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## **Appendix B**

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## County of Sacramento

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October 31, 2019

Kelly Whitman  
Planning Department  
City of Rancho Cordova  
2729 Prospect Park Drive  
Rancho Cordova, CA 95670

**SUBJECT: COMMENTS ON THE NOTICE OF PREPARATION (NOP) FOR THE PRESERVE ENVIRONMENTAL IMPACT REPORT (EIR)**

Ms. Whitman:

The County of Sacramento, Department of Transportation has reviewed the NOP for the subject project. We appreciate the opportunity to review these documents.

Our comments are simply that we would expect that if this project has any impacts on the transportation facilities in the County of Sacramento that mitigation measures be included in the EIR that address these impacts. To that end we would request that any county roadways that would experience increased traffic volumes from the development be studied in the EIR. In looking at the plan there appears to be the potential for traffic to come from the proposed project through Raymer Road at Grant Line Road and White Rock Road. We have the following comments to offer at this time.

1. The traffic study for the EIR should evaluate the traffic impacts on the following roadway segments:
  - White Rock Road West of Grant Line Road
  - White Rock Road North of Grant Line Road
  - Grant Line Road North of Raymer Road
  - Grant Line Road South of Raymer Road
2. The following intersections should also be evaluated in the study during the weekday AM and PM peak hour:
  - Grant Line Road and White Rock Road
  - Grant Line Road and Raymer Road
  - Grant Line Road and Douglas Road

Should you have any questions, please feel free to contact me at (916) 874-7052.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew G. Darrow", is written over a horizontal line.

Matthew G. Darrow, PE, TE, PTOE.  
Principal Civil Engineer  
Department of Transportation

MGD/mp



November 18, 2019

Darcy Goulart  
City of Rancho Cordova Planning Department  
2729 Prospect Park Dr.  
Rancho Cordova, CA 95670

**Regarding: Notice of Preparation regarding an Environmental Impact Report  
The Preserve Tentative Subdivision Map (June 10, 2019)  
Comment Period: October 25 – November 25  
Grant Line West Planning Area  
Rancho Cordova, CA**

Reviewed by: Cordova Recreation and Park District  
Laura Taylor, CRPD Park Planning and Development Manager  
Lisbet Gullone, CRPD Contract Planner

As a part of the entitlement process for The Preserve Tentative Subdivision Map, the City of Rancho Cordova circulated a Notice of Preparation regarding an Environmental Impact Report on October 25, 2019. The Cordova Recreation and Park District (CRPD or 'the District') has previously prepared project review comments in a letter dated March 15, 2019 and met with the project team on February 21 and October 17, 2019.

## **BACKGROUND**

After CRPD reviewed the project for Quimby Parkland requirements in May of this year, the application was on hold until the City could determine if the previously planned extension of Centennial Drive (through the northeast corner of the Parkway development) would remain an option. This issue has now been resolved. The City will no longer pursue a road extension through the future open space preserve north of the subdivision.

*The Preserve Project Initial Study* dated October 2019 contains outdated statistics about the Cordova Recreation and Park District (CRPD) on page 47. The name of the District needs to be corrected in paragraph one. The District currently has 39 parks (10 community parks and 29 neighborhood parks). CRPD also has a golf course, two swimming pools (one is currently being replaced), a senior center and the Mather Sports Complex that includes a gymnasium. CRPD no longer has a shooting center.

## **TENTATIVE SUBDIVISION MAP**

The Preserve subdivision includes 434 single family units and will have a future population of 1,280 individuals (434 x 2.95). The community is required to provide 6.4 acres of Quimby Parkland (5 acres per 1,000 residents), but as shown in the Park Exhibit, the two parks that are designated to CRPD have a combined area of 10.37 acres. CRPD has also noted that the park area is specified as 8.9 acres on page 8 of the NOP.

The current project proposal exceeds the Quimby parkland dedication requirement. The District's acceptance of additional acreage requires an increase to existing funding models for the development and maintenance of the additional park acreage.

