APPENDIX B RESPONSE TO COMMENTS ON THE NOTICE OF PREPARATION

This page intentionally left blank.

Appendix B includes comment letters received during the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) comment period. Comment letters are organized by author.

Letters were received from the following agencies and individuals:

State Agencies

- California, Natural Resources Agency, Department of Parks and Recreation; September 14, 2017.
- California, State Transportation Agency, Department of Transportation, District 3 –
 Sacramento Area Office; September 18, 2017
- California, Water Boards, Central Valley Regional Water Quality Control Board; September 8, 2017.

Local and Regional Agencies

- County of Placer, Planning Division; September 18, 2017.
- County of Sacramento, Office of Planning and Environmental Review; September 15, 2017.
- Sacramento Area Council of Governments; September 15, 2017.

Utilities

- Sacramento Municipal Utility District (SMUD); September 15, 2017
- Sacramento Regional County Sanitation District (Regional San); August 23, 2017.

Non-Governmental Organizations and Public

- Environmental Council of Sacramento (ECOS), Habitat 2020, and California Heartland Project; September 18, 2017.
- Friends of Lakes Folsom & Natoma (FOLFAN); September 18, 2017.
- Heritage Preservation League; September 18, 2017.
- Leary, Barbara; September 15, 2017.
- Save the American River Association (SARA); September 18, 2017.

= PE PE

Lisa Ann L. Mangat, Director

DEPARTMENT OF PARKS AND RECREATION
Gold Fields District
7806 Folsom Auburn Road
Folsom, CA 95630

September 14, 2017

Scott Johnson, City of Folsom Planning Manager City of Folsom 50 Natoma Street Folsom, CA 95630

Dear Mr. Johnson,

The purpose of this letter is to provide initial comments by the Gold Fields District of the California Department of Parks and Recreation (State Parks) on the City of Folsom (the City) Draft 2035 General Plan in response to the Notice of Preparation (NOP) dated August 18, 2017. The City of Folsom boundary includes State and Federal lands that are managed by State Parks as Folsom Lake State Recreation Area (FLSRA) and Folsom Powerhouse State Historic Park (FPSHP). The Federal lands are managed by State Parks through a Managing Partner Agreement with the U.S. Bureau of Reclamation (Reclamation). The Department also operates Prairie City State Vehicular Recreation Area (SVRA), a portion of which is within the General Plan Planning Area. State Parks previously sent a July 10, 2017 letter to the City regarding the Draft 2035 General Plan.

River District Overlay

As part of the Draft General Plan, the City has developed a new policy in the Land Use Element that includes a River District Overlay designation. This new overlay district is mentioned in the NOP, but does not appear in the January 2017 version of the Draft Plan which is the document posted on the City website and the General Plan website. An edited version of the Draft 2035 General Plan, dated April 2017, was part of the meeting materials submitted to the City Council for the July 11, 2017 Council meeting and does include a section on the River District Overlay. It would be helpful if the most recent versions of the Draft 2035 General Plan were available for public review on both the City and General Plan websites.

This River District Overlay area includes both State and Federal lands that are managed by State Parks as part of FLSRA and FPSHP. Both of these State Park units are managed according to the General Plan/Resource Management Plan developed for these park units jointly by State Parks and Reclamation. The California Department of Parks and Recreation Commission approved and adopted the FLSRA/FPSHP General Plan/Resource Management Plan in October 2009 and Reclamation adopted this same plan in October 2015 through issuance of a Record of Decision.

The FLSRA/FPSHP General Plan/Resource Management Plan provides a vision, goals and guidelines for the development and management of the lands and protection of resources within FLSRA/FPSHP including State and Federal lands that may fall within

the City of Folsom boundary. The development of the FLSRA/FPSHP General Plan/Resource Management Plan included substantial public input and involvement including extensive input from the City of Folsom. A number of guidelines in the Plan were developed that reflect that involvement and input from the City.

The proposed River District Overlay includes a goal of enhancing the riverfront areas in order to increase public access, recreational opportunities and economic development. The new proposed River District Overlay policies identify development of a vision and a Master Plan for the River District. The policies mention coordination with the California Department of Parks and Recreation, however it may not be apparent to most readers of the Plan that a significant portion of the proposed River District is composed of Federal or State lands. These lands are currently identified as open space (OS) in the Land Use Diagram.

State Parks believes it is important for readers of the City of Folsom General Plan and for those involved in future public engagement for a River District vision and Master Plan to clearly understand the jurisdiction of the lands within the proposed River District Overlay and that those State and Federal lands within the District that are part of FLSRA and FPSHP are developed, operated and managed according to the FLSRA/FPSHP General Plan/Resource Management Plan. The City General Plan and the environmental analysis to be prepared for the Plan should recognize that any proposals within the Plan that are located on the State or Federal lands within FLSRA and FPSHP would need to be consistent with the General/Resource Management Plan. State Parks recommends the City make these distinctions explicit in the City of Folsom General Plan document to avoid confusion in the future. State Parks also recommends the City of Folsom General Plan reference the Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park General Plan/Resource Management Plan as the guiding document for the lands within these two park units that fall within the proposed River District.

The Parks and Recreation Chapter of the City of Folsom General Plan does include a Governmental Coordination section that recognizes adjacent State and regional parks. The Land Use Chapter might similarly identify goals and policies for coordinating with State Parks and Reclamation regarding the development of the River District Master Plan.

LU 4.1.6 - Corporation Yard Special Study Area

The January 2017 version of the Draft General Plan includes a policy to develop a special study area for the existing Folsom corporation yard to determine the best use of the site when the corporation yard is moved to its new site. The existing corporation yard is immediately adjacent to FLSRA lands along Lake Natoma, hence State Parks has an interest in the future plans for this site. The corporation yard also appears to be within the proposed River District Overlay. State Parks is interested in participating in any study for the future use of the corporation yard and is interested to know of the relationship between the proposed study for the corporation yard and the proposed River District Master Plan. The FLSRA GMP/RMP does discuss coordinating with the City and community regarding appropriate public access and trail connections from the City Corporation Yard when the property is used for another purpose.

General Plan Planning Area

The NOP notes that the 2035 General Plan Planning Area includes two areas that are currently outside the City limits. One of these areas is a 3,700 acre area south of White Rock Road. The NOP notes and State Parks would just like to re-iterate that this area does include a portion of Prairie City SVRA, an existing and popular off-highway vehicle recreation area. Prairie City SVRA is managed according to the Prairie City SVRA General Plan which was approved in 2016. It is unclear from the NOP what specific goals or guidelines the City General Plan will adopt for this area, but State Parks believes it is important for the General Plan and the environmental analysis to be prepared for the plan to recognize this existing use.

A second area outside the City limits that is included in the Planning Area is approximately 1,900 acres west of Prairie City Road to Hazel Avenue which includes portions of the Nimbus Flat Day Use Area within FLSRA. Again it is important for the General Plan and any future environmental analysis to acknowledge that the portion of the land in this second area that is within FLSRA is managed under the previously mentioned FLSRA General Plan/Resource Management Plan and that any proposals within FLSRA would need to be consistent with the FLSRA General Plan/Resource Management Plan.

