the scope of the federal action. See *Sierra Club v. United States Army Corps of Eng'rs* (2006) 450 F. Supp. 2d 503, 515–516.

According to 40 CFR 93.153, a conformity determination is required only when the direct and indirect emissions of the relevant criteria pollutants and precursor pollutants specifically caused by the federal action equal or exceed certain *de minimis* thresholds.

Direct emissions are defined as those emissions of a criteria air pollutant or its precursors that are caused or initiated by the federal action and occur at the same time and place as the action.

As specified in 40 CFR 93.152, indirect emissions are defined as emissions of a criteria pollutant or its precursors that:

- (1) Are caused by the federal action, but may occur later in time and/or may be further removed in distance from the action itself but are still reasonably foreseeable; and
- (2) The federal agency can practicably control and will maintain control over due to a continuing program responsibility of the federal agency.

Because the federal agency would not maintain control over emissions that would result from implementing the proposed land uses (e.g., operational emissions), part 2 of the definition of indirect emissions would not be met. Thus, only direct emissions from the federal action (e.g., construction emissions associated with permitting the fill of wetlands and other waters of the United States on the project site) would be subject to the conformity rule.

Before a federal action is taken, it must be evaluated for conformity with the SIP. The purpose of the general conformity program is to ensure that actions taken by the federal government do not undermine state or local efforts to achieve and maintain national ambient air quality standards. According to 40 CFR 93.153(b), however, the General Conformity Rule requirements apply only to the project (or portion of the project) with which the federal agency is directly involved—in this case, the actions pursuant to the Section 404 permit. Thus, only those emissions from the equipment and motor vehicles used in the filling operation, from support equipment, and from equipment used to move the fill material would be included in the analysis. If it is found that the federal action would create emissions above *de minimis* threshold levels specified in EPA regulations, or if the activity is considered regionally significant because its emissions exceed 10% of an area's total emissions, the federal action cannot proceed unless mitigation measures are specified that would bring the project into conformance. If the *de minimis* threshold is not exceeded, no further analysis is required. General conformity with respect to the project will be determined in the ROD.

It is worth noting that the Sacramento Federal Nonattainment Area completed its contribution to the 8-hour ozone SIP, the *Sacramento Region 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (8-Hour Ozone Plan) in December 2008 (ARB 2008). The emissions inventory projections contained in the 8-Hour Ozone Plan were based, in part, on vehicle activity projections data from SACOG. These data were obtained in April 2008. Because the City of Rancho Cordova adopted its general plan update in 2006, it is reasonable to assume that growth anticipated in the City General

Plan (which includes the proposed Rio del Oro project) is included in the on-road mobile-source portion of the emissions budget contained in the 8-Hour Ozone Plan.

The 2006 DEIR/DEIS includes a CEQA-compliant air quality analysis as well as mitigation measures (see Section 3.15, “Air Quality,” of the DEIR/DEIS). If the project is approved, these mitigation measures will be adopted and incorporated into the project, and compliance will be monitored pursuant to the City’s mitigation monitoring and reporting program (MMRP) that also will be adopted following EIR certification as part of the project approval. A conformity determination is not required for CEQA compliance; therefore, the City is proceeding with this FEIR. Under NEPA, however, such a determination is required to complete the NEPA process and before a ROD can be issued. USACE is coordinating with EPA to resolve this issue in conjunction with USACE’s FEIS.

EPA-15

The comment recommends that the FEIS ensure that mitigation from Chapter 3.15 [Section 3.15, “Air Quality”] of the DEIS is implemented, include updated information on the SIP and metropolitan transportation plan (MTP) and how they will guide the project’s mitigation measures, and include the recommendations from SMAQMD.

See responses to comments EPA-13 and EPA-14 for discussions of mitigation of air quality impacts and compliance with conformity requirements.

EPA-16

The comment recommends that the FEIS document the status of the biological opinion and document which USFWS-recommended mitigation measures will be implemented.

The April 25, 2006, biological opinion referred to in the comment was merely a draft biological opinion. Because consultation with USFWS is ongoing, further discussion in the FEIR/FEIS is not warranted.

The comment also requests a more detailed habitat map of the proposed action and increased preservation alternatives, to more clearly weigh impacts.

Exhibit 3.10-1 in the 2008 RDEIR/SDEIS contains a detailed map of the habitat types currently existing at the project site. The 2008 RDEIR/SDEIS (pages 3.10-1 to 3.10-17) contains a detailed discussion of the biological resources at the site. The 2008 RDEIR/SDEIS then discusses the potential impacts of each alternative on these resources. This analysis is sufficient to weigh the impacts of the alternatives.

EPA-17

The comment states that it is unclear how the proposed project will be designed with the pedestrian first in mind, as specified in the City General Plan.

The proposed Rio del Oro land use plan is generally consistent with the land use and smart growth provisions of the Land Use Element of the City General Plan as well as the “Conceptual Land Plan for the Rio del Oro Planning Area” (see City General Plan Figure LU-26, page 80). The proposed Rio del Oro land use plan includes two designated Village Commercial sites, one designated Local Town Center, and two designated Regional Town Centers. High Density Residential (18.1 to 40 dwelling units per acre [du/ac]), Medium Density Residential (6.1 to 18.0 du/ac), and Single Family Residential (2.1 to 6.0 du/ac) uses are located immediately adjacent to these sites to promote pedestrian use (see 2006 DEIR/DEIS Exhibit 2-4). This is consistent with the City General Plan’s smart-growth concepts promoting pedestrian use, as described on pages 7–14 of the City General Plan’s Land Use Element. As identified in the DEIR for the City General Plan, this overall land use pattern, consistent with the SACOG Blueprint,

would provide for a decrease in total vehicle miles traveled outside of the city (see City General Plan DEIR Table 4.5-5 on page 4.5-21).

The comment also notes that the DEIS does not justify why the High Density Alternative would develop the same amount of land as the proposed project.

The alternatives identified in the 2006 DEIR/DEIS are intended to address the range of potential land use development of the site in order to provide adequate disclosure of methods to avoid or minimize environmental impacts of the project, as required by CEQA and NEPA. The 2006 DEIR/DEIS includes an “Impact Minimization Alternative” that consists of a reduction of the development footprint of the site, while retaining a substantial amount of the development proposed under the Rio del Oro Specific Plan.

EPA-18

The comment notes that community-designed strategies for smart growth design of planned communities can achieve economic goals while meeting environmental measures and then details some of these measures. The comment notes that no information is included on the feasibility of the roadway improvement measures and feeder bus services for the area included in the Metropolitan Transportation Plan for 2025 (MTP 2025).

The proposed Rio del Oro Specific Plan provides roadways that would be incorporated into the City’s transit system as set forth in the *Transit Master Plan* (August 2006), which further refines the planned transit system under the City General Plan. This system includes the establishment of a “Signature Transit Route” for potential streetcar use along Rancho Cordova Parkway, neighborhood transit service in the project area associated with White Rock Road and Zinfandel Drive, and “bus rapid transit” routes along Sunrise Boulevard, White Rock Road, Rancho Cordova Parkway, Grant Line Road, and Jackson Road. As part of this, the project would be required to participate in capital improvements for transit as set forth in Mitigation Measure 3.14-3a of the 2006 DEIR/DEIS.

The MTP 2025 identifies implementation of bus rapid transit on the Sunrise Boulevard corridor, and has earmarked approximately \$20 million for this improvement. Sacramento County’s (County’s) mobility study also identifies various treatments for Sunrise Boulevard in this area. Additionally, the MTP 2025 has earmarked roadway capacity improvements on Sunrise Boulevard (\$10 million to widen the roadway from north of Douglas Road to Grant Line Road) and Zinfandel Drive (\$4.79 million to construct a new roadway from Douglas Road to the current south terminus). Please note that these improvements have been identified as Tier I (funded) improvements.

In addition to the above referenced improvements, capacity expansion to Mather Field Road, Zinfandel Drive, and Sunrise Boulevard have all been identified as conditions of approval to various specific plans or are in the City’s or County’s impact fee programs.

It should be noted that, because these improvements are included in a variety of funding mechanisms, the assessment contained in the 2006 DEIR/DEIS assumes that they are feasible as they were assumed to be fully funded at the time the EIR/EIS assessment commenced.

EPA-19

The comment expresses concern that not all measures have been examined that could minimize unavoidable impacts. The comment also suggests incorporating “Low Impact Development” (LID) principles into the design of the Rio del Oro project and lists specific modifications: including 100-foot minimum buffer zones from avoided waters, minimizing impervious cover, establishing a new legal status for avoidance areas, giving an independent third party responsibility for and oversight of the preserve areas,

analyzing the practicability of front-loaded streets, siting detention basins off-stream where practicable, and ensuring that recreational trails are placed outside buffer zones. Finally, the comment requests more information about transit options and plans for the area to mitigate further congestion and significant air quality impacts from an increase in vehicle miles traveled.

The specific LID features to be incorporated to minimize impacts on aquatic resources will be determined as part of the specific design. The commenter's suggested LID modifications will be taken into consideration when final design features are determined.

The Rio del Oro project is planned to be designed and constructed consistent with the requirements of the *Stormwater Quality Design Manual for the Sacramento and South Placer Regions* (2007) (Stormwater Manual), published by the Cities of Citrus Heights, Elk Grove, Folsom, Galt, Rancho Cordova, Roseville, and Sacramento and the County of Sacramento. The Stormwater Manual provides locally adapted information for design and selection of three categories of stormwater quality control measures: source control, runoff reduction, and treatment control. The Stormwater Manual identifies best management practices (BMPs) and LID principles to follow to achieve stormwater quality, conserve water, and promote greater runoff treatment efficiencies through "green infrastructure."

Several LID features would likely be incorporated: disconnected impervious areas, increased pervious areas, maximized street efficiency (less pavement), vegetated swales, and if soils are appropriate, infiltration features such as porous pavement, infiltration swales, infiltration basins, and typical BMPs.

Project features consistent with the Stormwater Manual include its water quality ponds and its retention or detention ponds for water quality, peak flow control, and volume control outside of the preserve. Appropriate runoff controls such as berms, storm gates, detention basins, overflow collection areas, filtration systems, and sediment traps would be used to control siltation and the potential discharge of pollutants. These features would also be designed to meet the performance standards described in Section 3.4, "Drainage, Hydrology, and Water Quality," of the 2006 DEIR/DEIS.

The Rio del Oro Specific Plan and Master Drainage Study details these features. Stormwater runoff generated within the project site would be collected in new drainage systems that would include water-quality treatment measures. Three proposed detention basins would detain peak flows and ensure that the project would meet water quality objectives for long-term urban runoff.

The wetland preserve has also been configured to preserve the hydrologic integrity of the vernal pools and crustacean habitat. A hydrologic analysis of the topography of the preserve area was used to establish the preserve boundary. The preserve would maintain a buffer of 250 feet from the proposed development and would maintain the watersheds necessary to support preserved habitat.

The quality and function of the proposed compensatory wetlands would not be compromised by project-related stormwater runoff. The project is designed to direct flows to the drainage corridors that would be created throughout the project site. These corridors would range from 200 feet to 300 feet wide and would consist of meandering low-flow channel, adjacent wetlands, riparian plantings, and a bike trail.

The wetlands created within the drainage corridors and detention basins would be consistent with the *Guiding Principles for Constructed Treatment Wetlands* (EPA 2000). This guidance states that “[i]n general, wetlands constructed or restored for the primary purpose of treating wastewater will not be recognized as compensatory mitigation to offset wetland losses authorized under federal regulatory programs.” The drainage corridors include water quality treatment swales and basins, for which no compensatory mitigation credit is proposed. These swales and basins would serve to filter and treat stormwater and nuisance flows before being released into the proposed low-flow channels and adjacent wetland habitat proposed to be created. The increased flows caused by the proposed increase in impervious surfaces would be directed to these drainage corridors and not connected to the vernal pool habitat proposed to be permanently preserved within the 505-acre vernal pool preserve. Because the existing site has been heavily mined, the wetlands in the proposed drainage corridors would represent an improvement of wetland function and aquatic environment over baseline conditions, and historical function would be restored. Note that the wetland MMP no longer includes construction of seasonal wetlands within the 26-acre detention basin.

The drainage corridors would also be managed as required by an agency-approved O&M plan, which would include measures to manage invasive nonnative species. The on-site vernal pool preserve would not receive any nuisance flows. Additionally, flows from these drainage corridors would not enter Morrison Creek within or upstream of the proposed vernal pool preserve, with two exceptions: a bioswale at Rancho Cordova Parkway and a water quality basin adjacent to the east side of Americanos Boulevard. Because of low spots at Rancho Cordova Parkway, some runoff would drain into a vegetated water quality swale that would be constructed adjacent to the road within the preserve. This water treated by the water quality swale would be discharged into the preserve. LIDAR analysis confirms that this discharge would not affect the vernal pools within the preserve. Adjacent to the east side of Americanos Boulevard, stormwater runoff, and nuisance flows from a single-family residential area would be directed into a water quality basin, treated, and subsequently discharged into Morrison Creek at the upstream end of the preserve.

See responses to comments EPA-17 and EPA-18 regarding transit options, as well as the *Rio del Oro Air Quality and Emissions Reduction Plan*, which describes plans to mitigate the air quality impacts of project development.

The Rio del Oro Specific Plan is consistent with the City General Plan from a land use perspective. The City General Plan’s land use component is consistent with SACOG’s preferred Blueprint alternative, which was developed to reduce vehicle miles traveled and minimize impacts related to congestion and air quality.

The specific plan accommodates the City General Plan’s Circulation Element and fee program, which identifies transit opportunities along Rancho Cordova Parkway, links to existing and future light-rail stations, and potential future bus routes on area roadways.

EPA-20

The comment notes the uses for which Morrison Creek is subject to Central Valley RWQCB regulation and the contaminants of which the creek was found to have elevated levels. The comment states that the FEIS should address the additional impacts of the proposed developments on Morrison Creek, include updated information on sampling results, and include mitigation as appropriate.

The information requested by the commenter regarding sampling results is contained on pages 3.4-8 through 3.4-11 of the 2006 DEIR/DEIS. An analysis of project-related effects

on water quality is contained in 2006 DEIR/DEIS Impacts 3.4-3 (construction-related effects) and 3.4-4 (long-term effects from urban runoff). As specified on pages 3.4-25 and 3.4-29 of the 2006 DEIR/DEIS, the mitigation measures associated with these impacts would reduce the impacts of project development on water quality in Morrison Creek to a less-than-significant level.

SECTION B

State Agencies

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 18, 2006

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

RECEIVED BY

DEC 28 2006

PMC

Dear Mr. Angeli:

Re: SCH #2003122057; Rio Del Oro Specific 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. Of particular concern is the impact of the increased traffic on the existing at-grade highway-rail freight rail crossing on Sunrise Blvd.

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
Environmental Specialist
Rail Crossings Engineering Section
Consumer Protection and Safety Division

cc: Jim Smith, UP

CPUC - 1

CPUC-1

The comment recommends that the Rio del Oro project be planned with consideration of the safety of the rail corridor in mind, including grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings to accommodate increased traffic volumes, and fencing to limit access onto the railroad right-of-way. The commenter expresses concern about the impact of increased traffic on the existing at-grade highway-rail freight rail crossing on Sunrise Boulevard.

The commenter is correct in stating that the Proposed Project Alternative would add traffic to the existing at-grade rail crossing on Sunrise Boulevard. Mitigation Measure 3.14-7w requires the project applicant(s) to contribute funding toward the Rancho Cordova Parkway interchange with U.S. Highway 50 (U.S. 50), which would have a grade-separated rail crossing and should shift some traffic from the existing rail crossing on Sunrise Boulevard. However, freight rail service in this area is infrequent, and the City has no plans to add vehicle grade separation because a grade separation is already in place for the existing light rail line.



California
Department of
Health Services

SANDRA SHEWRY
Director

State of California—Health and Human Services Agency
Department of Health Services



ARNOLD SCHWARZENEGGER
Governor

December 21, 2006

RECEIVED BY

DEC 28 2006

PMC

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

RE: Rio del Oro Specific Plan – SCH#2003122057

The California Department of Health Services (CDHS) is in receipt of the Draft Environmental Impact Report for the above project.

If the City of Rancho Cordova plans to develop a new water supply well or make modifications to the existing domestic water treatment system to serve the Rio del Oro project site, an application to amend the water system permit must be reviewed and approved by the CDHS Sacramento District Office. These future developments may be subject to separate environmental review.

DHS - 1

Please contact the office at (916) 449-5600 for further information.

Sincerely,

Bridget Binning
California Department of Health Services
Environmental Review Unit

December 21, 2006
Mr. Patrick Angell
Page 2

Cc:

Terry Macaulay, District Engineer
CDHS Sacramento
1616 Capitol Avenue, MS 7407
Sacramento, CA 95899

State Clearinghouse
P.O. Box 3044
Sacramento, CA 95812-3044

DHS-1

The comment states that if the City plans to develop a new water supply well or modify the existing domestic water treatment system to serve the Rio del Oro project site, an application to amend the water system permit must be reviewed and approved by the California Department of Health Services' Sacramento District office, and these future developments may be subject to separate environmental review.

The comment is noted. The project does not propose to alter any existing well or treatment facilities, but would connect to existing water distribution facilities in the project area (see Section 3.5, "Utilities and Service Systems—Water Supply," of the 2008 RDEIR/SDEIS).

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DEPARTMENT OF TRANSPORTATION
DIVISION OF AERONAUTICS – M.S.#40
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Be energy efficient!*

RECEIVED BY

JAN 11 2007

PMC

January 2, 2007

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

Dear Mr. Angell:

Re: City of Rancho Cordova's Draft Environmental Impact Report for Rio del Oro Specific Plan;
SCH# 2003122057

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public and special use airports and heliports. The following comments are offered for your consideration.

The proposal is for a mixed-use development on 3,828 acres just northeast of Mather Airport, beneath the extended centerlines to runways 22R and 22L. Build-out of the project would occur in five phases over a 25-30 year period. The proposal includes 11,601 residential dwelling units on 1,920 acres; 153 acres of shopping centers; 86 acres of business park; 282 acres of industrial park; 63 acres of neighborhood parks; 54 acres of private recreation; a 507-acre wetland preserve; 155 acres of drainage parkways; 39 acres of detention basins; a 78 acre combined middle school/high school, a separate middle school on 20 acres and six elementary schools on 54 acres.

Elementary school (76) appears to be within two miles of one of the Mather Airport runways. Education Code, Section 17215 requires a school site investigation by the Division prior to acquisition of land for a proposed school site located within two miles of an airport runway. Our recommendations are submitted to the State Department of Education for use in determining acceptability of the site. The Division's school site evaluation criteria is available on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/htmlfile/regulations.php>.

Aero - 1

According to page 3-1-24 of the Draft Environmental Impact Report (DEIR), no residential development will occur in the 60-decibel (dB) or greater Community Noise Equivalent Level (CNEL). We concur. In addition, the DEIR also states on page 3.16-13 that "new residential development within the MAPA (Mather Airport Policy Area), but outside the 60-dBA CNEL contour, may be approved but will be subject to the following conditions:

Aero - 2

- ▶ provision of minimum noise insulation to achieve 45 dB within new residential dwellings, including detached single-family dwellings, with windows closed in any habitable room;

Mr. Patrick Angell
January 2, 2007
Page 2

- ▶ notification in the public report prepared by the California Department of Real Estate disclosing to prospective buyers that the parcel is located within the MAPA; and

an aviation easement prepared by the County Counsel's Office, granted to the County, recorded with the County Recorder, and filed with the County Department of Airports. Such an aviation easement shall acknowledge the property location with the MAPA and shall grant the right of flight and unobstructed passage of all aircraft into and out of Mather Airport."

Aero - 2
cont.

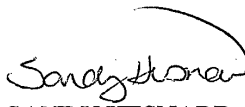
Please note, Section 11010 of the Business and Professions Code and Sections 1102.6, 1103.4, and 1353 of the Civil Code (<http://www.leginfo.ca.gov/calaw.html>) address buyer notification requirements for lands around airports. Any person who intends to offer land for sale or lease within an *airport influence area* is required to disclose that fact to the person buying the property. This does not only apply to residential development.

The protection of airports from incompatible land use encroachment is vital to California's economic future. Mather Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports in California is both a local and a state issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

These comments reflect the areas of concern to the Caltrans Division of Aeronautics with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our district office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,



SANDY HESNARD
Aviation Environmental Specialist

c: State Clearinghouse, Mather Airport, SACOG-ALUC

AERO-1

The comment states that a planned elementary school appears to be within 2 miles of one of the Mather Airport runways, and notes that Education Code Section 17215 requires a school site investigation by the California Department of Transportation (Caltrans), Division of Aeronautics, before land is acquired for a proposed school site located within 2 miles of an airport runway. The comment directs the City to the Caltrans Division of Aeronautics' school site evaluation criteria.

Implementation of development Phase 1 would include constructing an elementary school west of Sunrise Boulevard, north of the proposed Rio del Oro Parkway, and east of the proposed Rancho Cordova Parkway. Mather Airport is approximately 2 miles from the proposed elementary school site. The project applicant(s) have agreed to ensure that the school site is outside the 2-mile radius from the end of the runway.

AERO-2

The comment concurs with the statement in the 2006 DEIR/DEIS that no residential development will occur in the 60 A-weighted decibel (dBA) or greater community noise equivalent level (CNEL) area.

The comment is noted.

The comment also notes that, as discussed in Section 11010 of the Business and Professions Code and Sections 1102.6, 1103.4, and 1353 of the Civil Code, any person who intends to offer land for sale or lease within an airport influence area must disclose that fact to the buyer. The comment states that this requirement applies to all new development within the Mather Airport Policy Area (MAPA) but outside the 60-dBA CNEL contour, not just to new residential development as stated in the 2006 DEIR/DEIS.

The comment is noted. Mitigation Measure 3.16-5 (2006 DEIR/DEIS page 3.16-32) requires notification to prospective buyers of all parcels located within the Mather Airport Policy Area.

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Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Cynthia Bryant
Director

January 23, 2007

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

Subject: Rio del Oro Specific Plan
SCH#: 2003122057

Dear Patrick Angell:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 22, 2007, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

SCH - 1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2003122057
Project Title Rio del Oro Specific Plan
Lead Agency Rancho Cordova, City of

Type EIR Draft EIR
Description The Rio del Oro project would permit a mixed-use development on approximately 3,828 acres in Rancho Cordova. Elliott Homes is seeking specific development entitlements (e.g., tentative subdivision maps) as part of the project, GenCorp is seeking overall development entitlements, but has not proposed specific development entitlements necessary for immediate or short-term development as part of this proposal. In addition to local development entitlement requests, the project applicants are requesting authorization from U.S. Army Corps of Engineers to place dredged or fill material into waters of the United States.

Lead Agency Contact

Name Patrick Angell
Agency City of Rancho Cordova
Phone (916) 851-8700 **Fax**
email
Address 2729 Prospect Park Drive
City Rancho Cordova **State** CA **Zip** 95670

Project Location

County Sacramento
City
Region
Cross Streets Sunrise Boulevard and Douglas Road
Parcel No. 072-0370-071, 072-0370-070
Township **Range** **Section** **Base**

Proximity to:

Highways 50
Airports Mather Airport
Railways UPRR, Regional Transit
Waterways Folsom South Canal
Schools
Land Use Rio del Oro Planning Area

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Cumulative Effects; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Schools/Universities; Septic System; Sewer Capacity; Social; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Parks and Recreation; Native American Heritage Commission; Office of Emergency Services; Department of Housing and Community Development; Department of Health Services; Department of Fish and Game, Region 2; Department of Water Resources; Department of Conservation; California Highway Patrol; Caltrans, District 3; Caltrans, Division of Aeronautics; Department of Toxic Substances Control

Date Received 12/07/2006 **Start of Review** 12/08/2006 **End of Review** 01/22/2007

Note: Blanks in data fields result from insufficient information provided by lead agency.

SCH-1

The comment acknowledges that the Rio del Oro project has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA, and includes a list of state agencies that reviewed the 2006 DEIR/DEIS.

The comment is noted. The City acknowledges the assistance of the State Clearinghouse in facilitating participation by the appropriate state agencies in the review process for the Rio del Oro 2006 DEIR/DEIS.

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California Regional Water Quality Control Board Central Valley Region



Karl Longley, ScD, P.E., Chair

Linda Adams
Secretary for
Environmental
Protection

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11020 Sun Center Drive, Suite 200, Rancho Cordova 95670-6114
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Arnold Schwarzenegger
Governor

2 February 2007

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

Anna Sutton
U.S. Army Corps of Engineers,
Sacramento District
Regulatory Branch
1325 J Street, Room 1480
Sacramento, CA 95814-2922

RIO DEL ORO SPECIFIC PLAN, DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT

Thank you for the opportunity to review the subject draft EIR. Regional Board staff reviewed the document and a portion of our comments is provided in this letter. A subsequent letter is being drafted by the Stormwater Section of our office regarding the adequacy of the report in addressing wetland mitigation and stormwater runoff issues. That letter will follow shortly. Our initial set of comments is as follows:

A General Comments:

1. The report needs to discuss the potential adverse health affects associated with natural occurring levels of arsenic that are present on the property. Only in that manner can it be determined if mitigation measures are needed to allow construction and inhabitation of the property. A copy of pertinent sections of a report regarding the background metal concentrations on the property has been previously provided to City Planning staff. See specific comment B13, below.
2. Additional evaluation of the short-term and long-term water supply issues needs to occur, as it is not certain that the supplies that are being relied upon will be able to serve the project. See specific comments B2 through B4, below.
3. A figure depicting the locations of the areas of potential/known soil contamination along with the proposed development for those areas should be included in the document. This figure would be useful in helping the reader determine whether sensitive development (residences, schools, etc.) are appropriately placed in regards to potential exposure to hazardous wastes.
4. The proposed development of the Alpha/IOC-1 Complex (Area 44) is designated as private recreation. What does private recreation entail? The area should not be used for activities that will present adverse impacts onto the adjacent wetlands preserve.

CVRWQCB-1-1

CVRWQCB-1-2

CVRWQCB-1-3

CVRWQCB-1-4

Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

Activities such as golf courses discharge pollutants that are incompatible with a wetland preserve.

CVRWQCB-1-4 cont.

B Specific Comments:

1. Page 3.4-29, Impact 3.4-5. What is the net reduction in groundwater recharge associated with infiltration of rainfall caused by the proposed project when compared to the current undeveloped conditions? Was this taken into account in developing the estimate of a net recharge increase due to the importation of surface water supplies and the infiltration of irrigation water by the proposed project?

CVRWQCB-1-5

2. Page 3.5-1, Section 3.5.1, paragraph 5. The short-term water supply may need to be available past 2011 as Sacramento County may not be able to complete its Zone 40 water supply project by that time. In addition, the long-term water supply to be provided by that project may not be available as the CEQA document for Sacramento County's Eastern Sacramento County Water Supply project is still undergoing review at is should not be assumed that the supply of water from that proposed project can be counted on at this time for supplying the Rio Del Oro project. This fact is even stated in Appendix D of the Rio Del Oro CEQA document

CVRWQCB-1-6

3. Page 3.5-8, Impact 3.5-1, first paragraph. This impact deals with not having permanent water supply facilities in place by 2010. In previous portions of the document it is stated that the supplies will not be available until 2011. As stated above, there project may not be completed even by 2011 and the supply of water cannot be guaranteed until that project has completed CEQA.

4. Page 3.5-8, Impact 3.5-1, Options for Temporary Water Supplies. This section provides three potential water supply projects to supply the temporary water needed by the project. Two of those options, B and C, would likely not be available for the project as needed in summer/fall 2007. For Option B, there are many regulatory and public hurdles that would need to be overcome to allow using wellhead treatment systems on Golden State Water Company wells that have been taken out of service due to pollution. The supply under Option B would likely not be available for a number of years at best. As for Option C, there are even more significant issues than are present under Option B that will need to be addressed as the treatment plant and extraction wells, and the operators of the GET J facility, will need to be able to meet the requirement of the Department of Health Services (DHS). As the system stands today, we would recommend to DHS to not allow the use of the effluent from GET J as a direct source of potable water supply. It needs to be demonstrated that Option A is sufficient by itself for the short-term project needs.

CVRWQCB-1-7

5. Page 3.5-11, Impact 3.5-2. Aerojet is under orders to remediate the polluted groundwater not only from the United States Environmental Protection Agency (USEPA) and Department of Toxic Substance Control (DTSC), but also from the Regional Water Quality Control Board, Central Valley Region (Regional Board).

CVRWQCB-1-8

6. Page 3.5-12, Impact 3.5-2, first paragraph. Aerojet does not demonstrate to the USEPA and DTSC that it meets NPDES requirements. The NPDES permit is issued by the

CVRWQCB-1-9

- Regional Board and Aerojet must demonstrate to our office that the permit limits are being met. Sacramento County may have stated that they will not accept the water unless it meets requirements, however, unless the water meets the requirements there would be no water discharged to the American River from the treatment systems that the County could accept. CVRWQCB-1-9 cont.
7. Page 3.5-14, Impact 3.5-2, first paragraph. As stated above, the determination of whether or not the water supplies from the Remediated Water Supply Project will be available until after the CEQA document is completed for that project. CVRWQCB-1-10
8. Page 3.5-15, Impact 3.5-2, first paragraph. The purple-pipe system for use of reclaimed water should be provided not only for all "major landscaping and open space areas" but for non-potable purposes at all residential, commercial and industrial buildings and landscaping. It would appear to be ludicrous to not utilize the effluents from the existing and planned major groundwater extraction and treatment systems in the vicinity of the project for supplying water for non-potable purposes. A significant portion of the 20,000 acre-feet of water per year would not have to be sent down to the Sacramento River, withdrawn from the river at Freeport, transported across Sacramento County to the Vineyard treatment plant, and then pipe the water from that facility up to Rio Del Oro development. Direct utilization of water from the GET facilities for non-potable purposes is a more efficient use of the water. In the future, as available water from the GETs is potentially reduced, the area will be able to accept additional reclaimed water from the Sacramento Regional County Sanitation District. Even if the GET water is not directly used, the purple piping will allow the sanitation district to reclaim a larger portion of its flow in the future. CVRWQCB-1-11
9. Page 3.10-4, Exhibit 3.10-2. The figure does not correctly identify the location of the former White Rock Road Dump No.1. It should be shown to be located approximately 2000 feet southeast of the former By-Dry facility along White Rock Road. CVRWQCB-1-12
10. Page 3.10-32, Impact 3.10-2, third paragraph. This paragraph states that the 57 acres of cottonwood-willow riparian forest on the site present the highest habitat value of all the riparian habitat types present. As this forest is adjacent to the proposed wetland preservation area, we recommend that the wetland preservation area be expanded to include this cottonwood-willow riparian forest. CVRWQCB-1-13
11. Exhibit 3.13-1. This exhibit depicts areas that are subject to an RI/FS. The Central Area OU is not depicted on the figure and includes all of the soils between the known source areas shown on the figure, excluding the Elliot Homes property to the west listed as "excluded area." CVRWQCB-1-14
12. Page 3.13-5, Section 3.13-1, third paragraph. The last sentence states that USEPA has delegated its authority on the soils under the ISEO. Where is this documented that the USEPA has delegated its authority in this manner? USEPA is letting the State (Regional Board and DTSC) address the soil contamination on the project site that could be associated, at least in part, to the Aerojet Superfund site north of the Rio Del Oro project. Those sites include the former GET F Sprayfield and the Propellant Burn Area. In addition, not all of the groundwater contamination on the project site that is CVRWQCB-1-15

emanating from the Superfund site will be dealt with under the cleanup under the Superfund program. A portion of the groundwater contamination from the Superfund site will be handled by the cleanup of the IRCTS site.	CVRWQCB-1-15 cont.
13. Page 3.13-6, Section 3.13.1, Site Contamination. The initial parts of this section include paragraphs on residual mercury, and lead and asbestos. An additional paragraph should be added to talk about arsenic, as there are significant concentrations of arsenic in the soils. The paragraph would be similar to those on mercury and lead by discussing the potential risks associated with arsenic. As provided in our comments on several other CEQA documents (most recently for the Sunridge Specific Plan) recently being prepared by the City of Rancho Cordova, the concentrations of arsenic in the soils at the site (likely as well in properties in the vicinity of the site) are three orders of magnitude above the Preliminary Remediation Goal of 0.062 mg/kg established by USEPA and the California Human Health Screening Level of 0.07 m/kg. The average background concentration of arsenic is 6.8 mg/kg, with a maximum value of 15 mg/kg. As arsenic concentrations are naturally occurring, remediation of arsenic by those Aerojet and/or McDonnell-Douglas is not required. Nevertheless, the arsenic concentrations need to be evaluated an a determination made as to whether or not any measures need to be required prior to allowing the property to be used for residential or commercial purposes.	CVRWQCB-1-16
14. Page 3.13-9, Section 3.13.1, Municipal Landfill. It is proposed that the landfill will consolidate a relatively small amount of material from White Rock Road Dump No.2 (on Aerojet-property north of White Rock Road) with the waste materials at the Municipal Landfill (White Rock Road Dump No. 1). This consolidation will be done pursuant to waste discharge requirements issued by the Regional Board. The projected end-use is as stated.	CVRWQCB-1-17
15. Page 3.13-10, Section 3.13.1, By-Dry site. The By-Dry site is part of the Central Area Operable Unit.	CVRWQCB-1-18
16. Page 3.13-10, Section 3.13.1, Cleanup Processes. The Cleanup and Abatement Order discussed in this section addresses perchlorate. If the perchlorate is on the IRCTS property, then it too is covered by the Order.	CVRWQCB-1-19
17. Page 3.13-11, Section 3.13.1, Western Groundwater Operable Unit. The reader should be informed that the WGOU is being remediated under USEPA and Regional Board orders as part of the Aerojet Superfund site remediation. Under a separate IRCTS project, Aerojet is evaluating the construction of extraction wells downgradient from the former GET F Sprayfield within the WGOU.	CVRWQCB-1-20
18. Page 3.13-20, Impact 3.13-2. Aerojet and the State will also maintain the ability to operate and maintain groundwater extraction wells, conveyance piping and treatment facilities on the site. The mitigation measures only discuss monitor wells.	CVRWQCB-1-21
19. Appendix D, page 1, paragraph 2. It is stated that the revised Water Supply Assessment (WSA) will supersede that adopted by SCWA's Board of Directors. Do	CVRWQCB-1-22

they have to adopt the revised WSA in order for it to be valid or does certification of the CEQA document validate the WSA?

CVRWQCB-1-22 cont.

20. Appendix D, page 2, first bullet. The CEQA process for the RWSP is not yet completed. The date provided in this bullet is Summer 2006.

CVRWQCB-1-23

If you have questions regarding these comments, please call me at (916) 364-4625 or by e-mail at amacdonald@waterboards .ca.gov.

ALEXANDER MACDONALD
Senior Engineer

cc: Ed Cargile, Department of Toxic Substances Control, Sacramento
Rodney Fricke, Aerojet-General Corporation, Sacramento

CVRWQCB-1-1

The comment states that the 2006 DEIR/DEIS needs to discuss the potential adverse health effects associated with naturally occurring levels of arsenic that are present on the property, and refers to an accompanying report regarding background metal concentrations on the property that was previously submitted to City Planning staff.

Please see new Appendix S, attached to this FEIR/FEIS, *Memorandum Prepared by Lee Shull of Montgomery, Watson, Harza to David Suderquist of Youngdahl Consulting Regarding Arsenic in the Soil at the Rio del Oro Site (2007)*. In his 2007 memorandum, Dr. Shull summarizes available data regarding the naturally occurring arsenic at the project site and provides the following conclusions:

1. The human health screening level values of arsenic are very conservative indicators of theoretical upper-bound cancer risk and therefore should be used with caution in risk management decision making.
2. Because the bioavailability of naturally occurring arsenic in soil is generally low, the amount of arsenic absorbed into the body is thereby reduced, resulting in lowered potential for adverse health impacts.
3. In accordance with EPA guidance and the National Contingency Plan, human exposure levels to carcinogenic substances that result in a theoretical upper-bound cancer risk of less than 1×10^{-4} do not pose an unacceptable risk.

The concentrations of measured arsenic in the soil on the project site are an average of 6.8 mg/kg and maximum of 15 mg/kg, which are within the range of theoretical upper-bound cancer risk of 1×10^{-4} , which is considered by EPA to be safe and protective of human health. Therefore, the impact would be less than significant and no mitigation measures are required.

CVRWQCB-1-2

The comment questions whether short-term and long-term water supplies being relied upon would be able to serve the Rio del Oro project, and states that additional evaluation is needed.

Section 3.5, "Utilities and Service Systems—Water Supply," was recirculated in April 2008 and provided additional information evaluating short- and long-term water supplies to serve the project. (See 2008 RDEIR/SDEIS, pages 3.5-1 through 3.5-95.) For specific responses to the commenter's concerns, see responses CVRWQCB-1-6 and CVRWQCB-1-7.

CVRWQCB-1-3

The comment states that the 2006 DEIR/DEIS should include a figure depicting the locations of the areas of potential/known soil contamination along with the proposed development for those areas.

The information requested by the commenter is contained in Exhibits 2-4 and 3.13-1 of the 2006 DEIR/DEIS.

CVRWQCB-1-4

The comment asks what uses will be allowed in Alpha/IOC-1 Complex (Area 44), and states that the area should not be used for activities that will present adverse impacts onto the adjacent wetland preserve.

The uses within the private recreation area would be compatible with the remedial action plan approved by DTSC. The potential uses within the private recreation area include but are not limited to a golf practice and instructional facility, private aquatic facility, equestrian facility, and similar uses. Final uses have not been selected and would be subject subsequent environmental review. Area 44 is hydrologically disconnected from the vernal pool preserve area. The parcel drains to the northwest, away from the proposed preserve located to the south.

CVRWQCB-1-5

The comment asks what would be the net reduction in groundwater recharge associated with infiltration of rainfall caused by the proposed project when compared to current conditions. It asks whether this was taken into account when a net increase in recharge was estimated (in Impact 3.4-5) based on importing surface water supplies and infiltration of irrigation water.

The net reduction in groundwater recharge associated with rainfall infiltration was taken into account when the net increase in recharge was estimated in Impact 3.4-5. Please see new Appendix T, attached to this FEIR/FEIS, *Rio del Oro Development Project, Groundwater Impact Evaluation, Technical Memorandum* prepared by Water Resources & Information Management Engineering, Inc. (WRIME) in 2005.

CVRWQCB-1-6

The comment states that short-term water supplies may need to be available past 2011 because the County may not be able to complete its Zone 40 water supply project by that time. The comment further states that it should not be assumed that water from the proposed Eastern Sacramento County Water Supply Project (which is still undergoing CEQA review) can be counted on to supply the Rio del Oro project. The comment also notes that the 2006 DEIR/DEIS is inconsistent regarding when permanent water supplies will be in place, in that Impact 3.5-1 says that the facilities will not be in place until 2010, whereas other parts of the document say that the supplies will not be available until 2011. The commenter reiterates that both dates may be incorrect because the supply of water cannot be guaranteed until the CEQA process for the Eastern Sacramento County Water Supply Project has been completed.

As noted on 2008 RDEIR/SDEIS pages 3.5-34 through 3.5-36, GSWC has indicated that it has the ability to supply water for Phase 1A of the project for development up to “600 dwelling units.” The 2008 RDEIR/SDEIS includes a signed letter from Ernest Gisler, the engineering and planning manager at GSWC, stating that GSWC would have water supply adequate to serve the initial phases of development up to 600 dwelling units and that water supplies would be provided by GSWC until long-term water facilities have been constructed by SCWA. (See 2008 RDEIR/SDEIS, page 5-2 [Gisler, Ernest. Engineering and planning manager. Golden State Water Company (formerly Southern California Water Company), Rancho Cordova, CA. July 29, 2005—letter to Russell Davis of Elliott Homes regarding water supply].) As discussed on page 3.5-34 of the 2008 RDEIR/SDEIS, County Improvement Standards (2006) assume 1 gallon per minute (gpm) per dwelling unit; therefore, 600 dwelling units would require a maximum water supply of 600 gpm, or 968 afy. As shown in Table 3.5-9, the total demand for the 861 units in Phase 1A is 902.6 afy. Therefore, the 968-afy water supply available from GSWC would be sufficient to satisfy the demand for Phase 1A. Because GSWC indicated that it would have water supply adequate to serve Phase 1A and that this water would be available until the water facilities necessary for delivery of long-term water by SCWA

(Vineyard Surface Water Treatment Plant [WTP], the Freeport Regional Water Project, and the North Service Area Pipeline Project) are constructed and online, this water supply is considered a reliable permanent source of potable water.

