

APPENDIX B

NOP AND COMMENTS RECEIVED ON THE NOP



County of Sacramento
Environmental Review and Assessment
827 7th Street, Room 220 Sacramento, CA 95814
ph. (916) 874-7914 fax (916) 874-8343

NOTICE OF PREPARATION

Date: Tuesday December 10, 2002

To: _____ **From:** County of Sacramento
Environmental Review and
Assessment
827 7th Street, Room 220
Sacramento, CA 95814

Subject: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT
REPORT

DERA Contact: Robert Caikoski (916) 874-7914

Sacramento County Water Agency (SCWA) as the CEQA Lead Agency will have prepared a DEIR for the project identified below. We need to know the views of interested persons as to the scope and content of the environmental information to be included in the DEIR. Agencies should comment on the scope and content of the environmental information that is germane to the agencies' statutory responsibilities in connection with the proposed project.

The project description, location, and the probable environmental effects are contained in the attached materials.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but not later than 30 days after receipt of this notice.

Please send your response to Dennis Yeast, Environmental Coordinator at the address shown above. We will need the name for a contact person in your agency.

Project Proponent:

Sacramento County Water Agency
827 7th Street, Room 301
Sacramento, CA 95814
(916) 874-6851

Project Title:

2002 ZONE 40 WATER SUPPLY MASTER PLAN

Control Number:

02-PWE-0774

Project Location:

The project is located in the southeastern portion of Sacramento County. The entire Zone 40 area consists of 82,250 acres. The proposed 2002 Zone 40 Water Supply Master Plan (WSMP) applies to the 2030 planning horizon study area (study area), which consists of approximately 46,620 acres. The proposed project extends from west central Sacramento County near Interstate 5 to east central Sacramento County in the vicinity of Douglas Boulevard and Grantline Road (Plate A).

Project Description:

The Sacramento County Water Agency (SCWA) proposes to adopt the 2002 Zone 40 Water Supply Master Plan (WSMP) for the Zone 40 area. The WSMP is a program level document that identifies the facilities needed to implement a phased water supply program to meet the water needs within the Zone 40 study area through the year 2030. The overall goal of the 2002 Master Plan is to provide conjunctive use of local groundwater and surface water supplies by constructing a water treatment plant, a new surface water diversion structure, water conveyance pipelines and groundwater treatment, and extraction and distribution facilities. These facilities would be used for the production, conservation, transmission, distribution and wholesale and retail sale of surface water and groundwater in the Zone 40 area.

The primary objective of the 2002 Master Plan is to provide a flexible plan of water management options, which can be implemented and revised as conditions that affect the availability and feasibility of water supply sources change in the future. The 2002 Master Plan reflects the estimated pattern of 2030 water demands determined by the adopted land use plan, treatment for water quality, adoption of the Sacramento Area Water Forum Agreement, and availability of groundwater and surface water supplies.

Water demand projections for the Zone 40 study area are based on unit demand factors expressed in acre-feet of water used annually per acre of land. In the Sacramento County Central Groundwater Basin where the Zone 40 study area is located, the recommended long-term average pumping yield established by the Water Forum Agreement is 273,000 AFA. The estimated water demand for the expanded Zone 40 study area is anticipated to be approximately 113,000 acre-feet annually (AFA) by 2030, assuming 25.6% conservation. According to the proposed WSMP, post year 2000 water demand would be met by varying amounts of the mixed use of groundwater, surface water, water conservation and treated wastewater (reclaimed water), based on the hydrologic conditions each year. On average, surface water is expected to account for more than half of the total water demand, and will be delivered through future diversions from near the mouth of the American River or from the Sacramento River. The difference between the demand and the amount of available surface and reclaimed water is assumed to be the total groundwater need. The proposed use of groundwater within the Zone 40 study area is based on the

recommended safe groundwater yield established by the various stakeholder groups in the Sacramento Area Water Forum Process. The average annual groundwater yield is determined to be below the maximum sustainable yield set by the Sacramento Area Water Forum Process to permit flexibility for the changing hydrologic conditions each year.

Zone 40 surface water supplies are proposed to be existing Central Valley Project (CVP) contract water, surface water entitlement transfers from Sacramento Municipal Utility District (SMUD), appropriative water rights for the use of "winter water," and other water transfers including use of unused surface water from water districts located in the American River and North Sacramento River basins, and the use of remediated groundwater that is discharged into local tributaries of the American River. Currently, three water purveyors provide retail water service within the expanded Zone 40 service area boundary: the SCWA Zone 41 (formerly the Sacramento County Water Maintenance District), Florin Resources Conservation District/Elk Grove Water Service (Florin Resource/EGWS), and the California-American Water Company (Cal-American). It is assumed that these water providers would purchase wholesale water supplies from Zone 40 to serve new growth areas.

The County's future facilities planning within Zone 40 is based on meeting needs during three hydrologic year types: average year, wet year and dry year. The Zone 40 area will continue to use groundwater; however, conveyance of surface water is proposed to supply the area when surface water supplies are plentiful. To meet surface water needs in the study area, three alternatives for surface water diversions and treatment options are under consideration: a SCWA Freeport Water Treatment Plant (WTP) Project, a Freeport Regional Diversion Project, and a Sacramento River Water Treatment Plant Joint Project. The SCWA Freeport WTP Project would construct a diversion structure on the Sacramento River near the community of Freeport, an 85 mgd surface water treatment facility near the SRWTP's Bufferlands, and the necessary conveyance pipelines to deliver treated water to retail service areas. In the Freeport Regional Diversion Project, SCWA and East Bay Municipal Utilities District (EBMUD) would construct a diversion structure on the Sacramento River near the community of Freeport, and SCWA would construct an 85 mgd (ultimate capacity) surface water treatment facility in the central portion of Zone 40 and the necessary conveyance pipelines to deliver treated water to retail service areas. In the Sacramento River WTP Joint Project, SCWA would purchase 80 mgd of dedicated treatment plant capacity from the City of Sacramento and construct dedicated conveyance pipelines through the City of Sacramento to deliver treated water to retail service areas.

Groundwater wells, main transmission pipelines, injection wells, groundwater treatment and storage facilities, and the use of reclaimed water are needed in addition to the proposed surface water diversion and treatment facilities to complete the conjunctive use water supply system for the Zone 40 study area. Groundwater extraction and treatment plants would be constructed at strategic locations in the Zone 40 area to supplement surface water.

The proposed Zone 40 WSMP includes a financing plan that will provide sufficient funding for the construction of capital facilities identified in the plan as necessary to meet the projected 2030 demands. Funding sources will consist of development fees and user surcharges.

Environmental/Land Use Setting:

Topography of the Zone 40 study area is generally flat with a gradual up slope to the east. The study area within Zone 40 includes approximately 46,620 acres and consists primarily of existing and developing residential, industrial, commercial, and office land uses as well as some rural land uses including large and small farm operations, agriculture residences, and other limited residential land uses as identified on the Sacramento County General Plan Land Use Diagram. The majority of land within the Zone 40 study area is within the Sacramento County General Plan Urban Policy Area. The Zone 40 study area is entirely located within the Sacramento County General Plan Urban Service boundaries. The City of Elk Grove and portions of the newly formed City of Rancho Cordova lie within the Zone 40 study area.

