

APPENDIX M

COMMENTS ON THE DRAFT EIR



KRONICK
MOSKOVITZ
TIEDEMANN
& GIRARD

August 5, 2024

VIA E-MAIL AND U.S. MAIL

Sacramento County, Department of Community Development
Planning and Environmental Review Division
Attention: Environmental Coordinator
827 7th Street, Room 225
Sacramento, CA 95814
Email: CEQA@saccounty.net

Re: West Jackson Highway Master Plan
(State Clearinghouse No 2013092021, County Control Number PLNP2008-00240)

Dear Sir or Madam:

I am writing on behalf of the Amador County Transportation Commission ("ACTC") and in response to the West Jackson Highway Master Plan (State Clearinghouse No 2013092021, County Control Number PLNP2008-00240) (the "Project").

The Project is located along State Route 16 (SR-16 or Jackson Highway) in generally the geographic center of Sacramento County. ACTC has previously commented on other development projects that abut SR-16 on circulation, VMT, and related traffic grounds.

ACTC submits this comment letter and incorporates by reference its previous comment letters as they pertain to this Project. Unless this project includes the reservation of the 14 foot right-of-way as part of the design and description of the Project and within the MMRP, ACTC has no assurance that traffic will be mitigated without an enforceable implementation measure.

ACTC remains unopposed to the approval of any development project within Sacramento County, inclusive of this one. However, ACTC is opposed to development projects that are approved without adequate identification, analysis, and mitigation of anticipated environmental impacts as required by law, especially those impacts to traffic, circulation, and vehicle miles travelled.

Re: State Clearinghouse No. 2013092021
August 5, 2024
Page 2

Sincerely,

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation



MONA G. EBRAHIMI

MGE/las



**Department of Water
Resources**
Matt Satow
Director



Divisions
Water Supply
Drainage
Administrative Services/Finance

County of Sacramento

Date: 08/27/2024

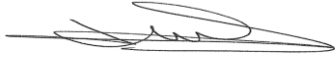
To: Environmental Coordinator
County PER

Subject: Draft Environmental Impact Report dated July 2024 – County DWR Drainage Comments

County DWR has reviewed the subject document and has the following comments:

1. Table ES-4.
 - a. Page ES-51: The following documents should be listed in addition to the 2018 SWQ Manual and HMP: Sacramento County Drainage Study Requirements, Sacramento County Hydrology Standards, and Section 9 of the Sacramento County Improvement Standards.
 - b. Page ES-53: The mitigation measure for impact HYD-6 suggests that the County may develop a “regional solution for flooding related to climate-change.” What County agency/department is expected to lead this effort?
 - c. ES-54: Metering outflows does not mitigate for added runoff volume as suggested in the document.
2. Hydrology, Drainage, and Water Quality assessment for the No Project Alternative on page 3-12: It should be noted that the No Project Alternative would not construct housing within former mining pits and behind levees.
3. Local regulations on page 14-19: The County Code Safety Element policy discouraging development behind levees should be listed.
4. Impact HYD-3 on page 14-30, second paragraph, third sentence: The text suggests that a single duty pump will provide 200-year level of flood protection. 200-year level of flood protection is achieved via accredited levees and pump stations with several duty pumps. Please point to the portion of Appendix H that states that a single pump will provide 200-year level of protection.
5. Impact HYD-4 on page 14-34: It should be mentioned that some of the proposed areas for development will not only be behind levees but also lower than the bottom of Morrison Creek, as shown on the conceptual grading plan dated November 2022. If the levees were to fail during a large storm event, these areas could be inundated and the water could stay for prolonged periods since the creek would be higher than the developed area.
6. Impact HYD-6.
 - a. first paragraph on page 14-42: The climate change scaling factors used for the drainage master plan are applied to resulting flows rather than to the rainfall. The statement “scaling factors were used to adjust the precipitation-depth factors of the modeling” is inaccurate.
 - b. Second paragraph on page 14-42:
 - i. The statement “Under the scenario that uses the flow rate predictions for Arcade Creek, modeling demonstrates that the climate change flow would not exceed 1.0 cubic feet per second in the channels or detention basins within the plan area” appears to be incorrect. Please point to the portion of Appendix H that supports this statement.
 - ii. Mitigation Measures on page 14-42: Higher and wider levees should be listed as potential infrastructure changes to provide climate change resilience.

Please feel free to call if you have any questions.



J. Luis Rodriguez, P.E., M.S., C.F.M.

Associate Civil Engineer

Sacramento County Department of Water Resources

Drainage Development and Floodplain Management

Phone: (916) 874-7172

CC:

Michael Durkee, P.E.

Amittoj Thandi, P.E.

County DWR



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

September 4, 2024

Julie Newton
Environmental Coordinator
Sacramento County
827 7th Street, Room 225
Sacramento, CA 95814
newtonj@saccounty.gov

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WEST JACKSON
HIGHWAY MASTER PLAN DATED JULY 25, 2024, STATE CLEARINGHOUSE
NUMBER [2013092021](#)

Dear Julie Newton,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the West Jackson Highway Master Plan (Project). The proposed Project will create two District Plan Areas (District 1 and District 2) (approximately 5,913 acres) and three Future Planning Areas (FPA). The Project will require amendments to the Sacramento County General Plan and the Cordova and Vineyard Community Plans. The Project includes a rezone to Special Planning Area for District 1 and District 2. Within Districts 1 and 2, the Project includes a range of land uses: very low density residential (1-4 units/acre), low density residential (3-8 units/acre), medium density residential (7-18 units/acre), high density residential (20-30 units/acre), mixed use (20-30 units/acre), commercial, employment, industrial, parks/open space, schools (three elementary schools and one middle/high school),

institutional and major roadways. The proposed Project will include future Specific Plans which may include rezoning and future developments.

As stated in the DEIR, the proposed project has development plans immediately south of the former [Mather Air Force Base \(AFB\)](#) which is listed on the Superfund National Priorities List (NPL) site. DTSC recommends that the following comments be addressed in the Final EIR:

1. Groundwater - Chlorinated solvents and Per- and Polyfluoroalkyl Substances (PFAS) contaminant plumes from the former Mather AFB impact groundwater within project plan area. Any new private or public drinking water well application would be subject to Sacramento County ordinance regarding groundwater consultation zone and would require both Local and State agency approval. Please review the [Annual and Fourth Quarter 2021 Groundwater Monitoring Report](#) and enclosed PFAS figure for specific information regarding contaminant plumes and groundwater remedial systems (monitoring wells, extraction wells and piping system) south of the former Mather AFB. The Air Force and Regulatory Agencies (Environmental Protection Agency, DTSC and Central Valley Water Board) would require the protection of the groundwater remedial system during property development.
2. Site 7 Groundwater Plume - The chlorinated solvent groundwater plume is fairly shallow. Evaluation of shallow soil gas and potential vapor intrusion mitigation is warranted prior to building construction for commercial/industrial and residential use. Please review the above report regarding the Site 7 groundwater plume.
3. Waste Pit 07 (WP-07, also known as the Site 7 landfill) - The WP-07 description and location (along the southern former Mather AFB boundary) is in the [Mather 2022 Fourth Quarter and Annual Landfill Inspection and Gas Monitoring Report](#). The WP-07 Land Use Controls (LUCs) or Institutional Controls (ICs) associated with properties on the former Mather AFB (owned by Sacramento County) are in the [Revised Final ESD from Soil Operable Unit \(OU\) and Groundwater OU Plume ROD](#) and state the following:

“Controls to minimize potential for completing the inhalation exposure pathway for methane and other gasses potentially migrating from the landfill sites, require future landowners to obtain approval for any changes in land use or site improvements within 1,000 feet of a landfill from the State, until and unless it is demonstrated that the landfill is no longer a threat to human health and the environment. This requirement is based on regulations at 27 California Code of Regulations (CCR) § 21190 that apply to landfill properties.”

4. The Air Force and Regulatory Agencies should be consulted regarding establishment of an appropriate buffer zone based upon WP-07 (and/or item 2) soil gas data and land use to limit construction in the vicinity of the landfill site south of the Mather AFB boundary, if warranted.
5. The PFAS remedial investigation has not started and will not be completed until late 2025. Please refer to the [Mather Fifth Five Year Review Report \(Cape 2020\)](#) for additional references.
6. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).
7. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing

materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's PEA Guidance Manual](#).

8. When agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [HHRA NOTE NUMBER 3, DTSC-SLs](#) approved thresholds. If they are not, remedial action must take place to mitigate them below those thresholds.
9. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required.


DTSC believes Sacramento County must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA.

Please refer to the [Sacramento County EnviroStor Map](#) for additional information about the areas of potential contamination. If further concerns or impacts surface in light of any forthcoming environmental documents or any future Projects within the proposed Project area, DTSC reserves the right to provide applicable comments at that time.

Julie Newton
September 4, 2024
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DTSC appreciates the opportunity to comment on the DEIR for the West Jackson Highway Master Plan. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

A handwritten signature in cursive script that reads "Tamara Purvis".

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

Julie Newton
September 4, 2024
Page 6

cc: (via email)

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State.Clearinghouse@opr.ca.gov

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Amber Ginorio
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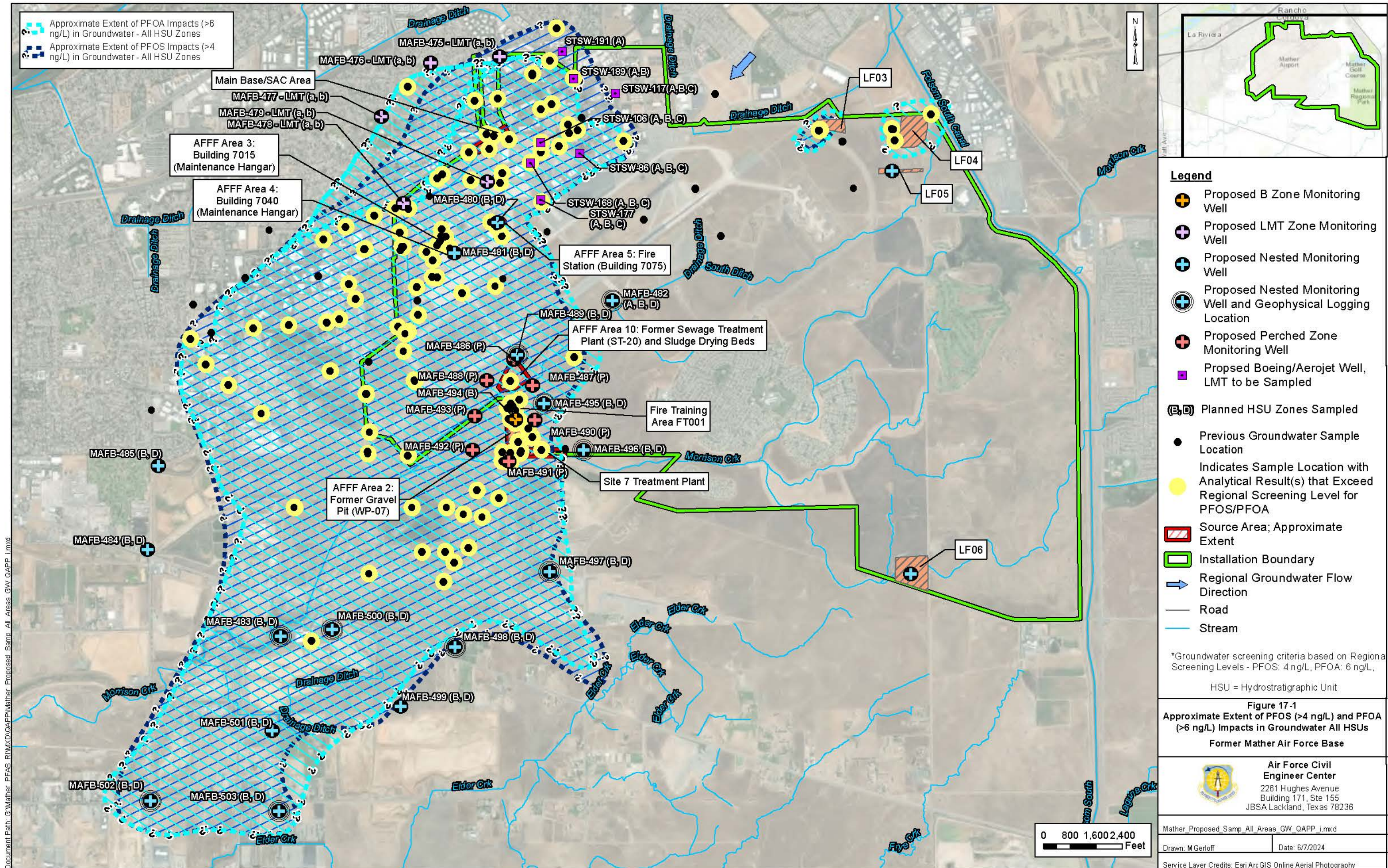
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Julie Newton
September 4, 2024
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Scott Wiley
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Scott.Wiley@dtsc.ca.gov





September 3, 2024

SENT VIA EMAIL

Sacramento County
Department of Community Development, Planning and Environmental Review Division
Attention: Environmental Coordinator
827 7th Street, Room 225
Sacramento, CA 95814

SUBJECT: West Jackson Highway Master Plan (State Clearinghouse No 2013092021, County Control Number PLNP2008-00240)

Mrs. Newton,

Thank you for contacting Sacramento Local Agency Formation Commission (LAFCo) regarding the West Jackson Highway Master Plan (WJHMP) Draft Environmental Impact Report (DEIR). The WJHMP is a new master plan for approximately 5,913 acres and this Plan establishes a framework for the development of the Plan Area that include proposed land use designations, policies to guide development and ongoing operations, and plans for infrastructure and public services.

LAFCo goals include ensuring orderly formation of local governmental agencies within Sacramento County for efficient extension and provision of public services. This is supported by Government Code §56001 that states, "a single multipurpose governmental agency is accountable for community service needs and financial resources and, therefore, may be the best mechanism for establishing community service priorities especially in urban areas." The development of WJHMP would be considered an urban area.

As such, LAFCo has reviewed the DEIR for this project, and would like to provide the following comments:

- **Park Districts:** As mentioned on page 2-33 of the DEIR, the WJHMP area is within two park districts: Cordova Recreation and Park and Southgate Recreation and Park. For a project of this size that results in the development of 5,913 acres that will provide for 16,484 residential dwelling units, dividing the area into two

Commissioners

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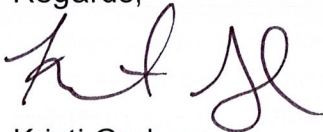
separate park districts would not be consistent with the Government Code §56001 and LAFCo's goal to ensure the orderly formation of local governmental agencies.

As part of this entitlement application, a resolution consistent with Government Code §56668.3 will need to be approved to initiate a change or reorganization of the park districts. For example, the resolution could be for a reorganization for the detachment from a park district and annexation into another park district, which will include a Municipal Service Review since both park districts have a coterminous Sphere of Influence (SOI) and will need to be amended.

- **Water Districts:** As mentioned on page 2-37 of the DEIR, the WJHMP area is within two water districts: Sacramento County Water Agency and California American Water Company. Similar to the comment above, this project is too large to be considered consistent with Government Code §56001 and will need be part of one water district. However, both agencies are not within LAFCo's jurisdiction.
- **Wastewater:** On Page 2-31, it states that the WJHMP is within the service area of Sacramento Area Sewer District (SacSewer) and that is not correct. The project area is located within the SOI for SacSewer and will need to be annexed into the service area per Government Code §56668.3.

If you have any questions regarding the comments above, please do not hesitate to reach out to our office. Thank you again for including LAFCo in this process.

Regards,



Kristi Grabow
Policy Analyst

**Department of Environmental
Management**

Jennea Monasterio
Director

Divisions

Administration
Environmental Compliance
Environmental Health

County of Sacramento

September 3, 2024

TO: Julie Newton (newtonj@saccounty.gov)
FROM: Leana Nguyen (nguyenl@saccounty.gov)
SUBJECT: PLNP2008-00240 West Jackson Highway Master Plan

LOCATION: *The proposed Project is located along State Route 16 (Jackson Highway) in generally the geographic center of Sacramento County. The Project boundaries are generally Jackson Highway, Kiefer Boulevard and Goethe Road to the north, portions of Elder Creek Road and Florin Road to the south, the City of Sacramento to the west and Excelsior Road to the east.*

EMD PROJECT COMMENTS:

1. Prior to final occupancy, each lot that is newly developed as part of the West Jackson Highway Master Plan must connect to public water.
2. Prior to final occupancy, each lot that is newly developed as part of the West Jackson Highway Master Plan must connect to public sewer.
3. Prior to recordation of the final map, if an abandoned well is found on the property, it must be issued an inactivation permit (subject to review and approval from EMD), repaired and brought back into service, or it must be destroyed at the parcel owner's cost. EMD will provide a spreadsheet of all abandoned well records located within the project location. All well-related activities must be performed in compliance with EMD's well permitting and inspection program requirements. Contact wells@saccounty.gov with any questions.
4. Prior to recordation of the final map, if an abandoned septic system tank is discovered on the property, it must be destroyed in compliance with EMD's liquid waste permitting and inspection program requirements. EMD will provide a spreadsheet of all existing septic systems located within the project location. When these septic systems are no longer in use, the septic tanks must be abandoned under a permit issued by EMD. Contact septicinfo@saccounty.gov with any questions.

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September 5, 2024

County of Sacramento Department of Community Development -
Planning and Environmental Review Division
827 7th Street, Room 225
Sacramento, CA 95814

**Subject: NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT
REPORT FOR THE WEST JACKSON HIGHWAY MASTER PLAN
PROJECT (SCH# 2013092021)**
Project No: PLNP2008-00240

Dear Environmental Coordinator,

The Sacramento Area Sewer District (SacSewer) has reviewed the subject document and has the following comments.

The proposed Project is located along State Route 16 (Jackson Highway). It is generally bounded by Jackson Highway, Kiefer Boulevard, and Goethe Road to the north, portions of Elder Creek Road and Florin Road to the south, the City of Sacramento to the west, and Excelsior Road to the east in the County of Sacramento.

The Project area consists of 484 parcels totaling approximately 5,913 acres. It will provide for 16,484 residential dwelling units, 988 acres of commercial, employment, and industrial land, 2,101 acres of parks and open space, and six elementary schools, one middle school, and one high school.