The 2008 RDEIR/SDEIS also discusses Option A and Option B as sources of initial water for the remaining development within Phase 1 (above and beyond the first 600 units in Phase 1A). The discussion of Option A notes that the water would come from GSWC wells that were decommissioned because of groundwater contamination, that the wells contain low concentrations of contaminants that are potentially above the action levels, and that wellhead treatment would be applied to wells that exceed regulatory criteria to treat the water to drinking water standards. The discussion further notes that the California Department of Health Services (recently renamed the California Department of Public Health) would need to approve the wellhead treatment and describes the potential impacts that could be associated with implementing Option A. (See 2008 RDEIR/SDEIS, pages 3.5-36 and 3.5-37.) A similar discussion is provided for Option B, which would involve piping groundwater treated at an Aerojet General Corporation (Aerojet) GET facility to the Coloma/Pyrites WTP to be blended with groundwater and surface water supplies. As discussed on 2008 RDEIR/SDEIS page 3.5-6, Aerojet's GET facilities currently extract and treat contaminated groundwater and are operated under one or more directives from EPA, RWQCB, and DTSC. The discussion regarding Option B also notes that the GET water is treated to drinking water standards and describes the potential impacts that could be associated with implementing Option B. (See 2008 RDEIR/SDEIS, page 3.5-37.) Furthermore, although not legally required because a reasonably likely long-term water supply has been identified, the 2008 RDEIR/SDEIS also identifies potential alternative sources of initial water supply for Option A and Option B and analyzes temporary curtailment of development, which could be implemented if these initial water supplies are not available. (See 2008 RDEIR/SDEIS, pages 3.5-39 and 3.5-40 and Impact 3.5-2 [analyzing the impacts of curtailment of development after Phase 1A for the remaining development of Phase 1 until the long-term water supply is available].)

Moreover, the project does not rely on the approval of the Eastern Sacramento County Water Supply Project (also referred to as the Replacement Water Supply Project [RWSP]) for its long-term water supply. The 2008 RDEIR/SDEIS clarifies that approval of the RWSP is not required for the 7,391 afy of GET water to provide water supply for the project. (See 2008 RDEIR/SDEIR, page 3.5-64.) The purpose of the RWSP was to address diversion and discharge points and facilities to use GET water to replace contaminated water, supply water for development of Aerojet lands, and augment Cosumnes River flows. However, the RWSP was not approved. Even though the RWSP was not approved, the long-term water supply for the project could be provided through Zone 40 water supplies, including 1,500 afy provided through SCWA conjunctive-use supplies, which include surface water entitlements and groundwater, and with 7,391 afy from the 8,900 afy of GET water Aerojet is transferring to SCWA under the 2010 Agreement which comes from the more than 15,000 afy of GET water that Aerojet currently discharges to the American River. (See 2008 RDEIR/SDEIS, pages 3.5-58 through 3.5-64; Master Response 1.)

As identified in Chapter 2 of this FEIR/FEIS, the project applicants are currently not pursuing land use entitlements that would result in the immediate development of the project site.

CVRWQCB-1-7

The comment states that Options B and C for providing temporary water supply to the Rio del Oro project site (described in Impact 3.5-1 of the 2006 DEIR/DEIS) would likely not be available for the project for several years, and that it needs to be demonstrated that Option A is sufficient by itself for short-term project needs. The supply under Option B would likely be unavailable because of the difficulty of allowing use of wellhead treatment systems on Golden State Water Company wells that have been taken out of service due to pollution. Option C presents even more significant issues related to the need to meet the California Department of Health Services' requirements for the treatment plant and extraction wells and the Groundwater Extraction and Treatment (GET) J facility.

As discussed above, the options for short-term water supplies were revised in the 2008 RDEIR/SDEIS. As noted on 2008 RDEIR/SDEIS pages 3.5-34 through 3.5-36, GSWC indicated that it would have water supply adequate to serve Phase 1A (identified as Option A in the 2006 DEIR/DEIS) and that this water would be available until the water facilities necessary for delivery of long-term water by SCWA (Vineyard Surface WTP, the Freeport Regional Water Project and the North Service Area Pipeline Project) are constructed and online. This water supply is considered a reliable source of potable water.

Option A and Option B (identified in similar form as Options B and C in the 2006 DEIR/DEIS) are presented in the 2008 RDEIR/SDEIS as sources of initial water for the remaining development within Phase 1, and the discussions of each option acknowledge the regulatory requirements and health issues associated with implementing these supplies, as well as the potential impacts associated with implementing either option. Furthermore, the 2008 RDEIR/SDEIS also identifies potential alternative sources of initial water supply for Option A and Option B and analyzes temporary curtailment of development, which could be implemented if these initial water supplies are not available. (See 2008 RDEIR/SDEIS, pages 3.5-39 and 3.5-40 and Impact 3.5-2 [analyzing the impacts of curtailment of development after Phase 1A for the remaining development of Phase 1 until the long-term water supply is available].)

CVRWQCB-1-8

The comment states that Aerojet is under orders to remediate polluted groundwater not only from EPA and DTSC (as stated in Impact 3.5-2), but also from the Central Valley RWQCB.

The commenter is correct. As stated under "Local Regulatory Authority for Remedial Activities at the Project Site" on page 3.13-17 of the 2006 DEIR/DEIS, "EPA, DTSC, and the Central Valley RWQCB have regulatory authority over chemicals that originate from the Aerojet NPL [National Priorities List] site and have migrated into groundwater beneath the IRCTS [Inactive Rancho Cordova Test Site, those lands within the area for Rio del Oro proposed development phases 2-5]." The specific text referred to by the commenter in Impact 3.5-2 was deleted during preparation of the 2008 RDEIR/SDEIS.

CVRWQCB-1-9

The comment states that Aerojet must demonstrate to the Central Valley RWQCB, not to EPA and DTSC as stated in Impact 3.5-2 of the 2006 DEIR/DEIS, that its treated groundwater meets National Pollutant Discharge Elimination System (NPDES) requirements. The comment further states that while the County may have stated that it would not accept treated Aerojet groundwater unless it meets all NPDES requirements, there would be no water discharged to the American River from the treatment systems that the County could accept unless the water meets the requirements.

The comment is noted. The specific text referred to by the commenter in Impact 3.5-2 was deleted during preparation of the 2008 RDEIR/SDEIS.

CVRWQCB-1-10

The comment states that the determination of whether the water supplies from the Eastern Sacramento County Water Supply project cannot be made until after the CEQA document is completed for that project.

As discussed in response CVRWQCB-1-6, the 2008 RDEIR/SDEIS clarifies that the 7,391 afy of long-term water for the project is not proposed to be met through the RWSP. (See 2008 RDEIR/SDEIR, page 3.5-64.) The purpose of the RWSP was to address diversion and discharge points and facilities to use GET water to replace contaminated water, supply water for development of Aerojet lands, and augment Cosumnes River flows. The RWSP was a project under which SCWA would receive essentially all of Aerojet's GET water discharged to the American River, and in return, SCWA would have certain obligations to provide water for certain uses. The RWSP is not required to ensure that GET water is discharged to the American River in quantities sufficient for the Rio del Oro development (which is occurring now without the RWSP). The GET water to supply the project would come from the more than 15,000 afy of GET remediated water that Aerojet is already extracting, treating, and discharging to the American River. Aerojet has discharged and will continue to discharge more than 15,000 afy of GET water with or without the approval of the RWSP. The GET water is an available water supply in Zone 40. SCWA and Aerojet have also entered into a new 2010 Agreement under which Aerojet is transferring 8,900 afy of GET water to SCWA. Under the 2010 Agreement, SCWA acknowledges that the 8,900 afy will provide SCWA with sufficient available water to supply the Project. Thus, it remains a reasonably likely supply for the project under the standards set forth in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412. (See Master Response 1.)

CVRWQCB-1-11

The comment states that the purple-pipe system for use of reclaimed water should be provided for all nonpotable purposes at all residential, commercial, and industrial buildings and landscaping, not just for major landscaping and open space areas, and should include direct utilization of water from Aerojet's GET facilities.

Resolution 11-2006, adopted by the City Council on February 6, 2006, includes the use of nonpotable water for "urban irrigation use only in new parks, golf courses, school fields, streetscapes, etc." The *Non-Potable Water Master Plan* (February 2007, updated June 2007) includes the above use, including irrigation of commercial and industrial land uses. These nonpotable water uses are consistent with the Sacramento Regional County Sanitation District's (SRCSD's) "Scenario C."

The *Non-Potable Water Master Plan* discusses the fact that the source of the nonpotable-water system has not been defined yet by the County. The potential supply source includes recycled water from SRCSD and also reclaimed water from the GET facilities. There is potential to use a combination of the supply sources for Rio del Oro depending on the timing and volume available from the sources.

Wood Rodgers has prepared the *Non-Potable Water Study for the Rio del Oro Specific Plan* (February 2007). The areas identified to be served by the nonpotable-water system include those with land uses designated as park, streetscape, landscape corridor, greenbelt, school, commercial, public/quasi-public, private recreation, and business park. This is consistent with the policy adopted by the City.

CVRWQCB-1-12 *The comment notes that the location of White Rock Road Dump No. 1 is not correctly identified on Exhibit 3.10-2 (2006 DEIR/DEIS, page 3.10-4).*

The City and USACE believe that the commenter is actually referring to Exhibit 3.10-1 (2006 DEIR/DEIS, page 3.10-3), which was recirculated in 2008. Exhibit 3.10-1 inadvertently highlighted the dredge pit with rice hull ash as habitat and incorrectly labeled it as White Rock Dump. The dump is located approximately 3,000 feet to the west. As shown in Chapter 5 of this FEIR/FEIS, Exhibit 3.10-1 on page 3.10-3 of the 2008 RDEIR/SDEIS is hereby revised to reflect this correction.

CVRWQCB-1-13 *The comment recommends including the 57 acres of cottonwood willow riparian forest on the site in the wetland preserve area.*

The Impact Minimization Alternative includes the expansion of the hydrologically intact cottonwood willow riparian forest into the area preserved by the project. USACE is evaluating this and other alternatives to determine the LEDPA. In addition, the adoption of the preferred alternative is at the discretion of the City Council; no revisions to the 2006 DEIR/DEIS are warranted.

CVRWQCB-1-14 *The comment states that the Central Area Operable Unit (OU) should have been included in Exhibit 3.13-1 of the 2006 DEIR/DEIS, which depicts areas that are subject to remedial investigation and feasibility study.*

As described on page 3.13-10 of the 2006 DEIR/DEIS, the Central Area OU is composed of the buffer lands that separate the smaller OUs discussed on pages 3.13-7 through 3.13-10 and shown in Exhibit 3.13-1. As shown in Chapter 5 of this FEIR/FEIS, Exhibit 3.13-1 of the 2006 DEIR/DEIS is hereby revised to add a label for the Central Area OU.

CVRWQCB-1-15 *The comment requests documentation of the statement made on page 3.13-5 (third paragraph) of the 2006 DEIR/DEIS that EPA has delegated its authority for soils to DTSC under the Imminent and Substantial Endangerment Order (ISEO) issued by DTSC to Aerojet and McDonnell Douglas Corporation (MDC) in 1991. The comment states that EPA is letting the Central Valley RWQCB and DTSC address the soil contamination on the project site that could be associated with the Aerojet Superfund site north of the Rio del Oro project site. It also states that a portion of the groundwater contamination on the Rio del Oro project site emanating from the Superfund site will be handled by the cleanup of the IRCTS.*

The IRCTS/Rio del Oro property is specifically excluded from the EPA Consent Decree (Superfund) process, except at the Propellant Burn Area, because of Aerojet disposal activities. EPA delegated its authority at the Propellant Burn Area to the ISEO (Fricke, pers. comm., 2006).

CVRWQCB-1-16 *The comment suggests that the discussion of site contamination (by residual mercury, asbestos, and lead) on 2006 DEIR/DEIS page 3.13-6 be expanded to include the potential risks associated with presence of arsenic in soils on the Rio del Oro project site because arsenic concentrations in site soils exceed the Preliminary Remediation Goal established by EPA and the California Human Health Screening Level by three orders of magnitude. The comment notes that remediation of naturally occurring arsenic concentrations by Aerojet and MDC are not required, but that it should be determined whether any measures would be required before allowing the property to be used for residential or commercial purposes.*

See response to comment CVRWQCB-1-1.

CVRWQCB-1-17 *The comment states that a proposal has been made to consolidate a relatively small amount of material from White Rock Road Dump No. 2 (on Aerojet property north of White Rock Road) with the waste materials at the municipal landfill (White Rock Road Dump No. 1), pursuant to waste discharge requirements issued by the Central Valley RWQCB. As stated on page 3.13-10 (“Municipal Landfill [White Rock Dump No. 1]”) of the 2006 DEIR/DEIS, the site is proposed as a park adjacent to an open-space preserve designated under the Rio del Oro project.*

The comment is noted. The City and USACE thank the commenter for the clarification.

CVRWQCB-1-18 *The comment states that the By-Dry site is part of the Central Area OU (described on 2006 DEIR/DEIS page 3.13-10).*

The comment is noted.

CVRWQCB-1-19 *The comment refers to the discussion of the 1997–2000 Cleanup and Abatement Order from the Central Valley RWQCB under “Cleanup Processes” beginning on page 3.13-10 of the 2006 DEIR/DEIS, noting that the order addresses perchlorate. The comment states that if the perchlorate is on the IRCTS property, then it too is covered by the order.*

The comment is noted.

CVRWQCB-1-20 *The comment refers to the discussion of the Western Groundwater Operable Unit (WGOU) on page 3.13-11 of the 2006 DEIR/DEIS, stating that the WGOU is being remediated under EPA and Central Valley RWQCB orders as part of the Aerojet Superfund site remediation. The comment further states that under a separate IRCTS project, Aerojet is evaluating the construction of extraction wells downgradient from the former GET F sprayfield within the WGOU.*

The commenter is correct: Aerojet is still evaluating the potential for source control extraction wells downgradient of the sprayfield.

CVRWQCB-1-21 *The comment refers to Impact 3.13-2 (2006 DEIR/DEIS page 3.13-20) regarding possible delays in development of future land uses from remediation activities. The comment states that Aerojet and the state will maintain the ability to operate and maintain not only monitoring wells (as stated in the impact), but groundwater extraction wells, conveyance piping, and treatment facilities on the site.*

The comment is noted. As shown in Chapter 5 of this FEIR/FEIS, the last sentence of Impact 3.13-2 on page 3.13-20 of the 2006 DEIR/DEIS for the Proposed Project, High Density, Impact Minimization, and No Federal Action Alternatives is hereby revised to read as follows:

Aerojet will also retain right of access to certain properties to operate and maintain the monitoring wells, extraction wells, and conveyance piping; and/or to conduct other remediation activities.

CVRWQCB-1-22 *The comment notes that Appendix D of the 2006 DEIR/DEIS states that the revised water supply assessment (WSA) will supersede that adopted by the board of directors of the Sacramento County Water Agency (SCWA), and asks whether the SCWA board must*

adopt the revised WSA for it to be valid or whether certification of the CEQA document validates the WSA.

SCWA approved the revised WSA on June 6, 2006.

CVRWQCB-1-23

The comment notes that the CEQA process for the Eastern Sacramento County Water Supply Project is not yet completed, while Appendix D of the 2006 DEIR/DEIS anticipated a completion date of summer 2006.

As noted in Master Response 1 and response to comments CVRWQCB-1-6, the RWSP was not approved by the County. However, the RWSP is not required to find that the water supply for the project is reasonably likely because the 15,000 afy of GET water is currently discharged in the American River and available for diversion and up to 8,900 afy of this water is available to supply the project under the under the 2010 Agreement between Aerojet and SCWA. (See Master Response 1.)

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Linda S. Adams
Secretary for
Environmental
Protection

**California Regional Water Quality Control Board
Central Valley Region**

Dr. Karl Longley, Chair



Arnold
Schwarzenegger
Governor

Sacramento Main Office
11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114
Phone (916) 464-3291 • FAX (916) 464-4645
<http://www.waterboards.ca.gov/centralvalley>

6 February 2007

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

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT/DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE RIO DEL ORO SPECIFIC PLAN PROJECT, RANCHO CORDOVA, SACRAMENTO COUNTY

As a Responsible Agency, as defined by CEQA, we have reviewed the Draft Environmental Impact Report (DEIR)/ Draft Environmental Impact Statement (DEIS) for the Rio Del Oro Specific Plan Project. The specific plan supports a combination of employment-generating uses, retail and supporting services, recreational uses, and a broad range of residential uses and associated infrastructure and roads on an approximately 3,828-acre site in eastern Sacramento County, south of U.S. Highway 50, in the city of Rancho Cordova. The property is located south of White Rock Road, north of Douglas Road, and east of Sunrise Boulevard.

The proposed project includes 11,601 residential units at various densities, more than 6,800,000 square feet of employment generating uses (village commercial, shopping center, business park, industrial park); public quasi-public uses; elementary, middle, and high schools; community and neighborhood parks; private recreational uses; storm water detention basins; open space areas and open-space preserves; a drainage parkway; greenbelts; major roads with landscaping; and a wetland preserve/mitigation bank. Several off-site infrastructure facilities (road widening and extensions, sewer interceptors, water and wastewater treatment facilities, wastewater transmission mains, water pipelines and distribution systems and facilities, electrical transmission lines, water tanks) are proposed to serve project development and are addressed in the DEIR/DEIS.

Based on our review of the DEIR/DEIS, we have the following comments regarding the proposed project.

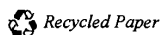
STORM WATER

Post-Construction Storm Water Management

In addition to obtaining an NPDES General Permit for Storm Water Discharges Associated with Construction Activities, NPDES No. CAS000002, Order No. 99-08-DWQ, the project proponent must meet the post-construction storm water requirements of the City of Rancho Cordova. Post construction storm water Best Management Practices (BMPs) are required pursuant to WDRS for Storm Water Discharges from Municipal Separate Storm Sewers Systems (MS4) in cities within Sacramento County, including Rancho Cordova (NPDES Order

CVRWQCB-2-
1

California Environmental Protection Agency



No. CAS082597). Mitigation Measure 3.4-3 in the DEIR/DEIS states that the project proponent shall consult with the City of Rancho Cordova, the State Water Resources Control Board (State Board), and the Central Valley Regional Water Quality Control Board (Water Board) to acquire an NPDES storm water permit. Impact 3.4-4 in the DEIR/DEIS claims the *Master Drainage Study for Rio Del Oro* (Wood Rodgers 2005), and the SWPPP and associated water quality BMPs discussed in Mitigation Measure 3.4-3 appear to meet the requirements established in the County's Municipal Storm Water Permit. The Water Board's general storm water quality conditions are outlined below. We recognize that some of these conditions are addressed in the DEIR/DEIS but are providing all of the conditions below so the project proponent may review all of the conditions in their entirety and obtain a better understanding of our requirements.

1. During the construction phase, the project proponent must employ strategies to minimize erosion and the introduction of pollutants into storm water runoff. These strategies must include the following:
 - (a) the Storm Water Pollution Prevention Plan (SWPPP) must be prepared during the project planning and design phases and before construction.
 - (b) An effective combination of erosion and sediment control Best Management Practices (BMPs) must be implemented and adequately working prior to the rainy season and during all phases of construction for the project.

2. During the post-construction phase, the project proponent must minimize the short and long-term impacts on receiving water quality from the project by considering the following:
 - (a) minimize the amount of impervious surfaces and directly connected impervious surfaces in areas of new development and redevelopment and use on-site infiltration of runoff in areas with appropriate soils where the infiltration of storm water would not pose a potential threat to groundwater quality.
 - (b) implement pollution prevention methods supplemented by pollutant source controls and/or treatment controls.
 - (c) ensure existing waters of the State (i.e. wetlands, vernal pools, ephemeral drainages, creeks) are not used as pollutant source controls and/or treatment controls. Any discharges from the development must be treated prior to being discharged into surrounding wetlands and waters of the State.
 - (d) preserve and, where possible, create or restore areas that provide important water quality benefits, such as riparian corridors, wetlands, and buffer zones.
 - (e) limit disturbances of natural water bodies and natural drainage systems caused by development (including development of roads, highways, and bridges).
 - (f) use existing drainage master plans or studies to estimate increases in pollutant loads and flows resulting from projected future development and require incorporation of structural and non-structural Best Management Practices (BMPs) to mitigate the projected increases in pollutant loads in runoff.
 - (h) identify and avoid development in areas that are particularly susceptible to erosion and sediment loss, or establish development guidance that protects areas from erosion and sediment loss.
 - (i) control post-development peak storm water run-off discharge rates and velocities to prevent or reduce downstream erosion, and to protect stream habitat.

3. The project proponent must ensure that all development provides verification of maintenance provisions for post-construction structural and treatment control BMPs. Verification shall include one or more of the following as applicable:
 - (a) the developer's signed statement accepting responsibility for maintenance until the maintenance responsibility is legally transferred to another party; or
 - (b) written conditions in the sales or lease agreement that require the recipient to assume responsibility for maintenance; or
 - (c) written text in project conditions, covenants and restrictions for residential properties assigning maintenance responsibilities to a home owner's association, or other appropriate group, for maintenance of structural and treatment control BMPs; or
 - (d) any other legally enforceable agreement that assigns responsibility for maintenance of structural or treatment control BMPs.

CVRWQCB-2-
1 cont.

WATER QUALITY CERTIFICATION

As the DEIR/DEIS indicates, if a U.S. Army Corps of Engineers (ACOE) Section 404 permit is required for the project then a Water Quality Certification must be obtained prior to initiation of project activities. Section 401 of the federal Clean Water Act requires any project that impacts waters of the United States (such as streams and wetlands) to file a 401 Water Quality Certification application with the appropriate Regional Water Quality Control Board. The project proponent must certify the project will not violate state water quality standards. Projects include, but are not limited to, stream crossings, modification of stream banks and stream courses, and the filling or modification of wetlands. All projects must be evaluated for the possible degradation or impact to State and Federal waters and, if possible, impacts should be avoided. If the proposed project impacts State and Federal waters and the project proponent is unable to demonstrate that the project was unable to avoid these adverse impacts, water quality certification will most likely be denied. A 401 Certification may also be denied based on significant adverse impacts to State and Federal waters. The project proponent must follow ACOE 404(b)(1) Guidance to assure approval of their 401 Water Quality Certification application. The guidelines are as follows:

CVRWQCB-2-
2

1. **Avoidance** (Is the project the least environmentally damaging *practicable* alternative?)
2. **Minimization** (Does the project minimize any adverse effects to the impacted wetlands?)
3. **Mitigation** (Does the project mitigate to assure a no net loss of functional values?)

If, after avoidance and minimization guidelines are considered and wetland impacts are still anticipated the project proponent shall:

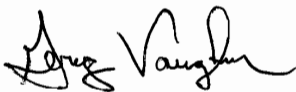
- determine functional losses and gains (both permanent and temporal; both direct and indirect)

- conduct adequate baselines of wetland functions including vegetation, wildlife, hydrology, soils, and water quality
- attempt to create/restore the same wetland type that is impacted within the same watershed
- work within a regional context to maximize benefits for native fish, wildlife, and vegetation, as well as water quality and hydrology
- use native species and materials whenever possible
- document all efforts that are made to avoid and minimize adverse wetland impacts
- be prepared to develop and track performance criteria for 5 to 20 years
- be prepared to show project success based on achieving wetland functions
- if the project fails, be prepared to repeat the same process (via financial assurance), with additional acreage added for temporal losses
- specify how the mitigation project will be maintained in perpetuity and who will be responsible for maintenance

CVRWQCB-2-
2 cont.

The proposed Rio Del Oro Mitigation Plan included in Appendix C of the DEIR/DEIS provides compensatory mitigation through onsite preservation and creation of wetlands at a ratio that is slightly greater than 1:1. The Water Board may require greater mitigation ratios for impacts to state waters during the water quality certification application process, therefore, the project proponent may also want to consider onsite mitigation alternatives with greater mitigation ratios.

If you have any further questions, please contact Robert J. Solecki at 916.464.4684 or me at (916) 464-4742.



Greg K. Vaughn Senior Engineer
Storm Water / Water Quality Certification Unit

CVRWQCB-2-1

The comment states that in addition to obtaining an NPDES General Permit for Storm Water Discharges Associated with Construction Activities, the project applicant(s) must meet the City's postconstruction stormwater requirements. The comment notes that postconstruction stormwater BMPs are required pursuant to waste discharge requirements (WDRs) for Storm Water Discharges from Municipal Separate Storm Sewer Systems (MS4s) in cities within Sacramento County, including Rancho Cordova. The commenter provides all of the Central Valley RWQCB's general stormwater quality conditions, some of which are addressed in the 2006 DEIR/DEIS, to ensure that the project applicant(s) better understand the Central Valley RWQCB's requirements.

The comment is noted. The storm water pollution prevention plan (SWPPP) for the project is subject to all legally required elements.

CVRWQCB-2-2

The comment describes USACE Section 404(b)(1) guidance that must be followed by the project applicant(s) to assure approval of their water quality certification application under Section 401 of the federal Clean Water Act. The proposed Rio del Oro Mitigation Plan included in Appendix C of the 2006 DEIR/DEIS provides compensatory mitigation through on-site preservation and creation of wetlands at a ratio slightly greater than 1:1. The comment notes that the Central Valley RWQCB may require greater mitigation ratios for impacts on waters of the state and suggests that the project applicant(s) consider on-site mitigation alternatives with greater mitigation ratios.

The comment is noted. A revised wetland MMP is included as Appendix Q of this FEIR/FEIS. The project is subject to all legal requirements for water quality certification.

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Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit



February 16, 2007

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

Subject: Rio del Oro Specific Plan
SCH#: 2003122057

Dear Patrick Angell:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on January 22, 2007. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2003122057) when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

RECEIVED BY

FEB 28 2007

PMC

DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE

VENTURE OAKS, MS 15

P. O. BOX 942874

SACRAMENTO, CA 94274-0001

PHONE (916) 274-0638

FAX (916) 274-0648

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February 9, 2007

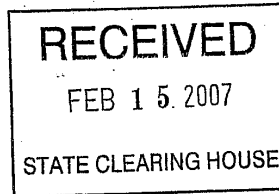
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Rio Del Oro Specific Plan

DEIR

SCH#2003122057



*Clear
1-22-07
latee*

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

Dear Mr. Angell:

Thank you for the opportunity to review and comment on the Rio Del Oro Specific Plan DEIR. Our comments are as follows:

- Mitigation measures 3.14 – 1a-d, i, k, n, q, r, aa, bb, ff and jj all require coordination and cooperation from Caltrans, and depending on the location, the City of Rancho Cordova or Sacramento County. Each of these mitigation measures references participation in the identified projects, meaning fiscal contributions. Caltrans requests to meet with the City and Project proponents to determine the proportional share of funding for the identified mitigations and timing for the implementation of those mitigation projects. Caltrans requests to participate in the development of the financing plan in relation to these mitigation projects.
- When mitigation projects are implemented on State Highway System right-of-way, encroachment permits and other coordination with Caltrans will be necessary.

Caltrans - 1

Caltrans - 2

Please provide our office with a copy of the final EIR and associated documents for this project for our review. If you have any questions regarding these comments, please contact Ken Champion at (916) 274-0615.

Sincerely,

Bruce De Terra, Office Chief
Office of Transportation Planning - South

c: Scott Morgan, State Clearinghouse

Caltrans-1

The comment notes that 2006 DEIR/DEIS transportation Mitigation Measures 3.14-1a through 3.14-1d, 3.14-1k, 3.14-1n, 3.14-1q, 3.14-1r, 3.14-1aa, 3.14-1bb, 3.14-1ff, and 3.14-1jj all require coordination and cooperation with Caltrans and either the City or the County. The comment requests a meeting between Caltrans and the City and the project applicant(s) to determine the proportional share of funding for the identified mitigation measures and timing for implementation of mitigation, and requests that Caltrans participate in the development of the mitigation financing plan.

As described in Chapter 2 of the FEIR/FEIS, the project applicants propose a two-tier entitlement process. The traffic improvement mitigation measures would be adopted as condition of approval of the Tier 1 entitlements, which would include adoption of the Rio del Oro Specific Plan. The actual amount of the project's fair-share contribution and timing of implementation of traffic improvements in the mitigation measures shall be identified as part of the Tier 2 entitlements for the project, which are required before any physical development of the property (see Chapter 2 and the general requirements for Mitigation Measure 3.14-1 in this FEIR/FEIS). Therefore, the actual amount of the fair-share funding and timing of implementation will be determined at that time and Caltrans will be given an opportunity to comment on the plan.

Caltrans-2

The comment states that when mitigation projects are implemented on State Highway System rights-of-way, encroachment permits and other coordination with Caltrans will be necessary.

The comment is noted. See response to comment Caltrans-1.

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SECTION C

Regional and Local Agencies

Based on further review of mitigation measures identified in the Rio del Oro Specific Plan DEIR-EIS, the following modifications are proposed by City Staff to be worked into the Final EIR/EIS:

- Mitigation Measure 3.10-1a would be modified as shown in red italics below in order to allow for circumstances where grading is required to implement wetland mitigation:

3.10-1a: Secure Clean Water Act Section 404 Permit and Implement All Permit Conditions, and Ensure No Net Loss of Wetlands, Other Waters of the United States, and Associated Functions and Values. Before the approval of grading and improvement plans and before any groundbreaking activity associated with each distinct project phase, the project applicant(s) for each project phase requiring the fill of wetlands or other waters of the United States or waters of the state shall obtain all necessary permits under Sections 401 and 404 of the CWA or the State's Porter-Cologne Act for the respective phase. The project applicant(s) shall commit to replace, restore, or enhance on a "no net loss" basis (in accordance with USACE, the Central Valley RWQCB, and the Natural Resources Element of the City General Plan) the acreage of all wetlands and other waters of the United States subject to USACE jurisdiction and waters of the state subject to RWQCB jurisdiction and the City General Plan that would be removed, lost, and/or degraded with implementation of project plans for that phase. Wetland habitat shall be restored, enhanced, and/or replaced at an acreage and location and by methods agreeable to USACE, the Central Valley RWQCB, and the City, as appropriate depending on agency jurisdiction, and as determined during the Section 401 and Section 404 permitting processes.

City-1

To accomplish this mitigation, the project applicant(s) shall take the following steps:

- ▶ As part of the Section 404 permitting process, a draft wetland mitigation and monitoring plan has been developed for the project (Appendix C) by ECORP on behalf of the project applicant(s). Before any ground-disturbing activities that would adversely affect wetlands, and before engaging in mitigation activities associated with each phase of development, the project applicant(s) shall submit the draft wetland mitigation and monitoring plan to USACE, the Central Valley RWQCB, and the City for review and approval of those portions of the plan over which they have jurisdiction. Once the mitigation and monitoring plan is approved and implemented, mitigation monitoring will continue for a minimum of 5 years from completion of mitigation, or human intervention (including recontouring and grading), or until the performance standards identified in the approved mitigation and monitoring plan have been met, whichever is longer.

The plan shall be prepared to the satisfaction of the City, in accordance with the City's Grading and Erosion Control Ordinance, as well as to the satisfaction of those agencies with jurisdiction over all or portions of the plan.

- ▶ In conjunction with preparation and implementation of an approved wetland mitigation and monitoring plan, the project applicant(s) shall prepare and submit plans for the creation of jurisdictional waters of the United States, including wetlands, at an adequate mitigation ratio to offset the aquatic functions and values that would be lost at the project site, account for the temporal loss of habitat, and contain an adequate margin of safety to reflect anticipated success. The mitigation and monitoring plans must demonstrate how the aquatic functions and values that would be lost through project implementation will be replaced. The habitat mitigation and monitoring plan for jurisdictional wetland features will need to be consistent with USACE's December 30, 2004, *Habitat Mitigation and Monitoring Proposal Guidelines*. The wetland mitigation and monitoring plan shall also mitigate impacts on vernal pool and seasonal wetland habitat, and shall describe specific method(s) to be implemented to avoid and/or mitigate any off-site project-related impacts. The wetland creation section of the habitat mitigation and monitoring plan shall include the following:

- target areas for creation;
- a complete biological assessment of the existing resources in the target areas;
- specific creation and restoration plans for each target area;
- performance standards for success that will illustrate that the compensation ratios are met; and
- a monitoring plan, including schedule and annual-report format.

► For each phase of development, including off-site project-related impacts, the project applicant(s) shall secure the permits and regulatory approvals described below and shall implement all permit conditions. For each respective phase, all permits, regulatory approvals, and permit conditions for effects on wetland habitats shall be secured before implementation of any grading activities within 250 feet of waters of the United States or wetland habitats, including waters of the state, that potentially support federally listed species. The setback may be reduced to a distance approved by the City and USFWS if a wetland avoidance plan is developed and implemented by a qualified biologist. The wetland avoidance plan must be approved by USFWS and the City and shall demonstrate that all direct and indirect impacts on wetlands will be avoided. Project phases in upland areas with no wetlands or waters of the United States within 250 feet, and no overland hydrologic flow patterns, the disturbance of which may affect such waters, may begin construction before these particular permits are obtained. Buffers around wetlands that do not support federally listed species shall be a minimum of 50 feet from the edge of these features in accordance with conditions of the NPDES permit and associated best management practices (BMPs).

- Authorization to place dredged or fill material into waters of the United States shall be secured from USACE through the CWA Section 404 permitting process before any fill is placed in jurisdictional wetlands or other waters of the United States. USACE has determined that the project will require an individual permit. In its final stage and once approved by USACE, the proposed mitigation and monitoring plan for the project is expected to detail proposed wetland restoration, enhancement, and/or replacement activities that would ensure no net loss of aquatic functions and values in the project vicinity. Approval and implementation of the wetland mitigation and monitoring plan shall fully mitigate all impacts on jurisdictional waters of the United States, including jurisdictional wetlands. In addition to USACE approval, approval by the City and the Central Valley RWQCB, as appropriate depending on agency jurisdiction, and as determined during the Section 401 and Section 404 permitting processes, will also be required. To satisfy the requirements of the City and the Central Valley RWQCB, mitigation of impacts on nonjurisdictional wetlands beyond the jurisdiction of USACE shall be included in the same mitigation and monitoring plan. *All mitigation requirements determined through this process shall be implemented before grading plans are approved. ITALIC TEXT TO BE DELETED* Wetland mitigation must be approved before any impacts on wetlands commence.
- Water quality certification pursuant to Section 401 of the CWA will be required before issuance of a Section 404 permit. Before construction in any areas containing wetland features, the project applicant(s) shall obtain water quality certification for the applicable phase of the project. Any measures required as part of the issuance of water quality certification shall be implemented.

If Section 401 and 404 permit requirements ensure no net loss of all wetland features, including vernal pools, and these requirements are addressed before any ground-disturbing activities, no additional mitigation will be required by the City. Written approval from the City indicating that these requirements fulfill all no-net-loss obligations must be obtained before the approval of grading or improvement plans or any ground-disturbing activities in any project phase containing wetland features.

Timing: Before the approval of grading or improvement plans or any ground-disturbing activities for any project development phase containing wetland features. The mitigation and monitoring plan must be approved before any impact on wetlands can occur. Mitigation shall be implemented on an ongoing basis throughout and after construction, as required.

Enforcement: U.S. Army Corps of Engineers, Sacramento District; Central Valley Regional Water Quality Control Board; and City of Rancho Cordova Planning Department, as appropriate depending on agency jurisdiction, and as determined during the Section 401 and Section 404 permitting processes and in compliance with the City's Grading and Erosion Control Ordinance.

- Mitigation Measure 3.13-2a would be modified as shown in red italics below in order to clarify that it does not apply to Phase 1 and that the provisions of this mitigation measure allow for other regulatory processes that clear subsequent phases:

3.13-2a: Require the Project Applicant(s) to Cooperate with Aerojet and Regulatory Agencies to Preserve, Modify, or Close Existing Groundwater Monitoring Wells. The project applicant(s) for all project phases *(with the exception of Phase 1 which has been cleared for development)* shall submit copies of tentative maps for residential subdivisions and for nonresidential uses to Aerojet, DTSC, and the Central Valley RWQCB or any successor in interest for review and approval. Aerojet, DTSC, and the Central Valley RWQCB or any successor shall work with the project applicant(s) to establish the preservation, modification, or closure of existing groundwater wells. If necessary, Aerojet, MDC, or any successor may purchase lots from the project applicant(s) to maintain access to monitoring wells. Development shall not proceed until DTSC and the Central Valley RWQCB have approved Aerojet's or a successor's plan for well preservation, modification, or closure. *The requirements of this mitigation may be superceded by actions by the regulatory agencies that clears subsequent phases of the site for development. Documentation of such actions shall be provided to the City as part of tentative subdivision map applications.*

City-2
Cont.

Timing: Before approval of tentative maps for all project phases *beyond Phase 1.*

Enforcement: California Department of Toxic Substances Control, Central Valley Regional Water Quality Control Board, Aerojet General Corporation, and City of Rancho Cordova Planning Department.

- Mitigation Measure 3.14-3a is associated with transit. This mitigation measure is expected to be modified to require participation in the Citywide Transit-Related Services Special Tax Area. The following is proposed language from Public Works:

Revised MM 3.14-3a: Participate in Capital Improvements for Transit Service. The project applicant(s) for all project phases shall participate in providing transit-related services through annexation to the City's Transit-Related Services Special Tax Area and payment of the tax. Capital improvements for transit services will be part of the City's Transportation CIP and will include the construction and operation of the streetcar system, purchase of a shuttle fleet and construction of a maintenance facility. The project's fair-share participation for those facilities will be satisfied through payment of the transportation fee. Capital improvement costs for on-site ancillary facilities are not in the City Transportation CIP. In order to fulfill the need for on-site facilities, the developer shall provide on-site transfer and connection facilities at appropriate locations as part of site development plans. Transfer facilities shall be provided at major arterial intersection. All transfer, fair collection and information facilities shall be provided at land uses that are major transit transfer points or destinations. These sites include major commercial and recreational land uses.

City-3

- Mitigation Measure 3.14-6 involves the fair-share payment of costs that are not currently included in the City's Fee Program. The City is currently working having the fee program updated. Planning and Public Works staff will continue to work on this issue. No specific changes to this mitigation language have been developed yet.

City-4

- Mitigation Measure 3.15-1 includes the application of the SMAQMD off-site construction mitigation fund. While the City generally supports efforts of SMAQMD, we expect to have further discussions with the SMAQMD regarding the application of this measure on projects of Rio's size as well as in relation to recent comments we have received from SMAQMD on the DEIR-EIS. We will be setting up meetings with the District and EDAW on this issue.

City-5

City-1

The City proposes to revise Mitigation Measure 3.10-1a of the 2006 DEIR/DEIS, “Secure Clean Water Act Section 404 Permit and Implement All Permit Conditions, and Ensure No Net Loss of Wetlands, Other Waters of the United States, and Associated Functions ,” to allow for circumstances where grading is required to implement wetland mitigation.

As shown in Chapter 5 of this FEIR/FEIS, the following text included in Mitigation Measure 3.10-1a on page 3.10-30 of the 2008 RDEIR/SDEIS is hereby revised to read as follows:

- ▶ Authorization to place dredged or fill material into waters of the United States shall be secured from USACE through the CWA Section 404 permitting process before any fill is placed in jurisdictional wetlands or other waters of the United States. USACE has determined that the project will require an individual permit. In its final stage and once approved by USACE, the proposed mitigation and monitoring plan for the project is expected to detail proposed wetland restoration, enhancement, and/or replacement activities that would ensure no net loss of aquatic functions -in the project vicinity. Approval and implementation of the wetland mitigation and monitoring plan shall fully mitigate all impacts on jurisdictional waters of the United States, including jurisdictional wetlands. In addition to USACE approval, approval by the City and the Central Valley RWQCB, as appropriate depending on agency jurisdiction, and as determined during the Section 401 and Section 404 permitting processes, will also be required. To satisfy the requirements of the City and the Central Valley RWQCB, mitigation of impacts on nonjurisdictional wetlands and waters of the state beyond the jurisdiction of USACE shall be included in the same mitigation and monitoring plan. ~~All mitigation requirements determined through this process shall be implemented before grading plans are approved.~~ Wetland mitigation must be approved before any impacts on wetlands-waters of the United States or waters of the state commence.

City-2

The City proposes to revise Mitigation Measure 3.13-2a of the 2006 DEIR/DEIS, “Require the Project Applicant(s) to Cooperate with Aerojet and Regulatory Agencies to Preserve, Modify, or Close Existing Groundwater Monitoring Wells,” to clarify that it does not apply to Phase 1 and that the provisions of this mitigation measure allow for other regulatory processes that clear subsequent phases.

As shown in Chapter 5 of this FEIR/FEIS, Mitigation Measure 3.13-2a on pages 3.13-20 and 3.13-21 of the 2006 DEIR/DEIS is hereby revised to read as follows:

Mitigation Measure 3.13-2a: Require the Project Applicant(s) to Cooperate with Aerojet and Regulatory Agencies to Preserve, Modify, or Close Existing Groundwater Monitoring Wells.

~~The project applicant(s) for all project phases shall submit copies of tentative maps for residential subdivisions and for nonresidential uses to work with Aerojet, DTSC, and the Central Valley RWQCB or any successor in interest for review and approval. Aerojet, DTSC, and the Central Valley RWQCB or any~~

~~successor shall work with the project applicant(s) to establish the preservation, modification, or closure of existing groundwater monitoring wells. If necessary, Aerojet, MDC, or any successor may purchase lots from the project applicant(s) to maintain access to monitoring wells. Development shall not proceed until DTSC and the Central Valley RWQCB have approved Aerojet's or a successor's plan for well preservation, modification, or closure. If groundwater wells are to be affected by proposed tentative maps, then the project applicant(s) or successors shall provide City with evidence that the relocation, modification, or closure of the well(s) is approved by the appropriate agencies as part of the City's final map approval process and before development.~~

Timing: Before approval of small-lot tentative maps for any portion of the project site except the Phase 1 area as shown in Exhibit 3.13-1.

City-3

The City Public Works Department proposes to revise Mitigation Measure 3.14-3a of the 2006 DEIR/DEIS, "Participate in Capital Improvements for Transit Service," to require participation in the Citywide Transit-Related Services Special Tax Area.

