

DEC  
Letter No. 18  
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ELK GROVE  
PLANNING DEPARTMENT

**COSUMNES COMMUNITY PLANNING ADVISORY COMMITTEE**

**GARY CORTOPASSI, CHAIR  
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December 14, 2000

Mr. Patrick Angell  
City of Elk Grove  
8949 Elk Grove Boulevard  
P. O. Box 1776  
Elk Grove, CA 95759-1776

RE: Cosumnes CPAC comments on the Draft Environmental  
Impact Report for the Lent Ranch Marketplace

Dear Mr. Angel,

First, I want to express the appreciation of the Cosumnes CPAC (CCPAC) to the Elk Grove Planning Commission for extending the time in which to submit written comments. CCPAC met last night and 100% of the membership were present and the vote was unanimous in support of the following comments.

- The Draft Environmental Impact Report (DEIR) is not in compliance with Section of 15378 of CEQA Guidelines since the Lent Ranch Marketplace and the Highway99/Grantline Road Interchange are not being considered in the same EIR. Combining both projects would have required the EIR to address issues not addressed in the DEIR -- which are identified below.
- Even if the Commission considers the two items do not meet the definition of a single "project" in the guideline, the DEIR is inadequate in that the traffic impact analysis does not consider the cumulative impact in the area intended to draw customers. Since customers will be drawn from Sloughhouse, Rancho Murieta, the proposed Clay Station 1200 subdivision, and the Sunrise/Douglas subdivision the DEIR should have addressed and found mitigation for the following:
  - The impact of the Lent Ranch Marketplace, with respect to traffic, on Dillard, Green, Wilton, and Grantline Roads. Dillard and Green Roads are already heavily used and there have been numerous accidents and deaths on both roads. Grantline is already being used as a "cross town" by-pass and the traffic is congested all day -- particularly at commute times and on weekends. Improvement to all the reference roads must be addressed since the Lent Ranch Marketplace will increase the traffic yet this issue is not addressed

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- With the increased traffic there will be increased vehicle emission in the Wilton area. Yet, the DEIR does not address the air quality issue and offers no mitigation. 3
- The DEIR should provide for mitigation for the loss of farmland of statewide importance. 4
- The DEIR should provide for mitigation of the environmental effects of the project on the Cosumnes River and Stone Lakes Basins. 5
- The DEIR should address the impact of the Lent Ranch Marketplace on the floodplain. Urban development and removal of this area from the floodplain will aggravate flooding elsewhere, particularly in the Wilton area. 6
- The DEIR should address the potential hazard of the proposed site's proximity to the Suburban Propane Plant. 7
- Since the Lent Ranch Marketplace basically abuts the Urban Services Boundary, the DEIR should provide for a buffer between the Marketplace and the USB 8
- Malls are generally found in the center of population areas. The Lent Ranch Marketplace is on the outside edge of a population area. The DEIR should address the potential expansion of population areas and determine the impact of such development on the south side of the proposed Marketplace. 9

In general, the CCPAC feels that the DEIR is totally inadequate and generally is fraught with erroneous conclusions with respect to the effect of the mitigation proposals. We also believe that the Planning Commission should not proceed with this project until the City adopts its own General Plan. During the process of developing the general plan, alternative sites will most likely be reviewed which would show that there are alternative sites which:

- Have a more central location 10
- Are served by public transit
- Have pedestrian access
- Will not have the problems identified if the Lent Ranch Marketplace is allowed to be built in the proposed location.

I apologize that we are unable to provide specific mitigation proposals which would alleviate some or all of our concerns. However, the time frame within which we had to work was not conducive to such recommendations.

I want to thank you for adding the CCPAC to your mailing list and I look forward to a continuing, cordial working relationship between CCPAC, the Elk Grove Planning Commission, and the Elk Grove City Council.

Very truly yours,



Gary Cortopassi, Chair  
Cosumnes Community Planning Advisory Council.

18. Letter from Cosumnes Community Planning Advisory Council, Gary Cortopassi, dated December 14, 2000

**Response 1**

Please refer to **Topical Response 1 - Segmentation** regarding the separation of these projects.

**Response 2**

The Draft EIR analyzes the cumulative effect of the Project with numerous past, present and planned developments in the area, including the SR-99/Grant Line Road Interchange. However, the Project and the SR-99/Grant Line Road Interchange are two separate “projects” under CEQA, and thus are appropriately analyzed in two separate EIR documents. Please refer to **Topical Response 1 - Segmentation** regarding the separation of these projects.