Probable Environmental Effects:

The focus of the DEIR is to identify the probable environmental effects as a result of the project. The overall impact analysis will evaluate biological resources (including impacts to Cosumnes River), land use, aesthetics, air quality, noise, traffic (construction related impacts), cultural resources, geology and soils, public health and safety, hydrology, water quality, groundwater, and utilities and service systems. The analysis will identify significant unavoidable effects, cumulative impacts and growth-inducing impacts as they pertain to the alternatives.

Intended Uses of the EIR:

The Sacramento County Water Agency will use the EIR to consider the environmental effects, mitigation measures, and alternatives in the process of rendering a decision to approve or deny the proposed Water Supply Master Plan. The EIR will serve as an information document for the general public as well. Responsible agencies may also use the EIR as needed for subsequent discretionary actions.

BY: [Original Signature On File]

Dennis E. Yeast
Environmental Coordinator



Gray Davis
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse



Tal Finney
Interim Director

Notice of Preparation

December 13, 2002

To: Reviewing Agencies

Re: 2002 Zone 40 Water Supply Master Plan
SCH# 2002122068

Attached for your review and comment is the Notice of Preparation (NOP) for the 2002 Zone 40 Water Supply Master Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Dennis Yeast
Sacramento County
827 7th Street, Room 220
Sacramento, CA 95814**

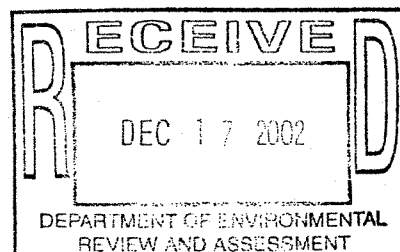
with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Gregoria Garcia
Project Analyst, State Clearinghouse

Attachments
cc: Lead Agency



**Document Details Report
State Clearinghouse Data Base**

SCH# 2002122068
Project Title 2002 Zone 40 Water Supply Master Plan
Lead Agency Sacramento County

Type NOP Notice of Preparation
Description The proposed project consists of adopting a Water Supply Master Plan for the Zone 40 area.

Lead Agency Contact

Name Dennis Yeast
Agency Sacramento County
Phone (916) 874-7914 **Fax**
email
Address 827 7th Street, Room 220
City Sacramento **State** CA **Zip** 95814

Project Location

County Sacramento
City
Region
Cross Streets
Parcel No.

Township	Range	Section	Base
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Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use Urban Land Use

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Geologic/Seismic; Noise; Public Services; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Health Services; Department of Fish and Game, Region 2; Native American Heritage Commission; State Lands Commission; Caltrans, District 3; California Highway Patrol; Air Resources Board, Major Industrial Projects; State Water Resources Control Board, Division of Water Rights; Department of Toxic Substances Control; Regional Water Quality Control Bd., Region 5 (Sacramento); Caltrans, Division of Transportation Planning

Date Received 12/13/2002 **Start of Review** 12/13/2002 **End of Review** 01/13/2003

NOP Distribution List

County: *Sacramento*

SCH# *2002122068*

Resources Agency	Fish and Game	Health & Welfare	Food & Agriculture	Other
<input type="checkbox"/> Resources Agency Nadell Gayou	<input type="checkbox"/> Dept. of Fish & Game Scott Flint Environmental Services Division	<input type="checkbox"/> Dept. of Health/Drinking Water	<input type="checkbox"/> Food & Agriculture Suzie Shaffer Dept. of Food and Agriculture	<input type="checkbox"/> State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality
<input type="checkbox"/> Dept. of Boating & Waterways Suzi Belzler	<input type="checkbox"/> Dept. of Fish & Game 1 Donald Koch Region 1	<input type="checkbox"/> Wayne Hubbard	<input type="checkbox"/> State Water Resources Control Board Mike Falkenstein Division of Water Rights	<input checked="" type="checkbox"/> Dept. of Toxic Substances Control CEQA Tracking Center
<input type="checkbox"/> California Coastal Commission Elizabeth A. Fuchs	<input checked="" type="checkbox"/> Dept. of Fish & Game 2 Banky Curtis Region 2	<input type="checkbox"/> Dept. of Health/Drinking Water	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)	<input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1)
<input type="checkbox"/> Dept. of Conservation Roseanne Taylor	<input type="checkbox"/> Dept. of Fish & Game 3 Robert Floerke Region 3	<input type="checkbox"/> Health & Welfare	<input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input type="checkbox"/> Dept. of Forestry & Fire Protection Allen Robertson	<input type="checkbox"/> Dept. of Fish & Game 4 William Laudermilk Region 4	<input type="checkbox"/> Wayne Hubbard	<input type="checkbox"/> RWQCB 4 Jonathan Bishop Los Angeles Region (4)	<input checked="" type="checkbox"/> RWQCB 5S Central Valley Region (5)
<input type="checkbox"/> Office of Historic Preservation Hans Kreuzberg	<input type="checkbox"/> Dept. of Fish & Game 5 Don Chadwick Region 5, Habitat Conservation Program	<input type="checkbox"/> Health & Welfare	<input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office
<input checked="" type="checkbox"/> Dept. of Parks & Recreation B. Noah Tilghman Environmental Stewardship Section	<input type="checkbox"/> Dept. of Fish & Game 6 Gabrina Gatchel Region 6, Habitat Conservation Program	<input type="checkbox"/> Health & Welfare	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office
<input type="checkbox"/> Reclamation Board Pam Bruner	<input type="checkbox"/> Dept. of Fish & Game 6 I/M Tammy Allen Region 6, Inyo/Mono, Habitat Conservation Program	<input type="checkbox"/> Health & Welfare	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)
<input type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve McAdam	<input type="checkbox"/> Dept. of Fish & Game M Tom Napoli Marine Region	<input type="checkbox"/> Health & Welfare	<input type="checkbox"/> RWQCB 9 San Diego Region (9)	
<input checked="" type="checkbox"/> Dept. of Water Resources Resources Agency Nadell Gayou	<input type="checkbox"/> Independent Commissions	<input type="checkbox"/> Health & Welfare		
<input type="checkbox"/> Health & Welfare Wayne Hubbard	<input type="checkbox"/> California Energy Commission Environmental Office	<input type="checkbox"/> Health & Welfare		
<input type="checkbox"/> Dept. of Health/Drinking Water	<input type="checkbox"/> Native American Heritage Comm. Debbie Treadway	<input type="checkbox"/> Health & Welfare		
<input type="checkbox"/> Food & Agriculture	<input type="checkbox"/> Public Utilities Commission Ken Lewis	<input type="checkbox"/> Health & Welfare		
<input type="checkbox"/> Dept. of Food and Agriculture	<input type="checkbox"/> State Lands Commission Betty Silva	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Governor's Office of Planning & Research State Clearinghouse Planner	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Dept. of Transportation 10 Tom Dumas District 10	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Dept. of Transportation 11 Bill Figge District 11	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Dept. of Transportation 12 Bob Joseph District 12	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Business, Trans & Housing	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Housing & Community Development Cathy Creswell Housing Policy Division	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Caltrans - Division of Aeronautics Sandy Hesnard	<input type="checkbox"/> Health & Welfare		
	<input checked="" type="checkbox"/> California Highway Patrol Lt. Julie Page Office of Special Projects	<input type="checkbox"/> Health & Welfare		
	<input checked="" type="checkbox"/> Dept. of Transportation Ron Helgeson Caltrans - Planning	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Dept. of General Services Robert Sleppy Environmental Services Section	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Airport Projects Jim Lerner	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Transportation Projects Kurt Karperos	<input type="checkbox"/> Health & Welfare		
	<input checked="" type="checkbox"/> Industrial Projects Mike Tollstrup	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> California Integrated Waste Management Board Sue O'Leary	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> State Water Resources Control Board Diane Edwards Division of Clean Water Programs	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Colorado River Basin Region (7)	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> Santa Ana Region (8)	<input type="checkbox"/> Health & Welfare		
	<input type="checkbox"/> San Diego Region (9)	<input type="checkbox"/> Health & Welfare		



