

STONE LAKES REFUGE ALLIANCE

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ELK GROVE
PLANNING DEPARTMENT

Mr. Patrick Angell
Department of Planning and Community Development
8949 Elk Grove Boulevard
Post Office Box 1776
Elk Grove, California 95759-1776

Dear Mr. Angell,

Re: Lent Ranch Marketplace Project

The Stone Lakes Refuge Alliance has existed for many years, with the objective of gaining public support for the development and protection of this important National Wildlife Refuge. Insofar as the proposed Lent Ranch Marketplace project poses a level of threat to this refuge, it is of concern to the Alliance.

The Stone Lakes NWR is an important public asset, of great value to the citizens of the nation, of the Central Valley and especially to the residents of the nearby City of Elk Grove. Because the protection of this refuge is in the best interests of the city, the city must evaluate the proposed project with great care and ultimately must refuse permission for its development.

The Alliance is concerned about the environmental problems which the Lent Ranch Marketplace project will create and about the adequacy of the draft EIR in describing and analyzing those problems.

Located on the edge of the county urban service boundary, in the midst of productive agricultural lands, this proposed develop constitutes wasteful, destructive and unaesthetic non-contiguous ("leap-frog") development of the kind that the county residents have long wished prevent. You may remember that the county residents, in the general election two weeks ago, soundly rejected Measure O, a measure that would have permitted a specific leap-frog development project in the unincorporated eastern part of the county.

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Development of the large Lent Ranch parcel will disrupt the continued productive agricultural uses now present on surrounding lands, and will create the economic forces that will drive these lands out of agricultural use and into urban and suburban uses. The initial project, and those induced projects which it will engender on nearby land, will create for the City and for the county environmental problems such as increased (and more polluted) water runoff, risks of greater flooding after storms, and conditions of greater traffic and its

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resultant air pollution. Have these issues been sufficiently covered in the draft EIR?

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While this project is in fact a few miles east of the Stone Lakes NWR, its impacts will still be felt there. The quality of waters running westward will be degraded and the larger natural habitat of the region, existing and potential through restoration efforts, will be reduced for such species as the endangered giant garter snake, the tri-colored blackbird and the burrowing owl.

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As you know, these problems will also impact the Cosumnes River Preserve, which is much closer to this proposed project than is the Stone Lakes NWR. This preserve provides direct and immediate recreation and open space benefits to the City of Elk Grove, benefits that will be diminished if the Lent Ranch project is permitted. Have these off-site problems been adequately covered by the draft EIR?

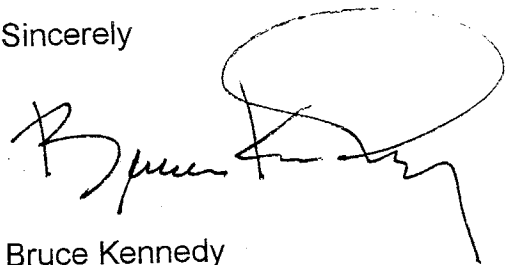
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Friends of mine who live in Elk Grove voted for incorporation so as to protect their community from the sort of urban sprawl that dominates Southern California and the San Francisco Bay Area, and is now spreading through the Sacramento Valley. Elk Grove wanted an identity, physical and psychological, which was separate from that of Sacramento. Yet, with projects like the one proposed on the Lent Ranch property, Elk Grove will be just become another node in the growing wall-to-wall urbanization which we are today seeing under development in south Sacramento county. Is this issue, the cumulative impact of this proposed development on urban sprawl, adequately dealt with in the draft EIR?

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The Stone Lakes Refuge Alliance appreciates the opportunity to comment on the proposed project's draft EIR document and wishes to be kept informed of the further steps which the proposed project will undergo in the planning and EIR processes.

Sincerely



Bruce Kennedy
President

22. Letter from Stone Lakes Refuge Alliance, Bruce Kennedy, no date

Response 1

Please refer to **Topical Response 4 - Growth Inducing Impacts** for a discussion of leapfrog development. This project and Deer Creek Hills (Measure O) are substantially different from each other in regards to proximity to existing and planned development, as well as infrastructure services. Additionally, the Deer Creek Hills project was outside of the Urban Services Boundary(USB), while the proposed project is within the USB and Urban Policy Area (UPA).

