

APPENDIX P

PROJECT CONSISTENCY WITH CITY OF RANCHO CORDOVA BIOLOGICAL RESOURCES POLICIES

Table 3.10-1 Project Consistency with City of Rancho Cordova Biological Resources Policies		
General Plan Policies	Consistency	Analysis
<p>Policy OSPT.2.1 Review all proposals for new residential development to ensure compliance with the City's minimum open space standards.</p>	Yes	The City has not formally adopted minimum open space standards. However, the proposed project design is generally consistent with the City's draft minimum open space requirements. Specifically, Action Item 2.1.5 has been implemented throughout the proposed project site with the incorporation of greenbelts and landscape corridors. Prior to approval of the proposed project and after formal adoption of the minimum open space standards, a final consistency determination with this policy will be made by the City.
<p>Policy OSPT.2.3 Maximize the potential benefits of natural resource mitigation lands within urban development. (Further implemented through Actions OSPT.2.3.1 and OSPT.2.3.2)</p>	Yes	The wetland 507-acre preserve/mitigation bank in the southern portion of the project area not only provides mitigation but also a benefit to the visual quality for the site. Trails are planned along the perimeter of the preserve (outside the actual preserve area) in order to increase the aesthetic value of the preserve (See exhibit 2-13 of the Draft EIR/EIS for a description of the Bikeway and Trails Plan).
<p>Action OSPT.2.3.1: - Encourage projects to accomplish the following: Align roads and public spaces to take advantage of vistas over mitigation lands; Site publicly accessible trails adjacent to the boundaries of mitigation lands to take advantage of the open character and uninterrupted edge of the mitigation lands; and Consider locating public parks adjacent to mitigation lands to create a greater sense of open space and to take advantage of opportunities for vistas and trail connections.</p>	Yes	See Policy 2.3 discussion above. Also see Draft EIR-EIS Exhibit 2-13 for a description of the Bikeway and Trails Plan. Relating to locating parks in close proximity to mitigation lands, exhibit 2-4 of the EIR/EIS shows a large 54 acre private recreation area immediately adjacent to the 507 acre wetland preserve.
<p>Action OSPT.2.3.2 - Through the development review process, incorporate design features that increase visual access to natural resource mitigation lands.</p>	Yes	The 507 acre wetland preserve is surrounded by trails and roadways that will give a relatively unimpeded view of the wetland preserve. See Policy discussion 2.3 above.
<p>Policy NR.1.1 Protect rare, threatened, and endangered species and their habitats in accordance with State and federal law. (Further implemented through Actions NR.1.1.1 through NR.1.1.4)</p>	Yes, with Mitigation	<p>Federally listed vernal pool invertebrate species</p> <p>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</p>

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		<p>sufficiently protective by a qualified biologist with approval from USFWS), until a Biological Opinion (BO) has been issued by USFWS in accordance with the Endangered Species Act 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 (See mitigation measure 3.10-4).</p> <p>A revised draft wetland Mitigation Monitoring Program (MMP) was developed by ECORP Consulting in September 2007 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 B to the EIR, is subject to review and approval by the appropriate regulatory agencies and has not been approved as of the date of this document. The design of the project's on-site and off-site mitigation under the draft MMP will be required to be viable to support federally listed vernal pool invertebrate species. The on-site preserve is a large contiguous area –507-acres in the southern portion of the project site. The wetland preserve would consist of the highest quality and highest density vernal pools and seasonal wetlands in the project area. (See EIR/EIS Section 3.10) Wetland acreages within the wetland preserve that provide potential habitat for federally listed vernal pool invertebrates include 20.4 acres of existing vernal pools, 2.5 acres of seasonal wetland swale, 3.3 acres of seasonal wetland, and the creation of approximately 17.9 acres of vernal pools that would provide habitat. The watershed in the preserve is sufficient to provide needed hydrology for all the existing and created vernal pools in the preserve area. This conclusion is based on the site design of the project and the hydrologic analysis of a topographic model of the wetland preserve derived from Light Detection and Ranging (LiDAR)- technology. The LiDAR analysis concluded that the configuration of the preserve conserves almost 100% of the original watershed area and would not negatively impact the hydrologic function of the vernal pools.</p> <p>The proposed project's construction design would retain interconnections between on-site habitats by including measures to reduce interference with the hydrology that sustains vernal pools on-site. Within the proposed</p>

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		<p>preserve of the proposed project, no alterations would be made to Morrison Creek. Where Morrison Creek approaches the western boundary of the project site downstream from the preserve, the creek would be modified to provide for project drainage and to permit construction of a large overbank flood-detention area. (EIR/EIS, p. 2-21) The proposed preserve is already bisected by existing roadways and culverts and the proposed roadways do not result in fragmentation of the on-site preserve. Although new roadways (Americanos and Rancho Cordova Parkway) will be constructed through the wetland preserve, the project would include a special bridge design ("con-span") where these roadways cross Morrison Creek in the wetland preserve (Exhibits 3.10-4 and 3.10-5) and where the southern portion of Villagio Drive crosses Morrison Creek. (EIR/EIS, p. 2-22) These natural substrate span crossings would be sized to provide for wildlife movement (including invertebrate species that occur in the preserve) and minimize habitat fragmentation. Furthermore, the alignment and design of the roadways is consistent with policies in the Circulation Element and Land Use Element of the General Plan. These two roadways are shown in the General Plan as critical north-south arterials needed to relieve congestion along Sunrise Boulevard and their environmental impacts on biological resources were programmatically addressed in the Rancho Cordova General Plan EIR.</p> <p>Although connectivity to off-site habitat is not required under the policy, the project preserve connects to the proposed preserve area to the east. There is no possible physical interconnection from the proposed preserve area to preserve lands on adjacent properties to the west and south because existing roadways (Sunrise Boulevard and Douglas Road) and development create a barrier to connectivity. In addition, there are no existing or proposed preserves adjacent to the south or west of the project site. Connectivity of Morrison Creek will be maintained upstream and downstream.</p> <p>Valley Elderberry Longhorn Beetle (VELB)</p> <p>The EIR includes mitigation measure 3.10-4b to address impacts to the Valley Elderberry Longhorn Beetle (VELB). Mitigation measure 3.10-4b requires that prior to construction, the applicant shall obtain a Biological Opinion</p>