California Regional Water Quality Control Board

Central Valley Region



Winston H. Hickox
Secretary for
Environmental
Protection

Sacramento Main Office
Internet Address: <http://www.swrcb.ca.gov/~rwqcb5/home.html>
3443 Routier Road, Suite A, Sacramento, California 95827-3003
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Gray Davis
Governor

17 December 2002

Mr. Dennis Yeast
County of Sacramento
Department of Environmental Review and Assessment
827 7th Street, Room 301
Sacramento, CA 95814

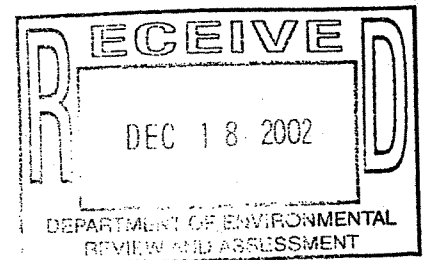
**NOTICE OF PERPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
2002 ZONE 40 WATER SUPPLY MASTER PLANT (Control No. 02-PWE-0074)**

Thank you for the opportunity to comment on the proposed preparation of a revised draft environmental impact report. In brief, Regional Board staff would like to see the report contain an analysis of the following:

1. The impact of the proposed water supply projects on groundwater remediation projects in Zone 40;
2. The impact by groundwater remediation projects on the available groundwater supply for Zone 40;
3. Reuse options for contaminated groundwater that has been treated to remove the contaminants, including means or, and time frames for, implementation; and
4. Water conservation measures and means of implementation.

If you have any questions regarding this matter, please call me at (916) 255-3025.

ALEXANDER MACDONALD
Senior Engineer



DRAFT DRAFT DRAFT

December 27, 2002

Mr. Dennis Yeast
Dept of Environmental Review and Assessment
County of Sacramento
827 7th Street, Room 220
Sacramento, CA 95814

Re: Notice of Preparation, Zone 40 Water Supply Master Plan

Dear Dennis:

We have reviewed the Notice of Preparation and offer the following comments:

1. Our concerns remain substantially as articulated in our July 20, 2001 letter of comment on the Sunridge DEIR and North Vineyard Wellfield NOP, attached. Please consider those comments as applicable to this NOP as well.
2. It is important that the water supply master plan DEIR address direct and indirect cumulative impacts of groundwater extraction at current and anticipated expanded rates, using a baseline for that analysis that allows an accurate portrayal of the consequences of continued groundwater pumping at current levels compared to historic conditions.
3. To the extent that the document relies upon prior water planning documents (eg. The Water Forum Agreement and its EIR) as support for pumping at current or expanded rates, please provide specific reference to the supporting analysis and include that analysis whenever practical to do so. The document should explain, and present the analyses underlying, the evolution from the 1994 General Plan's use of 357,000 AF/yr as a Countywide "safe yield" estimate to current assumptions.
4. Sacramento County's piecemeal and incremental approach to Central Area water supply planning have left key stakeholders confused about the status of planning for urban supply, for water supply to replace wells closed by contamination, and about the status of particular proposed projects such as the North Vineyard Wellfield. Since the water supply DEIR provides an important opportunity for public involvement in and informed debate about future water management in Central Sacramento County, it is important that this document present a clear "roadmap" to water supply planning activities, including a clear and detailed explanation of the status of various projects and relationship to each other, and the status and relationship of documents such as the County Water Plan, Zone 40 Master Plan, Freeport Project EIR,

“Master Water Plan,” and others, and their relationship in turn to processes such as the Water Forum and the Central Area Groundwater Negotiation. For similar reasons, we urge that phrases such as “safe groundwater yield” and “sustainable groundwater yield” be clearly defined and consistently used.

5. We suggest that the document also include an update on Sacramento County General Plan Conservation Element Policy 20 (“CO-20,” which requires that new development be served by new surface water supplies) and its implementation. It is our understanding that, as currently interpreted and implemented, CO-20 is being applied only to new development that occurs on historically non-irrigated soils. This appears to be at variance with the plain language of the County General Plan, which stresses that CO-20 “applies to all new commercial and residential development” in “areas previously identified for non-urban uses that are within the Urban Area established by this Plan” as a means for reducing groundwater use and moving toward “safe yield.” We suggest that the DEIR include an analysis of the consistency of the Zone 40 Master Plan with the General Plan, include as at least one alternative a scenario of compliance with the General Plan, and either evaluate the environmental effects of the policy as currently being implemented (which include ongoing “overdraft” – as defined in the General Plan – and the establishment of an incentive to urbanize prime and significant farmland rather than unirrigated land) or identify and summarize where that evaluation has been carried out.
6. If the County determines that cumulatively significant direct or indirect environmental impacts are a potential result of ongoing and expanded groundwater pumping, the document should include both mitigation measures that address these impacts and project design alternatives that avoid these impacts. In particular, since this document will support a policy decision about whether and how to proceed to design and implement a conjunctive use program for the Central Area, fundamentally different alternative approaches to groundwater recharge, storage, and extraction should be presented and evaluated. In particular, we believe that the following strategies merit consideration as components of a conjunctive use program:
 - Use of natural waterways for recharge using new supplies;
 - Development of “in lieu” recharge agreements with agricultural pumpers (as required by County General Plan Conservation Policy 19);
 - Programmatic coordination with the Southeast Sacramento County Agricultural Water Authority and the Omochumne-Hartnell Water District;
 - Protection and expansion of natural recharge areas.
7. As Sacramento County seeks, through the proposed conjunctive use program and Freeport Diversion, to increase its reliance on out-of-County and non-American River sources of water, the County will face an increasing need to

demonstrate that its water planning and long term management policies and programs are compliant with relevant provisions of federal law, including the Endangered Species Act, the salmon population restoration policies of the CVPIA, and others. The DEIR should present and discuss the County's plans for compliance with federal review and substantive policy requirements and discuss how threatened and endangered species considerations will be integrated into future planning by the County.

Similarly, in the "Zone 40 Biological Opinion," dated March 11, 1999, Sacramento County made broad commitments to plan and manage for the protection of a range of threatened and endangered species, as a condition for receipt of contract water from the US Bureau of Reclamation. Since these commitments are applicable to current planning and future operation of County water supply facilities and represent an important planning framework, the Master Plan DEIR should provide a summary of the Biological Opinion and a status report on its implementation.