State Park looks forward to working with the City further on the development of the new City General Plan, the River District Overlay and other proposals within the context of State and Federal laws, policies and plans that guide the management of FLSRA and FPSHP.

If you have questions or comments regarding this letter, please contact Senior Park and Recreation Specialist Jim Micheaels (916) 988-0513 jim.micheaels@parks.ca.gov, Folsom Sector Superintendent Rich Preston at (916) 988-0205 rich.preston@parks.ca.gov, or Senior Park and Recreation Specialist Dan Canfield with our Department's OHMVR Division at (916) 324-1574 dan.canfield@parks.ca.gov.

Sincerely

Jason De Wall

District Superintendent

cc: Mr. Drew Lessard, Area Manager, U.S. Bureau of Reclamation, Central CA Area Office

California, Natural Resources Agency, Department of Parks and Recreation September 14, 2017

This letter in response to the Notice of Preparation states that the June 2016 Draft 2035 General Plan defines a "River District" overlay land use designation and the June General Plan Land Use Diagram illustrates the boundaries of the proposed River District. The comment notes that as shown on the Land Use Diagram, the proposed River District encompasses State and federal lands within the Folsom Lake State Recreation Area (FLSRA) and the Folsom Powerhouse State Historic Park (FPSHP), in addition to privately-owned land and City property within the City of Folsom. The comment indicates that both State Park units are governed by a State and federally approved General Plan/Resource Management Plan. The comment requests that the 2035 General Plan clarify the jurisdiction of the City with respect to State and federal lands and the authority of the adopted General Plan/Resource Management Plan over lands within the FLSRA and FPSHP. The comment additionally requests that the City adopt policies in the General Plan that would ensure coordination and consultation with the State and federal resource management agencies with jurisdiction over the FLSRA and FPSHP.

The comment expresses similar concerns with respect to proposed Folsom 2035 General Plan policies related to the "Corporation Yard Special Study Area" identified in the Land Use Element, policy 4.1.6.

The comment identifies Planning Area 2 as defined in Chapter 3 of this PEIR, located south of White Rock Road. The comment states that Planning Area 2 encompasses a portion of the Prairie City State Vehicle Recreation Area (PCSVRA). The comment notes that the PCSVRA is managed according to the adopted PCSVRA General Plan, and expresses similar concerns regarding City jurisdiction over State lands. The comment also identifies Planning Area 1, which includes in part the Nimbus Flat Day Use Area within the FLSRA. The comment reiterates previous concerns regarding the adopted Management Plan for the area and City jurisdiction over State lands.

The comment does not identify any direct or indirect environmental issues to be evaluated in the PEIR. Rather, it requests that the text of the 2035 General Plan be amended to respond to the concerns expressed. The City will consider the policy requests of State Parks in its review and processing of the 2035 General Plan. The consistency with the 2035 General Plan with the goals, policies, and management prescription of adjacent public agencies is set forth in Chapter 16, *Public Services and Recreation Resources*, of this Draft Program EIR (PEIR). Additionally, Alternatives 2 and 3 in Chapter 20, *Alternatives Analysis*, also address issues raised in this comment.

DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE 2379 Gateway Oaks Drive, Suite 150 SACRAMENTO, CA 95833 PHONE (916) 274-0638 FAX (916) 274-0602 TTY 711 www.dot.ca.gov/d3/



September 18, 2017

03-SAC-2017-00171 SCH# 2017082054

Mr. Scott Johnson City of Folsom 50 Natoma Street Folsom, CA 95630

Notice of Preparation Folsom 2035 General Plan draft Environmental Impact Report

Dear Mr. Johnson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation (NOP) Folsom 2035 General Plan draft Environmental Impact Report (EIR). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

The purpose of the proposed 2035 General Plan is to revise and replace the existing General Plan, including all of the elements (excluding the Housing Element), the Land Use and Circulation Diagrams, and other existing goals, policies, and implementation plans as needed to reflect current law and the changing matters of public interest and concerns. The 2035 General Plan will establish and implement new goals and policies to further the City's vision of itself set forth in the Plan. The Plan will also integrate new planning concepts endorsed by the Folsom City council, and translate the updated goals and policies into implementation programs (such as amendments to the City's code, zoning ordinance, and subdivision regulations) to assure that the City's vision is implemented. The following comments are based on the NOP received.

General Comments

It is suggested that the General Plan make clear that early coordination with Caltrans is required for any project proposal that would entail any ongoing ingress or egress; or work within, over, under, or adjacent to public transportation right of way (ROW) (for example: driveways; striping; shoulder enhancement; cut and fill sloping; drainage changes; debris removal; utility

Mr. Scott Johnson September 18, 2017 Page 2

installations and maintenance; sound walls; fencing; signage; lighting; vegetation alteration sidewalks; transit pullouts or shelters; traffic management during events; use of cranes, etc.) that might require an encroachment permit, airspace lease, traffic management plan, or outdoor advertising permit to mitigate direct physical impacts. As a rule of thumb, in accordance with most local jurisdiction land use development permit requirements, Caltrans should be notified of all proposals that will entail construction or facilities on parcels with boundaries that occur within 300 feet of state ROW.

As part of the circulation network, improvements to the State Highway System (SHS) and the operation of the SHS are a shared responsibility between the City of Folsom and Caltrans. This should be reflected in a policy statement within the Folsom 2035 General Plan.

Vehicles Miles Traveled (VMT)

Moving toward the State's Senate bill (SB) 743 goals includes supporting infill land use, reducing greenhouse gas emission, and supporting active transportation. Caltrans suggests that the General Plan update include a VMT-based transportation analysis that assesses impacts and mitigates with transportation demand management (TDM), multimodal, and operational efficiency projects.

Caltrans strongly recommends the City explore developing their own VMT thresholds for CEQA analysis, in coordination with the Sacramento Area Council of Governments. Other jurisdictions are moving to this CEQA threshold as they look toward the near future where LOS is being phased out and being replaced by VMT as a CEQA threshold of significance for transportation impacts.

Traffic Operations

It is recommended that the EIR include a Transportation Impact Study to determine potential project impacts to State and local facilities within the City of Folsom's Planning Area and to propose improvements to mitigate those impacts. State facilities must include U.S. Route (US) 50 mainline and interchanges within the City of Folsom Planning Area. The scope of the study should cover the following elements:

- 1. Existing conditions without the project for current year
- 2. Existing conditions plus the project by phases
- 3. Cumulative conditions without the project
- 4. Cumulative conditions with project build-out

Mr. Scott Johnson September 18, 2017 Page 3

The Study should also provide Level of Service (LOS) analysis for the following locations:

- 1. On US/50 Folsom Boulevard Interchange;
- 2. US 50/ Prairie City Road Interchange;
- 3. US 50/East Bidwell Street Interchange

The study should include analysis for freeway mainlines, ramps, and ramp terminal intersections at the above identified interchanges. A merge/diverge analysis should be performed for freeway and ramp junctions. All analyses should be based on A.M. and P.M. Peak Hour volumes. The analysis should include the individual, not averaged, LOS and Length of Queue for each intersection road approaches and turn movements.