The District has met with the applicant to discuss the latest Tentative Map and Park Exhibit (dated June 10, 2019), but written review comments have not yet been prepared. While the proposed Quimby parks are not consistent with CRPD's regular standards regarding size and location, the District is open to some deviations to be approved by the District's General Manager and ultimately the Board of Directors through the mechanism of a Park Development Agreement.

At this time, several options are under consideration. CRPD may consider the larger park in the northeast corner of the subdivision (Park 1) a Community Park and the smaller park at the center of the open space/park corridor (Park 2) a Neighborhood Park. The City of Rancho Cordova staff and CRPD staff have begun discussions about the concept of a trailhead at Park 1 Community Park site to access the proposed trail system. The jurisdictional issues related to City trails and CRPD Quimby parkland have not been detailed should the two agencies pursue a trailhead facility.

### **ACCESS AND CIRCULATION**

District standards state that neighborhood parks should have street frontage on three sides and community parks should have street frontage on two sides. The proposed park layout does not conform to this standard and causes some concern for access, visibility and potential security issues. The District has considered mitigation measures for the access issues created by the non-conformance, suggested below.

The two proposed parks are incorporated with the park/open space corridor close to Morrison Creek, CRPD would like to improve public access to and increase the visibility of the park sites by locating the main loop road (from the North Douglas Neighborhood to Raymer Way) next to Park 2. As a part of this change, Street H would become the main entrance from Raymer Way (in lieu of Street A). In order to further increase the visibility of the two parks, CRPD would also like to place park signs along the assigned loop road.

The proposed trail along Morrison Creek will need to provide access for large maintenance and emergency vehicles. The trail corridor and associated cable fencing along the creek will need to be located in an easement that is separate from the Quimby park sites.

The trail system within The Preserve was presented as connecting to the City of Rancho Cordova trail system. However, adjustments will need to be made to this project proposal and to approved plans for offsite properties to connect the trail system in this project to the City trail system. Because a creek trail was originally envisioned to extend from the west boundary of the Preserve to Americanos Boulevard (along the north side of Morrison Creek), CRPD recommends that the trail within the Preserve (along the south side of Morrison Creek) should extend up to the west subdivision boundary. From this location, a future trail could be extended west through a portion of Rio Del Oro Specific Plan area to Americanos Boulevard. By moving the trail from the north side of the creek, the main part of the wetlands preserve can also remain undisturbed.

Demonstrated ability to connect The Preserve trail system to the larger City system is needed to justify the concept of a trailhead at Park 1 Community Park site.

## **OPEN SPACE/RECREATION**

It is the goal of CRPD to provide an average of 5 acres of improved parkland per 1,000 residents. In addition, the District strives to provide 52% Community Parks and 48% of Neighborhood Parks. It will not be possible to apply these standards to The Preserve. However, CRPD can direct the applicant towards closer compliance. A community asset trailhead area and a parking lot and restroom to service trailhead use (possibly under the jurisdiction of the City of Rancho Cordova) could be set aside in or adjacent to Park 1. This will steer the project towards closer compliance. The location of Park 1 at the end of the subdivision roadway system complicate vehicular access to Park 1 from the broader community. These complications could impact the use of Park 1 as a community park.

The grading plan for Park 2 has significant slopes within the parcel boundary. The slopes reduce the programmable space available and excludes the possibility of off-street parking for this park. Therefore, it can only be considered for neighborhood park use. The grading plan for the Park 1 parcel has significant slopes on the northern portion of the project. These will be difficult to monitor and maintain. CRPD would prefer not to accept maintenance of the slopes off the back side of the park that do not provide a public park use benefit.

CRPD does not consider slopes that exceed 25% (4:1) as Quimby Parkland. The current park sizes shown on the maps should distinguish between that creditable as Quimby parkland (4:1 or less) and portions exceeding 4:1 slope.

