

**Public Comments for Lent Ranch MarketPlace Draft EIR**  
**November 29, 2000**

My name is Mike Brady. I'm a wildlife biologist for the U.S. Fish and Wildlife Service at the Stone Lakes National Wildlife Refuge where I've worked for the past four years. I've been a professional wildlife biologist in the private and public sectors for the past 11 years. The U. S. Fish and Wildlife Service and the Stone Lakes NWR have serious concerns about the accelerating loss of agricultural lands in southern Sacramento County and the growth <sup>ing</sup> ~~inducement~~ effects of what we consider to be "leap-frog developments" such as the Lent Ranch project. Loss of the remaining open space in this part of the county to projects such as Lent Ranch and the associated impacts on traffic, noise, and air and water quality all adversely effect the migratory waterbird populations that utilize this area and in particular, the nearby Cosumnes River Preserve and Stone Lakes NWR. The Lent Ranch project would be less than a half mile from the Cosumnes River flood plain and within the watershed of the Stone Lakes Refuge. In particular, the Service is greatly concerned about how loss of agricultural lands on the project site and on neighboring properties may reduce populations of dwindling ~~special~~ Federal and State status species such as the tri-colored blackbird which historically nested adjacent to the project site, greater sandhill crane, white-face ibis, long-billed curlew, Swainson's hawk, and burrowing owl.

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We are also concerned how conversion of such a large piece of land to a highly intensive commercial use will impair the ability of adjacent landowners to continue their traditional way of life. Even though large residential projects are proposed to the north and west of the project site, leaping ahead with a project of this commercial magnitude will "lock in" and "seal the fate" of adjacent farmers who may instead wish to pursue a less intensive types of development, *or continue farming.*

We believe it is inappropriate for the City of Elk Grove to consider a development of this magnitude and nature directly on the edge of Sacramento County's Urban Service Boundary, particularly since the city adopted the County General Plan in July 2000. Establishment of the County's Urban Service Boundary came after an arduous, ~~#~~ multi-year, county-wide planning effort and for the city to propose a project such as this at this location suggests that city planning actions are being pursued independently ~~of~~ and in isolation from previous regional planning efforts.

We strongly question the conclusion of the Draft EIR which labels **Alternative #5**, the Offsite Alternative, as being environmentally inferior to the other "with project" alternatives. Particularly since the Draft EIR itself characterized the Off-site Alternative as being "more consistent with General Plan policy"

since it would result in a more "compact urban form" and be "located closer to existing transit routes than the proposed project" (~~Alternative 4~~). Furthermore, we believe that when considering all the "with project" alternatives, Alternative 1b not Alternative 4, is clearly the environmentally superior alternative.

In addition, the Service and the refuge have concerns related to water quality and the potential downstream effects of drainage generated by this project. Runoff from this project will ultimately be received by South Stone Lake, which is already being affected by increasing urban runoff. This watershed supports critical migratory waterbird and endangered species populations and a valuable fishery.

The Service and Stone Lakes NWR intend to continue to closely monitor this project and actively participate in ongoing regional efforts to protect our remaining agricultural lands and open space. Thank you for the opportunity to comment on this project and we will be mailing you written comments on the DEIR.

will send formal comments

2. Letter from United State Fish and Wildlife Service - Stone Lakes, Mike Brady, dated November 29, 2000

**Response 1**

These comments are a reiteration of those provided in Letter No. 1 by the U.S. Department of Interior dated December 14, 2000. Please see the responses to that letter. Responses to these comments are provided in Responses 1 through 7, and 9. No further response is required.