CEQA Streamlining

As part of SB 375, a streamlined process for CEQA review was established for certain types of developments. The Sacramento Area Council of Governments (SACOG) contained many of these policies in the Metropolitan Transportation Plan/Sustainable communities Strategy (MTP/SCS).

Since some streamlining provisions would essentially exempt project level analysis of impacts to the SHS, potential direct and cumulative SHS impacts should be analyzed and mitigated by the General Plan and associated documents. Caltrans has a common interest with the City to see that SHS safety impacts and other operation deficiencies are addressed to preserve mobility to, from, and within the City. By addressing impacts at the General Plan level, Caltrans and the City can ensure that those impacts are mitigated or avoided, while also providing streamlining benefits at the project level. Caltrans requests that coordination occur with the City of Folsom on identifying impacts and determining appropriate mitigation measures, focusing on those which do not increase VMT.

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

If you have any questions regarding these comments or require additional information, please contact Jennifer Synhorst, Intergovernmental Review Coordinator, at (916) 274-0639 or by email at jennifer.synhorst@dot.ca.gov.

Mr. Scott Johnson September 18, 2017 Page 4

Sincerely,

JEFFERY MORNEAU

Office of Transportation Planning – South Branch

c: State Clearinghouse

California, State Transportation Agency, Department of Transportation, District 3 – Sacramento Area Office September 18, 2017

This letter in response to the Notice of Preparation recommends that the 2035 General Plan contain text and policies to acknowledge the role of Caltrans in reviewing and approving work on the State Highway System (SHS), and the shared responsibility between the City and Caltrans regarding improvements to the SHS. The comment requests that the 2035 General Plan include a vehicle miles travelled (VMT) analysis and include measures to reduce the growth of VMT with General Plan implementation. The comment requests that the PEIR include a traffic impact study that assesses both existing and cumulative conditions, and that includes an analysis of impacts to the SHS. The comment provides information regarding the streamlining of the environmental review of identified transportation improvements.

The City will consider the policy requests of Caltrans in its review and processing of the 2035 General Plan. For an evaluation of the proposed 2035 General Plan's effects to transportation and mobility, refer to Chapter 17, *Transportation and Circulation*, of the Draft PEIR.





Central Valley Regional Water Quality Control Board

8 September 2017

Scott Johnson City of Folsom 50 Natoma Street Folsom, CA 95630 CERTIFIED MAIL 91 7199 9991 7035 8360 3872

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, FOLSOM 2035 GENERAL PLAN PROJECT, SCH# 2017082054, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 18 August 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environment Impact Report* for the Folsom 2035 General Plan Project, located in Sacramento County.

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

I. Regulatory Setting

Basin Plan

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

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

KARL E. LONGLEY SCD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

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

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website: http://www.waterboards.ca.gov/centralvalley/water issues/basin plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at: http://www.waterboards.ca.gov/centralvalleywater issues/basin plans/sacsir.pdf

In part it states:

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

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

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

II. Permitting Requirements

Construction Storm Water General Permit

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

(SWPPP).

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

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

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

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

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

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

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

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

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

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

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

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.

United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

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

Clean Water Act Section 401 Permit – Water Quality Certification

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

Waste Discharge Requirements (WDRs)

Discharges to Waters of the State

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

Land Disposal of Dredge Material

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

Local Agency Oversite

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

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

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

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

Dewatering Permit

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

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

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/w qo2003-0003.pdf

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

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

Regulatory Compliance for Commercially Irrigated Agriculture

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

- 1. Obtain Coverage Under a Coalition Group. Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_appr oval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
- 2. Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100. Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the

Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

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

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

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

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

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

NPDES Permit

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

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

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

Stephanie Tadlock

Environmental Scientist

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

California, Water Boards, Central Valley Regional Water Quality Control Board September 8, 2017

This letter in response to the Notice of Preparation sets forth the regulations, policies, and permitting requirements for urban land uses as administered by the Central Valley Regional Water Quality Control Board. The comment raises no environmental issues to be evaluated in the PEIR.

The Draft PEIR includes the relevant regulatory setting information contained in the letter in Chapter 9, *Biological Resources*, and Chapter 14, *Hydrology and Water Quality*.



September 18, 2017

Scott Johnson, Planning Manager City of Folsom, Community Development Department 50 Natoma Street Folsom, CA 95630 via email: generalplan@folsom.ca.us

Subject: Folsom 2035 General Plan NOP

Dear Mr. Johnson:

Placer County appreciates the opportunity to engage at this early stage in the process. After reviewing the submitted information, the County offers the following comments for your consideration regarding the proposed project:

Placer County Flood Control and Water Conservation District
The proposed Folsom 2035 General Plan has the potential to create the following impacts:

- a) Increases in peak flow runoff downstream of the plan area.
- b) Overloading of the actual or designed capacity of existing stormwater and flood-carrying facilities.

Future EIRs must specifically quantify the incremental effect of the above impacts due to this plan, and must propose mitigation measures where appropriate.

Department of Public Works and Facilities

In anticipation of the recently signed Senate Bill 743, which focuses on the environmental impact metric of Vehicle Miles Traveled (VMT), regional mobility and associated linkages of infrastructure and services will be imperative to include into long range planning strategies into the future. The NOP for the Folsom General Plan Update includes elements of Mobility with linkages to Economic Prosperity in the following draft goals as well as Guiding Principle #10:

- M1.1 Provide a comprehensive, integrated and connected network of transportation facilities...
- M 6.1 Maintain and increase cooperation between Folsom and neighboring jurisdictions.....
- EP 3.2 Provide opportunity for expansion of businesses by ensuring the availability of suitable sites, appropriate zoning, and access to infrastructure and amenities.
- EP 4.1 Be a key partner in the region in order to achieve the City's..... goals.
- EP 5.1 Maintain and expand retail and services to meet local and regional demands....

The future urban growth plan initiates both residential land use as well as regional employment centers. Regional employment could have an effect on the regional multimodal transportation framework and result in regional impacts to neighboring communities.





Placer County would request that a collaborative discussion be initiated relative to the future need to promote and encourage transit connections between major urban centers and interregional infrastructure (i.e. Folsom, Roseville, Western Placer, I-80) via mass transit facilities and services as well as provide for other multi model transportation opportunities. Furthermore, the County requests that the transportation and circulation chapter of the City of Folsom EIR includes a traffic analysis which identifies changes in VMT on regional roadways outside the City's boundary but within a reasonable vicinity; Auburn Folsom Road (via Folsom/Auburn Rd), Douglas Blvd (within the Granite Bay Community Plan), and Sierra College Blvd (via Hazel Ave).

Thank you again for the opportunity to comment on the Notice of Preparation for the Folsom 2035 General Plan project. Should you have any questions, please contact Leigh Chavez, Environmental Coordinator at lchavez@placer.ca.gov or 530-745-3077.

Sincerely,

Page 2

LEIGH CHAVEZ, PRINCIPAL PLANNER **ENVIRONMENTAL COORDINATOR**

County of Placer, Planning Division September 18, 2017

This letter in response to the Notice of Preparation transmits comments from the Placer County Flood Control and Water Conservation District (PCFCWCD) and the Placer County Department of Public Works and Facilities (DPWF).