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		<p>(BO) from USFWS under the Endangered Species Act, and that the applicant abides by all provisions contained in the BO, including conservation and minimization measures. At a minimum, a “no-net-loss” of VELB habitat shall be achieved.</p> <p>Swainson’s Hawk</p> <p>Mitigation measure 3.10-4d included in Section 3.10 of this EIR would ensure that the proposed project would protect this species in accordance with State law. Mitigation measure 3.10-4d requires that the applicant shall preserve, to the satisfaction of the City, suitable Swainson’s hawk foraging habitat to ensure 1:1 mitigation of habitat value. Project impacts and proposed mitigation approach has been generally reviewed by the City and California Department of Fish and Game.</p> <p>Special Status Plants and Associated Habitat</p> <p>The EIR/EIS presents mitigation measure 3.10-5 to address impacts to the population of Greene’s legenera located on the project site. Mitigation measure 3.10-5 requires that a mitigation and monitoring plan be developed for Green’s legenera that maintains 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.</p>
<p>Action NR.1.1.1 - Incorporate large habitat preserves and interconnected wildlife corridors in new development areas to provide ample space for animal movement.</p>	<p>Yes, with Mitigation</p>	<p>The Project includes an on-site preserve that is a large area – 507-acres on the southern portion of the project site. Since the preserve is one nearly contiguous area, it provides on-site interconnections for invertebrate and other species.</p> <p>The roadways do not result in fragmentation of the on-site preserve. Although there will be new roads constructed through the wetland preserve, the project would include a special bridge design ("con-span") where the southern portion of Rancho Cordova Parkway crosses the wetland preserve and where the southern portion of Villagio Drive crosses Morrison Creek. (EIR/EIS, p. 2-22) Another con-span bridge would be constructed where Americanos Boulevard crosses Morrison Creek. (EIR/EIS, Exhibit 2-13). These natural substrate span crossings would provide for wildlife movement, including invertebrate species, and minimize habitat fragmentation. Bridge design</p>

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		<p>would include a large enough span area to provide movement corridors for terrestrial wildlife even during high flows (i.e., the entire span would not be inundated). Furthermore, the alignment and design of the roadways is consistent with policies in the Circulation Element and Land Use Element of the General Plan. These two roadways are shown in the General Plan as critical north-south arterials needed to relieve congestion along Sunrise Boulevard and their environmental effects were programmatically evaluated in the Rancho Cordova General Plan. See also discussion in Policy NR1.1 above.</p>
<p>Action NR.1.1.2 – Review projects through the entitlement process and CEQA analysis to ensure that they comply with this policy if the site contains unique habitat, creeks, and/or wooded corridors.</p>	<p>Yes, with Mitigation</p>	<p>This EIR/EIS evaluates the environmental effects on wetland and habitat conditions. See Policy NR 1.1 and Action NR.1.1.1 discussion above.</p>
<p>Action NR.1.1.3 - As part of the consideration of development applications for individual Planning Areas containing habitats that support special-status plant and animal species that are planned to be preserved, the City shall require that these preserved habitats have interconnections with other habitat areas in order to maintain the viability of the preserved habitat to support the special-status species identified. The determination of the design and size of the “interconnections” shall be made by the City, as recommended by a qualified professional, and will include consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service.</p>	<p>Yes, with Mitigation</p>	<p>See Policy NR 1.1 and Action NR 1.1.1 discussion above for a description of preserved habitat on the project site.</p> <p>The on-site preserve has connectivity to support special-status species within the project. The watershed in the preserve is sufficient to provide needed hydrology for all the existing and created vernal pools in the preserve area. This conclusion is based on the site design of the project and GIS analysis of the watershed using a Light Detection and Ranging (LiDAR) -derived topographic model and wetland delineation conducted for the wetland preserve. The watershed analysis concluded that the configuration of the preserve conserves almost 100% of the original watershed area and would not negatively impact the hydrologic function of the vernal pools that support special status species. The final preserved habitat mitigation will be developed in consultation with USFWS and DFG where required by law and mitigation measures in the EIR/EIS. The mitigation measure establishes success criteria and requires monitoring to ensure successful implementation.</p> <p>Although connectivity to off-site habitat is not required under the policy, the project wetland preserve connects to the proposed preserve area (as designated by the Rancho Cordova General Plan) to the east. There is no possible physical interconnection from the proposed preserve area to preserve lands on adjacent</p>

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		properties to the west and south because no existing or proposed preserves are present to the south or west and existing roadways (Sunrise Boulevard and Douglas Road) and development create a barrier to connectivity. Given the disturbed conditions of the central and northern portions of the project site, no large habitat preservation areas (with the exception of VELB preserve sites) are proposed (consistent with the General Plan). However, the preserve design does include drainage parkways that would provide habitat and movement corridors for wildlife species.
<p>Action NR.1.1.4 - Prior to the approval of any public or private development project in areas containing trees, the City shall require that a determinate survey be conducted during the nesting season (March 1 and August 31) to identify if active nesting by birds protected under the Migratory Bird Treaty Act (MBTA) is taking place. If all site disturbance is to occur outside this time, the actions described in this mitigation measure are not required. If nesting activity is observed, consultation with the City of Rancho Cordova Planning Department shall be conducted in order to determine the appropriate mitigation, if any, required to minimize impacts to nesting birds. No activity may occur within 100 feet of any nesting activity or as otherwise required following consultation with the California Department of Fish and Game.</p>	Yes, with Mitigation	Mitigation Measure 3.10-4c presented in the EIR/EIS is consistent with this Action. It requires preconstruction surveys during the nesting season for raptors. If active nests are found, the measure requires that appropriate buffers be established to protect 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.
<p>Policy NR.1.2 Conserve Swainson’s hawk habitat consistent with State policies and Department of Fish and Game Guidelines. (Further implemented through Action NR.1.2.1)</p>	Yes, With Mitigation	Mitigation measures 3.10-4c and 3.10-4d included in Section 3.10 of this EIR would ensure that the proposed project is consistent with this policy. Project impacts and proposed mitigation approach has been generally reviewed by the City and California Department of Fish and Game (City of Rancho Cordova, 2007).
<p>Action NR.1.2.1 – Establish a Swainson’s Hawk Ordinance in coordination with the California Department of Fish and Game to establish the process of mitigating for the loss of Swainson’s hawk foraging habitat based on habitat value lost to development. The ordinance will set forth a process where habitat lost to development will be mitigated through the permanent protection of equivalent or better existing habitat conditions (referred to hereafter as “mitigation lands”). The specific required mitigation ratios (habitat acreage lost</p>	Yes, with Mitigation	The City has not formally adopted a Swainson’s Hawk Ordinance. However, mitigation measure 3.10-4d presented in the EIR/EIS meets or exceeds the provisions contained in Action Item NR 1.2.1. See also Policy NR 1.2 discussion above.