8. The NOP does not make clear the significance of the distinction between Zone 40 and the more limited "study area" proposed to be the focus of the DEIR. We assume that the geographic scope of the DEIR will be sufficiently broad to encompass the area impacted by groundwater pumping and all potential solutions. At a minimum, the "Groundwater Influence Zone" defined in the Biological Opinion (Figure 1) is the appropriate area for consideration of impacts and alternative solutions.

We look forward to review of the DEIR.

Sincerely,

Mike Eaton
Director, Cosumnes River Project

DEPARTMENT OF TRANSPORTATION

DISTRICT 3 - Sacramento Area Office

Venture Oaks - MS 15

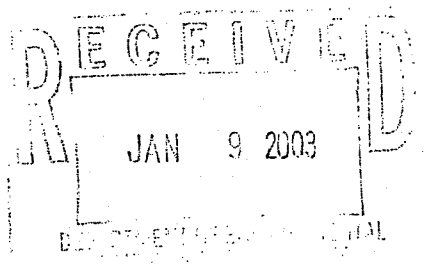
P.O. Box 942874

Sacramento, CA 94274-0001

PHONE (916) 274-0638

FAX (916) 274-0648

TTY (530) 741-4509

*Flex your power!
Be energy efficient!*

January 6, 2003

02SAC0154

03-SAC- VARIOUS

2002 Zone 40 Water Supply Master Plan

Notice of Preparation

SCH#2002122068

Mr. Dennis Yeast

County of Sacramento

Department of Environmental Review and Assessment

827 Seventh Street, Room 220

Sacramento, CA 95814

Dear Mr. Yeast:

Thank you for the opportunity to review and comment on the 2002 Zone 40 Water Supply Master Plan. Our comments are as follows:

- Any pipeline crossing of State freeway and highway facilities involved with this master plan's water distribution projects will require an encroachment permit. Caltrans should be contacted for a review of each project level proposal for an assessment of impact significance. For permit assistance, please contact Bruce Capaul at (530) 741-4408.

Please provide our office with the future project level information regarding this master plan. If you have any questions regarding these comments, please contact Ken Champion at (916) 274-0615.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Pulverman".

JEFFREY PULVERMAN, Chief
Office of Regional Planning

January 7, 2003

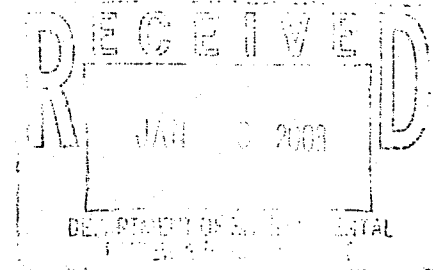
TEL 916 684-2816
FAX 916 683-1702

info@cosumnes.org
www.cosumnes.org

Mr. Dennis Yeast
Dept of Environmental Review and Assessment
County of Sacramento
827 7th Street, Room 220
Sacramento, CA 95814

Re: Notice of Preparation, Zone 40 Water Supply Master Plan

Dear Dennis:



We have reviewed the Notice of Preparation and offer the following comments:

1. In our July 20, 2001 letter of comment on the Sunridge DEIR and North Vineyard Wellfield NOP, we explained why we believe that the County needs to craft a long term water supply plan for the central county area that is "Cosumnes-friendly" and supportive of agriculture. We attached a copy of that letter. Please consider those comments as applicable to this NOP as well.
2. There are highly significant public trust values associated with the ecosystems of the Cosumnes River, its recreational uses, riparian corridor, and associated wetlands and waterways. These values include critical habitats for a range of migratory songbirds, raptors, and other avian species, the salmon fishery, wetlands-dependent species such as giant garter snake and sandhill crane, and other threatened and endangered species. The significance of these values is underscored by the level of public investment (by state and federal agencies and the County of Sacramento) in the corridor. These public trust values have been impaired by historic and ongoing groundwater pumping and will be further impaired if the rate of groundwater extraction continues at present levels or increases. The public trust doctrine requires the County's plan for water supply and groundwater management to provide for restoring and maintaining these public trust values, separate from and independent of its responsibilities under CEQA.
3. The document should make clear the scope and function of the DEIR's analysis of groundwater pumping impacts. In July 2001 meetings, County (DERA and Water Agency) and Water Forum staff acknowledged that the Water Forum Agreement EIR did not evaluate the environmental impacts of increased and cumulative historic groundwater pumping (except on the American River) on important natural values and farmlands and agreed that the County needed to address this deficiency. We have assumed that the Zone 40 Master Plan EIR process would perform this function at a sufficient level of detail to provide programmatic

support for decisions on additional municipal pumping in the Central County area. The NOP is not clear on this point. The DEIR itself should be explicit as to the extent and limits of its intended scope and use.

If the County intends for the analysis in the master plan to meet (or assist in meeting) CEQA compliance requirements for expanded pumping in the central county area, we have these concerns:

- The analysis should address direct and indirect cumulative impacts of groundwater extraction at current and anticipated future rates, using a baseline for that analysis that allows an accurate portrayal of the consequences of continued groundwater pumping at current levels compared to historic conditions.
 - It should use worst-case assumptions about the timing of the implementation of the Freeport Project and the County's ability to secure and retain future contracts for surface water.
 - It should use appropriate assumptions about retired agricultural pumping, as discussed below.
 - It should address impacts on agriculture and the direct and indirect environmental and socioeconomic implications of increased pumping costs for the agricultural sector. These concerns were important in the Board of Supervisor's identification (in the 1994 General Plan) of 357,000 acre-feet per year as a County-wide "safe yield" ceiling. If the Zone 40 DEIR is intended to support a change in County policy, it needs to give full consideration to these issues.
4. The status of planning for urban water supply in the Central Area, for water supply to replace wells closed by contamination, and of particular proposed projects such as the North Vineyard Well Field is confusing to stakeholders and the general. Since the Zone 40 water supply DEIR provides an important opportunity for public involvement in and informed debate about future water management in Central Sacramento County, the DEIR should present a clear "roadmap" to related water supply planning and development activities, including a detailed explanation of a) the status of various projects and relationship to each other, and b) the status and relationship of documents such as the County Water Plan, Zone 40 Master Plan, "Master Water Plan," County General Plan, and others, and their relationship in turn to processes such as the Water Forum and the Central Area Groundwater Negotiation.

To the extent that the Master Plan EIR relies upon prior water planning documents as policy or analytical support for pumping of groundwater at current or expanded rates, please provide specific reference to the supporting analysis and include that analysis whenever practical to do so.

The document should explain and present the analyses underlying the dramatic change from the 1994 General Plan's determination that County-wide "safe yield"

is 357,000 acre-feet per year to current planning assumptions. The 1994 General Plan determined that the County was experiencing “considerable overdraft problems,” established a goal of eliminating overdraft by the year 2000, and committed to interim policies to keep the overdraft problem from becoming worse. The General Plan and its EIR, in contrast to the Water Forum Agreement and its EIR, considered a broad range of environmental and socioeconomic issues over a relevant geographic scope. The DEIR should explain the County’s current view of the relevance of these General Plan policies. Are they currently applicable to County actions? If not, why not? If the Zone 40 EIR is also intended to provide CEQA support for a General Plan amendment, it should do so explicitly.