Large portions of the Project area are located outside the SacSewer service area. As such, SacSewer has not planned, designed, or constructed facilities to provide service to portions of the Project site. To receive sewer service, annexation into SacSewer's Collection service area and the SacSewer Treatment and Resource Recovery service area will be required. The Project applicant should work closely with the Sacramento Local Agency Formation Commission (<https://sacdafco.saccounty.net>) to begin the annexation process. Upon annexation, SacSewer will provide local sewer service for the Project area.

Note: Effective January 1, 2024, the Sacramento Regional County Sanitation District and the Sacramento Area Sewer District merged into one district called the Sacramento Area Sewer District, or SacSewer for short.

www.sacsewer.com

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West Jackson Highway Master Plan
SCH# 2013092021
PLNP2008-00240
September 5, 2024

SacSewer will provide local sewer service to the proposed project area via its collection system, which conveys sewage from the collection system to the EchoWater Resource Recovery Facility for treatment, resource recovery, and disposal.

SacSewer is not a land-use authority and plans and designs its sewer systems using information from land-use authorities. SacSewer bases the projects identified within its planning documents on growth projections provided by these land-use authorities.

To receive sewer service, the project proponent must complete Sewer Master Plans that include connection points and phasing information to assess the existing and buildout available capacity of the collection systems and determine if the current facilities can convey the additional flows generated by the Project.

SacSewer approved the West Jackson Highway Level 2 Sewer Study on June 14, 2017. Any changes to the proposed or assumed land use that could impact the sewer design presented in the study will require the study to be revised and resubmitted to SacSewer for review and approval.

This environmental impact report should contemplate the onsite and offsite environmental impacts associated with extending sewer service to the Project area.

In March 2021, the SacSewer Board of Directors approved the most current SacSewer planning document, the 2020 System Capacity Plan Update (SCP). In February 2013, the SacSewer Board of Directors adopted the Interceptor Sequencing Study (ISS). The SCP and ISS are on the SacSewer website at [System Capacity Plans - Sacramento Area Sewer District \(sacsewer.com\)](https://www.sacsewer.com/system-capacity-plans).

Customers receiving service from SacSewer are responsible for rates and fees outlined within the latest SacSewer ordinance. Fees for connecting to the sewer system recover the capital investment of sewer and treatment facilities that serve new customers. SacSewer does not guarantee sewer service or system capacity to the Project site until the proper permits are obtained to connect to the system and all facility impact (capacity) fees are paid. The SacSewer ordinances are on the SacSewer website at [Ordinances - Sacramento Area Sewer District \(sacsewer.com\)](https://www.sacsewer.com/ordinances).

If you have any questions regarding these comments, please call me at (916) 876-6104.

Sincerely,

Robb Armstrong

Robb Armstrong
Policy & Planning

Central Valley Regional Water Quality Control Board

6 September 2024

Julie Newton
Sacramento County
827 7th Street, Room 225
Sacramento, CA 95814
newtonj@saccounty.gov

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, WEST JACKSON HIGHWAY MASTER PLAN, SCH#2013092021, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 25 July 2024 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the West Jackson Highway Master Plan, 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 Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources 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/

The Central Valley Water Board partners with the Department of Toxic Substances Control (DTSC) and the USEPA to regulate the Former Mather Air Force Base (Mather). Central Valley Water Board is aware of an existing plume of per- and polyfluoroalkyl substances (PFAS) that are known to be present beneath a large portion of the planned development area. Several domestic and public supply wells exist beneath and nearby the planned development are known to have been impacted by the PFAS plume. Currently, Mather has begun the Remedial Investigation phase of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process to determine the lateral and vertical extent of the plume. Current preliminary estimates place the plume approximately 4.5 miles south-southwest of the former Mather Air Force Base property. The Central Valley Water Board requests to be informed of any plans to provide clean water to the planning area that will not negatively influence the known PFAS plume at Mather and avoid having further impact to future drinking water supplies. Please contact Amber Ginorio, P.G., of the Site Cleanup Program at (916) 464-4670 or by email at Amber.Ginorio@waterboards.ca.gov to discuss the proposed plan for supplying clean drinking water and address any concerns the Central Valley Water Board may have regarding impacts to the existing water quality issue in the planned development area.

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 Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.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 and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-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 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

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.

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

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 (USACE). If a Section 404 permit is required by the USACE, 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 USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE 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 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. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE 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. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging

activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

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 Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. 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 Threat 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 Threat Waiver and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

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 *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

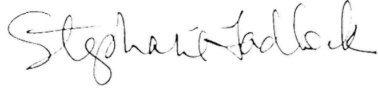
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface 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: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

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



Stephanie Tadlock
Senior Environmental Scientist (Supervisory)

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento
Mark Clardy, Central Valley Water Board, Mark.Clardy@waterboards.ca.gov
Amber Ginorio, P.G., Central Valley Water Board,
Amber.Ginorio@waterboards.ca.gov
Anne Walters, Central Valley Water Board. Anne.Walters@waterboards.ca.gov

California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 821-8401
www.dot.ca.gov



October 29, 2024

GTS# 03-SAC-2017-01861
SCH# 2013092021

Ms. Julie Newton
Environmental Coordinator
Sacramento County
Community Development Department
827 7th Street, Room 225
Sacramento, CA 95814

West Jackson Highway Master Plan

Dear Ms. Newton:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which includes addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The proposed Project is located along State Route (SR) 16/Jackson Highway in Sacramento County, California. The project boundaries are generally SR 16, Kiefer Boulevard and Goethe Road to the north, portions of Elder Creek Road and Florin Road to the south, the City of Sacramento to the west and Excelsior Road to the east. The West Jackson Highway Master Plan (WJHMP) establishes a framework and strategy for development of the Plan Area, including proposed land use designations, policies to guide development and ongoing operations, and plans for infrastructure and public services. The project site consists of 484 parcels totaling approximately 5,913 acres. The WJHMP provides for 16,484 residential dwelling units; 988 acres of commercial, employment and industrial land; 2,101 acres of parks and open space; and six elementary schools, one middle school, and one high school.

The Project will require amendments to the Sacramento County General Plan to include the proposed land uses, streets and bikeways on the General Plan's Land Use Diagram, Transportation Plan, and Active Transportation Plan and both the Cordova and Vineyard Community Plans. The Project will also require Sacramento County

Water Agency Board of Directors' approval of a Water Supply Master Plan amendment to the existing Zone 40 Water Supply Master Plan to include provision of water service to the WJHMP area, and the approval of two Water Supply Assessments pursuant to California Water Code. Based on the Draft Environmental Impact Report (DEIR) documents provided, Caltrans has the following requests and recommendations:

Freeway Operations/Traffic Safety

Caltrans Freeway Operations has reviewed the West Jackson Highway Local Transportation Analysis (LTA) which considers the following developments:

- West Jackson Highway Master Plan
- Jackson Township Specific Plan
- Newbridge Specific Plan
- Mather South Community Master Plan

The requested Queue Analysis of the US 50 freeway offramps provided on 10/18/24, has been reviewed. Caltrans will determine/consider a list of potential mitigation projects to potentially receive Fair Share contribution as per the agreements and calculated amounts determined. We recommend providing a general comment regarding the topic of Fair Share contribution to one or more of the projects we identify on the SHS.

Forecasting & Modeling

Regarding the implementation of the VMT mitigation measures outlined in the DEIR, particularly the employee VMT mitigation measures, it is not clear how measures will be monitored throughout the project's phases and after its completion. Please provide clarification on how VMT mitigation will be monitored, and its effectiveness reported. In addition, there is a damping effect in which the joint impact of the VMT mitigation measures is not additive. For instance, the VMT reduction due to two measures combined may not necessarily be equivalent to the sum of the number of vehicle-miles reduced due to each measure.

Hydraulics

The West Jackson Highway Master Plan would significantly alter the existing drainage pattern on SR 16. Please show how net increase from a 100-year storm event peak discharge will be managed within the State's highway right of way (ROW) and/or Caltrans drainage facilities.

- The developer must maintain or improve existing drainage patterns and/or facilities affected by the proposed project to the satisfaction of the State and Caltrans. Please show how this project will accomplish that.
- The developer must properly maintain any drainage structure installed in the state's ROW.
- The developer may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or sustained.

Right of Way

Any future development that would require direct connection to our state route will require plans sets outlining our state ROW. For future planning and ROW record maps please contact District 3 ROW Front Map Counter by contacting:
d3rwmaprequest@dot.ca.gov.

Encroachment Permit

Any project or work, including access modification and drainage work, that takes place along or within the State's ROW requires an encroachment permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to Encroachment Permits Offices as indicated below:

Hikmat Bsaibess
California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901

D3encpermit@dot.ca.gov

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

Ms. Julie Newton, Environmental Coordinator
October 29, 2024
Page 4

If you have any questions regarding these comments or require additional information, please contact Satwinder Dhatt, Local Development Review Coordinator, by phone (530) 821-8261 or via email at satwinder.dhatt@dot.ca.gov.

Sincerely,



GARY ARNOLD, Branch Chief
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3

From: [Newton, Julie](#)
To: [Newton, Julie](#)
Subject: FW: West Jackson Highway Master Plan -- Draft Environmental Impact Report
Date: Monday, September 9, 2024 9:26:28 AM

From: roxanne fuentez <rmfz48@gmail.com>
Sent: Monday, September 9, 2024 6:59 AM
To: PER-CEQA <CEQA@sacounty.gov>
Subject: West Jackson Highway Master Plan -- Draft Environmental Impact Report

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If you have concerns about this email, please report it via the Phish Alert button.

Concerning the West Jackson Highway Master Plan, this undeveloped land is most of the last open space in Eastern Sacramento County not slated for development. I am opposed to this Project.

Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance will be lost if this Project goes forward. Permanent agricultural land will be lost to future generations.

Under the No-Project Alternative there would be continued operation of agriculture and rural residential uses. The grasslands, agricultural habitat, and trees would be retained in the Southeastern portion of the Plan Area that support Special-status plant and wildlife species known to occur in the Area.

The Golden Eagle has been documented in the Plan Area. The Giant Garter Snake, which is a Threatened Species, occurs in the Plan Area. The Tricolored Blackbird- an Endangered Species- has been recorded in the Plan Area. This species has declined 41% since 2011. They usually nest in cattails and tule marshes, but with the decline of these habitats, they are nesting in thickets of Willow, Himalayan Blackberries, Grain fields, and tall herbs, such as Stinging Nettles. The Tricolored Blackbird nests in Himalayan Blackberry stands and several other locations in the Plan Area.

The White-tailed Kite is a California Department of Fish and Wildlife Fully Protected Species. It hovers before diving onto its target. It nests in the Plan Area, and has been observed in Plan Areas Aspen VIII and Aspen IX.

The Swainson's Hawk- a Threatened Species- has been observed nesting in the Plan Area.

The Burrowing Owl- which is in decline due to habitat destruction- occurs in the Plan Area. Open areas, annual grasslands, cropland, and restored agricultural land provide nesting and foraging habitat for the Burrowing Owl.

The Ferruginous Hawk, which is listed as a Special Animal by the California Department of Fish and Wildlife, has been recorded in the Plan Area.

The American Badger, a Species of Special Concern, lives in the Plan Area. Grasslands, croplands, and restored agricultural lands provide suitable habitat for the American Badger.

Viable habitat exists in the Plan Area for the Merlin- a California Department of Fish and Wildlife Special Animal- as well as the Hoary Bat, Song Sparrow, Purple Martin,

Bank Swallow, Black-crowned Night Heron, Double-crested Cormorant, Cooper's Hawk, Least Bell's Vireo, Yellow-headed Blackbird, Great Egret, and Great Blue Heron.

The Western Pond Turtle, a Species of Special Concern, occurs in the Plan Area at Morrison Creek, and in ponds, channels, and ditches.

The Western Spadefoot Toad is a California Species of Special Concern. Seasonal Wetlands, Vernal Pools, and Seasonal Wetland Swales all provide habitat for the Western Spadefoot Toad.

Threatened Vernal Pool Fairy Shrimp, Endangered Vernal Pool Tadpole Shrimp, Midvalley Fairy Shrimp, Linderiella- all occur in Vernal Pools in the Plan Area.

Vernal Pool Andrenid Bees, Blennosperma Andrenid Bees- Extremely Imperiled ground nesting bees- are found near and likely in the Plan Area.

The Hairy Water Flea is Critically Imperiled and has been documented at Mather Airport which overlaps the Plan Area.

Ricksecker's Water Scavenger Beetle, which is Rare and Imperiled, has been observed at Mather Airport, which overlaps the Plan Area.

Sanford's Arrowhead is a Rare Plant Species documented within the Survey Area.

Legenere is a Special Status Plant found at Mather (overlaps Plan Area) and likely occurs in the Plan Area. It is associated with the bottoms of Vernal Pools. Bogg's

Lake Hedge-hyssop is an Endangered Plant in Vernal Pools and edges of lakes and ponds and occurs at Mather Field (which overlaps the Plan Area) and likely occurs in

Plan Area Wetlands. Other Sensitive Special Status Plants which have been documented in the vicinity of the Plan Area and are likely to occur in the Plan Area, are Dwarf Downingia, Ahart's Dwarf Rush, Pincushion Navarrettia, and Slender Orcutt Grass.

All of the aforementioned plant, bird, and animal species would be wiped out if the Plan is implemented. Plants, birds, and animals have the right to have places to live.

Most of the land is undeveloped grassland and agricultural land. Interspersed with grasslands are Vernal Pools, Seasonal Wetlands, Seasonal Wetland Swales, Marshes, Seasonal Riparian Wetlands, and Ponds. Valley Oak, Cottonwood, Black Willow, Arroyo Willow, Sandbar Willow, and Coyote Bush make up the tree and shrub layer. Five ponds South of Jackson Highway contain freshwater marshes with Cattails and Bulrushes. These ponds help water several irrigated pastures. Croplands are utilized yearly and planted in crops such as wheat and hay. Irrigated pastures provide forage for cattle. If all of the proposed development is allowed, this farmland would be lost.

Regarding Mather Airport vs. development: Sacramento County's Airport Land Use Compatibility Plan and General Plan (Noise Element NO-3), prohibits residential development inside the Community Noise Equivalent Level (CNEL) 60 dB contour.

With a recent update to Mather Airport Theoretical Capacity Analysis- a proposed West Jackson Master Plan Alternative 1C Development would include residential properties within the CNEL 60 to 65 dB contour. It would be a mistake to allow residential development that close to the Airport and runways- especially near the ends of the runways. (Remember the Farrell's Ice Cream Parlor Tragedy at the Executive Airport.) Also, having housing development so close to the Airport may preclude staging air shows in the future.

On the parts of the Plan Site called Aspen VIII and Aspen IX (2 miles South of Mather

Field and one half mile East of Bradshaw Road), Teichert and Granite Companies want to expand mining operations. These are biologically sensitive areas and contain Vernal Pools, Seasonal Wetlands, Grasslands, Riparian Woodlands, Marshes, Ponds, and Streams. Many Endangered and Threatened plants, birds, and animals live in these areas.

Special Status Plants that occur in these areas are Sanford's Arrowhead, Slender Orcutt Grass, Sacramento Orcutt Grass, Legenere, Dwarf Downingia, Bogg's Lake Hedge-hyssop, Ahart's Dwarf Rush, Pincushion Navarettia, and Hogwallow Starfish (a plant), to name a few.

The Blennosperma Vernal Pool Andrenid Bee and the Andrenid Bee, the Threatened Vernal Pool Fairy Shrimp, the Endangered Vernal Pool Tadpole Shrimp, the Hairy Water Flea, the California Linderiella, the Ricksecker's Hydrochara -- all occur in the Plan Area (Aspen VIII and Aspen IX).

The Tricolored Blackbird (emergency listed as an Endangered Species) has one of the smallest ranges of any bird species in North America. They nest in the Plan Area (Aspen VIII and Aspen IX).

The White-tailed Kite, Northern Harrier, Swainson's Hawk, Ferruginous Hawk, Merlin, Burrowing Owl, Loggerhead Shrike, Yellow-billed Magpie, and Tricolored Magpie all occur in the Plan Area (Aspen VIII and IX).

The Western Spadefoot Toad, Western Pond Turtle, and American Badger occur in the Area.

On the Aspen VIII and IX site are 109 trees including Valley Oaks, California Black Walnuts, Fremont's Cottonwoods, and non-native trees, all of which provide habitat for birds and animals. Many of these are slated to be chopped down.

If the Plan goes forward, irrigation to pastures would cease and pastures would dry up, thus affecting all plants.

Impacts to Wetlands and other Waters by the implementation of the Plan are significant. The loss of suitable Western Spadefoot habitat and the deaths of these Toads is significant.

The Project would cause the permanent loss of Western Pond Turtle habitat and the deaths of individuals and eggs.

The Project would cause the loss of Vernal Pool habitat and Special Status Vernal Pool Invertebrates, including Vernal Pool Fairy Shrimp and Vernal Pool Tadpole Shrimp.

Nests of White-tailed Kites, Swainson's Hawks, and Northern Harriers would be destroyed by tree removal and the eggs and juveniles would be destroyed.

Red-tailed Hawks, Red-shouldered Hawks, American Kestrels, Great Horned Owls, and Barn Owls would be impacted by tree removal and earthmoving.

Nesting and roosting Burrowing Owls would be entombed and killed during vegetation removal and earthmoving.

White-tailed Kites' diet is 95% small rodents (especially California voles). Swainson's Hawks' diet is mostly rodents. The Project would impact 371.2 acres of foraging habitat, including 95.8 acres of annual grassland, 273 acres of irrigated pasture, and 24 acres of Seasonal Wetlands/Vernal Pools. This would cause the loss of suitable foraging habitat for these birds as well as habitat for many other species.

The loss of irrigated pasture/hay and non-irrigated annual grassland in the Plan Area would result in the loss of foraging habitat for the Merlin and the Ferruginous Hawk.

Nesting Loggerhead Shrikes would be impacted by the Project and eggs and

juveniles would be lost.

Nesting or roosting Yellow-billed Magpies would be impacted by the Project and eggs and juveniles would be lost.

The Extremely Endangered Tricolored Blackbird 's nests would be destroyed and eggs and juveniles would be lost by vegetation removal and earthmoving.

Permanent agricultural land would be lost to future generations if this Project is approved.

Widening Jackson Road to 6 lanes would encroach upon people's property and cause the loss of wetlands.

Under the No-project Alternative, there would be no loss of agricultural land, rural residential uses, and wildlife habitat.

Under the No-project Alternative, the visual aesthetics of the Area would be retained, and historic and tribal cultural resources would not be disturbed.

There would be less impact on transportation under the No-project Alternative, as well as less air, noise, and light pollution.

The No-project Alternative would not impact Mather Airport activities -- including Air Shows.