The scope of the traffic analysis was developed under the direction of City of Elk Grove and Sacramento County staff and included the analysis of Grant Line Road between State Route 99 and Bradshaw Road. All of the County maintained roadways in question are two-lane roadways with moderate access control, have standard roadway cross-sections, and have a capacity of 18,000 vehicles per day based on the City of Elk Grove and Sacramento County Traffic Impact Guidelines (summarized in Draft EIR Table 4.2-1). State Route 16 (east of Grant Line Road) is as a rural two-lane highway. The capacity of a rural two-lane highway is 22,900 vehicles per day as outlined in the City of Elk Grove and Sacramento County Traffic Impact Guidelines. Existing (i.e., “No Project”) daily volumes for the roadways in question are summarized below:

County Maintained Roadways (Source: Sacramento County Traffic Volume Flow Map, 1998)

- Grant Line Road (east of Bradshaw Road) - 7,900 vehicles per day;
- Wilton Road (east of Grant Line Road) - 10,600 vehicles per day;
- Wilton Road (west of Dillard Road) - 3,400 vehicles per day;
- Green Road (north of Wilton Road) - 3,500 vehicles per day;
- Dillard Road (north of Wilton Road) - 2,800 vehicles per day;
- Dillard Road (south of Wilton Road) - 3,400 vehicles per day; and

State Highway (Source: Caltrans, 1998 Traffic Volumes on California State Highways)

- State Route 16 (east of Grant Line Road) - 12,300 vehicles per day.

Eight percent of project trips (approximately 5,100 vehicles per day) are expected to use Grant Line Road east of Bradshaw Road. Assuming all 5,100 trips use each roadway in question (which is unlikely), the daily volume on each roadway would still be less than the capacity of 18,000 vehicles per day for the County maintained roadways (22,900 vehicles per day for State Route 16) as identified in the City of Elk Grove and Sacramento County Traffic Impact Guidelines and would operate at acceptable levels of service. Consequently, the impact of the project on these roadways would be less than significant. This scenario is "worst-case" since the actual percentage of project trips on these roadways would likely be less than eight percent.

Neither the City of Elk Grove, Sacramento County, or Caltrans maintains threshold of significance criteria under CEQA for identifying impacts of a project based on vehicle accidents. Because project impacts on traffic levels on Dillard Road, and Green Road are less than significant, the project would not be expected to create an increase in the rate of accidents on these roadways.

**Response 3**

Please note that air emissions are addressed on pages 4.3-10 through 4.3-18 of the Draft EIR, and include both traffic-related and stationary sources. These emissions would be generated on a regional basis and would affect the entire air basin, which includes the Wilton area. In addition, please refer to Table 4.3-5 on Draft EIR page 4.3-14 where numerous mitigation measures are provided that would reduce total project emissions. Regardless of the implementation of these mitigation measures, however, the impact on air quality associated with the project was considered to be significant and unavoidable.

**Response 4**

Please refer to **Topical Response 2 - Agricultural Resources** for a discussion on the loss of agricultural resources and an evaluation of mitigation measures.

**Response 5**

The project site is within the southern sub-drainage shed of the Stone Lake Creek watershed; surface drainage on the project site occurs via agricultural drainage ditches to Beach Stone Lakes and not the Cosumnes River. All drainage to the west of SR-99 drains to Beach-Stone Lakes and to the east of SR-99 to the Cosumnes River.

Draft EIR Section 4.7, Hydrology and Water Quality, identifies the water quality and flooding issues related to the project. The proposed project and project site would be subject to a variety of regulations related to hydrology and water quality, including the requirements of the Central Valley Regional Water Quality Control Board (CVRWQCB) and the City of Elk Grove. Short-term water quality issues are addressed in the Draft EIR as follows:

“The project construction contractor would be required to file a notice of intent under the State’s NPDES General Construction Permit (CAS00002). This permit requires that a Storm Water Pollutant Prevention Plan (SWPPP) be prepared specifying BMPs to reduce erosion of disturbed soils. In addition, the SWPPP would require that if any spills of materials known to be water pollutants or hazardous materials do occur, the proper agencies would be contacted immediately (if necessary) and appropriate clean-up of the spill would take place as soon as possible. BMPs that would be implemented during site grading and construction could include use of straw hay bales, straw bale inlet filters, filter barriers, and silt fences. In, addition, the project is subject to the City Land Grading and Erosion Control Ordinance. This ordinance establishes administrative procedures, minimum standards for review, and implementation and enforcement procedures for controlling erosion, sedimentation, disruption of existing drainage and related environmental damage caused by land clearing activities, grading, filling, and land excavation.”(Draft EIR, page 4.7-11 and 4.7-12)

Implementation of these requirements would reduce short-term water quality impact to a less than significant level.

