

Appendix A

NOP and Comments

SACRAMENTO LOCAL AGENCY FORMATION COMMISSION/CITY OF FOLSOM NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING FOR THE FOLSOM CORPORATION YARD SPHERE OF INFLUENCE AMENDMENT AND ANNEXATION (LAFC #01-17)

Date: November 8, 2017

To: Responsible Agencies, Trustee Agencies, and Interested Persons

Re: Notice of Preparation of a Draft Environmental Impact Report for the Proposed Folsom Corporation Yard Sphere of Influence Amendment, Folsom General Plan Amendment, Annexation, and Prezone.

In accordance with the provisions of the California Environmental Quality Act (CEQA), the Sacramento Local Agency Formation Commission (LAFCo) and the City of Folsom (City) have determined that the proposed Folsom Corporation Yard sphere of influence amendment (SOIA), Folsom General Plan amendment, annexation, and prezone (SOIA/annexation) will require preparation of an Environmental Impact Report (EIR). The purpose of this Notice of Preparation (NOP) is to provide an opportunity for the public, interested parties and public agencies to comment on the scope and proposed content of the EIR.

This NOP initiates the CEQA scoping process. LAFCo and the City of Folsom will be co-Lead Agencies for preparation of the EIR. LAFCo will consider the SOIA as Lead Agency and, if approved, acts as the Responsible Agency for the annexation and the City of Folsom, if the SOIA is approved, will consider the general plan amendment and prezone the property prior to LAFCo's consideration of the annexation. The City and Landowner (Aerojet Rocketdyne Inc., and Ohio Corporation) are co-applicants on this project. Documents related to this SOIA/annexation request and EIR will be available for review on LAFCo's website at: <http://www.saclafco.org> and on the City's website at https://www.folsom.ca.us/city_hall/depts/community/planning/projects/default.asp. A printed copy may be reviewed during public business hours, 8:30 AM to 4:00 PM Monday-Friday, at the LAFCo offices, 1112 I Street, Suite 100, Sacramento, CA 95814. The printed copy is also available for public review at the Community Development Department at 50 Natoma Street, Folsom, California 95630 during business hours: 8:00 AM to 4:00 PM Monday-Friday.

PUBLIC SCOPING MEETING

LAFCo and the City will conduct one public scoping meeting to inform interested parties about the project, and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The public scoping meeting is scheduled for the following time and location:

Monday, December 4, 2017 (4:30 p.m. to 6:30 p.m.)

**Folsom Library Meeting Room
411 Stafford Street
Folsom, CA 95630**

PROVIDING COMMENTS ON THIS NOTICE OF PREPARATION

Written and/or email comments on the NOP should be provided at the earliest possible date, but must be received by 4:00 p.m. on December 8, 2017. Please send all comments on the NOP to:

Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814-2836

Attn: Mr. Don Lockhart, AICP, Executive Officer
Phone: (916) 874-2937
Fax: (916) 854-2939
E-mail: Don.Lockhart@SacLAFCo.org

If you are from an agency that will need to consider the final EIR when deciding whether to issue permits or other approvals for the project, please provide the name of a contact person. Comments provided by email should include the name and mailing address of the commenter in the body of the email.

Focus of Input

LAFCo and the City rely on responsible and trustee agencies to provide information relevant to the analysis of resources falling within their jurisdiction. LAFCo and the City encourage input for the proposed EIR, with a focus on the following topics:

Scope of Environmental Analysis. Guidance on the scope of analysis for this EIR, including identification of specific issues that will require closer study because of the location, scale, and character of the SOIA/annexation request;

Mitigation Measures. Ideas for feasible mitigation, including mitigation that could potentially be imposed by LAFCo and that would avoid, eliminate, or reduce potentially significant or significant impacts;

Alternatives. Suggestions for alternatives to the SOIA/annexation request that could potentially reduce or avoid potentially significant or significant impacts; and

Interested Parties. Identification of public agencies, public and private groups, and individuals that LAFCo and the City should notice regarding this SOIA/annexation request and the accompanying EIR.

PROJECT LOCATION

The project site is located, at the southeast corner of Prairie City Road and White Rock Road, just west of Scott Road in Sacramento County, California (Exhibit 1).

PROJECT BACKGROUND

In 2008, the City conducted a review of the existing corporation yard needs to determine whether existing facilities were adequate and, if not, what type of facilities would be needed to accommodate both the current city population and the City's projected build out identified in its general plan and from other foreseeable development.

The City's corporation yard operations are currently split among multiple sites. The main corporation yard is at the west end of Leidesdorff Street with additional yards located at the water treatment plant, a satellite yard storage area on Sibley Street, a yard adjacent to the Folsom City Zoo Sanctuary and Rodeo Park on Stafford Street, and a yard adjacent to the John Kemp Community Park and Folsom Sports Complex on Clarksville Road.

The main Leidesdorff Yard (5 acres of active use) is fully occupied and unable to support current requirements; thus, the City has developed other smaller corporation yard sites to meet current needs. Approximately 10 acres of additional space is available on the site of the former landfill for passive uses, but even with this available acreage, the existing sites cannot meet current and projected City corporation yard requirements.

PROJECT DESCRIPTION

1.1.1 Overview

The project is solely to facilitate the development of a new corporation yard for the City of Folsom which would be designated as Public and Quasi-Public Facility (PQP) and rezoned M-2 (General Industrial). If the SOIA is approved, consideration of the general plan amendment, prezone, and annexation would follow. If annexation is approved, the City would purchase the property in fee title and begin more detailed planning on the design of the corporation yard. While development of a corporation yard is not part of this project, it is a likely outcome of an SOIA, general plan amendment, prezone, and annexation, and therefore the impacts of a reasonable development scenario are described below and evaluated throughout the Draft EIR. The approximately 58-acre site would include 36.03 acres for the future corporation yard, 16.25 acres for SouthEast Connector right-of-way, and 5.12 acres to realign Scott Road. In addition, a 0.8-acre easement is included in the project but not in the SOIA/annexation area. This area would be used to provide access to Prairie City SVRA once the SouthEast Connector removes the current access

The City anticipates that it would realign Scott Road to connect to Prairie City Road and abandon Scott Road from north of the realignment to White Rock Road. Exhibit 2 shows the general outline of the proposed changes.

1.1.2 Types of Uses and Facilities

The City currently has a wide variety of uses at the current corporation yard locations. These uses would be shifted over to the new site and the existing Leidesdorff Yard would be emptied and left unoccupied. The new yard would be used by the following City departments: Parks and Recreation, Public Works, and Utilities. Table 1 shows the anticipated needs at city buildout (approximately 2050).

Table 1 Facility Needs (Buildout-2050)

Space Component	Staff	Enclosed Office/Shop/Warehouse SF	Exterior Covered SF	Exterior Open SF	Total SF
Parks and Recreation					
Park Maintenance	71	8,387	33,334	37,876	79,597
Public Works					
Street Maintenance	48	18,413	54,488	38,080	110,981
Transit	45	4,470	–	29,400	33,870
Utilities					
Administration	2	1,167	–	–	1,167
Fleet Management	24	31,717	1,190	16,940	49,847
Solid Waste					
Collections	59	4,100	–	319,902	324,002
Household Hazardous Waste (HHW)	–	4,500	2,240	8,935	15,675
Transfer Station	–	52,500	–	201,360	253,860
Utility Maintenance	22	4,309	4,760	33,048	42,117
Wastewater	24	5,838	4,760	10,242	20,840
Water	14	3,187	–	8,534	11,721
Water Treatment Plan - Plant Maintenance	5	6,785	2,940	4,385	14,110
Common/Shared					
Office Support	–	7,920	560	111,818	120,298
Field/Shop Support	–	21,096	13,096	37,414	71,606
Total	314	174,389	117,368	857,934	1,149,691
Gross Building Area (GSF) (NSF @ 87.5%)	–	199,301	–	–	199,301
Total Yard Area	–	–	117,368	857,935	975,303
Site Circulation, Landscaping, Setback (@35%, 25%, 25%)	–	69,755	29,342	214,484	313,581
Total	–	269,056	146,710	1,072,419	1,488,185

Source: City of Folsom 2008

The new yard could also house facilities for other departments; however, at this time, no additional information is available to describe the potential area or types of facilities that could be needed. Therefore, this EIR does not include uses that are not explicitly described in the project description.