To support informed debate, the DEIR and Master Plan should clearly define and consistently use terms such as “safe yield,” “overdraft,” “safe groundwater yield” and “sustainable groundwater yield” and highlight any deviations from prior use.

5. We suggest that the County also assure that the document include a summary and update on Sacramento County General Plan Conservation Element Policy 20 and its implementation; “CO-20” requires that new development be served by new supplemental (i.e. non-groundwater) water supplies. It is our understanding that, as currently interpreted and implemented, the County applies CO-20 only to new development that occurs on historically non-irrigated soils. This is at variance with the plain language of the County General Plan, which stresses that CO-20 “applies to all new commercial and residential development” in “areas previously identified for non-urban uses that are within the Urban Area established by this Plan” as a means for reducing groundwater use and moving toward “safe yield.” The DEIR should include an analysis of the consistency of the Zone 40 Master Plan with the General Plan, include as at least one alternative a scenario of compliance with the General Plan, and either evaluate the environmental effects of the policy as currently being implemented (which include ongoing “overdraft” – as defined in the General Plan – and an incentive to urbanize prime and significant farmland rather than unirrigated land) or identify and summarize where that evaluation has been carried out.

In meetings, some County staff have taken the position that there is no impact or environmental review requirement associated with the development of groundwater sources of water supply for growth that occurs on historically irrigated cropland, because (they argue) the amount of water used by the urban development is equivalent to what was used by the irrigated farmland, on a per-acre basis. This approach is not consistent with CEQA’s requirements, for the following reasons:

- As public (or regulated) groundwater pumping replaces private, unregulated pumping, the County has the opportunity and the obligation to review the impacts of this public pumping, compared to a baseline that retires and does not replace these agricultural pumps. The decision to supplant agricultural

pumping with municipal pumping is a programmatic decision triggering requirements for evaluation of impacts, mitigation measures, and alternatives.

- The municipal pumping is qualitatively (and in all likelihood, quantitatively) different from the agricultural pumping that preceded it. Agricultural pumping varies by season and year-to-year based on crop patterns, crop needs, and weather and rainfall patterns. Agricultural pumping is elastic, with year-to-year rates of withdrawal based on energy costs and other factors. Agricultural pumpers tend to pump from shallower aquifers and cannot, in general, afford the energy costs associated with the deeper municipal wells. In contrast, urban pumping is likely to be permanent, given the demands created and associated infrastructure investment.
- Significant recharge occurs on or associated with farmland, so the net effects on the groundwater table are different from pumping to support urban development.
- Finally, the notion that municipal pumping “replaces” agricultural pumping is factually incorrect. Typically, farmlands in transition to urban development are fallow for an extended period before urban development begins and it takes a period of time to reach buildout conditions (and full demand for water). Thus, the relevant comparison is between the groundwater use associated with fallow or abandoned agricultural fields and urban levels of demand.

6. If the County determines that cumulatively significant direct or indirect environmental impacts are a potential result of ongoing and expanded groundwater pumping, the document should include both a) mitigation measures that address these impacts and b) project design alternatives that avoid these impacts. In particular, since this document will support a policy decision about whether and how to proceed to design and implement a conjunctive use program for the Central Area, fundamentally different alternative approaches to groundwater recharge, storage, and extraction should be presented and evaluated. In particular, we believe that the following strategies merit consideration as components of a conjunctive use program:

- Use of natural waterways for recharge using new supplies;
- Development of “in lieu” recharge agreements with agricultural pumpers, as required by County General Plan Conservation Policy 19; this is a potential water supply/storage strategy and mitigation for the lowering of groundwater levels under agricultural areas;
- A recharge/storage partnership with the Southeast Sacramento County Agricultural Water Authority and/or the Omochumne-Hartnell Water District;
- Protection and expansion of natural recharge areas.

7. As Sacramento County, through the proposed conjunctive use program and Freeport Diversion, seeks to increase its reliance on out-of-County and non-American River sources of water, the County will face an increasing need to demonstrate that its water planning and long-term management policies and

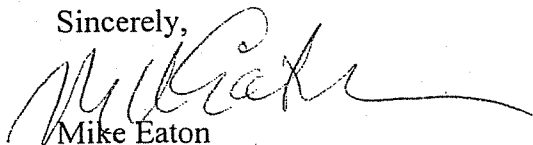
programs are compliant with relevant provisions of federal law, including the Endangered Species Act, the salmon population restoration policies of the CVPIA, and others. The DEIR should present and discuss the County's plans for compliance with federal review and substantive policy requirements and discuss how threatened and endangered species considerations will be integrated into future water and land use planning by the County. These compliance issues are relevant to the question of the feasibility of County plans for long term water importation at significant levels.

In addition, in the "Zone 40 Biological Opinion," dated March 11, 1999, Sacramento County made broad commitments to plan and manage for the protection of a range of threatened and endangered species, as a condition for receipt of contract water from the US Bureau of Reclamation. Since these commitments are applicable to current planning and future operation of County water supply facilities and represent an important planning consideration, the Master Plan DEIR should provide a summary of the Biological Opinion and a status report on its implementation.

8. The NOP does not make clear the significance of the distinction between Zone 40 and the more limited "study area" proposed to be the focus of the DEIR. We assume that the geographic scope of the DEIR will be sufficiently broad to encompass the area impacted by groundwater pumping and all potential alternatives and mitigation measures. At a minimum, the "Groundwater Influence Zone" defined in the Biological Opinion (Figure 1) is the appropriate area for consideration of impacts and alternative solutions.

We look forward to review of the DEIR.

Sincerely,



Mike Eaton

Director, Cosumnes River Project

23

January 9, 2003
E225.000

10545 Armstrong Avenue

Mahter

California

95655

Tele: (916) 876-6000

Fax: (916) 876-6160

Website: www.crsd.com

Dennis Yeast
County of Sacramento
827 Seventh Street, Room 220
Sacramento, CA 95814

Dear Mr. Yeast:

**Subject: Notice of Preparation, 2002 Zone 40 Water Supply
Master Plan
Control No: 02-PWE-0774**

Board of Directors

County of Sacramento

Roger Dickinson

Illa Collin

Muriel P. Johnson

Roger Niello

Don Nottoli

City of Sacramento

Heather Fargo

City of Folsom

Eric King

City of Citrus Heights

James C. Shelby

City of Elk Grove

Sophia Scherman

County Sanitation District 1 (CSD-1) has reviewed the subject documents and has the following comments.

The proposed treatment plants have the potential to discharge significant sanitary waste, which has not been accounted for by the Sacramento Regional County Sanitation District (SRCSD) and CSD-1 master plans. The Environmental Impact Report (EIR) must disclose the volume, characteristics and timing of discharges so as to identify what modifications, if any, are needed to the District Master Plans.

The proposed treatment plants may discharge into existing sanitary sewer systems that may not have sufficient capacity to accept the indicated flows. The EIR must discuss the how these deficiencies will be treated.

The proposed treatment plants will require additional capital expenditures and operational costs by the Districts. The EIR shall identify how these costs will be recovered by the Districts.

If you have any questions regarding these comments, please call me at 876-6094.