Sincerely, Roxanne Fuentez

CENTRAL VALLEY FLOOD PROTECTION BOARD

3310 El Camino Ave., Ste. 170
SACRAMENTO, CA 95821
(916) 574-0609



September 9, 2024

Julie Newton
Environmental Coordinator
Sacramento County
827 7th Street, Room 225
Sacramento, CA 95814
newtonj@saccounty.gov

Subject: Comments for the Draft Environmental Impact Report, West Jackson Highway Master Plan, SCH# 2013092021, Sacramento County

Dear Julie Newton,

The Central Valley Flood Protection Board (Board) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed West Jackson Highway Master Plan (proposed project).

The proposed project includes both Morrison Creek and Elder Creek within the proposed project area. Morrison Creek and Elder Creek are regulated streams within the Board's permitting authority, therefore an encroachment permit may be required for project activities within and adjacent to the streams.

Section 14 of the Draft EIR lists the regulatory setting for hydrology, drainage, and water quality of proposed project. Board staff recommend including information regarding an encroachment permit from the Board under the State heading. Board permit information is available on the [Permitting at the Central Valley Flood Protection Board website](#).

California Code of Regulations, Title 23 provides standards that govern the design and construction of projects that affect the flood control works and floodways. Board staff recommends that you review Title 23 Standards, including Sections 112 (Streams Regulated and Nonpermissible Work Periods), 116 (Borrow and Excavation Activities – Land and Channel), 121 (Erosion Control), 122 (Irrigation and Drainage Ditches, Tile Drains, and Septic Systems), 123 (Pipelines, Conduits, and Utility Lines), 124 (Abandoned Pipelines and Conduits), 128 (Bridges), 129 (Water, Oil, and Gas Wells), 131 (Vegetation), and 132 (Bicycle Trails). Any deviation or variation from these standards will require approval from the Board.

Responsibility of the Central Valley Flood Protection Board

The Board is the State's regulatory agency responsible for enforcing appropriate standards for the construction, maintenance, and operation of the flood control system that protects life, property, and habitat in California's Central Valley. The Board serves as the State coordinator between local flood management agencies and the federal government, with the goal of providing the highest level of flood protection possible to California's Central Valley.

Sacramento County
September 9, 2024
Page 2

The Board operates under authorities as described in California Water Code (Water Code), which requires the Board to oversee future modifications or additions to facilities of the State Plan of Flood Control (SPFC).

Encroachment Permit

Per California Code of Regulations, Title 23, Waters, Division 1 (Title 23), Section 6, approval by the Board is required for all proposed work or uses, including the alteration of levees within any area for which there is an Adopted Plan of Flood Control within the Board's jurisdiction. In addition, Board approval is required for all proposed encroachments within a floodway, on adjacent levees, and within any Regulated Stream identified in Title 23, Table 8.1. Specifically, Board jurisdiction includes the levee section, the waterward area between project levees, a minimum 10-foot-wide strip adjacent to the landward levee toe, the area within 30 feet from the top of bank(s) of Regulated Streams, and inside Board's Designated Floodways. Activities outside of these limits which could adversely affect Federal-State flood control facilities, as determined by Board staff, are also under the Board's jurisdiction. Permits may also be required for existing unpermitted encroachments or where it is necessary to establish the conditions normally imposed by permitting, including where responsibility for the encroachment has not been clearly established or ownership or uses have been changed.

Flood Impacts Analysis

Pursuant to Section 15 of Title 23, the Board may deny an encroachment permit if the proposed project could:

- Jeopardize directly or indirectly the physical integrity of levees or other works
- Obstruct, divert, redirect, or raise the surface level of design floods or flows, or the lesser flows for which protection is provided
- Cause significant adverse changes in water velocity or flow regimen
- Impair the inspection of floodways or project works
- Interfere with the maintenance of floodways or project works
- Interfere with the ability to engage in flood fighting, patrolling, or other flood emergency activities
- Increase the damaging effects of flood flows
- Be injurious to, or interfere with, the successful execution, functioning, or operation of any adopted plan of flood control
- Adversely affect the State Plan of Flood Control, as defined in the California Water Code

The Board, as a Responsible Agency under the California Environmental Quality Act (CEQA), will review and consider the environmental effects of the proposed project identified in the DEIR, and will reach its own conclusions on whether and how to approve the project involved (14 CCR 15096, subd. (a)). This includes direct impacts to facilities under construction, as well as indirect impacts from the proposed project to surrounding facilities. Accordingly, the comments herein are intended to assist in the development of a robust CEQA document capable of supporting the Board's permitting process.

Closing

The potential risks to public safety, including increased flood risks, need to be considered when developing proposed projects that seek to modify flood control works or the hydrology of the

Sacramento County

September 9, 2024

Page 3

water ways. Board staff is available to discuss any questions you have regarding the above comments. Please contact Jordan Robbins at (916) 524-3454, or via email at Jordan.Robbins@CVFlood.ca.gov if you have any questions.

Sincerely,

Jamie Silva

Jamie Silva
Environmental Program Manager

cc: Office of Planning and Research
State.Clearinghouse@opr.ca.gov

From: [Newton, Julie](#)
To: [Newton, Julie](#)
Subject: FW: West Sacramento Master Plan: Co control num: PLNP2008-00240
Date: Monday, September 9, 2024 10:53:31 AM

From: JOYCE ZDYRKA <jzdyrka@sbcglobal.net>
Sent: Sunday, September 8, 2024 8:31 PM
To: Carrico, Emma <carricoe@saccounty.gov>
Subject: West Sacramento Master Plan: Co control num: PLNP2008-00240

EXTERNAL EMAIL: If unknown sender, **do not** click links/attachments.
If you have concerns about this email, please report it via the Phish Alert button.

My comment on this master plan is that it is taking up too much open land space. Endangered flora and fauna reside in this area and would be wiped out. No planned parks, etc. would save them. Also, why are we expanding outward? Are we trying to become LA? We have a lot of commercial spaces that have been unused or abandoned that would be perfect infilling. The land space you are talking about is beautiful rolling hills that Sacramento needs to preserve, not fill in with more concrete and housing. The developers that are interested in this land are business groups interested in making money. Also, with Sacramento's abysmal homeless situation, this "new town" that is being proposed will not be addressing affordable housing. This plan appears to be backed by greed and not need. Until Sacramento can address affordable housing and getting people off the streets, it should get no approval for no new housing that destroys are beautiful, wild open spaces.



September 9, 2024

Via Email to: CEQA@saccounty.gov

Environmental Coordinator
Department of Community Development, Planning and Environmental Review Division
827 7th Street, Room 225
Sacramento, CA 95814

**RE: Control Number PLNP2008-00240 – West Jackson Highway Master Plan
Draft Environmental Impact Report dated July 2024
Comments by Cordova Recreation and Park District**

ENVIRONMENTAL REVIEW

As a part of the entitlement process for the West Jackson Highway Master Plan (WJHMP) Sacramento County circulated a Notice of Availability (NOA) regarding the Draft Environmental Impact Report (DEIR) on July 25, 2024. The *Draft West Jackson Highway Master Plan* document (MP) is not referenced as an appendix of the DEIR but is found on the County website line provided in the NOA. Meetings with the Vineyard and Cordova Community Planning Advisory Councils (CPACs) were held on August 8 and 22, 2024. Agenda packets for the CPACs included the draft Master Plan document dated June 2024 which informs the DEIR. The draft Master Plan is also an attachment to the September 9, 2024 Sacramento County Planning Commission Agenda Item 3.

Cordova Recreation and Park District (the "District" or CRPD) has submitted written comments on this project three times previously: in response to the original Notice of Preparation on October 17, 2013; on June 1, 2017 in response to the Revised Notice of Preparation (rNOP); and on October 8, 2021 in response to the County's circulation of Alternatives 1A, 1B and 1C dated August 31, 2021.

The proposed WJHMP is 5,913 acres. Approximately 2,845 acres are within the boundaries of CRPD. The remaining WJHMP acreage is within the Southgate Recreation and Park District.

District staff met Applicant representatives and County planning staff on March 23, 2017, to gather additional information while preparing comments on the rNOP. There were follow up meetings with the Applicants and County staff in December 2021 to discuss CRPD's October 8, 2021, comment letter. The Applicants provided CRPD a written response on February 2, 2022. In 2023 and 2024 the project team discussed park impact fees and the project implementation process.

Land Use

On page 3-4, Alternative 1-C is described as the Applicants' preferred alternative, and the foundation of the plan evaluated in the DEIR. CRPD focused its review on Alternative 1-C and has not evaluated other

alternatives presented in the DEIR. CRPD appreciates the applicants have adjusted the Land Use Plan DEIR Figure 2-9 and 17-1 to reflect earlier comments made by CRPD.

Table 17-5 “Parkland Dedication Requirements – Cordova” indicates 94.7 acres of parkland will be provided in CRPD’s jurisdiction (required parkland dedication is listed as 92.5 acres). Figures 2-9 and 17-1 show two parks in CRPD’s jurisdiction large enough to be community parks, one in the northeast corner (24.2 acres) and one in the middle north of Rock Creek Parkway (22.4 acres) totaling 46.6 acres of community park. CRPD assumes the remaining 48.1 acres of parks in CRPD’s jurisdiction will be developed as neighborhood parks and are distributed around the rest of CRPD’s jurisdiction. [Note: acreage labels on the park sites are difficult to read].

In previous letters CRPD requested the DEIR clearly illustrate the boundary separating CRPD and Southgate Recreation and Park District. The reader was not able to find a map that clearly shows the boundary line between CRPD and SRPD. CRPD recommends Figure 17-1 “Park Locations” is the logical figure to show the boundary line.

As mentioned in previous correspondence, CRPD does not grant Quimby parkland credit for land encumbered with utility easements, regional trails, storm drainage basins, wetlands and habitat areas that restrict development for recreational purposes. Where adjacencies of encumbered parcels exist, the District is open to discussions about joint use agency programming and maintenance of encumbered parcels where adequate funding is provided in perpetuity. The District has not addressed trails, open space, detention areas, wetlands, or habitat areas as part of this review.

As requested in CRPD’s rNOP comment letter, the EIR should consider the full range of facilities that could be placed on future park sites in the WJHMP. CRPD’s June 1, 2017, comment letter referenced an earlier version of a *CRPD Park Impact Fee Nexus Study* adopted April 8, 2014 (2014 Nexus Study). In June 2021 CRPD’s Board of Directors adopted a *Park Impact Nexus Study for the Unincorporated Sacramento County Area of the CRPD* (2021 Nexus Study) found at [2021 CRPD NexusStudy \(cordovarpd.gov\)](https://www.cordovarpd.gov/2021-CRPD-NexusStudy). The list of amenities planned for CRPD parks in the County jurisdiction has been reduced slightly from the 2014 Nexus Study. Facilities that could be placed in WJHMP parks are listed in Tables 5, 6, 7 and 8 of the 2021 Nexus Study.

Quimby Parkland

As previously requested by CRPD, the Applicants have adjusted the acreage factor for residential housing units to reflect Sacramento County Code Section 22.40.045. The updated Quimby parkland calculations indicate a requirement for 92.5 acres. The project provides 94.7 acres.

Traffic and Transportation

The arterial designation of Jackson Road will have a significant impact the Cordova Golf Course (APN 063-0020-036). The existing right-of-way width at the golf course is approximately 90 feet wide. The future total width of the improved Jackson Road arterial shows a 96-foot-wide right-of-way and additional easements that total 196 feet. CRPD estimates improvements will extend an additional 53 feet +/- beyond the existing right-of-way into the golf course property. This will reduce acreage available for the existing driving range and parking lot. A redesign will be required to accommodate a reconfigured driving range and parking lot that could push into a portion of the golf course proper.

At this conceptual level the WJHMP does not illustrate all roadways that will be built for the project. The *Draft West Jackson Highway Master Plan* (MP), page 6-12, Policy 6.15 states "Neighborhood parks should generally have street frontages on at least two sides except those abutting open spaces, trails, drainage channels, school sites and public spaces." CRPD standards (as stated in earlier correspondence) require that neighborhood parks have street frontage on three sides where elementary school property can be substituted for one street.

CRPD previously mentioned that placement of traffic signals and pedestrian crosswalks should be considered where community park facilities may generate significant volumes of traffic. The applicants February 2, 2022, response letter stated that the need for and specific location of a traffic light will be determined as part of subsequent entitlements. CRPD will also be reviewing subsequent entitlements to include on-street parking adjacent to neighborhood parks and wherever possible augmenting community park off-street parking lots with on-street parking.

The District considers trails to be a transportation element and under the purview of other agencies. This scoping comment letter does not include analysis of proposed trails.

Airport Compatibility

Page 7-12 of the DEIR provides information about Mather Airport Safety Zones. One CRPD neighborhood park is proposed in District 2 that is partially in Safety Zone 3 near proposed high-density residential and surrounded by proposed employment land uses. Outdoor Small Assembly Facilities and Indoor Recreation/Small Assembly Facilities are considered incompatible in Safety Zone 3. Other government buildings and some residential units are considered conditionally compatible in Safety Zone 3. The programming for this neighborhood park will need to consider Safety Zone compatibility.

One CRPD neighborhood park is proposed in District 1 that is in the CNEL 60 contour line. Per the Applicants February 2, 2022, response letter, this park would only be constructed if the County approves residential in the 60 CNEL contour. It is reasonable for CRPD to accept a neighborhood park surrounded by residential use that is also within the 60 CNEL contour.

As requested by CRPD the Applicants moved the proposed community park in the northeast portion of the project to outside of the 60 CNEL contour line to lessen noise disturbance to outdoor recreational uses.

Hydrology and Water Quality:

CRPD provided the following comment in its June 1, 2017, comment letter, "Constructed park facilities including programmed sport fields should be above the 100-year flood plain. The District does not grant Quimby park land credit for land encumbered with utility and storm drainage basins."

Figure 14-2 illustrates the current 100-year floodplain in blue (1% Annual Chance Flood Hazard). The 100-year floodplain covers some of CRPD's jurisdiction in the northeastern portion of the project. Confirm the project grading plan will provide Quimby parkland above the 100-year flood plain.

Water Supply

The first sentence of DEIR Chapter 20 "Water Supply" states, "The following chapter addresses the ability of the existing water service provider to supply drinking water to the project." The second paragraph of Chapter 20 states that the County received one comment from the Cordova Community

Planning Advisory Council regarding the sources of water. This paragraph does not mention that CRPD provided the following comment in its June 1, 2017, comment letter, "The project technical studies should demonstrate there will be adequate domestic water into the future sufficient to irrigate athletic fields and provide turf in both neighborhood and community parks as a public resource in perpetuity."

In the subsection "Regulatory Settings" on page 20-11 the California Model Water Efficient Landscape Ordinance (MWEL) is described and implies that the water supply demand includes adequate domestic water within WJHMP to provide landscape water in compliance with MWEL.

California American Water will be the purveyor of water to the future CRPD parks in WJHMP. Provide confirmation that California American Water will have sufficient domestic water supply to irrigate MWEL compliant landscapes in future WJHMP parks.

Is the use of recycled water to irrigate public landscapes a feasible option within the CRPD boundary of the WJHMP?

Topography and Soils

Most of WJHMP soils within CRPD have been previously disturbed. The park sites should be included in geotechnical reports for mass grading of surrounding development. The geotechnical report should address providing suitable soils for park development and at a minimum meeting CRPD's park site criteria. The Developer committed to referencing these requirements in the Master Plan document and expects the project to be conditioned with the same (February 2, 2022 letter from Developers to CRPD). A very general reference is made in the MP Objective 6.2 that CRPD and SRPD will develop and maintain this park system in their respective Districts. Provide the location in the MP where CRPD's soil requirements are referenced.

CRPD's Design Standards and Slopes:

Chapter 6 of the MP addresses Parks and contains a subsection titled, "Slope of Former Mining Areas". CRPD's October 8, 2021, comment letter stated, "The shape of the park land must allow for programming with ball fields, playgrounds and gathering areas. Land with steep, unprogrammable slopes is not eligible for Quimby park land credit". CRPD made this comment in its rNOP letter, "The topography of proposed park sites must be suitable for active recreational programming (fairly level) and have the capacity for compliance with Americans with Disabilities Act. Visibility from street level is important for safety and security in the parks. The DEIR should address the suitability of soil on proposed park sites to sustain active parks and the need to import fertile soils and/or provide soil amendments to meet District standards."

The Developer committed to referencing CRPD's requirements in the Master Plan document. They also stated the parks will ultimately be developed consistent with applicable District standards (February 2, 2022 letter from Applicants to CRPD).

CRPD found one mention of the requirement to comply with park district standards on page 32 of the "Draft Public Facilities Finance Plan" in section B. Public Facilities, 1. Parks – Neighborhood & Community which states, "...Each park district has a set of service standards that will apply to the Project and guide delivery of the required park sites..." Provide the location in the DEIR and/or the MP where this is stated. If it is not there, this statement should be added to the Park sections of both the DEIR and the MP.

Finance

Public Facilities Finance Plan

Page 7, 3rd and 4th paragraphs: These paragraphs discuss the concept of “this planning-level PFFP”. It also states, “Subsequent implementation level PFFP’s will include an updated equitable cost allocation that is based on the specific needs of each development area.” At what phase of entitlement approvals will the implementation level PFFP be required of the Applicants by the County? At what phase of entitlement approvals will a Nexus Study for Park Impact Fees be required of the Applicants by the County?

Page 7, last paragraph: States additional details on cost estimates are provided in *Table 2, Section III*, but there is not a Table 2 in Section III. Table 2 is in Section II titled “Public Improvement Cost Estimates”. Footnote [1] states estimates are based on engineer estimates from Wood Rodgers or existing fee programs. CRPD cannot find cost estimate backup information for park costs in the draft PFFP.

Page 18, 5th paragraph: The description of CRPD and SRPD should be similar in context. Please add the following information describing CRPD: “CRPD encompasses 75 square miles and maintains over 600 acres. CRPD has 50 parks, five facilities with community meeting space, a sports complex, two community pools, a splash park, five splash pads, and the Cordova Golf Course.”

Page 21, Table 3: CRPD did not see in the documents where a requirement for annual inflation adjustments for fees and estimated construction costs is stated. What inflation year was used for the fees listed and where does it state in the document that impact fees and estimated construction costs will be adjusted annually for inflation?