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<p>versus mitigation lands) and any other provisions to mitigation process shall be established through technical studies as part of the development of the ordinance and will take into account value of habitat to be converted in relation to habitat value of the mitigation lands (e.g., relation to nesting sites), proximity of the mitigation lands to adjacent conditions affecting habitat (e.g., nearby land uses and already permanently protected lands), and other relevant factors. The ordinance will also establish standards ensuring that mitigation land will be adequately protected and managed in perpetuity (e.g., via conservation easement, deed restriction or other appropriate method), and setting forth the timing of the required provision of mitigation lands in relation with the timing of the loss of habitat in the City (as its boundaries may be changed through subsequent annexations), such that mitigation lands shall be provided no later than prior to ground disturbance.</p>		
<p>Policy NR.1.3 Promote educational programs that inform the public about natural resources.</p>	Yes	<p>The proposed project is consistent with this policy due to the 507-acre wetland preserve proposed for the south portion of the site. The wetland preserve will be highly visible with trails surrounding the perimeter. The preserve will allow for up close viewing by the public and emphasize the importance and benefit of wetland areas.</p>
<p>Policy NR.1.4 Discourage the planting of invasive species.</p>	Yes, With Mitigation	<p>The proposed project includes the implementation of a wetland mitigation monitoring plan that includes the use of grazing and restoration activities to maintain the vegetation conditions of the preserve. Mitigation measure 3.10-1a would require monitoring to ensure that invasive species do not adversely impact the preserve.</p>
<p>Policy NR.1.6 Participate in the development of a habitat conservation plan to address the unique biological resources in Rancho Cordova.</p>	Yes	<p>The City is currently participating in the South Sacramento Habitat Conservation Plan process.</p>
<p>Policy NR.1.7 Prior to project approval, the City shall require a biological resources evaluation for private and public development projects in areas identified to contain or possibly contain listed plant and/or wildlife species based upon the City's biological resource mapping provided in the General Plan EIR or other technical</p>	Yes, With Mitigation	<p>Biological resources impacts were evaluated in technical reports prepared by the project applicant and peer reviewed by the EIR/EIS consultant. Project impacts will be mitigated so that any decline of affected special status species will not cause a substantial adverse impact on viability of regional populations of these species. The mitigation for federally listed vernal pool invertebrates requires no net loss of</p>

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<p>materials. (Further implemented through Action NR.1.7.1)</p>		<p>habitat (acreage, value and function) (Mitigation Measure 3.10-4a (see also Mitigation Measure 3.10-1a (mitigation for wetlands and vernal pool impacts)). The mitigation includes performance standards and criteria to ensure that created and preserved habitat will be successfully maintained. The mitigation is to be designed in coordination with USFWS consultation and regulatory process (Section 7 biological opinion) to ensure the viability of the species regional population is not adversely affected. Similarly, the mitigation for the Valley Elderberry Longhorn Beetle requires no net loss of habitat (Mitigation Measure 3.10-4b). New habitat will be subject to performance standards and success criteria to ensure that habitat will be successfully maintained. The mitigation is developed in coordination with USFWS and DFG. The mitigation includes the incidental take permit and Section 7 consultation process for federally protected species. These processes will also ensure that the viability of the species regional population is not adversely affected. Impacts to Swainson’s hawk are mitigated by ensuring 1:1 mitigation of habitat value for foraging habitat lost as a result of the Project (Mitigation Measure 3.10-4c and 4d). The mitigation measure establishes criteria to determine a habitat value and requires consultation with DFG.</p> <p>Since impacted habitat will be replaced by habitat of equal acreage, value and function, the project will not result in decline of any protected species that will affect viability of regional populations. There is no evidence in the EIR/EIS that the loss of habitat from the project will result in an adverse significant impact on the viability of special status species in the region.</p>
<p>Action NR.1.7.1 - For those areas in which special status species are found or likely to occur or where the presence of species can be reasonably inferred, the City shall require mitigation of impacts to those species that ensure that the project does not contribute to the decline of the affected species populations in the region to the extent that their decline would impact the viability of the regional population. Mitigation shall be designed by the City in coordination with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG), and</p>		<p>Project impacts will be mitigated so that any decline of affected special status species will not cause a substantial adverse impact on viability of regional populations of these species. The mitigation for federally listed vernal pool invertebrates requires no net loss of habitat (acreage, value and function) (Mitigation Measure 3.10-4a (see also Mitigation Measure 3.10-1a (mitigation for wetlands and vernal pool impacts)). The mitigation includes performance standards and criteria to ensure that created and preserved habitat will be successfully maintained. The</p>