Because each park site has a limited amount of street frontage, CRPD recommends that parking should be permitted on each side of streets that front park land, especially for Park 2. As a part of the District's standards, vertical curbs and attached sidewalks are also required for street frontages along park sites.

## **UTILITIES**

Both park sites will need to be provided with standard utility stubs required for park development. CRPD requested the applicant investigate if a gravity-flow sewer line can serve Park 2.

## **POTENTIAL ENVIRONMENTAL EFFECTS**

CRPD recommends that sport field lighting, pedestrian and parking lot lighting, noise, and increased traffic associated with public parks should be considered in the future environmental study. The impacts of Park 1 should consider potential impacts of actively-programmed community parks with the potential for community park amenities.

The environmental study shall also identify soil types, wetlands and biological resources on land designated for parks. If unsuitable soils, wetlands or protected plants and animals are impacting park land, the EIR shall identify appropriate mitigation measures for the removal.

## **PARK DEVELOPMENT AGREEMENT**

As a part of the process to identify a final park system for the Preserve, a Park Development Agreement between the developer and CRPD will be required. If the park system and trail system plan have jurisdictional issues related to trail easements, maintenance, ownership related to a trailhead, parking lot and restroom those issues will be described in a Park Development Agreement and further detailed in an agreement between the City and the Park District.

## **RECOMMENDATIONS REGARDING THE ENVIRONMENTAL IMPACT REPORT**

The Environmental Impact Report for the Preserve should address the following issues:

1. Consider vehicular access to the proposed Park 1 site from the broader community. Improve vehicular access to the Park 1. Consider the option that the main east entrance to the subdivision could be moved from Street A to Street H and Street H could be designated as the wider loop road through the neighborhood. Ideally, the higher volume traffic road should front the proposed community park.
2. Specify that the trail along the south side of Morrison Creek will be designed to accommodate emergency vehicles.
3. Extend the proposed trail to the west subdivision boundary and demonstrate connection to the City-wide Trail System.
4. Suggest erosion control measures for new slopes that are steeper than 4:1 (0.25%).
5. Address lighting, noise, and increased traffic associated with public parks.
6. Identify soil types, wetlands and biological resources on land designated for parks and develop mitigation measures for the removal of unsuitable soils, wetlands or protected plants and animals.

Please contact the District if you have any questions or comments regarding these recommendations.

Respectfully,

Laura L Taylor ASLA  
Park Planning and Development Manager  
Cordova Recreation and Park District

Copy: Patrick Larkin, General Manager for Cordova Recreation and Park District  
Bob Shattuck, Shattuck Community Planning  
Cristina James, CPRD Landscape Architect

**Department of Waste Management  
and Recycling**

Doug Sloan, Director



**County of Sacramento**

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Date: November 19, 2019

To: Darcy Goulart, City of Rancho Cordova Planning Department

From: Dave Ghirardelli, County of Sacramento Department of Waste Management & Recycling  
(DWMR)

**SUBJECT: DWMR Comments on The Preserve Environmental Impact Report (EIR)  
Notice of Preparation (NOP)**

Please find below DWMR's comments regarding The Preserve EIR NOP.

Sacramento County's Kiefer Landfill serves the waste disposal needs of residents and businesses throughout Sacramento County and the cities within it. Kiefer Landfill is located approximately three miles from The Preserve. The proximity and pre-existence of Kiefer Landfill and the important role it plays in the Sacramento region should be considered during development of the EIR. DWMR can provide detailed and current information for relevant Sections of the EIR and the City of Rancho Cordova is invited to inquire, specifically when authoring the Land Use chapter, Public Services and Utilities chapter, and the Transportation chapter, among others.

In order to maintain service for citizens and businesses throughout the County, parcels created within The Preserve should be accompanied by Disclosures recorded on deeds acknowledging the pre-existence and proximity of Kiefer Landfill and the waste disposal activities that occur there. Sample disclosures can be provided by DWMR upon request.