At buildout, the City estimates it would need 174,389 net square feet (nsf) of built space, including 38,739 nsf for office and support space, 27,155 nsf for warehouse and enclosed storage space, 27,155 nsf for shops and other specialized use spaces, and 52,500 nsf for a solid waste transfer station and material recovery facility. This EIR assumes that these amounts of facility space would be constructed by buildout of the corporation yard in 2050.

1.1.3 Access

The SouthEast Connector is planned to use right-of-way centered around White Rock Road. While the ultimate plan for the SouthEast Connector includes an overpass at the Prairie City Road intersection with White Rock Road, the SouthEast Connector assumes an interim, Phase 1, alignment which would include shifting the intersection east and adding a frontage road connection from this intersection to Scott Road.

Depending on when the corporation yard is built, there are multiple options for the City to provide access for its vehicles. The EIR will evaluate four access options that may be used depending on whether the SouthEast Connector is built or after before the corporation yard. Elements of these options include extending Prairie City Road south of the existing intersection with White Rock Road, realigning and abandoning portions of Scott Road, and incorporating the SouthEast Connector's Phase 1 and/or ultimate buildout.

1.1.4 Construction Schedule

If the project and its entitlements are approved, the City anticipates it would begin construction of the corporation yard no sooner than 2021 and likely, not until 2024. Construction is anticipated to last 24 months and include the following construction phases:

- ▲ excavation/shoring,
- ▲ utilities installation,
- ▲ building construction,
- ▲ Scott Road realignment,
- ▲ paving, and
- ▲ Scott Road abandonment.

1.1.5 Use of Existing Corporation Yard Site

If the project is approved, at the time detailed site plans are developed and approved, the City would move and consolidate the existing corporation yard activities to the new site. The Leidesdorff Yard would not house any corporation yard activities. The City has no current plans for using the site if the corporation yard activities are moved to the new site. Once the new corporation yard becomes operational, the City would begin a public process of reviewing possible other uses for the Leidesdorff Yard site. This document assumes that no additional uses would be allowed at the Leidesdorff Yard site until, and unless, the City conducts a public planning and outreach process and associated environmental review of any potential reuse of that site.

POTENTIAL ENVIRONMENTAL EFFECTS

LAFCo and the City have reviewed the project application, as required by Section 15060 of the CEQA Guidelines, and have determined that an EIR should be prepared. As required by CEQA, the EIR will describe existing conditions and evaluate the potential environmental effects of the proposed project and a reasonable range of alternatives, including the no-project alternative. It will address direct, indirect, and cumulative effects. Consistent with LAFCo requirements, the EIR will consider the extent to which the project will promote environmental justice. The EIR will also discuss potential growth-inducing impacts, and summarize significant and unavoidable environmental effects. The EIR will identify feasible mitigation measures, if available, to reduce potentially significant impacts. At this time, LAFCo and the City have identified the potential for environmental effects in the areas identified below.

Aesthetics. The SOIA/annexation would facilitate development of a corporation yard which would replace an undeveloped parcel containing grassland. This section will describe how implementation of a corporation yard could change the view of the site from nearby viewpoints. The analysis will also include a discussion of light- and glare-related impacts. Mitigation will be recommended to reduce or eliminate project impacts, where appropriate and feasible.

Agriculture. According to the Natural Resource Conservation Service, Sacramento County Important Farmland Map, the project site is identified as Grazing Land. The site is in nonrenewal for a Williamson Act contract. The Agricultural Resources section of the EIR will evaluate environmental impacts associated with conversion of grazing land to urban uses, as well as the project's consistency with policies of the County's and City's General

Plan protecting farmland resources. In addition, the analysis will evaluate whether the proposal would be consistent with LAFCo policies pertaining to agricultural resources as identified in Sacramento LAFCo Policies, Standards, and Procedures Guidelines. This section will also carefully evaluate conflicts between the proposed urban uses and nearby grazing operations. This includes both environmental impacts to the proposed urban uses, as well as indirect loss of farmland because of proximity of potentially incompatible urban uses. The analysis will also include an evaluation of open space resources as defined by Government Code Section 65560 that are located within or adjacent to the project area and the countywide trend of open space loss. Mitigation will be recommended to reduce or eliminate project impacts, where available.

Air Quality. The EIR will include a description of existing air quality conditions within the project area and the nearby vicinity. This will include information on the location of existing sensitive receptors and emissions sources, ambient air quality concentration data from the most representative air quality monitoring station(s), attainment designations, and natural factors that relate to the transport and dispersion of air pollutants. Based on the City's projected scenario to use this site as a corporation yard, the section will analyze the potential for operational mobile-source emissions as a result of future development to violate or contribute to a local carbon monoxide hot spot that exceeds the ambient air quality standards, the potential for existing and potential sensitive receptors to be exposed to unhealthy levels of toxic air contaminants generated by construction activity, and the potential exposure of sensitive receptors to odor sources. Projected increases in criteria air pollutants, precursors, and exposure to toxic air contaminants and odors will be compared to applicable thresholds recommended in the Sacramento Metropolitan Air Quality Management District's 2015 CEQA Guide to Air Quality Assessment.

Biological Resources. This section will describe the potential for special-status plants, animals, and habitat to occur in the project area, as well as the project's potential to facilitate development that could adversely affect identified biological resources directly or indirectly. This will include reviewing documentation pertaining to habitat requirements for special-status species potentially occurring near the SOIA area, the species data provided by U.S. Fish and Wildlife Service and California Department of Fish and Wildlife, and both the California Native Plant Society's Inventory of Rare and Endangered Plants of California and the California Natural Diversity Database. The EIR will also review the species and community accounts prepared in support of the South Sacramento Habitat Conservation Plan and address whether future development of the project area could affect implementation of the plan.

Cultural Resources and Tribal Cultural Resources. A record search will be provided via the North Central Information Center. Any tribal or other cultural resources that are known or have the potential to occur on the project site will be assessed, and the potential impacts that may occur to known and unanticipated resources because of project implementation will be evaluated. The EIR will document the results of AB 52 and SB 18 consultation and any agreements on mitigation measures for California Tribal Cultural Resources.

Energy. This section will describe the existing energy setting in terms of local supply, consumption levels, and current energy standards. The EIR will evaluate the energy impacts of the operation of the corporation yard.

Greenhouse Gases and Climate Change. This section will assess the potential for construction- and operation-related greenhouse gas emissions associated with corporation yard development. In addition, this section will qualitatively discuss potential adverse impacts to corporation yard development because of climate change and the ability for the corporation yard development to adapt to these effects.

Hydrology and Water Quality. The section will describe the existing drainage and water quality conditions of the site, provide a description of the applicable regulatory environment, and will evaluate the project's hydrology and water quality impacts including: short-term construction-related effects; permanent stormwater changes; impacts to groundwater quality and quantity; and cumulative on- and off-site impacts. The EIR will also address the potential for development.

Land use and Planning. The EIR will consider whether the project is consistent with applicable policies, plans, and regulations, including the Sacramento County General Plan, SACOG Blueprint, Metropolitan Transportation Plan/Sustainable Communities Strategy, and the South Sacramento Habitat Conservation Plan.