Page 24, Table 4: “Development Impact Fees (Non-residential), Other Jurisdiction Fees, footnote [1] based on agency fee schedules”. The fee amounts listed in this table for non-residential building square footage is much higher than those listed in CRPD’s 2021 Nexus Study. The Applicants’ proposed methodology for generating park impact fee revenue places a much higher burden on the non-residential land uses than CRPD’s 2021 Nexus Study. The chart below compares the WJHMP non-residential square-foot fee to CRPD’s 2021 Nexus Study.

Area A	MU Commercial	Commercial	Employment	Industrial
WJHMP PFFP	2.56	2.56	4.55	0.78
CRPD Nexus Study	0.61	0.61	0.94	0.41

CRPD is concerned the balance of park development impact fee revenue allocated to employment land use and non-residential is too high compared to the residential allocation. The ratio of park development impact fees collected utilizing CRPD’s 2021 Nexus Study rates would be 88% from residential and 12% from non-residential. Utilizing WJHMP’s rates 59% would be collected from residential and 41% from non-residential.

The Quimby parkland requirements in Sacramento County Code 22.40.035 are calculated only from residential land use categories. County Code does not require Quimby parkland dedication from non-

residential uses. What is the nexus for the much higher park development impact fee proposed for non-residential land uses?

CRPD's experience has been the single-family residences are the first to be developed in a project. Multi-family and non-residential development lags by years or decades behind single-family. If 41% of the park development impact fee revenue is being collected much later, funding will not be available to deliver parks with adequate basic construction and amenities to new single-family residents within a reasonable time (maybe more than ten years after residents move in).

CRPD has questions related to the impact of WJHMP's methodology for funding park construction:

1. Are there existing non-residential uses in the land use plan that will remain in the project that are part of the total non-residential square footage estimates?
2. If so, have those existing non-residential land uses been included in the anticipated park impact fee revenue?
3. If so, will the existing non-residential land uses pay park impact fees retroactively?
4. What is the anticipated schedule for development of the non-residential land uses and multi-family developments compared to the development of surrounding single-family residential uses?

Page 33, CRPD Parks: Park Facilities – Neighborhood: Lists 32.5 acres of neighborhood parks. The DEIR and Master Plan documents state a total of 94.7 acres are being dedicated. There should be 48.1 acres of neighborhood parks.

Page 33, CRPD Parks: Park Facilities – Community: Lists 62.1 acres of community parks. The DEIR and Master Plan documents state a total of 94.7 acres are being dedicated. There should be 46.6 acres of community parks.

Page 33, Funding Sources/Strategy: Please provide additional rows in the chart labeled "Park Funding Summary" that show the total revenue from each land use in Tables 3 and 4.

Appendix C of the PFFP correctly references the proper CRPD CFD No. 2018-1 in each of the tables.

Urban Services Plan

Page 44 "Park Maintenance and Recreation Services" section seems out of place inserted into the middle of the Transit section.

Page 47 references the proper CRPD CFD No. 2018-1.

Page 49, Table 5.6 provides a breakdown of neighborhood and community park acres that is more consistent with the DEIR and the Master Plan than the acres provided in the PFFP. It is slightly off using a total acreage of 92.54 instead of the provided acres of 94.7 acres. Table 5.6 lists 45.49 acres of neighborhood parks instead of 48.1 and 47.09 acres of community park instead of 46.6.

CRPD was not able to find Appendix F: "Parks Maintenance" that was "Provided Under Separate Cover". Please provide.

The District will review the future Implementation Public Facility Finance Plan and Nexus Study for compliance with the District's adopted level of service and 2021 Nexus Study for development costs which must include annual inflationary factors.

Summary

Below is a list of questions and comments in this comment letter for your convenience in providing written responses:

1. Confirm the project grading plan will provide Quimby parkland above the 100-year flood plain.
2. Provide confirmation that California American Water will have sufficient domestic water supply to irrigate MWELO compliant landscapes in future WJHMP parks.
3. Is the use of recycled water to irrigate public landscapes a feasible option within the CRPD boundary of the WJHMP?
4. Provide the location in the MP where CRPD's soil requirements are referenced.
5. CRPD found one mention of the requirement to comply with park district standards on page 32 of the "Draft Public Facilities Finance Plan" in section B. Public Facilities, 1. Parks – Neighborhood & Community which states, "...Each park district has a set of service standards that will apply to the Project and guide delivery of the required park sites..." Provide the location in the DEIR and/or the MP where this is already stated. If it is not there already this statement should be added to the Park sections of both the DEIR and the MP.
6. At what phase of entitlement approvals will the implementation level PFFP be required of the Applicants by the County? At what phase of entitlement approvals will a Nexus Study for Park Impact Fees be required of the Applicants by the County?
7. PFFP, Page 18, 5th paragraph: The description of CRPD and SRPD should be similar in context. Please add the following information describing CRPD: "CRPD encompasses 75 square miles and maintains over 600 acres. CRPD has 50 parks, five facilities with community meeting space, a sports complex, two community pools, a splash park and five splash pads, and the Cordova Golf Course."
8. PFFP, Page 21, Table 3: What inflation year was used for the fees listed and where does it state in the document that impact fees and estimated construction costs will be adjusted annually for inflation?
9. PFFP, What is the nexus for the much higher park development impact fee proposed for non-residential land uses?
10. CRPD has questions related to the impact of WJHMP's methodology for funding park construction:
 - a. Are there existing non-residential uses in the land use plan that will remain in the project that are part of the total non-residential square footage estimates?

- b. If so, have those existing non-residential land uses been included in the anticipated park impact fee revenue?
 - c. If so, will the existing non-residential land uses pay park impact fees retroactively?
 - d. What is the anticipated schedule for development of the non-residential land uses and multi-family developments compared to the development of surrounding single-family residential uses?
11. The total amount of Quimby parkland provided and the spread between neighborhood and community park acres should be consistent across the DEIR, MP and various appendices and attachments. Revise calculations as necessary.
12. As mentioned in agenda item 3 staff report for the Sacramento County Planning Commission September 9, 2024 meeting, the Final EIR and land use entitlements will be presented at future Planning Commission and Board of Supervisor meetings. CRPD has a requirement for a Park Development Agreement between the developers and CRPD. Will this requirement be addressed in the development agreements between the Applicants and the County?
13. When will the draft Conditions of Approval for the WJHMP (including those specific to CRPD) be circulated by County staff for review and comment by CRPD?

The District appreciates the County's commitment to planning environmentally responsible and sustainable communities. We look forward to future engagement in this project. We understand the goal is to take the Final EIR and additional entitlement documents such as development agreements and Conditions of Approval to the County Planning Commission and the County Board of Supervisors in the first half of 2025. Please continue to forward us WJHMP documentation relevant to CRPD. Please do not hesitate to contact me if you have any questions.

Sincerely,


Laura L. Taylor, ASLA
Park Planning and Development Manager
Cordova Recreation and Park District

CC: Patrick Larkin, CRPD General Manager
Matt Goodell, CRPD CFO
Robert Thurbon, CRPD Attorney
Todd Smith, County Planning Director
Emma Carrico, County Planning & Environmental Review
Vanessa Lieberman, County Engineering Special Districts
BoardClerk@saccounty.gov
Andrew Saltmarsh, CRPD Planning Technician

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

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September 9, 2024

File No.: 260.14970.SCH2013092021

Planning Director
Sacramento County Planning
827 7th Street, Room 225
Sacramento, CA 95814
Attention: Julie Newton

The California Highway Patrol's (CHP) East Sacramento Area office received a "Notice of Completion" Environmental Impact Report for the proposed West Jackson Highway Master Plan, State Clearing House (SCH) #2013092021. The CHP East Sacramento Area was asked to evaluate potential traffic safety and congestion issues relative to the proposed project located in various locations within the cities of Sacramento and Rancho Cordova.

After careful review, it was determined the proposed magnitude of the project would likely place additional strain on existing public safety resources. The area is currently experiencing significant growth, and the addition of over 16,000 residential dwelling units, almost 1,000 acres of designated commercial property and eight schools would likely impact traffic safety, resulting in extended response times attributable to an increase in call volume and vehicular traffic on SR-16, and the surrounding roadways located within unincorporated Sacramento County.

Should you have any questions, please contact me or Sergeant Matt Wells at (916) 464-1450.

Sincerely,

A handwritten signature in blue ink that reads "Matt Wells" followed by a small "F.R.".

B. J. MAYNARD, Lieutenant
Commander
East Sacramento Area



California Department of Transportation

DIVISION OF AERONAUTICS - M.S. #40
1120 N STREET
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September 9, 2024

Julie Newton
Environmental Coordinator
Sacramento County
827 7th Street, Room 225
Sacramento, CA 95814

Electronically Sent < newtonj@saccounty.gov >

Re: SCH # 2013092021 - West Jackson Highway Master Plan

Dear Ms. Newton:

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), has reviewed the Draft Environmental Impact Report (EIR) for the West Jackson Highway Master Plan (Project). The Division of Aeronautics collaborates with cities, counties, and Airport Land Use Commissions (ALUC) to ensure compliance with the State Aeronautics Act (California Public Utilities Code Section 21001 et seq.). We appreciate the opportunity to participate in the EIR review process.

Sacramento County is proposing a master plan, titled the West Jackson Highway Master Plan (WJHMP), encompassing approximately 5,913 acres. The proposed Project is located along State Route 16, Jackson Highway, in generally the geographic center of Sacramento County. The WJHMP provides for 16,484 residential dwelling units; 988 acres of commercial, employment and industrial land; 2,101 acres of parks and open space; and six elementary schools, one middle school, and one high school, and will require amendments to the Sacramento County General Plan. The plan area is located on the southern boundary of Mather Airport.

Compliance with Airport Land Use Compatibility Plan (ALUCP)

Pursuant to the State Aeronautics Act, California Public Utilities Code Section 21676(b) mandates that local agencies refer proposed amendments to general or specific plans within airport land use commission boundaries to the commission for review. If the commission deems

the proposed action inconsistent with its plan, the referring agency will be notified. Any development within safety zones or airport influence areas must comply with the safety criteria and restrictions outlined in the Airport Land Use Compatibility Plan(s).

The Project site lies entirely within the Airport Influence Area of Mather Airport, with portions of the Project site located within Safety Zone 2 (Inner Approach/Departure Zone), Safety Zone 3 (Inner Turning Zone), Safety Zone 4 (Outer Approach/Departure Zone), and Safety Zone 6 (Traffic Pattern Zone). Therefore, it must adhere to the safety criteria and restrictions outlined in the 2022 Mather Airport Comprehensive Land Use Plan (ALUCP), adopted by the ALUC pursuant to the PUC, Section 21674.

The ALUCP is crucial for minimizing noise nuisance and safety hazards around airports while promoting orderly development. The ALUC is responsible for assessing potential risks to aircraft, airspace users, and people on the ground near the airport.

Noise Compatibility

A portion of the plan area falls within the Mather Airport 60-65 decibel (dB) community noise equivalent level (CNEL) noise contour lines demonstrated in the ALUCP. Development within this area must adhere to the noise criteria and use restrictions outlined in the plan. Due to its proximity to the airport, the Project site may be subject to aircraft overflights and subsequent aircraft-related noise impacts.

Noise Sensitive Land Uses and Considerations

The project may encompass noise-sensitive land uses as defined by the Public Utilities Code Section 21669.5(3). This includes residential developments such as single-family and multi-family dwellings. Additionally, Section 21669.5(4) defines a "noise-sensitive project" as new construction or reconstruction for planned noise-sensitive land use within an airport's Community Noise Equivalent Level (CNEL) of 65 decibels (dB) or higher.

While California Code of Regulations (CCR: Title 21 CCR, §5006) defines 65 dB CNEL as the "acceptable level" for residents near airports, the Caltrans Aeronautics California Land Use Planning Handbook (Handbook) advises against using this standard for new noise-sensitive development. To mitigate the impact of aircraft noise, any new residential development within the airport's 65 dB CNEL contour should be designed and constructed to ensure that interior noise levels in all habitable rooms do not exceed 45 dB CNEL. Communities should explore establishing a lower CNEL threshold for new residential development around the airport (Handbook, PG 4-7). To prevent this project from expanding the airport's Noise Impact Area (NIA), each residential unit should grant the airport proprietor an avigation easement, permitting aircraft noise over the property. However, while these construction measures and

the easement address interior noise, they will not reduce exterior aircraft noise levels, and future residents may still experience annoyance from aircraft noise in the surrounding area.

By implementing these recommendations, the project can minimize noise impacts on future residents and ensure responsible development near the airport.

Other Airport Hazards

California Public Utilities Code Section 21659 prohibits structural hazards near airports. Structures should not be at a height that will result in penetration of the airport imaginary surfaces. In accordance with Federal Aviation Regulation, Part 77 "Objects Affecting Navigable Airspace" a Notice of Proposed Construction or Alteration (Form 7460-1) may be required by the Federal Aviation Administration (FAA). For further information or a copy of Form 7460-1, please refer to the FAA website

<https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.

We recommend further review of potential compatibility concerns related to airport obstructions and hazards to flight, such as:

- **Wildlife attractants:** Project elements (e.g., open waste disposal areas) that could attract wildlife, posing a hazard to aircraft.
- **Lighting:** Improper lighting design or excessive light intensity could interfere with night-time airport operations and can cause safety hazards to pilots.
- **Glare:** Reflective surfaces (e.g., extensive use of solar panels) could create glare that disrupts pilots' visibility.

Thank you for the opportunity to review and comment. If you have any questions, please contact me by email at tiffany.martinez@dot.ca.gov.

Sincerely,



Tiffany Martinez
Associate Transportation Planner
Division of Aeronautics

Ms. Julie Newton, Environmental Coordinator

September 9, 2024

Page 4

c: State Clearing House <state.clearinghouse@opr.ca.gov>,
Matthew Friedman, Chief Office of Aviation Planning, <matthew.friedman@dot.ca.gov>,
Nirupama Stalin, Senior Transportation Planner <nirupama.stalin@dot.ca.gov>



PLANNING DIVISION
2729 Prospect Park Drive | Rancho Cordova, CA 95670
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September 9, 2024

Sacramento County
Department of Community Development, Planning and Environmental Review Division
827 7th Street, Room 225
Sacramento, CA 95814

RE: West Jackson Highway Master Plan Notice of Availability of a Draft Environmental Impact Report

To Whom it May Concern:

The City of Rancho Cordova (City) appreciates the opportunity to comment on the West Jackson Highway Master Plan (WJHMP) Draft Environmental Impact Report (DEIR). We are very interested in this project due to its size and because of its location within the City's Planning Area.

Land Use

Rancho Cordova's General Plan Planning Area contains land outside the City Limits that bears relation to the City's planning efforts. The WJHMP plan area is outside of the Rancho Cordova City Limits but is within the Mather Planning Area (north of Kiefer Blvd) and within the Jackson Planning Area (south of Kiefer Blvd) of the Rancho Cordova General Plan Planning Area. These Planning Areas have conceptual land use plans that reflect the City's long-term planning goals, including development capacities for different land use types.

The City's General Plan acknowledges that land in both the Mather and Jackson Planning Areas contain development constraints related to environmentally sensitive vernal pool and marshland habitat, as well as Mather Field safety and flight zones. The City's General Plan identified that the highest potential for development in the Mather Field and Jackson Planning areas include the areas north of Kiefer Blvd along Bradshaw Road, and near the intersection of Sunrise Blvd and Jackson Rd (Hwy 16). The City's General Plan also establishes density and intensity of development within the City Limits and the General Plan Planning Area. The development potential for the Mather and Jackson Planning Areas planned for in the City's General Plan is summarized below and compared to the WJHMP.

Planning Area ¹	Acres	Dwelling Units	Density	Population	Employment
Mather	6,306	1,982	3.55	5,175	15,841
Jackson	8,602	5,806	1.93	15,457	10,753
WJHMP ²	5,913.3	16,484	n/a	45,661	29,233

¹ City of Rancho Cordova, 2006a. Rancho Cordova General Plan. Adopted June 26, 2006. Available: <https://www.cityofranchocordova.org/home/showpublisheddocument/14279/636820350426270000>. Accessed August 16, 2024. P 32.



According to the DEIR’s Project Description, the WJHMP would sustain a population of 45,661 residents, and would provide 16,484 dwelling units and 29,233 jobs. These projections greatly exceed what was planned for in the City’s General Plan for the Mather and Jackson Planning Areas.

In terms of building space, the City’s General Plan buildout conditions for the Mather and Jackson Planning Areas are shown below and compared to the WJHMP. The City’s General Plan buildout projections for the Mather and Jackson Planning Areas are 5,148,609 sf and 5,405,896 sf, respectively, compared to the total projected building square footage of 13,508,392 sf in the WJHMP Plan Area.

Planning Area ³	Commercial Square Footage	Office Square Footage	Industrial Square Footage	Total Square Footage
Mather	98,638	2,202,951	3,104,307	5,405,896
Jackson	205,424	1,879,425	3,063,760	5,148,609
WJHMP ⁴	3,165,723	“Employment” 7,099,844	2,017,699	13,508,392

The WJHMP projects a population that is over 121% higher and accordingly proposes an increase in development (building square footage) greater than what was envisioned in the City’s conceptual land use and planning scenarios for this area. In addition, land uses envisioned in the General Plan for the Jackson Planning Area are a transition from urban to rural uses to help define the City’s “edge.”

The City of Rancho Cordova is currently in the process of updating its General Plan. Ongoing coordination with the County will help inform decisions related to updating the City’s Planning Area, sphere of influence, and land use designations.

Biological Resources

The DEIR includes Mitigation Measure BR-8A, which lays out the protection and compensation ratios for native trees. The City’s Tree Ordinance defines Protected Trees as native oaks greater in 6dbh, any tree 12 dbh or greater on non-residential property, and any tree 24 dbh or greater on residential property. The County should consider expanding tree protection beyond native trees, in accordance with Section [19.12](#) of the Rancho Cordova Municipal Code (RCMC).

² County of Sacramento, 2024. West Jackson Highway Master Plan Draft Environmental Impact Report. Available: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/WestJacksonHighwayMasterPlan.aspx>. Accessed: August 21, 2024. P 2-30 through 2-33.

³ City of Rancho Cordova, 2006b. Rancho Cordova General Plan Draft Environmental Impact Report. Available: <https://www.cityofranchocordova.org/departments/community-development/planning/planning-division-document-library>. Accessed August 16, 2024. P 3.0-18.