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<p>shall emphasize a multi-species approach to the maximum extent feasible. This may include development or participation in a habitat conservation plan.</p>		<p>mitigation is to be designed in coordination with USFWS consultation and regulatory process (Section 7 biological opinion) to ensure the viability of the species population is not adversely affected. Similarly, the mitigation for the Valley Elderberry Longhorn Beetle requires no net loss of habitat (Mitigation Measure 3.10-4b). New habitat will be subject to performance standards and success criteria to ensure that habitat will be successfully maintained. The mitigation is developed in coordination with USFWS and DFG. The mitigation includes the incidental take permit and Section 7 consultation process for federally protected species. These processes will also ensure that the viability of the species population is not adversely affected. Impacts to Swainson’s hawk are mitigated by ensuring 1:1 mitigation of habitat value for foraging habitat lost as a result of the Project (Mitigation Measure 3.10-4c and 4d). The mitigation measure establishes criteria to determine a habitat value and requires consultation with DFG.</p> <p>Habitat impacts will be mitigated through the preservation and creation of equal acreage, value and function, the project will not result in decline of any protected species that will affect viability of regional populations. There is no evidence in the EIR/EIS that the loss of habitat from the project will result in an adverse significant impact on the viability of special status species for the region. A loss of habitat on the project site does not constitute an effect that would result in loss of viability of species in the region since there is other habitat in the region that supports the species.</p> <p>See Policy NR 1.1 above for a discussion of mitigation required as a result of impacts to special status species.</p>
<p>Policy NR.1.8 The City shall encourage creation of habitat preserves that are immediately adjacent to each other in order to provide interconnected open space areas for animal movement.</p>	<p align="center">Yes</p>	<p>This policy encourages, but does not require, creation of adjacent habitat preserves. As discussed above, the size and location of the proposed preserve supports many natural resources policies. The project wetland preserve connects to the proposed preserve area to the east. There is no possible physical interconnection from the proposed preserve area to lands on adjacent properties to the west and south because existing roadways (Sunrise Boulevard and Douglas Road) and development create a barrier to connectivity. There are no existing or proposed preserve</p>

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		<p>areas adjacent to the south or west of the project site and the Agency Conceptual Strategy does not recommend any. Connectivity of Morrison Creek would be maintained upstream and downstream of the project site, providing opportunities for animal movement. Given the disturbed conditions of the central and northern portions of the project site, no large habitat preservation areas (with the exception of VELB preserve sites) are proposed (consistent with the General Plan). However, the preserve design does include drainage parkways that would provide for habitat and movement of wildlife species.</p>
<p>Policy NR.1.9 The City shall require that impacts to riparian habitats be mitigated at a no net loss of existing function and value based on field survey and analysis of the riparian habitat to be impacted. No net loss may be accomplished by avoidance of the habitat, restoration of existing habitat, or creation of new habitat, or through some combination of the above.</p>	<p>Yes, with Mitigation</p>	<p>Section 3.10 of the EIR/EIS includes mitigation measures that address the loss of riparian habitat consistent with this policy. Mitigation measure 3.10-2b expressly requires that mitigation for impacts to riparian habitats meet the performance standard of “no net loss” of overall habitat values and functions through either on-site or off-site efforts. The types of mitigations under the measure are consistent with the options identified in this policy. As identified in Section 3.10 of the EIR/EIS, the majority of the riparian habitat is of poor quality and would be mitigated consistent with its current value (e.g., nesting and foraging habitat).</p>
<p>Policy NR.1.10 The City shall avoid the placement of new roadways within habitat preserve to the maximum extent feasible.</p>	<p>Yes</p>	<p>The proposed project minimizes roadway crossing of the proposed wetland preserve to Rancho Cordova Parkway and Americanos Boulevard to the extent feasible. The roadways also are designed to minimize impacts on the preserve (see discussion of Policy NR.1.11 below). These roadways are integral regional roadways that are key facilities under the General Plan Roadway System and Sizing Map and their environmental effects were considered in the Rancho Cordova General Plan EIR. Without these connections, the City’s roadway system would not meet the key transportation provisions of the General Plan. Therefore, further avoidance of the placement of roadways in the habitat preserve areas is not feasible and would be inconsistent with the General Plan. Also, see discussion contained in policy NR 1.1.</p>
<p>Policy NR.1.11 In such cases where habitat preserves are crossed by a roadway, or where two adjacent preserves are separated by a roadway, the</p>	<p>Yes, With Mitigation</p>	<p>See discussion under Policy NR.1.10 above. Mitigation measures under Section 3.10 of the EIR/EIS address movement issues associated with changes to hydrologic conditions. The</p>

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<p>roadway shall be designed or updated with wildlife passable fencing separating the roadway from the preserve and/or shall incorporate design features that allow for the movement of wildlife across or beneath the road without causing a hazard for vehicles and pedestrians on the roadway.</p>		<p>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 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. These natural substrate span crossings would also provide for wildlife movement, including invertebrate species, and minimize habitat fragmentation. Bridge design would include a large enough span area to provide movement corridors for terrestrial wildlife even during high flows. Furthermore, wildlife passable fencing is required by the City along the preserve boundary. Also, see discussion contained in policy NR 1.1.</p>
<p>Policy NR.2.1 Require mitigation that provides for “no net loss” of wetlands consistent with current State and federal policies. (Further implemented by Action NR.2.1.1)</p>	<p>Yes, with Mitigation</p>	<p>The wetland preserve would consist of the highest quality and highest density vernal pools and seasonal wetlands in the project area. (See EIR/EIS Section 3.10) Wetland acreages within the wetland preserve that provide potential habitat for federally listed vernal pool invertebrates include 20.4 acres of existing vernal pools, 2.5 acres of seasonal wetland swale, 3.3 acres of seasonal wetland, and the creation of approximately 17.9 acres of vernal pools that would provide habitat. The watershed in the preserve is sufficient to provide needed hydrology for all the existing and created vernal pools in the preserve area based on GIS analysis of LiDAR-derived topographic models and wetland delineation. Furthermore, mitigation measures included in Section 3.10 of this EIR/EIS (see Mitigation Measures 3.10-1a and 3.10-1b) require that the applicant ensure no net loss of wetlands in accordance with federal and state policies (including obtaining a 404 permit).</p>
<p>Action NR.2.1.1 - During the environmental review process, evaluate feasible on-site alternatives that will reduce impacts to wetland resources and effectively preserve these resources.</p>	<p>Yes</p>	<p>Section 2.5 of the EIR/EIS presents an Impact Minimization Alternative. Under the Impact Minimization Alternative, project components would be reconfigured to avoid most, but not all impacts to USACE jurisdictional wetlands and high quality biological habitat. This alternative would result in 994.5 acres of wetland preserve in the southern portion of the project site. The City will determine if this alternative is feasible.</p>