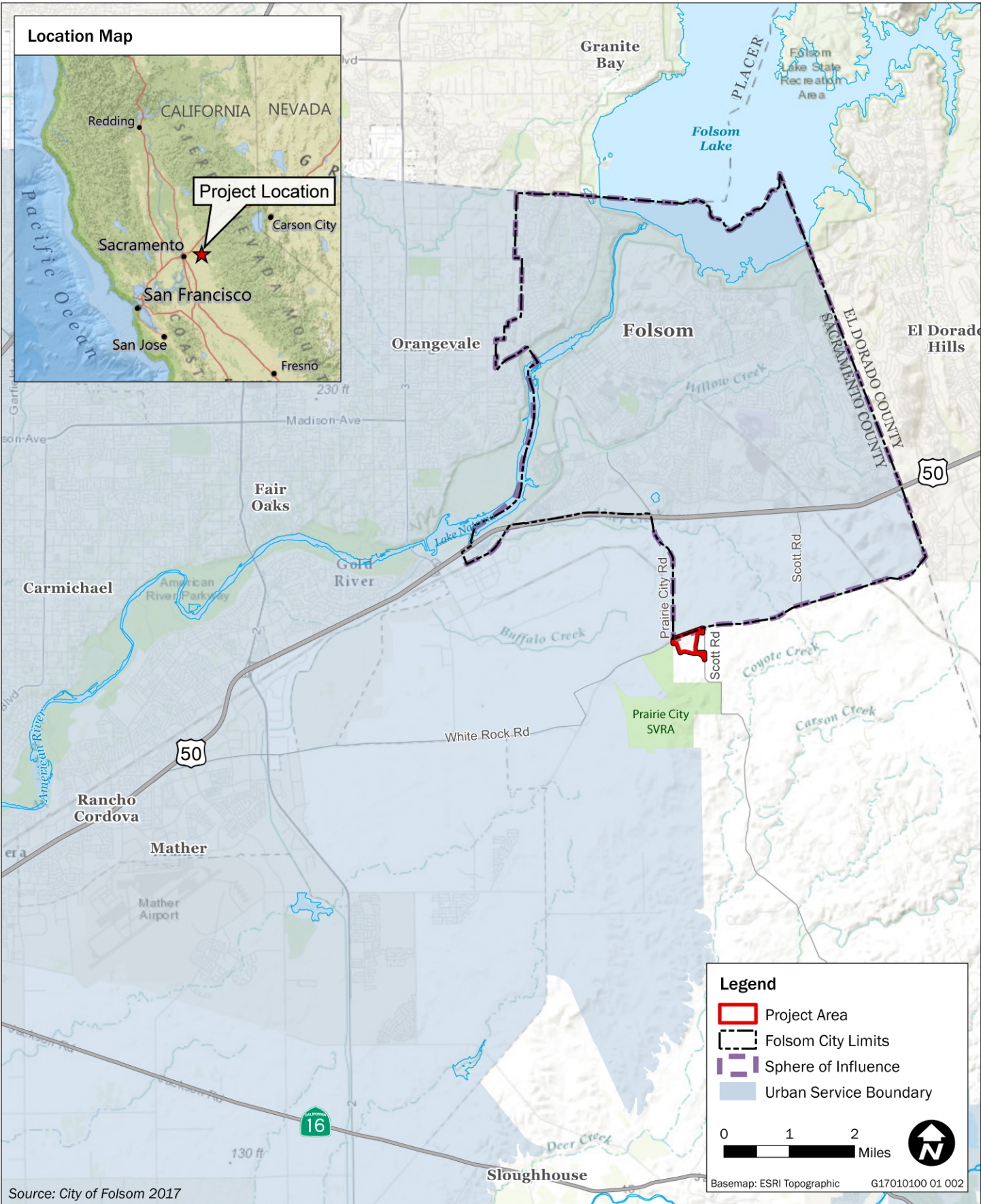
Noise and Vibration. This section will include information on the location of existing sensitive receptors, ambient levels, and natural factors that relate to the attenuation thereof. This information will be based on existing documentation, site reconnaissance data, and the use of prediction methods. The EIR will assess noise impacts that would be anticipated to occur with construction and operational activity associated with the development of the project area.

Population, Employment and Housing. The EIR will discuss any potential effects on housing, especially affordable housing. Currently, the site is vacant; however, consistent with LAFCo requirements, the EIR must disclose whether there are existing or planned affordable housing resources on the project site.

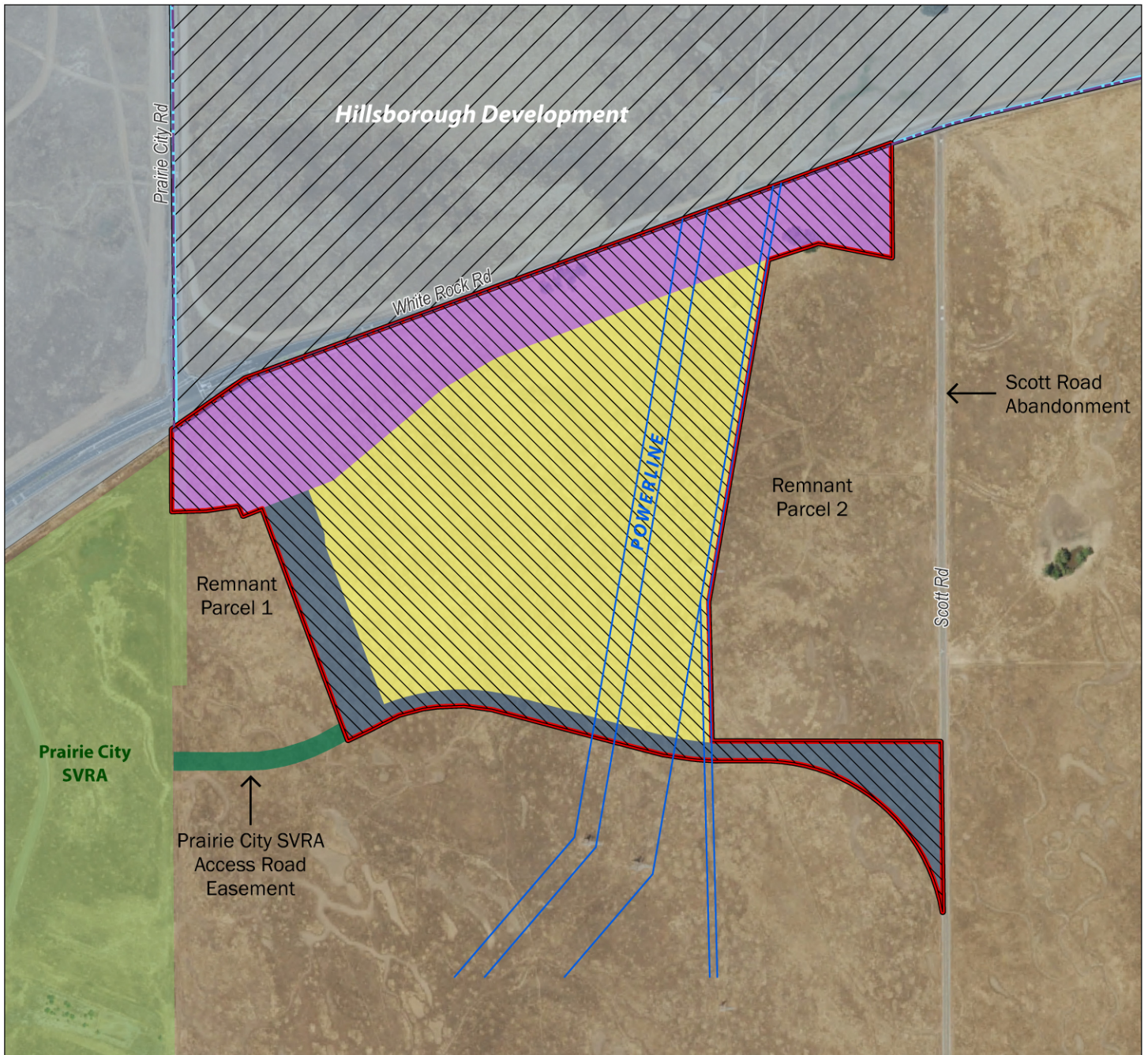
Transportation and Traffic. The EIR will summarize any available data on traffic patterns and levels of service in areas that could be affected by the potential development of the proposed project area. Planned improvements identified in current planning and environmental documents will be noted. Existing transit services will be described. The EIR will identify future traffic conditions and improvements near the project area based on existing planning and environmental documents, such as the City of Folsom's General Plan and the Sacramento Area Council of Governments' 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy. The analysis will conceptually describe transportation-related impacts associated with potential development of the project using information generated through air quality modeling of the land use holding capacity assumptions (which also produces trip generation information).

Utilities. This section will focus on the provision of utilities to the site, the potential need to extend utilities and the potential for environmental impacts to result because of exceedance of capacity or expansion of facilities. The analysis will provide an evaluation of projected utility demands and the facilities and supplies that would be needed to meet those demands. The analysis will focus on the capacity of water, wastewater treatment/sewer, and electric/gas facilities. The evaluation will assess whether the City and any other service providers have (1) the service capability and capacity to serve the project site, and (2) whether they can provide services to the project without adversely affecting existing service levels elsewhere in their service areas. The assessment will include coordination with utility service providers to confirm demand projections for projected uses. The City anticipates sizing the utilities appropriately and not providing more than is needed for corporation yard uses so that the expansion of utilities would not induce growth.

The EIR will summarize any benefits to the environment or public resulting from relocation of the corporation yard, as well as detrimental impacts, if any.