⁴ County of Sacramento, 2024. West Jackson Highway Master Plan Draft Environmental Impact Report. Available: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/WestJacksonHighwayMasterPlan.aspx>. Accessed: August 21, 2024. P 2-30, 2-30

Parks and Recreation

The City believes that there are many benefits to providing adequate parks and recreational facilities for residents within a community. The WJHMP includes open space and various neighborhood and community parks that provide opportunities for pedestrian and bike pathways. As stated on page 17-5 of the DEIR, Cordova Recreation and Park District (CRPD) Impact Fees were considered. The City encourages the County to adopt the CRPD Impact Fee for construction of these various parks. Adopting the CRPD Park Impact fee will ensure that a similar level of park and recreational facilities enjoyed by the residents in the City of Rancho Cordova will also be constructed for the residents of the WJHMP communities.

Noise

Existing sensitive receptors within the City may be impacted by construction and operational noise from the WJHMP. The following Rancho Cordova General Plan policies/actions are applicable to transportation noise and should be included in the DEIR:

- **Policy N.1.5:** Mitigate noise created by the construction of new transportation noise sources (such as new roadways or new light rail service) to the maximum extent feasible to comply with the City's standards.
- **Policy N.2.2:** Ensure that operational noise levels of new roadway projects will not result in significant noise impacts.
- **Action N.2.2.1:** Assess the significance of the noise increase of all roadway improvement projects in existing areas according to the following criteria:
 - Where existing traffic noise levels are less than 60 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +3 dB L_{dn} increase in noise levels due to roadway improvement projects will be considered significant;
 - Where existing traffic noise levels range between 60 and 65 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +3 dB L_{dn} increase in noise levels due to roadway improvement projects will be considered significant; and
 - Where existing traffic noise levels are greater than 65 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +1.6 dB L_{dn} increase in noise levels due to roadway improvement projects will be considered significant.
- **Policy N.2.3:** Emphasize mitigation methods other than soundwall installation to reduce noise to acceptable levels in residential areas originally constructed without soundwalls.

The DEIR noise analysis concludes that impacts related to long-term traffic noise would be significant and unavoidable, even with implementation of Mitigation Measures NO-3A through NO-3C. Roadways that would experience a substantial increase in operational traffic noise include several of the City's major arterials, including Bradshaw Road, Kiefer Blvd, and White Rock Road. There would be a substantial increase in traffic noise on Kiefer Blvd in the vicinity of Sunrise Blvd, which could impact existing and future residents in the Sunridge and Suncreek Specific Plan areas. The segment of Old Placerville Road between Routier and Rockingham would experience a substantial increase in noise (4dB), which could impact City residents to the northwest (i.e. along Sunrise Pines Dr., Maddiewood Cir). The design-level acoustical analysis described under Mitigation Measure NO-3B should include potentially impacted City residents, and all efforts to minimize noise in compliance with the City's Noise Ordinance for maximum transportation sound level exposure at residential land uses (60 L_{dn} /CNEL dB for exterior and 45 L_{dn} /CNEL dB for interior).

Table 16-19 of the DEIR shows there would be no substantial increase related to existing plus project traffic impacts on Jackson Highway between Sunrise Blvd and Grant Line Road. Just north of this segment is a planned development (Legado Specific Plan, previously referred to as Arboretum or the Waegell property). The Arboretum is mentioned in the cumulative chapter in Table 22-1 of the DEIR, but it listed as inactive. The project applicant recently submitted a land use entitlement for the Legado Specific Plan, and the project will soon undergo CEQA review. This development will cover approximately 1,344 acres of the 1,846-acre Grant Line North Planning Area. The Legado Specific Plan will include a variety of residential housing densities, commercial/mixed use space, and schools.

Transportation

The DEIR Figure 2-13, Proposed Roadway Network, identifies a 4-lane arterial connection north of Kiefer Boulevard. The 4-lane arterial is further identified as Roadway Segment 33 in Figure 13 of WJHMP Transportation Analysis Report. The DEIR in combination with the Local Transportation Analysis does not sufficiently analyze the impacts related to the extension of a 4-lane arterial that is partially within the Sacramento Mather Airport property and having northerly connection at the existing Routier Road/Old Placerville Road intersection.

Mitigation Measure TR-4A should be expanded to include the following roadway segment:

- Old Placerville Road from Happy Lane to Routier Ext/Routier Rd and Old Placerville Road. Per Table 29 and 30 in the WJHMP Local Transportation Analysis Report; mitigation for this segment includes widening to include 2 eastbound lanes in Existing Plus Project Scenario or widening to 6 lanes in the Cumulative Plus Project Scenario.

Mitigation Measure TR-4B (5th bullet) should be expanded to include the following roadway segments (changes are reflected in bold, italicized text):

- Grant Line Road and Prairie City Road, White Rock Road, Douglas Road, Kiefer Boulevard, Jackson Road, ***Happy Lane, Old Placerville Road, Excelsior Road*** and Sunrise Boulevard

Public Utilities

The DEIR states in Chapter 18 that impacts related to solid waste are less than significant. The remaining capacity and the estimated closure date for Kiefer Landfill stated in the DEIR is information from 2005. As the region continues to grow, local jurisdictions should plan for resources such as solid waste disposal, sewer capacity, and water supply in coordination to ensure future supplies can meet projected demands of new development. It would be helpful to have more current information regarding the landfill's capacity and projected closure date in order to fully determine environmental impacts.

Water Supply

The DEIR concludes that the WJHMP would be served by sufficient water supply through the year 2045. While a 20-year water supply projection is typical for this level of analysis, the WJHMP is not anticipated to reach full buildout until 2050. The Department of Water Resources⁵ estimates a 10% reduction in California's overall water supply by 2040 due to

⁵ Department of Water Resources. 2022. California's Water Supply Strategy, Adapting to a Hotter, Drier Future. August 2022. Available: <https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Water-Resilience/CA-Water-Supply-Strategy.pdf>. Accessed: August 19, 2024.

continued rising temperatures and decreased runoff. Increasing drought severity will be a large part of our region's future as climate change increases the frequency and magnitude of extreme weather in the region.

Table 20-11 of the DEIR shows a comparison of the Suburban-Rosemont PWS maximum daily water supply vs. demand through 2045. Between 2023-2045, the surplus supply is reduced by nearly half in normal years and more than half during dry years. Appendix B of the DEIR notes that turf reduction and irrigation controllers would be included into the project design as water conservation measures. Mitigation Measure CC-1, Greenhouse Gas Reduction Plan, includes implementing indoor water use efficiency. However, other water conservation mitigation measures are available, such as water supply monitoring, incorporating drought tolerant or xeriscape landscape practices, incorporating permeable driveways/porous pavement to reduce runoff and promote groundwater recharge, educating residents on water saving techniques, installation of greywater systems and water reuse, etc.

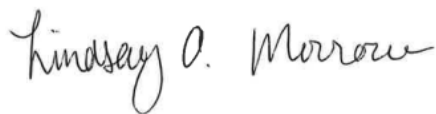
Impact HYD-2 of the DEIR states that new impervious surfaces would not substantially impede groundwater recharge because detention basins would facilitate groundwater recharge, and because the project would comply with applicable policies, plans, and regulations, including applicable BMPs. In terms of water supply, the plans listed are the South American Subbasin Groundwater Sustainability Plan and the Central Sacramento County Groundwater Management Plan, which include overarching actions that would be implemented by Groundwater Sustainability Agencies, rather than by the project proponent. The Water Supply Assessment documents that water supplies are sufficient for the next 20 years, or through the year 2045. With WJHMP buildout in 2050, increasing pressure on the water supply system related to increased demand from population growth and development and increased extreme weather events such as droughts, BMPs or AMMs that reduce water use from all sources (i.e. residential, industrial, commercial) and increase groundwater recharge should be considered.

Transit

As the transit system is being developed within the City and along the Jackson Corridor, both agencies along with transit service providers should develop a joint concept for service. A statement of joint transit system development should be added to the EIR.

In conclusion, it is Rancho Cordova's intent to engage in cooperative land use and circulation planning for areas outside of the City's jurisdiction that have an impact on the City. Rancho Cordova is currently working on a General Plan update, and coordination with the County will ensure future land use is planned collaboratively, with the ultimate goal of increasing the quality of life for residents.

Sincerely,



Lindsay A. Morrow
Senior Environmental Planner
Planning Division



Sent Via E-Mail

September 12, 2024

Environmental Coordinator
Sacramento County
Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814
ceqa@saccounty.net

Subject: West Jackson Highway Master Plan / EIR / 2013092021

Dear Ms. Newton:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Environmental Impact Report (EIR) for the West Jackson Highway Master Plan (Project, SCH 2013092021). This comment letter is an addendum to our comment letter provided on September 9, 2024.

As a Responsible Agency, SMUD's review of projects include supporting the goals of our 2030 Zero Carbon Plan. This plan is a flexible road map to eliminate greenhouse gas emissions from our electricity production by 2030, which is the most ambitious goal of any large utility in the United States, while maintaining reliable and affordable service. This ambitious goal puts the Sacramento region on the map as an example to follow and a region where innovative, climate-friendly businesses want to be. As a community-owned, not-for-profit utility, our customers and community are at the heart of all we do. By pursuing zero carbon, we're helping create a cleaner and healthier region for all.

Below are SMUD's comments to the EIR:

- SMUD's Jackson Bulk Electrical substation will be located at the 'Option 1' location as described on page 22-26.
- Due to the planned absence of gas infrastructure, the estimated electric demand figures on Page 22-25 are no longer accurate. Additionally, the number of proposed distribution substations required to serve the West Jackson Highway Master Plan will inevitably increase. SMUD preliminarily estimates 11-15 substation sites may be required due to the all-electric community demand. This figure is subject to change as more data becomes available on all-electric communities and businesses.

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 Project. If you have any questions regarding this letter, please do not hesitate to contact me at 916.732.5063, or by email at Kim.Crawford@smud.org.

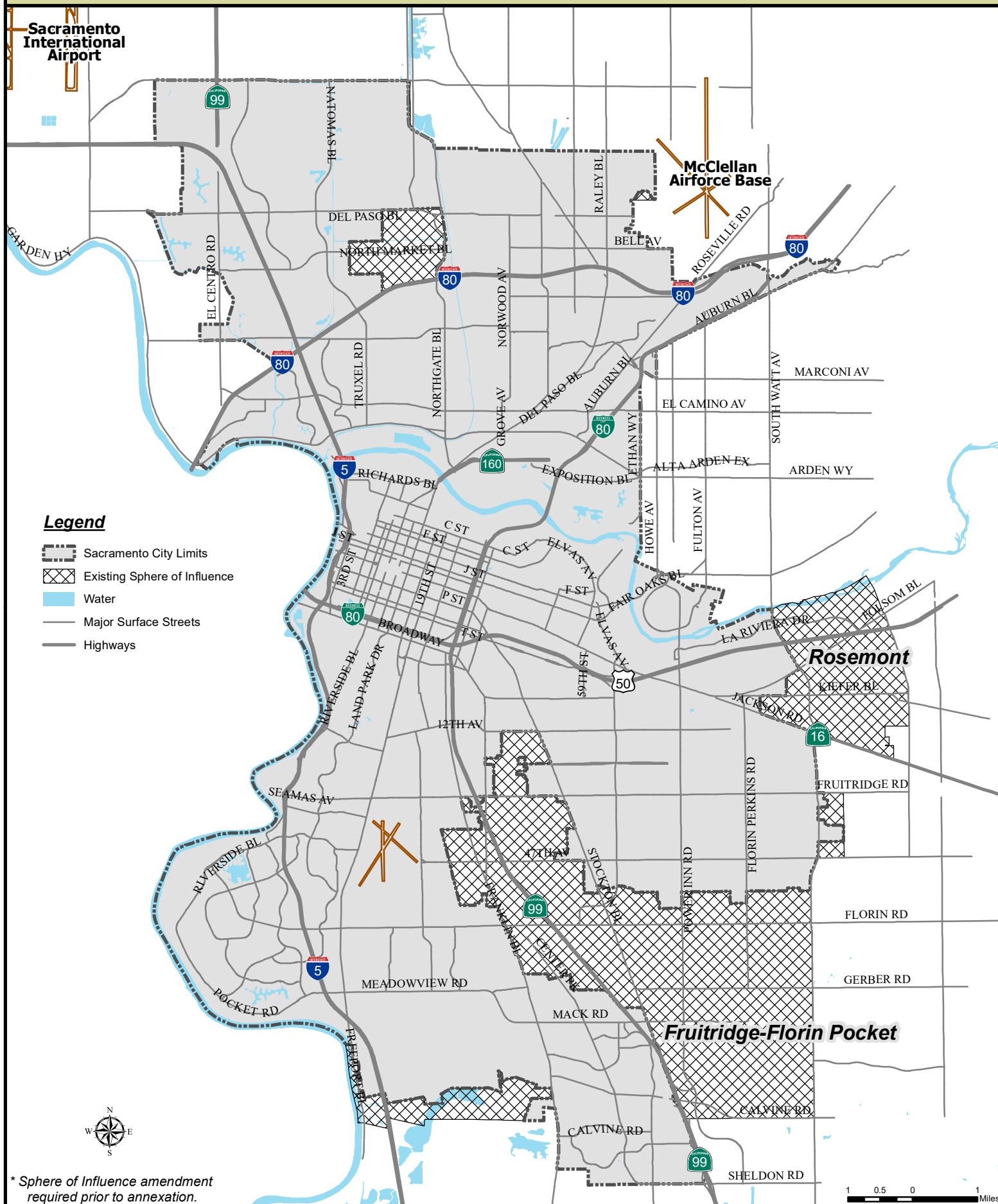
Sincerely,



Kim Crawford
Environmental Services Specialist
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817

cc: Entitlements

City of
SACRAMENTO
Community Development



October 15, 2024

Sacramento County,
Department of Community Development, Planning and Environmental Review Division
Attention: Environmental Coordinator
827 7th Street, Room 225
Sacramento, CA 95814

Subject: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WEST JACKSON HIGHWAY MASTER PLAN (PLNP2008-00240).

Dear Environmental Coordinator,

On July 25, 2024, Sacramento County released the Draft Environmental Impact Report (DEIR) for the West Jackson Highway Master Plan (WJHMP). The proposed WJHMP would include development of approximately 5,913 acres located adjacent to the eastern limits of the City of Sacramento and the southern boundary of Mather Airport, in unincorporated Sacramento County. The proposal includes the addition of 16,484 dwelling units (approximately 45,661 population) and over 13.5 million square feet of commercial, office, industrial and mixed-use space. The project plan includes development consisting of residential, commercial, industrial, employment, mixed-use, schools, parks, open space, and urban farms.

The City's comments below are preliminary in nature and respond specifically to the information presented and scope of analysis proposed in the DEIR. The Planning Division of the Community Development Department presents the comments below as a single letter representing multiple City departments.

NOP Recirculation

The City of Sacramento notes significant differences between the project description in the April 26, 2017, Revised Notice of Preparation (NOP) and the current Draft Environmental Impact Report (DEIR). These changes include substantial modifications to land use allocations, new land use categories, and the removal of others. For example, the April 2017 NOP identified 14,763 dwelling units yet the Draft EIR identifies 16,484 which is an increase of 1,721 residential dwelling units.

300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Help Line: 916-264-5011
CityofSacramento.org/cdd

Given these substantial changes, we question whether the original NOP still meets the requirement in CEQA Guidelines Section 15082(a)(1) to provide “sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response.” We acknowledge that our DEIR comments are not being provided during the 45-day public review period window, however, considering the NOP was not recirculated for the revised project and the volume of documentation including supporting studies to review, we request that the County accept our comments and respond to them accordingly.

City Boundary and Sphere of Influence

The exhibits for the DEIR appear to be inconsistent as to identification of the City’s boundary along S. Watt Avenue in the area of Aspen 1 – New Brighton. In 2018, the annexation of approximately 29 acres located south of the Jackson Highway, west of South Watt Avenue and north of Fruitridge Avenue was completed and the area is now within the City’s jurisdiction. For example, Figure 2-3 of the DEIR incorrectly shows the city boundary as not including the area that was annexed in 2018. We request that the Final EIR reflect the correct boundary.

The WJHMP includes an area designated as Future Planning Area A (FPA A) which is within the City’s existing Sphere of Influence (SOI) boundaries (see attached map). We request that this area not be designated as FPA A and be removed from the proposed WJHMP. This area, located south of Fruitridge Road, north of 47th/Elder Creek Road between Watt Avenue and Hedge Avenue. The WJHMP proposes 662 housing units for this area, which may not align with the City’s General Plan and future intentions for this area.

We note that the Draft EIR states on page 6-18 that the “Future Planning Areas” for the master plan are likely beyond the 30-year horizon. Given this extended timeline and the area’s inclusion in the City’s SOI, we request that FPA A be removed from the WJHMP plan area. The Draft EIR does not address the SOI area including assurance that any proposed land uses in this area are consistent with the City’s General Plan and long-term vision for this area. The County did not conduct any coordination directly with City staff to discuss the inclusion of our SOI area in the WJHMP. If the County continues to retain the SOI area as part of the WJHMP, we request that County staff meet with City’s Community Development Department Planning Director and New Growth Manager

prior to advancing the WJHMP any further. This is an issue that we request be resolved prior to the County taking any further actions on the WJHMP.

Water

The DEIR and the WJHMP Water Supply Assessment references an agreement with the City of Sacramento for water purchases. We request a more detailed discussion in the Final EIR regarding how the WJHMP might affect this agreement and the SCWA/City agreement, particularly during dry years when the supply from the city is reduced from 1,576 MG to 403 MG annually. This analysis should consider potential impacts on the City's ability to meet its own water supply needs during such periods.

The Draft EIR does not address whether the relied upon water agreements between Cal Am, SCWA and the City of Sacramento will require amendment to accommodate the projected development of the WJHMP. The City of Sacramento was not requested to provide a Water Supply Assessment for the proposed WJHMP. The DEIR (page 20-5) identifies that in the long term the water demands for the project will be met by SCWA's conjunctive use program and the DEIR provides a listing of water rights and contracts. The list includes several City of Sacramento cited contracts that would not necessarily provide for the WJHMP. For example, the list includes the "2004 Agreement with the City of Sacramento for Wholesaling and/or Wheeling Water Service for Sacramento International Airport and Metro Air Park". The 2004 Agreement does not provide for the WJHMP area. The DEIR does not specify whether any of the listed contracts would need be amended or if new contracts would be necessitated in order to meet the long-term water supply needs of the project.

Portions of the WJHMP area are located within the City of Sacramento's American River Place of Use (POU) boundary. The WJHMP Water Supply Assessment page 12 states "The source of POU water supply is wholesale water from the City of Sacramento to serve the area that lies within the POU. Delivery of this water to SCWA has been included in the City of Sacramento's long-range plan for perfecting their American River water rights. The diversion location, timing, and volume of delivery are currently under negotiation". While the City of Sacramento's long-range plans have considered estimated volumes of water supply from the POU for the WJHMP, City staff is unaware of any pending negotiations specific to providing a water supply source that would contribute to the future development of WJHMP.