Warren H. Harada
Agency Administrator

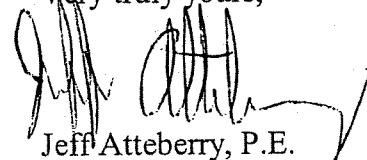
Robert F. Shanks
District Engineer

Marcia Maurer
Chief Financial Officer

Wendell H. Kido
District Manager

Mary K. Snyder
Collection Systems Manager

Very truly yours,



Jeff Atteberry, P.E.
Local Sewer Engineering

JA:ds

cc: Christoph Dobson

yeast010903.ltr

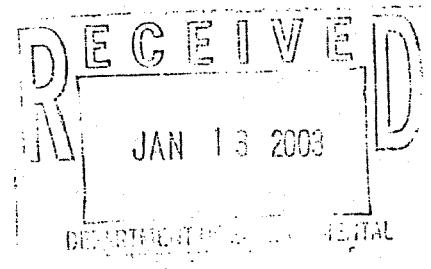
DEPARTMENT OF FISH AND GAME

SACRAMENTO VALLEY AND CENTRAL SIERRA REGION
1701 NIMBUS ROAD, SUITE A
RANCHO CORDOVA, CALIFORNIA 95670
Telephone (916) 358-2900



January 9, 2003

Mr. Dennis Yeast
County of Sacramento
Department of Environmental Review and Assessment
827 7th Street, Room 220
Sacramento, CA 95814



Dear Mr. Yeast:

The Department of Fish and Game (DFG) has reviewed the Notice of Preparation of a draft Environmental Impact Report (DEIR) for the 2002 Zone 40 Water Supply Master Plan. (SCH # 2002122068). The project consists of a plan to construct water wells, surface water diversions, a water treatment plant, and conveyance pipelines. These facilities will be used for the production, conservation, transmission, distribution, and wholesale and retail sale of surface and ground water in the 46,620-acre Zone 40 2002 project area. The project is located in southeastern portion of Sacramento County.

Wildlife habitat resources consist of a variety of habitats including vernal pool grasslands, agricultural lands, annual grasslands, riparian and emergent wetlands, and oak woodlands. Significant natural resources of the project include habitat for special status species. In addition, several waterways cross the project area including the Cosumnes River.

We recommend that the DEIR discuss and provide mitigation for the following:

1. The project's impact upon fish and wildlife and their habitat. We are particularly concerned with the project's potential to impact the Cosumnes River. The proposed project may deplete groundwater supplies in such a manner as to impact the surface flow of the Cosumnes River. A seasonal or annual decrease in surface flow in the Cosumnes River could negatively impact public trust resources along the river such as riparian vegetation and various aquatic (including Chinook salmon) and terrestrial species. The relationship between the proposed project and groundwater resources and the relationship between the local groundwater aquifer and the river should be thoroughly studied in an environmental impact report and any identified impact should be fully mitigated.

2. The project's impact upon significant habitats such as wetlands including vernal pools, marshes, and riparian areas. The project should be designed so that impacts to wetlands are avoided. Mitigation should be provided for unavoidable impacts based upon the concept of no net loss of wetland habitat values or acreage.
3. The proposed project may deplete groundwater supplies in such a manner as to impact the surface flow of the Cosumnes River. A seasonal or annual decrease in surface flow in the Cosumnes River could negatively impact public trust resources along the river such as riparian vegetation and various aquatic and other species. The relationship between the proposed project and groundwater resources and the relationship between the local groundwater aquifer and the river should be thoroughly studied in an environmental impact report and any identified impact should be fully mitigated.
4. The project's impact to special status species including species which are state and federally listed as threatened and endangered.
5. The project's growth inducing and cumulative impacts upon fish, wildlife, water quality and vegetative resources.
6. The DEIR should provide an analysis of specific alternatives which reduce impacts to fish, wildlife, water quality and vegetative resources.
7. The DEIR should contain an evaluation of the proposed project's consistency with the applicable land use plans, such as General Plans, Specific Plans, Watershed Master Plans, Habitat Conservation Plans, Biological Opinions, etc.

The DEIR should consider and analyze whether implementation of the proposed project will result in reasonably foreseeable potentially significant impacts subject to regulation by the DFG under section 1600 et seq. of the Fish and Game Code. In general, such impacts result whenever a proposed project involves work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel, including ephemeral streams and water courses. Impacts triggering

regulation by the DFG under these provisions of the Fish and Game Code typically result from activities that:

- Divert, obstruct, or change the natural flow or the bed, channel or bank of any river, stream, or lake;
- Use material from a streambed; or
- Result in the disposal or deposition of debris, waste, or other material where it may pass into any river stream, or lake.

In the event implementation of the proposed project involves such activities, and those activities will result in reasonably foreseeable substantial adverse effects on fish or wildlife, a Lake or Streambed Alteration Agreement (LSAA) will be required by the DFG. Because issuance of a LSAA is subject to review under the California Environmental Quality Act (CEQA), the DEIR should analyze whether the potentially feasible mitigation measures set forth below will avoid or substantially reduce impacts requiring a LSAA from the DFG.

- A. Protection and maintenance of the riparian, wetland, stream or lake systems to ensure a "no-net-loss" of habitat value and acreage. Vegetation removal should not exceed the minimum necessary to complete operations.
- B. Provisions for the protection of fish and wildlife resources at risk that consider various life stages, maintain migration and dispersal corridors, and protect essential breeding (i.e., spawning, nesting) habitats.
- C. Delineation of buffers along streams and wetlands to provided adequate protection to the aquatic resource. No grading or construction activities should be allowed within these buffers.
- D. Placement of construction materials, spoils or fill, so that they cannot be washed into a stream or lake.
- E. Prevention of downstream sedimentation and pollution. Provisions may include but not be limited to oil/grit separators, detention ponds, buffering filter strips, silt barriers, etc., to prevent downstream sedimentation and pollution.

- F. Restoration plans must include performance standards such as the types of vegetation to be used, the timing of implementation, and contingency plans if the replanting is not successful. Restoration of disturbed areas should utilize native vegetation.

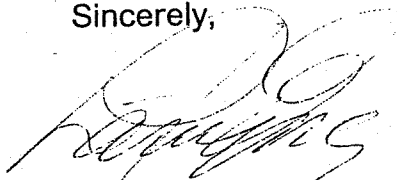
Finally, in the event implementation of the proposed project will involve activities and impacts requiring a LSAA, please contact the Sacramento Valley-Central Sierra Region for a notification packet and fee schedule for a LSAA.

This project will have an impact to fish and/or wildlife habitat. Assessment of fees under Public Resources Code Section 21089 and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project applicant upon filing of the Notice of Determination by the lead agency.

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

Thank you for the opportunity to review this project. If the DFG can be of further assistance, please contact Mr. Dan Gifford, Senior Wildlife Biologist, telephone (209) 369-8851 or, Ms. Terry Roscoe, Habitat Conservation Supervisor, telephone (916) 358-2883.