Source: City of Folsom 2017



Legend

Powerline Easement	Project Area
Capitol SouthEast Connector Right-of-Way	Existing Parcel Boundary
Proposed Corporation Yard Site	Folsom Plan Area Specific Plan
Scott Road Realignment	Folsom City Limits/Sphere of Influence
FPASP Hillsborough Development Area	Urban Service Boundary
Future SOI/City Boundary	

0 250 500 Feet

Source: City of Folsom 2017, Sacramento County 2016

Aerial: NAIP 2016

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Exhibit 2

Elements of Project Site



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Comment Number	Name of Author, Agency/Organization	Date Received	Environmental Issue	EIR Section
Oral Comments and Speaker Card Comments Received at the Public Scoping Meeting				
	Laurette Laurent	12/4/2017	Commenter would like to see engineer approved water plans showing a non-American River water source for the South of 50 area, including the project site	Hydrology and Water Quality
Written Comments				
	Laurette Laurent	12/4/2017	The commenter is concerned about the City's ability to supply water and sewers to the area. It currently is not supplied water and the commenter says there was not an engineer available at the meeting to explain how the water would be supplied to the area. The commenter is also concerned about American River water being used in excess. It is a major point of contention that the site needs to be supplied with a "non-American River water source for all land south of 50."	Hydrology and Water Quality
	Laurette Laurent	11/8/2017	<p>The commenter raises the issue of the NOP not appearing on CEQA Query, OPR listing and circulation. It could cause issues with the NOP comment period if it isn't listed because nearby residents and other agencies have interests and might not be able to see the NOP. Another point raised by this commenter was the legal water supply to the area. LAFCO must guarantee compliance with Folsom City Charter and CA laws governing Special Districts with regards to water. The commenter says the City of Folsom cannot provide legal water services and sewage services for existing lands south of Highway 50.</p> <p>Issues were raised with EID water and sewage service areas. EID Engineer Brian Mueller says the project site is within EID service area but the EID website contradicts this statement. The RWQCB revealed unacceptable levels of E-Coli in the American River below Folsom's "inadequate sewer pipes" that presents a concern for residents. The City of Folsom and LAFCO need to provide a source of water other than the American River for the project site.</p>	General, Hydrology and Water Quality
	Jeanne Sission, California State Parks,	11/21/2017	The commenter works for the neighboring Prairie City State Vehicular Recreation Area and was concerned with aesthetics the project site would be visible from some of the Prairie City trails. There was also	Aesthetics, Air Quality, Biological

Comment Number	Name of Author, Agency/Organization	Date Received	Environmental Issue	EIR Section
	Prairie City SVRA Sector Superintendent		concern for potential wildlife viewing. The areas near the project site are considered Vernal Pool Management Areas in the SVRA General Plan and are identified as non-motorized recreation areas. The commenter wanted SacLAFCo to be made aware of this issue. The commenter also wanted to point out the sound and dust that are byproduct of OHV recreation so the City of Folsom can be aware of these byproducts getting onto the project site. The commenter would like to be updated on progress of the project	Resources, and Noise.
	Sharaya Souza Staff Services Analyst Native American Heritage Commission	11/30/2017	<p>This comment goes over the details of AB 52 and how that relates to this project. The commenter explains the various aspects of the bill and then makes recommendations for moving forward with the project. They recommend SacLAFCo and the City of Folsom do the following:</p> <ul style="list-style-type: none"> • Contact the appropriate regional California Historical Research Information System Center for an archaeological records search. • If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. • Contact the Native American Heritage Commission (NAHC) for a Sacred Lands File search and a Native American Tribal Consultation List of appropriate tribes for consultation. • Remember that the lack of surface evidence of archaeological resources does not preclude their subsurface existence 	Cultural Resources and Tribal Cultural Resources
	Stephanie Tadlock California Valley Regional Water Quality Control Boards	11/30/2017	<p>The RWQCB had comments addressing concerns regarding antidegradation. All wastewater discharges must comply with the Antidegradation Policy in the Basin Plan. The RWQCB also made note of the permitting requirements the project will need. These permits include:</p> <ul style="list-style-type: none"> • Construction Storm Water General Permit • Phase I and II Municipal Separate Storm Sewer System Permits • Industrial Storm Water General Permit • Clean Water Act Section 404 Permit • Clean Water Act Section 401 Permit • Water Discharge Requirements • Dewatering Permit 	Hydrology and Water Quality, Utilities

Comment Number	Name of Author, Agency/Organization	Date Received	Environmental Issue	EIR Section
			<ul style="list-style-type: none"> • Regulatory Compliance for Commercially Irrigated Agriculture • Low or Limited Threat General NPDES Permit • NPDES Permit 	
	Kamal Atwal Associate Transportation Engineer at County of Sacramento Department of Transportation	12/5/2017	The Department of Transportation had comments regarding the sphere of influence limits extending beyond the easterly most extension to the existing Scott Road. They suggest a proposed roadway easement for the future realignment of Scott Road. Another comment they had was regarding the segment of Scott Road between White Rock Road and Latrobe Road as a Scenic Corridor and want to be sure the environmental document will consider how that would be impacted by construction. They suggest an alternative where the location of the corporation yard be moved so as to not impact this scenic corridor. The commenter states that the proposed corporation yard use White Rock Road to get the large and heavy vehicles into the site as opposed to Scott Road. There are many concerns regarding Scott Road including intersection layouts, realignment of the road, and the scenic corridor designation of Scott Road. The Department of Transportation suggests a traffic study be coordinated with County Staff for review and comments.	Aesthetics and Traffic and Transportation
	Sarena Moore Regional San/SASD Policy and Planning	12/1/2017	Regional County Sanitation District (Regional San) comments request the City of Folsom provide local sewer service to the project site. The project site is currently outside the Sacramento County Urban Services Boundary. In order for Regional San to provide sewer services, the property must be annexed into their service area. They request that on-and off-site environmental impacts associated with extending sewer services to the project site be analyzed.	Utilities
	Kelsey Vella CDFW	12/7/2017	The CDFW suggests three steps to evaluate the impacts: habitat assessment, detection surveys, and impact assessments. The commenter also requests the document include analysis of wetlands, vernal pools, perennial intermittent, and ephemeral rivers, streams, and lakes. Mitigation measures should be developed to reduce impact to a less than significant level and insure there is no net loss of habitat value. The commenter also reminds that a Notification of Lake or Streambed	Biological resources

Comment Number	Name of Author, Agency/Organization	Date Received	Environmental Issue	EIR Section
			Alteration must be submitted by the applicant to CDFW if the project could impact streams, rivers, or lakes.	
	Jamie Cutlip Regional & Local Government Affairs at SMUD	12/7/2017	<p>The Sacramento Municipal Utility District request the environmental document acknowledge impacts related to the following:</p> <ul style="list-style-type: none"> • Overhead and/or underground transmission and distribution line easements; • Utility line routing; • Electrical load needs/requirements; • Energy efficiency; • Climate change; and • Cumulative impacts related to the need for increased electrical delivery <p>SMUD also offers input regarding of project related impacts on existing of future SMUD facility and if there are any conflicts relating to SMUD facilities.</p>	Utilities, Energy, Climate Change
	Laurette Laurent	12/8/2017	This commenter had issues with the map sizes at the public workshop meeting because it was difficult to see if there was contamination of groundwater. There was request for larger maps so as to better see where the groundwater contamination is located	Hydrology and Water Quality, Hazards and Hazardous Materials.

Lockhart. Don



From: Vella, Kelsey@Wildlife <Kelsey.Vella@wildlife.ca.gov>
Sent: Thursday, December 07, 2017 2:56 PM
To: Lockhart. Don
Cc: Wildlife R2 CEQA
Subject: Request for Comments - Folsom Corporation Yard Sphere of Influence Amendment and Annexation

Good afternoon Don,

Thank you for the opportunity to review and provide comments on the Notice of Preparation Folsom Corporation Yard Sphere of Influence Amendment and Annexation in Sacramento County.

CDFW generally recommends three progressive steps in evaluating project impacts: habitat assessment, detection surveys, and impact assessment in evaluating whether projects will have impacts to special status species. The information collected from these steps will inform any subsequent avoidance, minimization and mitigation measures. Habitat assessments are conducted to evaluate the likelihood that a site supports wildlife species and their habitats. Detection surveys provide information needed to determine the potential effects of proposed projects and activities on those species and habitats.

Impact assessments evaluate the extent to which wildlife species and their habitat may be impacted directly or indirectly, on and within a reasonable distance of proposed CEQA project activities. CDFW recommends that adequate mapping of the habitat is conducted. The environmental analysis (and any surveys) should be completed by qualified personnel with sufficient experience in the wildlife and habitats associated with the project.