The comments from the PCFCWCD request that the PEIR evaluate the potential for increases in stormwater flows downstream of the 2035 General Plan Planning Area, and the potential for planned urban uses to overload existing or designed capacity in stormwater and flood-carrying facilities.

The comments from DPWF request that the City of Folsom engage in a collaborative discussion among adjacent local governments to coordinate transit linkages within and between urban centers. The comment additionally requests that the traffic analysis presented in the PEIR evaluate changes in VMT on regional roadways outside of the City of Folsom but within a reasonable distance, citing Auburn/Folsom roads, Douglas Boulevard, and Sierra College Boulevard as facilities that should be evaluated.

Chapter 14, *Hydrology and Water Quality*, of the Draft PEIR evaluates environmental effects related to stormwater and flooding. Traffic and circulation effects are evaluated in Chapter 17, *Transportation and Circulation*, of the Draft PEIR.

Office of Planning and Environmental Review Leighann Moffitt, Director



County Executive Navdeep S. Gill

September 15, 2017

Mr. Scott Johnson, Planning Manager City of Folsom, Community Development Department 50 Natoma Street Folsom, CA 95630

RE: Folsom 2035 General Plan NOP

Dear Mr. Johnson:

Thank you for the opportunity for the Sacramento County Office of Planning and Environmental Review (PER) to provide comments on the Notice of Preparation for the City of Folsom's (City) 2035 General Plan Program Environmental Impact Report (PEIR). We understand the City will be preparing a PEIR to analyze the environmental impacts of the City's proposed 2035 General Plan.

The proposed 2035 General Plan does not appear to open up any new growth areas outside of the current City Limits but does identify two planning areas outside of the City in the unincorporated area of Sacramento County. One is the County approved Glenborough and Easton development and the other is the area south of White Rock Road. If the City is contemplating annexation of either of those areas, the PEIR should disclose and analyze any impacts related to those actions. PER staff are available to coordinate with the City if desired.

Currently, Sacramento County is developing Phase 2B of its Climate Action Plan (CAP), which is an effort resulting from adoption of the County's 2011 General Plan. The expectation is that the Phase 2B CAP will be a Plan for the Reduction of Greenhouse Gas Emissions as specified by CEQA guidelines 15183.5 (Qualified CAP). According to the proposed 2035 General Plan, "In addition to laying out Folsom's framework for future development, the 2035 General Plan will also serve as the City's Qualified GHG Reduction Strategy". PER congratulates the City for this step and supports the City's efforts in this endeavor. The PEIR should examine the Greenhouse Gas and Climate Change impacts expected as part of the proposed 2035 General Plan with comparison to the GHG reduction targets promulgated by the State. The Qualified CAP component of the 2035 General Plan should comply with Section 15183.5 of the CEQA Guidelines and the PEIR analysis in combination with the 2035 General Plan should include but not be limited to the following:

- A quantification of greenhouse gas emissions, both existing and projected over the 2035 General Plan's planning horizon and geographic area.
- Establishment of a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities contemplated by the plan would not be cumulatively considerable.
- Identification and analysis of the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area.
- Measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emission level.

PER staff are available to collaborate on regional approaches to GHG reductions and to share expertise and ideas in developing a Qualified CAP that works for our region.

Please continue to keep PER informed of project milestones, outreach, workshops, hearings and other opportunities to provide input. We look forward in working collaboratively with the City to make the proposed 2035 General Plan successful and beneficial for the City and region.

Sincerely,

Leighann Moffitt

Planning Director

County of Sacramento, Office of Planning and Environmental Review September 15, 2017

This letter in response to the Notice of Preparation requests information regarding the City's future plans for Planning Areas 1 and 2 identified on the 2035 General Plan Land Use Diagram. The comment notes that the 2035 General Plan will establish the City's Qualified GHG Reduction Strategy. The comment notes the State requirements necessary to qualify such a Strategy and identifies several necessary analyses.

Regarding the City's intentions regarding the two Planning Areas within unincorporated Sacramento County, please refer to PEIR Chapter 3, *Project Description*, Chapter 4, *Land Use, Population, and Housing*, Chapter 5, *Introduction to the Analysis*, and Chapter 20, *Alternatives Analysis*. Regarding to the assessment of GHG emissions and reduction strategies, see Chapter 12, *Global Climate Change*, of the Draft PEIR.

Sacramento Area Council of Governments 1415 L Street, Suite 300 Sacramento, CA 95814 tel: 916-321-9000 fax: 916-321-9551 tdd: 916-321-9550 www.sacog.org



September 15, 2017

City of Folsom Community Development Department c/o Scott Johnson, Planning Manager 50 Natoma Street Folsom, CA 95630

Re: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the City of Folsom 2035 General Plan

Dear Mr. Johnson,

Citrus Heights Colfax

Auburn

Davis

El Dorado County
Elk Grove

Folsom

Galt Isleton

Live Oak

Lincoln Loomis

Marysville

Placer County

Placerville

Rancho Cordova

Rocklin Roseville

Sacramento

Sacramento County

Sutter County

West Sacramento

Wheatland

Winters

Woodland

Yolo County Yuba City

Yuba County

Thank you for inviting SACOG's comments on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the City of Folsom 2035 General Plan. The basis of our comments is the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and Blueprint. SACOG's primary responsibility is developing and implementing the MTP/SCS, a document that establishes transportation spending priorities throughout the region. The MTP/SCS must be based on the most likely land use pattern to be built over the 20+ year planning period and a forecast of reasonably foreseeable revenues for transportation investment. It also must conform with federal and state air quality regulations and demonstrate GHG reductions under SB 375. The foundation for the MTP/SCS land use forecast is local government general plans, community plans, specific plans, and other local policies and regulations. Other market and regulatory/policy variables that are considered help refine the sum of the local plans in order to determine the most likely future development pattern for a specific period of time. The Blueprint vision is based on the principles of smart growth and is intended to give general direction on how the region should develop to reap the benefits of the Blueprint Preferred Scenario (and related MTP/SCS). Implementation of the Blueprint vision depends greatly on the efforts of cities and counties to implement that vision through local plans and projects. The MTP/SCS and Blueprint are in alignment with each other because of these local efforts.

The current Metropolitan Transportation Plan/Sustainable Communities Strategy (2016 MTP/SCS) was adopted in February 2016. The 2016 MTP/SCS includes a transportation project list and forecasts housing and employment expected through 2036. The Land Use Diagram and Circulation Diagram included in the Notice of Preparation appear generally in alignment with the MTP/SCS; however, there is not enough detail provided for an analytical comparison. The Land Use Diagram does show the planning area extending south of White Rock Road and the existing City limits. This area is not identified for development in the 2016 MTP/SCS. Although there are no land uses being planned for this area in the 2035 General

Plan, identifying the area on the map does signal that this is a potential new growth area that the City is considering. We suggest that the City include strong policies in the 2035 General Plan on the timing and conditions that must be met before new growth can occur in this area, as well as, policies that require phased growth in the area. In general, it is not uncommon that a General Plan will include more growth and transportation projects than what is in the MTP/SCS. General Plans typically envision the ultimate build out of the jurisdiction whereas the MTP/SCS is a financially constrained plan for a particular period of time, is updated every four years, and is subject to a transportation conformity requirement under the federal Clean Air Act.