As shown in Chapter 5 of this FEIR/FEIS, Mitigation Measure 3.14-3a on page 3.14-76 of the 2006 DEIR/DEIS is hereby revised to read as follows:

Mitigation Measure 3.14-3a: Participate in Capital Improvements for Transit Service. ~~The project applicant(s) for all project phases shall participate in capital improvements for transit service. In providing transit-related services through annexation to the City's Transit-Related Services Special Tax Area and payment of the tax. Capital improvements for transit services will be part of the City's Transportation CIP and will include the construction and operation of the streetcar system, purchase of a shuttle fleet, and construction of a maintenance facility. The project's fair-share participation and the associated timing of the improvements shall be identified in the project conditions of approval and/or the project's development agreement. Improvements shall be coordinated, as necessary, with Sacramento RT. will be satisfied through payment of the transportation fee. Capital improvement costs for on-site ancillary facilities are not in the City Transportation CIP. In order to fulfill the need for on-site facilities, the project applicant(s) shall provide on-site transfer and connection facilities at appropriate locations as part of site development plans. Transfer facilities shall be provided at major arterial intersections. All transfer, fare collection, and information facilities shall be provided at land uses that are major transit transfer points or destinations. These sites include major commercial and recreational land uses.~~

City-4

The comment states that the City is currently working on an update to its fee program, and that therefore, no specific changes to Mitigation Measure 3.14-6 of the 2006 DEIR/DEIS, "Pay Fair-Share Cost of Identified Improvements that Are Not Fully Funded by the City's Fee Program," have yet been developed.

As required by Mitigation Measure 3.14-6 of the 2006 DEIR/DEIS, the project applicant(s) would be responsible for paying its fair share of transportation improvements as the project builds out. The City has stated that the project applicant(s) will need to prepare a fair-share analysis for affected transportation facilities that are not included in the City's current Development Impact Fee Program. No changes to the text of the mitigation measure contained in the 2006 DEIR/DEIS are required. However, as shown

in Chapter 5 of this FEIR/FEIS, the timing of Mitigation Measure 3.14-6 on page 3.14-78 of the 2006 DEIR/DEIS is hereby revised as follows:

Timing: As a condition of project approval and/or as a condition of the development agreement for all project phases As part of Tier 2 entitlements and before any physical development of the property (excluding on-site wetland fill and mitigation activities).

City-5

The comment states that while the City generally supports the efforts of SMAQMD, it expects to set up meetings with SMAQMD and [AECOM, formerly] EDAW regarding the application of Mitigation Measure 3.15-1 of the 2006 DEIR/DEIS, “Implement Measures to Control Construction-Related Air Pollutant Emissions,” on projects of the size of Rio del Oro and in relation to comments received from SMAQMD on the 2006 DEIR/DEIS.

The comment is noted. See responses to comments SMAQMD-1 through SMAQMD-6, below.

PROJECT NAME: DRAFT EIR/EIS, SPECIFIC AND PUBLIC FACILITIES FINANCING PLANS FOR RIO DEL ORO (DATED DEC. 2006)

Control Number

State Clearinghouse Number: 2003122057

Reviewer Names: Helen Lu (HLu), Jose Ramirez (JRR)

Consultant Team:

Comments Description: Review Comments Related to Recycled Water

Senior Civil Engineer: Jose Ramirez

No.	Page No. and or Section No.	COMMENTS	REVIEWER INITIALS	RESPONSE	CONSULTANT INITIALS
DRAFT EIR/EIS REPORT					
1	Exhibit 2-9a	Include a conceptual layout for an on-site "non-potable/recycled water system".	JRR		
2	Pg. 2-33, Fourth paragraph from top	Revise the second and third sentences as follows: "The Sacramento Regional County Sanitation District (SRCSD) is currently in the process of developing a Water Recycling Master Plan (WRMP) Opportunities Study (WROS). The WRMP WROS will examine opportunities..."	JRR		
3	Pg. 2-33, Sixth paragraph from top	Revise the first sentences as follows: "Initial analysis for the WRMP WROS indicates that..."	JRR		
PUBLIC REVIEW FOR DRAFT RIO DEL ORO SPECIFIC PLAN					
4	Pg. 6-8, First paragraph	Revise the last two sentences of the first paragraph as follows: "SRSCD is currently in the process of developing a Water Recycling Master Plan (WRMP) Opportunities Study (WROS). The WRMP WROS will examine..."	JRR		
5	Exhibit 6-4	Include a conceptual layout for an on-site "non-potable/recycled water system".	JRR		
PUBLIC REVIEW FOR DRAFT RIO DEL ORO PUBLIC FACILITIES FINANCING PLAN					
6	Tables 3, 4, 5, 7, 11, 12, 13, 14, 15, and 16	Include a rough cost estimate for an on-site "non-potable/reclaimed water" system.	JRR		
7	Pg. 49, Add bullet item?	Please verify if the RDOSP can participate in an SCWA/SRCSD Non-Potable/Reclaimed Water Program.	JRR		
8	Pg. 49, Add bullet item?	Please verify if we can add a bullet item for a "Non-Potable/Reclaimed Water" System.	JRR		
9	Table 17, Pg. 69	Can we add a "Non-Potable/Reclaimed Water Component" to Table 17?	JRR		
10	Map A-2, Appendix A	Include a conceptual layout for an on-site "non-potable/recycled water system".	JRR		

SRCSD1-1

SRCSD1-2

SRCSD1-3

SRCSD1-4

SRCSD1-5

SRCSD1-6

SRCSD1-7

SRCSD1-8

SRCSD1-9

SRCSD1-10

- SRCSD1-1 *The comment asks that Chapter 2 of the 2006 DEIR/DEIS include a conceptual layout for an on-site “non-potable/recycled water system.”*
- As shown on page 3.5-86 of the 2008 RDEIR/SDEIS, Exhibit 3.5-2 shows a conceptual layout for an on-site nonpotable/recycled water system.
- SRCSD1-2 *The comment asks that the second and third sentences of the fourth paragraph of 2006 DEIR/DEIS page 2-33 be revised to change the name of SRCSD’s water recycling study to “Water Recycling Opportunities Study.”*
- The change requested by the commenter was made in the 2008 RDEIR/SDEIS (page 3.5-25).
- SRCSD1-3 *The comment asks that the first sentence in the sixth paragraph of 2006 DEIR/DEIS page 2-33 be revised to change the abbreviation for SRCSD’s water recycling study to “WROS.”*
- The text referred to by the commenter was deleted in the 2008 RDEIR/SDEIS.
- SRCSD1-4 *The comment asks that the last two sentences of the first paragraph of page 6-8 of the Rio del Oro Specific Plan be revised to change the name of SRCSD’s water recycling study to “Water Recycling Opportunities Study.”*
- The requested change to the text of the specific plan has been made.
- SRCSD1-5 *The comment asks that Chapter 6 of the draft Rio del Oro Specific Plan include a conceptual layout for an on-site “non-potable/recycled water system.”*
- A new exhibit has been created for the Rio del Oro Specific Plan (Exhibit 6-5a) that shows a conceptual layout for an on-site “nonpotable/recycled water system.”
- SRCSD1-6 *The comment asks that the draft Rio del Oro Public Facilities Financing Plan include a rough cost estimate for an on-site “non-potable/reclaimed water” system.*
- Since the release of the 2006 DEIR/DEIS, the project applicant(s) have provided further specifications on the potential for using recycled water on-site, as identified in their *Non-Potable Water Study for Rio del Oro Specific Plan* (February 2007). These specifications include preliminary cost estimates (see Appendix E of the *Non-Potable Water Study for Rio del Oro Specific Plan*).
- SRCSD1-7 *The comment asks for verification whether the Rio del Oro Specific Plan can participate in an SCWA/SRCSD Non-Potable/Reclaimed Water Program.*
- See response to comment SRCSD1-6 above regarding the potential of using recycled water on-site.

SRCSD1-8 *The comment asks whether a bullet item for a “Non-Potable/Reclaimed Water” System can be added on page 49 of the draft Rio del Oro Public Facilities Financing Plan.*

The requested bullet will be added to the Public Facilities Financing Plan at the time specific development entitlements are sought. (See Chapter 2, “Minor Modifications to the Proposed Project,” of this FEIR/FEIS.)

SRCSD1-9 *The comment asks whether a “Non-Potable/Reclaimed Water Component” can be added to Table 17 of the draft Rio del Oro Public Facilities Financing Plan.*

The requested item will be added to Table 17 of the Public Facilities Financing Plan at the time specific development entitlements are sought. (See Chapter 2, “Minor Modifications to the Proposed Project,” of this FEIR/FEIS.)

SRCSD1-10 *The comment asks that Appendix A of the draft Rio del Oro Public Facilities Financing Plan include a conceptual layout for an on-site “non-potable/recycled water system.”*

A new exhibit will be created in the Rio del Oro Public Facilities Financing Plan (Map A-9 to Appendix A) to show a conceptual layout for an on-site “nonpotable/recycled water system” at the time specific development entitlements are sought. (See Chapter 2, “Minor Modifications to the Proposed Project,” of this FEIR/FEIS.)

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From: Lockhart, Don [Donald.Lockhart@SacLAFCo.org]
Sent: Thursday, December 14, 2006 2:16 PM
To: Patrick Angell
Subject: RE: Rio del Oro SP

Kindly note that any such action will be subject to LAFCo proceedings, after the local land use entitlement process is completed. If either or both Districts Spheres of Influence need to be amended, that also should be discussed. Thank you for the information.

LAFCo - 1

Don Lockhart, AICP
Assistant Executive Officer
Sacramento LAFCo
1112 I Street, Suite 100
Sacramento, CA 95814-2836
916.874.2937
916.874.2939 (FAX)
Donald.Lockhart@SacLAFCo.org

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From: Patrick Angell [mailto:PAngell@pacificmunicipal.com]
Sent: Thursday, December 14, 2006 9:47 AM
To: Lockhart, Don
Subject: RE: Rio del Oro SP

Sorry it has taken me a while to get back to you. A portion of the Specific Plan area will need to be annexed to SRCSD and CSD-1.

From: Don Lockhart [mailto:Donald.Lockhart@SacLAFCo.org]
Sent: Friday, December 01, 2006 4:16 PM
To: Patrick Angell
Subject: Rio del Oro SP

Hi Pat, just received a CD for the EIR/EIS. Kindly advise, does the SP envision any boundary changes, or service extensions outside of city limits? Thanks, Don

Don Lockhart, AICP
Assistant Executive Officer
Sacramento LAFCo
1112 I Street, Suite 100
Sacramento, CA 95814-2836
916.874.2937
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LAFCo-1

The comment states that annexation of a portion of the Rio del Oro Specific Plan area into the service areas of SRCSD and County Sanitation District No. 1 (CSD-1) would be subject to proceedings by the Sacramento County Local Agency Formation Commission (LAFCo) after the local land use entitlement process is completed. The comment also states that the Sacramento LAFCo will need to be involved if the sphere of influence of either SRCSD or CSD-1 would need to be amended.

As stated by the commenter, annexation of the Rio del Oro project site into the service areas of SRCSD and CSD-1 (which is now known as the Sacramento Area Sewer District) must be approved by the Sacramento LAFCo before these districts could provide wastewater service to the project. The policies and guidelines for annexation approval by the Sacramento LAFCo are provided on page 3.1-14 of 2006 DEIR/DEIS Section 3.1, "Land Use." Consistency with Sacramento LAFCo guidelines for annexation of the project site to SRCSD and CSD-1 (Sacramento Area Sewer District) are discussed under Impacts 3.1-1 and 3.1-4. As described in Impact 3.1-1 on 2006 DEIR/DEIS page 3.1-23, the Sacramento LAFCo would need to conduct proceedings to consider an amendment to the sphere of influence.

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Municipal Services Agency

Department of Transportation

Tom Zlotkowski, Director



Terry Schutten, County Executive
Cheryl Creson, Agency Administrator

County of Sacramento

December 15, 2006

RECEIVED BY

DEC 26 2006

PMC

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

Anna Sutton
U. S. Army Corps of Engineers, Sacramento District
Regulatory Branch
1325 J Street, Room 1480
Sacramento, CA 95814-2922

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE RIO DEL ORO
SPECIFIC PLAN PROJECT**

Dear Mr. Angell and Ms. Sutton:

The County of Sacramento, Department of Transportation has reviewed the Draft Environmental Impact Report (DEIR) for the Rio Del Oro Specific Plan. We appreciate the opportunity to review this document and have the following general comments:

- Tom Zlotkowski, Department of Transportation Director, County of Sacramento, is currently working with a multi-jurisdictional coalition that is analyzing regional transportation issues in the East Sacramento/West El Dorado County region. The City of Rancho Cordova is also involved with this effort. This analysis attempts to establish land use and infrastructure baseline and cumulative condition assumptions that should be used on future studies in the region. This project should be subject to the assumptions recently identified by this coalition.
- It should be pointed out that the County of Sacramento would expect that the traffic impacts caused by this particular Specific Plan be mitigated by the development to the extent that the development is responsible for the impacts. To that end, the financing for these improvements should be identified in a public facilities financing plan.

If you have any questions, please feel free to contact me at 874-7052.

Sincerely,

Matthew G. Darrow
Senior Civil Engineer

MGD:mgd

c: Steve Hong, IFS
Dean Blank, DOT
Dan Shoeman, DOT
Tom Zlotkowski, DOT



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Operations & Maintenance: 4100 Traffic Way, Sacramento, CA 95827 . Phone: 916-875-5123 . Fax: 916-875-5363
www.sacdot.com

DOT - 1

DOT - 2

DOT-1

The comment states that the Rio del Oro Specific Plan should be subject to the assumptions recently identified by the multijurisdictional coalition established by the director of the County Department of Transportation regarding regional transportation issues in the east Sacramento/west El Dorado County region.

The transportation assessment in the 2006 DEIR/DEIS acknowledges the coalition referred to by the commenter—the 50 Corridor Mobility Coalition—and its integral role in developing infrastructure improvements to the region. The specific plan is consistent with the findings of the coalition, and it accounts for regional mobility improvements throughout the specific plan area.

DOT-2

The comment states that the County expects the traffic impacts of the Rio del Oro Specific Plan to be mitigated by the development to the extent that the development is responsible for the impacts, and that the financing for these improvements should be identified in a public facilities financing plan.

The comment is noted. Improvements will be identified in the Rio del Oro project's conditions of approval and/or financing plan as part of subsequent entitlements (see Chapter 2, "Minor Modifications to the Proposed Project," of this FEIR/FEIS for a further discussion of Tier 2 entitlements). The required mitigation measures and their conditions will also be provided in the City's Mitigation Monitoring and Reporting Program.

Municipal Services Agency

Department of Water Resources

Keith DeVore, Director



County of Sacramento

Terry Schutten, County Executive
Cheryl Creson, Agency Administrator

January 26, 2007

Economic & Planning Systems
Tim Youmans
2150 River Plaza Drive, Ste 400
Sacramento, CA 95833
Fax: (916)649-2070

Copy: riodeloro@cityofranchocordova.org

Copy: Tim Crush, Wood Rodgers

SUBJECT: Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan

http://www.cityofranchocordova.org/city_departments/planning_rio_del_oro.html

Dear Tim:

I have reviewed the drainage section of the subject IPFFP and have a few comments.

- | | |
|--|----------|
| 1. This report is for information only and can not take precedence over the Sacramento County Water Agency Code. | SCDWR1-1 |
| 2. Teichert (and Granite) operate the mining pit, known as Aspen VI, adjacent to Morrison Creek downstream of Rio del Oro. The miners are suggesting that upstream developers should pay some, yet to be quantified, amount for the use of their land as the proposed ultimate condition detention basin that will serve to attenuate peak flows in the creek. | SCDWR1-2 |
| 3. The trunk drainage quantities have not been reviewed. Revise unit prices for pipes to accurately reflect the 2006 Zone 11 Credit Schedule (for example, the report lists 30" SD pipe at \$60 versus \$55.46 in the credit schedule, rounding error is similar throughout). | SCDWR1-3 |
| 4. Please assure that off-site drainage improvements are included, such as work immediately upstream of the inverted siphon under the Folsom South Canal | SCDWR1-4 |

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Main: 827 7th St., Rm. 301, Sacramento, CA 95814 • (916) 874-6851 • fax (916) 874-8693 • www.saccounty.net
(search: DWR)
Drainage Operations & Maint.: 3847 Branch Center Rd. #4, Sacramento, CA 95827 • (916) 875-RAIN • fax (916) 875-7160

(basin improvements, box culvert under Sunrise, and floodwalls), per Wood-Rodgers' study.	SCDWR1-4 Cont.
5. Detention basin credit per acre should state "land" and the value will be based on the lowest of the appraised value dated the earliest date of a map application for any map that is conditioned to construct the basin, or the amount shown in the Zone 11 fee plan (\$100,000 plus ENR inflator since 2004, approx \$110,000 in 1996 \$\$). This might mean that the \$130,000 per acre shown is too high.	SCDWR1-5
6. Detention basin excavation has not been included, specifically, in the report. This should be shown as a separate line item at the credit schedule unit price per cubic yard.	SCDWR1-6
7. Channel excavation is credited per cubic yard and should be shown that way.	SCDWR1-7
8. Channel and basins will be hydro-seeded and the area unit price should be shown.	SCDWR1-8
9. Mitigation measures, such as landscaping and associated irrigation, is not credited by Zone 11A	SCDWR1-9
10. Engineering is credited at 8% of the construction credits, excluding land costs.	SCDWR1-10
NOTE: Please find Zone 11 fee/credit schedule on line at www.saccodwr.org search: 2006 reports and publications zone 11 fee	
Consequently, the total credit amount shown on sheet 6 of Table B-1 as \$28,906,673 is incorrect. Page 25 indicates that the total Storm Drainage cost is \$38,505,173, a difference of \$9.6 million. Stormwater pump stations the entire difference in the cost versus the credits, shown at an estimated cost of \$9.6 million.	SCDWR1-11
Stormwater pump stations are for the benefit of the developer because they allow for a smaller detention basin footprint and thereby allow for additional developable land. Pump stations are excluded from Zone 11A credits pursuant to Section 2.55.04 (C) of the Sacramento County Water Agency Code, Title 2.	
The drainage corridor should be designed in such a way as to be aesthetically pleasing amenities to the community while incorporating flood control, drainage, storm water quality, trails, park features, and all requirements of the federal and state regulators.	SCDWR1-12

Detention basins shall not only be designed to be an aesthetic amenity, but must limit mosquito gestation.	SCDWR1-12 Cont.
Landscaping, operations and maintenance within the channels, basins, and preserve areas shall be by a third party and financed in perpetuity by a mechanism other than the Storm Water Utility. Furthermore, the Clean Water Act, Section 404 permit will likely require a preserve management program.	SCDWR1-13
The finance plan should include analysis of the long term operation and maintenance cost of the stormwater pump stations and a mechanism for assuring that these costs are funded.	SCDWR1-14

Sincerely,

George H. Booth
Senior Civil Engineer
(916)874-6484
Email: boothg@saccounty.net

CC. Mark Rains, Pete Hall – Water Resources

- SCDWR1-1 *The comment states that the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan is for information only and cannot take precedence over the SCWA Code.*
- The comment is noted.
- SCDWR1-2 *The comment states that Teichert (and Granite) operate the mining pit known as Aspen VI adjacent to Morrison Creek downstream of the Rio del Oro project site. The comment notes that the miners are suggesting that upstream developers should pay some yet-to-be-quantified amount for the use of their land as the proposed detention basin that will serve to attenuate peak flows in Morrison Creek.*
- Since the date this comment was made, negotiations between the Sacramento County Department of Water Resources (SCDWR) and the mining companies (Teichert and Granite) have progressed. There is currently no plan for or discussion about having upstream developers pay for the proposed detention basin that would serve to attenuate peak flows in Morrison Creek. SCDWR and the mining companies have been working with a consultant (Wood Rodgers) to identify the existing condition with regard to detention/flooding within the mining reach of Morrison Creek. The Rio del Oro Drainage Master Plan is designed to attenuate flows to predevelopment levels so that the project would not increase the existing detention/flooding within the mining reach.
- SCDWR1-3 *The comment states that the trunk drainage quantities have not been reviewed and that unit prices for pipes should be revised in the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan to accurately reflect the 2006 Zone 11 Credit Schedule.*
- The Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan (PFFP) will be updated in the future to be consistent with the latest version of the Zone 11 Credit Schedule, which is updated annually. The existing PFFP costs can be adjusted using the annual increases. The schedule increased by 5.28% in 2007 and by 1.43% in 2008.
- SCDWR1-4 *The comment asks that off-site drainage improvements, such as work immediately upstream of the inverted siphon under the Folsom South Canal, be included in the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan.*
- As requested by the commenter, the off-site drainage improvements may be included in the update of the PFFP, which will be included as part of the Tier 2 entitlements for the project. Those entitlements must be approved before any physical development of the property may occur (see the discussion of the project entitlement process in Chapter 2, "Minor Modifications to the Proposed Project," of this FEIR/FEIS).
- SCDWR1-5 *The comment says that detention basin credit per acre, as shown in the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan, should state "land," and that the value will be based on the lowest of (1) the appraised value dated the earliest date of a map application for any map that is conditioned to construct the basin, or (2) the amount shown in the Zone 11 fee plan. The comment states that, as a result, the \$130,000 per acre credit shown in the plan might be too high.*
- The PFFP will be updated to include the land value and the credit per acre will be updated. The PFFP will be included as part of the Tier 2 entitlements for the project,

which must be approved before any physical development of the property may occur (see the discussion of the project entitlement process in Chapter 2, “Minor Modifications to the Proposed Project,” of this FEIR/FEIS).

SCDWR1-6

The comment states that detention basin construction should be added to the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan as a separate line item, at the credit schedule unit price per cubic yard.

The PFFP will be updated to include the detention basin construction at the credit schedule unit price per cubic yard. The PFFP will be included as part of the Tier 2 entitlements for the project, which must be approved before any physical development of the property may occur (see the discussion of the project entitlement process in Chapter 2, “Minor Modifications to the Proposed Project,” of this FEIR/FEIS).

SCDWR1-7

The comment states that channel excavation should be credited per cubic yard in the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan.

The PFFP will be updated to include the channel excavation construction at the credit schedule unit price per cubic yard. The PFFP will be included as part of the Tier 2 entitlements for the project, which must be approved before any physical development of the property may occur (see the discussion of the project entitlement process in Chapter 2, “Minor Modifications to the Proposed Project,” of this FEIR/FEIS).

SCDWR1-8

The comment states that the area unit price for hydroseeding channel and basins should be shown in the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan.

The PFFP will be updated to include the unit price for hydroseeding channel and basins. The PFFP will be included as part of the Tier 2 entitlements for the project, which must be approved before any physical development of the property may occur (see the discussion of the project entitlement process in Chapter 2, “Minor Modifications to the Proposed Project,” of this FEIR/FEIS).

SCDWR1-9

The comment states that mitigation measures, such as landscaping and associated irrigation, are not credited by Zone 11A as indicated in the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan.

The PFFP will be updated to identify items credited by Zone 11A. The PFFP will be included as part of the Tier 2 entitlements for the project, which must be approved before any physical development of the property may occur (see the discussion of the project entitlement process in Chapter 2, “Minor Modifications to the Proposed Project,” of this FEIR/FEIS).

SCDWR1-10

The comment states that engineering should be credited at 8% of the construction credits, excluding land costs, rather than 20% as shown in the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan.

The plan includes a 20% engineering credit based on estimated engineering/design and other soft costs. The PFFP is using 20% for all engineering items and will be updated to identify that Zone 11A credits 8% for engineering and that engineering cost above the 8% may be subject to reimbursement from other funding sources (e.g., supplemental drainage fees, community facilities district [CFD]/Mello-Roos bonds).

SCDWR1-11

The comment states that the total credit amount for drainage shown in the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan is incorrect.

Each of the costs discussed is eligible for credits. The drainage costs were determined per acre and an estimate of total costs was made to determine the order of magnitude of potential credits, based on Zone 11A fees current as of 2006. The credits listed, moreover, are at or below the amount of current credits. The actual credit amount will not be determined until approval of the final improvement plan, and the PFFP will be updated as identified above to be consistent with Zone 11A credits.

SCDWR1-12

The comment states that the drainage corridor should be designed to be aesthetically pleasing to the community while incorporating flood control, drainage, stormwater quality, trail, and park features, and meeting all federal and state regulatory requirements. The comment further states that detention basins must limit mosquito gestation as well as being designed as an aesthetic amenity.

The Rio del Oro project includes 187 acres of drainage corridors and open space. The corridors would range from 200 to 300 feet wide and would consist of a meandering low-flow channel, adjacent wetlands, riparian plantings, and a bike trail. Moreover, these drainage corridors include water quality treatment swales and basins, for which no compensatory credit is sought. These swales and basins would provide a cleansing and polishing function, treating stormwater and nuisance flows before their release into the proposed low-flow channels and adjacent wetland habitat that would be created. Increased flows caused by an increase in impervious surfaces would be directed to these drainage corridors and are not connected to the vernal pool habitat that would be permanently preserved within the 507-acre vernal pool preserve. The drainage corridors would also be managed as required by an agency-approved O&M plan, which would include measures to manage invasive nonnative species. Three detention basins (7, 6, and 26 acres in size) would be constructed as part of the project for flood protection.

With respect to mosquito gestation, the City requires the design and construction of water retention structures, drainage ditches, swales, and mitigated wetlands to incorporate wetland mosquito management guidelines to reduce the potential for transmission of mosquito-borne disease. The project would incorporate Mitigation Measure 3.13-6, which requires the project applicant(s) to develop a set of site-specific wetland mosquito management guidelines, to receive approval of the guidelines from the City, and to implement such guidelines before the start of construction of each project phase.

SCDWR1-13

The comment states that a third party shall provide landscaping, operations, and maintenance within the channels, basins, and preserve areas and a mechanism other than the stormwater utility shall provide financing in perpetuity. The comment also states that the CWA Section 404 permit will likely require a preserve management program.

The commenter's recommendation, stating that a third party should provide the landscaping and O&M for the preserve areas, channels, and basins, is noted. A detailed O&M plan would be developed for the vernal pool preserve, the drainage corridors, and the elderberry preserve. These plans would identify, among other things, the habitat manager, the manager's responsibilities, and the long-term funding mechanism. These plans would be submitted for SCDWR agency review and approval.

With respect to financing, the project applicant(s) would be required to establish an endowment or some other financial mechanism that would be sufficient to fund management of the preserves and corridors in perpetuity, as stated on page 3.10-35 of the 2008 RDEIR/SDEIS. The particular method of funding would be negotiated by the permitting agencies and the project applicant(s) during the permit approval process, which would not conclude until after completion of the CEQA and NEPA processes.

The comment asks that the Rio del Oro Specific Plan Infrastructure and Public Facilities Financing Plan analyze the long-term O&M costs of the stormwater pump stations and include a mechanism for assuring that these costs are funded.

As noted in Chapter 7 of the PFFP, “[a] separate analysis of ongoing operations and maintenance funding will be prepared and will provide a detailed discussion of the costs and potential funding sources for operations and maintenance of RDOSP facilities, as well as, public services (e.g., parks programming).” This separate analysis has not yet been prepared, but should cover the O&M costs of the stormwater pump stations.

SCWA Zone 11A maintains several pump stations. As noted in the second paragraph of Chapter 7 of the PFFP, however, “if a funding shortfall is deemed to exist, a Mello Roos CFD, Community Services District (CSD), Lighting and Landscaping District (LLD), or some other funding mechanism will be established.” Thus, if Zone 11A were unable to fund the O&M of pump stations, a supplemental drainage maintenance fee would be established.

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January 29, 2007

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

SUBJECT: **Rio Del Oro Specific Plan Draft Environmental Impact
Report/Environmental Impact Statement**
State Clearinghouse #: 2003122057
AQMD NO: SAC200400073

Dear Mr. Angell:

Thank you for submitting the *Rio Del Oro Specific Plan Draft Environmental Impact Report/Environmental Impact Statement* to the Sacramento Metropolitan Air Quality Management District (District) for review. District staff comments follow.

- | | | |
|---|--|----------|
| <p>1. The District endorses Appendix L, the <i>Rio Del Oro Air Quality and Emissions Reduction Plan</i>. The District anticipates that implementation of the Mitigation Measures described in the plan will lead to a 15 percent reduction in Operational Emissions from projects located within the specific plan area.</p> | | SMAQMD-1 |
| <p>2. There is a close relationship between land use decisions and air quality. It is the position of the district that personal vehicle use and vehicle miles traveled (VMT) decline when the average residential density of an area increases. This decline in VMT results in a reduction in vehicle emissions. Consequently, it is the position of the District that the <i>High Density Alternative</i> will have the least impact on regional air quality. The district recommends that the city implement the <i>High Density Alternative</i>.</p> | | SMAQMD-2 |
| <p>3. Section 3.15, page 22 contains a description of <i>Mitigation Measure 3.15-1: Implement measures to Control Construction-Generated Air Pollutant Emissions</i>. This description includes the following statement:</p> <p style="padding-left: 40px;">"The project applicant(s) for all project phases shall pay into SMAQMD's off-site construction mitigation fund to further mitigate construction-generated emissions of NOX that exceed SMAQMD's daily emission threshold of 85 lb/day."</p> <p>The District recommends the addition of the following sentence at the end of the 6th paragraph to clarify how off-site construction mitigation fees are to be calculated:</p> <p style="padding-left: 40px;">"The Final Mitigation fee will be calculated using the most current SMAQMD off-site construction mitigation fee calculation methodology (with the most current fee) available the time of demolition or ground disturbance."</p> | | SMAQMD-3 |

- | | |
|---|----------|
| <p>4. Appendix K includes a list of Air Quality Modeling assumptions used when the calculations for the anticipated short-term construction emissions resulting from phase one of the project were made. The first assumption in the list states "Assume that only approximately half of the area to be developed under phase 1 needs to be graded." The district recommends that this statement be expanded and clarified to demonstrate the basis for this assumption.</p> | SMAQMD-4 |
| <p>5. The district recommends that Appendix K be expanded to include copies of the SMAQMD off-site construction mitigation fee calculation spreadsheets used to determine the estimated off-site construction mitigation fee for the different project alternatives.</p> | SMAQMD-5 |
| <p>6. Finally, this project is subject to the District's rules and regulations at the time of construction. Section 3.15, page 44 contains a summary of regional and local plans, policies, regulations, and laws. Included in this summary is text from the District's <i>Rules and Regulations Statement</i>. This statement has recently been updated to reflect the fact that as of October 26, 2007 <i>Rule 417-Wood Burning Appliances</i> prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments. Please update the text in the Final version of the Rio Del Oro EIR/EIS with the description of rule 417 in the updated <i>Rules and Regulations Statement</i>. A copy of the updated <i>Rules and Regulations Statement</i> is attached to this document</p> | SMAQMD-6 |

Please do not hesitate to contact me at (916) 874-2694 or jhurley@airquality.org if you have any questions regarding this letter.

Sincerely,

Joseph J. Hurley
 Assistant Air Quality Planner Analyst

C: Larry Robinson, Sacramento Metropolitan Air Quality Management District

Enc: Updated *SMAQMD Rules and Regulations Statement*

SMAQMD Rules & Regulations Statement (revised 1/07)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

All projects are subject to SMAQMD rules and regulations in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities or any other construction activity to prevent airborne dust from leaving the project site.

Rule 417: Wood Burning Appliances. Effective October 26, 2007, this rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

- SMAQMD-1 *The comment states that SMAQMD endorses the Rio del Oro Air Quality and Emissions Reduction Plan (Appendix L of the 2006 DEIR/DEIS), noting that implementation of the plan's mitigation measures would lead to a 15% reduction in operational emissions from projects located within the specific plan area.*
- The comment is noted.
- SMAQMD-2 *The comment states that SMAQMD recommends that the City implement the High Density Alternative, as this alternative would have the least impact on regional air quality.*
- The comment is noted. The City will carefully consider the analysis of all alternatives contained in the EIR/EIS before making a decision on the preferred alternative and which alternative will be approved. In addition, USACE will review all alternatives contained in the EIR/EIS and additional information for compliance with applicable regulations, including the Section 404(b)(1) Guidelines (see responses to comments EPA-1, EPA-2, and EPA-11).
- SMAQMD-3 *The comment recommends that 2006 DEIR/DEIS Mitigation Measure 3.15-1, "Implement Measures to Control Construction-Generated Air Pollutant Emissions," add language to clarify how off-site construction mitigation fees are to be calculated.*
- As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, the second bullet point in Mitigation Measure 3.15-1 on 2006 DEIR/DEIS page 3.15-22 is hereby revised to read as follows:
- ▶ The project applicant(s) for all project phases shall pay into SMAQMD's off-site construction mitigation fund to further mitigate construction-generated emissions of NO_x that exceed SMAQMD's daily emission threshold of 85 lb/day. The calculation of daily NO_x emissions is based on the ~~current~~ 2006 cost of \$14,300 to reduce 1 ton of NO_x. The final mitigation fee shall be calculated using the current SMAQMD off-site construction mitigation fee calculation methodology available and fee rate established by SMAQMD at the time of the approval of each project phase. The determination of the final mitigation fee shall be conducted in coordination with SMAQMD before any demolition or ground disturbance occurs for any project phase.
- SMAQMD-4 *The comment recommends substantiating the assumption in 2006 DEIR/DEIS Appendix K that approximately half of the Rio del Oro Phase I site would require grading.*
- This is because much of the site is already graded as a result of the mining activities on-site. The assumption that only half of the site would need to be graded is conservative from an emissions standpoint for CEQA and NEPA analysis purposes, as probably less than half of the site would actually be graded.

SMAQMD-5

The comment recommends that Appendix K of the 2006 DEIR/DEIS include copies of the off-site construction fee calculation spreadsheets.

As shown in Chapter 5 of this FEIR/FEIS, the off-site construction fee calculation worksheets are hereby added as Appendix K-6 of the 2006 DEIR/DEIS.

SMAQMD-6

The commenter provides updated SMAQMD rule language, as Rule 417—Wood Burning Appliances has been recently updated.

As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, page 3.15-14 of the 2006 DEIR/DEIS is hereby revised as follows to reflect the addition of the new SMAQMD rule language:

- ▶ **Rule 417: Wood Burning Appliances.** Installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments is prohibited.

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January 29, 2007

Patrick Angell

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

Subject: California American Water Comments on the Draft Environmental Impact Statement for the Rio Del Oro Specific Plan

Dear Mr. Angell:

California American Water's existing Security Park service area boundary is within the proposed Rio Del Oro project, and in fact encompasses a significant portion of the Rio Del Oro project. Cal-Am concurs with the concept that Cal-Am will serve future development within its Security Park service area with wholesale water purchased from SCWA Zone 40. For the convenience of development, a change to the Security Park service area boundary seems reasonable; however, the following exceptions are taken:

- Modifying the service area boundary is not a trivial matter and it is the opinion of Cal-Am that the DEIR has not weighted this issue accordingly.
- As of current, Cal-Am has not been involved in discussions of a redraw of the Security Park service area boundary, nor has Cal-Am approved or consented to any modifications to the Security Park service area boundary as the plan indicates.
- Any modifications to the Cal-Am Security Park service area boundary shall require approval by Cal-Am, and will involve approvals by the CPUC, LAFCO, and the County.
- Prior to any agreement to modify the Cal-Am Security Park service area boundary, Cal-Am will require a clear understanding of the infrastructure configuration, pumping and storage needs, ownership of infrastructure, and points of connection to Zone 40.

California American
Water
4701 Beloit Drive
Sacramento, CA 95838-
2434
T (916) 568-4251
F (916) 568-4260

Cal-Am-1

Cal-Am-2

- It appears that reclaimed water is intended to be used for major landscape and public park irrigation. The DEIR lacks details relative to amount of water offset, ownership, and system requirements for use of this resource.

Thank you for the opportunity to comment on this DEIR for the Rio Del Oro Specific Plan. It is the intention of Cal-Am to work toward a mutually beneficial solution to the water needs of this project. If you have any questions, or need further information, please let me know.

Sincerely,

John Kilpatrick, P.E.
Sr. Planning Engineer

CC: Anna Sutton / U.S. Army Corps of Engineers
Tom Glover / Cal-Am
Andy Soule / Cal-Am
Alicia Brundage / Cal-Am
Fred Feizollahi / Cal-Am
Raymond Yang / Cal-Am

Cal-Am-1

The comment asserts that the 2006 DEIR/DEIS has not sufficiently weighed the issue of modifying the California American Water Company (Cal-Am) service area boundary, and states that modifications to the Cal-Am Security Park service area boundary must be approved by Cal-Am, the California Public Utilities Commission, the LAFCo, and the County.

The Security Park area is a small industrial area serviced by a Cal-Am water system. The Security Park region of the draft *Rio del Oro Plan Area Water Supply Master Plan* (Draft Rio WSMP) includes both the Security Park and lands immediately surrounding it, and therefore includes some of the lands that are located within the project site. However, the Security Park itself is not part of the project site. It is expected that water supply for both the existing Security Park and the new-growth portion of the larger franchise area would be wholesaled from Zone 40 to Cal-Am.

The existing Cal-Am service area is within the project site, but is a rectangular shape that does not follow proposed land uses and street alignments for the project site. The service area cuts through proposed residential subdivisions, commercial lots, park sites, and school sites. Currently, the parcels split by the boundary would require service by the two separate water purveyors. SCWA has proposed a boundary modification to Cal-Am that provides a more logical separation between the Zone 41 retail area and the Cal-Am retail area. Cal-Am is currently reviewing the proposed boundary change and water service agreements. For the proposed boundary adjustment and water supply agreements to take place, however, several steps must be taken. A formal request for a service boundary change must be made to the City, Cal-Am must accept the proposed boundary change, the California Public Utilities Commission (CPUC) and the Sacramento LAFCo must approve the proposed boundary change, and SWCA and Cal-Am must enter into a wholesale water agreement.

The engineers for the project applicant(s) met with Cal-Am on March 1, 2007, to provide additional information on the proposed boundary modification. An executive summary of the project and boundary adjustment history was sent to Cal-Am on April 4, 2007. Also on April 18, 2007, the City made the formal request to change the Cal-Am service area. In October 2007, Cal-Am requested a copy of the Draft Rio WSMP and the *Non-Potable Water Study for Rio del Oro*, and Wood Rodgers provided copies of these documents on October 26, 2007. In August 2009, John Kilpatrick, senior planning engineer at Cal-Am, contacted Wood Rodgers, stated that he was proceeding with processing of the Cal-Am boundary adjustment, and requested the CAD files of the boundary change. Wood Rodgers provided the CAD file on August 12, 2009.

Cal-Am-2

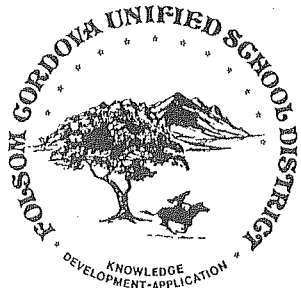
The comment states that Cal-Am requires understanding of infrastructure needs prior to modification of the Security Park area boundary.

See response to comment Cal-Am-1, above.

Cal-Am-3

The comment states that the 2006 DEIR/DEIS lacks details about the amount of water offset, ownership, and system requirements for use of reclaimed water for major landscape and public park irrigation.

Please see the following text in the 2008 RDEIR/SDEIS: Impact 3.5-8; Tables 3.5-20, 3.5-21, 3.5-22, and 3.5-23; and Exhibit 3.5-2.



FACILITIES AND PLANNING DEPARTMENT

Folsom Cordova Unified School District

945 Riley Street ♦ Folsom, CA 95630-3002
Phone: (916) 355-1111x184 ♦ Fax: (916) 294-0725

January 29, 2007

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

RE: Response to the Rio del Oro Specific Plan Draft EIR

Dear Mr. Angell:

The Folsom Cordova Unified School District provides the following response regarding the Draft Environmental Impact Report (EIR) for the Rio del Oro Specific Plan. Our review is based on the data available at the time the Draft EIR was prepared; specifically related to enrollment, capacities, student yield rates and housing development timelines.

The following comments should be incorporated into the revised EIR:

- The teacher-student ratio is 1:32 for grade K, 1:19 for grades 1-3, 1:31 for grades 4-6, 1:27 for grades 7-8 and 1:28 for grades 9-12. Special education classes generally have a teacher-student ratio of 1:12 or less and continuation high classes do not exceed 1:15 (Page 3.6-3).
- The following elementary schools are K-5: Cordova Meadows, Mather Heights, Oak Chan, PJ Shields, SJ Gallardo, Williamson; Folsom Lake High is a 9-12 school site (Page 3.6-3).
- Sandra J. Gallardo serves K-5 pupils (Page 3.6-4).
- Funding for construction of new schools is a three-legged system consisting of State funds (if eligible), development impact fees and local funding. Although the State School Building Program calls its new construction program a 50-50 State and local share program, the amount provided by the State (if eligible) is based on a per-pupil grant and generally funds only 1/3 of the project. Generally, development impact fees fund approximately 1/3 of the project and the remainder of the project is funded through local

FCUSD-1

FCUSD-2

FCUSD-3

sources such as General Obligation bonds, Certificates of Participation and Mello-Roos taxes (Page 3.6-4).

FCUSD-3
Cont.

- The development impact fee is an insufficient amount to fund 50% of new school facility construction (Pages 3.6-14, -15, -16, -17, -22, -24).
- The school impact fee is deemed to be full and complete mitigation of impacts of the development for which the fee is paid (Government Code 65996). Although in reality, the fee is not adequate to fully fund 50% of the facilities needed to adequately house all of the students generated by the new development (Pages 3.6-14, -15, -16, -17, -22, -24).
- Development impact fees only apply to the construction of school facilities and do not fund any operational costs of new schools (Pages 3.6-14, -15, -16, -17).
- The proposed project alternatives could have a significant, direct impact on school services and facilities if the local funding portion for the required future schools is not secured (Pages 3.6-22, -24, -25).