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<p>Policy NR.2.2 Ensure that direct and indirect effects to wetland habitats are minimized by environmentally sensitive project siting and design, to the maximum extent feasible.</p>	Yes, with Mitigation	Mitigation measures under Section 3.10 of the EIR/EIS (see Mitigation Measures 3.10-1a and 3.10-1b) address direct and indirect effects to wetland resources. Because of the General Plan designation for the project area, which contemplates fairly dense urban development, the avoidance of all wetland habitat is infeasible. However, wetlands have been avoided or impacts have been minimized where feasible. The on-site preserve is a large contiguous area that contains the highest quality and highest density vernal pools and seasonal wetlands in the project area. (See EIR/EIS Section 3.10)
<p>Policy NR.2.4 Educate the public on the importance and benefit of wetlands areas.</p>	Yes	The proposed project is consistent with this policy due to the 507-acre wetland preserve proposed for the south portion of the site. The wetland preserve will be highly visible with trails surrounding the perimeter. The preserve will allow for up close viewing by the public and emphasize the importance and benefit of wetland areas.
<p>Action NR.2.4.1 - Develop trails and associated educational facilities (e.g., information kiosks, signage) around wetland and vernal pool preserves where possible while maintaining the integrity of sensitive natural resources.</p>	Yes	See discussion under Policy NR 2.4.
<p>Action NR.2.4.2 – Consider constructing low impact trails interior to preserves, such as elevated board walkways, in coordination with the U.S. Fish and Wildlife Service and U.S. Army Corps of Engineers.</p>	Yes	The project does not include interior trails to the preserve, but trails along the perimeter. Trails are not located in the preserve in order to minimize impacts on the preserve area.
<p>Policy NR.2.5 The City shall require that drainage improvements that discharge into areas of wetlands to be preserved are, to the maximum extent feasible, designed to mimic the undeveloped surface water flow conditions of the area in terms of seasonality, volume, and flow velocity.</p>	Yes, with Mitigation	Section 3.10 of the EIR/EIS presents mitigation measure 3.10-1b (Include in Drainage Plans all Wetlands that Remain on-site). This measure requires that all project phases commit to implement all measures in their drainage plans to avoid and minimize erosion and runoff into Morrison Creek in the proposed preserve and all wetlands that would remain on-site. The project proposes that the majority of drainage discharge would be outside of the wetland preserve area. The only drainage that would enter into the preserve area is a portion of the run-off from roadways located in the preserve. However, this drainage would be treated before discharge. The GIS watershed analysis shows that watersheds necessary to maintain drainage flows to support wetlands in the preserve will be maintained.

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<p>Policy NR.3.1 Coordinate with property owners and local interest groups, such as the Sacramento Urban Creeks Council, to restore, enhance, and preserve creeks in Rancho Cordova.</p>	<p align="center">Yes</p>	<p>Morrison Creek is to retain its natural contours and condition throughout the Project's 507-acre preserve area. Morrison Creek will be channelized once it leaves the preserve area up to the point where it leaves the southwest corner of the site via a culvert. The existing condition of the corridor of this section of Morrison Creek is disturbed due to past mining practices and aerospace activities on the project site. Although channelization of a portion of Morrison creek is necessary to provide adequate drainage of the site and consistency with other City policies, the channelization will retain its existing alignment.</p>
<p>Policy NR.3.2 In general, the City will encourage the preservation of existing location, topography, and meandering alignment of creeks. Where necessary, and if consistent with other City policies, the creation and realignment of creek corridors shall be constructed to recreate the character of the natural creek corridor. Channelization and the use of concrete within creek corridors shall not be supported.</p>	<p align="center">Yes</p>	<p>The project does propose the construction of drainage channels within the project area. Morrison Creek is to retain its natural contours and condition throughout the Project's 507-acre preserve area. Morrison Creek will be channelized once it leaves the preserve area up to the point where it leaves the southwest corner of the site via a culvert. The existing condition of the corridor of this section of Morrison Creek is disturbed due to past mining practices and aerospace activities on the project site. Although channelization of a portion of Morrison creek is necessary to provide adequate drainage of the site and consistency with other City policies, the channelization will not include a concrete channel or structure and the creek would retain its existing alignment.</p>
<p>Action NR.3.2.1 – Develop guidelines for channel creation or modification that will ensure channel meander, naturalized side slope, and varied channel bottom elevation are considered in design.</p>	<p align="center">Yes</p>	<p>As of the date of this document, the City has not adopted formal guidelines regarding channel creation or modification. However, the City has reviewed proposed drainage improvements of the project (including channelization of a portion of Morrison Creek) associated with these policies and other policy provisions of the General Plan and has determined that they are generally consistent with the intent of these policies.</p>
<p>Policy NR.3.3 Encourage the creation of secondary flood control channels where the existing channel supports extensive riparian vegetation. (Further implemented through Action NR.3.3.1)</p>	<p align="center">Yes, With Mitigation</p>	<p>The proposed construction of secondary drainage channels within the project area are designed to keep Morrison Creek in as much a natural state as possible (see Mitigation Measure 3.10-1b). See discussion under Policy NR 3.2 for a discussion of Morrison Creek. It is important to note that although Morrison Creek meanders in a natural state through the project site, Morrison Creek does not support riparian</p>