The DEIR indicates that the project's water supply can initially be met by use of the groundwater basin. It is not clear what is projected for reliance on the groundwater basin and for what length of time and whether appropriate consultation with the local Groundwater Sustainability Agency has occurred. Also, the DEIR does not address treatment of the groundwater to remove containments so that it could be a water supply source.

The Final EIR needs to address full infrastructure needs including expansion of water transmission lines, water treatment and phasing of improvements.

Transportation

The City of Sacramento provided comments on June 22, 2017, in response to the April 25, 2017 Revised Notice of Preparation (NOP) for the WJHMP in addition to our comment letter dated October 9, 2013 for the initial NOP dated September 10, 2013. Appendix A of the DEIR includes the NOP along with public comments received by the County. The City's comments include a request to be notified of any changes in the development. The project as described in the DEIR is significantly different than the NOP notification. The DEIR does not address the two separate NOP comment letters that the City of Sacramento submitted on October 9, 2013, and June 22, 2017. City staff requested that the City's General Plan policies and goals should be considered when analyzing City facilities. We request that the Final EIR address our 2013 and 2017 NOP comments.

The DEIR (Page 19-27) identifies that the intersection of S. Watt Avenue and Jackson Highway would include grade separation. There is an existing transportation agreement (Attachment A) between the County and the City specifically addressing this intersection (Aspen 1 Project Agreement for South Watt Avenue and Jackson Highway Improvements Between the County of Sacramento and City of Sacramento dated May 22, 2018). The agreement acknowledges that the intersection rights of way at South Watt Avenue and Jackson Highway will need to be expanded to accommodate the At-Grade Improvement, preserve the Grade Separated Option, and construct the ultimate transportation improvements along these roadways as approved by both City and County in the future. The DEIR appears to be solely focused on improvements at this intersection that call for grade separations. Is the WJHMP necessitating the grade separation and if so, is the WJHMP providing those improvements? The FEIR needs to

clarify the improvements at this intersection consistent with approved transportation agreement and that these improvements are subject to both County and City approval.

Attachment B of this letter provides our requested modification to Draft EIR transportation mitigation measure TR-4B to be consistent with the approved existing May 22, 2018, agreement.

Please see our additional transportation related comments provided below under General Land Use Comments/SACOG Compatibility.

General Land use Comments / SACOG Compatibility

The Draft EIR does not adequately address potential inconsistencies between the proposed West Jackson Highway Master Plan (WJHMP) and the SACOG Metropolitan Transportation Plan (MTP)/Sustainable Communities Strategy (SCS). Specifically, the planned widenings of South Watt Avenue (between Kiefer Boulevard and Jackson Highway) and Elder Creek Road (between Florin Perkins Road and South Watt Avenue) are not included in the current MTP/SCS. This discrepancy raises concerns about the feasibility of necessary transportation improvements to support the WJHMP's proposed development.

The Final EIR should:

- Clarify whether the WJHMP assumes or requires these road widenings.
- Assess traffic impacts with and without these improvements.
- Analyze potential consequences if these improvements cannot be implemented due to lack of SACOG approval and funding.
- Propose mitigation measures or alternative strategies to address potential transportation deficiencies if the planned widenings cannot proceed.

The DEIR proposes a land use plan that, while incorporating some smart growth principles, may not fully align with the SACOG Blueprint's vision for the area. We acknowledge the plan's efforts to create a mixed-use community with varied housing types, employment centers, and an extensive trail network. However, we have the following concerns:

- The plan allocates 59.3% of residential units (9,774 out of 16,484 total units) to Low Density Residential use (Table 2-1, p. 2-30). While we recognize the need for diverse housing options, we encourage a reassessment of this distribution to potentially increase the proportion of medium and high-density housing, particularly along South Watt Avenue and near major transit corridors. This could improve access to the Watt/Manlove light rail station, further reduce vehicle miles traveled (VMT), and better align with regional compact development goals. The DEIR notes that the plan area is near the Watt/Manlove Transit Priority Area (p. 2-49) and increasing density along South Watt Avenue could capitalize on this proximity.
- The DEIR acknowledges that only approximately 69 acres of the 5,913-acre plan area are currently within the Urban Policy Area (UPA) (p. 2-21). The scale of this UPA expansion warrants further examination. We request a more detailed analysis of how this significant UPA expansion aligns with SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) projections for the area, given that the full extent of master plan development is not included in SACOG's current growth projections.

ASPEN 8/9 Expansion Area Concerns

Figure 15-1 'Active Mining Sites in Plan Area' designates the southernmost portion of the project area as Aspen IX. This area overlaps with the proposed Aspen IX Expansion Area outlined in the Notice of Preparation of a Draft Supplemental Environmental Impact Report for Sacramento County Teichert Aspen VIII & IX Use Permit Amendment Project (PLNP2024-00068). The DEIR does not address this proposed mining expansion, which could significantly impact the implementation timeline and environmental conditions of the WJHMP. The Final EIR should:

- Acknowledge and discuss the proposed Aspen IX mining expansion and its potential impacts on the WJHMP implementation.
- Reassess its assumptions about mineral resource extraction and reclamation timelines considering this new information. The mining expansion proposes operations until 2046 with reclamation completed by 2048, which could conflict with the WJHMP's assumed development timeline of 2025-2055.

- Evaluate how the extended mining operations might affect the proposed land uses, particularly residential and open space areas planned for the Aspen IX region.
- Address compliance with the Surface Mining and Reclamation Act (SMARA), especially regarding the transition from mining operations to the proposed development. The EIR should explain how the reclamation process in the expansion areas will align with the WJHMP's development plans.

As this project progresses through master planning, environmental review, and engineering, we request the County's continued coordination and that we receive all WJHMP public notifications including those for any future public meetings and hearings. If you have follow-up questions or seek clarifications on any of the above issues, please contact Cheryle Hodge at chodge@cityofsacramento.org or 808-5971.

Sincerely,

Cheryle L. Hodge

Cheryle Hodge
New Growth Manager, Community Development Department

Cc: Tom Pace, Director, Community Development Dept., City of Sacramento
Greg Sandlund, Planning Director, Community Development Dept.
Matt Eierman, Director, Department of Public Works
Lucinda Willcox, Assistant Director, Dept. of Public Works,
Jennifer Donlon Wyant, Transportation Planning Manager, Dept. of Public Works
Pravani Vandeyar, Director, Department of Utilities
Brett Ewart, Supervising Engineer, Department of Utilities
Pelle Clarke, Senior Engineer, Department of Public Works
Tom Bufford, Principal Planner, Environmental Planning Services
Scott Johnson, Senior Planner, Environmental Planning Services

ASPEN 1 PROJECT AGREEMENT FOR SOUTH WATT AVENUE AND JACKSON HIGHWAY IMPROVEMENTS

This PROJECT AGREEMENT ("Agreement") is made as of May 22nd, 2018 by and between the COUNTY OF SACRAMENTO, a political subdivision of the State of California, ("COUNTY") and the CITY OF SACRAMENTO, a municipal corporation, ("CITY"). COUNTY and CITY may be referred to individually as "Party" and collectively as "Parties."

Background

A. On April 1, 2009, the Sacramento Local Agency Formation Commission ("LAFCO") adopted Resolution No. 2009-02-0401-05-08 approving the CITY's requested sphere of influence amendment (the "SOI Amendment") to include approximately 29 acres south of Jackson Highway (State Route 16) and west of South Watt Avenue located in the unincorporated portion of County of Sacramento (the "Property"). The 232.3 acre master planned residential development known as the Aspen 1 – New Brighton Project ("Project") includes the Property located within the SOI Amendment.

B. As a condition of approval of the SOI Amendment, LAFCO required CITY and COUNTY to "prepare a plan to address the necessary improvements to the local roadway network of each jurisdiction to mitigate the impacts associated with development within the SOI Amendment area as well as accommodate the regional mobility needs associated with anticipated growth envisioned in the Sacramento County General Plan update" (the "Plan").

C. LAFCO required that the Plan, to be submitted with CITY's annexation application for the Property, include: (1) a list of improvements, description of the responsible jurisdiction, phasing plan, and a clearly defined financing mechanism; (2) consider COUNTY's proposal for an urban interchange at South Watt Avenue and Jackson Highway; and (3) accommodating a bus rapid transit system on South Watt Avenue and Jackson Highway.

D. On November 24, 2015, CITY adopted Resolution No. 2015-0360 certifying a final environmental impact report ("EIR") for the Project, a portion of which is proposed to be developed on the Property. The Project will have a mix of residential, commercial, and agricultural development, including up to 1,365 residential units, a mixed-use village center, a traditional shopping center, and an urban farm of approximately 27 acres. The Project also will include amenities such as parks, open space, pedestrian and bicycle paths, a school site, and a community gathering center.

E. Stonebridge Properties, LLC (the "Project Applicant") is required to comply with the following EIR mitigation measures to address Project traffic impacts:

- Mitigation Measures 5.10-1(b), which requires the property owner to dedicate right of way for two eastbound lanes through the intersection of South Watt Avenue and Jackson Highway. The eastbound approach shall consist of a left turn lane, two through lanes, and a right turn lane. These improvements are to be



implemented when 90% of the development is built as measured by the p.m. peak hour trip generation.

2 cont

- Mitigation Measure 5.10-2, which requires the widening of South Watt Avenue from Jackson Highway to Fruitridge Road to four through travel lanes. This improvement is to be implemented when 20% of the development is built as measured by daily trip generation.
- Mitigation Measure 5.10-8, which requires coordination with Sacramento Regional Transit District (“RT”) to provide transit facilities along Jackson Highway and/or South Watt Avenue to serve the Project. The reference to “transit facilities” includes the bus rapid transit system.
- Mitigation Measure 5.10-20(a), which requires that the Project Applicant contribute a fair share “to the implementation of the high capacity intersection” at South Watt Avenue and Jackson Highway.

F. On November 24, 2015, CITY also adopted Resolution No. 2015-0366 to approve Project entitlements consisting of a Tentative Master Subdivision Map (the “Map”) and a Site Plan Design Review. The Map conditions under section C-11 included dedication of rights of way for South Watt Avenue to be a 6-lane arterial roadway (121 feet), for Jackson Highway to be a 4-lane arterial roadway (99 feet), and additional dedications at signalized intersections and driveways to accommodate turn lanes and expanded intersections, including the South Watt Avenue and Jackson Highway intersection.

G. It has been determined by CITY and COUNTY that with the planned expansion of South Watt Avenue and Jackson Highway, there will be sufficient room within the roadways to accommodate a bus rapid transit system if RT desires to develop such a facility.

H. COUNTY has prepared a corridor study entitled “State Route 16 (Jackson Road) Corridor Study” and a preliminary engineering plan exhibit entitled the “State Route 16/Jackson Highway Corridor Study, Jackson Highway to South Watt Avenue Westbound Right-turn Lane Tunnel” dated July 6, 2012 (the “Intersection Study”). To accommodate the future travel demand at the intersection of South Watt Avenue and Jackson Highway, the Intersection Study proposed a grade separated tunnel at an estimated total cost of \$35 million (the “Grade Separated Option”). The Grade Separated Option will accommodate the existing and future high travel demand for the Jackson Highway westbound to northbound South Watt Avenue with a right-turn movement that is free-flowing and grade separated from other conflicting travel movements, including bicycle and pedestrian travel, and will result in a smaller intersection footprint. The Grade Separated Option’s geometric layout is depicted in Exhibit A.

- I. CITY and COUNTY agree that additional, future analysis of the traffic operations, travel movements, and delays associated with the South Watt Avenue and Jackson Highway intersection may be warranted and result in modifications to the Grade Separated Option. CITY and COUNTY agree to collaborate and coordinate on

future analysis of the intersection operations and recommended transportation improvements.

J. Given that the existing Jackson Highway and South Watt Avenue intersection configuration is already near capacity, CITY and COUNTY agree that an at-grade intersection improvement with an estimated cost of \$5 million should be constructed in the short term (the “At-Grade Improvement”), while CITY and COUNTY continue to evaluate and analyze the ultimate transportation improvements for South Watt Avenue and Jackson Highway, including the future intersection geometry. The At-Grade Improvement, to be constructed in the short-term, shall consist of the following:

- Northbound approach lanes: two left-turn lanes, three through lanes, a bicycle lane, one right-turn lane.
- Southbound approach lanes: three left-turn lanes (of which one lane is striped out), three through lanes, a bicycle lane, one right-turn lane.
- Eastbound approach lanes: two left-turn lanes, two through lanes, a bicycle lane, one right-turn lane, plus a reservation of land to accommodate the future expansion of a third through lane.
- Westbound approach lanes: two left-turn lanes, two through lanes, a bicycle lane, one right-turn lane, plus a reservation of land to accommodate the future expansion of a third through lane and consideration for a second right-turn lane.

K. The intersection rights of way at South Watt Avenue and Jackson Highway will need to be expanded to accommodate the At-Grade Improvement, preserve the Grade Separated Option, and construct the ultimate transportation improvements along these roadways as approved by both CITY and COUNTY in the future. COUNTY and CITY have reviewed and approved the geometric layout for the At-Grade Improvement portion contained in the right of way plan prepared by Wood Rogers dated March 14, 2018, and attached as Exhibit B.

L. COUNTY has contracted with DKS to prepare a traffic study for the southeastern portion of the county to project future traffic levels and identify the transportation improvements that may be needed to accommodate planned growth. From the DKS study, the percentage of trips generated from the Project as compared to the total traffic levels projected to use the expanded South Watt Avenue and Jackson Highway intersection can be determined to establish the fair share contribution owed by the Project Applicant to meet the CITY’s conditions of approval for the Project. Over time, as the design for such expansion is refined, cost estimates updated, and new traffic studies are prepared, the Project’s fair share contribution may change.

M. On February 14, 2017, CITY adopted a Citywide Transportation Development Impact Fee (TDIF) which included the costs to widen South Watt Avenue and realign Jackson Highway within the city limits. Once the Property is annexed into the city and CITY updates the nexus study, the TDIF can be revised to include the cost to widen South Watt Avenue within the SOI Amendment area.

N. CITY and COUNTY desire to enter into this Agreement to: (1) identify the transportation improvements required for the SOI Amendment Property that are to be constructed by CITY or COUNTY; (2) confirm that the Project Applicant will dedicate sufficient rights of way to accommodate expansion of the South Watt Avenue and Jackson Highway intersection; and (3) confirm that the Project Applicant will pay its fair share for the costs of such expansion and related roadway improvements.

Agreement

NOW, THEREFORE, CITY and COUNTY agree as follows:

Section 1. Background. The information in the Background is true and correct and made a part of this Agreement.

Section 2. Purpose. The purpose of this Agreement is to establish the Plan required by LAFCO for annexation of the Property and implement the Project entitlements.

Section 3. Transportation Improvements. CITY and COUNTY agree that the "Transportation Improvements" required for the Property to be annexed into the city are as follows:

- South Watt Avenue expansion to be a 6-lane arterial roadway.
- Jackson Highway expansion to be a 4-lane arterial roadway.
- Implementation of the At-Grade Improvement and the ultimate roadway and intersection improvements approved by CITY and COUNTY for South Watt Avenue and Jackson Highway in the future.

Section 4. Right of Way Dedication. CITY commits that it will implement the Map conditions by requiring the Project Applicant to either dedicate or include an irrevocable offer of dedication on each final subdivision map for the necessary rights of way, as determined by the Project Applicant's engineer and approved by the Parties, for the Transportation Improvements as delineated in Exhibits A and B. The Parties agree that as roadway and intersection improvement plans change in the future with more refined engineering studies, the area required to be dedicated by the Project Applicant may be larger or smaller than what is shown in Exhibits A and B. As each final subdivision map is processed for approval, CITY will require the right of way dedication or offer of dedication based on the most recent intersection improvement plan approved by both Parties.

Section 5. Fair Share Contribution. The estimated cost for the At-Grade Improvement is \$5 million. Based on the DKS study of future traffic levels at the intersection of South Watt Avenue and Jackson Highway as compared to the traffic generated by the Project, the Project will contribute 6.2 % of the total trip estimates. Therefore, the total fair share contribution owed by the Project Applicant for the At-Grade Improvement is \$ 310,000.00. This amount is to be paid at the time of issuance of the building permits for the Project in the amounts set forth in Exhibit C. CITY will impose these impact fees and set-aside the funds to pay a portion of the costs of the At-Grade Improvement. As the cost for the At-Grade Improvement is updated based on engineering plans, and the COUNTY updates the traffic study for the southeastern

portion of the county, the Project's fair share contribution and the amount of the impact fees may change. In the future, CITY will impose impact fees for the expanded South Watt Avenue and Jackson Highway intersection based on the most recent improvement plan approved by both Parties and in compliance with the Mitigation Fee Act.

Section 6. Financing the Transportation Improvements. CITY and COUNTY agree that funding to construct the Transportation Improvements will likely require federal, state and local resources, in addition to development impact fees. CITY and COUNTY agree to cooperate in identifying and applying for funding needed to undertake interim and long-term improvements to South Watt Avenue and Jackson Highway, as such improvements are approved by both Parties to address traffic congestion.

Section 7. Construction of the Transportation Improvements. CITY and COUNTY agree that the timing for constructing the Transportation Improvements will depend on when development occurs in the southeastern portion of the county. Because portions of South Watt Avenue and Jackson Highway are located within the city and county, the Parties will mutually determine which entity should take the lead in overseeing construction of each Transportation Improvement, or a portion thereof, and how much of the impact fees collected should be allocated to the other entity for the work. Allocation of funds held by the CITY or COUNTY shall be set forth in separate project-specific agreements.

Section 8. Modification. The provisions of this Agreement may be modified only by a formal written amendment or per the terms of a project agreement duly authorized and executed by both Parties.

Section 9. Duplicate Counterparts. This Agreement may be executed in duplicate counterparts and shall be deemed executed when signed by both Parties.

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be duly executed as of the day and year first written above.