The CEQA document should include environmental analysis to identify all wetlands, including vernal pools, perennial, intermittent, and ephemeral rivers, streams, and lakes within the Project footprint and any habitats supported by these features such as, but not limited to riparian habitats. The environmental analysis should identify impacts to fish and wildlife resources dependent on those hydrologic features and habitat types. The analysis should overlay all project activities over the habitat types and hydrologic features to determine where and to what extent they overlap. And finally, use the overlapping areas to estimate, by habitat type, the acreages that will be temporarily and/or permanently directly, indirectly or cumulatively impacted by the proposed Project.

Mitigation measures should then be developed to reduce the Project's impacts to less than significant and insure there is "no net loss" of habitat value. This could consist of compensatory mitigation in the form of fee title acquisition with a conservation easement to protect habitat or purchase of in-kind credits at a CDFW approved mitigation bank.

Additionally, a Notification of Lake or Streambed Alteration (LSA) must be submitted by the project applicant to CDFW (pursuant to Fish & Game Code section 1602) if the project could result in a substantial alteration of the bed, bank, and/or channel of a river, stream, or lake. Any resulting LSA Agreement would include measures to minimize impacts and restore riparian habitat. As a responsible agency under CEQA, CDFW must rely on the lead agency's CEQA analysis for the proposed project when exercising our discretion after the lead agency to approve or carry out some facet of a project, such as the issuance of a LSA Agreement. Therefore, if it is determined that the projects would impact the bed, bank, and/or channel of a river, stream, or lake, mitigation measures to avoid, minimize, and mitigate impacts to these resources should be identified. More information on LSA Agreements can be found at the following link:
<https://www.wildlife.ca.gov/Conservation/LSA>.

Please let me know if you have any questions.

Thank you!

Kelsey Vella
Environmental Scientist
California Department of Fish and Wildlife
1701 Nimbus Road
Rancho Cordova, CA 95670
(916) 358-4315



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

30 November 2017

Don Lockhart
Sacramento LAFCO
City of Folsom
1112 I Street, Suite 100
Sacramento, CA 95814

CERTIFIED MAIL
91 7199 9991 7036 6996 5474

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, FOLSOM CORPORATION YARD SPHERE OF INFLUENCE AMENDMENT AND ANNEXATION PROJECT, SCH# 2017112020, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 08 November 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation of the Draft Environmental Impact Report* for the Folsom Corporation Yard Sphere of Influence Amendment and Annexation Project, located in Sacramento County.

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

I. Regulatory Setting

Basin Plan

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

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

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCCE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:

http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

In part it states:

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

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

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

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit

requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

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

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

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Caltrans Phase I MS4 Permit, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/caltrans.shtml.

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

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

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

Clean Water Act Section 404 Permit

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

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

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

Waste Discharge Requirements (WDRs)

Discharges to Waters of the State

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

Land Disposal of Dredge Material

If the project will involve dredging, Water Quality Certification for the dredging activity and Waste Discharge Requirements for the land disposal may be needed.

Local Agency Oversight

Pursuant to the State Water Board’s Onsite Wastewater Treatment Systems Policy (OWTS Policy), the regulation of septic tank and leach field systems may be regulated under the local agency’s management program in lieu of WDRs. A county environmental health department may permit septic tank and leach field systems designed for less than 10,000 gpd. For more information on septic system regulations, visit the Central Valley Water Board’s website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/owts/sb_owts_policy.pdf

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Dewatering Permit

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

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

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

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

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other

action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf


For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

NPDES Permit

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

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or
Stephanie.Tadlock@waterboards.ca.gov.



Stephanie Tadlock
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

To: Don Lockhart CEO SacLAFCO

cc: SWRCB, RWQCB, SacSewer Planning, SACOG

From: Laurette Laurent

Nov. 8, 2017

Re: Public Notice No 640 #01-17 Folsom Corporation Yard, "SOIA Amendment & Annexation"

LAFCO-Folsom "Co-Lead Agencies" One scoping meeting Dec. 4 4:30-6:30 pm Folsom Library
411 Stafford St. (next to city hall, 50 Natoma)

This NOP notice of preparation does not appear on CEQA Query, OPR listing and circulation. Does that vitiate NOP? Do purported residents and other agencies have interests?

Prior to LAFCO involvement in ANY expansion south of Highway 50, [FPA, Aerojet land, land abutting El Dorado County, will LAFCO consider laws protecting all users of American River water NORTH of Highway 50 (including El Dorado, Placer, Sacramento Counties)? It is imperative LAFCO guarantee compliance with Folsom City Charter (Measure Water), and CA laws governing Special Districts.

How can you approve further expansion Folsom, south of White Rock Road, when it cannot even provide legal water services and sewage conveyance services for existing S50 lands? Is this a ploy to develop the unstable Corporation Yard land adjacent to the federal American River assets? Is this an attempt to undercut nascent Folsom residents group wishing to obey the General Plan regulations for current Corp Yard 26 acres? A recent court decision altered Folsom's direction on Historic District development not in concert with Folsom General Plan.

How can a very distant, very large Corporation Yard operate – lacking legal water supply and sewage conveyances to SRCSD? Or is another Aerojet deal? If Folsom cannot provide water and SSS pipes to south of White Rock Rd., what is the point of this "SOIA Amendment/Annexation"?

Folsom council has approved construction of "Folsom Heights" or "Folsom Ranch" [whatever name] almost 200 acres of previously annexed Folsom city, S50. Folsom intended to have a road from this large single-family development into El Dorado County. Hundreds of El Dorado County residents objected to this road. It's real purpose: Prima Drive access, is/was for all construction, and services.

EID Engineer Brian Mueller has told EDC and Sacramento, Folsom residents that Measure W is not binding upon EID, and EID will indeed provide both EID American River water and raw sewage treatment services to this downhill section of city of Folsom. He stated repeatedly: "land is in our (EID) service area." He told water experts there is a "bump-out" of EID into abutting county and city land. But EID website repeatedly contradicts this stating "western boundary of El Dorado Irrigation District is Sacramento-El Dorado County line." Mr. Mueller refused to bring this item to EID Board of Directors or public who are the paying members of this Special District formed for and by "local" residents only. Developers won't even pay for raw sewage lift stations.

Citing state laws governing special districts, and laws cited at EID it is obvious there is NO enabling Legislation for a special district to "dis-annex" part of an urban water district in another county. Dis-annexing was not a LAFCO stipulation as Mueller states. Sac Sewer has a vested right to know its revenue stream and jurisdiction are protected by all legal agencies. Water: RWQCB has revealed unacceptable levels of E-Coli have existed in American River directly below **Folsom's inadequate sewer pipes**, for at least 5 years.

All urban water service, and waste water service providers for urban areas are restricted by another set

of laws, which govern Bonding, Funds, Taxation, Drought emergency measures, and federal Urban Water Management Plan Requirements. There is no evidence EID has ever complied, even though Reclamation permitted a Warren Act Contract to EID for Project 184 American River water to serve burgeoning El Dorado Hills. This was is **only delivered at Folsom Reservoir** and no other point for term of contract. Impact is to add more urban development demands upon the American River extracted from Folsom Reservoir -- delivered (if this EID-Folsom ploy succeeds) from a greatly reduced water supply for existing users.

As a matter of LAFCO history, your records contain no copy of the "MOU" in which Folsom's annexation S50 was **guaranteed all water would come from the Sacramento River**. Folsom records quote it, but **LAFCO could not** produce MOU for Public Records Request. There have been substantial changes in land ownership, so Folsom chose American River water despite our water law. EID is suddenly claiming it has always had domain over large acres in question, despite their legally sworn audits stating otherwise.

Will LAFCO assist the city of Folsom to add more land to the S50 city, despite having no legal water supply and no provision for raw sewage conveyance to Sacramento Regional CSD Wastewater Treatment Plant? Did EID special district notify & obtain approval of EID members?

Will LAFCO permit a taking of American River water disallowed by laws?

Will LAFCO fail to consult the federal, state, and local oversight agencies for their input on the "**dis-annexation**" of portions of Folsom's city Service Districts (i.e. water and sewer)?

Will LAFCO obtain Return Receipt Registered Certificates for notifying the agencies whose districts & Oversight include all of the city of Folsom?

Will LAFCO join in seeking active enforcement of "Folsom CA NPDES Permit Folsom sanitary sewage conveyance pipes"? Or will you favor further growth & development at the very obvious expense of the American River water, its users, habitat, agricultural benefits, and need for protections under the laws?