SACOG will begin its quadrennial update of the MTP/SCS in early 2018 and will be working with the City of Folsom to determine if there is a need to update the project list and/or projections for the City in the next MTP/SCS. With limited transportation funds available, constrained growth projections, and a higher SB 375 GHG target for the next MTP/SCS, we will be encouraging all our member jurisdictions to identify their high priority areas for growth and transportation funding. We look forward to further discussions with the City throughout the General Plan update process and as the MTP/SCS update process moves forward next year.

Thank you again for the opportunity to comment and for continuing to engage us in this important process. Please don't hesitate to contact me or Kacey Lizon, Planning Manager, at <u>klizon@sacog.org</u> or 916-340-6265 if you have further questions.

Sincerely,

James Corless

Chief Executive Officer

JC:KL:JH:sm

Sacramento Area Council of Governments (SACOG) September 15, 2017

This letter in response to the Notice of Preparation states that the adopted Regional Blueprint and Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) establish the foundation for SACOG's comments on the City's proposed 2035 General Plan. While recognizing that the majority of the land proposed for urban development in the 2035 General Plan generally aligns with the MTP/SCS land use assumptions, the comment expresses concern with Planning Area 2 south of White Rock Road in unincorporated Sacramento County. The comment acknowledges that no land uses or explicit policies are identified for this area in the 2035 General Plan, but expresses concern about the growth inducing aspects of identifying the area on an urban General Plan. The comment requests that the 2035 be amended to include policies to prevent premature or disorderly urban development within Planning Area 2.

The City will consider the policy requests of SACOG in its review and processing of the 2035 General Plan. For an evaluation of the proposed 2035 General Plan's consistency with the adopted plans and policies of public agencies with jurisdiction over resources and lands within and adjacent to the 2035 General Plan planning area and growth inducement, refer to Chapter 4, *Land Use, Population, and Housing,* Chapter 5, *Introduction to the Environmental Analysis*, and Chapter 20, *Alternatives Analysis*, of the Draft PEIR.



Sent Via E-Mail

September 15, 2017

Scott Johnson, Planning Manager City of Folsom Community Development Department 50 Natoma Street Folsom, CA 95630 generalplan@folsom.ca.us

Subject: Notice of Preparation (NOP) to Prepare a Program Environmental Impact

Report (EIR) for the Folsom 2035 General Plan

(Clearinghouse No. 2017082054)

Dear Mr. Johnson:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) to prepare a Program Environmental Impact Report (EIR) for the Folsom 2035 General Plan. SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

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

- Overhead and or underground transmission and distribution line easements.
 Please view the following links on smud.org for more information regarding transmission encroachment:
 - https://www.smud.org/en/business/customer-service/support-andservices/design-construction-services.htm
 - https://www.smud.org/en/do-business-with-smud/real-estate-services/transmission-right-of-way.htm
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery

Please note that the City of Folsom General Plan Update may result in impacts to SMUD's electrical system within areas designated for new development and/or redevelopment. Potential impacts will be determined as more detailed information is available. Generally, SMUD requires easements for all electrical facilities within new developments. Moreover,

SMUD's standard practice is to install new distribution lines (12kV) underground; subtransmission (69kV) and transmission (230kV) facilities are constructed overhead. However, SMUD will consider installing 69kV underground if it is technically feasible based on specific site conditions and the incremental cost is borne by project Applicants.

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 EIR. If you have any questions regarding this letter, please contact Ammon Rice at ammon.rice@smud.org or (916)732-7466.

Sincerely,

Angela C. McIntire

Regional & Local Government Affairs Sacramento Municipal Utility District 6301 S Street, Mail Stop A313 Sacramento, CA 95817

angele c. na

angela.mcintire@smud.org

Cc: Ammon Rice, SMUD

Sacramento Municipal Utility District (SMUD) September 15, 2017

This letter in response to the Notice of Preparation states that SMUD is the primary electricity provider for Sacramento County, including the 2035 General Plan Planning Area. The comment requests that the following issues be assessed in the PEIR:

- Overhead and or underground transmission and distribution line easements.
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery

The Draft PEIR includes analyses of utilities needed to serve the 2035 General Plan Planning Area in Chapter 19, *Utilities and Service Systems*. Climate change, including the emissions of electricity generation, is assessed in PEIR Chapter 12, *Global Climate Change*. Cumulative Impacts and energy efficiency are assessed in Chapter 21, *Required CEQA Analyses*. It should be noted though, that the specific evaluations of transmission and distribution lines, and utility line routing requested in the comment are beyond the scope of the PEIR. For additional information regarding the level of detail used in the environmental analysis, refer to Chapter 1, *Introduction*, and Chapter 5, *Introduction to the Analysis* of this Draft PEIR. Finally, potential future land uses proposed in the 2035 General Plan are limited to the Folsom Plan Area Specific Plan (FPASP) area south of Highway 50, and scattered new infill development north of Highway 50. For the FPASP area, SMUD has worked closely with the City to define and implement the facilities necessary to provide electric service to urban uses within this area.



August 23, 2017

Main Office

10080 Goethe Road Sacramento, CA 95827-3553 Tel: 916.876.6000 Fax: 916.876.6160

Treatment Plant

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

Board of Directors

Representing:

County of Sacramento County of Yolo City of Citrus Heights

City of Elk Grove City of Folsom

City of Rancho Cordova

City of Sacramento

City of West Sacramento

Prabhakar Somavarapu

District Engineer

Ruben Robles

Director of Operations

Christoph Dobson

Director of Policy & Planning

Karen Stoyanowski

Director of Internal Services

Joseph Maestretti

Chief Financial Officer

Claudia Goss

Public Affairs Manager

www.srcsd.com

Scott Johnson, Planning Manager City of Folsom, Community Development Department 50 Natoma Street Folsom, CA 95630

Subject: Notice of Preparation of a Draft Program Environmental Impact Report for the Folsom 2035 General Plan (2035 General Plan)

Dear Mr. Johnson:

Sacramento Regional County Sanitation District (Regional San) and the Sacramento Area Sewer District (SASD) have the following comments regarding the Notice of Preparation for the 2035 General Plan:

The City of Folsom Department of Public Works provides the majority of the local sewer service for the City of Folsom; however, SASD provides local collection for a small portion of the City located near the Folsom Auto Mall. The local collection system route sewer flows through Regional San owned interceptors where it is treated at the Sacramento Regional Wastewater Treatment Plant (SRWTP) located in the City of Elk Grove.

The Regional San Board of Directors adopted the Interceptor Sequencing Study (ISS) in February 2013. The ISS updated the SRCSD Master Plan 2000 is located on the Regional San website at http://www.regionalsan.com/ISS. The SASD Board of Directors approved the most current SASD planning document, the 2010 System Capacity Plan Update (SCP) in January 2012. The SCP is on the SASD website at http://www.sacsewer.com/devres-standards.html.