CITY OF SACRAMENTO

COUNTY OF SACRAMENTO

By: Hector Barron
Hector Barron
Public Works Director

By: Ron E. Vicari
Ron E. Vicari
Director, Department of Transportation

APPROVED AS TO FORM:

APPROVED AS TO FORM:

By: Angela A. [Signature]
Senior Deputy City Attorney

By: [Signature]
Deputy County Counsel

Attested on: _____ (date)

5

Wendy Klock-Johnson
Wendy Klock-Johnson, Assistant City Clerk

ATTEST:

By: _____
Assistant City Clerk

ACKNOWLEDGMENT:

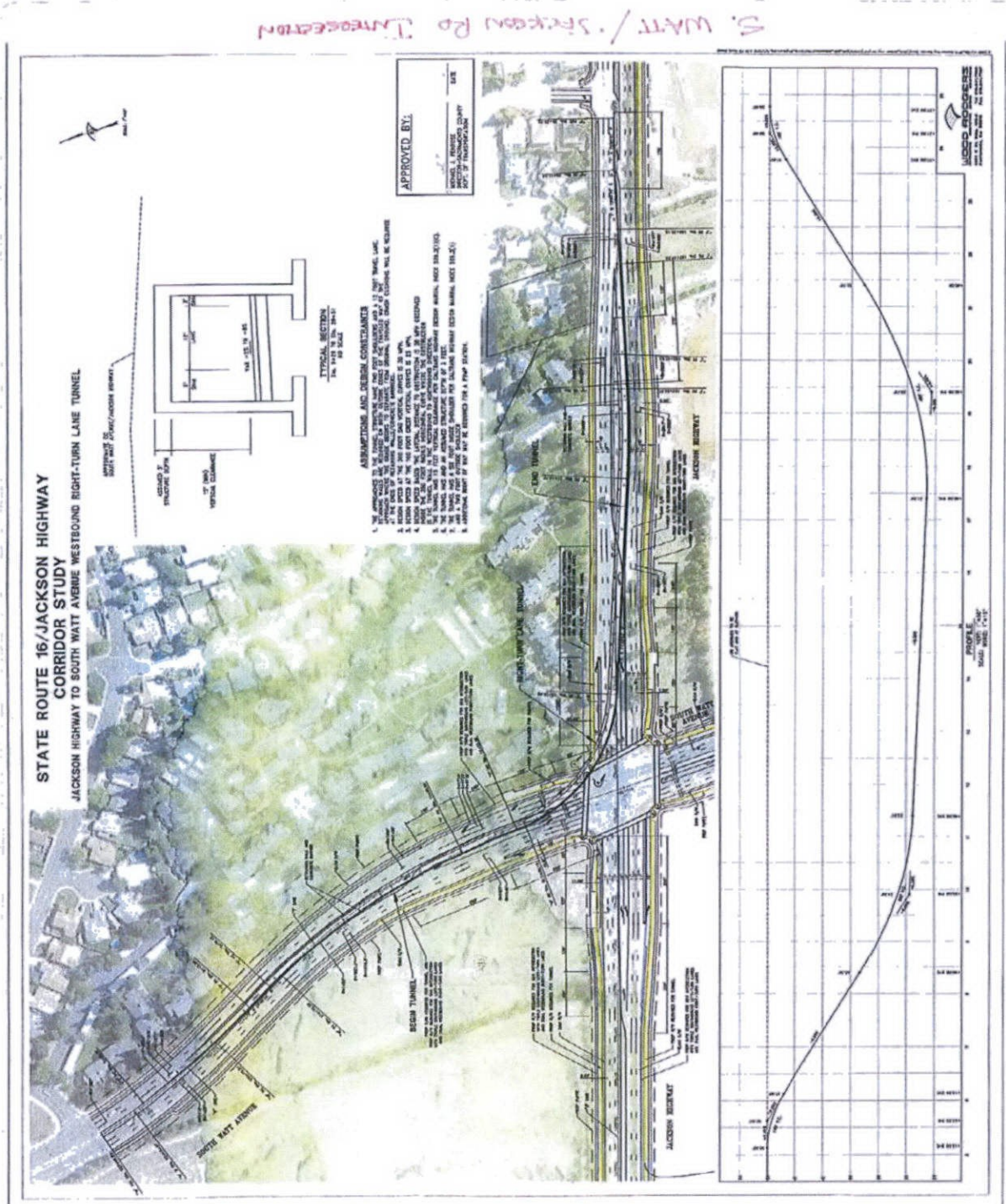
On behalf of Stonebridge Properties, LLC, the Project Applicant acknowledges that it will be subject to compliance with the foregoing obligations to dedicate rights of way and pay fair share impact fees for the Transportation Improvements as a condition of approval of the final maps and building permits issued by CITY for the Project.

STONEBRIDGE PROPERTIES, LLC

By: 
Randall W. Sater

Exhibit A

SOUTH WATT AVENUE AND JACKSON HIGHWAY INTERSECTION GRADE SEPARATED OPTION



SOUTH WATT AVENUE AND JACKSON HIGHWAY INTERSECTION RIGHT OF WAY PLAN



Exhibit C

ASPEN 1 - AT GRADE IMPROVEMENT FAIR SHARE FEES

Table 1
City of Sacramento Aspen 1
Estimated Jackson Road/South Watt Road Improvements Cost Allocation

Expanded Intersection

Land Use	Net Acres	Density	Units/Sq.Ft.	Cost Allocation				
				DUE Factor	Total DUE	Distribution	Allocated Cost	Cost per Unit or Sq. Ft.
LDR	59.10	8.2	482	1.00	482	41.15%	\$127,567	\$264.66
HDR	15.10	25.0	378	0.61	231	19.69%	\$61,026	\$161.44
Res. Mixed Use	13.50	30.0	405	0.61	247	21.09%	\$65,384	\$161.44
Nonres. Mixed Use	see above	n/a	59,000	1.12	66	5.64%	\$17,489	\$0.30
Commercial	10.80	0.3	130,000	1.12	146	12.43%	\$38,535	\$0.30
Total					1,171	100.00%	\$310,000	

alloc

Source: County of Sacramento SCTDF and Stonebridge Properties

MITIGATION MEASURE TR-4B: ROADWAY DESIGN IMPROVEMENTS If the County determines, through application of the Dynamic Implementation Tool or similar means, that any subsequent entitlement would result in roadway design deficiencies, the applicant shall be required to construct or fund the improvement. Required physical roadway modifications will include the following improvements proposed in the Local Traffic Study, as determined appropriate by the County: 19 -- Transportation WJHMP Draft EIR 19-27 PLNP2008-00240

- **Watt Avenue and Folsom Boulevard:** Configuration involving grade separation of the northbound and southbound through movements of Watt Avenue. Access to and from Folsom Boulevard would be accomplished via on and off ramps from the left lanes of Watt Avenue to a single signalized intersection. A bus rapid transit lane along Watt Avenue would also intersect Folsom Boulevard at the traffic signal.
- **Watt Avenue and Kiefer Boulevard:** The ultimate improvement would involve a tight diamond interchange. The through movements (and bus rapid transit lane) on Watt Avenue would be grade separated from Kiefer Boulevard. Access to and from Kiefer Boulevard would be accomplished via on and off-ramps at two signalized intersections along Kiefer Boulevard.
- **Watt Avenue and Jackson Road:** The responsible project applicant(s), County and City of Sacramento shall work in coordination per the County and City transportation agreement dated May 22, 2018, to implement improvements to the Watt Avenue and Jackson Road intersection. The intersection rights of way at South Watt Avenue and Jackson Highway will need to be expanded to accommodate the At-Grade Improvement, preserve the Grade Separated Option, and construct the ultimate transportation improvements along these roadways as approved by both CITY and COUNTY in the future. COUNTY and CITY have reviewed and approved the geometric layout for the At-Grade Improvement portion contained in the right of way plan prepared by Wood Rogers dated March 14, 2018, and attached as Exhibit B of the May 22, 2018, transportation agreement.

Improvements for Grade Separation identified for the WJHMP by the County would include the implementation of a standard six-by-six signalized intersection (two left-turn lanes, three through lanes, and one right-turn lane, on each approach) with three modifications.

- The southbound left-turn movement would be grade separated;
 - The westbound right-turn movement would be grade separated; and
 - Three northbound left-turn lanes.
- **Bradshaw Road and Jackson Road:** Improvements would involve grade separating the northbound and southbound through movements.
 - Grant Line Road and Prairie City Road, White Rock Road, Douglas Road, Kiefer Boulevard, Jackson Road, and Sunrise Boulevard: Implementation of grade separated intersections.

Each of these intersections have unique travel movements, volumes and existing context sensitive conditions (potential environmental issues, right-of-way, physical constraints), and the special treatments utilized at each location shall be studied to select the treatments that address the operational deficiency as it relates to safety, while avoiding or minimizing other operational or environmental implications. Other equivalent treatments may be selected to the satisfaction of the Department of Transportation to mitigate safety impacts.



ADAM A. HOUSE
Fire Chief

Sacramento Metropolitan Fire District

10545 Armstrong Ave., Suite 200 • Mather, CA 95655 • Phone (916) 859-4300 • Fax (916) 859-3702

October 18, 2024

SENT VIA EMAIL

Sacramento County
Department of Community Development
Planning and Environmental Review Division
Attn: Environmental Coordinator
827 7th Street, Room 225
Sacramento, CA 95814

Subject: West Jackson Highway Draft Environmental Impact Report (EIR) Comments

To Whom It May Concern:

The Sacramento Metropolitan Fire District (District) has reviewed the West Jackson Highway Draft EIR and has the following comments:

1. As a result of the District's 2023 Standards of Cover study, revised emergency response standards were adopted in December 2023 which differentiated levels of service to be provided based on population densities and perceived risk (Resolution 2023-079), in accordance with recommended best practices of the Center for Public Safety Excellence and the National Fire Protection Association. The EIR should be updated to reference the District's revised response standards and service levels objectives adopted in 2023.
2. Based on the District's growth analysis conducted as part of the 2023 Standards of Cover, the West Jackson Highway Master Plan will require a dense urban level of service at full buildout (Page 288, 2023 Standards of Cover), in accordance with the District's response standards. Per the District's adopted service level objectives, a first-due travel time of four (4) minutes is required for dense urban response, with a total first-due response time of seven (7) minutes (including dispatch and turnout time). The EIR should be updated to reference a dense urban level of service required for the plan area.
3. The growth plan outlined in the 2023 Standards of Cover identified the need for **three (3) additional fire stations** to serve the West Jackson Highway Master Plan area (Page 290, 2023 Standards of Cover), which is consistent with the District's prior comments on the West Jackson Highway Master Plan dated August 28, 2019 (West Jackson Highway Master Plan Comment Letter). The EIR should be updated to reflect three (3) fire stations necessary to serve the plan area.

4. The approximate locations of the future stations (WJ-01, WJ-02, WJ-03) are shown in the map of proposed station locations on page 290 of the 2023 Standards of Cover and are consistent with the locations identified in the District's prior comments provided in 2019 for the West Jackson Highway Master Plan. Advisory only - no action needed.
5. The anticipated station sizing requirements for the future stations are outlined in the District's 2021 Capital Facilities Fee Study (page 35) and the growth plan in the 2023 Standards of Cover (page 290), and are shown below. Advisory only – no action needed.

Station	Bays/Dorms	Square Footage
Future WJ-01 (formerly Future 11)	4:13	16,763
Future WJ-02 (formerly Future 9)	4:13	16,763
Future WJ-03 (formerly Future 16)	3:10	13,638

6. The District's standardized fire station site requirements are attached hereto (Site Requirements for Metro Fire Stations, 2021). Advisory only – no action needed.

For your reference, the 2023 Standards of Cover study can be accessed here:

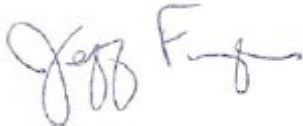
<https://metrofire.ca.gov/files/b2e597efe/Standards+of+Cover+Study.pdf>

For your reference, the 2021 Capital Facilities Fee Study can be accessed here:

<https://metrofire.ca.gov/files/e487b24ed/Metro+Fire+Capital+Facilities+Impact+Fee+Study.pdf>

If you have any questions, please contact me by phone at (916) 859-4517 or by email at frye.jeff@metrofire.ca.gov.

Sincerely,



Jeff Frye
Chief Development Officer

Attachments: Resolution 2023-079 Response Standards and Service Level Objectives
West Jackson Highway Master Plan Comment Letter (August 28, 2019)
Site Requirements for Metro Fire Stations



Sacramento Metropolitan Fire District

10545 Armstrong Ave., Suite 200, Mather, CA Phone (916) 859-4300 Fax (916) 859-3700

ADAM A. HOUSE
Fire Chief

RESOLUTION NO. 2023-079

A RESOLUTION OF THE SACRAMENTO METROPOLITAN FIRE DISTRICT TO ADOPT RESPONSE STANDARDS AND SERVICE LEVEL OBJECTIVES

WHEREAS, the Sacramento Metropolitan Fire District (District) recently completed its inaugural Standards of Cover (SOC) report to evaluate District service delivery; and

WHEREAS, the SOC Policy (Board Policy 01.021.01) memorializes SOC elements, annual development and updates, key performance metrics, and updated response standards and service level objectives; and

WHEREAS, the District shall adopt response standards, service level objectives, and key performance metrics in order to measure performance and desired outcomes per Section 2a of the SOC Policy; and

WHEREAS, the proposed Response Standards and Service Level Objectives enhance the District's ability to evaluate diverse, evolving risks in consideration of best practice recommendations; and

WHEREAS, adoption of the Response Standards and Service Level Objectives is crucial to improving the District's service delivery.

NOW THEREFORE BE IT RESOLVED that the Board of Directors of the Sacramento Metropolitan Fire District does hereby adopt the Response Standards and Service Level Objectives.

PASSED, APPROVED AND ADOPTED this 14th day of December, 2023. I, **MARNI RITTBURG, BOARD CLERK OF SACRAMENTO METROPOLITAN FIRE DISTRICT** HEREBY **CERTIFY** the foregoing Resolution was introduced and passed at a regular meeting of the Sacramento Metropolitan Fire District Board by the following roll call vote:

AYES: President Clark, Directors Costa, Goold, Jones, Rice, Saylor, Sheetz, Webber and Wood
NOES: None
ABSENT: None
ABSTAIN: None

SACRAMENTO METROPOLITAN FIRE DISTRICT

By: 
President, Board of Directors

ATTEST:


Marni J. Rittburg, CMC, CPMC
Clerk of the Board



Sacramento Metropolitan Fire District

Response Standards and Service Level Objectives

Response Standard Considerations

Response standards determine the appropriate level of service to be provided to the community by the Sacramento Metropolitan Fire District (District). Service level can be described as the expected response time and the resources required to perform the critical tasks necessary to effectively mitigate the incident. Service levels can vary based on population, density, land use, incident history, identified risks and special hazards.

Proposed Response Standards

The District recommends the following response standards to guide service level, which are considered best practices by the Center for Public Safety Excellence and the National Fire Protection Association (NFPA).

Dense Urban	Urban	Suburban	Rural
Population density greater than 3,000 people per square mile	Population density between 1,000-3,000 people per square mile	Populations density between 500-1,000 people per square mile	Population density less than 500 people per square mile

In addition to the above four standards, development trends suggest that there may be pockets in dense urban areas that eventually exceed 10,000 people per square mile as buildout occurs. Recognizing that densities at that level poses additional risks and challenges to emergency response, future consideration should be made on whether to include an even higher response standard for these areas which would be considered “metropolitan” in nature.

Service Level Objective Considerations

As previously defined, service level is described as the expected response time and the resources required to perform the critical tasks necessary to effectively mitigate the incident. As such, considerations for setting service level objectives primarily revolve around response time considerations and risk considerations.

Response Time

Response time is measured as the length of time from when a call is dispatched to when personnel arrive on scene. Response time is measured to include both the first arriving unit as well as when effective response force (ERF) is achieved, and includes dispatch time (time from alarm to notification), turnout time (time from notification to enroute), and travel time (time from enroute to on scene).

Risk

Different types of incidents pose varying levels of risk and ERF needs, which should be considered when setting service level objectives. NFPA 1710 recommends that service level objectives are set for each major service component (fire suppression, EMS, and special operations) with consideration given to level of risk. The District recognizes fire suppression and EMS, and further breaks special operations into Technical Rescue and Hazardous Materials (HazMat) risk categories.

Proposed Service Level Objectives

As previously discussed, NFPA 1710 recommends that service level objectives be set for all incident types in accordance with risk categories.



Response Time

The recommended benchmark performance statements below reflect the District's existing objectives for a dispatch time of 01:00 (one minute) and a turnout time of 02:00 (two minutes).

Recommended travel times are shown in the table below. The recommendations retain existing objectives for first-due and ERF travel times by response standard, and add additional travel time objectives for varying risk class and category, as well as for an additional response standard (dense urban) which was not recognized in previous District Standards.

Risk Class & Category		ERF	Dispatch Time	Turnout Time	ERF Travel Time				Total Response Time			
					Dense Urban	Urban	Suburban	Rural	Dense Urban	Urban	Suburban	Rural
Fire	Low 1	3	01:00	02:00	04:00	04:00	10:00	14:00	07:00	07:00	13:00	17:00
	Low 2	4	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Low 3	7	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Low 4	8	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Moderate 1	11	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Moderate 2	13	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Moderate 3	14	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	High 1	16	01:00	02:00	10:10	10:10	19:10	25:30	13:10	13:10	22:10	28:30
	High 2	24	01:00	02:00	10:10	10:10	19:10	25:30	13:10	13:10	22:10	28:30
	High 3	27	01:00	02:00	10:10	10:10	19:10	25:30	13:10	13:10	22:10	28:30
	Max 1	32	01:00	02:00	10:10	10:10	19:10	25:30	13:10	13:10	22:10	28:30
	Max 2	33	01:00	02:00	10:10	10:10	19:10	25:30	13:10	13:10	22:10	28:30
EMS	Low 1	2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Low 2	3	01:00	02:00	04:00	04:00	10:00	14:00	07:00	07:00	13:00	17:00
	Low 3	5	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Low 4	5	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
Rescue	Low 1	3	01:00	02:00	04:00	04:00	10:00	14:00	07:00	07:00	13:00	17:00
	Low 2	5	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Low 3	7	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Moderate 1	10	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Moderate 2	13	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Moderate 3	17	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	High 1	21	01:00	02:00	10:10	10:10	19:10	25:30	13:10	13:10	22:10	28:30
	High 2	22	01:00	02:00	10:10	10:10	19:10	25:30	13:10	13:10	22:10	28:30
HazMat	Low 1	3	01:00	02:00	04:00	04:00	10:00	14:00	07:00	07:00	13:00	17:00
	Low 2	8	01:00	02:00	8:00	8:00	15:00	20:00	11:00	11:00	18:00	23:00
	Moderate 1	11	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Moderate 2	14	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	Moderate 3	21	01:00	02:00	10:10	10:10	19:10	25:30	13:10	13:10	22:10	28:30
	High 1	14	01:00	02:00	08:00	08:00	15:00	20:00	11:00	11:00	18:00	23:00
	High 2	25	01:00	02:00	10:10	10:10	19:10	25:30	13:10	13:10	22:10	28:30

Benchmark Performance Statements

Keeping in mind that each risk class and subcategory has a different ERF, individual benchmark performance statements are recommended below for each risk class and category according to applicable response standards.