Sincerely,



Larry L. Eng, Ph.D.
Deputy Regional Manager

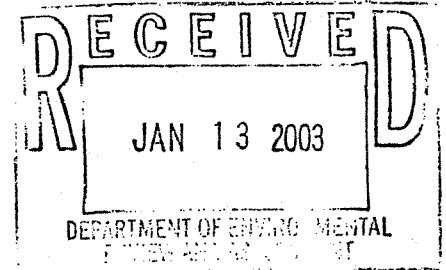
cc: Mr. Peter Cross
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W2605
Sacramento, CA 92825-1888

Ms. Terry Roscoe
Mr. Dan Gifford
Department of Fish and Game
Sacramento Valley - Central Sierra Region
1701 Nimbus Road, Suite A
Rancho Cordova, California 95670

J

SOUTH COUNTY CITIZENS FOR RESPONSIBLE GROWTH

...dedicated to protecting the quality of life in south Sacramento County



January 9, 2003

VIA FACSIMILE & FOLLOW UP REGULAR MAIL

Facsimile: (916) 874-8343

Mr. Dennis E. Yeast *SCCRG*
Environmental Coordinator
County of Sacramento
Dept. of Environmental Review and Assessment
827 Seventh Street, Room 220
Sacramento, CA 95814

Re: Notice of Preparation of a Draft Environmental Impact
Report
2002 Zone 40 Water Supply Master Plan
(Control Number 02-PWE-0774)

Dear Mr. Yeast

South County Citizens for Responsible Growth (SCCRG) would like to be notified at such time when the Draft Environmental Impact Report is released. Please add us to the contact list.

Although the NOP does not specifically state 'groundwater contamination' effects to be included in the DEIR, we strongly urge staff to include these effects in the document, as groundwater contamination and replacement water from this effect must be considered. At this point, SCCRG does not have any other specific comments on the NOP.

SCCRG is a consortium of residents and associations with common interests in orderly growth in South Sacramento County.

P.O.Box 1924
ELK GROVE, CA
95759-1924

The incorporated group's mission is to protect quality of life and locally operated businesses and to conserve agriculture and natural resources in South Sacramento County. For more information, visit our web site at www.sccrg.org.

We look forward to commenting on the Draft Environmental Impact Report when it is available.

Sincerely,

A handwritten signature in cursive script that reads "Mindy Cecchetti".

Mindy Cecchetti, Board Secretary
South County Citizens for Responsible Growth
(916) 354-1806
(916) 354-1289 Fax

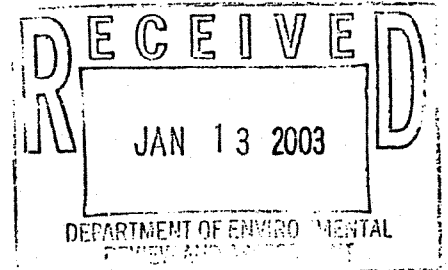
DM

SOUTHERN CALIFORNIA WATER COMPANY
A SUBSIDIARY OF AMERICAN STATES WATER COMPANY

3035 PROSPECT PARK, STE 60 • RANCHO CORDOVA, CA 95670 • (916) 853-3600 • FAX (916) 852-0171

January 9, 2003

County of Sacramento
Environmental Review and
Assessment
827 7th Street, Room 220
Sacramento, CA 95814



Attn: Dennis E. Yeast, Environmental Coordinator

Re: 2002 ZONE 40 WATER SUPPLY MASTER PLAN
Control Number: 02-PWE-0774

Following are comments provided in response to the Notice of Preparation of a Draft Environmental Impact Report ("Notice") by the County of Sacramento dated December 10, 2002. We received the Notice on Friday December 13, 2002, and are responding within 30 days of receipt.

Southern California Water Company ("SCWC"), which does business in the County of Sacramento as Arden-Cordova Water Service, provides water service to approximately 13,000 customers within the City of Rancho Cordova, the community of Gold River, and surrounding unincorporated areas of Sacramento County. SCWC serves its customers with groundwater extracted from within its service area and, to a lesser extent, surface water diverted from the American River. SCWC, like other local water purveyors, is dedicated to protecting the long-term sustainability of local groundwater supplies, through collaborative efforts like the Sacramento Area Water Forum. Accordingly, SCWC is intensely interested in any new water development projects with regional significance, such as the future facilities planned as part of the Zone 40 Water Supply Master Plan.

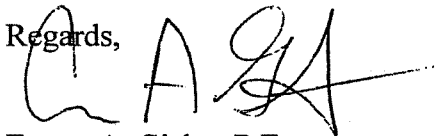
Dennis E. Yeast
January 9, 2003
Page 2

While we have not had the opportunity to review the Water Supply Master Plan referenced in the Notice, we recommend that you consider the following potential environmental impacts in your Draft Environmental Impact Report ("DEIR"):

- Groundwater Contamination Issues
- Migration of the Contaminant Plume(s) – both horizontal and vertical
- Impact on groundwater cleanup efforts
- Impact of the Groundwater Extraction and Treatment (GET) operations on the basin yield established by the Water Forum
- Impact on Short and Long Term water supplies
- Impact on the newly incorporated City of Rancho Cordova
- Water Service by other water purveyors

We appreciate the opportunity to provide comments on the scope of environmental review for the Zone 40 Water Supply Master Plan and look forward to continuing to work with the County of Sacramento on regional water supply issues.

Regards,



Ernest A. Gisler, P.E.
Engineering & Planning Manager

C: Denise L. Kruger, Vice President, Southern California Water Company



Technology in balance with nature

10345 Armstrong Avenue

January 10, 2003

Mather
California

95655
Tele: (916) 876-6000
Fax: (916) 876-6160
Website: www.srcsd.com

Mr. Dennis Yeast
Environmental Coordinator
County of Sacramento, Environmental Review and Assessment
827 7th Street, Room 220
Sacramento, California 95814

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City of Elk Grove
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Dear Mr. Yeast,

SUBJECT: SRCS D Comments on Notice of Preparation of a Draft Environmental Impact Report for "2002 Zone 40 Water Supply Master Plan" (Control Number 02-PWE-0774)

In response to the Notice of Preparation, dated December 10, 2002, SRCS D has developed comments on the "2002 Zone 40 Water Supply Master Plan." SRCS D comments are attached to this cover letter.

If you have any questions, please contact me at (916) 876-6115, or Ruben Robles at (916) 876-6119.

Sincerely,

Wendell H. Kido
Wendell H. Kido
District Manager

Warren H. Harada
Agency Administrator

Robert F. Shanks
District Engineer

Marcia Maurer
Chief Financial Officer

Wendell H. Kido
District Manager

Mary K. Snyder
Collection Systems Manager

Stan R. Dean
Plant Manager

WHK/RRR:gjl (NOP DIER Zone 40 Comments 1-10-03.doc)

cc: Robert F. Shanks
Ruben Robles
Kent Craney

Hard copy to follow.

Post-it® Fax Note	7671	Date	1/10/03	# of pages	3
To	Dennis Yeast	From	Wendell Kido		
Co./Dept.	DERA	Co.	SRCS D		
Phone #		Phone #	876-6116		
Fax #	874-8343	Fax #			

SRCS D COMMENTS
Notice of Preparation of a Draft Environmental Impact Report for
"2002 Zone 40 Water Supply Master Plan"

Comment 1 - Recycled Water

Background

The Sacramento Regional County Sanitation District (SRCS D) has constructed a 5 MGD water recycling plant (WRP) that is scheduled to go on line in mid-2003. The recycled water will be sold at a wholesale rate to the Sacramento County Water Agency (SCWA), for sale and distribution to customers in the vicinity of SRWTP. This Phase I project will provide recycled water to the Lakeside, Laguna Stonelake, and Laguna West developments. Phase II includes the expansion of the WRP to 10 MGD, and will include the SCWA sale of recycled water to the East Franklin, Laguna Ridge, and Lent Ranch developments.