Please do not hesitate to contact me if you have any questions or need additional clarification on any points made above. Also, please keep me updated regarding The Preserve as the application process for the project entitlements proceeds.

My contact information is below:

Dave Ghirardelli  
Solid Waste Planner II  
County of Sacramento  
Department of Waste Management & Recycling  
(916) 875-4557  
[ghirardellid@sacounty.net](mailto:ghirardellid@sacounty.net)

**Department of Waste Management  
and Recycling**

Doug Sloan, Director



**County of Sacramento**

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*Sent Via E-Mail*

November 20, 2019

Darcy Goulart, Planning Manager  
City of Rancho Cordova  
Community Development Department  
2729 Prospect Park Drive  
Rancho Cordova, CA 95670  
[dgoulart@cityofranhocordova.org](mailto:dgoulart@cityofranhocordova.org)

**Subject: The Preserve Project / NOP / 2019100515**

Dear Ms. Goulart:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for The Preserve Project (Project, SCH 2019100515). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the Project NOP will acknowledge any Project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on [smud.org](http://smud.org) for more information regarding transmission encroachment:
  - <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
  - <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery
- The potential need to relocate and or remove any SMUD infrastructure that may be affected in or around the project area

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this NOP. If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Jerry Park, at [jerry.park@smud.org](mailto:jerry.park@smud.org) or 916.732.7406.

Sincerely,

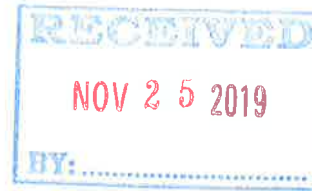
A handwritten signature in blue ink that reads "Nicole Goi".

Nicole Goi  
Regional & Local Government Affairs  
Sacramento Municipal Utility District  
6301 S Street, Mail Stop A313  
Sacramento, CA 95817  
[nicole.goi@smud.org](mailto:nicole.goi@smud.org)

Cc: Jerry Park

**DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**

East Sacramento Area  
11336 Trade Center Drive  
Rancho Cordova, CA 95742  
(916) 464-1450  
(800) 735-2929 (TT/TDD)  
(800) 735-2922 (Voice)



November 21, 2019

File No.: 260.15702

Darcy Goulart  
City of Rancho Cordova  
2729 Prospect Park Drive  
Rancho Cordova, CA 95670

The East Sacramento Area Office of the California Highway Patrol recently received a “Notice of Preparation,” Environmental Impact Report for the proposed Preserve Project in the City of Rancho Cordova, State Clearing House (SCH) #2019100515. After our review, we have concerns with the potential impact this project could have on traffic congestion, and an increase in calls for service within our jurisdiction.

The actual proposed community is within the Rancho Cordova City limits, but the ingress and egress routes are within the jurisdiction of the California Highway Patrol, East Sacramento Area’s jurisdiction. Our concerns relate to the proposed construction of a master planned community to include 434 residential units on 71.58 acres, and public parks on 26.12 acres. This project is located north of Grantline Road, south of Sunrise Boulevard between Prairie City Road and Jackson Road. There are several major roadways that will be impacted by the increased traffic congestion. Jackson Road, State Route 16 (SR-16), is a two-lane undivided highway with minimal shoulders, surrounded by agricultural fields. SR-16 already experiences significant traffic delays/congestion during commute hours and heavy commercial vehicle traffic due to the commercial businesses within the area and the County Landfill. These roads are also used as a major commuter thoroughfare for Amador County, and numerous communities within Sacramento, San Joaquin, and El Dorado Counties. SR-16, Sunrise Boulevard, White Rock Road, Prairie City Road and Grantline Road are roadways within our jurisdiction that are significant ingress and egress routes that will be used to access the proposed community from both US Highway 50 and State Route 99 (SR-99). There are numerous cross streets within the vicinity of the planned project that will also see an increase in traffic congestion.