**Table 3.10-1
Project Consistency with City of Rancho Cordova Biological Resources Policies**

General Plan Policies	Consistency	Analysis
		vegetation.
<p>Action NR 3.3.1 – Work with affected local, state, and federal agencies, including SACOG, the California Department of Water Resources, Delta Keepers, and the U.S. Army Corps of Engineers, to determine when natural creek corridors can and should accommodate storm flows or if separate storm water conveyance structures are necessary.</p>	Yes, With Mitigation	Secondary stormwater conveyance structures have been incorporated into the project design. Consultation with affected agencies has occurred including U.S. Army Corps of Engineers and U.S. Fish and Wildlife Service. See Policy NR 3.3 discussion above.
<p>Policy NR.3.4 Encourage projects that contain wetland preserves or creeks, or are located adjacent to wetland preserves or creeks, to be designed for visibility and, as appropriate, access.</p>	Yes	The proposed project includes 507 acres of wetland preserve/mitigation bank that is located along several major roads, including Douglas Road along the southern limit of the project area. Access is limited due to the sensitivity of the wetlands. However, visibility is ensured due to wildlife passable fencing required by the City and by the siting of pathways and recreation along the outer edge of the preserve. The general siting and design of trails adjacent to the wetland preserve has been reviewed by the City, U.S. Army Corps of Engineers and U.S. Fish and Wildlife Service.
<p>Action NR.3.4.1 - Establish performance standards for natural resource preserves that accomplish the following: Provide sufficient width for a mowed firebreak (where necessary), adjacent passive recreation uses, and access for channel maintenance and flood control. Offer sufficient width in and/or adjacent to preserves to allow for existing and created wildlife habitat, species sensitive to human disturbance, vegetative filtration for water quality, corridor for wildlife habitat linkage, protection from runoff, and other impacts of urban uses adjacent to the corridor. Allow for sufficient width adjacent to natural resource preserves to allow for trails and greenbelts. Prohibit the placement of water quality treatment structures designed to meet pollutant discharge requirements within mitigation preserves.</p>	Yes	See discussion under Policy NR 3.4. The drainage parkway would handle project drainage and water quality control. A water quality swale would be constructed associated with the construction of Rancho Cordova Parkway to ensure pollutants are not discharged into preserve wetlands. The perimeter of the preserve would include buffer areas for the placement of trails.
<p>Action NR.3.4.2 – Establish standards that allow public access in the floodplain and buffers along creek corridors and preserves. Mitigation measures shall be incorporated into environmental documents and conditions of approval that require open-view fencing adjacent to preserves.</p>	Yes	See discussion under Policy NR 3.4.

**Table 3.10-1
Project Consistency with City of Rancho Cordova Biological Resources Policies**

General Plan Policies	Consistency	Analysis
<p>Action NR.3.4.3 – Establish standards and/or guidelines for development of adjoining wetland preserves or creeks to maximize visibility by designing the land plan with public streets on at least one side of the corridor or preserve with vertical curbs, gutters, footpath(s), street lighting, and post and cable barriers to prevent unauthorized vehicular entry into creek corridors and preserves.</p>	<p align="center">Yes</p>	<p>See discussion under Policy NR 3.4.</p>
<p>Policy NR.4.1 Conserve native oak and landmark tree resources for their historic, economic, aesthetic, and environmental value.</p>	<p>Yes, with Mitigation</p>	<p>Mitigation measure 3.10-3 included in Section 3.10 of this EIR/EIS would conserve trees within the proposed project or ensure the mitigation for trees that cannot feasibly be retained in light of the development densities and intensities contemplated by the General Plan. Therefore, the proposed project is consistent with this policy.</p>
<p>Action NR.4.1.1 - Implement the City’s Tree Preservation and Protection Ordinance (and update as necessary) to establish minimum requirements for preserving native trees and landmark trees in the City, including a definition of the size, species, and age requirements of landmark, oak, and other trees to be protected and/or replaced.</p>	<p>Yes, with Mitigation</p>	<p>The City has not yet established a tree ordinance consistent with its current General Plan and defers to the County Tree Ordinance when addressing impacts on trees within the City’s sphere of influence. The County Ordinance addresses the standards in this Action. See also Policy NR 4.1 discussion above and Policy NR 4.4 discussion below.</p>
<p>Action NR.4.1.2 - Where feasible, require underground utility lines that are in close proximity to oaks and other landmark trees to be designed and installed to minimize impacts to trees. Work with the utility provider(s) to coordinate transmission line location and other potential impacts associated with the undergrounding of the utilities.</p>	<p align="center">Yes</p>	<p>The project would likely remove 47 native oak trees greater than 6 inches dbh. No existing trees are expected to conflict with the installation of underground utility lines.</p>
<p>Action NR.4.1.3 - Establish development guidelines that require all oak habitat to be avoided to the maximum extent feasible. When avoidance is not possible, require mitigation efforts that result in preservation of in-kind habitat in the Planning Area.</p>	<p>Yes, with Mitigation</p>	<p>The project would result in the loss of 3 acres of oak woodland habitat. See discussion NR 4.1 for a description of tree mitigation.</p>
<p>Policy NR.4.2 Improve overall landscaping quality and sustainability in all areas visible to the public.</p>	<p align="center">Yes</p>	<p>The project includes design guidelines that call for landscape treatments within the project area, including parks and public open space areas.</p>
<p>Policy NR.4.3 Promote trees as economic and environmental resources for the use, education, and enjoyment of current and future generations</p>	<p align="center">Yes</p>	<p>The project includes design guidelines that call for landscape treatments and the general provision of trees within the project area, including parks and public open space areas.</p>

Table 3.10-1 Project Consistency with City of Rancho Cordova Biological Resources Policies		
General Plan Policies	Consistency	Analysis
<p>Policy NR.4.4</p> <p>Prior to the approval of any public or private development project in areas identified or assumed 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 six inches or more in diameter at breast height (dbh), multitrunk native oaks or native trees of 10 inches or greater dbh, or non-native trees of 18 inches or greater dbh that have been determined by a certified arborist to be in good health are found to occur, such trees shall be avoided if feasible. If such trees cannot be avoided, the project applicant shall do one of the following:</p> <ul style="list-style-type: none"> • All such trees shall be replaced at an inch-for-inch ratio. A replacement tree planting plan shall be prepared by a certified arborist or licensed landscape architect and shall be submitted to the City of Rancho Cordova for approval prior to removal of trees; or, • The project applicant shall submit a mitigation plan that provides for complete mitigation of the removal of such trees in coordination with the City of Rancho Cordova. The mitigation plan shall be subject to the approval of the City. • If the City of Ranch Cordova adopts a tree preservation ordinance at any time in the future, any future development activities shall be subject to that ordinance instead. 	Yes, with Mitigation	Mitigation measure 3.10-3 presented in the EIR/EIS is consistent with the provisions set forth in Policy NR.4.4.
<p><i>Source: Prepared by the City of Rancho Cordova Planning Department, 2008</i></p>		

The City has proposed revisions to certain policies and actions in the Natural Resources Element of the General Plan in order to clarify the City’s intent for these policy provisions. The proposed amendments involve policies NR.1.0, NR.1.11, NR.2.2 and NR.3.2 and action items NR1.1.1, NR.1.1.3 and NR.1.7.1. The proposed amendments also include the addition of a general definition of the term “feasible” which is consistent with the definition of that term under CEQA. The proposed definition of “feasible” is: “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Although these are proposed amendments, for the purposes of providing full information and disclosure in this recirculated DEIR/supplemental DEIS, below is an analysis of the proposed Project’s consistency with these proposed amendments.