FCUSD-4

The capacities, enrollment and student yield rates have changed since the time the EIR was written. The District will continue to work with the developers to insure that the appropriate number of school sites is reserved as the plan and student yield rates change over time.

FCUSD-5

In addition to State funding and development impact fees, an additional local funding source will need to be identified to provide the necessary school facilities to adequately house the students generated by this project.

Thank you for the opportunity to review and comment on the Draft EIR. Please call me if you have any questions or need additional information.

Sincerely,



Geri Wickham
Planning/Project Manager

cc: Anna Sutton, US Army Corps of Engineers
Debbie Bettencourt, FCUSD
Matt Washburn, FCUSD

FCUSD-1

The comment provides corrected teacher-student ratios for schools in the Folsom Cordova Unified School District (FCUSD) for inclusion in the 2006 DEIR/DEIS.

As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, the first full paragraph on page 3.6-3 is hereby revised as follows:

The Folsom Cordova Unified School District (FCUSD) provides educational services to approximately 18,000 students in the cities of Folsom and Rancho Cordova. FCUSD schools currently include 19 elementary schools, four middle schools, and two high schools, plus continuing-education high schools and adult education. The teacher-student ratio is ~~1:49~~ 32 for K, ~~1:19~~ for grades 1–3, 1:31 for grades 4–6, 1:27 for grades 7–8, and ~~1:29~~ 28 for grades 4 ~~9–12~~. Special education classes generally have a teacher-student ratio of 1:12 or less, and continuation high schools have a ratio of 1:15 of less. On a district level, FCUSD is operating at or near capacity for its elementary and high schools. The school district has experienced considerable growth in the past few years. Table 3.6-1 identifies the 2003–2004 school year enrollment for FCUSD in September 2003.

FCUSD-2

The comment clarifies which elementary schools are grades K–5 rather than K–6 and corrects the status of Folsom Lake High School listed in the 2006 DEIR/DEIS.

As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, Table 3.6-1 on page 3.6-3 of the 2006 DEIR/DEIS is hereby revised as follows:

School Name	Grade	Current Enrollment	Student Capacity	% of Capacity	Remaining Capacity
Blanche Sprentz Elementary	K	353	383	92	30
Carl Sundahl Elementary	K–6	435	534	81	99
Cordova Gardens Elementary	K–6	421	464	91	43
Cordova Lane Elementary	K–5	586	598	98	12
Cordova Meadows Elementary	K–6 <u>5</u> 4	14	459	90	45
Cordova Villa Elementary/ Reymouth	K–5 <u>5</u>	07	483	105	-24
Empire Oaks Elementary	K–5	409	598	68	189
Folsom Hills Elementary	K–6	580	689	84	109
Gold Ridge Elementary	K–5	544	598	91	54
Mather Heights Elementary	K–6 <u>5</u> 3	69	422	87	53
Natoma Station Elementary	K–6	593	672	88	79
Oak Chan Elementary	K–6 <u>5</u> 5	96	641	93	45
PJ Shields Elementary	K–6 <u>5</u> 3	81	453	84	72
Rancho Cordova Elementary	K–6	441	566	78	125
Riverview Elementary	K–6	257	351	73	94
Sandra J. Gallardo Elementary	K–6 <u>5</u> 5	91	618	96	27
Theodore Judah Elementary	K–6	348	547	64	199
White Rock Elementary	K–6	593	642	92	49

School Name	Grade	Current Enrollment	Student Capacity	% of Capacity	Remaining Capacity
Williamson Elementary	K–5	406	428	95	22
Folsom Middle	6–8	1,059	1,194	89	135
Mills Middle	6–8	1,112	1,170	95	58
Mitchell Middle	6–8 7	34 8	51	86	117
Sutter Middle	6–8	1,027	1,378	75	351
Cordova High	9–12 2	,108 2	,148	98	40
Folsom High	9–12	2,537	2,268	112	-269
Folsom Lake High (Continuation)	10 9–12	109 1	58	69	49
Kinney High (Continuation)	9–12	238	225	106	-13
Kitty Hawk (Alternative)/Mather Youth Academy Community Day	6–12	117	225	52	108
Walnutwood High (Alternative)	1–12	176	158	111	-18

^a Student enrollment in the district changes daily as more students enroll and others leave; therefore, Table 3.6-1 does not reflect exact current (2009) enrollment.
Sources: California Department of Education, Educational Demographics Unit 2004; FCUSD 2004

In addition, the second sentence of the first full paragraph on page 3.6-4 is hereby revised as follows:

The district opened Sandra J. Gallardo Elementary School for K–~~6~~5 students in August 2004 to accommodate rapid growth in the Folsom area.

FCUSD-3

The comment corrects the discussion in 2006 DEIR/DEIS Section 3.6 regarding funding for construction of new schools.

As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, the fourth full paragraph on page 3.6-4 is hereby revised as follows:

The school district is funded by 50% state and 50% local sources. State funding is based on a per-pupil grant. The district can receive local funding through developer impact fees, tax revenue from Mello-Roos districts, and General Obligation (GO) bonds. Developer impact fees are the major source of funding for the district and generally finance approximately one-third of school construction costs. In addition to developer impact fees, FCUSD can receive local funding through tax revenue from Mello-Roos districts and General Obligation (GO) bonds. Based on its Facility Needs Assessment, FCUSD demonstrated the need to for levy Level II developer fees (described in Section 3.6.2, “Regulatory Framework”) in the Rancho Cordova SFID that are higher than the statutory fee. As of August 2005, Level II fees for residential development are \$4.57 per square foot and \$0.36 per square foot for commercial/industrial construction (FCUSD 2005). Developer fees may be used to finance construction of new schools and equipment, and to reconstruct existing facilities to maintain adequate housing for all the district’s students. Mello-Roos districts are defined tax areas usually associated with new residential subdivisions, which are often used for additional school taxes.

The comment provides clarification on the sufficiency of the development impact fee to fund construction of new school facilities and of the school impact fee to fund construction of facilities needed to house students generated by new development. The comment further states that the project alternatives could have a significant, direct impact on school services and facilities if the local funding portion for the required future schools is not secured.

Payment of the development impact fees would provide the maximum level of funding legally required under state law, and would fully mitigate project-related impacts on schools. With payment of the state-mandated school impact fees, implementation of the Proposed Project Alternative would have a less-than-significant, direct impact on school services and facilities in the long term. Regardless, the project applicant(s) have prepared a public facilities financing plan to ensure that adequate local funding is available to provide school facilities necessary to serve the project, which will be subject to Tier 2 entitlement process for the project (see Chapter 2 of this FEIR/FEIS).

As shown in Chapter 5 of this FEIR/FEIS, the discussion of Impact 3.6-5 under the Proposed Project Alternative that appears in the first paragraph on 2006 DEIR/DEIS page 3.6-14 is hereby revised as follows:

As required by state law, the project applicant(s) would pay the state-mandated school impact fees to FCUSD. As of August 2005, the developer is charged Level II fees of \$4.57 per square foot for residential development and \$0.36 per square foot for commercial development in the FCUSD boundaries. The City would determine the assessable square footage that would be subject to the fee at the time of development (FCUSD 2005). ~~For FCUSD,~~ this fee is typically an insufficient amount to fund ~~100% of~~ new school facility construction. Thus, other local funding sources (see discussion in “Affected Environment”) would be needed to construct schools. However, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. (Government Code Section 65996.) With payment of the state-mandated school impact fees, and assuming that all six proposed elementary schools are constructed, implementation of the Proposed Project Alternative would have a **less-than-significant, direct** impact on school services and facilities in the long term. **No indirect** impacts would occur.

As shown in Chapter 5 of this FEIR/FEIS, the second paragraph of the discussion of Impact 3.6-5 under the High Density Alternative on 2006 DEIR/DEIS page 3.6-14 is hereby revised as follows:

The project applicant(s) would pay the state-mandated school impact fees to FCUSD. ~~For FCUSD,~~ this fee is typically an insufficient amount to fund ~~100% of~~ new school facility construction ~~and operation~~; however, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. Therefore, implementation of the High Density Alternative would have a **less-than-significant, direct** impact on school services and facilities in the long term. **No indirect** impacts would occur.
[Greater]

As shown in Chapter 5 of this FEIR/FEIS, the second paragraph of the discussion of Impact 3.6-5 under the Impact Minimization Alternative on page 3.6-15 is hereby revised as follows:

The project applicant(s) would pay the state-mandated school impact fees to FCUSD. ~~For FCUSD, this fee is typically an insufficient amount to fund 100% of new school facility construction and operation;~~ however, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. Therefore, implementation of the Impact Minimization Alternative would have a **less-than-significant, direct** impact on school services and facilities in the long term. **No indirect** impacts would occur.
[Lesser]

As shown in Chapter 5 of this FEIR/FEIS, the discussion of Impact 3.6-5 under the No Federal Action Alternative that appears in the first paragraph on page 3.6-15 is hereby revised as follows:

The project applicant(s) would pay the state-mandated school impact fees to FCUSD. ~~For FCUSD, this fee is typically an insufficient amount to fund 100% of new school facility construction and operation;~~ however, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. Therefore, implementation of the No Federal Action Alternative would have a **less-than-significant, direct** impact on school services and facilities in the long term. **No indirect** impacts would occur.
[Lesser]

As shown in Chapter 5 of this FEIR/FEIS, the discussion of Impact 3.6-6 under the Proposed Project Alternative that appears in the first paragraph on page 3.6-16 is hereby revised as follows:

As discussed above, the project applicant(s) would pay the state-mandated school impact fees to FCUSD. ~~For FCUSD, this fee is typically an insufficient amount to fund 100% of new school facility construction and operation;~~ however, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. Therefore, implementation of the Proposed Project Alternative would have a **less-than-significant, direct** impact on school services and facilities in the long term. **No indirect** impacts would occur.

As shown in Chapter 5 of this FEIR/FEIS, the second paragraph of the discussion of Impact 3.6-6 under the High Density Alternative on page 3.6-16 is hereby revised as follows:

As discussed above, the project applicant(s) would pay the state-mandated school impact fees to FCUSD. ~~For FCUSD, this fee is typically an insufficient amount to fund 100% of new school facility construction and operation;~~ however, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. Therefore, implementation of the High Density Alternative would have a **less-than-significant, direct** impact on school services and facilities in the long term. **No indirect** impacts would occur.
[Greater]

As shown in Chapter 5 of this FEIR/FEIS, the second paragraph of the discussion of Impact 3.6-6 under the Impact Minimization Alternative on page 3.6-17 is hereby revised as follows:

As discussed above, the project applicant(s) would pay the state-mandated school impact fees to FCUSD. ~~For FCUSD, this fee is typically an insufficient amount to fund 100% of new school facility construction and operation;~~ however, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. Therefore, implementation of the Impact Minimization Alternative would have a **less-than-significant, direct** impact on school services and facilities in the long term. **No indirect** impacts would occur.
[Lesser]

As shown in Chapter 5 of this FEIR/FEIS, the second paragraph of the discussion of Impact 3.6-6 under the No Federal Action Alternative on page 3.6-17 is hereby revised as follows:

As discussed above, the project applicant(s) would pay the state-mandated school impact fees to FCUSD. ~~For FCUSD, this fee is typically an insufficient amount to fund 100% of new school facility construction and operation;~~ however, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. Therefore, implementation of the No Federal Action Alternative would have a **less-than-significant, direct** impact on school services and facilities in the long term. **No indirect** impacts would occur.
[Lesser]

As shown in Chapter 5 of this FEIR/FEIS, the last paragraph of the discussion of Impact 3.6-11 under the Proposed Project Alternative on page 3.6-21 (continuing onto page 3.6-22) is hereby revised as follows:

Because the Phase 1 elementary school would not have sufficient capacity for all 800 students generated during development Phase 1, approximately 188 students would not be accommodated by this school facility. Portable classrooms could be added to existing school sites to accommodate additional students, or students could be bused to nearby schools that have additional capacity (Washburn, pers. comm., 2005). However, as required by state law, the project applicant(s) would pay the state-mandated school impact fees to FCUSD to mitigate impacts on schools. As of August 2005, the developer is charged Level II fees of \$4.57 per square foot for residential development and \$0.36 per square foot for commercial development in the FCUSD boundaries. The City would determine the assessable square footage that would be subject to the fee at the time of development (FCUSD 2005). ~~For FCUSD, this fee is typically insufficient to fund 100% of new school facility construction.~~ Thus, other local funding sources (see discussion in “Affected Environment”) would be needed to construct schools. However, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. With payment of the state-mandated school impact fees, implementation of the Proposed Project Alternative would have a **less-than-significant, direct** impact on school services and facilities in the short term. **No indirect** impacts would occur.

As shown in Chapter 5 of this FEIR/FEIS, the discussion of Impact 3.6-12 under the Proposed Project Alternative that appears in the first paragraph on page 3.6-24 is revised as follows:

As required by state law, the project applicant(s) would pay the state-mandated school impact fees to FCUSD. As of August 2005, the developer is charged Level II fees of \$4.57 per square foot for residential development and \$0.36 per square foot for commercial development in the FCUSD boundaries. The City would determine the assessable square footage that would be subject to the fee at the time of development (FCUSD 2005). ~~For FCUSD, this fee is typically insufficient to fund 100% of new school facility construction.~~ Thus, other local funding sources (see discussion in “Affected Environment”) would be needed to construct schools. However, the California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA. Because the project applicant(s) would pay the state-mandated school impact fees, and because the Phase 1 combined middle school/high school would have sufficient capacity to accommodate students living at the project site, implementation of the Proposed Project Alternative would have a **less-than-significant, direct** impact on school services and facilities in the short term. **No indirect** impacts would occur.

FCUSD-5

The comment notes that school capacities, enrollment, and student yield rates have changed since the time the 2006 DEIR/DEIS was prepared and that these rates will continue to change over time. The comment also states that an additional local funding source for new school facilities will need to be identified.

Thank you for noting that the capacities, enrollment, and student yield rates have changed since the time the 2006 DEIR/DEIS was prepared and that these rates will continue to change over time. No revisions to the 2006 DEIR/DEIS are required.

The project applicant(s) will continue to coordinate with FCUSD through development of all project phases to ensure that the available school sites would have sufficient capacity to meet the demands of students and to ensure there would be no shortfall of school services or facilities. In addition, the project applicant(s) have prepared a public facilities financing plan to identify adequate funding sources for school facilities necessary to serve the project, which will be subject to Tier 2 entitlement process for the project (see Chapter 2 of this FEIR/FEIS).

Department of Water Resources
Keith DeVore, Director



Including service to the cities of
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SACRAMENTO COUNTY
WATER AGENCY

TO: Patrick Angell
PAngell@pacificmunicipal.com
Rancho Cordova Planning

FROM: Daniel Jones
Assistant Engineer II
Sacramento County Water Agency

DATE: January 31, 2007

SUBJECT: Comments for the Rio Del Oro Specific Plan Project Draft Environmental Impact Report/Environmental Impact Statement

Thank you for the opportunity to comment on the Rio Del Oro Specific Plan Project Draft Environmental Impact Report/Environmental Impact Statement. The comments that follow have been discussed with various interested parties during the past several years. There are several significant outstanding issues that need resolution in order to meet certain conditions.

General Comments:

1. The *Rio Del Oro Plan Area Water Supply Master Plan Draft August 2004* is cited as the basis for water supply discussions in the Specific Plan and Specific Plan DEIR. Much of the information in this Draft August 2004 Master Plan is outdated and it contains a number of factual errors.
2. The Water Agency has not received any data to support the proposed phasing of water supply infrastructure and therefore cannot determine if the proposed phasing of water facilities construction/projections of cost are accurate.
3. There is as yet no wholesale agreement between Golden State Water Company and the Water Agency for an interim (“gap”) supply of water for initial development; until the terms of such an agreement are defined, it is not possible to determine what facilities will need to be constructed with the initial phase, nor the limits of initial development if this is to be the source of water supply.
4. A portion of proposed Phase 1B lies in the California American Water Company service area. Given that there has been no response from Cal-Am regarding boundary adjustments and wholesale supply from SCWA, these documents need

SCWA-1

SCWA-2

SCWA-3

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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

to acknowledge the existing boundary and Cal-Am must determine if it can provide water in its service area. The existing service area boundary also bisects a number of proposed residential parcels, which is not acceptable.

SCWA-3

5. The City has adopted resolution 11-2006 requiring installation of a non-potable water system: a study is required that identifies proposed non-potable water uses, configuration of a distribution system (including storage), and estimated costs.

SCWA-4

6. The Rio Del Oro Land Use Plan maps shown in the Specific Plan and Specific Plan DEIR/EIS do not show where the required water supply infrastructure will be located. The Land Use Plan maps must show water supply infrastructure needed to supply water to Rio Del Oro as shown in the current version of the Zone 40 Water System Infrastructure Plan (WSIP).

SCWA-5

If you have any questions, please feel free to contact me. Thank you,

Daniel Jones
Sacramento County Water Agency
(916) 874-6084
jonesd@saccounty.net

Note to the Reader: This commenter sent identically worded letters to the City of Rancho Cordova and USACE on January 31, 2007. The responses below respond to the identical comments presented in both letters.

SCWA-1 *The comment states that information in the Rio del Oro Plan Area Water Supply Master Plan Draft August 2004 is outdated and that the master plan contains factual errors.*

The 2004 WSMP was based on the most current information available from SCWA at the time. SCWA adopted a new water system infrastructure plan in November 2006. An updated WSMP was submitted on April 2, 2007. The use of the information contained in the Draft Rio WSMP was limited to land use and water demands under the Proposed Project Alternative to calculate buildout water demands for the project. The information identified in the Draft Rio WSMP is a reliable source of land use and water demands. (See also Master Response 1, “Adequacy of Long-Term Water Supply,” in Chapter 3 of this FEIR/FEIS.)

SCWA-2 *The comment states that SCWA has not received any data to support the proposed phasing of water supply infrastructure and therefore cannot determine whether the proposed phasing of water facilities construction and cost projections are accurate. The comment also states that there is as yet no wholesale agreement between Golden State Water Company (GSWC) and SCWA for an interim (“gap”) supply of water, so it cannot be determined what facilities will need to be constructed with the initial phase.*

As discussed in the 2008 RDEIR/SDEIS on page 3.5-35, GSWC would supply water to SCWA, and new GSWC water conveyance infrastructure would be required to convey initial water to SCWA’s existing infrastructure in White Rock Road to supply the initial water for the project. The 2008 RDEIR/SDEIS acknowledges that for GSWC to deliver an initial water supply, an agreement must be reached with SCWA describing capital improvements required to deliver the water, the source of funding for any such improvements, the price of initial water, and a commitment of the initial supply. Other existing agreements that address water supply in this area may need to be amended. It is expected that GSWC could begin to deliver water within 6–12 months after execution of a wholesale water delivery agreement with SCWA. The project applicant(s) are currently working with GSWC and SCWA to secure any necessary agreements to provide initial water supplies to the project.

In February 2007, SCWA indicated that it would take the lead in drafting a wholesale agreement with GSWC to supply gap water to Rio del Oro. Although no agreement yet exists between SCWA and GSWC for delivery of the initial water supply to the project site, the 2008 RDEIR/SDEIS, based on meetings with SCWA, describes the anticipated off-site water conveyance facilities for the initial water supply. (See Impact 3.5-3 on page 3.5-42 of the 2008 RDEIR/SDEIS.)

As described in the 2008 RDEIR/SDEIS (Exhibit 3.5-1), these facilities would include a new 16-inch water transmission main connecting an existing GSWC storage tank to an existing 16-inch SCWA transmission main, and then to project facilities. The new pipeline would originate at an existing 5-million-gallon storage tank within the Villages at Zinfandel development southwest of the project site. The line would follow Baroque Drive north to Kilgore Road, then north to White Rock Road, and would then follow

White Rock Road across the Folsom South Canal. The new transmission main would be placed underground parallel to an existing GSWC water transmission main within the existing road rights-of-way. The new transmission main would be suspended underneath the existing White Rock Road bridge crossing over the Folsom South Canal, and would connect with SCWA's existing 16-inch transmission main at the intersection of Luyung Drive and White Rock Road. The new water transmission main would require an in-line booster pump to drive water supplies along the intertie. The booster pump would be placed at one of four potential locations, as depicted in Exhibit 3.5-1 of the 2008 RDEIR/SDEIS.

Although the new pipeline is needed to convey initial water supplies from the GSWC system to the project area, it would remain in use after the long-term water supplies for the project were constructed and online. The pipeline would then serve as an active intertie between GSWC's existing system and the existing SCWA system. As such, the pipeline would provide redundancy to both systems and act as a conveyance mechanism for SCWA to provide replacement water to GSWC in the future.

Furthermore, the 2008 RDEIR/SDEIS acknowledges that the new GSWC infrastructure described above, required for initial water conveyance facilities to serve the project, has not been constructed and that final design plans and specifications have not been submitted or approved. These off-site water conveyance facilities have not been subject to CEQA or NEPA compliance; therefore, the 2008 RDEIR/SDEIS provides a site-specific impact analysis, noting in Impact 3.5-3 that the water supply pipeline would be placed in previously disturbed rights-of-way of existing roads.

SCWA-3

The comment states that a portion of the proposed Phase 1B lies within the Cal-Am water service area, and that the 2006 DEIR/DEIS must acknowledge that Cal-Am must determine if it can provide water. The comment also states that the existing service area boundary unacceptably bisects proposed residential parcels.

See response to comment Cal-Am-1, above.

SCWA-4

The comment states that because the City has adopted a resolution requiring installation of a nonpotable water system, a study must be prepared identifying proposed nonpotable water uses, configuration of a distribution system (including storage), and estimated costs.

A preliminary study titled *Non-Potable Water Study for Rio del Oro Specific Plan Area* (dated February 2007) was submitted to SCWA on January 31, 2007. The study identified the service area and demands for nonpotable water and presented the proposed nonpotable-water backbone system. A preliminary cost estimate was also included. Storage facilities, including pumps, were not analyzed or presented in detail because the exact source and supply of nonpotable water is not known at this time.

SCWA-5

The comment states that the Rio del Oro land use plan maps do not show where the project water supply infrastructure from Zone 40 water supply will be located, and that this information must be included in the land use plan.

The proposed Rio del Oro land use plan shows the proposed water supply infrastructure per the approved *Zone 40 Water System Infrastructure Plan* (April 2006). See 2006 DEIR/DEIS Exhibits 2-8a, 2-8b, and 2-8c. The Rio del Oro land use maps and water maps are consistent with the *Zone 40 Water System Infrastructure Plan* in showing on-

site water supply infrastructure. Exhibits referenced are from the Draft Rio WSMP and the *Zone 40 Water Supply Infrastructure Plan*.

Storage tanks and pump stations are shown located north of White Rock Road and in the Security Park. Clarification is needed from SCWA whether additional infrastructure is required. See also Master Response 1, “Adequacy of Long-Term Water Supply,” in Chapter 3 of this FEIR/FEIS for further information.

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County Executive
Terry Schutten

Sacramento County
Airport System

G. Hardy Acree, Director of Airports



County of Sacramento

Sacramento International Airport
Mather Airport
Executive Airport
Franklin Field

February 1, 2007

Mr. Bill Campbell
City of Rancho Cordova
Department of Planning
2729 Prospect Park Drive
Rancho Cordova, CA 95670

RE: City of Rancho Cordova's Draft Environmental Impact Report for Rio Del Oro
Specific Plan; State Clearing House # 2003122057

Dear Mr. Campbell:

The Sacramento County Airport System (Airport System) is pleased to provide comment on the Draft Environmental Impact Report (DEIR) for the Rio Del Oro Specific Plan (Plan). The project site is approximately 1.4 nautical miles east of Mather Airport's Runway 22L at the project's point of closest proximity to the runway. And while significant portions of the site lie directly underneath the final approach course to runway 22L (the primary runway used by large air cargo aircraft) as well as within Mather's 60 dbA Community Noise Equivalent Level contour, the Airport System recognizes and appreciates that the Plan and DEIR were developed to prohibit new residential land uses within the 60 CNEL contour.

The Airport System strongly supports the commitment referenced in Impact 3.1-2 that "no project-related residential development would occur in the 60-db CNEL or above noise contours". The Airport System also strongly supports the full implementation of Mitigation Measures 3.16-5 and 3.16-6 to address identified impacts 3.16-5, 3.16-6, 3.16-11, and 3.16-12 as a condition of approval for development within the project area.

SCAS-1

Regarding mitigation measure 3.16-5, the Airport System recommends that it be amended to include the applicable condition language currently placed upon other similar projects in unincorporated Sacramento County as shown below:

SCAS-2

New project related residential development within the MAPA boundaries but outside the 60 db CNEL contour shall be subject to the following conditions prior to approval by the City of Rancho Cordova:

1. Minimum noise insulation to protect persons from excessive noise within new residential dwellings, including detached single family dwellings, that limits noise to 45 db CNEL, with windows closed, in any habitable room.
2. Notification in the Public Report prepared by the California Department of Real Estate disclosing to prospective buyers that the parcel is located within the applicable Airport Planning Area and that aircraft operations can be expected to overfly that area at varying altitudes less than 3,000 feet Above Ground Level (AGL).
3. Execution and recordation with the Sacramento County Recorder of Avigation Easements prepared by the Sacramento County Counsel's Office on each individual residential parcel contemplated in the development in favor of the County of Sacramento. All avigation easements recorded pursuant to this policy shall, once recorded, be copied to the Director of Airports and shall acknowledge the property location within the appropriate Airport Planning Policy Area and shall grant the right of flight and unobstructed passage of all aircraft into and out of the appropriate airport.

Exceptions: New accessory residential dwellings on parcels zoned agricultural, Agricultural Residential, Interim Agricultural, Interim General Agricultural, or Interim Limited Agricultural, shall be exempt from the Airport Planning Policy Areas prohibitions.

Please do not hesitate to contact me with any questions regarding these comments. Airport staff will certainly be available to assist in the preparation, review, and recordation of any Mather Airport avigation easements that are ultimately required as a condition of approval for residential development within this project. Thank you for your consideration of these comments.

Sincerely,

J. Glen Rickelton
Airport Noise Officer
Sacramento County Airport System

C:
Monica Newhouse – Manager, Planning and Environmental

SCAS-2
Cont.

SCAS-1

The comment expresses support for the commitment to no project-related residential development in the 60-decibel (dB) community noise equivalent level (CNEL) or above noise contours, as expressed in 2006 DEIR/DEIS Impact 3.1-2, "Compatibility with the Mather Airport Land Use Compatibility Plan." The comment also expresses support for the implementation of Mitigation Measures 3.16-5 and 3.16-6, which include a variety of measures intended to improve land use compatibility with noise sources.

The comment is noted.

SCAS-2

The comment recommends that Mitigation Measure 3.16-5, "Implement Measures to Improve Land Use Compatibility with Noise Sources," be amended to include additional language to reflect conditions placed on other similar projects in unincorporated Sacramento County.

As shown in Chapter 5 of this FEIR/FEIS, the following language is hereby added at the end of Mitigation Measure 3.16-5, immediately preceding the specifications for timing and enforcement, on 2006 DEIR/DEIS page 3.16-32:

Project-related residential development within the MAPA boundaries but outside the 60-dB CNEL contour shall be subject to the following conditions before approval by the City of Rancho Cordova:

- ▶ minimum noise insulation to protect persons from excessive noise within new residential dwellings (including detached single-family dwellings) that limits noise to 45 dB CNEL with windows closed in any habitable room;
- ▶ notification in the public report prepared by the California Department of Real Estate disclosing to prospective buyers that the parcel is located within the applicable airport planning policy area and that aircraft operations can be expected to overfly that area at varying altitudes less than 3,000 feet above ground level; and
- ▶ execution and recordation with the County Recorder of aviation easements prepared by the County Counsel's office on each individual residential parcel contemplated in the development. All aviation easements recorded pursuant to this policy shall, once recorded, be copied to the Director of Airports and shall acknowledge the property location within the appropriate airport planning policy area and shall grant the right of flight and unobstructed passage of all aircraft into and out of the appropriate airport.

Exceptions: New accessory residential dwellings on parcels zoned Agricultural, Agricultural Residential, Interim Agricultural, Interim General Agricultural, or Interim Limited Agricultural shall be exempt from the airport planning policy area's prohibitions.

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Regional Transit

Sacramento Regional Transit District
A Public Transit Agency
and Equal Opportunity Employer

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February 2, 2007

Anna Sutton
U.S. Army Corps of Engineers
1325 J Street, Room 1480
Sacramento, CA 95814-2922

NAME OF DEVELOPMENT: Rio del Oro Specific Plan
STATE CLEARINGHOUSE NUMBER: 2003122057
TYPE OF DOCUMENT: DEIR/DEIS

The Rio del Oro Specific Plan project proposes five phases of mixed-use development on 3,828 acres providing 11,601 residential dwelling units (1,920 acres), Village Commercial, Local Town Center, Regional Town Center (153 acres of shopping centers), Business Park (86 acres) and an Industrial Park (282 acres). The site is located south of White Rock Road, north of Douglas Road and east of Sunrise Boulevard in the City of Rancho Cordova.

Bus route 73 currently provides hourly service to the site Monday through Saturday. Sunrise Boulevard south to Douglas Boulevard is identified on Regional Transit's (RT) 20-Year Vision to be a Bus Rapid (BRT) Corridor.

Regional Transit staff has reviewed the Draft Environmental Impact Report/ Environmental Impact Statement and have the following comments:

- | | | |
|---|--|------|
| 1. Figure 3.14-4 needs to be updated with accurate bus routes and the light rail extension to Folsom. | | RT-1 |
| 2. The existing transit service description of light rail service on page 3.14-7 can be updated (the service to Folsom opened in October 2005. Also, please add Route 91 from Roseville to the Sunrise Station. | | RT-2 |
| 3. In light of BRT designations, an Irrevocable Offer of Dedication (IOD) for transit right-of-way shall be provided as a condition of approval and noted on the tentative subdivision map. A 12.5 foot wide area the length of the subdivision and adjacent to Sunrise Boulevard is required to allow for the construction of one transit lane. A 25 feet wide and 200 feet long reservation for future transit facilities along the property is required to allow for the construction of one transit lane and a station area for each BRT station. Other streets designated for BRT by the | | RT-3 |

- | | |
|---|-----------------------|
| <p>City of Rancho Cordova would require the same amount of right-of-way for each BRT lane.</p> | <p>RT-3
Cont.</p> |
| <p>4. Transit supportive development densities need to be in the medium to high-density ranges within ½ mile of bus stops and BRT stations. RT recommends that overall density of development be increased with the higher densities within ¼ to ½ miles of transit corridors.</p> | <p>RT-4</p> |
| <p>5. Contact Robert Hendrix, RT Facilities (916) 649-2759 to determine if bus shelter pads shall be provided. If determined appropriate (by RT) provide bus shelter pads as directed.</p> | <p>RT-5</p> |
| <p>6. Project proponents shall consider the impact of project design on transit accessibility. Physical barriers such as walls, cul-de-sacs, circuitous street patterns and speed bumps all impede access to transit.</p> | <p>RT-6</p> |
| <p>7. Connectivity of pedestrian ways and amenities such as pavers, vertical curbs, tree shading, lighting and trellises will encourage walking to transit.</p> | <p>RT-7</p> |
| <p>8. Transit information shall be displayed in a prominent location in the residential sales/rental office, through a homeowner’s association, or with real estate transactions and in offices/commercial buildings for clients, customers and employees.</p> | <p>RT-8</p> |
| <p>9. Parking competes with transit usage. Therefore, parking should not exceed the required standards for the City.</p> | <p>RT-9</p> |
| <p>10. Bicycle parking facilities should be provided at building/store entrances.</p> | <p>RT-10</p> |
| <p>11. It is recommended that retail, office and commercial buildings be located with no more than two rows of parking between the streets and buildings. Moving the buildings close to the street will increase pedestrian access.</p> | <p>RT-11</p> |
| <p>12. The applicant shall join the 50 Corridor Transportation Management Association.</p> | <p>RT-12</p> |
| <p>13. Prior to the issuance of any building permit, the property owner shall participate in a financing mechanism for the purpose of funding a variety of transportation demand management (TDM) services. The purpose of this financing mechanism is to fund programs and services to implement trip reduction measures that improve mobility and coincidentally reduce air quality impacts. Such programs and services may include but are not limited to:</p> <ul style="list-style-type: none"> a) On-site transportation coordinators and education outreach b) Incentives for alternative mode use such as transit subsidies, guaranteed ride home programs, and bicycle purchase subsidies c) Programs encouraging people to work close to where they live d) Grade school trip pool programs, and e) Transit shuttle system | <p>RT-13</p> |

Additional programs and services may be implemented as appropriate to assist in achieving the targeted reduction in daily vehicle trips.

The project's financing plan will also include their fair-share contribution for capital improvements for future transit services (buses, park and ride facilities, bus maintenance facility, bus stops).

RT-13
Cont.

14. Employers should offer employees subsidized transit passes at 50% or greater discount.

RT-14

15. Develop a program to offer transit passes at a 50% or greater discount to new homeowners for a period of six months or more. Program shall be reviewed and approved by RT prior to approval of any special permit for the project.

RT-15

Thank you for the opportunity to comment. Please send any subsequent documents and hearing notices that pertain to this project as they become available. If you have further questions regarding these recommendations, please contact me at (916) 556-0513 or tcanfield@sacrt.com.

Sincerely,



Traci Canfield
Planner

c: Taiwo Jaiyeoba, Director of Planning, RT
Don Smith, Senior Planner, RT
Robert Hendrix, Facilities Supervisor, RT
Patrick Angell, City of Rancho Cordova

RT-1

The comment states that 2006 DEIR/DEIS Exhibit 3.14-4, “Existing Transit Service,” needs to be updated with accurate bus routes and the light rail extension to Folsom.

As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, Exhibit 3.14-4 has been updated to reflect the current transit routes in the Rio del Oro Specific Plan area.

RT-2

The comment states that the description of light rail service on 2006 DEIR/DEIS page 3.14-7 needs to be updated to reflect service to Folsom, which began in October 2005.

Since initiation of the 2006 DEIR/DEIS, the light rail extension from the Sunrise Boulevard station to the city of Folsom has been completed. This extension operates on 30-minute headways between approximately 5:00 a.m. and 7:00 p.m. in the city of Folsom during typical work weeks. On Saturdays, it operates on 30-minute headways between 7:30 a.m. and 7:00 p.m.; on Sundays and holidays it operates on 30-minute headways between 10:00 a.m. and 7:00 p.m. in Folsom.

The comment also requests that Route 91 be added to the description of fixed-rate bus service in the 2006 DEIR/DEIS.

At the time that the commenter commented on the 2006 DEIR/DEIS, Route 91 provided connectivity between Citrus Heights and Rancho Cordova, beginning near the Interstate 80/Riverside Avenue interchange and extending south along Sunrise Boulevard to the Sunrise Boulevard light rail station. The route operated on 30- to 60-minute headways between approximately 6:00 a.m. and 9:00 p.m. during the work week and on 60-minute headways between 9:45 a.m. and 6:30 p.m. on Saturdays, Sundays, and holidays. However, Route 91 was one of several routes cut by Sacramento Regional Transit’s Board of Directors during its August 27, 2007, meeting in response to a gap in the agency’s adopted fiscal year 2008 budget caused by state budget cuts to transportation. Route 91 was eliminated from service effective January 6, 2008. Therefore, a description of this bus route has not been added to the description of fixed-rate bus service in the 2006 DEIR/DEIS.

RT-3

The comment specifies requirements for transit right-of-way and future transit facilities along the Rio del Oro property.

The City and the project applicant(s) would work with the Sacramento Regional Transit District regarding the details of the Bus Rapid Transit corridor areas within the project site before the approval of subdivision maps.

RT-4

The comment recommends that overall density of development be increased with higher densities within one-quarter to one-half mile of transit corridors.

The proposed Rio del Oro land use plan is generally consistent with the land use and smart growth provisions of the Land Use Element of the City General Plan, as well as the “Conceptual Land Plan for the Rio del Oro Planning Area” (see Figure LU-26 on page 80 of the City General Plan). The proposed land use plan for Rio del Oro includes two sites designated Village Commercial, one designated Local Town Center, and two designated Regional Town Centers. High Density Residential (18.1 to 40 dwelling units per acre

[du/ac]), Medium Density Residential (6.1 to 18.0 du/ac), and Single Family Residential (2.1 to 6.0 du/ac) uses are located immediately adjacent to these sites to promote pedestrian and transit use (see 2006 DEIR/DEIS Exhibit 2-4). This is consistent with the City General Plan's smart-growth concepts promoting pedestrian and transit use, as described on pages 7–14 of the City General Plan's Land Use Element, which calls for these neighborhoods to be designed within 1/3 mile of village and town centers that are expected to have transit service (specifically along Rancho Cordova Parkway).

RT-5 *The comment asks that Robert Hendrix of Regional Transit Facilities be contacted to determine whether bus shelter pads should be provided, and that such pads be provided if found to be appropriate.*

As part of tentative map approval, the City would contact Sacramento Regional Transit to identify whether bus shelter pads should be provided.

RT-6 *The comment asks that the project proponents consider the impact of project design on transit accessibility.*

The project is designed to provide maximum connectivity for alternative modes of travel, consistent with the City General Plan's Circulation Element, which accounts for planned pedestrian, bicycle, and transit facilities. Mitigation Measure 3.14-2 (page 3.14-75 of the 2006 DEIR/DEIS) calls for the project applicant(s) to develop and provide options for alternative transportation modes by implementing pedestrian and bicycle facilities to the satisfaction of the City Public Works Department, and by developing and implementing safe and secure bicycle parking at schools and commercial centers. Mitigation Measures 3.14-3a and 3.14-3b (page 3.14-76 of the 2006 DEIR/DEIS) require the project applicant(s) to participate in capital improvements for transit service and to coordinate with the 50 Corridor Transportation Management Association and comply with the City's transportation system management ordinance.

RT-7 *The comment notes that connectivity of pedestrian ways and amenities such as pavers, vertical curbs, tree shading, lighting, and trellises will encourage walking to transit.*

The roadway standards identified for the Rio del Oro Specific Plan area include a landscaping strip between the travel way and sidewalks that would provide shading for pedestrian travel.

RT-8 *The comment states that transit information shall be displayed in a prominent location in the residential sales/rental office, through a homeowner's association, or with real estate transactions and in office/commercial clients, customers and employees.*

Measure #8 of the *Rio del Oro Air Quality Emissions Reduction Plan* (included as Appendix L of the 2006 DEIR/DEIS) requires transit kiosks to be provided at multiple locations within the specific plan area.

RT-9 *The comment states that parking competes with transit usage, and that therefore, parking for the project should not exceed the required standards for the City.*

The proposal is a specific plan and therefore the City does not have details on a specific development. Parking required for individual development would be subject to the City's Zoning Ordinance. The proposed specific plan project mirrors the City General Plan that promotes other forms of transportation, in regards to the "building blocks" of land use mix, transit planning for the area, bikeways, and trails.

- RT-10 *The comment states that bicycle parking facilities should be provided at building/store entrances.*
- See responses to comments RT-6 and RT-9, above.
- RT-11 *The comment recommends that retail, office, and commercial buildings be located with no more than two rows of parking between the streets and the buildings, to increase pedestrian access.*
- See response to comment RT-9, above.
- RT-12 *The comment states that the project applicant(s) shall join the 50 Corridor Transportation Management Association.*
- As suggested by the commenter, the project applicant(s) will join the 50 Corridor Transportation Management Association.
- RT-13 *The comment states that before the issuance of any building permit, the property owner shall participate in a financing mechanism for funding of programs and services to implement trip reduction measures.*
- As suggested by the commenter, the project shall participate in the City's impact fee program, which currently identifies funding for transit improvements.
- RT-14 *The comment states that employers should offer employees subsidized transit passes at a 50% or greater discount.*
- The comment is noted. The project applicant(s) will work with employers to encourage use of transit facilities in the specific plan area.
- RT-15 *The comment suggests developing a program to offer transit passes at a 50% or greater discount to new homeowners for a period of 6 months or more.*
- The comment is noted. The project applicant(s) will work with developers to encourage use of transit facilities in the specific plan area.

Municipal Services Agency

**Planning and Community
Development**

Robert Sherry, Director

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



Terry Schutten, County Executive
Robert F. Shanks, Interim Agency
Administrator

County of Sacramento

February 5, 2007

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

RE: City of Rancho Cordova Rio Del Oro Specific Plan – Draft Environmental Impact Report

Dear Mr. Angell:

Thank you for the opportunity to review the Draft Environmental Impact Report for the Rio Del Oro Specific Plan area. The staff of the County's Municipal Services Agency has reviewed the document and offers the following comments:

Open Space and Preservation:

The Specific Plan Preferred Alternative land use diagram designates two sites for Open Space/Preserve and one large area in the southern portion of the project area as Wetland Preserve. The Open Space/Preserve areas are surrounded by intensive land uses; therefore, it is doubtful if these preserves will be able to function as habitat preserves in the long term. Please consider alternative plans for the preservation of the elderberry bushes in these areas that will not present as significant of a risk to their long-term survivability, such as ensuring limited access or providing a much larger buffer against intensive land-uses.