Attached is a copy of State Water Resources Control Board demand letter to city of Folsom dated May 11, 2017. Folsom replied with many hundreds of pages of "legalese", but not even a single Engineer-Certified Report showing a "Non American River Water supply for S50." Given the city's failure to respond appropriately, and to contradict SWRCB Dept. of Water Rights expert Engineers' opinions, does LAFCO really wish to enter this fray?

Until city of Folsom complies with both letter and spirit of laws protecting all American River users, LAFCO would be ill-advised to create another tacit "MOU" giving Folsom American River water. This is direct defiance of Measure W, Folsom City Charter because AR water = AR water, whether delivered out of Folsom Reservoir by Folsom water district or EID.

Do not permit Folsom to expand when there is absolutely no Certified, stable, Legitimate Non-American River water supply for all of Folsom south of Highway 50. LAFCO, lobby for vigorous enforcement of the Folsom SSS pipes NPDES Permit.

If you have questions, please ask. But do mandate Folsom "authorities" to prove compliance with Measure W section of City Charter, and watch all Special Districts violating it, very carefully.

It is strongly recommended you and your staff review this document, and explain it to city of Folsom. By what right does LAFCO presume to combine actions when there are legal misdeeds; fail to Register NOP with CEQA Query; and fail to directly contact water, sewage, transportation, other entities impacted?

http://www.opr.ca.gov/docs/LAFCOs_GeneralPlans_City_Annexations.pdf

Ref.

Senate Bill 244 (Chapter 514, Statutes 2011, Wolk) regs.

Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, as Amended, Title 5, Division 3, Part 2, California Government Code

care to guide the actions of the LAFCOs by providing Statewide policies and priorities (Section 56301), and by establishing criteria for the delineation of spheres of influence (SOIs) (Section 56425).

http://resources.ca.gov/ceqa/cases/1975/bozung_010775.html

From: LJ Laurent [<mailto:ljl Laurent@att.net>]

Sent: Monday, December 04, 2017 8:43 AM

To: Yahooogroups

Cc: Lockhart. Don; Bill Sullivan; Dale Kasler; Ben Van Der Meer; Pamela@Waterboards Creedon; andrew.altevogt@waterboards.ca.gov

Subject: LAFCO hearing today 4:30 to 6:30, Folsom annexing S of White Rock Rd.

It's all about TRUTH in law and Water, folks. This is a Measure W and Folsom City Charter TEST. Will our water law be violated?

"Public Scoping Meeting"

LAFCO-Folsom "Co-Lead Agencies"

**will conduct scoping meeting Dec. 4 TODAY
4:30-6:30 pm Folsom Library 411 Stafford St.**

Reminder that LAFCO (Local Agency Formation group for Sac County) is having a public hearing today.

This is a Joint Operation between LAFCO and city of Folsom to permit city to annex a very large portion of Aerojet land SOUTH OF WHITE ROCK Rd. (which is south of current S50 city). City claims this distant, isolated, probably polluted land, is where city wishes to put NEW CORPORATION YARD.

If you cannot make it, you can send comments to LAFCO chief Mr. Don Lockhart who is cc'd here.

I have asked if an engineer will be present to provide:

HARD, Certified, PROOF the city has a "Non-American River Water source" for all South of 50 FPA, and this additional extension south of White Rock Rd.

LAFCO has not replied.

Hope you will share this with interested parties.

LJ Laurent

To: Sac LAFCO Director Lockhart
cc: Folsom City Clerk, for File
From: LJ Laurent
December 4, 2017

Re: Folsom buy 60 more Aerojet acres for corp yard site 3

Mr. Lockhart,

It is understandable why no LAFCO person was at the newest Folsom annex/SOIA meeting today. The "advisors" from an "environmental company" were totally misinformed on the whole South of 50 question. The city sent a planner with no engineering credentials. The land owners selling Aerojet 60 acres were represented by a man who refused to identify himself to me. He contented himself with speaking over every single concern I expressed. James Ray identified himself as a licensed engineer for the owners, but his business card lacks his Eng. License #. He was not able to address any engineering concern I fought to discuss.

Attendees were outnumbered by uninitiated: One old timey past office-holder in the city signed in earlier; rest of the attendees were all from Lake Natoma Shores. I was told that water and sewer are of absolutely no interest for this meeting. I was told they were doing a new EIR, but that directly contradicts the Public Notice of adding onto the old (worthless EIR) for S50. Aerojet rep stated the owners were going to use American River water because a lawsuit stated the city had "abided with Measure W" -- "new water source." That man has no idea the Judge Cadei's ruling (He's a Motion Judge) was NOT concerned with water -- all the laws cited were the state financing and bond-issuing laws. The "Folsom lawsuit" is used as a ruse -- claiming that a ruling all the financial/funding/bonding laws were complied with -- meant city could take all the American River water (or any public water) it wished. Judge Cadei would be chagrined at this misuse.

It was disgusting to be talked-over constantly by people with no judicial, legal, or engineering expertise. Un-named Aerojet rep repeatedly interrupted me to say all the City Engineer Approved Blueprints and plans were available to me online. That is NOT TRUE. I have submitted more than 2 dozen Public Record Act Requests for the entire schema of S50, FPA Infrastructure plans. City said they use a "backbone infrastructure" approach, and there were no CE Approved plans for the entire schema. City also refused to give me PRA records PROVING there was a "new water source." I recall the Folsom MOU with AKT: LAFCO has no copy of it. It promised Sacramento River water from AKT land, but he sold out all his multi-county holdings several years ago, one day.

If LAFCO does not revisit the water issue openly, with only Licensed CA Engineers' Approved Reports, then LAFCO will appear as one with the city. The meeting was an insult, and I understand why Sac LAFCO as "co-lead agency", declined to attend. Please re-read your copy of the Waterboard water rights division demand letter -- and do not presume a LAFCO can proceed in violation of existing water protection laws.

I spoke with another sophisticated attendee, and was told that more city nonsense and obfuscation was expected -- and delivered. This is not about a corporation yard which is miles away from water, sewage conveyances, roads, and residents it serves. Paying Aerojet, Easton, or anyone, for more badlands is wrong. We own an Aerojet Superfund site already, bought from Aerojet for corp yard purpose.

Strangely, the engineer and rep for Aerojet seemed blank when asked if they read the May 11, 2017, Water Rights demand letter for a "non-American River water source" for all land south of 50.

This was an appalling display of marginal "professionals" conducting a meeting to "inform."

Nonsense in writing includes:

Citing the defunct "southeast connector" with respect to this additional corp yard site as a plus. SE connector is dead except in a few febrile land-minds.

Someone decided a full EIR was required, but the Public Notice said this was a mere "addition" to the ancient South of 50 EIR. In this regard, someone needs to remind Folsom the last EIR was so dire that SOIA/Annexation was stalled for well over a decade. Now there is drought added to the mix, so any reasonable person can see a realistic EIR will conclude this remote **2nd** corp yard location to be bought from Aerojet (again) is pure poppycock.

Being downwind, there seems to be a stench in the air. As a resident, I do not wish to pay for another pre-determined EIR, nor a spurious 3rd corp yard site. Residents interests are not identical with "land owners" bottom line desires. Moreover, economies are achieved by contracting with responsible private providers of garbage collection, waste, recycling. City already has converted to private contracts for maintenance of infrastructure, and construction of new.

This 3rd corp yard is about money and city fees -- nothing more. Water is the sole consideration before another teaspoon of S50 land is broken.

May I respectfully request LAFCO do another search for the MOU on "new water source" which caused annexation south of 50 in the first place. You did not find it for my formal PRA Requests, but water is not so trivial you can repeat past mistakes without acknowledging and correcting them.

My friends also wish you to consider the devastating impact Folsom's proposals would have upon the inadequate roadway systems. I wish you to consider the city has no Sanitary Sewer Conveyance pipes of adequate size, continuously along Folsom Blvd., adjacent to American River. Consider need for enforcement of NPDES Permit on Folsom's SSS Conveyances, and need for proper infrastructure PRIOR to "piecemeal" or "backbone" sketchy plans. South of 50 is so barren AKT said: "it's so dry the jackrabbits carry in their lunch."

**PROPOSED FOLSOM CORPORATION YARD SPHERE OF INFLUENCE
AMENDMENT AND ANNEXATION (LAFCo #01-17)**

Please provide your input on what environmental effects and issue areas should be considered in the environmental review of the sphere of influence/annexation proposal. We appreciate your comments.