Long-term water quality issues are addressed in the Draft EIR as follows:

“Water quality features incorporated into the project that address the removal and/or filtration of pollutants from runoff include the water quality and detention basin. A permanent micro pool may be created at the downstream end of the basin. This permanent micro pool would be supplied by drainage runoff and sized based on summer flow runoff to provide 14-day retention time. The permanent micro pool would be designed such that there would be sufficient flushing to avoid stagnation and replenishment of water lost to evaporation. The removal of pollutants within the detention basin would be accomplished through the sedimentation of solids and the filtration and trapping of pollutants by biofiltration systems, vegetated swales, vegetative strips, and oil/water separators designed to remove petroleum compounds and grease, but which will also remove floatable debris and settleable solids. These are common practices recommended and accepted by the SWRCB to reduce pollutants in receiving waters in order to meet water quality standards established in the CWA. Other specific BMPs to minimize pollutants entering the storm drain system that would be implemented include:

- a) Public Education/Participation activities. Information shall be provided to new project residents and tenants regarding pollution prevention;
- b) Materials Management activities. The project shall implement the following measures within any common landscaping or other facilities on-site.
- c) Materials Use Controls, which include good housekeeping practices (storage, use and cleanup) when handling potentially harmful materials, such as cleaning materials, fertilizers, paint, and where possible using, safer alternative products;

- d) Material Exposure Controls, which prevent and reduce pollutant discharge to storm water by minimizing the storage of hazardous materials (such as pesticides) on site, storing materials in a designated area, installing secondary containment, conducting regular inspections, and training employees and subcontractors; and
- e) Material Disposal and Recycling, which includes storm drain system signs and stenciling with language to discourage illegal dumping of unwanted materials. The project shall notify project residents of household hazardous waste and used oil recycling at collection centers and round-up activities conducted by the City or County.
- f) Spill Prevention and Cleanup activities which are directed toward reducing the risk of spills during the outdoor handling and transport of chemicals, and toward developing plans and programs to contain and rapidly clean up spills before they get into a storm drain system. This BMP also deals with the prevention and reduction of pollution from vehicle leaks and spills from vehicles during transport, as well as aboveground storage tanks;
- g) Illegal Dumping controls. The Covenants, Conditions, and Restrictions (C, C, & R's) for the project shall include a prohibition on the dumping of waste products (solid waste/liquid waste and yard trash) into storm drain systems, open space areas, and creeks;
- h) Street and storm drain maintenance activities. These activities control the movement of pollutants and remove them from pavements through catch basin cleaning, storm drain flushing, street sweeping, and by regularly removing illegally dumped material from storm channels and creeks. (The City of Elk Grove would be responsible for regular storm drain maintenance within the public right of way; grease traps and other stormwater quality control devices on private property shall be maintained by the project.)

The water quality and detention basin, and other BMPs incorporated into the project would reduce project-related water quality impacts from urban development to less than significant levels. " (Draft EIR, pages 4.7-15 and 4.7-16)

Project drainage improvements include an approximately eight-acre water quality and detention basin west of the property boundary, proposed to control urban runoff from the project site. The basin incorporates an existing irrigation water recovery basin within the South Pointe site that has historically been used by Lent Ranch in its agricultural operations. The proposed basin, located along the western side of the adjacent South Pointe project, would be constructed at a sufficient size to reduce peak runoff flows from pre-development levels. The runoff would be released into the existing agricultural ditch system at a rate not to exceed the pre-development levels. As such, impacts would be reduced to a less than significant level.

As stated in Draft EIR Section 4.8, Biological Resources, cumulative development in the southern Sacramento County area would result in the loss of a number of other agricultural areas and the connectivity they provide between preserved open space areas and as temporary resting and foraging sites for migrating birds. The loss of an additional 293 acres of habitat as a result of the Lent Ranch project would significantly contribute to the ongoing conversion of wildlife habitat in the Southern

Sacramento County area to a developed condition. When viewed in terms of the overall value of this habitat to both common and special-status wildlife species, this additional loss of wildlife habitat is substantial and therefore, considered a significant cumulative impact.

#### Response 6

Please refer to Response 5 above. The project site and the Wilton area are not within the same drainage area. Wilton is located on the east side of SR-99 and the project site on the west side of SR-99. In addition, the Wilton area is north of the project site which if the two locations were in the same watershed would be upstream of the project site and not result in flooding to the Wilton area. Also, the project site is not within a 100-year or 500-year floodplain and is outside of the Folsom Dam failure floodplain area. Flooding within the Beach-Stone Lakes is addressed in Draft EIR Section 4.7, Hydrology and Water Quality. As stated in the Draft EIR,

“Of the approximately 294.8 acres of the project site, an estimated 280 acres would be covered with impervious surfaces, or 95 percent of the site. As such, the development of the project site would increase the volume of runoff from those areas of the site that would be covered by roads, buildings, paved parking areas, and other relatively impermeable or impervious features. Increased runoff volumes from the site could result in off-site flooding if allowed to exit the project area unchecked. The detention basin proposed as part of the project would detain the increased runoff volumes generated by the project and release them into the drainage system at a rate of discharge that is no greater than presently exits on the site. As such, the downstream water surface elevation would be the same or less than pre-development conditions, thus resulting in less than significant impacts.