Regional San and SASD are not land-use authorities. Regional San and SASD design their sewer systems using predicted wastewater flows that are dependent on land use information provided by each land use authority. Regional San and SASD base the projects identified within their planning documents on growth projections provided by these land-use authorities.

Regional San administers a Pretreatment Program based on the requirements of its NPDES Permit. Regional San's <u>Wastewater Source Control Section</u> (WSCS) administers the program throughout Sacramento County, including areas within the boundaries of contributing agencies, such as the City of Folsom. In addition to the federally required program elements such as Significant Users and Categorical Users, WSCS administers programs designed to further protect Regional San and local contributing agency systems, and enhance source reduction efforts targeting specific pollutants. Examples of these programs are Non-Significant users, Dry Cleaners, Groundwater Remediation discharges, Temporary Permits, and Surface Cleaners.

As part of these programs, WSCS issues wastewater discharge permits to users. The permits include restrictions, prohibitions, and specific requirements related to the wastewater discharge into the sewer system. These permits are issued for specific time periods and are renewed at corresponding intervals.

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

The SRWTP provides secondary treatment using an activated sludge process. Incoming wastewater flows through mechanical bar screens and then through a primary sedimentation process. This allows most of the heavy solids to settle to the bottom of the tanks. These solids are later delivered to the digesters. Next, oxygen is added to the wastewater to grow naturally occurring microscopic organisms, which consume the organic particles in the wastewater. These organisms eventually settle on the bottom of the secondary clarifiers and are also delivered to the digesters. Clean water pours off the top of these clarifiers and is chlorinated, removing and inactivating any pathogens or other harmful organisms that may still exist. Chlorine disinfection occurs while the wastewater travels through a two-mile "outfall" pipeline to the Sacramento River, near the town of Freeport, California. Before entering the Sacramento River, sulfur dioxide is added to neutralize the chlorine.

The design of the SRWTP and collection system was balanced to have SRWTP facilities accommodate some of the wet weather flows while minimizing idle SRWTP facilities during dry weather. Regional San designed the SRWTP to accommodate some wet weather flows with onsite storage basins and interceptors designed to accommodate the remaining wet weather flows. The Central Valley Regional Water Quality Control Board (Water Board) issued an NPDES Discharge Permit in December 2010 (2010 Permit)-requiring Regional San to meet significantly more restrictive treatment levels for ammonia and nitrate by May 2021 and for pathogens by May 2023. Regional San began the necessary activities, studies, and projects to meet the new requirements with the adoption of the 2010 Permit. In April 2016, the Water Board issued an NPDES Discharge Permit (2016 Permit) which replaced the 2010 Permit while continuing the more restrictive treatment requirements and deadlines.

Regional San currently owns and operates a 5-mgd Water Reclamation (WRF) that has been producing Title 22 tertiary recycled since 2003. The WRF is located within the SRWTP property in Elk Grove. Regional San uses a portion of the recycled water at the SRWTP and the rest is wholesaled to the Sacramento County Water Agency (SCWA). SCWA retails the recycled water, primarily for landscape irrigation use, to select customers in the City of Elk Grove. Regional San currently does not have any planned facilities that could provide recycled water to the proposed project or its vicinity. Additionally, Regional San is not a water purveyor and any potential use of recycled water in the project area must be coordinated between the key stakeholders, e.g. land use jurisdictions, water purveyors, users, and the recycled water producers.

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

Sincerely,

Sarenna Moore

Sarenna Moore Regional San/SASD Policy and Planning

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

Sacramento Regional County Sanitation District (Regional San) August 23, 2017

This letter in response to the Notice of Preparation provides background information regarding the provision of wastewater collection and treatment services to the City of Folsom, The comment raises no environmental issues to be evaluated in the PEIR.

The Draft PEIR includes the relevant setting information contained in the letter in Chapter 19, *Utilities and Service Systems*.







PO Box 1526 • Sacramento, CA • 95812 (916) 444-0022

September 18, 2017

Scott Johnson
Planning Manager, at
City of Folsom, Community Development Department,
50 Natoma Street, Folsom, CA 95630.
generalplan@folsom.ca.us.

RE: Folsom 2035 General Plan NOP

Dear Mr. Johnson,

This letter provides comment from the Environmental Council of Sacramento (ECOS) and Habitat 2020 regarding the Notice of Preparation of and Environmental impact report for the City of Folsom's Draft 2035 General Plan.

The Environmental Council of Sacramento (ECOS), a 501c3 organization, and Habitat 2020, the Conservation Committee of ECOS, are partner coalitions dedicated to protecting the natural resources of the greater Sacramento region while building healthier, more equitable, economically thriving communities. ECOS-Habitat 2020 member organizations include: 350 Sacramento, AARP, Breathe California-Sacramento Emigrant Trails, Friends of Stone Lakes National Wildlife Refuge, International Dark-Sky Association, Los Rios College Federation of Teachers, Mutual Housing California, Physicians for Social Responsibility Sacramento Chapter, Sacramento Citizens' Climate Lobby, Sacramento Electric Vehicle Association, Sacramento Green Democrats, Sacramento Housing Alliance, Sacramento Natural Foods Coop, Sacramento Audubon Society, Sacramento Valley Chapter of the California Native Plant Society, Sacramento Vegetarian Society, Save Our Sandhill Cranes, Save the American River Association, Sierra Club Sacramento Group, Friends of the Swainson's Hawk, and the Sacramento Area Creeks Council.

ECOS and Habitat 2020 respect the City of Folsom's continued planning efforts to improve the city, but we are concerned with the potential urban expansion proposed by the "study areas" outlined in the Preliminary Draft General Plan along Lake Natoma and the American River, and south of White Rock Road. Urbanization of these two areas could pose serious impacts to natural habitat and habitat-connectivity, and we would like to see a full illustration of these impacts in environmental review of the General Plan update.

We are also very concerned about the availability of water for further expansion by the City. Based on previous environmental documentation by the City, we are under the impression that currently approved expansion will fully account for, if not exceed, current water supplies available to the City. As we have made clear in previous comments to the City, we are concerned that there is indeed *not* enough water for build out of Folsom's already approved growth plans.

In environmental review, please illustrate exactly what the source of water would be for further expansion, and how impacts to current residents of the City and the region, as well as to ecological health of the American River, would be avoided.

Finally, we are concerned about the impacts to the region posed by further Folsom expansion with regard to the induced increase of vehicle miles travelled (VMT) inherent in such expansion remote from the City's and region's job centers. Further expansion would not be consistent with the Sacramento Council of Governments' Metropolitan Transportation Plan/Sustainable Communities Strategy and would severely challenge the region's ability to meet mandated greenhouse gas reduction targets. In review, please fully illustrate the impacts of VMT increases in the proposed study areas to climate and air quality, traffic and the region's transportation system, and how those impacts would be mitigated.