ComDev-1

The plan proposes to mitigate for the loss of nearly 300 elderberry bushes by transplanting them to the open space preserves. While Sacramento County approves of the complete mitigation of the elderberry bushes, it is unclear which preserves will be used for the transplanting, or if the mitigation will occur on-site. Due to potential floodway occurrence, the Wetland Preserve may not be the most appropriate area for elderberry transplanting. The County suggests that all mitigation for the elderberry bushes on-site occur within the boundaries of the project area, however, the smaller preserves do not seem sufficient in size to accommodate the number of transplants required (note: 1800 square feet per plant should be provided to allow adequate space and water).

ComDev-2

The Specific Plan Preferred Alternative land use diagram shows a large Drainage Parkway buffering the Morrison Creek channel. This Parkway and adjoining trail serve to connect the various community

ComDev-3

parks together throughout the project area, including potential public access areas with the Wetland Preserve area. This connectivity combined with the proposed location of the Open Space/Preserve areas located adjacent to public parks could create a significant impact from unwanted human disturbance in these preserve areas, which would potentially degrade habitat value of these preserve areas. It is unclear to what extent the preserves will remain off limits to the public while still allowing a connection between them.

ComDev-3
Cont.

Due to the proposed channelization and re-alignment of Morrison Creek, particularly downstream of Rancho Cordova Parkway, it does not appear that a suitable amount of space will be preserved to allow for habitat connectivity to downstream preserves, while still maintaining a public access trail. Sacramento County recommends that a wider buffer be considered along Morrison Creek to allow for a more natural meander and provide additional habitat for movement of species along the corridor while still maintaining a public access trail for the public to enjoy.

ComDev-4

Circulation:

The proposed Specific Plan Circulation diagram designates a number of roadway segments as six-lane thoroughfares. However, only Rancho Cordova Parkway and Americanos Boulevard are designated at that capacity through the length of the project. Both of these proposed roadways run on a northwest-southeast axis. The Specific Plan Circulation diagram does not show any high volume roadways indicated on the diagram that would provide adequate mobility from east to west, for connections between Sunrise Boulevard and eventually Grant Line Road or from northeast to southwest, allowing for alternate routes to Highway 50 and providing a good connection between Douglas Road near Sunrise Boulevard and White Rock Road.

ComDev-5

Villagio Drive should be considered for an upgrade, to a four or six lane arterial through to White Rock, or at least to Rancho Cordova Parkway, which would reduce traffic along Villagio Drive by those avoiding Sunrise and trying to east and north through the project area. This could result in a sufficient traffic reduction as to consider downgrading Rancho Cordova Parkway through the Wetland Preserve to reduce traffic through the preserve and minimize impacts.

ComDev-6

The traffic study does note in traffic mitigation measures 3.14-h,i,l,m,n, and u that the proposed Zinfandel Drive extension would provide additional intersection connectivity, provide parallel capacity improvement, and for mitigation 3.14-u, "must be constructed as a four-lane facility". The financing for the extension is indicated as the Mather Field Specific Plan Facilities Financing Plan. It is unclear whether the City of Rancho Cordova or development fees generated from the Rio Del Oro project would supplement funds for the construction of this facility. As this project impacts a roadway that is located within the County's jurisdiction, shared financing for this extension should be considered.

ComDev-7

Other Concerns:

- The Preferred Alternative land use diagram does not contain any concentrated area(s) of high density housing and retail/office, but instead small, high-density pockets are dispersed throughout the plan. This apparent lack of density concentration could reduce the overall effectiveness of future transit in the project area.

ComDev-8

- The northwest portion of the Rio Del Oro Specific Plan lies within the 60 and 65 cnel noise contours from Mather Field, due to the approach path of aircraft. It is possible that avigation easements be required for proposed areas to be developed within or near these noise contours. We recommend that the City of Rancho Cordova contact the Sacramento County Department of Airports.
- There is some concern over the use of the Wetland Preserve for stormwater detention purposes. The flooding of the Wetland Preserve area could cause significant damage to the vernal pool ecosystems in the Wetland Preserve area.

ComDev-9

ComDev-10

Again, we thank you very much for the opportunity to review and respond to the Draft Environmental Impact Report for the Rio Del Oro Specific Plan Project. If you have any questions or comments, please contact Tim Tadlock or Surinder Singh at 916-874-6141.

Sincerely,



Robert Sherry
Planning Director

cc: Joyce Horizumi, DERA

ComDev-1

The comment requests consideration of alternative areas for preservation of elderberry bushes.

Alternative locations for elderberry preserves (and VELB) were considered. The current location of the proposed preserve consists of the highest density of elderberry plants on the site. According to general compensation guidelines for impacts on VELB, as stipulated by the *Conservation Guidelines for Valley Elderberry Longhorn Beetle* (USFWS 1999), complete avoidance can be assumed when a 100-foot buffer is established and maintained around all elderberry plants containing stems measuring 1 inch or greater in diameter at ground level. The Rio del Oro 12-acre VELB preserve would have 100-foot buffers against surrounding land uses. Further, the preserve is expected to have a high likelihood of survivability because the number of shrubs that currently exist on the site indicates that appropriate conditions exist. Additional mitigation would be provided through purchase of credits at a USFWS approved mitigation bank. Please see revised Exhibit R attached to this FEIR/FEIS, and revised Exhibit 3.10-3 in Chapter 5 of this FEIR/FEIS. See also response to comment ComDev-2, below.

ComDev-2

The comment states that it is unclear which preserves will be used for the transplanting of elderberries, or if the mitigation will occur off-site. The comment also recommends that all mitigation for impacts on elderberries occur on-site.

Mitigation Measure 3.10-4b requires the project applicant(s) to obtain incidental take coverage through the Section 7 consultation process with USFWS. The mitigation measure requires that the relocation of existing elderberry shrubs and planting of new elderberry seedlings be implemented on a no-net-loss basis.

Since publication of the 2006 DEIR/DEIS, the project applicant(s) proposed mitigation plan for VELB has been revised. The revised mitigation plan includes 3,230 elderberry plantings plus 4,170 associated native plantings, totaling 7,400 plantings required for compensatory mitigation. One mitigation credit is equivalent to 10 plants (five elderberry seedlings and five associated native plants) so a total of 740 mitigation credits are needed to compensate for the loss of elderberry shrubs on the project site. The 2009 draft VELB mitigation plan attached as Appendix R to this FEIR/FEIS proposes to establish one 12-acre on-site preserve containing 19 previously existing elderberry shrubs, and plant additional elderberry seedlings and associated native plants in that preserve for a total of 290.4 on-site mitigation credits. The remaining 449.6 credits needed would be purchased from a USFWS approved off-site mitigation bank. The 310 elderberry shrubs that would be directly affected by project implementation would be transplanted either to the on-site preserve or to an appropriate off-site location approved by USFWS.

ComDev-3

The comment states that the connectivity of the drainage parkway to Open Space/Preserve areas and public parks could create a significant impact from unwanted human disturbance in the preserve areas.

As described on page 3.10-28 of the 2008 RDEIR/SDEIS, wildlife-passable boundary fencing would be installed around the preserve, and informational signage or kiosks

would be erected along trails outside the preserve boundary to educate the public about the importance and benefit of wetlands. The Preserve area would not contain any trails.

ComDev-4

The comment states that a wider buffer along Morrison Creek should be required to allow for more natural meander, and to allow for habitat connectivity to downstream preserves.

Morrison Creek would be located mostly within the proposed 507-acre preserve and would maintain its existing meander. The reconstructed portion of the creek west of the preserve is proposed to have a meander consistent with the existing proposed preserve portion of the creek and would be adjacent to a 26-acre detention basin. Morrison Creek leaves the project site at the southwest corner, where the creek is currently piped under Sunrise Boulevard. The Rio del Oro project has incorporated a large extension of the preserve upstream (east) of the project site to allow for connectivity to potential open space corridors to the east.

ComDev-5

The comment states that the specific plan's circulation diagram does not show any high-volume roadways that would provide adequate mobility from east to west.

Two east-west connections in the specific plan area would provide adequate mobility for east-west connections. International Drive extends from the western boundary of the specific plan area to White Rock Road, and Centennial Drive extends eastward from International Drive to the specific plan area's east boundary.

ComDev-6

The comment suggests making Villagio Drive a six-lane road in order to downgrade Rancho Cordova Parkway.

Rancho Cordova Parkway is designated as a six-lane road in the City General Plan. Its location at the southern end of the project site has essentially been fixed by prior project approvals. Making Villagio Drive a six-lane road would not be consistent with the City General Plan, nor would it provide for an adequate connection to areas south of the specific plan area; it would also result in increased impacts to biological resources. Therefore, expanding Villagio Drive would likely not reduce the need for a six-lane road at Rancho Cordova Parkway. See response to comment USFWS-1 for further detail on Rancho Cordova Parkway.

ComDev-7

The comment states that it is unclear whether the City or development fees from the proposed project will pay for the Zinfandel Drive extension. Shared financing should be considered because the roadway is located within the County's jurisdiction.

The extension of Zinfandel Drive from the southern border of the Villages of Zinfandel to Douglas Road would be funded by both the City and the County.

ComDev-8

The comment states that the lack of concentrated high-density housing and office/retail under the Preferred Alternative could reduce the effectiveness of future transit in the project area.

The comment is noted. The land use plan for the Proposed Project promotes transit use by providing mixed-use land uses and dense residential areas that promote alternative forms of transportation consistent with SACOG's preferred Blueprint alternative (see 2006 DEIR/DEIS, page 3.1-25). Please note that the High Density Alternative would also support future transit in the area.

ComDev-9

The comment states that aviation easements could be required for proposed development near the higher noise contours from Mather Field. The comment suggests that the City contact the County Department of Airports.

Mitigation Measure 3.16-5 (2006 DEIR/DEIS page 3.16-32) addresses the requirement for aviation easements. See also response to comment SCAS-2.

ComDev-10

The comment expresses a concern about using the proposed wetland preserve for stormwater detention purposes.

The Rio del Oro project does not include stormwater detention in the wetland preserve. Stormwater detention facilities are located in areas identified as “SWD” within the development portion of the site (see Exhibit 2-9a, “On-Site Water Supply Facilities,” in the 2008 RDEIR/SDEIS). The closest SWD facility is more than 1,000 feet from the proposed wetland preserve.



February 9, 2007

10545 Armstrong Avenue

Mather, CA 95655

Tele: [916] 876-6000

Fax: [916] 876-6160

Website: www.srcsd.com

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

Subject: Draft Environmental Impact Report – Rio Del Oro

The County Sanitation District 1 (CSD-1) and Sacramento Regional County Sanitation District (SRCSD) have reviewed the Draft Environmental Report (EIR) for the Rio Del Oro Planning Area.

Board of Directors

Representing:

County of Sacramento

County of Yolo

City of Citrus Heights

City of Elk Grove

City of Folsom

City of Rancho Cordova

City of Sacramento

City of West Sacramento

The subject area is identified in CSD-1's Sewerage Facilities Expansion Master Plan 2002 and SRCSD's Master Plan 2000, the Aero-Jet and Laguna Creek Interceptors will provide ultimate sewer service to this area, and are currently expected to be fully operational after 2024.

The following are specific comments on the subject document:

1. Page 2-34 Paragraph 5 of the Sewer Section
 - a. SRCSD is in the process of updating the SRCSD Interceptor System Master Plan 2000, and the schedule of completing the Laguna Creek Interceptor in 2024 is subject to change.
 - b. Please revise the sentence to read "Total interim flows into the Bradshaw Interceptor from all projects may not exceed 39 mgd in the year 2020-is on a first come, first served basis."
 - c. References to Laguna Interceptor should be changed to Laguna Creek Interceptor. Laguna Interceptor is not located in the Rio Del Oro area.
2. Page 2-34 Paragraph 6 of the Sewer Section
 - a. Interim facilities as presented in this paragraph are not consistent with SRCSD Interceptor System Master Plan 2000 and the Executive Summary Reconciliation Report. There is no plan for an SRCSD interim pump station within the project area. Please revise this paragraph to reflect the anticipated construction of the Mather Interceptor in 2010.
3. Exhibit 2-10a
 - a. Note 2 – revise the note to read "**Alignment of** interceptors adjacent to Sunrise Blvd, Jaeger Road & Rio Del Oro Parkway **will be address in the upcoming SRCSD Interceptor Master Plan 2007.** ~~to be constructed outside of right of way to the extent possible.~~
 - b. Note 3 – revise the note to read "~~SRCSD has identified a need for a staging area for future tunneling of the Laguna Interceptor. This would require temporary use of a portion of the storm water detention facility.~~ During the design of the basin **storm water detention facility,** placement of wetland mitigation areas should be coordinated with SRCSD to provide for potential interceptor easement requirements."

Technology in balance with nature

SRCSD2-1

SRCSD2-2

SRCSD2-3

Mary K. Snyder
District Engineer

Stan R. Dean
Plant Manager

Wendell H. Kido
District Manager


Marcia Maurer
Chief Financial Officer

Mr. Patrick Angell
February 9, 2007
Page 2

- | | |
|---|-------------------|
| c. Note 4 – This note is inconsistent with SRCSD Interceptor System Master Plan 2000 and 2006 CSD-1 Master Plan Update. Any deviation from either Master Plan will require written approval from CSD-1 and SRCSD. | SRCSD2-3
Cont. |
| d. Note 5 – Any (permanent or temporary) shed shifts between sewer sheds shall require prior written approval from CSD-1 and SRCSD. Shifting flow to CSD-1 S-70 Pump Station conflicts with 2006 CSD-1 Master Plan. | |
| 4. Exhibit 2-10b | |
| a. References to the Laguna Interceptor shall be changed to the Laguna Creek Interceptor. Laguna Interceptor is not located in the Rio Del Oro area. | SRCSD2-4 |
| 5. Page 3.5-3 Paragraph 4 of the Wastewater Section | |
| a. Revise the sentence to “The AJ and Laguna Creek Interceptors, as designated in the 2000 SRCSD Interceptor System Master Plan, would be constructed by SRCSD and would serve the project site beginning in 2020 2024; however, SRCSD is currently updating the Interceptor Master Plan, and the project completion schedule is subject to change.” | SRCSD2-5 |
| 6. Page 3.5-4 Paragraph 1 | |
| a. Revise the last sentence to read “Project-related facilities evaluated include the Bradshaw, AJ, Mather and Laguna Creek Interceptors.” | SRCSD2-6 |

If you have any questions regarding these comments please contact me at (916) 875 7123.

Sincerely,



Michael Meyer
CSD-1/SRCSD
Policy and Planning

cc: Paul Philleo, Neal Allen, Steve Norris, Ruben Robles, Melenie Davis

SRCSD2-1

The comment suggests revising page 2-34, paragraph 5 where it discusses flows into the Bradshaw Interceptor and suggests changing references to the Laguna Creek Interceptor.

As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, the fifth paragraph under “Sewer” on 2006 DEIR/DEIS page 2-34 is hereby revised as follows:

Planned off-site improvements and sewer shed boundaries are shown in Exhibit 2-10b. The Aerojet and Laguna Creek Interceptors, as designated in the *SRCSD Interceptor System Master Plan 2000*, would service the proposed development under the specific plan. The Aerojet Interceptor (Section 2) would run along the western side of the project site, then south along Sunrise Boulevard to a connection point with the Laguna Creek Interceptor. Discharge from the entire Rio del Oro project site would ultimately flow into the Laguna Creek Interceptor, which is not scheduled for completion until after 2024. Interim facilities for portions of the area to be served would flow into the Bradshaw Interceptor upon its completion. Total interim flows into the Bradshaw Interceptor from all projects is on a first-come, first-served basis may not exceed 39 mgd in the year 2020. It is assumed that up to 10 mgd of flows generated by the Rio del Oro project would need to be serviced on an interim basis. Initial development (development Phase 1) of the proposed project would require construction of on-site facilities to a common point near the intersection of Sunrise Boulevard and Douglas Road, where off-site facilities would then be required to convey flows to existing facilities.

SRCSD2-2

The comment points out that page 2-34, paragraph 6 does not include a plan for an SRCSD interim pump in the project area and suggests revising text to reflect the anticipated Mather Interceptor in 2010.

The comment is noted. As shown in Chapter 5 of this FEIR/FEIS, the sixth paragraph under “Sewer” on 2006 DEIR/DEIS page 2-34 is hereby revised as follows:

Interim facilities are shown in Exhibit 2-10c. These interim facilities may be necessary if the Mather Interceptor is not online by 2010. The following features would likely be constructed:

SRCSD2-3

The comment details revisions for the notes in Exhibit 2-10a.

As shown in Chapter 5 of this FEIR/FEIS, the notes on Exhibit 2-10a have been changed to reflect the commenter’s revisions on Notes 2 and 3. The comments on Notes 4 and 5 are noted. These changes will be reflected in the *Rio del Oro Sewer Master Plan*.

SRCSD2-4

The comment requests that “Laguna Interceptor” be changed to “Laguna Creek Interceptor” in Exhibit 2-10b.

In response to the commenter’s request, and as shown in Chapter 5 of this FEIR/FEIS, Exhibit 2-10b has been updated. These updates will also be reflected in the *Rio del Oro Sewer Master Plan*.

SRCSD2-5

The comment details revisions for page 3.5-3 in paragraph 4 of the wastewater section.

In response to the commenter's request, and as shown in Chapter 5 of this FEIR/FEIS, the fifth sentence of the fourth paragraph under "Wastewater" on 2006 DEIR/DEIS page 3.5-3 is hereby revised as follows:

The AJ and Laguna Creek Interceptors, as designated in the 2000 SRCSD Interceptor System Master Plan, would be constructed by SRCSD and would serve the project site beginning in ~~2020-24~~; however, SRCSD is currently updating the Interceptor Master Plan and the interceptor project completion schedule is subject to change.

SRCSD2-6

The comment details revisions for the text on page 3.5-4, paragraph 1.

In response to the commenter's request, and as shown in Chapter 5 of this FEIR/FEIS, the last sentence of the first paragraph of 2006 DEIR/DEIS page 3.5-4 is hereby revised as follows:

Project-related facilities evaluated include the Bradshaw, AJ, Mather, and Laguna Creek Interceptors.

Municipal Services Agency

Department of Water
Resources

Keith DeVore, Director

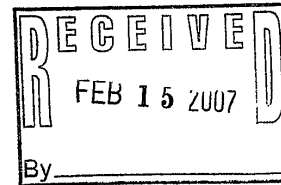


County of
Sacramento

Terry Schutten, County Executive
Cheryl Creson, Agency
Administrator

February 12, 2007

Pam Johns
Rancho Cordova Planning
2729 Prospect Park Drive
Rancho Cordova, CA 95670
Fax: (916) 851-8762



Copy: pjohns@cityofranhocordova.org

Copy: Tim Crush, Wood Rodgers

SUBJECT: Rio Del Oro Draft Environmental Impact Report (DEIR)

Dear Pam:

The Sacramento County Department of Water Resources has reviewed the language in section 3.4, Drainage, Hydrology, and Water Quality of the DEIR along with the conceptual drainage study dated 2005 and provides the following comments.

1. Onsite drainage facilities comprising pump stations and detention basins are represented reasonably well but may undergo minor modifications during further refinement of the drainage study and plan review. | SCDWR2-1
2. The drainage facilities must be reviewed for cost efficiency, functionality and aesthetic qualities. The finance plan and drainage study lend detail to cost and function issues. Likewise, there should be a detailed depiction of the drainage basins and pump stations that details their aesthetic properties. | SCDWR2-2
3. As the Bureau of Reclamation controls the downstream drainage facilities, their approval of the project will be needed. | SCDWR2-3
4. Both the 2003 and 2005 drainage studies propose to apportion the capacity of the Folsom South Canal crossings by contributing drainage area. In the existing condition much of the onsite Rio Del Oro area comprises mining tailings. It is long believed that these tailings do not produce runoff. Thus the apportionment should not include these noncontributing areas. | SCDWR2-4

"Managing Tomorrow's Water Today"

Main: 827 7th St., Rm. 301, Sacramento, CA 95814 • (916) 874-6851 • fax (916) 874-8693 • www.saccounty.net
(search: DWR)

Drainage Operations & Maint.: 3847 Branch Center Rd. #4, Sacramento, CA 95827 • (916) 875-RAIN • fax
(916) 875-7160

- | | |
|---|-----------|
| <p>5. Neither the 2003 or 2005 drainage studies address impacts due to potential increases in volume of runoff. This will be of particular concern at the existing basin upstream of the Folsom South Canal siphons. This location was analyzed for volume impacts in a supplemental study by Wood Rodgers dated April 20, 2006 entitled, "Rio Del Oro: North Offsite Channel Alternative Analysis". This study identified a selection of offsite improvements that would be required to make Sunrise Boulevard passable during a 100 year event. This study should be included as a technical appendix, listed in Section 1.9, or integrated into the 2005 drainage study.</p> | SCDWR2-5 |
| <p>6. Neither the 2003 nor 2005 drainage study discusses impacts and mitigation due to increasing flows (from 68 cfs to 357 cfs) toward the central overchute. This channel is considered to have capacity limitations and the increased flows may have floodplain impacts on the west side of the canal.</p> | SCDWR2-6 |
| <p>7. It is unclear from the exhibits and drainage study what improvements will be required through the wrecking yard located downstream of the subject property.</p> | SCDWR2-7 |
| <p>8. There should be breach analysis performed on all levees associated with the project.</p> | SCDWR2-8 |
| <p>9. Wherever drainage corridors serve as preserves and/or trail systems, it is assumed the aesthetic maintenance and habitat management will be the responsibility of a preserve manager who will be funded separately from any drainage funding mechanisms. The Stormwater Utility will be responsible only for maintenance for drainage, flood control, and stormwater quality.</p> | SCDWR2-9 |
| <p>10. The finance plan should include a component that funds compensation to the miners downstream who are impacted by Rio Del Oro.</p> | SCDWR2-10 |
| <p>11. The DEIR documents the existing and proposed drainage patterns and downstream flow restrictions of the Folsom South Canal, but it does not show how developed flows will meet the downstream constraints. A pump station will be required in the basin in the southwest corner of Phase 1 and there is no mention of this. A drainage study (currently being performed by Wood Rodgers) defining the pump station parameters, and how the downstream flow constraints are met, is necessary. This study will have to be approved by the Sacramento County Department of Water Resources who is currently acting as the City's engineer.</p> | SCDWR2-11 |

12. The water quality detention basins as specified in the study should be sized and designed according to the detention basin criteria outlined in the Sacramento City/County Drainage Manual Volume 2: Hydrology Standards. Since this is a very preliminary document, it is not expected to see the final design shown, but a statement should be included indicating the criteria that will be followed.

SCDWR2-12

13. It is not allowed to release urban stormwater/runoff into creek systems prior to treatment pursuant to Finding No. 57 of the stormwater permit which states: "Federal regulations (40 CFR 131.10(a)) prohibit states from designating waste transport or waste assimilation as a use for any water of the United States... Therefore, storm water treatment and/or mitigation in accordance with Development Standards and any other requirements of this Order must occur prior to the discharge of storm water into a water of the United States." In order to comply with the new stormwater permit, treatment must take place prior to discharge into existing water of the United States, which includes existing creeks.

SCDWR2-13

NOTE: Please see George Booth's comments on the Rio Del Oro finance plan dated January 26, 2007 sent separately.

Sincerely,



Mark Rains
Associate Civil Engineer
(916) 874-8649
Email: rainsm@saccounty.net

CC. George Booth, Pete Hall, Kerry Schmitz, Dalia Fadl – Water Resources
Cyrus Abhar, Albert Stricker, Elizabeth Sparkman – City of Rancho Cordova

- SCDWR2-1 *The comment states that drainage facilities may undergo minor modifications during refinement of the drainage study and improvement plan review.*
- The comment is noted.
- SCDWR2-2 *The comment states that the drainage facilities must be reviewed and the drainage basins and pump stations should be aesthetically detailed.*
- The proposed drainage facilities for Rio del Oro are identified in the 2006 DEIR/DEIS and conceptual drainage study to a level of detail consistent with the requirements of a specific plan. The City convened several workshops on the project between 2004 and 2008; the workshops included consideration of the aesthetic qualities of drainage facilities (detention facilities, open space channels, and pump stations). The proposed drainage facilities will be designed consistent with the City's design principles.
- SCDWR2-3 *The comment states that the U.S. Bureau of Reclamation's approval will be needed because they control the downstream drainage facilities.*
- Consistent with other projects upstream of the Folsom South Canal, the proposed drainage facilities will be subject to review by Reclamation. The drainage facilities constructed by Reclamation across the Folsom South Canal are required to pass upstream drainage flows. The Rio del Oro project's drainage design has been completed consistent with the existing capacity of Reclamation's facilities. Typically, Reclamation reviews project designs to ensure that proposed improvements would not result in 100-year peak flows that threaten to spill into the Folsom South Canal at the overcrossings. The design of the drainage system for Rio del Oro is based on limiting flow from the proposed development to existing capacities at Folsom South Canal crossings. Runoff from the development would not exceed the allowable apportioned flow based on these capacities. Furthermore, the net peak flows from the Rio del Oro site would be less than the existing net peak flows.
- SCDWR2-4 *The comment states that the mining tailings in the Rio del Oro area do not produce runoff and, thus, should not be included in the apportionment of the capacity of the Folsom South Canal crossings.*
- The apportionment presented in the 2005 master drainage study is based on the existing crossings of the Folsom South Canal, which are limited in capacity. These capacities (which are less than existing 100-year flows, whether or not the tailings are contributing runoff), were distributed evenly to the future conditions watershed to present an "allowable" 100-year peak runoff flow per acre of developed land. These apportioned flow rates are not based on whether or not the tailings contribute runoff under existing conditions, only on the available capacity and on the future area draining to each crossing. In consultation with the SCDWR, it was decided that modeling the existing runoff from the tailing areas was not appropriate and that the proposed upstream area should be used to determine the allowable future flow rates.
- Apportioning the capacity only to areas that currently produce runoff would greatly increase the allowable runoff rate in these areas, while preventing areas that include

tailings from discharging any storm runoff at all. The total allowable flow, however, would remain the same.

The County Department of Water Resources staff agreed with this method at the time of preparation of the 2003 and 2005 drainage master plans.

SCDWR2-5

The comment states that the 2003 and 2005 drainage studies do not address impacts from potential increases in runoff. The comment also specifies a 2006 study for inclusion in the DEIR.

The supplemental study, dated April 20, 2006, and entitled *Rio del Oro: North Offsite Channel Alternative Analysis*, was prepared to address an existing flooding condition on Sunrise Boulevard at the request of the County Department of Water Resources. The existing flooding problem at Sunrise Boulevard is primarily a peak-flow issue. The drainage facilities constructed with the Rio del Oro project would alleviate the peak-flow flooding of Sunrise Boulevard. The additional volume was also addressed by the supplemental study.

SCDWR2-6

The comment states that the 2003 and 2005 drainage studies do not discuss impacts and mitigation from increasing flows toward the central overchute.

The projected increase in peak flows to the central Folsom South Canal crossing resulted from using the existing capacity. The central Folsom South Canal crossing was not being used to its existing capacity. In consultation with the County Department of Water Resources, using the available capacity of each Folsom South Canal crossing was determined to be the most economical and best engineering solution for the regional drainage improvements. This increase was reflected in the *Morrison Creek Hydrologic/Hydraulic Analysis* (Wood Rodgers, May 28, 2004). A HEC-RAS model of the creek developed for this analysis assessed the capacity of the existing Morrison Creek and tributaries downstream (west of) the Folsom South Canal. This model used peak flows consistent with the *Rio del Oro Master Drainage Study*. County Department of Water Resources staff members concurred with this approach during the development of the 2003 and 2005 drainage master plans.

SCDWR2-7

The comment states that it is unclear from the exhibits and drainage study what improvements will be required through the wrecking yard.

The impacts of the Rio del Oro project to the central conveyance and the required improvements are addressed in the *Addendum to the Master Drainage Study, Rio del Oro* (Wood Rodgers, October 25, 2005, pages 2-3, Figure 3).

SCDWR2-8

The comment requests a breach analysis for all levees associated with the project.

No levees are proposed for the Rio del Oro project. A breach analysis pertains to levee systems and is not required for the project.

SCDWR2-9

The comment assumes that a separately funded preserve manager will aesthetically maintain the drainage corridors and that the Stormwater Utility will be responsible for other maintenance.

The City conducted several workshops on the drainage corridors/open space/trail system. The City subsequently identified that the aesthetic maintenance and habitat management would not be the responsibility of Stormwater Utility and would be funded and maintained by other agencies.

SCDWR2-10

The comment states that the finance plan should include a component for compensating miners downstream of the project.

The total volume of runoff entering the mining pits was estimated in the *Morrison Creek Hydrologic/Hydraulic Analysis* (May 2004/July 2004) and the *Technical Memorandum—Morrison Creek Mining Pit 100-Year Volume Analysis* (Wood Rodgers, January 12, 2006).

SCWA is responsible for funding regional drainage improvements. If the County Department of Water Resources determines that additional storage is required within the mining reach of Morrison Creek, then SCWA should fund these facilities through its Zone 11 fees. The *Rio del Oro Finance Plan* specifies that the Rio del Oro project will participate in the SCWA Zone 11 fee program.

SCDWR2-11

The comment states that a study should be prepared showing how the flows of developed areas will meet the downstream constraints and defining the parameters of a new pump station that will be required.

The drainage study and pump station parameters are engineering, design-level plans that would be completed before project implementation. However, they are not necessary for an analysis of environmental impacts associated with the specific plan, which is largely programmatic in nature.

The Folsom South Canal is the downstream drainage constraint. The drainage study prepared for the project identifies that the project will detain storm water runoff to less than predevelopment flows to meet the flow constraints of the Folsom South Canal. The channels downstream of the Folsom South Canal can pass the peak flows from the Folsom South Canal; therefore, there are no constraints downstream of the Folsom South Canal. The project has less peak runoff leaving the site than existing conditions; therefore, there are no downstream constraints.

The pump station proposed for the southwest corner of Phase 1 is addressed in the 2005 master drainage study. The pump station is discussed in the “Proposed Detention Basins” section on page 26 of the study. The operational description included in this study is of adequate detail for a specific plan. A design report, including further detail, will be provided at the time of construction.

SCDWR2-12

The comment states that size and design criteria for the water quality detention basins should be specified according to the Sacramento City/County Drainage Manual, Volume 2: Hydrology Standards.

The water quality basins identified in the master drainage study were designed according to the *Sacramento City/County Drainage Manual, Volume 2: Hydrology Standards* (December 1996). The final detailed design drawings will address this requirement.

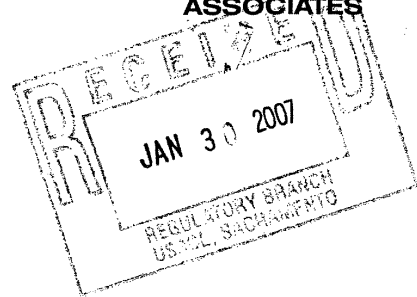
SCDWR2-13

The comment states that it is not allowed to release urban stormwater/runoff into creek systems before treatment pursuant to Finding No. 57 of the stormwater permit.

The proposed water quality basins were designed in the master drainage study according to the *Sacramento City/County Drainage Manual, Volume 2: Hydrology Standards* (December 1996). The final detailed design drawings will address this requirement. The Rio del Oro project will comply with the stormwater permit/regulations that are in effect at the time of construction.

SECTION D

Others



January 26, 2007

Ms. Anna Sutton
US Army, Corps of Engineers
1325 J Street
Sacramento, CA 95814-2922

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

Re: Response to Draft Environmental Impact Report, Rio del Oro Specific Plan near Tracy
Property at 3601 Grantline Road, Rancho Cordova, CA

Dear Ms. Sutton and Mr. Angell;

Ayres Associates (Consulting Engineers) acting at the request by the landowners at the referenced address are formally commenting on the referenced public document.

The question that the landowners have in regard to the site layout is; ***"How and where does the street labeled as "International Drive" eventually connect to Grantline Road"***. We were unable to find this within the documentation, however it appears to head straight eastward toward Grantline Road and could cross a portion of the Tracy property.

Ayres - 1

Thank you for your time in responding. This will greatly help the landowner in understanding of this project may effect their property.

Ayres Associates Inc

Thomas W. Smith, PE, GE
Manager – Sacramento Office
Water Resources/Geotechnical Engineer

cc. John J. Tracy and Kime Kim
3601 Grantline Road
Rancho Cordova, CA 95742

Ayres-1

The comment, made at the request of a landowner at 3601 Grant Line Road, asks how and where the street labeled as “International Drive” eventually connects to Grant Line Road.

Consistent with the City General Plan, the street labeled as International Drive is expected to ultimately connect to Grant Line Road, through the property east of the Rio del Oro Specific Plan area. However, it is likely that this connectivity would not occur until development of that parcel occurs. Therefore, although the specific plan accommodates ultimate connectivity to Grant Line Road, the roadway would not extend past the specific plan area as part of the Rio del Oro Specific Plan.

California Native Plant Society

February 1, 2007

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

FAX 916-361-1574

Anna Sutton
U.S. Army Corps of Engineers, Regulatory Branch
1325 J Street, Room 1480
Sacramento, CA 95814-2922

FAX 916-557-6877

RE: Rio del Oro Specific Plan DEIS

The California Native Plant Society (CNPS) is a statewide non-profit organization of some 10,000 scientists, educators, and laypeople dedicated to the conservation and understanding of the California native flora. As a science-based conservation organization, we believe that land use decisions must be accompanied by a thorough assessment of the environmental impacts as required by the state and federal Endangered Species Acts, the Clean Water Act, the National Environmental Policy Act, the California Environmental Quality Act, and other resource protection laws.

The Sacramento Valley Chapter of CNPS has been actively involved in the public review and comment process for land use decisions at all levels that affect vernal pool ecosystems in Sacramento County. Chapter volunteers participate in number of regional planning organizations. Volunteers serve on the South Sacramento Habitat Conservation Plan steering committee and biological subcommittee, are involved in a stakeholders group to determine land use planning for the former Mather Air Force Base and its vernal pool grassland ecosystem, and serve on various local land trust boards, steering committees, and management committees. Chapter volunteers have also testified at innumerable planning commission, board of supervisors and city council meetings on projects that impact vernal pool resources.

Besides being an active member and past president of the California Native Plant Society, I am an independent consultant with a specialty in vernal pool ecosystems. I am familiar with the vernal pools of Sacramento County, have conducted field research on and in the vicinity of the Rio del Oro Specific Plan area, and have prepared ecosystem management plans for preserved vernal pool landscapes nearby.

The following comments on the Rio del Oro Specific Plan DEIS are based on my knowledge of the wetland and endangered species resources in the vicinity of the proposed project and my informed layman's understanding of the resource protection laws and their associated public review process.



Dedicated to the preservation of California native flora

CNPS Rio del Oro DEIS Comments
February 1, 2007, Page 2 of 4

1. CNPS applauds the establishment of a 507 acre wetland preserve, but is concerned by the numerous flaws in the preserve design.
 - It is CNPS's position that creation of vernal pools within existing vernal pool landscapes causes direct, indirect and cumulative impacts to those naturally occurring vernal pool landscapes and the biota that depend up on them.

Creation of artificial vernal pools within an existing vernal pool landscape has the potential to disrupt or reduce the hydroperiod of the natural pools and may decrease their habitat value for aquatic-phase-dependent species such as listed crustaceans.

Creation of artificial vernal pools within an existing vernal pool landscape removes upland habitat for pollinators that are essential to vernal pool plant reproduction.

Creation of artificial vernal pools within an existing vernal pool landscape removes upland habitat for species that use the pools only during certain life stages such as western spadefoot toad.

Creation of artificial vernal pools within an existing vernal pool landscape removes habitat for upland-dependent native species of plants that were once more common in California's great central valley.
 - Bisecting the preserve with an extension of Jaeger Road will cause indirect and cumulative effects that are not fully disclosed in the DEIS and will severely compromise the long-term viability of this preserve. CNPS - 2
 - The preserve is isolated from other vernal pool grassland landscapes and therefore has an increased probability of losing species through stochastic events. CNPS - 3
 - The high *edge to area ratio* and the extension of Jaeger Road through the middle of the preserve increase the probability of indirect impacts over time and serve as sources for disturbance, non-native biota introduction, water pollution, predation by domestic pets, etc. CNPS - 4
2. Small preserves surrounded by incompatible land use require active and adaptive management and not just maintenance. The City of Rancho Cordova is not an acceptable entity to manage the wetland preserve. The preserve must to be managed by persons experienced in natural lands management, especially ecosystem-based adaptive management, and must consider preservation of the conservation values of the site as the top priority. CNPS - 5
3. The mitigation and monitoring plan does not discuss the ongoing need for vegetation management within the proposed preserve and does not provide guidance or parameters for how to accomplish vegetation or other ecological management. This is especially troubling since the City of Rancho Cordova is proposed to be the long-term owner and manager of the preserve. CNPS - 6

CNPS Rio del Oro DEIS Comments
February 1, 2007, Page 3 of 4

- | | |
|---|---------|
| <p>4. The success criteria for the created pools are totally arbitrary and unacceptable. To achieve no net loss of function and value, the pools must mimic the natural vernal pools being destroyed. The document fails to provide any data demonstrating that the success criteria will appropriately mimic the natural pools being destroyed. Additionally, no remediation measures have been included in the mitigation plan.</p> <ul style="list-style-type: none"> • Success criteria must be linked to comparison with a reference set of natural vernal pools existing in an undisturbed nearby landscape and should fall within the variation existing in those reference pools. Ponding depth and max/min hydroperiod, aerial coverage of vegetation, species richness, relative cover of vernal pool indicators, etc., must all fall within the range of the reference pools. Created pools falling outside the range of the normal pools should not be considered successful replacement for impacts to natural vernal pools. • There are no success criteria for ensuring that take of listed species has been fully mitigated. These must be established along with appropriate remediation measures. As with the other parameters, the success criteria must be based on concurrent data collected from naturally occurring reference pools. | CNPS-7 |
| <p>5. A five-year monitoring period is insufficient to determine whether or not the created pools will provide long-term compensation for the natural vernal pools proposed for destruction. Many vernal pool taxa, including the listed crustaceans, can be stimulated by disturbance (to hatch and crash unsuccessfully in less than ideal conditions) in habitat that is inadequate for their long-term survival. Unpublished studies have shown that <i>Branchinecta lynchi</i> in particular can have a relatively high abundance in marginal habitat following disturbance, but that their populations decline once the habitat has stabilized. The monitoring period for all created vernal pools must be a minimum of ten years to demonstrate that lost habitat functions and values have successfully been replaced by the created mitigation habitat.</p> | CNPS-8 |
| <p>6. Direct, indirect and cumulative impacts to the natural vernal pools that are being preserved also require monitoring, especially if the mitigation plan as proposed is actually permitted. This requires that all of the preserved pools be monitored for attributes discussed in #4 and #5 above and that their condition also be assessed against a set of natural vernal pools in a totally undisturbed nearby habitat.</p> | CNPS-9 |
| <p>7. The proposed project conflicts with the City of Rancho Cordova's General Plan related to protection and preservation of natural wetland resources including vernal pools and stream corridors.</p> | CNPS-10 |
| <p>8. CNPS contends that compliance with other regulatory requirements such as obtaining a Section 404 permit, Section 401 certification, or ESA incidental take statement is not in-and-of-itself mitigation, does not constitute a mitigation measure under NEPA or CEQA standards, and cannot be considered to in any way offset direct, indirect or cumulative impacts.</p> | CNPS-11 |
| <p>9. The cumulative impacts analysis is missing Cordova Hills. While there is not a specific proposal in the works, the project proponent is attempting to get the Sacramento County</p> | CNPS-12 |

CNPS Rio del Oro DEIS Comments
February 1, 2007, Page 4 of 4

Board of Supervisors to extend the Urban Policy Boundary to include this project. Additionally the project proponent has proposed to LAFCO a utility service extension to include this project. Regardless of site specific details, this Cordova Hills project is foreseeable and must be considered in the cumulative impacts analysis.

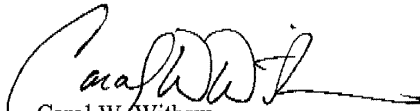
CNPS-12
cont.

From a more general perspective, CNPS is disappointed and frustrated that local, state and federal land use authorities continue to find it appropriate to proceed with projects that: 1) have significant and unavoidable impacts on the environment especially when less environmentally destructive alternatives exist, 2) routinely allow habitat creation as mitigation for loss of natural habitat despite the growing evidence in the scientific literature that clearly indicates that creation or restoration fails to replace the functions and values that exist in a natural habitat, and 3) do nothing to ensure that species and habitat are not only conserved, but also afforded the appropriate resources and management to ensure their long-term survival..

CNPS-13

CNPS thanks the City of Rancho Cordova and the U.S. Army Corps of Engineers for the opportunity to comment upon this DEIS for the Rio del Oro Specific Plan. We request that we continue to receive all notices related to this project and others within the City of Rancho Cordova or under jurisdiction of the USACE Sacramento District Office.

Sincerely,



Carol W. Witham
1141 37th Street
Sacramento, CA 95816

CNPS-1

The comment applauds the establishment of a 507-acre wetland preserve, but states a concern over “flaws” in the preserve design. The comment specifically states that creation of artificial vernal pools within an existing vernal pool landscape causes direct, indirect, and cumulative impacts on naturally occurring vernal pool landscapes and the biota that depend upon them; could disrupt or reduce the hydroperiod of the natural periods and may decrease their habitat value for aquatic-phase-dependent species (e.g., listed crustaceans); removes upland habitat for pollinators that are essential to vernal pool plant reproduction; removes upland habitat for species that use the pools only during certain life stages (e.g., western spadefoot toad); and removes habitat for upland-dependent native plant species.