The time occurrence or period at which water would be discharged into the drainage system, however, would be slightly increased over existing conditions. This would be a direct result of the increase in water volumes generated by the project being detained within the detention basin. This increase in period of time for water to be discharged into the drainage system would result in some areas downstream (including some ditches and roads) being inundated for a somewhat longer period. However, this increase in period of time for water to be discharged into the drainage system is considered to be less than significant.

It should be noted the project as outlined within the Draft Public Facilities Financing Plan would provide the Sacramento County Water Agency Zone 11A (Morrison Creek stream group watershed) with development impact funding for on and offsite drainage improvements to assist in alleviating regional flood conditions. The amount of fees to be paid by development projects and use of fees for drainage improvements are identified within the Sacramento County Water Agency, *Engineer's Report For Formation of Zones 11A, 11B, and 11C (Fee Plan)*. Identified drainage improvements within Zone 11A include, and are not limited to, the development of trunk pipe facilities, open channel construction, dual purpose detention, upsizing bridges and large culverts for ultimate capacities, and property acquisition.” (Draft EIR, page 4.7-13)

**Response 7**

Please refer to Draft EIR Section 4.5, Hazards, and the responses to Letter 11 submitted by the Elk Grove Community Services District, Mark Meaker, dated December 12, 2000. Suburban Propane is addressed on Draft EIR pages 4.5-1 through 4.5-6, and pages 4.5-9 through 4.5-39. The conclusion as contained within the Draft EIR indicated that the vast majority of the project site falls within the one chance in 10,000,000 to 100,000,000 zone of a fatality per year with the exception of a small portion along the eastern boundary of District D, where the risk is within the zone of one chance in 1,000,000 to 10,000,000 of a fatality per year. It should be noted that District D is in the upper limits of the zone closer to the one chance in 10,000,000 of a fatality per year area. The most common acceptable risk in the international standards and the standards used in this EIR to constitute significance is one chance in 1,000,000 of a fatality per year. This means that all locations 600 feet and farther beyond the Suburban Propane and Georgia Pacific fencelines are defined as acceptable. It should be noted that no public residences, parks, etc., are within 600 feet of the fencelines. Thus, the risk level posed by these facilities are viewed as acceptable and impacts are considered to be less than significant (see Draft EIR, page 4.5-23).

**Response 8**

The project is separated from agricultural land to the south by 96-foot wide Kammerer Road, landscaping on the north side of the roadway, and landscaping on the south side of the roadway, for a total width of approximately 132 feet. Kammerer Road, with the traffic it carries, serves as a physical barrier that is a more effective buffer than an equivalent width of raw land since it functions as an obvious separation between land uses. Land use compatibility issue associated with the project are addressed in Draft EIR Section 4.2 Agricultural Resources. In addition, please refer to **Topical Response 2 - Agricultural Resources** for a discussion of buffers and impacts associated with land use compatibility.

**Response 9**

Please refer to Draft EIR Section 8.0, Growth Inducement, where growth outside the USB is addressed, as well as **Topical Response 4 - Growth Inducing Impacts**.

**Response 10**

The Draft EIR is based on substantive evidence in the record to support conclusion and proposed mitigation measures. Since the commentor does not provide a reference to specific conclusions, no further response can be provided.

The County of Sacramento General Plan, which was expressly adopted by the City of Elk Grove upon incorporation, is the current and valid General Plan of the City of Elk Grove. As such, the current General Plan serves as the “constitution” for all planning decisions in the City of Elk Grove. The incorporation of the City of Elk Grove did not establish a de facto moratorium on development within the City boundary for the length of time necessary for the City to prepare a new General Plan, and the City is permitted to consider and approve development projects under the current General Plan. Under state law, the City has at least 30 months after incorporation to implement a new General Plan if it chooses to do so. *Government Code* §65360. At present, the current General Plan is in effect and governs this project.

The City intends to commence with the preparation of new General Plan for the City this year. The City Council is expected to provide City staff initial direction on how to proceed with the General Plan process in February. The City will be soliciting input from City residents and interested parties on the scope of the General Plan in the future and will have an extensive public participation process.

It should be note that offsite alternative were reviewed and discussed in the Draft EIR, please refer to **Topical Response 3 - Off-Site Alternatives**.