Lawrence - would like to see
engineer - approved water plans
showing a non American ^{River} water
source for the South of 50 area,
including this project

Show that this would not ^{negatively} affect
areas North of 50

Disclaimer: Before including your address, e-mail address or other personal identifying information on this comment sheet, please be aware that information on this comment sheet will be added to the environmental impact report record and may be made publicly available. While you can request that your personal identifying information be withheld from public review, LAFCo and the City of Folsom cannot guarantee that this will be possible.

From: LJ Laurent [<mailto:ljl Laurent@att.net>]
Sent: Friday, December 08, 2017 9:38 AM
To: Alex@Waterboards MacDonald
Cc: Lockhart. Don; victor.vasquez@waterboards.ca.gov
Subject: Groundwater contamination E. Sac County

To: Alex Macdonald, Waterboards
From: Lurette Laurent
Dec. 8, 2017

Re: Public Notice Map

Alex, printed map 2"x4" is hard to read.

Folsom asked Sac LAFCO for permission to annex 60 Aerojet acres south of WHITE ROCK Rd. for the expressed purpose of Folsom Corporation Yard. City wants to buy this third corp yard site from Aerojet. City bought a south of 50 parcel -- a Superfund Site -- for a corp yard, but now city wants to hand over more money to Aerojet.

The public hearing was held by one city junior planner and a gaggle of Aerojet owners reps. They were quite rude to the 3 attendees -- all 3 from Lake Natoma Shores Subdivision (& SARA members).

I cannot tell from your map if these south of White Rock Rd acres have contamination, according to studies.

LAFCO is co-agency on SOIA/annexation of land south of White Rock. I do not see why the city needs a 2nd contaminated Aerojet site for a corp yard down there. As usual, Folsom will not provide CA Licensed engineers Certified studies. This is a problem.

Also, FYI, Waterboards Water Rights Division sent city a May 11, 2017, demand letter for proof of "Non-American River water supply" for all south of 50 city. City responded with reams of legalese, but no evidence of certified Measure W-compliant water supply.

If you have a site where I can enlarge the contamination maps, it would help. Thank you.

Laurie

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



November 30, 2017

Don Lockhart
Sacramento County Local Agency Formation Commission
1112 I Street #100
Sacramento, CA 95814

RE: SCH#2017112020, Folsom Corporation Yard Sphere of Influence, Sacramento County

Dear Mr. Lockhart:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.

- b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
 3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
 4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).
 7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources

Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. **Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. **Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. **Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at:
<http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions, please contact me at my email address: sharaya.souza@nahc.ca.gov.

Sincerely,



Sharaya Souza
Staff Services Analyst
(916) 573-0168

cc: State Clearinghouse



December 1, 2017

Main Office

10060 Goethe Road
Sacramento, CA 95827-3553
Tel: 916.876.6000
Fax: 916.876.6160

Treatment Plant

8521 Laguna Station Road
Elk Grove, CA 95758-9550
Tel: 916.875.9000
Fax: 916.875.9068

Board of Directors

Representing:

County of Sacramento

County of Yolo

City of Citrus Heights

City of Elk Grove

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City of Rancho Cordova

City of Sacramento

City of West Sacramento

Prabhakar Somavarapu

District Engineer

Ruben Robles

Director of Operations

Christoph Dobson

Director of Policy & Planning

David O'Toole

Director of Internal Services

Joseph Maestretti

Chief Financial Officer

Claudia Goss

Public Affairs Manager

www.regionalsan.com

Don Lockhart

Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

Subject: Sacramento Local Agency Formation Commission/City of Folsom Notice of Preparation of an Environmental Impact Report for the Folsom Corporation Yard Sphere of Influence Amendment and Annexation (L AFC #01-17)

Dear Mr. Lockhart:

Sacramento Regional County Sanitation District (Regional San) has the following comments regarding the Sphere of Influence amendment for the Folsom Corporation Yard:

The City of Folsom will provide local sewer service for the proposed project area. Regional San provides conveyance from local trunk sewers to the Sacramento Regional Wastewater Treatment Plant (SRWTP) through large pipelines called interceptors.

The proposed project area is located outside of the Sacramento County Urban Services Boundary. In order to receive sewer service from Regional San, the project proponent must annex into the Regional San service area.

Regional San is not a land-use authority. Regional San designs sewer systems using predicted wastewater flows that are dependent on land use information provided by each land use authority. Regional San bases the projects identified within their planning documents on growth projections provided by land-use authorities. Onsite and offsite environmental impacts associated with extending sewer services to this development should be contemplated in this environmental document.

Customers receiving service from Regional are responsible for rates and fees outlined within the latest Regional San ordinance. Fees for connecting to the sewer system recover the capital investment of sewer and treatment facilities that serves new customers. The Regional San ordinance is located on their website at <http://www.regionalsan.com/ordinance>.

Regional San has the means and capacity to provide sanitary sewer conveyance and wastewater treatment with no negative impacts to existing customers. The project proponents should work closely with Regional San Development Services to ensure proper connection to the Folsom East Interceptor.

If you have any questions regarding these comments, please contact me at 916-876-9994

Sincerely,

Sarena Moore

Sarena Moore
Regional San/SASD
Policy and Planning

Cc: Regional San Development Services, SASD Development Services, Michael Meyer, Dave Ocenosak, Christoph Dobson



County of Sacramento

December 5, 2017

Mr. Don Lockhart
Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814-2836
E-mail: Don.Lockhart@SacLAFCo.org



SUBJECT: COMMENTS ON THE NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE FOLSOM CORPORATION YARD SPHERE OF INFLUENCE AMENDMENT AND ANNEXATION (LAFC #01-17)

Dear Mr. Lockhart:

We have received the notice of preparation of an environmental impact report and notice of public scoping meeting for the proposed Folsom Corporation Yard Sphere of Influence Amendment and Annexation and Prezone, dated November 8, 2017. We appreciate the opportunity to review and comment on this subject project. Based on the notice received, we have the following comments to offer at this time.

1. The limits of the sphere of influence should not include the easterly most extension to the existing roadway alignment of Scott Road. Instead, please include a proposed roadway easement for the future realignment of Scott Road, similar to the proposed access easement for future access to Prairie City OHV Park.
2. The Sacramento County General Plan designates Scott Road between White Rock Road and Latrobe Road as a Scenic Corridor. The environmental document should consider how the proposed action will affect the scenic and aesthetic values of this road and suggest measures to protect such values. General Plan policies CI-51 through CI-64 should be considered.
3. Alternative locations for a corporation yard that don't affect this scenic roadway should be considered in the environmental document.
4. The proposed corporation yard uses include activities associated with large and heavy vehicles. Scott Road south of the proposed corporation yard should not be utilized by these vehicles which should be routed to White Rock Road instead.
5. The roadway alignment for the extension of Prairie City Road south of White Rock Road to its intersection with the realigned segment of Scott Road is currently proposed as a T-intersection with the through movement being Scott Road to the OHV park access. This roadway alignment should be revised so that the through movement is Prairie City Road to Scott Road with the OHV park access connecting as a "T" intersection. Horizontal

roadway curves on Scott Road should not be greater than an 800-foot radius so as to not encourage excessive speeds.

6. How will the realignment of Scott Road and the subsequent abandonment of the northerly segment of Scott Road affect access to the parcels both east and west of the abandoned Scott Road segment? Note that the Capital SouthEast Connector roadway on this portion of White Rock Road is intended to be access controlled (access will be prohibited from White Rock Road).
7. Please coordinate the traffic study with County staff for review and comments. We will provide feedback relating to the trip generation estimate, traffic assignment and trip distribution, assumed lane configurations, traffic signal phasing, frontage improvements, and future land use assumptions along with future roadway network. The county has approved various projects in this vicinity and they should be considered in the cumulative impact analysis. Some of these approved projects include Easton Place and Glenborough, Cordova Hills, three mining projects in the east portion of the County, Florin Vineyard Community Plan, North Vineyard Station Specific Plan, and the Southeast Connector JPA phase 1 improvement. Some of the foreseeable projects that are currently going through the environmental analysis are West Jackson Master Plan, Jackson Township Specific Plan, New Bridge Specific Plan, Mather South Specific Plan, and Rancho Murieta North Residential development. Selection of the study intersections and roadway segments should be based on review of the travel demand model assignment from this traffic analysis zone.

If you have any questions, please feel free to contact me at (916) 875-2844.