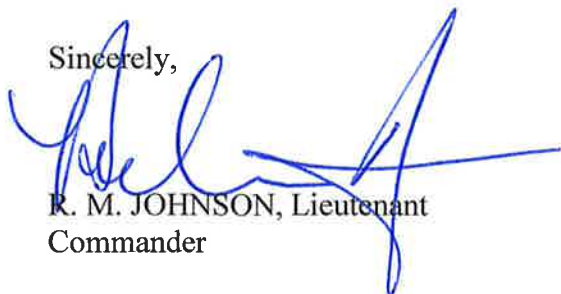
The aforementioned roadways currently experience traffic congestion and significant delays during commute hours, and without proper traffic management engineering prior to the development of the proposed community, traffic congestion will continue to increase. All of the roadways mentioned are two lane roadways that were originally developed for a rural community and were not designed to accommodate the rapid increase in population. This



project will negatively impact our operations due to the increased traffic congestion, which will lead to an increase in traffic collisions, calls for service, and ultimately will significantly increase our response time. The mission of the California Highway Patrol is to provide the highest level of Safety, Service and Security. The delays in service due to the traffic congestion will impact our ability to provide the service the citizens deserve.

If you have any questions regarding these concerns, please contact Lieutenant Johnson at (916) 464-1450.

Sincerely,



R. M. JOHNSON, Lieutenant  
Commander

cc: State Clearing House  
Valley Division  
Special Projects Section

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## Central Valley Regional Water Quality Control Board

22 November 2019

Darcy Goulart  
City of Rancho Cordova  
2729 Prospect Park Drive  
Rancho Cordova, CA 95670

**CERTIFIED MAIL**  
7019 0700 0002 0111 5886

### **COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, THE PRESERVE PROJECT, SCH#2019100515, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 25 October 2019 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Preserve Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

The project is located within the South Sacramento Habitat Conservation Plan (SSHCP) boundary. The project must implement all applicable SSHCP Avoidance and Minimization Measures.

#### **I. Regulatory Setting**

##### **Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically

KARL E. LONGLEY SCD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

### **Total Maximum Daily Load**

Morrison Creek is currently 303(d) listed for Diazinon, Pentachlorophenol (PCP), Pyrethroids, and Toxicity. Since the project contains tributaries to Morrison Creek, Central Valley Water Board staff recommends noting the current 303(d) listings for Morrison Creek within the draft Environmental Impact Report and discussing any potential any effects of these pollutants from project activities.

### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities

(Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

### **Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the

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<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers



seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2013-0145\\_res.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf)

#### **Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

#### **NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

<https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4812 or [Jordan.Hensley@waterboards.ca.gov](mailto:Jordan.Hensley@waterboards.ca.gov).

*Original Signed By*

Jordan Hensley  
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
Sacramento (via email)

November 25, 2019

**SENT VIA E-MAIL**

Darcy Goulart  
Principal Planner, City of Rancho Cordova  
2729 Prospect Park Drive, Rancho Cordova, California 95670

**Subject: The Preserve Initial Study and Notice of Preparation for a  
Draft Environmental Impact Report**

Dear Ms. Goulart,

Thank you for providing the opportunity for the Sacramento Metropolitan Air Quality Management District (SMAQMD) to review and comment on the Initial Study (IS) and Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for The Preserve. We have reviewed the project in a manner consistent with the California Health and Safety Code Section 40961 requirement that SMAQMD “represent all the citizens of the Sacramento District in influencing the decisions of other public and private agencies whose actions may have an adverse impact on air quality.” We offer the following comments.

#### **Thresholds & Analysis**

This project’s size exceeds SMAQMD’s screening threshold for construction analysis for both greenhouse gas (GHG) and criteria pollutant (pollutants covered by state and federal clean air acts) emissions. It exceeds SMAQMD’s screening threshold for operational analysis of GHG emissions. SMAQMD’s [Guide to Air Quality Assessment in Sacramento County](#) (CEQA Guide), available on our website, provides methods to analyze project air quality and climate change impacts, including screening criteria, thresholds of significance, and more, to assist lead agencies in complying with CEQA.