Thank you for your consideration and the opportunity to comment. Sincerely,

Brandon Rose

ECOS Board President

Brandon Rose

Rob Burness

Co-Chair, Habitat 2020

Sean Wirth

Co-Chair, Habitat 2020

Environmental Council of Sacramento (ECOS), Habitat 2020, and California Heartland Project September 18, 2017

This letter in response to the Notice of Preparation states the concern of ECOS and its sister organizations with several aspects of the proposed 2035 General Plan regarding the proposed River District Overlay, Corporation Yard Special Study Area, and Planning Area 2, south of White Rock Road. The comment indicates concerns with the effects of urban development in these areas on natural habitat and habitat connectivity. The comment additionally questions whether the water supply available to the City is adequate to support urban expansion beyond the existing City limits. The comment states that increased vehicle miles travelled from new growth areas should be evaluated in the PEIR.

For an evaluation of the consistency of the three identified areas with the management and/or general plans of agencies with jurisdiction over all or portions of the proposed areas encompassed by the River District Overlay, Corporation Yard Special Study Area, and Planning Area 2, refer to Draft PEIR Chapter 4, Land Use, Population, and Housing, Chapter 16, Public Services and Recreation Resources, and Chapter 20, Alternatives Analysis. For an evaluation of the water supply available to the city and its reliability, see Chapter 19, Utilities and Service Systems. For an assessment of induced growth in these areas, see Chapter 4, Land Use, Population, and Housing and Chapter 20, Alternatives Analysis.



September 18, 2017

Scott Johnson, City of Folsom Planning Manager City of Folsom 50 Natoma Street Folsom, CA 95630

Regarding: Comments on Folsom 2035 General Plan NOP

Dear Mr. Johnson,

Friends of Lakes Folsom and Natoma (FOLFAN) is a nonprofit cooperating association in contract with the Department of Parks and Recreation (State Parks) with a mission to is to enhance education and recreation opportunities for the public and to protect the wonders and resources of Lakes Folsom and Natoma.

In reviewing the Folsom 2035 General Plan NOP, we found that the Land Use Element includes a River District Overlay designation, which includes lands owned and operated by the Bureau of Reclamation and State Parks. These lands are not governed by the City of Folsom, but by State and Federal guidelines, the Folsom Lake SRA General Plan and a 25-year contract between the two.

Therefore we feel that it is misleading and inappropriate to present plans for a River District Overlay which is not under the jurisdiction of the City of Folsom. The goals of developing a vision for the River District, a River District Master Plan and enhancing uses in support of local businesses and commerce gives the impression that the City of Folsom controls this land and its uses.

While coordination between State Parks and the City of Folsom is possible on projects that fit the scope of the Folsom Lake SRA General Plan, we believe that the current draft should explicitly state that coordination with and approvals from State Parks and the Bureau of Reclamation are required for any projects in the River District Overlay that include state and federal lands along Lake Natoma.

If you have any questions about these comments, please contact Linda McDonald at (916)716-7825. I hope this is helpful.

Sincerely,

Linda McDonald, President

Friends of Lakes Folsom & Natoma (FOLFAN) September 18, 2017

This letter in response to the Notice of Preparation states concerns regarding the proposed River District Overlay, and potential conflicts with the Folsom Lake Recreation Area General Plan/Resource Management Plan and with the policies and regulations of State and federal agencies managing lands within the FLSRA. The comment requests that the 2035 General Plan be modified to acknowledge the jurisdictional authority of the California Department of Parks and Recreation and the U.S. Bureau of Reclamation.

The City will consider the policy requests of FOLFAN in its review and processing of the 2035 General Plan. For an evaluation of the proposed 2035 General Plan's consistency with the adopted plans and policies of public agencies with jurisdiction over resources and lands within and adjacent to the 2035 General Plan planning area, refer to Chapter 4, *Land Use, Population, and Housing*, Chapter 16, *Public Services and Recreation Resources*, and Chapter 20, *Alternatives Analysis*, of the Draft PEIR.

From: Loretta Hettinger [mailto:loretta@shaunv.com]

Sent: Monday, September 18, 2017 10:58 AM To: Scott Johnson <sjohnson@folsom.ca.us>;

Pam Johns <pjohns@folsom.ca.us>

Subject: General Plan EIR Scoping

Heritage Preservation League requests that the General Plan EIR evaluate

- 1) use of the Southern Pacific rail corridor for transportation and
- the effect of parking policies on residential quality of life in areas in proximity to transit nodes, identified urban centers and other concentrations of commercial use.

The Palladio urban center was designed with separation of the residential and commercial uses, but the Historic District's grid street layout and its uneven distribution of parking spaces in the commercial area raise questions about whether the General Plan adequately protects residential quality of life. Similarly, the General Plan needs to adequately protect residential quality of life for the replanning of East Bidwell's original central business district vicinity.

Scott, thank you for your phone call last week. I appreciate your clarification that you still expect changes to be made in the General Plan text. HPL is working on the specific items Chelsey asked us to help with, and we do plan to pursue some of the other changes we requested that have not yet been made.

Please reply to this e-mail so I can be sure I successfully transmitted it.

Loretta Hettinger 916-990-0719 home 916-591-0781 cell Heritage Preservation League September 18, 2017

This letter in response to the Notice of Preparation requests that the PEIR evaluate:

- Use of the Southern Pacific rail corridor for transportation; and
- The effect of parking policies on residential quality of life in areas in proximity to transit nodes, identified urban centers and other concentrations of commercial use.

With respect to the use of the Southern Pacific rail corridor for transportation, the purpose of an EIR is neither to recommend approval nor denial of a project. An EIR is an informational document used in the planning and decision-making process by the lead agency and responsible and trustee agencies. An EIR describes the significant environmental impacts of a project, potentially feasible measures to mitigate significant impacts, and potentially feasible alternatives to the project that can reduce or avoid significant environmental effects. Thus, this proposed policy is most appropriately dealt with in the City's review of the draft 2035 General Plan. The City will consider the policy request to use the rail corridor for transportation purposes in its review and processing of the 2035 General Plan. Proposed Policy M 1.1.1, Historic Southern Pacific Rail Right-of-Way, in the Mobility Element of the 2035 General Plan draft addresses the substance of this comment.

Regarding the residential quality of life, the Draft PEIR evaluates the potential local visual quality, air quality, noise, and traffic effects of implementing the draft 2035 General Plan in Chapter 6, Aesthetics and Visual Quality, Chapter 8, Air Resources, Chapter 15, Noise and Vibration, and Chapter 17, Transportation and Circulation. Together, these components influence the quality of life for surrounding residents. Although no specific impact in the PEIR addresses the aggregate effect of these individual environmental topics, the effect of implementing the 2035 on community cohesion is assessed in Chapter 4, Land Use, Population, and Housing, of the Draft PEIR.

September 15, 2017

Scott Johnson
Planning Manager, Community Development
City of Folsom
50 Natoma Street
Folsom, CA 95630
sjohnson@folsom.ca.us

RE: General Plan 2035 Draft EIR

Thank you for meeting with me on September 13, 2017 to discuss my concerns and hopes regarding the General Plan update. Following is a summary of my concerns and I am hoping to see them fully addressed in the next steps of this process.