**Table 3.10-2
Project Consistency with Proposed Revisions to Certain General Plan Natural Resources Policies**

General Plan Policies	Consistency	Analysis
<p>Proposed Revised Action NR.1.1.1 – Incorporate habitat preserves and interconnected wildlife corridors in new development areas to allow for animal movement where feasible and as necessary for viability of protected species</p>	<p>Yes, with Mitigation</p>	<p>The Project includes an on-site preserve that is a large area – 507-acres on the southern portion of the project site. Since the preserve is one nearly contiguous area, it provides on-site interconnections for invertebrate and other species. The watershed in the preserve is sufficient to provide needed hydrology for all the existing and created vernal pools in the preserve area. This conclusion is based on the site design of the project and the hydrologic analysis of a topographic model of the wetland preserve derived from Light Detection and Ranging (LiDAR)- technology. The LiDAR analysis concluded that the configuration of the preserve conserves almost 100% of the original watershed area and would not negatively impact the hydrologic function of the vernal pools. The proposed project's construction design would retain interconnections between on-site habitats by including measures to reduce interference with the hydrology that sustains vernal pools on-site.</p> <p>The roadways do not result in fragmentation of the on-site preserve. Although there will be new roads constructed through the wetland preserve, the project would include a special bridge design ("con-span") where the southern portion of Rancho Cordova Parkway crosses the wetland preserve and where the southern portion of Villagio Drive crosses Morrison Creek. (EIR/EIS, p. 2-22) Another con-span bridge would be constructed where Americanos Boulevard crosses Morrison Creek. (EIR/EIS, Exhibit 2-13). These natural substrate span crossings would provide for wildlife movement, including invertebrate species, and minimize habitat fragmentation. Bridge design would include a large enough span area to provide movement corridors for terrestrial wildlife even during high flows (i.e., the entire span would not be inundated). Furthermore, the alignment and design of the roadways is consistent with policies in the Circulation Element and Land Use Element of the General Plan. These two roadways are shown in the General Plan as critical north-south arterials needed to relieve congestion along Sunrise Boulevard and their environmental effects were programmatically evaluated in the Rancho Cordova General Plan EIR (State Clearinghouse No. 2005022137).</p> <p>Although connectivity to off-site habitat is not required under the policy, the project preserve</p>

Table 3.10-2 Project Consistency with Proposed Revisions to Certain General Plan Natural Resources Policies		
General Plan Policies	Consistency	Analysis
		<p>connects to the proposed preserve area to the east. There is no possible physical interconnection from the proposed preserve area to preserve lands on adjacent properties to the west and south because existing roadways (Sunrise Boulevard and Douglas Road) and development create a barrier to connectivity. In addition, there are no existing or proposed preserves adjacent to the south or west of the project site. Connectivity of Morrison Creek will be maintained upstream and downstream.</p> <p>See also discussion of compliance with Policy NR.1.1 on protection of special status species in Table 3.10.1.</p>
<p>Proposed Revised Action NR.1.1.3 - As part of the consideration of development applications for individual Planning Areas containing habitats that support special-status plant and animal species that are planned to be preserved, the City may require that these preserved habitats have interconnections with other habitat areas where feasible and appropriate to promote the viability of the preserved habitat to support the special-status species identified. The determination of the design and size of the "interconnections" shall be made by the City, with the consideration of a recommendation from a qualified professional, after the California Department of Fish and Game and U.S. Fish and Wildlife Service are provided with an opportunity to comment.</p>	Yes, with Mitigation	<p>See Action NR 1.1.1 discussion above for a description of preserved habitat on the project site. See also discussion of compliance with Policy NR.1.1 on protection of special status species in Table 3.10.1.</p> <p>The on-site preserve has connectivity to support special-status species within the project. The watershed in the preserve is sufficient to provide needed hydrology for all the existing and created vernal pools in the preserve area. This conclusion is based on the site design of the project and GIS analysis of the watershed using a Light Detection and Ranging (LiDAR) technology, topographic model and wetland delineation conducted for the wetland preserve. The watershed analysis concluded that the configuration of the preserve conserves almost 100% of the original watershed area and would not negatively impact the hydrologic function of the vernal pools that support special status species. The final preserved habitat mitigation will be developed in consultation with USFWS and DFG where required by law and mitigation measures in the EIR/EIS. The mitigation measure in this document establishes success criteria and requires monitoring to ensure successful implementation.</p> <p>Although connectivity to off-site habitat is not required under the policy to promote the viability of the habitat to support special-status species, the project wetland preserve connects to the proposed preserve area (as designated by the Rancho Cordova General Plan) to the east. There is no possible or feasible physical</p>