If the construction emissions of criteria pollutants and / or GHGs are determined to be significant, the City should require SMAQMD’s standard construction mitigation, available in the CEQA Guide. If operational GHG emissions are determined to be significant, the City should apply all feasible mitigation, as described in the CEQA Guide. Further, as the City of Rancho Cordova does not have a Climate Action Plan (CAP), please note that SMAQMD’s CEQA Guide contains guidance for addressing greenhouse gas emissions associated with individual development projects.

#### **Grant Line West Planning Area**

The planning area identified in the NOP does not include the entire Grant Line West planning area, and the DEIR should include context for the project within the Grant Line West planning area. This would include projected plans for land use in the rest of the Grant Line West planning area.

#### **Conclusion**

We look forward to receiving more project information through the environmental review process, so we can more fully evaluate this project for its effects on air quality. Thank you for

**The Preserve Initial Study and Notice of Preparation for a  
Draft Environmental Impact Report**

November 25, 2019

your consideration. All projects are subject to SMAQMD rules and regulations at the time of construction. [A list of the most common rules that apply at the construction phase of projects is available on our website.](#) If you have questions about these comments, please contact me at [mwright@airquality.org](mailto:mwright@airquality.org) or 916-874-4207

Sincerely,

A handwritten signature in cursive script that reads "Molly Wright".

Molly Wright, AICP  
Air Quality Planner / Analyst

c: Paul Philley, AICP, Program Coordinator, SMAQMD

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 3  
PLANNING DIVISION  
703 B Street, MS-4130  
Marysville CA 95901  
PHONE (530) 634-7616  
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*Making Conservation  
a California Way of Life.*

November 25, 2019

GTS# 03-SAC-2018-00566

Darcy Goulart  
City of Rancho Cordova  
2729 Prospect Park Drive  
Rancho Cordova, CA 95670

**The Preserve – Notice of Preparation (NOP) of an Environmental Impact Report**

Dear Darcy Goulart,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The applicant is proposing to rezone the property from Agriculture 80 and Industrial to Residential 5 (RD-5). The development includes 434 single family lots, parks, preserve area and all necessary infrastructure to support the project. The project applicant has submitted an arborist report, drainage study, sewer report, water study and aquatic resources delineation. Additional studies that are being prepared area biological resources assessment, traffic study, special-status plant surveys, raptor/bat survey and a geotechnical report. The site is located northwest of Raymer Way and Grant Line Road, north of the Sunridge Specific Plan and east of the Rio Del Oro Specific Plan. Based on the information received, Caltrans provides the following comments:

**Traffic Forecasting/Operations**

This project will have a significant impact to the US 50 interchanges, mainly to Sunrise, Prairie City, Zinfandel and Mather Road. We look forward to the opportunity to review the Traffic Impact Analysis (TIA) as referenced on page 13 of the NOP. Please incorporate the following points in the TIA:

- Trip generation table for each land use for the project including the land use code used and the units for those land uses.
- Trip distribution map
- Existing Traffic Volume
- Project Only Traffic Volume

Darcy Goulart  
City of Rancho Cordova  
November 25, 2019  
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- Existing Traffic Volume on Opening Day (Construction Completion Year)
- Existing Traffic Volume on Opening Day (Construction Completion Year) + Project Volume
- Cumulative 20-year traffic volume without project
- Cumulative 20-year traffic volume with project
- Analysis at the following interchanges:
  - US 50/Mather Field Road
  - US 50/Zinfandel Drive
  - US 50/Sunrise Blvd
  - US 50/Prairie City Road
- VMT Analysis for the project
- Suggested mitigation measures

Please provide our office with copies of any further actions regarding the Project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact David Smith at (530) 634-7799 or by email at: [david.j.smith@dot.ca.gov](mailto:david.j.smith@dot.ca.gov).

Sincerely,



DAVID SMITH  
Acting Branch Chief, Transportation Planning – South  
Planning, Local Assistance, and Sustainability