See responses to comments USFWS-1, USFWS-2, USFWS-3, and USFWS-4 for discussions of impacts on the existing vernal pools within the proposed preserve.

CNPS-2

The comment states that indirect and cumulative effects of locating Jaeger Road (Rancho Cordova Parkway) in the proposed preserve have not been analyzed in the 2006 DEIR/DEIS.

The 2008 RDEIR/SDEIS acknowledges that constructing the road through the preserve could disrupt or eliminate hydrologic connectivity that is important to preserve vernal pools and the plant and wildlife species that inhabit the pools. However, a hydrologic modeling analysis conducted for the proposed preserve using ArcGIS software tools and a LIDAR-derived, fine-scale topographic model indicates that construction of Rancho Cordova Parkway and Americanos Boulevard would not jeopardize the hydrological integrity of vernal pools in the preserve because microwatersheds would be maintained. (2008 RDEIR/SDEIS, page 3.10-27.)

The comment does not specify what additional indirect or cumulative effects could result from the road’s location.

See responses to comments USFWS-1 and USFWS-10 for discussion of impacts on the proposed wetland preserve from Rancho Cordova Parkway and proposed mitigation measures.

CNPS-3

The comment states that the preserve is isolated from other vernal pool grassland landscapes and therefore has an increased probability of losing species through stochastic events.

The proposed preserve has been designed to provide connectivity to other grassland areas to the extent feasible. The majority of the Rio del Oro site, north of the proposed preserve, is dredger tailings, which contain wetlands that have been determined by USACE to be isolated with no connection to interstate and/or foreign commerce and are therefore not jurisdictional. Although these wetlands may provide habitat for vernal pool species, as identified by USFWS, they do not have a hydrologic connection to the proposed preserve or other downstream waters. Existing or approved roads, homes, and other infrastructure are located to the south of the proposed preserve, leaving no potential for connectivity to the south. As explained in the 2008 RDEIR/SDEIS, the proposed wetland preserve would connect to the agency-proposed conservation area identified in A

Conceptual-Level Strategy for Avoiding, Minimizing & Preserving Aquatic Resource Habitat in the Sunrise-Douglas Community Plan Area (June 2004) immediately east of the project site, just north of the proposed North Douglas Road. (2008 RDEIR/SDEIS, page 3.10-26.) USFWS conservation goals in the vernal pool recovery plan favor preservation within the Mather Core Area, and the proposed preserve has been located in the portion of the project site best suited for preservation and creation of vernal pool habitat.

CNPS-4

The comment states that the high edge-to-area ratio and the extension of Jaeger Road (Rancho Cordova Parkway) would increase indirect impacts on the proposed preserve and serve as sources for disturbance, nonnative biota introduction, water pollution, predation by domestic pets, etc.

The 2008 RDEIR/SDEIS acknowledges the potential for indirect impacts associated with locating Rancho Cordova Parkway through the proposed preserve. (2008 RDEIR/SDEIS, page 3.10-27.) See response to comments USFWS-1 and USFWS-10 for a discussion of design elements of the road that would minimize impacts to the extent practicable, and limitations on locating the road elsewhere.

At approximately 507 acres, the proposed preserve would be one of the largest in the region. Agency policies favoring on-site preservation as well as the existing and approved development surrounding the site limit the ability of the project to improve the edge-to-area ratio. See responses to comments USFWS-1, USFWS-2, USFWS-3, USFWS-4, and USFWS-5 for further discussion of design considerations and mitigation measures that would protect the biological functions of the vernal pool habitat within the preserve.

CNPS-5

The comment states that the preserve must be managed by persons experienced in natural lands management, not the City of Rancho Cordova. The comment also states that the preserve will require active and adaptive management, not just maintenance.

The 2008 RDEIR/SDEIS explains that the project applicant(s) would need to implement an MMP approved by USACE, the Central Valley RWQCB, and the City. (2008 RDEIR/SDEIS, page 3.10-28.) Any MMP would also require approval by USFWS as part of the Section 7 consultation process. Mitigation Measure 3.10-1a provides additional information on the details of the required MMP. A revised draft MMP was completed in June 2009 and specifies that responsibility for long-term maintenance of the preserve would be assumed by a conservation-oriented third party such as the Sacramento Valley Open Space Conservancy or the Wildlife Heritage Foundation. The O&M plan will describe long-term methods, including compensatory mitigation, conservation easements, funding and management details of the proposed preserve.

The 2006 DEIR/DEIS reported that once the MMP is implemented, long-term ownership of the proposed wetland preserve may be assumed by the City. (2006 DEIR/DEIS, pages 3.10-35 and 3.10-36.) Preserve *management*, however, would be conducted by a USACE-approved conservation-oriented organization in accordance with a USACE-approved conservation easement and O&M plan.

The comment is noted.

CNPS-6

The comment states that the mitigation and monitoring plan does not discuss the ongoing need for vegetation management within the proposed preserve or provide guidance or parameters for how to accomplish vegetation or other ecological management.

The wetland MMP presented in Appendix C of the 2006 DEIR/DEIS was a draft; a revised version of the draft plan was presented in the 2008 RDEIR/SDEIS (see Appendix Q). The MMP was updated in June 2009 and is attached to this FEIR/FEIS. The 2009 draft MMP and Mitigation Measure 3.10-1a (2008 RDEIR/SDEIS, page 3.10-40 through 3.10-43) specify that vegetation monitoring will be conducted periodically for the first 10 years after vernal pool construction or until success criteria have been met, whichever is longer. The 2009 draft MMP proposes success criteria for vegetation and the MMP and Mitigation Measure 3.10-1a specify that corrective measures must be implemented if success criteria are not being met. The revised draft MMP prepared in 2009 states that the City, Sacramento Valley Open Space Conservancy, the Wildlife Heritage Foundation, or other third-party organization could become the long-term *owner* of the proposed preserve; however, *management* of the preserve would be provided by a conservation-oriented organization approved by USACE.

The final wetland MMP will be subject to approval by USACE, the Central Valley RWQCB, the City, and USFWS. The plan is intended to describe the mitigation of impacts on certain jurisdictional features and the monitoring of those constructed or restored habitats. Actual vegetation management will be discussed in the long-term management plan, which will be prepared under separate cover. Vegetation management would include such tasks as thatch management, grazing management, control of invasive weeds, and the establishment of native vegetation.

CNPS-7

The comment calls the success criteria for the created vernal pools “totally arbitrary and unacceptable” and states that the EIS/EIR fails to provide data demonstrating that the success criteria will appropriately mimic the natural pools being destroyed. The comment also states that no remediation measures have been included in the mitigation plan.

The proposed draft wetland MMP was revised in 2009 and this draft is attached as revised Appendix Q to this FEIR/FEIS. The 2009 draft MMP proposes that constructed vernal pools and their nearest neighbor pools must meet the success criteria listed in Table 3 at the end of the 10-year monitoring period, and after 3 years of no human intervention. Table 3 from Appendix Q is reproduced below.

Table 3. Success Criteria for Compensatory Vernal Pools

Category	Criteria
Hydrology	Depth and duration of ponded water in constructed and neighbor pools should be within the range exhibited by reference pools.
Vegetation	(1) Absolute and relative cover of each vernal pool endemic ¹ in constructed and neighbor pools should be within the range exhibited by reference pools. (2) The number of vernal pool endemics in constructed and neighbor pools should be within the range exhibited by reference pools. (3) The number and cover of nonnative species in constructed and neighbor pools should be within the range exhibited in reference pools.
¹ As defined in the California Department of Fish and Game’s list: <i>Catalog of Plant-Species Known to be Associated with Vernal Pools</i> (DFG 1998) or other species that are not listed, but are recognized by vernal pool biologists to be associated with vernal pools.	

The comment also states that there are no success criteria for ensuring that the take of listed species has been fully mitigated.

The 2009 draft MMP proposes vernal pool branchiopod surveys be conducted in years 1, 2, 3, 5, 7, and 10 of the monitoring period. Surveys would be conducted of the constructed, nearest neighbor, and reference pools and would include two sampling visits per year, one early in the rainy season and one later in the rainy season. The surveys would be conducted according to USFWS guidelines, but would not follow the 2-week sampling protocol.

In addition to these measures, it is anticipated that the USFWS final biological opinion will include terms and conditions that implement reasonable and prudent measures to minimize the risk of take of listed species.

CNPS-8

The comment states that a 5-year monitoring period is insufficient for determining the success of created vernal pool habitat, and that a 10-year monitoring program is the minimum monitoring period necessary.

USACE and USFWS will evaluate the necessary duration of monitoring through the CWA Section 404 permitting process and the Section 7 consultation process. The revised draft MMP prepared in 2009 proposes monitoring for 10 years and Mitigation Measure 3.10-1a stipulates that “mitigation monitoring will continue for a minimum of 10 years from completion of compensatory mitigation, or human intervention (including recontouring and grading), or until the performance standards identified in the approved MMP have been met, whichever is longer.

The monitoring period would begin with the first rainy season following the construction activities. Monitoring would be extended beyond the 10-year period only for those wetlands that are not meeting success criteria.

CNPS-9

The comment states that direct, indirect, and cumulative impacts on natural vernal pools that are being preserved also require monitoring.

The meaning of the comment is unclear. All vernal pools created as compensatory mitigation for direct, indirect, and cumulative impacts would be subject to the same mitigation and monitoring requirements. Under the 2009 draft MMP, previously existing vernal pools found within the same watersheds as constructed vernal pools (i.e., nearest neighbor pools) would undergo the same monitoring requirements.

CNPS-10

The comment states that the proposed project conflicts with the City General Plan related to protection and preservation of natural wetland resources.

The comment does not explain any perceived inconsistency with the City General Plan. The 2006 DEIR/DEIS states that implementing the Rio del Oro project could conflict with the Natural Resources Element of the City General Plan, although the ultimate decision on consistency lies with the City Council. (2006 DEIR/DEIS, page 3.10-26.)

Rio del Oro project design provides protection of a majority of the highest quality wetland habitat on the site and provides connectivity to general plan–designated Natural Resources areas east of the site along Morrison Creek and new open space corridors associated with project drainage channels (see analysis associated with Policy NR.1.1 and NR.1.8).

Consistency with the City General Plan is discussed further on pages 3.10-36 and 3.10-37 and Appendix P of the 2008 RDEIR/SDEIS.

CNPS-11

The comment states the commenter’s opinion that compliance with other regulatory requirements such as obtaining a Section 404 permit, Section 401 certification, or ESA incidental take statement is not in and of itself mitigation under NEPA or CEQA.

The comment is noted. 2008 RDEIR/SDEIS Mitigation Measure 3.10-1a requires the project applicant(s) to obtain a permit for fill of waters of the United States and waters of the state before conducting any groundbreaking activity. The mitigation measure establishes performance criteria and monitoring criteria that assure, to the degree feasible, that impacts on wetlands and species would be mitigated to the degree feasible. For example, Mitigation Measure 3.10-1a requires the project applicant(s) to commit to replace, restore, or enhance the acreage of all wetlands and other waters of the United States subject to USACE jurisdiction, and of all waters of the state subject to Central Valley RWQCB jurisdiction and the City General Plan, that would be removed, lost, and/or degraded with project implementation. The acreage must be replaced, restored, or enhanced on a “no net loss” basis in accordance with the requirements of USACE, the Central Valley RWQCB, and the Natural Resources Element of the City General Plan. Thus, no impacts on aquatic resources could occur until specific mitigation is in place. USACE and USFWS would retain authority to review the efficacy of mitigation measures and prescribe remedial measures through the permit process, if necessary.

CNPS-12

The comment states that the cumulative impacts analysis should include the foreseeable Cordova Hills project.

The proposed Cordova Hills project was added to the cumulative impact analysis in the 2008 RDEIR/SDEIS.

CNPS-13

The comment expresses disappointment and frustration about permitting of projects that have significant and unavoidable impacts, that allow habitat creation as mitigation for loss of natural habitat, and that do not ensure that species and habitat are afforded the appropriate resources and management to ensure their long-term survival.

The comment notes the commenter’s frustration with federal, state, and local land use authorities’ permitting of projects. The comment is noted.

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February 5, 2007

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Anna Sutton
United States Army Corps of Engineers
1325 J Street, Room 1480
Sacramento, CA 95814-2922

Re: Draft Environmental Impact Report/Environmental
Impact Statement for Proposed Rio Del Oro Specific Plan

Dear Mr. Angell and Ms. Sutton:

On behalf of Elliott Homes, Inc., and GenCorp Realty Investments (“GenCorp”), please accept the comments set forth below with respect to the above-referenced document. In general, we applaud both the City of Rancho Cordova (“City”) and the United States Army Corps of Engineers for a fine work product, which comprehensively analyzes the environmental impacts that would result from the proposed Rio Del Oro Specific Plan (“the Project”), and identifies numerous mitigation measures addressing those impacts. Although compliance with these measures will require expenditures of literally millions of dollars by both Elliott Homes and GenCorp, we recognize that such expenditures are unavoidable under the law, and that the measures will have the desirable result of reducing the impacts of the Project. Nevertheless, we have identified a handful of problematic measures that we would like the lead agencies to reconsider. As these few measures pertain primarily to matters involving the City’s land use planning obligations, we direct our concerns primarily to the City.

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Page 2

We also provide specific comments that correct or update information in the DEIR/EIS.

Mitigation Measure 3.14-3a

Mitigation Measure 3.14-3a is intended to mitigate effects associated with “Increased Demand for Alternative Modes of Transportation.” (DEIR/EIS, p. 3.14-76.) The measure reads as follows:

The project applicant(s) for all project phases shall participate in capital improvements for transit service. The project’s fair-share participation and the associated timing of the improvements shall be identified in the project conditions of approval and/or the project’s development agreement. Improvements shall be coordinated, as necessary, with Sacramento RT.

Elliott Homes and GenCorp do not dispute the notion that, to the extent that new vehicle trips associated with the Project will generate significant traffic impacts that must be mitigated to the extent feasible, improved or expanded transit service should play a role in mitigating such impacts. As currently written, however, Mitigation Measure 3.14-3a provides no information by which Elliott or GenCorp can calculate and plan for the financial obligations associated with the unspecified “fair-share participation” in the costs of unspecified capital improvements. As is well known, the fee burdens associated with developing property in Rancho Cordova are very high already, in the neighborhood of \$85,000 per new home. This enormous cost per-unit must be added to the costs of land, labor, and materials associated with home construction, with the result that home purchasers in the City will be faced with housing costs that are very high by historical standards, even in California. At the same time, developers such as Elliott and GenCorp face great challenges in trying to fashion financially viable projects while at the same time bearing the enormous financial burdens associated with improving land. In recent years, these burdens include not only the need to fund infrastructure construction, but also the need to do such things as purchase and preserve off-site habitat areas for species such as the Swainson’s hawk and vernal pool fairy shrimp. While they are bearing such financial burdens, developers are also asked to provide housing affordable to households of very limited means.

In light of these financial considerations and challenges, Elliott and GenCorp respectfully submit that the open-endedness of Measure 3.14-3a as currently drafted makes the measure financially infeasible from the applicants’ standpoint. We

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therefore urge the City, as it prepares the Final EIR/EIS, finalizes the Public Facilities Financing Plan, and works with the applicants to draft a Development Agreement for the Project, to identify specific transit capital improvements that must be funded, and to quantify precisely the “fair-share” contributions required of the applicants. It may be that, given the financial burden already created by existing fee programs and other mitigation measures set forth in the Draft EIR/EIS, the City and Regional Transit will have to prioritize the kinds of improvements needed to get the most bang for the buck to facilitate transit usage.

RTMM-1
cont.

Mitigation Measure 3.14-6

Mitigation Measure 3.14-6 is intended to mitigate “Potential Impacts Associated with the City’s Transportation Impact Fee Program.” (DEIR/EIS, p. 3 14-78.) The measure reads as follows:

The project applicant(s) for all project phases shall provide fair-share contributions to the City’s transportation impact fee program to aid in bridging the program’s funding shortfall. However, ultimate funding of the improvements cannot be guaranteed (as it would require funding from other developments in the area).

As noted above, Elliott Homes and GenCorp recognize the need for implementation of feasible mitigation measures to address transportation-related impacts, but are very concerned about mitigation measures, such as Measure 3.14-6, that are so open-ended as to create uncertainty as to whether the Project can feasibly internalize the eventual costs, once they are finally determined. In light of these considerations, Elliott Homes and GenCorp respectfully submit that Measure 3.14-6 as currently drafted is financially infeasible from the applicants’ standpoint. We therefore urge the City, as it prepares the Final EIR/EIS, finalizes the Public Facilities Financing Plan, and works with the applicants to draft a Development Agreement for the Project, to quantify precisely the “fair-share” contributions required of the applicants. We are aware that the City is currently engaged in the process of updating its Traffic Impact Fee program to include numerous improvements not currently funded through that program. We are also aware of larger discussions by which the City is working with sister agencies such as Folsom, Sacramento and El Dorado Counties, and Caltrans to identify regional improvements that will improve present and future mobility in eastern Sacramento County and western El Dorado County. To the extent that both of these efforts result in more certainty regarding (i) what transportation improvements will be funded through City-imposed development fees, (ii) what developing areas

RTMM-2

outside the City will participate in funding such improvements, and (iii) how much money from the State of California will be available, the City may be able either to eliminate Measure 3.14-6 as unneeded or to modify the measure to quantify the amounts of money that each new housing unit or each new square foot of commercial and industrial development must pay. As with the transit improvements contemplated by Measure 3.14-3a, however, the City and its sister agencies may have to set priorities regarding which improvements will bring the greatest benefits. We also respectfully suggest that, in making such judgments, the City should reconsider whether to continue to pursue, through development fees, other items on its City-wide "wish list" that we regard as less essential than properly sized roads (e.g., recreational facilities such as water parks or other optional amenities that have traditionally been operated on a for-profit basis by entrepreneurs serving interested customers rather than funded by mandatory fees imposed on all new residents and businesses).

RTMM-2
cont.

Furthermore, we question whether the mitigation measure has the required "nexus" and "rough proportionality" to the impacts it is intended to mitigate. (See Cal. Code Regs., tit. 14, div. 6, ch. 3 ("CEQA Guidelines"), § 15126.4, subd. (a)(4), citing *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987), *Dolan v. City of Tigard*, 512 U.S. 374 (1994), and *Ehrlich v. City of Culver City* (1996) 12 Cal.4th 854.) The various other transportation mitigation measures require Elliott and GenCorp to mitigate the impacts of the project, either through specific improvements or through fair-share contributions. We have seen no evidence that the project will further exacerbate the funding shortfall.

Mitigation Measure 3.15-1

Mitigation Measure 3.15-1 is intended to mitigate "Construction-Related Air Pollutant Emissions." (DEIR/EIS, p. 3.15-22.) The portions of the measure of concern to Elliott and GenCorp read as follows:

Phase 1 of all action alternatives for Rio del Oro would result in construction-generated emissions that exceed the SMAQMD threshold of significance, even after implementation of the SMAQMD "standard construction mitigation." Therefore, the project applicant(s) shall pay SMAQMD an off-site mitigation fee for implementation of any of these alternatives for the purpose of reducing impacts to a less-than-significant level. The specific fee amounts shall be calculated when the construction emissions can be more accurately determined. This calculation would occur when an alternative has been selected, the project has been approved, and the Phase 1 improvement plans have been prepared.

RTMM-3

Calculation of fees associated with future, subsequent project phases shall be conducted before the approval of grading plans. It is estimated, based on information available at this time, that the off-site construction mitigation fees would range from \$4,404,845 to \$5,461,587 for development Phase 1, depending on which alternative is selected.

The project applicant(s) for all project phases shall pay into SMAQMD's off-site construction mitigation fund to further mitigate construction-generated emissions of NOx that exceed SMAQMD's daily emissions threshold of 85 lb/day. The calculation of daily NOx emissions is based on the current cost of \$14,300 to reduce 1 ton of NOx. The determination of the final mitigation fee shall be conducted in coordination with SMAQMD before any demolition or ground disturbance occurs for any project phase.

Elliott and GenCorp have several concerns about this measure. First, the proposed fee is very high not only in absolute terms but also in light of the *temporary* nature of the impacts at issue. This cost – currently estimated at as much as \$5.46 million for Phase 1 alone – will be borne ultimately by home buyers and businesses that will already be bearing very high fees from existing fee programs, some of which are currently under review, creating the possibility that some existing fees may be increased. To the extent that home buyers may pay off their share of this fee through their mortgages, these families may be paying for 30 years the costs of mitigating temporary impacts that dissipated long before they even moved into their homes.

Second, so far as we know, the Sacramento Metropolitan Air Quality Management District (“SMAQMD”) has no statutory authority to impose a fee on new development in order to mitigate construction-related emissions. Thus, although SMAQMD, in its role as an agency that comments on environmental documents for land use plans, may be urging the City to impose such a fee, the final decision whether to do so must rest with the City itself. This division of labor requires the City to satisfy itself that the fee is both reasonable and fair. We have our doubts.

Our third point, closely related to the second, is that we have seen no information supporting such high numbers or any analysis demonstrating the existence of a “nexus” between the impact at issue and the fee that would be required by the measure. Nor have we seen information showing that the amount being sought is “roughly proportional” to the extent of the impacts associated with the Project. (See CEQA Guidelines § 15126.4, subd. (a)(4), citing *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987), *Dolan v. City of Tigard*, 512 U.S. 374 (1994), and *Ehrlich v. City of Culver City* (1996) 12 Cal.4th 854.) If the City does choose to

RTMM-3
cont.

RTMM-4

RTMM-5

impose this fee, the City should obtain and analyze the facts needed to show both (i) that the money to be spent by SMAQMD will actually reduce impacts of the kind ostensibly being mitigated (i.e., temporary construction-related impacts) and (ii) that the level of mitigation achieved for the amounts of money imposed is truly proportional to the level of impact created by the Project.

RTMM-5
cont.

Fourth and finally, the fee at issue, despite the current estimates, is just as open-ended as those discussed previously, and is problematic for that reason as well.

RTMM-6

For all of these reasons, Elliott and GenCorp respectfully submit that Measure 3.15-1 as currently drafted is financially infeasible from the applicants' standpoint.

RTMM-7

Updates and Clarifications to Biological Resources Chapter

Page 3.10-1

Other appropriate references to biological resource surveys include:

- Late Season Special-Status Plan Survey for Rio del Oro, Sacramento County, California. (ECORP Consulting, Inc., 2006.)
- Results of surveys for special-status wildlife species at the Aerojet Property, Sacramento County, California. (Miriam Green Associates, 1999.)
- Special-Status Species Determination, Aerojet Property, Sacramento County, California. (Sugnet and Associates, 1995.)

RTMM-8

Exhibit 3.10-1 and page 3.10-5 (Elderberry Savanna)

Elderberry savanna is identified as a vegetation community type present on the site. As described by Holland (1986), elderberry savanna is an open, winter deciduous shrub savanna dominated by *Sambucus mexicana*, usually with an understory of introduced annual grasses and forbs. Based on the results of the Gibson and Skordal (2000) elderberry survey, there are approximately three elderberry shrubs dispersed between the two polygons (16.5 acres) labeled as elderberry savanna in Exhibit 3.10-1. Although the overall project site contains numerous elderberry shrubs, these areas should not be considered elderberry savanna.

RTMM-9

Table 3.10-1, page 3.10-8 and -9

Northern California black walnut is identified as "known to occur" on-site. The text goes on to state, however, that the walnut trees identified on site were likely to be hybrids between *Juglans hindii* and *J. regia*. On page 3.10-12, the Draft EIR/EIS

RTMM-10

states that “[a]lthough there are accounts of this species at the project site, native Northern California black walnut is believed to be extirpated from Sacramento County (CNPS 2001), and any specimens that have been identified may be hybrids between Northern California black walnut and other walnut species, such as English walnut (*Juglans regia*), Eastern black walnut (*Juglans nigra*), or Arizona walnut (*Juglans major*) (Kirk 2003, CNPS 1978). Specimens observed on the project site do not appear to be the species *Juglans hindsii* because they are branched from the base giving the trees a shrub-like appearance. *Juglans hindsii* does not typically form branches less than 9 feet above ground level (CNPS 1978).”

RTMM-10 cont.

Hybrid walnuts are not considered to be special-status species. According to CNPS’s (2001) Inventory of Rare and Endangered Plants, only two or three native stands are still extant and the species is believed to have been extirpated from Sacramento County (CNPS 2001). Based on the information provided on page 3.10-12 of the Draft EIR/EIS, native Northern California black walnut appears unlikely to occur on site. Therefore, the “Potential for Occurrence” column on Table 3.10-1 may warrant revision from “known to occur” to “unlikely to occur.”

Also, the results of the 2006 late season special-status surveys (ECORP 2006) should be cited, where appropriate (e.g., slender and Sacramento Orcutt grass).

RTMM-11

Table 3.10-2 and page 3.10-13

Cooper’s hawk (*Accipiter cooperii*) is identified as “likely to occur September to April but not expected to nest on-site.” This species has been previously observed on-site (Sugnet and Associates 1995, Miriam Green Associates 1999, a. Ballard pers. Obs.) and has potential to nest on-site. Breeding generally occurs in the Sierra Nevada and Coast Range, but in recent years has expanded to include the Sacramento Valley. The California Natural Diversity Data Base contains nesting records (confirmed and potential) in the vicinity of the project, including along White Rock Road adjacent to the northern boundary of Rio del Oro, at Goethe Park, and at Mississippi Bar (CDFG 2006). The text in Table 3.10-2 should be revised to state “Known to occur on-site, suitable nesting and foraging habitat present.”

RTMM-12

Tricolored blackbird (*Agelaius tricolor*) is identified as “Likely to occur year-round; suitable habitat present on-site.” On page 3.10-13, the Draft EIR/EIS states that “[a]lthough tricolored blackbird is known to nest in this region of Sacramento County, no suitable nesting habitat is present on the project site for this species. . .” The text in Table 3.10-2 should be revised to state “Likely to occur year round; suitable foraging habitat present; however, unlikely to nest as no suitable nesting habitat is present.”

Norther harrier (*Circus cyaneus*) has been previously observed on-site (Sugnet and Associates 1995, Miriam Green Associates 1999, A. Ballard pers. obs.) The text in Table 3.10-2 should be revised to state “Known to occur on-site; suitable nesting and foraging habitat present on-site.”

RTMM-12 cont.

Western spadefoot toad (*Scaphiopus hammondi*) has been observed on-site during surveys conducted by Miriam Green Associates (1999). The text in Table 3.10-2 should be revised to state “Known to occur on-site; suitable habitat present on-site.”

Page 3.10-11

In addition to the protocol-level special-status plant surveys conducted in 2003, late season special-status plant surveys were conducted by ECORP in 2006. No special-status plants were observed on-site during the 2006 surveys. This information should be incorporated into the discussion.

RTMM-13

The U.S. Fish and Wildlife Service’s *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants* is referenced in the text but is not cited in the References section. A citation to this document should be added to the References section.

RTMM-14

Page 3.10-12

Sugnet and Associates conducted vernal pool branchiopod surveys throughout the site in 1994, including portions of the site not surveyed by Gibson and Skordal (2000, 2001). Vernal pool fairy shrimp (*Branchinecta lynchi*) and vernal pool tadpole shrimp (*Lepidurus packardii*) were found to occur in many of the on-site wetlands. The results of these surveys should be incorporated into this section, as they provide information regarding the distribution of listed vernal pool branchiopods in portions of the site not surveyed by Gibson and Skordal (2000, 2001).

RTMM-15

California linderiella (*Linderiella occidentalis*) is identified as a federal species of concern. The Sacramento office of the U.S. Fish and Wildlife Service no longer maintains a species of concern list. We recommend removing the designation of “federal species of concern” throughout the document.

RTMM-16

Also, please add a reference to the 2006 late season special-status plant surveys conducted on-site by ECORP.

RTMM-17

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Page 3.10-14

The Draft EIR/EIS states that the U.S. Army Corps of Engineers verified the wetland delineation conducted by ECORP in September 2004. The U.S. Army Corps of Engineers verified the Rio del Oro wetland delineation (Regulatory Branch No. 199900590) prepared by ECORP on January 10, 2005.

RTMM-18

Page 3.10-22, Impact 3.10-1

A mapping error that included *indirect* impacts to vernal pools in *direct* impacts calculations also resulted in direct impacts being overstated by approximately 2.20 acres. Direct impacts to vernal pool habitat total 15 072.

RTMM-19

Page 3.10-32 to -34, Impact 3.10-2

As discussed above, references to “elderberry savanna” should be deleted.

RTMM-20

In the discussion of Riparian Habitat, the Draft EIR/EIS refers to a “majority of riparian habitat.” Please quantify what is meant by the term “majority,” i.e., what proportion of “riparian” habitat has reached senescence. Based on current site conditions, what proportion of the “riparian” habitat is associated with wetlands or other waters of the U.S.?

RTMM-21

Similarly, please quantify what is meant by “small areas . . .”, “. . . most of the riparian . . .”, “. . . lacking from most of the riparian habitat areas . . .”, and “Thus, impacts on a majority of this habitat . . .” Quantifying these descriptors would allow the reader to better assess the extent and significance of the project-related impacts to these communities.

Page 3.10-35

The elderberry mitigation plan is being developed through consultation with the U.S. Fish and Wildlife Service and will be “approved” by that agency through the Corps’ section 7 consultation.

RTMM-22

Page 3.10-48

The Draft EIR/EIS states that the impact would be significant and unavoidable because of the impacts to “3,300 acres of potential habitat for special-status wildlife.” This statement suggests that *all* of the land within the proposed impact area is habitat for special-status species, which is certainly not the case. For example, much of the acreage is dredger tailing piles, which is not habitat for special-status species. This statement should be revised to more accurately reflect the potential acreages of special-status species’ habitat that could be impacted by the project. A similar statement is also made on page 3.10-49.

RTMM-23

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We would also like to note a change in the proposed project – designed to offset impacts to vernal pool habitat – that merits discussion in the EIR/EIS. The applicants have purchased and are proposing to preserve and protect a 160-acre parcel in Sacramento County to offset unavoidable impacts to vernal pool habitat. The property, located northwest of the intersection of Florin Road and Eaglesnest Road is adjacent to existing conservation lands and contains approximately 22 acres of wetlands and waters of the U.S., including vernal pools.

RTMM-24

Conclusion

In our experience, it is the very nature of comments on environmental documents that they focus on the negative rather than the positive. This letter, of course, is no different. Still, our misgivings about a handful of mitigation measures and clarifications regarding impacts to biological resources in a document that looks to be over a thousand pages long should not obscure the fact that the Draft EIR/EIS is an extremely impressive document. We believe that it is legally adequate in the manner in which it addresses all categories of impacts. Its primary flaw, from our perspective, is that, in a handful of instances, the authors of mitigation measures got a little carried away. We are hopeful, however, that the City can address and resolve the issues addressed in detail above. The process of fashioning more practical mitigation measures and clarifying the biological issues listed above will not undermine the legal adequacy of the EIR/EIS under both the California Environmental Quality Act and the National Environmental Policy Act.

Sincerely,



James G. Moose

Cc: Paul Junker
William Campbell
Pam Johns
Cyrus Abhar
Adam Lindgren
Russ Davis
David Hatch
Timothy Taron
George Phillips

RTMM-1

The comment, made on behalf of Elliott Homes and GenCorp, states that the project applicant(s) believe that Mitigation Measure 3.14-3a, “Participate in Capital Improvements for Transit Service,” is sufficiently open-ended to make it financially infeasible from the standpoint of the project applicant(s). The comment urges the City to identify specific transit capital improvements that must be funded as it prepares the FEIR/FEIS, finalizes the public facilities financing plan, and works with the project applicant(s) to draft a development agreement, and to quantify precisely the “fair-share” contributions required of the project applicant(s).

As shown in Chapter 5 of this FEIR/FEIS, Mitigation Measure 3.14-3a of 2006 DEIR/DEIS page 3.14-76 is hereby revised as follows:

Mitigation Measure 3.14-3a: Participate in Capital Improvements for Transit Service. The project applicant(s) for all project phases shall participate in capital improvements for transit service providing transit-related services through annexation to the City’s Transit-Related Services Special Tax Area and payment of the tax. Capital improvements for transit services will be part of the City’s Transportation CIP and will include the construction and operation of the streetcar system, purchase of a shuttle fleet and construction of a maintenance facility. The project’s fair-share participation and the associated timing of the improvements shall be identified in the project conditions of approval and/or the project’s development agreement. Improvements shall be coordinated, as necessary, with Sacramento RT, for those facilities shall be satisfied through payment of the transportation fee. Capital improvement costs for on-site ancillary facilities are not in the City Transportation CIP. To fulfill the need for on-site facilities, the developer shall provide on-site transfer and connection facilities at appropriate locations as part of site development plans. Transfer facilities shall be provided at major arterial intersections. All transfer, fare collection and information facilities shall be provided at land uses that are major transit transfer points or destinations. These sites include major commercial and recreational land uses.

RTMM-2

The comment, made on behalf of Elliott Homes and GenCorp, states that Mitigation Measure 3.14-6, “Pay Fair-Share Cost of Identified Improvements that Are Not Fully Funded by the City’s Fee Program,” is financially infeasible from the standpoint of the project applicant(s) because it is so open-ended. The comment urges the City to quantify precisely the “fair-share” contributions required of the project applicant(s) and to reconsider whether to continue to pursue, through development fees, other items on its Citywide “wish list” that the project applicant(s) regard as less essential than properly sized roads. The comment also questions whether the mitigation measure has the required “nexus” and “rough proportionality” to the impacts it is intended to mitigate.

The commenter is referred to revisions made to this mitigation measure provided in Chapter 1 (Table 1-1) of this FEIR/FEIS, requiring the determination of project contributions to roadway improvements to be provided in the project’s public facility financing plan associated with Tier 2 entitlements.

RTMM-3

The comment, made on behalf of Elliott Homes and GenCorp, states that the SMAQMD off-site construction mitigation fee included in Mitigation Measure 3.15-1, “Implement Mitigation Measures to Control Construction-Generated Air Pollutant Emissions,” is too high (currently \$14,300 per 1 ton of oxides of nitrogen [NO_x] reduced) in absolute terms and in light of the temporary nature of the impacts at issue.

The fee is reasonably related to the size of the projects and its impacts, and does not result in an unacceptably high cost. In the case of construction of development Phase 1, assuming that the upper boundary for the possible mitigation fee is calculated at the 2006 rate, and that 100% of the cost is passed on to home buyers rather than affecting the developer’s overall profit margin, this would result in approximately \$1,850 per home above the selling price. This additional amount would be less than 1% of the home’s value, and would not likely dissuade a potential home buyer from purchasing the home. No economic infeasibility can be demonstrated by this or any similar example.

RTMM-4

The comment, made on behalf of Elliott Homes and GenCorp, suggests that SMAQMD does not have statutory authority to impose a fee on new development in order to mitigate construction emissions.

The California Air Resources Board (ARB) is charged with implementing the federal and California Clean Air Acts. ARB oversees air quality management districts, which are responsible for implementing the federal and state acts on a local and regional scale. The goal of both ARB and the districts is to ensure that their respective regions attain the air quality standards established by the federal and California Clean Air Acts. SMAQMD is the local agency in Sacramento County responsible for compliance with air quality regulations. Section 40961 of the California Health and Safety Code directs SMAQMD and other air quality management districts to review decisions by public agencies that may have an adverse impact on air quality, which includes proposed development projects, and to influence those decisions to mitigate or avoid air quality impacts. SMAQMD carries out this responsibility, in part, by reviewing and commenting on the CEQA analysis of project impacts and by suggesting feasible mitigation measures that may decrease those impacts to the greatest extent possible. SMAQMD has also developed a program for use by lead agencies to offset air emission impacts that cannot be fully reduced to less-than-significant levels or avoided. This program uses fees collected from development projects to finance the retrofitting or purchase of lower-polluting equipment or vehicles.

RTMM-5

The comment, made on behalf of Elliott Homes and GenCorp, suggests that there is neither any evidence of a nexus between the impact at issue and the fee that would be required by Mitigation Measure 3.15-1 nor any information showing the “rough proportionality” of the fee amount to the extent of the project impacts.

According to SMAQMD, project-generated construction-related emissions are considered to have a significant adverse air quality impact if they cannot be reduced to levels below SMAQMD’s threshold of significance (85 pounds per day for NO_x) through application of on-site construction mitigation. These remaining impacts can be mitigated, however, if the project applicant pays a fee that is used to purchase off-site construction mitigation. SMAQMD uses the fee to purchase off-site emissions reductions through its Heavy Duty Incentive Program. Under that program, owners of heavy-duty equipment in Sacramento County receive funds to offset the cost of repowering or retrofitting their old engines with cleaner engines or technologies. Real, quantifiable emission reductions occur throughout the Sacramento region as a result of this program.

Under this approach, the agency approving the project calculates the off-site mitigation fee and includes it, if applicable, in the environmental document, conditions of project approval, and MMRP. SMAQMD has developed a spreadsheet for fee calculation that is available for use by agencies or the public. The fee calculation takes into account the excess construction emissions, the number of days those emissions are emitted, and the cost to reduce emissions. For examples of projects funded through SMAQMD's off-site construction fee program, see <http://www.airquality.org/ceqa/ProjectsfundedwithMitFees.pdf>.

As explained in the 2006 DEIR/DEIS (page 3.15-2), the formation of ozone is a regional problem that is not tied to specific sources of emissions. Ozone is not directly emitted, but rather is created through a complex chemical reaction between two ozone precursors: reactive organic gases (ROG) and NO_x. Although ozone precursors are emitted at specific sources, they do not immediately react to form ozone. Instead, once the precursors are emitted, they mix in the atmosphere and contribute to the formation of ozone. Meteorological patterns dictate whether, and where, the pollutants actually react within the region to form ozone. Consequently, it is not necessary to restrict mitigation measures to location-specific on-site reductions. Rather, to control ozone it is important to control the overall level of precursor emissions within the Sacramento Ozone Nonattainment Region. ARB- and SMAQMD-approved plans to achieve the federal and state ozone standards are premised on this regional approach to reducing ozone precursors.

The SMAQMD Incentive Program helps to reduce overall levels of precursor pollutants by reducing emissions from vehicles and equipment operated within the region. Mobile sources account for 125 tons of the 143 tons per day of NO_x emitted within the region. Construction-related off-road equipment accounts for approximately 9% of the total NO_x inventory (SMAQMD 2006:3-6).

The amount of the construction mitigation fee is directly related to the daily construction-related NO_x impact, as identified in the environmental document, and the cost of providing off-site emissions reductions. The SMAQMD calculation formula ensures that a close nexus exists between each project's emissions and the level of reductions achieved through the mitigation fee.

In sum, the construction mitigation fee is closely related to the impact at issue. The fee is used to mitigate emissions from the same type of source (i.e., construction-related emissions of NO_x exhaust in the Sacramento region) and is targeted toward off-site rather than on-site emission sources. The fee amount is feasible and calculated in a manner that mitigates roughly the same amount of NO_x emissions generated by the project in excess of the threshold. Actual emissions reductions resulting from projects funded by off-site mitigation fees are monitored and tracked by SMAQMD through contractual agreements with funding recipients.

RTMM-6

The comment states that the fee required by Mitigation Measure 3.15-1 is problematic because it is so open-ended.

The timing of fee rate determination and calculation has been clarified on pages 3.15-22 through 3.15-23 of the 2006 DEIR/DEIS. The fee would be remitted to SMAQMD by the project applicant(s) before groundbreaking. The fee revenue would be allocated by SMAQMD for emissions reduction programs beginning soon after project construction (usually within 6–12 months).

RTMM-7 *The comment states that for the reasons described in comments RTMM-3 through RTMM-6, Mitigation Measure 3.15-1 as currently drafted is financially infeasible from the standpoint of the project applicant(s).*

For the reasons stated above, no financial infeasibility has been demonstrated.

RTMM-8 *The comment lists additional references to biological resources surveys to add.*

Since the time of this comment, Section 3.10 was recirculated in the 2008 RDEIR/SDEIS. As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, the following additional resources surveys listed by the commenter are hereby added to the list of references in Chapter 5 of the 2008 RDEIR/SDEIS:

ECORP Consulting, Inc. 2006. *Late Season Special-Status Plant Survey for Rio del Oro, Sacramento County, California.*

Miriam Green Associates. 1999. *Results of Surveys for Special-Status Wildlife Species at the Aerojet Property, Sacramento County, California.*

Sugnet and Associates. 1995. *Special-Status Species Determination, Aerojet Property, Sacramento County, California.*

RTMM-9 *The comment states that the areas labeled as elderberry savanna in Exhibit 3.10-1 should not be considered elderberry savanna.*

Vegetation classifications used in the 2008 RDEIR/SDEIS are based on Holland’s *Terrestrial Natural Communities of California* (Holland 1986). Elderberry savanna is the best-fit community description for the areas labeled as elderberry savanna in Exhibit 3.10-1. Holland describes elderberry savanna as “an open, winter-deciduous shrub savanna dominated by *Sambucus mexicana*, usually with an understory of introduced annual grasses and forbs.” This description is accurate for the vegetation found in the areas labeled as elderberry savanna and the commenter provides no justification for the assertion that elderberry savanna is not an accurate name and does not propose an alternative classification that more accurately describes this community.