**Table 3.10-2
Project Consistency with Proposed Revisions to Certain General Plan Natural Resources Policies**

General Plan Policies	Consistency	Analysis
		<p>interconnection from the proposed preserve area to preserve lands on adjacent properties to the west and south because no existing or proposed preserves are present to the south or west and existing roadways (Sunrise Boulevard and Douglas Road) and development create a barrier to connectivity. Given the disturbed conditions of the central and northern portions of the project site, no large habitat preservation areas (with the exception of VELB preserve sites) are proposed (consistent with the General Plan) and none would be feasible. However, the preserve design does include drainage parkways that would provide habitat and movement corridors for wildlife species. The design of the proposed habitat preserves has been reviewed by biologists, and CDFG and USFWS have been given an opportunity to review and comment.</p>
<p>Proposed Revised Action NR.1.7.1 - For those areas in which special status species are found or likely to occur, the City shall require feasible mitigation of impacts to those species that ensure that the project does not contribute to the decline of the affected species such that their decline would impact the viability of the species. Feasible mitigation shall be determined by the City after the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG) are provided an opportunity to comment, and may emphasize a multi-species approach. This may include development or participation in a habitat conservation plan.</p>		<p>Project impacts will be mitigated so that any decline of affected special status species will not cause a substantial adverse impact on viability of these species. The mitigation for federally listed vernal pool invertebrates requires no net loss of habitat (acreage, value and function) (Mitigation Measure 3.10-4a (see also Mitigation Measure 3.10-1a (mitigation for wetlands and vernal pool impacts)). The mitigation includes performance standards and criteria to ensure that created and preserved habitat will be successfully maintained. The mitigation is to be designed in coordination with USFWS consultation and regulatory process (Section 7 biological opinion) to ensure the viability of the species population is not adversely affected. Similarly, the mitigation for the Valley Elderberry Longhorn Beetle requires no net loss of habitat (Mitigation Measure 3.10-4b). New habitat will be subject to performance standards and success criteria to ensure that habitat will be successfully maintained. The mitigation is developed in coordination with USFWS and DFG. The mitigation includes the incidental take permit and Section 7 consultation process for federally protected species. These processes will also ensure that the viability of the species population is not adversely affected. Impacts to Swainson's hawk are mitigated by ensuring 1:1 mitigation of habitat value for foraging habitat lost as a result of the Project (Mitigation Measure 3.10-4c and 4d). The mitigation measure establishes criteria to determine a habitat value and requires consultation with</p>

Table 3.10-2 Project Consistency with Proposed Revisions to Certain General Plan Natural Resources Policies		
General Plan Policies	Consistency	Analysis
		<p>DFG.</p> <p>Since habitat impacts will be mitigated through the preservation and creation of equivalent habitat, value and function, the project will not result in decline of any protected species that will affect viability of the populations. There is no evidence in the EIR/EIS that the loss of habitat from the project will result in an adverse significant impact on the viability of special status species. A loss of habitat on the project site does not constitute an effect that would result in loss of viability of species since there is other available habitat that supports the species.</p> <p>See also discussion of consistency with Policy NR 1.1 in Table 3.10-1 for a discussion of mitigation required as a result of impacts to special status species.</p>
<p>Proposed Revised Policy NR.1.10</p> <p>The placement of new roadways within habitat preserves shall be discouraged, but is not prohibited. This Policy shall not apply to roadways shown in the Circulation Element or needed to meet goals or policies of the Circulation Element.</p>	Yes	<p>Rancho Cordova Parkway and Americanos Boulevard are integral regional roadways that are key facilities shown in the General Plan Roadway System and Sizing Map in the Circulation Element and their environmental effects were considered in the Rancho Cordova General Plan EIR (State Clearinghouse No. 2005022137). Without these connections, the City's roadway system would not meet the key transportation provisions of the General Plan.</p> <p>Although this policy exempts these roadways, the proposed project minimizes roadway crossing of the proposed wetland preserve to the extent feasible. The roadways also are designed to minimize impacts on the preserve (see discussion of Policy NR.1.1.1 above and Policy NR.1.11 below). Therefore, further avoidance of the placement of roadways in the habitat preserve would be inconsistent with the General Plan and is not feasible. Also, see discussion contained in policy NR 1.1 in Table 3.10-1.</p>
<p>Proposed Revised Policy NR.1.11</p> <p>In such cases where a new roadway crosses a habitat preserve or separates two adjacent preserves, the roadway shall include design features, where feasible and appropriate, to allow for the movement of wildlife across or beneath the road without causing a hazard for vehicles, bicycles and pedestrians on the roadway.</p>	Yes, With Mitigation	<p>See discussion under Policy NR.1.10 above. Mitigation measures under Section 3.10 of the EIR/EIS address movement issues associated with changes to hydrologic conditions. 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 as natural substrate span crossings over Morrison</p>

**Table 3.10-2
Project Consistency with Proposed Revisions to Certain General Plan Natural Resources Policies**

General Plan Policies	Consistency	Analysis
		Creek. Rancho Cordova Parkway and Americanos Boulevard would cross Morrison Creek with a clear span of the delineated wetlands within the channel bank. These natural substrate span crossings would also provide for wildlife movement, including invertebrate species, and minimize habitat fragmentation. Bridge design would include a large enough span area to provide movement corridors for terrestrial wildlife even during high flows. Furthermore, wildlife passable fencing is required by the City along the preserve boundary. Also, see discussion contained in under Action NR.1.1.1 above and policy NR 1.1 in Table 3.10.1.
<p>Proposed Revised Policy NR.2.2 Ensure that direct and indirect effects to wetland habitats are mitigated to the extent feasible by environmentally sensitive project siting and design or other measures.</p>	Yes, with Mitigation	Mitigation measures under Section 3.10 of the EIR/EIS (see Mitigation Measures 3.10-1a and 3.10-1b) address direct and indirect effects to wetland resources. Because of the General Plan designation for the project area, which contemplates fairly dense urban development, the avoidance of all wetland habitat is infeasible. However, wetlands have been avoided or impacts have been mitigated where feasible. The on-site preserve is a large contiguous area that contains the highest quality and highest density vernal pools and seasonal wetlands in the project area. (See EIR/EIS Section 3.10)
<p>Proposed Revised Policy NR.3.2 In general, the City will encourage the preservation of existing location, topography, and meandering alignment of natural creeks. The modification, re-creation and realignment of natural creek corridors shall recreate the character of the natural creek corridor to the extent feasible, appropriate and consistent with other City policies. Channelization and the use of concrete within creek corridors shall be discouraged, but is not prohibited.</p>	Yes	Morrison Creek is to retain its natural contours and condition throughout the Project's 507-acre preserve area. Morrison Creek will be channelized once it leaves the preserve area up to the point where it leaves the southwest corner of the site via a culvert. The existing condition of the corridor of this section of Morrison Creek is disturbed due to past mining practices and aerospace activities on the project site. Although channelization of a portion of Morrison creek is necessary to provide adequate drainage of the site and consistency with other City policies, the channelization will not include a concrete channel or structure and the creek would retain its existing alignment.

Source: Prepared by City of Rancho Cordova Planning Department, 2008