Fire Response

Fire Low 1

For 90% of all Fire Low 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gallons per minute (gpm) pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, and extinguishment. Total response time for the arrival of ERF will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. ERF will be staffed with a minimum of 3 personnel.



Fire Low 2

For 90% of all Fire Low 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, and extinguishment. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 4 personnel and be capable of monitoring aircraft communications.

Fire Low 3

For 90% of all Fire Low 3 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, and extinguishment. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 7 personnel.

Fire Low 4

For 90% of all Fire Low 4 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, and extinguishment. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 8 personnel.

Fire Moderate 1

For 90% of all Fire Moderate 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm as needed. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 11 personnel.

Fire Moderate 2

For 90% of all Fire Moderate 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, and providing patient care as needed. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 13 personnel.

Fire Moderate 3

For 90% of all Fire Moderate 3 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm as needed. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 14 personnel.



Fire High 1

For 90% of all Fire High 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, and providing patient care as needed. Total response time for the arrival of ERF will be 10:10 in dense urban and urban areas; 19:10 in suburban areas; and 25:30 in rural areas. ERF will be staffed with a minimum of 16 personnel.

Fire High 2

For 90% of all Fire High 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm as needed. Total response time for the arrival of ERF will be 10:10 in dense urban and urban areas; 19:10 in suburban areas; and 25:30 in rural areas. ERF will be staffed with a minimum of 24 personnel.

Fire High 3

For 90% of all Fire High 3 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, and gaining direct access to the aircraft. Total response time for the arrival of ERF will be 10:10 in dense urban and urban areas; 19:10 in suburban areas; and 25:30 in rural areas. ERF will be staffed with a minimum of 27 personnel.

Fire Max 1

For 90% of all Fire Max 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, and establishing standpipe connection as appropriate. Total response time for the arrival of ERF will be 10:10 in dense urban and urban areas; 19:10 in suburban areas; and 25:30 in rural areas. ERF will be staffed with a minimum of 32 personnel.

Fire Max 2

For 90% of all Fire Max 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, and conducting evacuations as needed. Total response time for the arrival of ERF will be 10:10 in dense urban and urban areas; 19:10 in suburban areas; and 25:30 in rural areas. ERF will be staffed with a minimum of 33 personnel.

EMS Response**EMS Low 1**

EMS Low 1 incidents are primarily interfacility transfers and Mobile Integrated Health (MIH) program calls which, by nature, are not emergent and do not require emergency response. As such, no benchmark performance statement is recommended for adoption at this time. As the MIH program grows, a future recommendation may be considered for appropriate benchmark performance measurement.



EMS Low 2

For 90% of all EMS Low 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene safety, requesting additional resources if necessary, and providing BLS/ALS patient care as needed. Total response time for the arrival of ERF will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. ERF will be staffed with a minimum of 3 personnel.

EMS Low 3

For 90% of all EMS Low 3 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene safety, requesting additional resources if necessary, and providing BLS/ALS patient care as needed. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 5 personnel.

EMS Low 4

For 90% of all EMS Low 4 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene safety, requesting additional resources if necessary, and providing BLS/ALS patient care as needed. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 5 personnel.

Technical Rescue Response**Rescue Low 1**

For 90% of all Rescue Low 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene safety, investigation, requesting additional resources if necessary, providing BLS/ALS patient care, and mitigation as needed. Total response time for the arrival of ERF will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. ERF will be staffed with a minimum of 3 personnel.

Rescue Low 2

For 90% of all Rescue Low 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene safety, investigation, requesting additional resources if necessary, providing BLS/ALS patient care, and mitigation. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 5 personnel.

Rescue Low 3

For 90% of all Rescue Low 3 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene safety, investigation, requesting additional resources if necessary, providing BLS/ALS patient care, and mitigation. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 7 personnel.

Rescue Moderate 1

For 90% of all Rescue Moderate 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be



capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, providing BLS/ALS patient care, and conducting evacuations as needed. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 10 personnel.

Rescue Moderate 2

For 90% of all Rescue Moderate 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, gaining access to aircraft, deploying fire attack lines capable of flowing 150 gpm, and performing rescues as needed. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 13 personnel.

Rescue Moderate 3

For 90% of all Rescue Moderate 3 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene size-up, identifying victim profile and location, requesting additional resources if necessary, and performing shore-based rescues. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 17 personnel.

Rescue High 1

For 90% of all Rescue High 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene size-up, site control and scene management, hazard recognition, increasing survivability profile, and requesting additional resources if necessary. Total response time for the arrival of ERF will be 10:10 in dense urban and urban areas; 19:10 in suburban areas; and 25:30 in rural areas. ERF will be staffed with a minimum of 21 personnel.

Rescue High 2

For 90% of all Rescue High 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene size-up, site control and scene management, hazard recognition, increasing survivability profile, and requesting additional resources if necessary. Total response time for the arrival of ERF will be 10:10 in dense urban and urban areas; 19:10 in suburban areas; and 25:30 in rural areas. ERF will be staffed with a minimum of 22 personnel.

Hazardous Materials Response

HazMat Low 1

For 90% of all HazMat Low 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene size-up and safety, investigation, requesting additional resources if necessary, and mitigation if possible. Total response time for the arrival of ERF will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. ERF will be staffed with a minimum of 3 personnel.

HazMat Low 2

For 90% of all HazMat Low 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of establishing incident command, scene size-up and safety, investigation, requesting additional resources if



necessary, isolating and denying entry, evacuations, and performing first responder mitigation tactics if possible. Total response time for the arrival of ERF will be 8:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 8 personnel.

HazMat Moderate 1

For 90% of all HazMat Moderate 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, isolating and denying entry, securing utilities, and conducting evacuations or rescues as needed. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 11 personnel.

HazMat Moderate 2

For 90% of all HazMat Moderate 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, requesting additional resources if necessary, scene safety, isolating and denying entry, product identification if possible, determining immediate threats to life, and rescuing victims if possible. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 14 personnel.

HazMat Moderate 3

For 90% of all HazMat Moderate 3 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, requesting additional resources if necessary, scene safety, isolating and denying entry, product identification if possible, determining immediate threats to life, deploying fire attack lines capable of flowing 150 gpm, and rescuing victims if possible. Total response time for the arrival of ERF will be 10:10 in dense urban and urban areas; 19:10 in suburban areas; and 25:30 in rural areas. ERF will be staffed with a minimum of 21 personnel.

HazMat High 1

For 90% of all HazMat High 1 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit should already have arrived on a HazMat Low 2 response. Additional companies on HazMat High 1 incidents should be able to conduct robust offensive HazMat mitigation operations. Total response time for the arrival of ERF will be 08:00 in dense urban and urban areas; 15:00 in suburban areas; and 20:00 in rural areas. ERF will be staffed with a minimum of 14 personnel.

HazMat High 2

For 90% of all HazMat High 2 responses, total response time for the first arriving unit will be 04:00 in dense urban and urban areas; 10:00 in suburban areas; and 14:00 in rural areas. The first arriving unit will be capable of providing 700 gallons of water and 1500 gpm pumping capacity, establishing incident command, scene size-up, arrival report, requesting additional resources if necessary, deploying fire attack lines capable of flowing 150 gpm, isolating and denying entry, product identification if possible, performing first responder mitigation tactics if possible, and conducting evacuations or rescues as needed. Total response time for the arrival of ERF will be 10:10 in dense urban and urban areas; 19:10 in suburban areas; and 25:30 in rural areas. ERF will be staffed with a minimum of 25 personnel.





Sacramento Metropolitan Fire District

10545 Armstrong Ave., Suite 200 • Mather, CA 95655 • Phone (916) 859-4300 • Fax (916) 859-3702

August 28, 2019

SENT VIA EMAIL

Jamie Gomes, Managing Principal
Economic & Planning Systems
400 Capital Mall, 28th Floor, Sacramento, CA 95814

Subject: Comment Letter for the West Jackson Highway Master Plan

Dear Mr. Gomes:

Thank you for taking the time to meet with us on August 19th regarding the West Jackson Highway Master Plan (Project). Based on our meeting, the Sacramento Metropolitan Fire District (District) has the following comments:

Urban Services Plan

Comment #1 – The District has developed a fire and emergency services plan for the Jackson Corridor Area as a whole. This plan is based on the District's population estimates for the Jackson Corridor Area (Corridor), consistent with the persons-served population included in the County's Base Fiscal Model (100,799 persons served). According to the County's Base Fiscal Model the Project will serve 64,068 people or approximately 63.5% of the Corridor. The service plan will be based on an Urban Level of Service (Urban LOS), which requires a 4-minute drive (in-route to on-scene) time.

Comment #2 – Each project will be responsible, at its buildout, for its proportionate share of Corridor operations and maintenance costs based on persons served. The District estimates its total annual service cost for the Corridor is \$23,450,000 (2018\$).

Comment #3 – For purposes of the Urban Services Plan, the District will evaluate each of the four projects as a standalone project, meaning that only the proposed project is moving on with development. A single project will trigger an Urban LOS. Under this approach:

- District will identify any existing stations that have the ability to provide service to initial development given District service standards. If existing station(s) are identified, District will also calculate how many persons served can be added to the area before a new station is required.

- District will identify the annual costs to operate the new station, including any benchmarks for increased service as the population grows. The project proponent will calculate the number of units that need to be developed to fully fund the operation of that station.
- Until the new station is fully funded by the project, the project will be expected to implement a gap funding mechanism, such as a Services CFD. As additional development occurs the underlying tax rate per unit would decrease until it is eventually eliminated when property tax revenues are sufficient to fund the District's operational costs.

Comment #4 – When the Project moves forward with implementation, service costs could be less than analyzed in the standalone forecast. Specifically, if more than one project develops concurrently, a Rural LOS (14-minute drive time) or Emerging Suburban LOS (10-minute drive time) may be applied to multiple projects as they develop—the actual LOS level will depend on the overall density of developing areas. Rural and/or Emerging LOS levels may produce a delay in the need for one or more new station(s). When individual projects move forward with development, these efficiencies will be identified based on the location and scale of other new development occurring at that time within the Jackson Corridor service area.

Station Master Plan and New Station Locations

In 2010, the District adopted a neighborhood-based fire company deployment plan, with response times, meeting national best practice recommendations. These response standards are in place to deliver good outcomes to keep serious, but still emerging, fires small and to rescue and treat the emergency's victims. For areas that have over 1,000 people per square mile (Suburban/Urban Areas), the District's standard 1st due travel time is four minutes with an overall reflex time of seven minutes. Given the Project's acreage and proposed land uses, the proposed development fits with the District's Suburban/Urban Area model. Additionally, multiple units are needed to quickly control building fires. The District's performance standard for an Effective Response Force to a building fire incident is to deliver 3 engines, 1 ladder truck and 1 battalion chief and have all the units arrive at the incident within 8 minutes travel time.

In 2013, the District commissioned the Fire Department Growth Analysis (Station Master Plan) to anticipate the number and location of new fire stations that will be required to serve the Project and surrounding areas given the 1st Due and 1st Alarm response requirements. The Growth Analysis anticipated 3 new stations, commonly referred to as Future Station #9 (F-9), Future Station #11 (F-11) and Future Station #16 (F-16) are needed to meet the 1st Due response requirements for the Project area and portions of the adjacent Florin-Vineyard Gap and North Vineyard Station developments. The Project area will also be served, in part, by existing stations #54 and #62.

- F-9 should be located approximately ¼ of a mile north of Jackson Road along, or very near, Bradshaw Road.
- F-11 should be located along Elder Creek Road approximately ¼ of a mile east of Hedge Avenue.
- F-16 should be located along Florin Rd in between Excelsior Road and future Vineyard Road in Future Planning Area C.

Fire Service

Based on the proposed land use, the District estimates the Project could generate approximately 12,000 emergency calls per year at full buildout. Additionally, given the large amount of wetland preserve and urban farm, the District anticipates the need for wildland fire protection. Based on this information, 1st Due Response for the Project would include:

- Future 9 (100% West Jackson)
 - 2 Structural Engine Companies (full time assignment)
 - 1 Wildland Fire Engine (cross-staffed by structural engine company)
 - 1 Medic Company (full time assignment)
- Future 11 (20% West Jackson, 80% Vineyard)
 - 2 Structural Engine Companies (full time assignment)
 - 1 Medic Company (full time assignment)
- Future 16 (65% West Jackson, 35% Vineyard)
 - 1 Structural Engine Company (full time assignment)

The District anticipates additional specialized resources for 1st Alarm response requirements will be dispatched to the Project area from existing Station #50 and future Station #38 as battalion headquarters for the area.

Station Criteria, Lot Size and Timing

To meet the District's 1st Due and Effective Response Force standards, the District requires the new stations to meet the following criteria:

- Future 9
 - 4 Bay:10 Bed Station
 - 5-8 acre site for station, satellite apparatus bays and battalion training ground
- Future 11
 - 4 Bay:10 Bed Station
 - 3-4 acre site for station
- Future 16
 - 3 Bay: 8 Bed Station
 - 2-4 acre site for station

Please see the attached memo regarding site requirements for Metro Fire stations.

District policy requires new stations to be operational by the time the Project's population density exceeds 1,000 people per square mile outside of the 4 minute response time from an in-service station.

If you have any questions, please feel free to contact me at (916) 859-4517 or via email at frye.jeff@metrofire.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Frye". The signature is fluid and cursive, with the first name "Jeff" being more prominent than the last name "Frye".

Jeff Frye
Economic Development Manager

Attachment: Memo - Site Requirements for Metro Fire Stations



Sacramento Metropolitan Fire District

10545 Armstrong Ave., Suite 200 _ Mather, CA 95655 _ Phone (916) 859-4300 _ Fax (916) 859-3702

TODD HARMS
Fire Chief

MEMO

DATE: November 9, 2021

TO: Land Development Project Applicants

FROM: Jeff Frye, Chief Development Officer

SUBJECT: Site Requirements for Metro Fire Stations

- Zoning:
 - Entitlements for use as fire station in a non-residential area
 - No co-location with schools or libraries.
- Location Requirements:
 - At least 5 feet above 100 year flood plain
 - Frontage on main or secondary thoroughfare:
 - Cut-out in median for egress in both directions
 - At least 500 feet from signal controlled intersection at major thoroughfare
 - Emergency traffic light to stop traffic for emergency vehicles (based on traffic counts)
 - No overhead utility easements
 - Good line of sight for exiting emergency vehicles:
 - Preference for site at crest of hill or level
 - No curves in road
- Size Requirements:
 - Approximately 3 acres of level usable land:
 - Corner Site: +/- 350' minimum street frontage and +/- 300' depth
 - Interior Site: +/- 400' minimum street frontage and +/- 300' depth
- Essential Services Facility Requirements:
 - Good homogeneous soils, graded level and compacted to minimum 90% relative compaction
 - Utilities readily available at site including water, sewer, storm water, power, gas, phone and cable
 - Water supply as required by Fire Prevention (approx. 2,000 GPM at 20 PSI)
 - No radio communication interference



October 29, 2024

SENT VIA EMAIL

Sacramento County
Department of Community Development, Planning and Environmental Review Division
Attention: Environmental Coordinator
827 7th Street, Room 225
Sacramento, CA 95814

SUBJECT: West Jackson Highway Master Plan (State Clearinghouse No 2013092021, County Control Number PLNP2008-00240)

Mrs. Newton,

Our office wanted to reach out to you again regarding this project, as we were meeting with our long-term environmental consultant who provided comments for another Sacramento County Planning and Environmental Review application, we were informed that Sacramento LAFCo was not included in the Notice of Preparation for this DEIR. Therefore, we would like to provide additional comments not included in our September 3, 2024 letter:

- **Type of EIR:** Sacramento County has identified the current document as a Program EIR (pp 1-2).
- **Responsible Agency Status:** Sacramento LAFCo is not identified as a responsible agency in the Draft PEIR. Responsible agencies other than LAFCo are discussed in Chapter 1, Introduction, pgs 1-1 – 1-2, pgs 1-65 – 1-6, and Chapter 2, Project Description, pg 2-69.
- **Environmental Topics Within the Jurisdiction of LAFCo:** The Draft Program EIR evaluated the following environmental topics:
 - **Natural Resources – Agricultural Lands:** Extensive evaluation of existing and future agricultural lands within the Plan area; Not evaluated using LAFCo

Commissioners

*Sue Frost, Rich Desmond, County Members ■ Patrick Hume, Alternate
Iva Walton, Lisa Kaplan, City Members ■ Jay Vandenburg, Katie Valenzuela, Alternates
Chris Little, Public Member ■ Timothy Murphy, Alternate
Lindsey Carter, Gay Jones, Special District Members ■ Charlea Moore, Alternate*

Staff

*José C. Henriquez, Executive Officer ■ Desirae Fox, Kristi Grabow, Policy Analysts
Nancy Miller, DeeAnne Gillick, Commission Counsel*

standards as required by the Government Code. Chapter 5, Agricultural Resources.

- **Natural Resources – Open Space:** Partially evaluated without referring to LAFCo standards; mentioned in Chapter 2, Project Description; Chapter 4, Aesthetics; and Chapter 5, Agricultural Resources; no environmental evaluation of open space per se. Proposed open space would total 1,882 acres (32% of project area). With the addition of parks, open space would entail 2,101 acres or 35.5% of project, based on Chapter 2, Project Description.
- **Population, Employment and Housing:** Housing resources are discussed in EIR Chapter 15, Land Use/Population/Housing, including the project's meeting of affordable housing requirements; LAFCo's policies and requirements regarding these issues are not discussed in Chapter 15.
- **Environmental Justice:** Very limited evaluation of project and transportation goals relative to EJ. Chapter 15, Land Use/Population/Housing, pg 15-40. No other information regarding environmental justice is provided.
- **Public Services/Utilities:** Extensive evaluation of public service and utility providers and facilities. Discussion of Public Facilities Financing Plan. Evaluation of the capability of existing service and utility providers to serve the proposed project. Chapters 17, Public Services, and 18, Public Utilities.

We would like to request that Sacramento LAFCo be included in the routing of future Notice of Preparations. If you have any questions regarding the comments above, please do not hesitate to reach out to our office. Thank you again for including LAFCo in this process.

Regards,



Kristi Grabow
Policy Analyst