RTMM-10 *The comment states that native Northern California black walnut appears unlikely to occur on-site based on the description of walnut trees on-site on page 3.10-12 of the 2006 DEIR/DEIS and that the potential for occurrence of this species in Table 3.10-1 should be revised from “known to occur” to “unlikely to occur.”*

Since the time this comment was provided, Section 3.10 of the 2006 DEIR/DEIS has been recirculated. As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, Table 3.10-1 of the 2008 RDEIR/SDEIS has been revised as follows:

Species	Status			Habitat and Blooming Period	Potential for Occurrence
	USFWS	DFG	CNPS		
Northern California black walnut <i>Juglans hindsii</i>	--		1B	Riparian scrub, riparian woodland. Blooms April-May	Known Unlikely to occur; walnut trees were identified at the project site during the tree survey in 2003 (Sierra Nevada Arborists 2003); <u>however, they are likely to be hybrids between <i>Juglans hindsii</i> and <i>J. regia</i>.</u>

RTMM-11 *The comment states that the results of the 2006 late-season special-status surveys should be cited where appropriate (e.g., slender and Sacramento Orcutt grass).*

The 2008 RDEIR/SDEIS includes discussion and citation of the 2006 late-season special-status plant surveys.

RTMM-12 *The comment states that Table 3.10-2 should be revised to state “Known to occur on-site, suitable nesting and foraging habitat present” for Cooper’s hawk, northern harrier, and western spadefoot toad, and “Likely to occur year round; suitable foraging habitat present; however, unlikely to nest as no suitable nesting habitat is present” for tricolored blackbird.*

The table was revised as suggested in the 2008 RDEIR/SDEIS (pages 3.10-10 and 3.10-11), with the exception of the suggested revision to tricolored blackbird. Page 3.10-13 of the 2008 RDEIR/SDEIS states that no suitable nesting habitat is present on the project site for tricolored blackbird. As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, the following revision has been made to Table 3.10-2 in the 2008 RDEIR/SDEIS:

Species	Listing Status		Habitat	Potential for Occurrence
	Federal	State		
Tricolored blackbird <i>Agelaius tricolor</i>	–	SC	Forages in agricultural land and grasslands; nests in marshes and other areas that support cattails or dense thickets	Likely to occur <u>forage</u> year-round; suitable <u>foraging</u> habitat present on-site; <u>unlikely to nest</u> ; <u>no suitable nesting habitat present</u>

RTMM-13 *The comment asks that information be added in to the EIR/EIS on page 3.10-11 about late-season special-status plant surveys conducted by ECORP in 2006, and mention that no special-status plants were observed.*

Information about the late-season special-status plant surveys conducted by ECORP in 2006 was provided on page 3.10-66 and in Table 3.10-1 of the 2008 RDEIR/SDEIS.

RTMM-14 *The comment asks that a reference to USFWS’s Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants, referenced in the text, be included in the References chapter of the EIR/EIS.*

This reference was included on page 5-8 of Chapter 5, “References,” of the 2008 RDEIR/SDEIS.

RTMM-15

The comment asks that the results of vernal pool branchiopod surveys conducted throughout the project site in 1994 be incorporated into the EIR/EIS because they provide information about distribution in portions of the site not surveyed by Gibson and Skordal (2000, 2001).

As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, the following revisions have been made to Table 3.10-2 in the 2008 RDEIR/SDEIS:

Species	Listing Status		Habitat	Potential for Occurrence
	Federal	State		
INVERTEBRATES				
Vernal pool fairy shrimp <i>Branchinecta lynchi</i>	T	–	Vernal pools in valley and foothill grasslands	Known to occur; suitable habitat present; documented on-site during focused surveys (<u>Sugnet and Associates 1994; Gibson & Skordal 2000b, 2001</u>)
Vernal pool tadpole shrimp <i>Lepidurus packardii</i>	E	–	Vernal pools in valley and foothill grasslands	Known to occur; suitable habitat present; documented on-site during focused surveys (<u>Sugnet and Associates 1994; Gibson & Skordal 2000b</u>)

As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, the following revision has been made to the first paragraph under “Federally Listed Vernal Pool Invertebrates” on page 3.10-54 of the 2008 RDEIR/SDEIS:

Suitable habitat for three federally listed vernal pool invertebrates is present on the project site. The vernal pool fairy shrimp and vernal pool tadpole shrimp have been identified in vernal pools located along the outer edges of the project site. Potential habitat for conservancy fairy shrimp is also present on the project site. Surveys for special-status aquatic invertebrates were conducted by Sugnet and Associates during February and March 1994. The surveys were conducted by pulling a D-frame 150-micron aquatic dip net across each pool. Each wetland basin present on the project site was sampled. The surveyors identified vernal pool fairy shrimp and vernal pool tadpole shrimp at numerous locations; however, the surveys did not identify any vernal pool conservancy fairy shrimp. Vernal pool tadpole shrimp were encountered in vernal pools, seasonal wetlands, and swales throughout the project site while vernal pool fairy shrimp were restricted primarily to vernal pools in the southern half of the project site. Vernal pool tadpole shrimp and conservancy fairy shrimp are Federally listed as endangered. Vernal pool fairy shrimp is federally listed as threatened.

RTMM-16

The comment recommends removing the designation of “federal species of concern” for California linderiella in the EIR/EIS because USFWS’s Sacramento office no longer maintains a species of concern list.

California linderiella was removed from the list of potentially occurring special-status species (Table 3.10-2) and from the impact analysis in the 2008 RDEIR/SDEIS.

- RTMM-17 *The comment asks that a reference to the late-season special-status plant surveys conducted by ECORP in 2006 be added on page 3.10-12 of the EIR/EIS.*
- See response to comment RTMM-13.
- RTMM-18 *The comment states that the U.S. Army Corps of Engineers verified the Rio del Oro wetland delineation prepared by ECORP on January 10, 2005, not in September 2004 as stated in the EIR/EIS.*
- As requested by the commenter, and as shown in Chapter 5 of this FEIR/FEIS, all references in Section 3.10, "Biological Resources," of the 2008 RDEIR/SDEIS to verification of the wetland delineation in 2004 have been changed to 2005.
- RTMM-19 *The comment states that a mapping error resulted in direct impacts on vernal pools being overstated, and that direct impacts total 15.072 acres.*
- This comment is addressed on page 3.10-25 of the 2008 RDEIR/SDEIS.
- RTMM-20 *The comment states that references to elderberry savanna should be deleted from Impact 3.10-2.*
- See response to comment RTMM-9.
- RTMM-21 *The comment asks that the EIR/EIS describe what proportion of "riparian" habitat has reached senescence and what proportion is associated with wetlands or other waters of the United States. The comment asks for quantification of what is meant by terms such as "a majority of riparian habitat," "small areas," and "most of the riparian..."*
- Page 3.10-46 of the 2008 RDEIR/SDEIS explains that most of the riparian vegetation on the site, with the exception of 4 acres of willow woodland and 57 acres of cottonwood-willow riparian forest, is slowly dying off because supporting hydrology is lacking. Therefore, what is meant by "most of the riparian" and "a majority of riparian habitat" is everything other than the 4 acres of willow woodland and the 57 acres of cottonwood-willow riparian forest. Page 3.10-47 of the 2008 RDEIR/SDEIS states, "removal of functionally intact riparian habitat such as the cottonwood-willow riparian forest and the willow woodland (approximately 61 acres total) would be considered a significant impact." In-depth analysis to determine how long each specific stand of riparian vegetation might persist under existing conditions was not conducted, and therefore more specific quantification cannot be provided. Although the majority of riparian habitat, generally meaning all but the 61 acres of willow woodland and cottonwood-willow riparian forest, does not appear to be self-sustaining over the long term, it is certainly providing important habitat functions in the present and loss of this habitat cannot be dismissed as insignificant. There would be at least a temporal loss between the time it would take for this habitat to gradually disappear over a period of decades and the time frame for removal with project development.
- RTMM-22 *The comment states that the elderberry mitigation plan is being developed through consultation with USFWS and will be "approved" by that agency through USACE's Section 7 consultation.*
- This comment is addressed on pages 3.10-61 and 3.10-62 of the 2008 RDEIR/SDEIS.

RTMM-23

The comment states that the statement that Impact 3.10-4 would be significant and unavoidable should be revised to more accurately reflect the potential acreages of special-status species' habitat that could be adversely affected by the project.

The acreage of habitat present on the project site, as discussed under Impact 3.10-4 in the 2008 RDEIR/SDEIS, is based on the information provided in the baseline studies, including the verified wetland delineation. The preparers of the EIR/EIS are unaware of any inaccuracies in the information provided and the comment does not specify what acreage numbers are inaccurate.

RTMM-24

The commenter provides additional information regarding the purchase of and proposal to preserve and protect a 160-acre parcel in Sacramento County to offset unavoidable losses to vernal pool habitat.

This comment was addressed on pages 3.10-28 through 3.10-35 of the 2008 RDEIR/SDEIS and in Appendix Q.



February 5, 2007

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

Re: Rio Del Oro Specific Plan DEIR/DEIS

Habitat 2020 is a committee of environmental organizations collaborating on common issues in and affecting Sacramento County. Habitat 2020 member organizations are Sacramento Audubon Society, Save the American River Association, Sacramento Urban Creeks Council, California Native Plant Society-Sacramento Valley Chapter, Environmental Council Of Sacramento, Sierra Club-Mother Lode Chapter, Friends of Swainson's Hawk, and Save Our Sandhill Cranes. The mission of Habitat 2020 is to protect the lands and waters where our wildlife and native plants live in Sacramento County.

Means by which habitat protection can occur include establishment and maintenance of viable preserves, habitat-friendly agriculture such as grazing, and containment of urban, suburban and rural sprawl. Our organization and its members have commented on the Rancho Cordova General Plan and various proposed development projects.

GENERAL COMMENTS

The project as proposed has some commendable features. The vernal pool/wetland preserve is well-chosen for the site. An effort to create higher housing densities is laudable; including higher density in Phase 1 increases the likelihood that it will, in fact, be built as planned. The early planning for trails, as well, is an important step in realizing a safe and usable trail system.

Habitat-1

General project concerns:

The vernal pool preserve as designed will be unviable, and therefore not truly mitigate for the project's impact on wetlands.

The riparian forest is not being preserved.

The opportunity for higher densities and more mixed use as set up in the SACOG Blueprint are not being met.

The potential impacts of soil and groundwater contamination and their remediation has not been taken fully into account.

Habitat-2

General EIR/EIS concerns:

The EIR does not make clear important relationships such as contamination and its potential impacts on the project, the effect of roads through the wetland preserve, and the impacts of supplying water.

Habitat-3

VERNAL POOLS

This comment letter incorporates by reference the California Native Plant Society comment letter submitted by Carol Witham.

Page 2-22 of the DEIS states, "The wetland preserve would likely be established during development Phase 1, although it would be expanded and continue to be improved as later development phases come on line. The Mitigation & Monitoring Plan dated 1-18-06 says, "In order to compensate for temporal losses, the 507-acre vernal pool mitigation area and 26 acre detention basin will be established concurrent with Phase 1 impacts." Yet, Exhibit 2-14 phasing plan, shows a 6 lane Rancho Cordova Parkway and the wetland preserve to its west will be constructed/established during Phase 3. The larger portion of the wetland preserve is in Phase 5. The wetland preserve areas, especially those bordering the new road, will be impacted by road construction and use in Phase 3, but less than one-third of the wetland preserve will be established in that phase according to Exhibit 2-14. It is not at all clear to the reader when the wetland preserve will be established. How will the wetlands to the east of the road be impacted by the Phase 3 construction and road? How and when will those impacts be mitigated? An O&M Plan has not yet been prepared. Conditions of approval should include Operations & Management Plan. Include a mitigation measure that requires land use on preserve land not to be changed (i.e. grazing) until full implementation of O&M Plan, which may include grazing. Include another mitigation measure that would require compatibility with HCP preserve management standards that are currently under development (if those standards are developed when the O&M Plan is set for approval). This would leave open the possibility of management by the HCP as a way to cut costs and have more effective results.

Habitat-4

Three culverts are being proposed as part of the road mitigation. What is the evidence that this will adequately protect wildlife? Terrestrial animals will be unable to use the culverts when the creek is full. Why is Rancho Cordova Parkway 6 lanes through the preserve? The EIR should discuss the alternative of making Villagio Drive 6 lanes and eliminating the road through the preserve or moving it to the west side of the preserve. Other alternatives worthy of consideration and analysis would be to elevate the roads through the preserve or add several culverts. The FEIR should include a more complete discussion of impacts of the proposed roads on the preserve and offer more effective mitigation.

Habitat-5

Americanos Boulevard is configured to cross a wide eastern section of the proposed preserve. According to the 2-25-04 NOP response letter from Sacramento County Infrastructure Finance Section, this is "inconsistent with the ... Sunridge Specific Plan, which is along the eastern boundary of Rio Del Oro." An eastern boundary road would lessen the impact of the road on the wetland. Was this alignment considered? A more complete discussion of road alternatives and the impacts of the roads on the preserve is needed.

Habitat-6

HYDROLOGY/STORMWATER RUNOFF AND QUALITY

The Folsom South Canal is mentioned as a constraint to storm water conveyance off site. Given the flooding that has occurred in Anatolia, south of Rio Del Oro, this reader is skeptical that the proposed project has planned for adequate storm water conveyance. The FEIR should discuss the Anatolia flooding problems and show how the Rio Del Oro storm water conveyance will be effective.

Habitat-7

The traditional handling of urban storm water runoff has led to degraded urban creeks throughout Sacramento County. The resulting accelerated erosion of the creek banks leaves sedimentation on the creek bed that is deadly to creek life. Eroding banks mean loss of vegetation and open space. This is avoidable. These impacts are not mentioned in the EIR. A storm water system that would avoid these impacts should be designed. Please conduct a hydrogeomorphic evaluation of runoff to the Morrison Creek tributary to ensure that the post-development hydrograph matches the pre-development hydrograph over the full range of rainfall frequencies and duration. (Not only design storm events, e.g. not 5, 10, 50, 100 year events)

Habitat-8

Mather Lake is downstream of the project area. It is part of a system that supports a rich diversity of wildlife. Storm water that flows to the creek needs to have treatment en route to the creek through vegetative swales/constructed treatment wetlands and management practices to ensure that the creek is neither over watered nor dewatered over any reach as compared to its current condition. It is not clear from the EIR that this is the plan.

Habitat-9

COTTONWOOD-WILLOW RIPARIAN FOREST

The Habitat Assessment (part of the EIR/EIS Appendix) concludes, "The portion of the Rio Del Oro project site most valuable for preservation are those containing the cottonwood-willow riparian forest in the southeastern quadrant of the site and the vernal pool grassland..." However the riparian forest is designated Single Family Residential (Area 47). The forest is characterized by a relatively high level of structural diversity. It resembles that of true riparian forest. The health of the trees is good and they are regenerating well. The FEIR should discuss the alternative of preserving this riparian forest of about 50 acres and replacing surrounding land uses with a higher density. The forest should be connected to the wetland preserve by Area 45 or Area 44. The preservation of this forest along with a wide connection to the wetland preserve will greatly enhance the wildlife value of both. Additionally, the forest could have walking trails similar to those at Gold River which are a wonderful community amenity.

Habitat-10

HOUSING DENSITIES/MIXED USE

The regional impact of the lower density proposed project needs to be fully disclosed. Higher greenhouse gas emissions, cost of roads and other infrastructure, underutilization of public transit and loss of funding, accelerated loss of habitat and open space are some of the impacts to be considered.

Habitat-11

CONTAMINATION

Page 3.1-23 of the EIR states Department of Toxic Substance Control "may, where appropriate, place limits on future land uses through deed restrictions and easements on conveyances, and use restrictions on leases. If minor modifications to the land uses currently identified in the land use plans would be required based on future DTSC findings, the Rio Del Oro Specific Plan would be amended as necessary." Who

Habitat-12

determines appropriateness? What if "major" modifications were required? What would be the range of impacts if amendments to the plan were required?

The FEIR discussion should contain a figure that depicts the areas that are being investigated for contamination and cleaned overlain by the proposed future land uses and the development phase. In addition, include an account of each identified toxic site, status of the Remediation Action Plan for that site, when clean-up is expected to commence and end, and the proposed land use and phase. What are the known and expected impacts of clean-up on the development? Include contamination/remediation on land and groundwater not on the project site that may impact the project. Since Superfund clean-ups often take much longer to accomplish than planned, the FEIR needs to discuss the impacts of clean-up delays. This discussion needs to be comprehensive and integrated into the project so that foreseeable impacts are clear to the decision makers and to the public. Mitigation planning at this planning stage will be much easier than after development has begun. If impacts are not clearly understood now to the extent feasible and accompanying measures to mitigation, the worse scenario (more costs, more property value upsets, more unhappy constituents, more losers, etc.) will be played out later.

Habitat-
12 cont.

WATER SUPPLY

In light of the recent California Supreme Court ruling on the Vineyard water supply, please review the impacts section of water supply to ensure that all impacts have been disclosed. The EIR/EIS must clearly and coherently explain how the long-term demand is likely to be met by these sources, the environmental impacts of exploiting those sources, and how those impacts are to be mitigated.

Habitat-
13

Please explain more clearly how remediated groundwater water might be used for water supply. Which residents would be likely to receive this water? Replacement water may not be available in 2011 as stated in the EIR. The projected date has already slipped from 2010. A new delay is brewing over water rights. What would be the impact of increased delays of replacement water?

Habitat-
14

Sincerely,

Alta Tura
Alta Tura
Member, Habitat 2020

Habitat-1

The comment states that the vernal pool/wetland preserve is well-chosen for the site and commends the effort to create higher housing densities, particularly in Phase 1, and early planning for trails.

The comment is noted.

Habitat-2

The comment states that the proposed preserve as designed will be “unviable” and therefore will not truly mitigate the project’s impact on wetlands.

The commenter has not provided any information to support the assertion that the proposed preserve would be “unviable,” nor did the comment specify how the proposed preserve would be “unviable,” therefore, specific responses cannot be provided for this comment. However, responses to comments USFWS-1, USFWS-2, USFWS-3, USFWS-4, and USFWS-5 provide additional information on the viability of the proposed preserve.

The comment states a concern that the “riparian forest” is not being preserved.

The 2008 RDEIR/SDEIS provides a detailed discussion of the quantity and quality of riparian habitat and impacts on that habitat. (2008 RDEIR/SDEIS, page 3.10-46 to page 3.10-48.) The 2008 RDEIR/SDEIS concludes that the Proposed Project and High Density Alternatives would result in direct and indirect significant impacts. (2008 RDEIR/SDEIS, page 3.10-47.) Mitigation Measure 3.10-2b requires the project applicant(s) to develop and implement a habitat MMP to replace the 57 acres of cottonwood willow riparian woodland and 4 acres of willow scrub at no-net-loss acreage to preserve the overall habitat functions. (2008 RDEIR/SDEIS, pages 3.10-50 to 3.0-51.) Nevertheless, the 2008 RDEIR/SDEIS concludes that impacts on riparian habitat would remain significant and unavoidable.

The comment states that the opportunity for higher densities and more mixed use as set up in the SACOG Blueprint is not being met, and that the potential impacts of soil and groundwater contamination and their remediation have not been taken fully into account.

The EIR finds that the Proposed Project Alternative is consistent with the SACOG Blueprint (see 2006 DEIR/DEIS, pages 3.1-9 through 3.1-13 and page 3.1-25). The Proposed Project Alternative is consistent with Smart Growth principles. The High Density Alternative is also consistent with the SACOG Blueprint (see 2006 DEIR/DEIS, pages 3.1-9 through 3.1-13 and 3.1-25).

The City believes that the potential impacts of soil and groundwater contamination have been fully and thoroughly taken into account and appropriately analyzed in the 2006 DEIR/DEIS. Section 13 therein contains 29 pages of text and exhibits, including a thorough description of all known on-site soil and groundwater contamination along with a table (Table 3.13-1) listing the remediation status of each operable unit. The City believes that Section 13, “Hazards and Hazardous Materials,” provides a thorough impact analysis of the appropriate thresholds, which are based on Appendix G of the State CEQA Guidelines.

Habitat-3

The comment states that the EIR/EIS does not clarify relationships such as contamination and its potential impacts on the project, the effect of roads through the wetland preserve, and the impacts of supplying water.

The City believes that the potential impacts of soil and groundwater contamination have been fully and thoroughly taken into account and appropriately analyzed in the 2006 DEIR/DEIS. Please see response to comment Habitat-2, above.

With regard to the effects of roads through the wetland preserve, see response to comment Habitat-4, below.

The impacts of supplying water were addressed in Section 3.5, “Utilities and Service Systems—Water Supply,” of the 2008 RDEIR/SDEIS.

Habitat-4

The comment states that the EIR/EIS is unclear about when the wetland preserve will be established, how the wetlands to the east of the six-lane Rancho Cordova Parkway will be affected by the Phase 3 construction and road, and how and when those impacts will be mitigated.

See responses to comments USFWS-1 and USFWS-10 for discussion of impacts on the proposed wetland preserve from proposed Rancho Cordova Parkway and proposed mitigation measures.

As specified in Mitigation Measure 3.10-1a (2008 RDEIR/SDEIS, pages 3.10-40 to 3.10-43), a mitigation plan must be implemented before the approval of grading or improvement plans or any ground-disturbing activities for any project development phase containing wetlands or other waters of the United States or waters of the state. The MMP must be approved before any impact on wetlands or waters of the United States or waters of the state can occur. Mitigation must be implemented on an ongoing basis throughout and after construction, as required. The project applicants have proposed that the conservation easement be established over the wetland preserve during development Phase 1, with construction of the preserve features to take place during Phases 3 and 5.

The comment also suggests requiring an O&M plan as a condition of approval.

Mitigation Measure 3.10-1a of the 2008 RDEIR/SDEIS requires the project applicant(s) to obtain a CWA Section 404 permit before conducting any groundbreaking activity that requires fill of waters of the United States or waters of the state. The project applicant(s) will also need to obtain incidental take coverage through USACE’s consultation with USFWS through Section 7 of the ESA. An O&M plan will be required before permit approval.

The comment also suggests requiring compatibility with habitat conservation plan (HCP) preserve management standards as a mitigation measure.

The SSCHCP is not scheduled for completion, adoption, and implementation until 2011. The SSCHCP currently assumes that the proposed on-site wetland preserve is established. It is also expected that this project will receive its 404 permit approvals and associated biological opinion before the SSCHCP is adopted.

Habitat-5

The comment asks what evidence exists that the proposed culverts for roads crossing the preserve will adequately protect wildlife. The comment also states that terrestrial animals will be unable to use the culverts when the creek is full.

As shown in 2006 DEIR/DEIS Exhibits 2-7 and 2-8, the Rio del Oro project would incorporate Con-Span arched bridges in areas where the proposed roads would cross Morrison Creek and the proposed preserve. The Con-Span design allows movement of wildlife by spanning the width of movement corridors, including streams. As shown in Exhibit 2-8, the Con-Span bridges would allow adequate room for movement by terrestrial wildlife, even when Morrison Creek is full.

The comment also asks why Rancho Cordova Parkway is six lanes through the preserve and states that the EIR should discuss the alternative of making Villagio Drive six lanes and eliminating the road through the preserve or moving it to the west side of the preserve.

Rancho Cordova Parkway is designated as a six-lane road in the City General Plan. Its location at the southern end of the project site has essentially been fixed by prior project approvals. Making Villagio Drive a six-lane road would not be consistent with the City General Plan, nor would it provide for adequate connection to areas south of the project site. Therefore, expanding Villagio Drive would likely not reduce the need for a six-lane road at Rancho Cordova Parkway. See responses to comments USFWS-1 and USFWS-10 for further detail on Rancho Cordova Parkway.

The comment also suggests consideration of elevating roads through the preserve or adding several culverts.

Based on the current *Rio del Oro Specific Plan Public Facilities Finance Plan*, constructing Rancho Cordova Parkway from Villagio Drive to Douglas Road (the portion of the roadway that would cross the proposed wetland preserve) would cost approximately \$5,019,000. Based on bridge cost factors provided by City Public Works staff (in 2007 dollars), elevating Rancho Cordova Parkway in the proposed wetland preserve area would substantially increase the cost of this roadway section, to approximately \$97,200,000. This cost is economically infeasible and would adversely affect current fees and financial planning by the City associated with its CIP for roadway improvements.

The 2008 RDEIR/SDEIS acknowledges that constructing roads in the proposed preserve could disrupt or eliminate hydrologic connectivity that is important to support vernal pools and the plant and wildlife species that inhabit the pools. (2008 RDEIR/SDEIS, page 3.10-27.) However, measures to minimize such impacts have been incorporated into the project design and the hydrologic analysis indicates that Rancho Cordova Parkway would not compromise the hydrological integrity of the preserved wetlands, as discussed in response to comment USFWS-1.

The comment does not suggest what additional analysis or mitigation measures should be included in the EIR/EIS.

Habitat-6

The comment states that moving Americanos Boulevard to the eastern boundary would lessen the impact of the road on the wetland.

The proposed footprint of Americanos Boulevard was designed to minimize impacts on wetlands. Locating the road farther east would affect a connected preserve in the eastern property, and would not provide the necessary transportation connections contemplated by the Circulation Element of the City General Plan.

- Habitat-7 *The comment states that the FEIR/EIS should discuss the flooding that has occurred in Anatolia, south of Rio del Oro, and show how the Rio del Oro stormwater conveyance will be effective.*
- The County Department of Water Resources developed a report addressing the flooding problems that occurred in January 2006 (*Flood Review Report for Anatolia II Subdivision, City of Rancho Cordova*, prepared by Sacramento County Department of Water Resources, January 2006). This report states: “Water Resources has concluded that the subject flooding occurred in the Anatolia area because of construction activity and temporary construction design.” The Anatolia flooding was caused by construction issues and was not a design issue.
- Habitat-8 *The comment states that the EIR/EIS does not address impacts of sedimentation on creekbeds and loss of vegetation and open space from accelerated erosion of urban creeks from urban stormwater runoff. The comment asks that a hydrogeomorphic evaluation of runoff to the Morrison Creek tributary be conducted to ensure that the postdevelopment hydrograph matches the predevelopment hydrograph over the full range of rainfall frequencies and duration.*
- The proposed Rio del Oro project has been designed consistent with the requirements of the County Department of Water Resources and the criteria of the Central Valley RWQCB. The drainage system would include vegetated swales and treatment BMPs constructed with the project in the open space/drainage channel areas. The three proposed detention basins would also provide facilities to treat stormwater consistent with the regional municipal stormwater permit issued by the Central Valley RWQCB. The project includes a drain pipe system designed to capture runoff and stormwater and discharge to created drainage parkways with vegetated water quality swales. Project design also includes three stormwater detention basins that would be used to attenuate peak flows, thereby maintaining peak flows in Morrison Creek at existing levels.
- Habitat-9 *The comment states that stormwater that flows to Morrison Creek needs to be treated en route through vegetative swales/constructed treatment wetlands and management practices to ensure that the creek is neither overwatered nor dewatered.*
- The stormwater from the proposed Rio del Oro project would pass through the vegetated swales and treatment BMPs constructed with the project in the open space/drainage channel areas. The three proposed detention basins would also provide facilities to treat stormwater consistent with the regional municipal stormwater permit issued by the Central Valley RWQCB.
- Habitat-10 *The comment recommends preservation of the cottonwood-willow riparian forest and replacing surrounding land uses with a higher density.*
- See response to comment Habitat-2 for a discussion of impacts on the cottonwood-willow riparian area.
- Habitat-11 *The comment states that the regional impact of the lower density proposed project needs to be fully disclosed, citing higher greenhouse gas (GHG) emissions, cost of roads and other infrastructure, underutilization of public transit and loss of funding, and accelerated loss of habitat and open space.*
- The City is uncertain as to which alternative the commenter is referring to when it states “the lower density proposed project.” The DEIR/DEIS evaluates five alternatives at an

equal level of detail: proposed project, high density, impact minimization, no federal action, and no project. Assuming that the commenter is referring to the Impact Minimization Alternative, see Impacts 3.15-7 and 3.15-14 in the 2006 DEIR/DEIS related to greenhouse gas emissions. See Impacts 3.10-1 through 3.10-6 in the 2008 RDEIR/SDEIS related to loss of habitat and open space. Cost of roads and other infrastructure, and loss of funding related to public transit, are not physical impacts on the environment and therefore are not required to be analyzed in this EIR/EIS.

Habitat-12

The comment asks who determines the appropriateness of limits on future land uses imposed by DTSC, what would happen if major modifications to the land uses in the Rio del Oro land use plans were required based on DTSC findings, and what the range of impacts would be if amendments to the plan were required.

DTSC has the authority to place limits on future land uses, as stated in Impact 3.13-2 in the 2006 DEIR/DEIS. Based on the many years worth of hazards materials investigations previously conducted on the project site, there is no potential for “major modifications” to the land use plan as suggested by the commenter. If minor modifications to the land use plan (as contemplated by Impact 3.13-2) were to be required in the future, the City, as CEQA lead agency, would be required to review any environmental documents in effect at the time of the requested land use modification to determine whether the range of potential impacts from the DTSC-required land use change would be substantially different from, or substantially the same as, the impacts identified those environmental documents.

The comment suggests adding a figure to the FEIR that depicts areas being investigated for contamination and cleaned, overlain by the proposed future land uses and the development phase. The comment also suggests including an account of each identified toxic site, status of the Remediation Action Plan for that site, when cleanup is expected to begin and end, and the proposed land use and phase.

The information requested by the commenter is contained in Exhibit 2-4, Exhibit 3.13-1, pages 3.13-6 through 3.13-14, and Table 31.3-1 of the 2006 DEIR/DEIS.

The comment requests a discussion of known and expected impacts of cleanup on the development, including contamination/remediation on land and groundwater not on the project site that may affect the project, and a discussion of the effects of cleanup delays.

Please see Impacts 3.13-1 and 3.13-2 in the 2006 DEIR/DEIS regarding impacts of cleanup on the development and the effects of cleanup delays. Cleanup activities off the project site would have no impact on project site development because (1) remediation of soil is site-specific, (2) the Rio del Oro development project is prohibited by law from using groundwater flowing underneath the surface (either on or off the site), and (3) the groundwater table is more than 100 feet below the ground surface and therefore no one at the project site would come into contact with it (see Impact 3.13-1).

Habitat-13

The comment requests that the water supply impacts of the 2006 DEIR/DEIS be reviewed to ensure that all impacts have been disclosed in light of the California Supreme Court's recent ruling on the Vineyard water supply.

Please see Section 3.5, "Utilities and Service Systems—Water Supply," of the 2008 RDEIR/SDEIS, which was prepared in compliance with the California Supreme Court's direction in the *Vineyard* case.

Habitat-14

The comment requests additional explanation of how remediated groundwater might be used for water supply.

Please see Section 3.5, "Utilities and Service Systems—Water Supply," of the 2008 RDEIR/SDEIS and Master Response 1, "Adequacy of Long-Term Water Supply," in Chapter 3 of this FEIR/EIS.

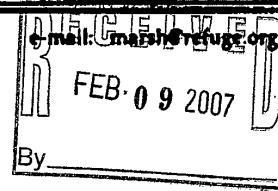


CITIZENS COMMITTEE TO COMPLETE THE REFUGE

453 Tennessee Lane, Palo Alto CA 94306

Tel 650 493-5540

Fax 650 494-7640



Anna Sutton
U.S. Army Corps of Engineers, Regulatory Branch
1325 J Street, Room 1480
Sacramento, CA 95814-2922
FAX 916-557-6877

February 9, 2007

Patrick Angell
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova, CA 95670
FAX 916-851-8787

RE: Rio del Oro Specific Plan DEIS

Dear Ms. Sutton and Mr. Angell,

This responds to the Draft Environmental Impact Statement (DEIS) for the Rio del Oro Specific Plan. The Citizens Committee to Complete the Refuge has an ongoing history of interest in wetlands protection, wetlands restoration and wetlands acquisition. As such we have actively participated in the California Environmental Quality Act (CEQA), Clean Water Act (CWA), National Environmental Policy Act (NEPA), and Endangered Species Act (ESA) review processes. The Committee is based in the San Francisco Bay Area, but we have voiced our concerns on Clean Water Act regulations at the national level, and have lent our support to environmental groups throughout California and as far away as Japan. We had submitted comments for the public notice released by the Corps in early 2004 and had not heard anything more about the project until just recently therefore our comments are based upon a very cursory review. We would like to thank you for the opportunity to provide comments.

The adverse impacts to waters of the U. S. and state proposed in the specific plan are substantial and significant. Under the proposed project alternative 30.3 acres of jurisdictional waters of the U.S. (including approximately 17.3 acres of vernal pools) and 12.9 acres of non-jurisdictional waters (not regulated by the Corps of Engineers, but regulated by the State Water Resources Control Board) would be filled. In addition at least 2.2 acres of vernal pools on-site would be impacted by indirect impacts. It is not clear from the information provided whether indirect impacts may occur onsite (through mitigation creation activities, etc. or to waters of the U.S. or state outside the specific area plan boundaries.

The proposed project alternative is not the least environmentally damaging practicable alternative (LEDPA). The DEIS identifies the Impact Minimization Alternative as the environmentally superior alternative for California Environmental

Citizens-1

Citizens-2

Quality Act (CEQA) purposes. This alternative would create a preserve area of approximately 995 acres located in the southern portion of the specific plan area. Under this alternative only 13.5 acres of jurisdictional waters would be filled (though the same acreage of non-jurisdictional waters would still be impacted) which is less than half the acreage that would be impacted by the proposed project alternative. In addition, 43 acres of waters would be preserved under the impact minimization alternative as opposed to 26 acres. This alternative would provide greater buffer between the developed areas and the vernal pool complex and the Morrison Creek corridor and could provide a greater opportunity to recreate riparian habitat (another imperiled habitat type within the Central Valley) along Morrison Creek. Given the dense development proposed for this region, a larger preserve area is necessary to protect these sensitive habitats from human disturbance, intrusion by domestic pets, non-native animals, and feral animals, intrusion of non-native plants from surrounding developed and landscaped areas, introduction of hydrocarbons from increased automobile traffic, and potential introduction of fertilizers, pesticides, and herbicides from developed area (not a complete list).

Citizens-2
cont.

In view of the rampant development within the Sacramento Valley it is crucial large tracts of vernal pool habitat are preserved to offset the significant historic and ongoing losses of this important habitat type, especially in view of the numerous federally-listed and special status plants and animals that are associated with vernal pools and the surrounding upland areas. We are very concerned these areas not only are preserved, but that the manner in which they are preserved will ensure their long-term viability.

Regulatory and resource agencies must ensure these areas will continue to function ecologically beyond the required monitoring periods. Towards that end, we are disturbed by a number of aspects of the mitigation proposal. Under the proposed project alternative a 507-acre preserve would be established in the southeastern corner of the specific area. Approximately 26 acres of waters of the U.S. will be preserved, including approximately 18 acres of vernal pools. However, the mitigation plan proposes the creation of approximately 20 acres of new vernal pools within the preserve complex. We do not support the creation of new vernal pools within an existing vernal pool complex. Insufficient information has been provided in the DEIS to demonstrate vernal pool creation can occur within the preserve area without adversely impacting the existing vernal pool ecosystem (e.g. likely disruption of existing vernal pool complex hydrology, removal of habitat necessary to support vernal pool plant pollinators, etc.).

Citizens-3

The proposed preserve area would be fragmented by the proposed extension of Jaeger Road. This is unacceptable. The proposed installation of a con-span "bridge" does not adequately offset the substantial reduction in connectivity that will occur once roadway fill is placed across the width of the wetland preserve. The road must be realigned around the preserve area or at the very least elevated across the width of the preserve. Requiring an elevated road through a vernal pool preserve is not without precedent. An elevated roadway was required for the Pacific Commons project in the City of Fremont, located in Alameda County. The elevation of the roadway provided the opportunity to extend a four lane thoroughfare, pedestrian walkway, and bike path, over a

Citizens-4

vernal pool preserve, while maintaining the hydrologic and ecological connectivity between two components of the vernal pool preserve.

Citizens-4
cont.

The DEIS states the long-term owner of the proposed mitigation site will be the City of Rancho Cordova or other public agency. We are strongly opposed to the proposed mitigation site being turned over to the city. The city must balance a multitude of interests. We believe the preserve must be turned over to an entity whose primary focus is the management of natural lands and wildlife and has the experience to identify and implement contingency measures if required.

Citizens-5

We question whether adequate surveys for listed and special status plant species have been conducted. It appears from the DEIS that protocol level plant surveys were conducted during one growing season (though not all surveys for the different individual species were conducted in the same time frame). Plant populations associated with vernal pool ecosystems are variable from year-to-year. A particular location may support individuals one year and not the next. Before any ground manipulation is authorized, additional protocol level surveys should be conducted.

Citizens-6

The DEIS proposes a five-year monitoring period for mitigation areas, this monitoring period is insufficient, especially given the proximity to development and the isolation of the preserve area from adjacent vernal pool habitat. A ten-year monitoring period should be required especially if the resource agencies authorize the creation of new vernal pool habitat within the preserve area.

Citizens-7

If creation of vernal pool habitat is permitted within the preserve, then there are a number of measures that must be incorporated into a mitigation plan to ensure existing on-site habitat will be protected. Baseline data of the preserve must be collected prior to implementation, for example, determining the hydroperiod of existing ponds to monitor whether the creation of new pools adversely affects the hydroperiod of pre-existing pools. When accounting for acreage of waters of the U.S. within the preserve, existing and created acreages should be tracked separately. Acreage of existing waters of the U.S. should be maintained over time. Losses in existing vernal pool acreage due to changes in hydrology resulting from vernal pool creation is not acceptable – that is expansion of created wetlands at the expense of pre-existing wetlands is not acceptable. Off-site reference sites should be identified and monitored. Baseline data should be collected for the listed and special status species so the amount of take can be determined and the degree to which the take is mitigated can be assessed. Appropriate, measurable performance standards must be established and monitored for created and existing waters.

Citizens-8

Preservation of habitat and mitigation should occur in advance of fill activities. However, if phasing of mitigation or preservation is authorized, then additional phases of development should not be allowed to proceed if monitoring indicates degradation of the pre-existing jurisdictional waters within the preserve area, or if the created habitat is not meeting interim success criteria.

Citizens-9

As was mentioned, these comments are based upon a cursory review of the DEIS. We continue to be alarmed by the rate at which vernal pool habitat is being developed within the Central Valley corridor. Large, viable preserves that have connectivity to undeveloped open space must be created. However, surrounding these preserves by dense development without adequate buffer zones, or fragmenting the preserves by road crossings, severely compromises their long-term viability. Funds must be available to effectively manage these preserves in perpetuity, and the resource agencies must continue to monitor preserves after the mitigation and monitoring periods have ended to ensure they are being properly maintained. We thank you for the opportunity to provide comments and we would like to receive all future notices concerning this project.

Sincerely,



Florence M. LaRiviere
Chairperson

Citizens-1

The comment repeats impacts listed in the 2006 DEIR/DEIS, and notes that it is not clear whether the indirect impacts may occur on-site (through mitigation creation activities, etc., or to waters of the United States or state outside the specific area plan boundaries).

The 2.2 acres of indirect impacts on vernal pools discussed on page 3.10-22 are impacts on vernal pools within the project boundaries. The Rio del Oro project would not result in direct or indirect impacts on vernal pools or other waters of the United States off-site.

Citizens-2

The comment states that the proposed project is not the least environmentally damaging practicable alternative, and states that a larger preserve is necessary.

To receive a permit to fill waters within USACE jurisdiction, the project applicant(s) must demonstrate that the Proposed Project Alternative is the LEDPA. The project applicant(s) have submitted to USACE a detailed analysis of the practicability of the various alternatives analyzed in the 2006 DEIR/DEIS, plus several additional alternatives. USACE has not yet made a determination on the LEDPA. The determination will be made in the ROD. See responses to comments EPA-1 and EPA-2.

Citizens-3

The comment states a concern regarding creation of vernal pools within the proposed vernal pool preserve.

See responses to comments USFWS-1 and USFWS-4 for a discussion of the design of created vernal pools within the proposed preserve.

Citizens-4

The comment expresses the commenter's opinion that the extension of Jaeger Road (Rancho Cordova Parkway) through the preserve is unacceptable, and suggests the road should be realigned or elevated.

See responses to comments Habitat-5, USFWS-1, and USFWS-10 for a discussion of the impacts of Rancho Cordova Parkway, its alignment, and the potential to elevate the roadway.

Citizens-5

The comment states the commenter's opinion that ownership of the proposed preserve should not be handed over to the City.

See response to comment CNPS-5 for an explanation of ownership and management of the proposed preserve.

Citizens-6

The comment states that additional protocol-level special-status plant surveys should be conducted.

In June and July 2006, a late-season special-status plant survey was conducted, which was the second special-status plant survey for the project site. Surveys were conducted according to California Department of Fish and Game (DFG) and USFWS protocols. No targeted special-status plants were observed within the project site.

Citizens-7 *The comment states that a 10-year monitoring program for mitigation areas should be required.*

See response to comment CNPS-8 for a discussion of the draft 2009 MMP.

Citizens-8 *The comment suggests measures to be included in the wetlands mitigation and monitoring plan, including establishing baseline data and performance criteria.*

See response to comment CNPS-7 for a discussion of the success criteria for the wetland MMP (draft 2009 MMP).

In early summer 2008, the California Rapid Assessment Method (CRAM) was used to evaluate baseline conditions of the project wetlands. The use of CRAM in establishing baseline conditions and in future monitoring, as well as proposed success criteria, is described in the 2009 draft wetland MMP attached as revised Appendix Q to this FEIR/FEIS.