- 1) The City of Folsom, along with other California municipalities, has an obligation to meet the requirements of SB 375 CA, the Sustainable Communities Act of 2008. To that end, I believe it is extremely important that we pursue methods of reducing greenhouse gas (GHG) production with comprehensive policies which include but are not be limited to:
 - a. Reducing vehicle miles traveled. Incentivizing and implementing the use of public or shared transport with electric buses or smaller shuttles to and from major shopping centers, workplaces and light rail.
 - b. Improving connectivity of our major arterials and "feeder" streets by incorporating grids or additional major arterial connections wherever possible.
 - c. Reducing heat islands by drastically reducing the number of large asphalt parking lots and massive structures with inadequate green coverage.
 - d. Improving upon our tree canopy in already impacted "heat island" areas.
 - e. A full examination of our current GHG production with defined projects that will stabilize and eventually reduce future GHG production should be included.
- 2) A detailed evaluation of our water supply must be undertaken to understand the impacts of future drought and the possibility of limited "savings" by current and future residents.
- 3) Addressing the environmental impact of incorporating a "river district" into the general plan should be considered at this time. There is great potential for significant deterioration of the existing biodiversity along the lake frontage if it is altered to accommodate higher and more diverse use.

Sincerely,

Barbara Leary 128 Yankton St. Folsom, CA 95630 (916) 947-9270 Leary, Barbara September 15, 2017

This letter in response to the Notice of Preparation requests that the PEIR evaluate the following issues:

- Climate change and greenhouse gas emissions reductions
- Water supply
- The environmental effects of the River District Overlay

For an evaluation of the consistency of the River District Overlay with the management and/or general plans of agencies with jurisdiction over all or portions of the prosed area encompassed by the River District Overlay, refer to Draft PEIR Chapter 4, *Land Use, Population, and Housing*, Chapter 16, *Public Services and Recreation Resources*, and Chapter 20, *Alternatives Analysis*. For an evaluation of the water supply available to the city and its reliability, see Chapter 19, *Utilities and Service Systems*. For an assessment of global climate change and greenhouse gas emissions, see Chapter 12, *Global Climate Change*.



Save the American River Association

8836 Greenback Lane, Suite C • Orangevale, CA 95662 916-936-4555 • E-mail: info@SARAriverwatch.org • www.SARAriverwatch.org

2017 Board of Directors

Officers

Stephen Green, President

Warren Truitt, Vice Pres. Mary Beth Metcalf, Treasurer

Alan Wade, Secretary/Past Pres.

Directors

Kelly Cohen

John Cox

Elke Guenter

Joseph Klun

Jim Morgan

George Nyberg

Felix Smith Betsy Weiland

Dan Winkelman

Volunteers & Staff Sara Stephens, Office Mgr.

Advisory Council

Dan Bacher

Anne Baron

John Barris

Katie Baygell

Dave Clark

Maxine Clark

Illa Collin

Al Freitas

Guy Galante

Jane Hagedorn

Burt Hodges

Callie Hurd

Gary Kukkola Pam Lapinski

Joseph Larzaiere

Dave Lydick

Clyde Macdonald, Past Pres.

Randy Smith

Dale Steele Ron Stork

Ron Suter

David Thesell

September 18, 2017

Via electronic mail and regular mail

Scott Johnson, Planning Manager

City of Folsom, Community Development Department

50 Natoma Street

Folsom, California 95630

Subject: Notice of Preparation of a Draft Environmental Impact Report for the

Folsom 2035 General Plan

Dear Mr. Johnson:

Save The American River Association (SARA) was founded in 1961 to establish the American River Parkway. SARA continues today, as we have for the past 55 years, to be the lead voice and advocate protecting the natural and recreation values of the Lower American River and Parkway. We appreciate the opportunity to comment on the proposed River District Overlay as a part of Folsom's 2035 General Plan.

The River District Overlay provides no detail regarding future development, other than to say that "This overlay designation applies to the riverfront areas of Folsom, which are envisioned to be enhanced during the life of the General Plan. The General Plan calls for the preparation of a River District Master Plan for the River District Overlay area, to set a vision and implementation plan for enhancing and improving access to Folsom's riverfront." (Notice of Preparation - Folsom 2035 General Plan, Page 13).

Any General Plan planning and implementation process must be internally consistent with existing state laws governing Lake Natoma and the Folsom Lake State Recreation Area. In fact, a stated City objective in preparing the Folsom 2035 General Plan is to "Adopt a General Plan that complies with state law." (Notice of Preparation – Folsom 2035 General Plan, Page 9)

The applicable state law includes, but is not limited to, The Urban American River Parkway Preservation Act (Public Resources Code Section 5840 et. seq). It defines the American River Parkway as the same area as described in the American River Parkway Plan 2008. It describes the American River Parkway as extending from Folsom Dam to the confluence of the American and Sacramento Rivers. The American River Parkway Plan 2008 also references the Folsom Lake State Recreation Area General Plan/Resource Management Plan 2009. (American River Parkway Plan 2008, Chapter 10, Area Plans, Page 204). Any proposed River District Master Plan must conform to the requirements and procedures of the American River Parkway Plan 2008, and the Folsom Lake State Recreation Area General Plan/Resource Management Plan 2009, as the Master Plan relates to changes in Land Use designations, Area Plans, and Policies.

Furthermore, the State of California's Urban American River Parkway Preservation Act provides for the following:

- "The Legislature hereby adopts the American River Parkway Plan so as to provide coordination with local agencies in the protection and management of the diverse and valuable natural land, water, native wildlife, and vegetation of the American River Parkway.
- Actions of state and local agencies with regard to land use decisions shall be consistent with the American River Parkway Plan..." (Public Resources Code Section 5842)

Also, under the California Public Resources Code, State Recreation Areas are "selected and developed to provide multiple recreational opportunities to meet other than purely local needs..." (PRC § 5002.2 (b))

How the DEIR deals with the details of a River District Overlay and subsequent Master Plan and the requirement of a jurisdiction's General Plan to show internal consistency with applicable state laws, will be of great interest and concern to SARA and citizens throughout the Sacramento region.

Sincerely,

Detry Welland
Betsy Weiland

Land Use Chairperson

Save The American River Association

cc: Board of Directors, Save The American River Association

Advisory Council, Save The American River Association

Lisa Mangat, Director, California State Parks and Recreation

Richard Preston, Folsom Sector Superintendent, Gold Fields District, California State Parks and Recreation

California State Parks and Recreation Commission

Sue Frost, District 4, Sacramento County Board of Supervisors

Bill Craven, Chief Consultant, Senate Natural Resources and Water Committee

Save the American River Association (SARA) September 18, 2017

This letter in response to the Notice of Preparation states concerns regarding the proposed River District Overlay, and potential conflicts with the Folsom Lake Recreation Area General Plan/Resource Management Plan, the American River Parkway enabling legislation and the American River Parkway Plan, and the policies and regulations of the local, State, and federal agencies managing lands within the FLSRA and the American River Parkway.

For an evaluation of the proposed 2035 General Plan's consistency with the adopted plans and policies of public agencies with jurisdiction over resources and lands within and adjacent to the 2035 General Plan planning area, refer to Chapter 4, *Land Use, Population, and Housing*, Chapter 16, *Public Services and Recreation Resources*, and Chapter 20, *Alternatives Analysis* of the Draft PEIR.

This page intentionally left blank.