Sincerely,

[Sent via email]

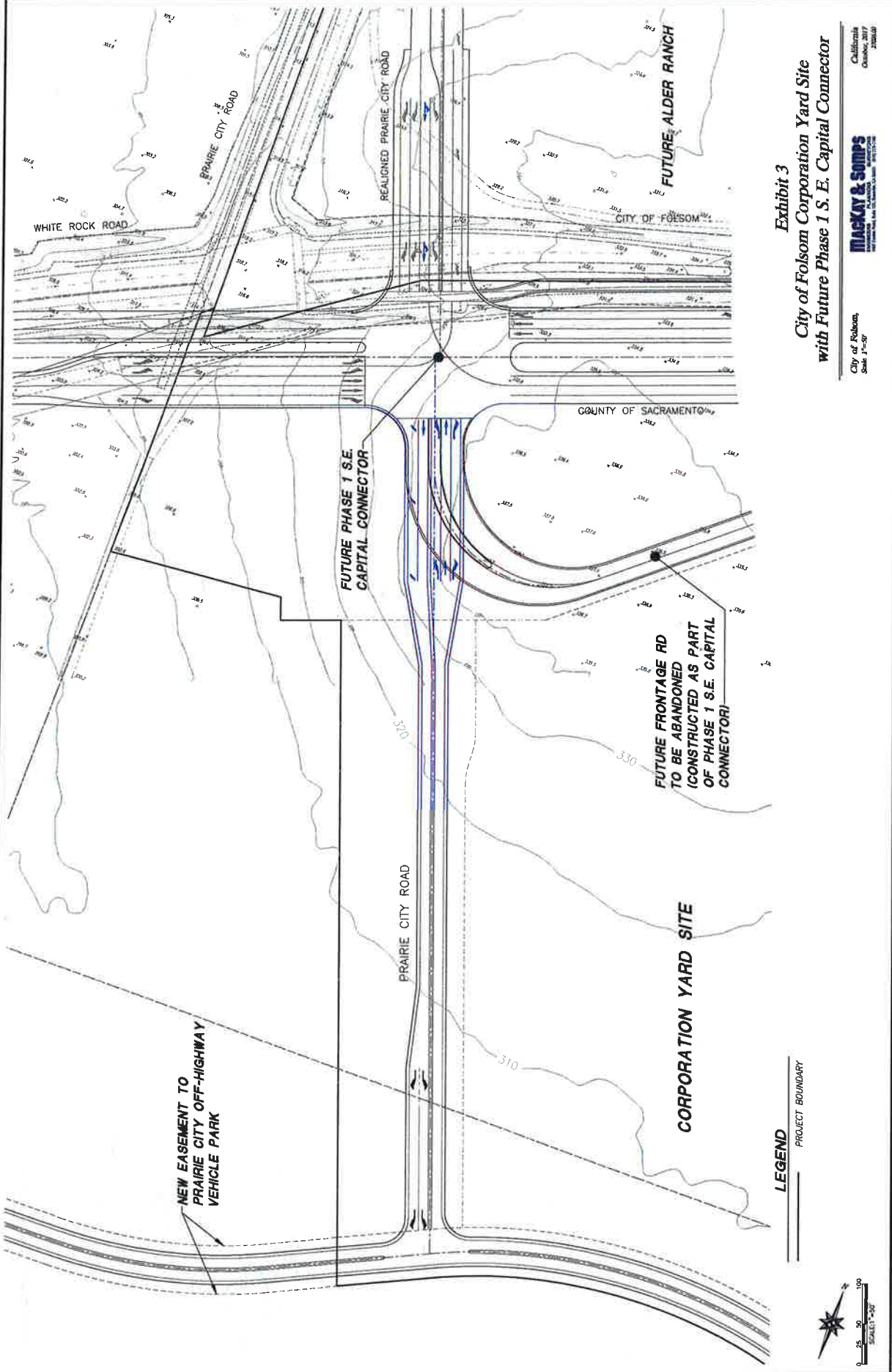
Kamal Atwal, P.E.
Associate Transportation Engineer
Department of Transportation

KA

Enclosure or Attachments:
Scott Road Realignment Exhibits 1-5.pdf

Cc: Matt Darrow, DOT
Dean Blank, DOT
Dan Shoeman, DOT
Ron Vicari, DOT
Marianne Biner, Office of Planning and Environmental Review
Jeff King, Chief Financial Office

THIS DOCUMENT IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE BY A CONTROLLING AGENCY OR BY AN EXECUTIVE ORDER TO DECLASSIFY AND DATE



LEGEND

PROJECT BOUNDARY

Exhibit 3

**City of Folsom Corporation Yard Site
with Future Phase 1 S. E. Capital Connector**

City of Folsom,
Scale 1"=20'

MACKAY & SOMPS
REGISTERED PROFESSIONAL ENGINEERS
1000 S. G ST. SUITE 100
FOLSOM, CA 95630

California
October, 2017
2017010

17/10/2017 10:30 AM... (Small text at the bottom edge of the page)



Sent Via E-Mail

December 7, 2017

Mr. Don Lockhart, AICP, Executive Officer
Sacramento Local Agency Formation Commission
1112 I Street, Suite 100 Sacramento, CA 95814-2836
Don.Lockhart@SacLAFCo.org



Subject: Notice of Preparation of an Environmental Impact Report for the Folsom Corporation Yard Sphere of Influence Amendment and Annexation (LAFC #01-17)

Dear Mr. Lockhart:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for the Folsom Corporation Yard Sphere of Influence Amendment and Annexation (Project, SCH #2017112020 / LAFC #01-17). SMUD is the primary energy provider for Sacramento County and the proposed Project area and has facilities within the Project area including two 230kV transmission lines on a single set of towers, distribution lines, poles, and easements. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

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

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
 - <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
 - <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery

Based on our review of the NOP and our understanding of the proposed Project, SMUD offers the following input for your consideration:

1. Project Description: SMUD would like to be informed of any anticipated Project related impacts on existing or future SMUD facilities. It is important that the information regarding the potential impacts to SMUD facilities in the vicinity of the proposed Project be contained in the project description chapter of the NOP, as well as the existing conditions discussion of the utilities, hazards and hazardous materials, and cumulative impact sections.
2. Planning and CEQA Considerations: As a Responsible Agency, SMUD requests that any conflicts related to SMUD facilities, potential impacts from new or relocated facilities, and any potential issues related to our facilities or easements be considered during the project design and planning and any associated impacts be considered in the NOP.

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

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this NOP. If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Ammon Rice, at ammon.rice@smud.org or 916.732.7466.

Sincerely,



Jamie Cutlip
Regional & Local Government Affairs
Sacramento Municipal Utility District
6301 S Street, Mail Stop A313
Sacramento, CA 95817
jamie.cutlip@smud.org

Cc: Ammon Rice

(JC/sc)



DEPARTMENT OF PARKS AND RECREATION

Lisa Ann L. Mangat, Director

RECEIVED

NOV 29 2017

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

November 21, 2017

Sacramento Local Agency Formation Commission
City of Folsom Corporation Yard Sphere of Influence and Annexation (LAFC #01-17)
Notice of Preparation of an Environmental Impact Report
Mr. Don Lockhart, AICP, Executive Officer
1112 I Street, Suite 100
Sacramento, CA 95814-2836

Dear Mr. Lockhart,

Thank you for the opportunity to comment on the City of Folsom Corporation Yard Sphere of Influence and Annexation Notice of Preparation of an Environmental Impact Report.

Prairie City State Vehicular Recreation Area (SVRA) is an over 1,300 acre park operated by the California Department of Parks and Recreation (DPR) for off-highway vehicle (OHV) recreation. Prairie City SVRA has been operated by DPR since 1988 and offers many miles of trails, tracks, and obstacle courses for all types of OHVs. Prairie City SVRA is a favorite destination for many families who enjoy the diversity of recreation opportunities and amenities that the park offers to the public.

Prairie City SVRA directly borders the proposed project site, and there is the possibility that there will be line of site to some of the trails and tracks at the park. The Northeast portion of Prairie City which borders the proposed project site has been identified in the SVRA General Plan as a Vernal Pool Management Area due to the areas high concentration of vernal pools. This area has been identified for non-motorized recreation uses including but not limited to picnicking, wildlife viewing, and guided vernal pool interpretive hikes.

As you are most likely aware, sound and dust can be byproducts of OHV recreation and it is important that the City of Folsom and its employees are made aware of Prairie City SVRAs presence, current operation, and the potential for these byproducts at the project site.

I would like to be kept up to date on the progress of this project as you move forward.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Jeanne Sisson
California State Parks
Prairie City SVRA Sector Superintendent
Jeanne.Sisson@parks.ca.gov
916-985-1097

cc.

Brian Robertson, Off-Highway Motor Vehicle Recreation (OHMVR) Division Chief