Mitigation Measure 3.10-1a of the 2008 RDEIR/SDEIS requires that the final approved wetland MMP include success criteria and performance standards along with remedial actions to be taken if success criteria are not being met.

Citizens-9 *The comment suggests that preservation of habitat and mitigation should occur in advance of fill activities. Additional phases of development should not be allowed to proceed if monitoring indicates degradation of existing jurisdictional water or created habitat is not meeting success criteria.*

See response to comment USFWS-12 for a discussion of the phasing of mitigation. Mitigation Measure 3.10-1a of the 2008 RDEIR/SDEIS shall be implemented before the approval of grading or improvement plans or any ground-disturbing activities for any project development phase containing wetland features or other waters of the United States or waters of the state. The MMP must be approved before any impact on waters of the United States or waters of the state can occur. Mitigation shall be implemented on an ongoing basis throughout and after construction, as required.

SECTION E

Commenters at the Public Hearing

THE CITY OF RANCHO CORDOVA
PLANNING COMMISSION

PUBLIC MEETING

DRAFT EIR/EIS FOR THE RIO DEL ORO SPECIFIC PLAN

THURSDAY, JANUARY 11, 2007

DAVID B. ROBERTS COUNCIL CHAMBERS
RANCHO CORDOVA, CALIFORNIA
6:30 P.M.

REPORTED BY:

ESTHER F. SCHWARTZ
CSR NO. 1564

CAPITOL REPORTERS (916) 923-5447

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ATTENDEES

PLANNING COMMISSIONERS:

- ERNEST VANCE, CHAIR
- THERESE BURKE
- TROY L. KONARSKI
- RAYMOND SAVORN
- MATTHEW CUMMINGS

CITY STAFF:

- THERESE BURKE, PLANNING COMMISSION CLERK
- PAUL JUNKER, PLANNING DIRECTOR
- PATRICK ANGELL

UNITED STATES ARMY CORPS OF ENGINEERS:

- ANNA SUTTON

GENCORP REALTY INVESTMENTS:

- DAVID HATCH

ELLIOTT HOMES:

- RUSS DAVIS

INTERESTED PERSONS:

- ALEX MACDONALD
- ALTA TURA

---oOo---

1 RANCHO CORDOVA, CALIFORNIA

2 THURSDAY, JANUARY 11, 2007

3 ---oOo---

4 CHAIR VANCE: This brings us to our
5 regular calendar, No. 5, which is Rio del Oro
6 Specific Plan. I think we probably have Pam and her
7 group on this one.

8 MR. JUNKER: Actually, Pat Angell, the
9 Senior Environmental Director for your Department.

10 CHAIR VANCE: Okay.

11 MR. ANGELL: Actually, Pam is here to
12 provide me backup.

13 CHAIR VANCE: Okay.

14 MR. ANGELL: Good evening, Commissioners.
15 Tonight, what we are going to do is provide a
16 presentation on the -- provide an opportunity for
17 the public and interested agencies to comment on the
18 Draft EIR/EIS which was released back in December.
19 Comment period extends to February 5th.

20 The unique thing about this and it's unusual
21 from previous environmental documents provided to
22 the Commission is this is a joint EIR/EIS which
23 complies with the California Environmental Quality
24 Act and National Environmental Policy Act. This has
25 been a joint effort by City staff and the Corps of

1 Engineers. And tonight I have Anna Sutton here who
2 will be speaking about the Army Corps' process
3 associated with this project.

4 This is a very unique situation. I can't
5 honestly think of any joint EIR/EIS's that have been
6 prepared in the region by a local agency and the
7 Corps of Engineers. This is a very special and
8 unique situation that the City entered into and is
9 actually going to help the consideration and the
10 subsequent development of Rio del Oro once it
11 receives its entitlements.

12 So tonight the purpose is to basically
13 describe the roles of the City and the Army Corps on
14 consideration of this project, provide an overview
15 of the contents of the Draft EIR/EIS and provide an
16 opportunity for the public and interested agencies
17 to provide comments regarding the adequacy and the
18 analysis of the EIR/EIS.

19 One thing I need to note is we are not taking
20 any action or considering the Specific Plan or the
21 Draft EIR/EIS tonight. This is simply an
22 opportunity for people to voice their comments
23 regarding the environmental analysis.

24 This is a figure showing -- I actually skipped
25 a slide. This provides a very basic overview of the

1 proposed Rio del Oro Specific Plan. If you are
2 interested in the additional details, as I said
3 before, actually Pam Johns is available here, and
4 she is the Project Planner on the project.

5 It consists of the proposed Specific Plan.
6 The Rio del Oro planning area is designated by the
7 General Plan. It consists of mixed land uses:
8 residential, commercial, industrial, open space,
9 parks, et cetera. Build-out of the project will
10 bring 11,601 dwelling units to the City, and Phase 1
11 is actually being processed, which is the Elliott
12 portion we'll talk about later. For project level
13 entitlements they are looking for tentative map
14 requests.

15 This is a site location map. This is Sunrise.
16 This is Douglas. This is White Rock Road.

17 So, as you can see from the image, and this is
18 city limits, this is a substantial piece of land.
19 It is over 3,800 acres in size. To give you some
20 perspective of size, it is comparable to downtown
21 Sacramento and generally bounded by Interstate 80,
22 I-5 and the river. So we are talking about a rather
23 substantial area of the City that we are looking for
24 the proposed Specific Plan on.

25 The following series of slides is a kind of a

1 visual overview of what the project site currently
2 looks like in its current state. So it's actually
3 going to start running some pictures of the various
4 features. These are some of the test rocket
5 facilities. You will see letters come up that are
6 identification of where the pictures were taken.

7 MR. JUNKER: Big project.

8 MR. ANGELL: Very big project.

9 This is an image of the proposed Specific
10 Plan. For reference, this is Sunrise Boulevard.
11 This is Douglas. This is existing Security Park.
12 This is White Rock Road. This is the proposed
13 alignment for Rancho Cordova Parkway. This is the
14 proposed alignment for Americanos. This is Morrison
15 Creek. This area here is the proposed wetland
16 preserve consisting of approximately 507 acres.

17 One of the unique things when you are doing a
18 joint EIR/EIS is alternatives analysis is a bit more
19 expansive that you would typically see normal
20 environmental documents. This document contains
21 four alternatives in addition to the applicant's
22 proposed development plan. There is a high density
23 alternative, an impact minimization alternative, no
24 federal action alternative which is a site plan that
25 would not require a wetland field permit from the

1 U.S. Army Corps of Engineers, and a no project
2 alternative that would retain the project in its
3 current condition.

4 The requested entitlements. This is a
5 summary. It is the adoption and implementation of
6 the specific plan, adoption of a public facilities
7 financing plan, adoption of an infrastructure plan
8 as well as approval of Phase 1 tentative subdivision
9 maps which -- quickly go back. Phase 1, which is
10 the Elliott portion, is right here. And approval of
11 a development agreement.

12 U.S. Army Corps of Engineers is -- there is a
13 submittal by the applicants to obtain a wetland
14 field permit for 30.33 acres of waters of the U.S.

15 At this point I'm going to hand it over to
16 Anna Sutton who will speak up front. She will
17 provide a little more description of the Corps' owes
18 process.

19 MS. SUTTON: I am Anna Sutton with the
20 Army Corps of Engineers. Patrick asked me tonight
21 to discuss a little bit of our part in this project.

22 The Corps of Engineers, we have jurisdiction
23 over waters of the United States. Waters of the
24 United States include navigable waters such as
25 Sacramento River, tributaries to it and wetlands.

1 You know you are in a water of the United States
2 when you have ordinary high mark, ordinary high
3 water mark. We take jurisdiction of waters below
4 that and wetland boundaries. You are familiar with
5 a lot of the wetlands such as vernal pools. There
6 is a distinct boundary, and we have jurisdiction
7 over those.

8 Also, as Patrick was talking about before,
9 there are a lot of alternatives. The reason that we
10 look at these alternatives is we have to make an
11 alternatives analysis that arrives at the least
12 environmentally damaging, practicable alternative.
13 And the project must comply with this. It is a
14 federal mandate. Not only does it have to comply,
15 we also have to ensure it does not contribute to
16 significant degradation of waters of the United
17 States and the project will use appropriate
18 mitigation to help bring the project down to less
19 than significant effect.

20 Thank you.

21 COMMISSIONER SAVORN: Do you make a
22 distinction between waters that have simply filled
23 in over the years into some of these dredge tailings
24 and all of a sudden they become strip mine pools?
25 Is that considered waters of the United States?

1 MS. SUTTON: Waters of the United States,
2 for pools like that would have to possess the
3 criteria for being a wetland or the ordinary high
4 marks. Wetlands have to have hydric pools,
5 hydrophytic plants and also maintain hydrology.
6 Wetlands have to be adjacent to one of those other
7 streams, tributaries or the like. So on a
8 case-by-case basis we evaluate each one to see if
9 there is that contributing water to the those
10 streams.

11 CHAIR VANCE: If it is an isolated pool
12 someplace that would never have any connection to
13 the runoff, then you do not get involved.

14 MS. SUTTON: Generally not. There are
15 circumstances where you can. If it contributes, we
16 have on there that it doesn't contribute to -- it is
17 not on here. But I think it is on the previous
18 slide where it discusses which are waters of the
19 United States, and it says that the destruction of
20 which could affect interstate commerce. So if there
21 was a reason that that wetland or that pool or
22 whatever was contributing to some type of interstate
23 commerce, then it would.

24 COMMISSIONER SAVORN: Most of that area we
25 are talking about you have the wetlands,

1 approximately 500-some acres around Security Park,
2 and then the rest of this area is huge dredge
3 tailings, if you'd just look right there. Dredge
4 tailing areas, quite easily over 60, 70 years of
5 accumulated water just by raining and what-have-you.

6 So there is not going to be a problem for
7 Elliott in their construction to go in there and
8 just simply bulldoze over or fill in where these
9 drainage pools are, is there?

10 MS. SUTTON: There were 30-some odd acres
11 of jurisdictional waters of the U.S., what we
12 consider the stream and adjacent wetlands. There
13 were also --

14 Patrick, do you remember how many isolated?

15 MR. ANGELL: Not off the top of my head.
16 In regards to the area of drainage, the waters of
17 the U.S., generally speaking, are primarily located
18 in the southern portion of the site. Basically, the
19 area that has not been dredged. Vast majority of
20 them are here and a vast majority of the impact is
21 there. There are a couple up here where it wasn't
22 dredge as well.

23 Water features that are identified up here in
24 the dredge tailings are not considered
25 jurisdictional. The Army Corps of Engineers

1 reviewed what is defined as a wetlands delineation
2 report that determined that features out here were
3 not subject to their jurisdiction. So filling those
4 aren't part of the Corps permit. The Corps permit
5 is primarily associated with the wetland feature
6 down here. These are the ones -- and, Anna, correct
7 me if I am wrong -- basically have hydrologic
8 connection to Morrison Creek, which is right here.
9 That is why the preserve is proposed to be right
10 here.

11 CHAIR VANCE: Are there any other
12 questions for Ms. Sutton?

13 Thank you.

14 MS. SUTTON: Thank you.

15 MR. ANGELL: The following slide is a
16 side-by-side comparison of the environmental review
17 process that CEQA and NEPA both required and which
18 we are going through as part of the joint
19 environmental document.

20 Currently we are at this stage. We have the
21 joint Draft EIR/EIS out. We are in the public
22 review process, which for the state process is the
23 state clearing house, public review, NEPA, the
24 agency and public review.

25 The next step in the process, which I will

1 describe a little later, is response to comments and
2 then the consideration of approval processes. They
3 are identified -- they are very similar sorts of
4 processes. The nice thing about doing this jointly
5 is once the entitlement process and our approvals go
6 through, consideration of both the local entitlement
7 request and a field permit by the Army Corps of
8 Engineers can be done simultaneously. There isn't
9 any conflict between the two processes.

10 This comes out as good when it is on the
11 screen.

12 These are the environmental issue areas that
13 are addressed in the Draft EIR/EIS. Not to go down
14 them one by one. These are the typical sort of
15 issues you've seen before addressed in environmental
16 documents. They do address some federal
17 requirements. For example, up here you have noted
18 Environmental Justice, which is not something we
19 typically deal with here in the local process. It
20 is required in the federal process.

21 This is a summary list of significant
22 unavoidable impacts currently identified in the
23 Draft EIR/EIS. Land use is identified as an issue
24 because of some potential conflicts with state
25 school siting requirements that we can't determine

1 at this time until a more formal process is done for
2 many of the school sites in the subsequent phases of
3 the process. Public services, utilities,
4 environmental effects associated with water and
5 wastewater services, cultural resources. There is
6 one potential eligible site for the National
7 Register that could be damaged or have to be
8 destroyed as a result of the project. There are
9 biological resource impacts, primarily associated
10 with wetlands, special status species also that are
11 identified as significant unavoidable effect.

12 Visual resources in regards to the initial
13 transformation of the site. Traffic impacts, air
14 quality both in regard to temporary and long-term as
15 well as noise impacts.

16 COMMISSIONER KONARSKI: Can you give us
17 more detail on the impacts on -- if you could back
18 up one more slide, please -- the resources,
19 historical resources? What historical sites will be
20 damaged or altered?

21 MR. ANGELL: There is a site known as the
22 Sigma Site that was a test rocket site or test burn
23 site.

24 MR. HATCH: Uh-huh.

25 MR. ANGELL: That was evaluated by a

1 historic architect and identified features that were
2 considered potentially eligible for the National
3 Register. Given the size of this feature and given
4 its design, it is not something that could be easily
5 relocated. If you like we can go into further
6 detail in regards as to why that is. It is
7 primarily lots of concrete involved. It is a very
8 large site and it is in the alignment of Americanos.
9 There is no real easy way to avoid the facility.

10 COMMISSIONER SAVORN: I thought one time
11 during our G Pack meetings this came up and it was
12 the thought, at least as I recall, that Aerojet was
13 going to make it like a theme park or theme area to
14 recall a historical landmark in the City of Rancho
15 Cordova, and it was going to be preserved, some of
16 that area, because of the monumental steps with the
17 Apollo Program and test rockets.

18 So what you are saying, because of the
19 alignment of a road, that it could possibly be put
20 asunder?

21 MR. ANGELL: Let me go back to the area.
22 I can point you in the general vicinity where it is.
23 It's generally, if I remember, located roughly in
24 this area. There are several features described in
25 the Draft EIR/EIS identified with the historical

1 test operations. There is one identified here and
2 there is one here and some others as well.

3 There is one in particular over here that was
4 considered potentially eligible for the National
5 Register. Certainly, once we complete the
6 presentation, perhaps the applicant could come up
7 and speak toward some of the concepts of retaining
8 some of the test property features. I know it has
9 been discussed.

10 COMMISSIONER KONARSKI: On the second
11 question, on the education issues, could you explain
12 that in a little more detail, with the land use
13 issue?

14 MR. ANGELL: Let me go back to the land
15 use. These blue sites are identified -- these
16 schools. This is a joint high school middle school.
17 This is a series of elementary schools. The state,
18 that is the Department of Education, siting
19 requirements regarding placement of such new school
20 facilities, in regards to placement adjacent to or
21 in relation to where an airport is, hazardous
22 materials, power lines, et cetera.

23 What the Draft EIR/EIS has identified is, in
24 particular, these sites out here in the subsequent
25 phases where we are looking at them in a much more

1 program level, because there isn't a land detailed
2 lotting plan for this area yet, is that we are not
3 quite sure these sites ultimately would meet the
4 siting criteria. That will be done at a project
5 level sort of analysis.

6 So conservatively, we identified that there
7 could be some conflicts here.

8 COMMISSIONER SAVORN: Flight plans,
9 whatever, flights of approaching aircraft?

10 MR. ANGELL: The general criteria, you are
11 supposed to be two miles away from an airport for
12 school siting. If you would like to have further
13 discussion of that, the EIR/EIS consultant, EDAUS,
14 they could further elaborate on that.

15 COMMISSIONER KONARSKI: Basically, it is a
16 possible conflict down the road and just
17 highlighting points that could go as a problem?

18 MR. ANGELL: As conservative points for
19 the analysis.

20 COMMISSIONER BURKE: If a problem, the
21 school will be moved to a different area.

22 MR. ANGELL: Certainly would be location.

23 COMMISSIONER BURKE: They are not going to
24 cut the schools out?

25 MR. ANGELL: No.

1 MR. ANGELL: Any other questions regarding
2 significant unavoidable effects?

3 In regards to the next steps in the
4 environmental process, tonight's an opportunity
5 which we hope to get some comments on the adequacy
6 of the environmental analysis. The comment period
7 goes till February 5th. Certainly, after tonight
8 people interested in commenting can write letters,
9 send the City E-mails. The document is available on
10 the City's website as well as an E-mail link to send
11 comments via E-mail to the City. It is also
12 available here at City Hall as a hard copy to
13 review.

14 Then we will be required to respond to every
15 comment we receive in writing, and there will be a
16 subsequent additional meeting for consideration of
17 the final EIR/EIS as well as the Specific Plan, and
18 eventually you will be asked to make recommendation
19 to the City Council regarding both environmental
20 documents on the Specific Plan itself.

21 Again, our recommendation to the Planning
22 Commission is to open up the meeting to receive
23 comments on the adequacy of the analysis, close the
24 meeting and again no action to be taken on the Draft
25 EIR/EIS or the project at this point.

1 At this point I can answer any questions you
2 have in regards to the environmental process.

3 And thank you for your time.

4 CHAIR VANCE: First, any one of the
5 Commissioners want to make a statement?

6 COMMISSIONER CUMMINGS: I just had a
7 question about the commercial development that is
8 planned. I believe this would be to the east of the
9 Security Park. I have two questions about that.

10 Number one, what are the laws regarding having
11 an industrial park so close to the preserve and what
12 is the current function of the Security Park, if you
13 are aware of that?

14 MR. ANGELL: Currently, the Security Park
15 consists of -- which is right down here. Currently
16 consists of industrial uses, quite a few heavy, what
17 I guess you could define, heavy industrial uses.
18 They are proposing a similar industrial designation
19 adjacent to it, right here. Not commercial, it is
20 industrial.

21 In regards to location to the wetland
22 preserve, there are certain criteria that both the
23 Army Corps of Engineers and U.S. Fish & Wildlife
24 apply in regards to locating development within
25 proximity of wetlands. Generally speaking, they go

1 by the rule of a 250-foot buffer between a wetland
2 feature and any sort of disturbance. Once you get
3 within that buffer, then they start considering that
4 an indirect effect on the water feature.

5 Anna, you can correct me if I am wrong. There
6 is also some requirements in regards to how drainage
7 and access would work into the preserve. Generally,
8 the U.S. Fish & Wildlife is not going to want people
9 traipsing into the preserve, though the Specific
10 Plan does propose perimeter trails around the
11 preserve.

12 Does that answer your question?

13 COMMISSIONER CUMMINGS: I am concerned of
14 having that commercial feature, that industrial
15 feature, down the bottom there where you have single
16 family homes nearby and a preserve next to. I hope
17 that the applicant will take time to address that
18 concern that I have.

19 Thank you.

20 CHAIR VANCE: Is there anyone else?

21 I'm going to need to open. I guess we ask the
22 applicants to come up, and do you have anything that
23 you want to say? Who is your main speaker here?

24 MR. HATCH: Mr. Chairman, Commissioners,
25 David Hatch with GenCorp Realty Investments

1 representing GenCorp Aerojet this evening, half of
2 the applicant team. Obviously, Russ Davis from the
3 folks at Elliott Homes are also here if you have
4 some questions.

5 I didn't have anything obviously prepared for
6 presentation as the project is not being considered
7 before you tonight.

8 To answer a quick question that came up about
9 the potentially eligible historic resources.
10 Obviously, we are going to bring that back to you,
11 in front of the Planning Commission as well as the
12 City Council, as the project moves forward and the
13 details about those. I think Pat did an excellent
14 job of trying to encapsulate the issues surrounding.
15 Obviously, we are committed to, where we can,
16 documenting, conserving and preserving examples of
17 the wonderful history that has occurred on this
18 site. Aerojet didn't always own this site. It used
19 to be owned by McDonnell Douglas and Boeing Company.
20 I think when we come before you, have the
21 project considered and layout all the -- have some
22 photographic evidence for you, have experts who
23 actually analyzed the facility, that coupled with,
24 as Pat mentioned, the fact of where the Americanos
25 Road alignment and some other things that the plan

1 has to go and the nature of that facility, it is not
2 practical to pick that up and relocate it.
3 Obviously, the state, see if I get this right, the
4 State Office of Historic Preservation has guidelines
5 and criteria that you must follow, to chronicle and
6 document such features. We are obviously completely
7 willing to do that.

8 Mr. Savorn, you mentioned -- I am not aware of
9 any theme park in the plan. There is not one in
10 this Specific Plan. But we are obviously committed
11 and GenCorp is very deeply involved with the
12 aerospace museum here in the region. We look
13 forward to opportunities to be able to do that. We
14 have the simple fact that many of the structures
15 that Boeing had used and McDonnell Douglas had used
16 and Aerojet had used are not in the state, in a
17 condition or it is not possible to pick them up and
18 move them when you're talking about something that
19 might have several hundred thousand yards of
20 concrete. Hopefully, that -- you know, I made a
21 notation. When we come to the hearing, we will be
22 prepared to fully lay that out and explain the whys
23 and wherefores for you.

24 COMMISSIONER CUMMINGS: Perhaps even
25 moving parts of it. It seems that even some of

1 those larger structures, I don't know what condition
2 any of those are in. We can try to form a plan to
3 at least be able to move them to another location,
4 perhaps the aerospace museum or other location
5 throughout the city. The only piece of history that
6 we have in the city. It would be nice to try to
7 find a way to incorporate it rather than bulldoze
8 it.

9 MR. HATCH: We are certainly open to and
10 look for those opportunities. To date we haven't
11 been successful doing that. Certainly be able to
12 take another look and continue to look.

13 CHAIR VANCE: I had a question. A couple
14 places in our book here, get back to one of my pet
15 peeves that I have, I noticed that there were 16
16 acres set aside for the elderberry. Being the
17 elderberry beetle, the elderberry long-horn beetle
18 has been taken off the endangered list, would that
19 hopefully change or have the set aside --

20 MR. HATCH: Actually, Mr. Vance, the
21 beetle has not been taken off the endangered species
22 list. The U.S. Fish & Wildlife has recommended out
23 of the Sacramento office that it be delisted. It's
24 currently going through that process. There has not
25 been a final rule proposed, and I believe that will

1 happen in possibly another year time frame.

2 The fact of the matter, we're working closely
3 with Fish & Wildlife Service on the elderberry
4 mitigation. It will be part and parcel of this
5 plan. Speaking to many of the experts, some folks
6 believe it might be 18 months or two years. Some
7 folks think it might be three or five years before.
8 It is kind of an if-and-when question as to whether
9 or not that species actually comes off the
10 endangered species list. To date we have not
11 amended the plan.

12 CHAIR VANCE: Okay.

13 Any other questions?

14 COMMISSIONER SAVORN: I see that Mr. Davis
15 back there. Mr. Davis, would you mind coming to the
16 podium? I have a question I would like to ask since
17 this is an open meeting.

18 This EIR and this project that is going to be
19 opened to the public to comment on. This has been
20 going on for at least three years that I know of
21 since we were a city. Could you share with us what
22 we as a city or we as the Planning Commission or
23 Mr. Junker as the Planning Department Director, what
24 we can do to help bring this project to a positive,
25 forward moving project in a rapid way that would

1 facilitate your needs and facilitate our needs as a
2 city to move forward on this project since it has
3 been out there for a long time? What can we do to
4 help you?

5 MR. DAVIS: Well, actually, for the
6 record, Russ Davis with Elliott Homes. You are
7 actually doing it right now. Staff has done a great
8 job, I think, of getting this project ready for
9 hearing. What's taken a long time, we started --
10 Aerojet actually started in 1998 working on this
11 project. We subsequently got involved in 2001. It
12 was still in the county at the time. We began the
13 process with the county. Incorporation slowed the
14 process down somewhat as you might imagine and
15 appreciate. But since then the primary holdup has
16 been getting the EIR/EIS document ready for public
17 review. There has been a lot of -- I am sure
18 Ms. Sutton can attest that there have been a lot of
19 turnovers at Corps of Engineers. A lot of projects,
20 not very much staff to review them. And as a
21 result, getting the joint document reviewed by the
22 necessary agency and ready for public hearing is
23 what's taken all the time.

24 Now that we are actually into public review,
25 things should move pretty quickly. In fact, we are

1 meeting every other week with staff. We laid out a
2 schedule, and if we can keep to the schedule, we
3 will be -- should be at City Council for final
4 entitlements in July. If we can do that, that's
5 great. Because that theoretically could allow us to
6 start preliminary grading in the non wetland areas
7 by this summer. Our plan really is to be under
8 construction in 2008, serious construction, with
9 home occupancy in 2009.

10 The city has done a great job, I think, so far
11 in moving this project along. It's been forces
12 outside their control that has held it up.

13 Thank you for asking.

14 COMMISSIONER CUMMINGS: Mr. Davis, one
15 more thing. I'm also concerned about the industrial
16 park in the south area. I also noticed there is an
17 industrial, two industrial parks up near the green
18 belt. Can you address what sort of industries would
19 be in those?

20 MR. DAVIS: The diagonal purple swath in
21 the northwest area, that is actually the approach to
22 departure. This area in here, that is actually the
23 approach/departure pattern for Mather south runway.
24 So because of that, it cannot have any residential
25 uses. So we have designated it with the purple

1 color, which means really that it can either be
2 retail, office, industrial. As a practical matter,
3 the interest that has been shown thus far from
4 brokers to us is more light industrial, distribution
5 centers, those kind of uses. We have also in this
6 area in here, near the community park, we have
7 really have -- we envision this as being a real
8 mixed use type of development with office, retail,
9 recreation and all working together in a node.

10 And then these more outlying areas would be
11 more likely to be distribution, light industrial
12 uses, similar to what's along what is on the western
13 boundary. This down here next to Security Park, I
14 think that we designated that to be compatible with
15 the existing Security Park, so more or less as an
16 expansion of the kind of uses that are in Security
17 Park right now.

18 COMMISSIONER CUMMINGS: Have you
19 considered expanding the wetland preserve, for
20 example in the southeastern quadrant, to overtake
21 that industrial complex?

22 MR. DAVIS: We don't own it.

23 COMMISSIONER CUMMINGS: I am asking about
24 the corner one.

25 MR. DAVIS: Over there?

1 COMMISSIONER CUMMINGS: Yes, sir.

2 MR. DAVIS: Not really because there
3 aren't any wetland features over there.

4 COMMISSIONER CUMMINGS: My concern is that
5 you have industrial property next to single family
6 residents. And if you were to take a situation
7 which you have a recycling center or facility in
8 that area, you have homes that are pretty far away
9 and pretty insulated, pretty well insulated from
10 noise. Hopefully, these areas are going to remain,
11 and you will do what you can to quiet down the noise
12 and impacts that these single family residents and
13 green belt areas and preserve would no doubt come
14 under.

15 MR. HATCH: I apologize. I didn't cover
16 that when I came up before you. I think Russ made a
17 good point. When you see the purple on the map, you
18 should not think a hundred percent industrial. We
19 have designated it this color and MP. Clearly we
20 are well aware, in fact, have even worked in
21 coordination with the Enlar [phonetic] Company on
22 the north Douglas grading and gave them an easement,
23 worked with them on some drainage issues.

24 You have, obviously, Americanos that has to be
25 provided for. And from our view the area in white

1 and Security Park, the reason it is not part of the
2 plan is because we don't own it. In our view, from
3 a planning standpoint this has to be executed well.
4 It has to look good. It's not going to look --
5 while the uses and folks who might occupy business
6 there and things will be compatible with what the
7 existing Security Park looks like. It's not going
8 to be compatible on a visual basis, not even close.
9 We do intend to have some commercial/retail there as
10 well as a transitional buffer knowing the
11 development to the south and development to the
12 east.

13 COMMISSIONER CUMMINGS: Appreciate that.
14 Thank you.

15 MR. DAVIS: Although tonight's hearing is
16 really to take comments on the environmental
17 document, when the project actually comes before
18 you, there will be a number of other documents that
19 come with it, including design guidelines and
20 development standards. And those will kind of set
21 the ground rules for what all of the different land
22 uses can and cannot do, including that purple area
23 that David just addressed.

24 There is going to be many opportunities as
25 this project progresses over the next 20 to 30 years

1 to actually control what those land uses are going
2 to look like and how they are going to be compatible
3 with adjacent land uses.

4 COMMISSIONER SAVORN: I appreciate you
5 guys bringing commercial into this plan. Hopefully,
6 the people living here will not have to travel too
7 far to get to their places of work and maybe work
8 very closely to encourage people to not have to
9 drive so far to get to their jobs.

10 MR. DAVIS: When the project gets before
11 you, you will see that the project has been designed
12 to do just that.

13 CHAIR VANCE: Thank you.

14 Are there any other questions?

15 I do have one question, probably for the
16 staff. On the tables, on E52 or ES52, where it has
17 the park and recreation, it has listed down there
18 five acres per thousand. Wasn't this set up --
19 doesn't the City have a requirement of seven acres
20 per thousand and not five?

21 MR. JUNKER: The City has the standard of
22 five acres for parks per thousand. The City also
23 has the standard of various requirements for open
24 space. Some of those are based on specific acreage
25 amounts. And so we have a set of standards that are

1 generally mandatory open spaces and
2 performance-based open space. This project has been
3 going forward consistent with the policies contained
4 within the general plan.

5 CHAIR VANCE: So the five acres then would
6 suffice?

7 MR. JUNKER: Because of the other land
8 that would work in conjunction with the parks. The
9 parks expand, the open space expands the
10 functionality of the parks.

11 CHAIR VANCE: One other. Just in 3.914.
12 It's record eligible historic resources to historic
13 American buildings survey standard. What does the
14 solid propeller assembly area and the seismic test
15 area have to do with a historical site? Is it just
16 because this has been Aerojet for these years that
17 we are actually going to call it a historic site?

18 MR. ANGELL: As we discussed previously,
19 the site you made reference to, the Sigma test site
20 and the solids sites, they are over here. There was
21 a historic architect that was retained as part of
22 the EIR/EIS to look at whether or not we had any
23 features that were of cold war era or Apollo era
24 that would potentially fall into the National
25 Register. Of all the features those were the only

1 two that were identified that were eligible, that
2 would need mitigation.

3 CHAIR VANCE: Just a question that I
4 thought. To me history, I usually take it as
5 something that is older than I am. Nowadays gets a
6 little further down the road than it used to be.
7 That was just a question that I was wondering.

8 I do have a card here from somebody, Alex
9 MacDonald. I will open this back up.

10 MR. MACDONALD: My name is Alex MacDonald.
11 I am with the Regional Water Quality Control Board
12 here in Rancho Cordova. I am in the midst of
13 reviewing this rather thick document. Since you are
14 having this meeting tonight, I have a couple points
15 I want to bring up now until all my comments will be
16 coming in at the end. There are three major issues
17 that I think need to be covered in the EIR that are
18 basically lacking at this time.

19 The first issue I have is arsenic.
20 Concentration of arsenic on this site is three
21 orders of magnitude above what USEPA and the State
22 of California would say are safe levels. Not due to
23 Aerojet activities. Not due to Boeing activities,
24 but due to naturally occurring arsenic. The
25 document does not discuss this.

HEARING - 1

1 I am not saying that this site should not be
2 developed. I need -- the document should evaluate
3 the potential risk and determine if any mitigation
4 measures are needed. That is all I am saying. I'm
5 not saying you can't develop the property.
6 Obviously, the property south of that property, east
7 of that, same soils, have the same concentration of
8 arsenic. Nothing was ever considered at that time.
9 I just don't want to have the same situation like we
10 have in El Dorado Hills with asbestos, where you
11 build something and after the fact you find out
12 something. Maybe you should have done something
13 early on. Houses would be built anyway. Everybody
14 would have been satisfied ahead of time.

15 Second comment that I have is there is one
16 proposed use for recycled water in this facility,
17 and that is in the common areas, medians, common
18 spaces, landscape irrigation. I would recommend
19 that the whole site be -- there is a large demand
20 for reuse of water from Aerojet and Boeing
21 groundwater extraction treatment system readily used
22 for reclaimed water, and the Sacramento Regional
23 Wastewater Treatment Plant has a big demand for
24 recycled water, as much as they can. As they keep
25 growing, they have less and less dilution within the

HEARING - 1
cont.

HEARING - 2

1 Sacramento River and there is a big demand to get
2 rid of their water. Once the houses are built, they
3 are not going to come back and repipe it. If you
4 are going to do it cost-effectively, you do it up
5 front. That was my second recommendation.

6 The third major item I have --

7 COMMISSIONER KONARSKI: How cost
8 prohibitive is that, to purple pipe the whole area?

9 MR. MACDONALD: The cost of pipe is
10 basically doubling the cost, essentially, of the
11 water distribution system. So a second set of
12 pipes, not completely build, but a second set of
13 pipes to each of the houses has to be about the
14 same. You are doubling.

15 They have done this up in El Dorado Hills
16 where they've taken water from the wastewater
17 treatment plant there and reuse it. As we go
18 through the process, there is less and less water
19 available. Obviously, in the future as more and
20 more homes come in, in drought years water demands
21 will be much higher. At least these houses would
22 have the availability of using groundwater
23 extraction treatment plant water from Aerojet or
24 Boeing. Always have green lawns. Their neighbors
25 might not.

HEARING - 2
cont.

1 The third thing is there is two sources of
2 water for this project. One is short-term water
3 supply and one thing is long-term supply that is
4 coming from Sacramento County down the road 2010,
5 2011. You look at the document, there is what they
6 call gap water. How do we supply water to the
7 development in that interim period of time. They
8 have three sources of water for that. All come from
9 the Arden Cordova -- Golden State Water Company
10 which serves Rancho Cordova. Two of those three
11 sources probably are not viable. One of them is
12 groundwater extraction system from Aerojet.

13 I don't believe that the Department of Health
14 Services would permit use of that water for direct
15 potable purposes. The way the conditions are right
16 now, that waters goes to the American River, down
17 the Sacramento River, mixed all together, pulled
18 back in with all the other waters and brought back
19 in here with East Bay MUD and County of Sacramento
20 and distributed in that manner. That will fly, and
21 that is the long-term use.

22 Directly using that water now from the
23 groundwater extraction system I don't think is going
24 to be viable.

25 The second alternative they chose was

HEARING - 3

1 potentially use of existing water supply wells that
2 were turned off due to pollution. You provide
3 wellhead treatment on those and then serve them to
4 the public. I think that would be a stretch to
5 occur immediately. I know the existing community of
6 Rancho Cordova is very doubtful and is to be
7 fighting that same process if it is going to be
8 served to them. If you look at where the wells are,
9 they are in the older part of Rancho Cordova. In
10 fact, you put wellhead treatment on those wells and
11 try to serve it, you will actually be serving to the
12 older part of Rancho Cordova and not the newer part.
13 You are not going to pipe that water all the way
14 from those wells unmixed all the way down to the
15 development. What would happen is the water supply
16 on this side of the distribution system would come
17 to this area and the well water would be served over
18 there, who is already effected. I am sure
19 Mr. Latham [phonetic] has come several times before
20 this Commission on this issue.

21 Those are three major issues I had.

22 Mr. Savorn, you had a question on the wetlands
23 within the dredge tailings. There is 12.9 something
24 acres of those type of wetlands. I think the
25 project component has actually proposed mitigating

HEARING - 3
cont.

1 those wetlands, anyway. Even though they are not
2 under the Army Corps of Engineers' jurisdiction,
3 they fall under waters of the state and need to be
4 mitigated, and I think this is all taken care in the
5 plan. There will be marshes and they will be filled
6 in with no problem.

7 Any other questions?

8 CHAIR VANCE: Thank you, Mr. MacDonald.
9 The other speaker that I have here is Alta
10 Tura.

11 MS. TURA: I am Alta Tura, and I am
12 representing Habitat 2020. It is a committee of
13 environmental organizations in Sacramento County.
14 We will be preparing a comment letter. I just
15 wanted to mention a few things tonight briefly.

16 We are concerned about the toxics. And when
17 you look at the hazardous materials section and then
18 you look at this, the map, it is hard to figure out
19 what land use is being proposed for each of those
20 sites that have hazardous materials and that are
21 going to be cleaned up. And it would be very useful
22 if that could be shown in the environmental document
23 for each -- for the toxic sites, what land use is
24 being proposed for that site and at what phase that
25 use would be expected to occur.

HEARING - 4

1 Water supply. We have some questions about
2 using that remediated groundwater and who would be
3 getting it if it was used and how would they be
4 impacted by that. Because if it is people that were
5 already exposed to contaminants in the water before
6 it was all discovered, if they get subjected to
7 treated groundwater, having to use that for their
8 drinking water.

9 The wetland preserve, we have concerns about a
10 six-lane road going through the preserve and the
11 culverts, the effectiveness of those for mitigation
12 for the roadway. So we will be commenting about
13 that more fully in our letter. And we need to look
14 more closely at the hydrology and storm water
15 drainage. Just as an example, Anatolia, their new
16 homes that have flooded and Laguna Creek crossed
17 over its watershed into the Morrison Creek
18 watershed. So we would like clear evidence that we
19 have a better analysis here and better storm water
20 drainage plan than what happened for Anatolia.

21 So thank you very much.

22 CHAIR VANCE: Thank you.

23 Were there any other comments that we had?

24 Okay. Then I will close the public hearing.

25 Thank you, Patrick, and you didn't have to

HEARING - 5

HEARING - 6

HEARING - 7

1 call on Pam.

2 MR. ANGELL: No, I did not.

3 Thank you, Commissioners.

4 I just wanted to repeat again for the audience
5 that the comment period ends on February 5th, and
6 your comments can be provided in the writing sheets
7 in the back and you can respond by or comment by
8 sending E-mail through the City's website.

9 (Meeting concluded at 7:30 p.m.)

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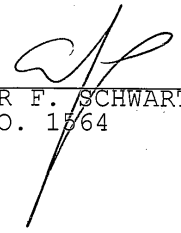
REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)
) ss.
COUNTY OF SACRAMENTO)

I, ESTHER F. SCHWARTZ, certify that I was the official Court Reporter for the proceedings named herein, and that as such reporter, I reported in verbatim shorthand writing those proceedings;

That I thereafter caused my shorthand writing to be reduced to printed format, and the pages numbered 3 through 38 herein constitute a complete, true and correct record of the proceedings.

IN WITNESS WHEREOF, I have subscribed this certificate at Sacramento, California, on this 14th day of January, 2007.



ESTHER F. SCHWARTZ
CSR NO. 1564

Hearing-1

The comment suggests that the 2006 DEIR/DEIS should evaluate the potential risks associated with arsenic, although the high levels of arsenic are naturally occurring, and determine whether mitigation measures are needed to prevent human health problems.

Please see response to comment CVRWQCB-1-1

Hearing-2

The comment recommends that the project use recycled water in common areas, medians, and landscape irrigation.

The project includes a recycled water plan (*Non-Potable Water Master Plan* [Wood Rodgers, February 2007]). See response to comment CVRWQCB-1-11 regarding areas identified to be served by nonpotable water. Please also see Section 3.5, “Utilities and Service Systems—Water Supply,” in the 2008 RDEIR/SDEIS.

Hearing-3

The comment questions the reliability of water sources for the Rio del Oro project as described in the 2006 DEIR/DEIS.

Please see Section 3.5, “Utilities and Service Systems—Water Supply,” of the 2008 RDEIR/SDEIS, which was prepared in compliance with the California Supreme Court’s direction in the *Vineyard* case and addresses the concerns raised by the commenter. See also responses CVRWQCB-2 and CVRWQCB-6.

Hearing-4

The comment requests that the environmental document include a map showing toxic sites in the specific plan area, what land use is being proposed for each site, and the phase at which that use would be expected to occur.

The information requested by the commenter is contained in 2006 DEIR/DEIS Exhibits 2-4 and 3.13-1.

Hearing-5

Commenter expresses concern over the use of remediated groundwater and the impact of this water on users. The remediated water is planned for use at the Rio del Oro Specific Plan area only and has been determined to be a reliable source of potable drinking water.

The remediated water, or GET water, is planned for use on Aerojet lands, including Rio del Oro, has been determined to be a reliable source of potable drinking water. (See Master Response 1, “Adequacy of Long-Term Water Supply,” in Chapter 3 of this FEIR/FEIS and Section 3.5, “Utilities and Service Systems—Water Supply,” of the 2008 RDEIR/SDEIS.)

Hearing-6

The comment expresses concerns about a six-lane road going through the proposed preserve and the effectiveness of culverts as mitigation for the roadway.

See responses to comments USFWS-1 and USFWS-10 and Mitigation Measure 3.10-1b of the 2008 RDEIR/SDEIS.

Hearing-7

The comment states that the project’s hydrology and storm water drainage elements should be examined more closely, citing the flooding of new homes in the Anatolia area.

The County Department of Water Resources developed a report addressing the flooding problems that occurred in January 2006 (*Flood Review Report for Anatolia II Subdivision, City of Rancho Cordova*, prepared by Sacramento County Department of Water Resources, January 2006). This report states “Water Resources has concluded that the subject flooding occurred in the Anatolia area because of construction activity and temporary construction design.” The Anatolia flooding problem was due to construction issues and was not a design issue.

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