Response 2

In Draft EIR Section 4.1, Agricultural Resources, issues associated with the disruption of productive agricultural uses (i.e., land use compatibility) are addressed both on a project specific and cumulative basis. Specific issues addressed included agricultural chemical usage, trespassing and pilfering, and agricultural odors. As presented in the Draft EIR, the implementation of the project and cumulative development would place urban land use within a primarily agricultural area, which may impair agricultural production and result in land use compatibility conflicts. While land use conflicts between the project and cumulative development and agricultural uses can be minimized by existing standards and policies, impacts associated with the viable use of surrounding agricultural land were considered to be significant and unavoidable.

The development of urban or suburban uses near the project site would be at the discretion of the individual landowner, and it would be speculative to guess whether they would prefer to keep farming, or develop with low intensity or high intensity uses. The Draft EIR does, however, acknowledge that the project is growth inducing and such growth could result in further environmental effect beyond what was considered in the General Plan EIR. These issues are addressed within Draft EIR Section 8.0, Growth Inducement.

Response 3

All these issues have been addressed within the Draft EIR. Please refer to Draft EIR Section 4.7, Hydrology and Water Quality, for a discussion of water runoff and flooding, Section 4.2, Transportation and Circulation, for a discussion of increased traffic, and Section 4.3, Air Quality, for a discussion of air pollution. No further response is required.

Response 4

Water quality and runoff issues were addressed within Draft EIR Section 4.7, Hydrology and Water Quality, and Draft EIR Section 4.8, Biological Resources. Impact to the Beach-Stone Lakes and the Stone Lake NWR would be reduced to a less than significant level through the incorporation of mitigation measures MM4.7-1 through MM4.7-3 contained with the Draft EIR.

As indicated in the Draft EIR, the applicant shall prepare and submit to the City of Elk Grove, a Storm Water Pollution Prevention Plan (SWPPP) to be administered throughout all phases of grading and project construction. The SWPPP would incorporate Best Management Practices (BMPs) to ensure that potential water quality impacts during construction phases are minimized. Examples of BMPs that may be implemented during site grading and construction could include straw hay bales, straw bale inlet filters, filter barriers, and silt fences. This measure would reduce potential construction impacts to water quality to a less than significant level. The site owners would bear ultimate responsibility for compliance with the terms and conditions of the NPDES General Construction Activity Storm Water Permit. The NPDES construction permit application approval conditions set forth by the City would dictate the actual measures and requirements of the project SWPPP and any other provisions deemed necessary. These measures would be implemented to ensure that project construction activities would not result in a violation of State water quality standards and discharge requirements. The requirements set forth by the City would serve to reduce potential impacts that could result during grading and project construction phases to a less-than-significant level.

Long-term 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 Clean Water Act (CWA).

Response 5

The proximity of the Lent Ranch site to the Cosumnes River Preserve was considered during the preparation of the Draft EIR in evaluating the effects of the development. The distance, connectivity, habitat quality, and importance of the site was considered, and examined during the site reconnaissance. No direct impacts to the Preserve are expected to result from the Lent Ranch project, and because drainage from the site flows west away from the River, water quality was considered with respect to the Stone Lakes Wildlife Refuge rather than the Cosumnes River Preserve. The indirect impact of increased light and glare, as well as the cumulative loss of habitat and connectivity between habitats are identified on Draft EIR page 4.8-38 as unavoidably significant.

Response 6

Please refer to Draft EIR Section 4.0 for a description of the cumulative analysis methodology used in the Draft EIR. Cumulative development and impacts associated with each issue area are addressed within Sections 4.1 through 4.13 of the Draft EIR. In order to analyze the cumulative impacts of the project in combination with existing development and other expected future growth, the amount and location of growth expected to occur in addition to that of the proposed project must be predicted. Section 15130(b) of the *CEQA Guidelines* allows the following two methods of prediction: "(A) a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or areawide conditions." In order to analyze a worst-case condition, this EIR uses a combination of both methods to provide a comprehensive estimate of cumulative impacts. Growth forecasts for the project are based on the City's *General Plan* build-out model, which presumes buildout of land is consistent with current designations. The build-out model was enhanced in the area surrounding the Lent Ranch project site to also reflect the planned and approved development projects contemplated for the area. The combination of the project list method ("A" above) and the buildout projection method ("B" above) results in a worst-case future growth scenario.