As identified in the "DRAFT - Zone 40 Water Supply Master Plan (WSMP), December 2002" (Master Plan), the combined Phase I and Phase II projects will provide up to 4,400 AFA (4 MGD) maximum annual demand of recycled water for landscape irrigation purposes, which will include parks, schools, landscape medians, etc.

SRCS D Large Scale Water Recycling

The SRCS D is interested in large-scale water recycling beyond the Phase I & II projects described above, because of the region-wide benefits in conserving groundwater and surface water supplies, and water recycling will reduce effluent discharge to the Sacramento River. One opportunity being investigated is to install a recycled water pipeline in parallel to the raw water supply pipeline for the Freeport Regional Water Project (FRWP).

The SRCS D has commissioned a feasibility study to investigate the viability of this project. The study is considering co-construction issues with respect to the FRWP, market assessment in the central and southeast Sacramento County areas, treatment technology issues, and overall project costs. The project could deliver recycled water for surface irrigation along the FRWP alignment, which generally runs east from the SRWTP, to the Folsom South Canal. Recycled water could also be supplied to the relatively undeveloped east/southeast part of the county. In addition to surface irrigation, the viability of ground water recharge in the east county, with appropriately treated recycled water is being studied. A significant portion of this project study area is within SCWA's Zone 40 service area, but also overlaps into other water agency areas.

In addition to the project described above, there may be other opportunities for use of recycled water, this includes:

- Residential landscape irrigation. This type of water recycling would be modeled after El Dorado Irrigation District's recycled water service to the Serrano Development in El Dorado Hills, which utilizes dual piping/plumbing facilities at each home site. One set of pipes are dedicated for potable water uses internal to the home and external uses such as hose bibs and swimming pools. While the second set of pipes are dedicated for landscape irrigation of front and back yards using recycled water. This type of water recycling would be most applicable to areas with new home construction, since installation will be easier, but it could also be considered for retrofit in other areas. This type of project could be considered in developing areas such as the East Franklin, Laguna Ridge, and Lent Ranch developments, or future developments in the east county.

- Retrofitting neighborhoods in proximity to SRWTP with water recycling piping for landscape irrigation purposes. This type of water recycling would largely mirror the efforts currently underway in Laguna West. Predominantly parks, schools and landscape medians are suggested for examination as suitable sites for water recycling.
- Utilizing construction corridors for large utility pipes (sewer interceptors, raw water delivery pipes (FRWP), etc.) to co-construct water recycling transmission lines to developing areas of Sacramento County, served by SCWA's Zone 40, along with other utilities that are being installed to serve these areas. Areas that could merit consideration would include Vineyards, North Vineyards, Sunrise Douglas and Mather. These areas could be conditioned for dual plumbing systems that would accommodate landscape irrigation of parks, schools and landscape medians by recycled water.

Recycled Water Partnerships

Recycled water could supply a reliable water supply option to help offset some of the reliability concerns with other water options. Recycled water is especially beneficial in drought years when surface water supplies would be minimized or eliminated. Recycled water is a highly reliable, drought proof water source.

As previously discussed, the SRCSD is actively investigating large scale water recycling options for the Sacramento region. For large scale water recycling to be viable, the SRCSD would likely need to develop partnerships with one or more water agencies or other entities. The SRCSD is open to pursuing these partnerships in order to fully investigate recycled water reuse alternatives in the region. It is most economical to install recycled water infrastructure as development occurs, as the Sacramento region continues to develop this will become more difficult.

It is recommended that these recycled water options be more fully investigated as alternative water supplies.

Comment 2 – Freeport WTP & RWP

Section 5 – Water Supply Sources and Facilities

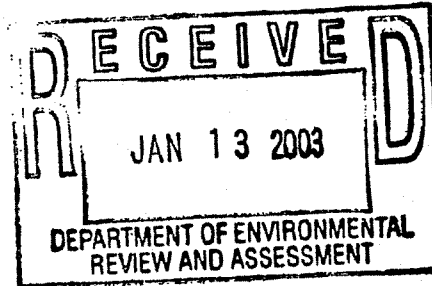
Any SF1. - SCWA Freeport Water Treatment Project, and SF2. Sacramento Regional Diversion Project, EIR documentation must discuss compatibility with the uses established for the SRCSD "Bufferlands". Use compatibility analysis should be conducted. The EIR must also address the location and compatibility of "treated water conveyance facilities" with the SRCSD interceptor sewers (existing/planned). Significant conflicts could arise between the Freeport projects and the interceptors and other utilities at the Sacramento Regional Wastewater Treatment Plant.



Institute for Ecological Health

409 Jardin Place, Davis, California 95616 • Ph/fax 530-756-6455 • ieh@cal.net

January 11th, 2003



Dennis Yeast,
Environmental Coordinator
County of Sacramento, DERA
827 7th St., Room 220
Sacramento CA 95814

Dear Dennis Yeast:

Thank you very much for sending us the NOP for preparation of a draft Environmental Impact Report on the 2002 Zone 40 Water Supply Master Plan. I will be the contact person for the Institute for Ecological Health regarding this project.

We ask that the issues you address in this EIR include:

- ◆ The scientific validity of the long-term average groundwater pumping yield established by the Water Forum, including thorough consideration of the possibility that this yield is unsustainable and the determination of a yield that is scientifically valid.
- ◆ Long-term needs and provision for groundwater-recharge, including delineation of groundwater recharge areas, mechanisms to assure the conservation of these areas, and needs to raise the aquifer water table over time.
- ◆ Impacts of a long run of dry years, and of likely climate change, on groundwater and on surface water supplies.
- ◆ Impacts of groundwater pumping on the various creeks in the region, as well as the Cosumnes River, including impacts on riparian areas, and actions required to restore and enhance the biological values and ecological functions of the creeks and riparian areas.
- ◆ Impacts of proposed groundwater pumping on existing residential and agricultural wells and on agricultural operations.
- ◆ Impacts of Zone 40 water supply operations on the ecological conditions of South Sacramento County, including growth inducing impacts, impacts on endangered, threatened and sensitive species, ecological restoration and enhancement needs, compliance with a variety of federal and state laws, and the need for completion and effective implementation of the South Sacramento County HCP.

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Dave Forrest

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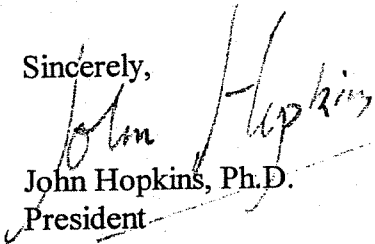
Randall Fleming

Michele Perrault

- ◆ How to assure effective implementation of the County's General Plan policy CO-20.

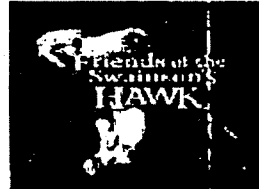
Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink that reads "John Hopkins". The signature is written in a cursive style with a large, prominent "H".

John Hopkins, Ph.D.
President

29



**SIERRA CLUB - MOTHER LODGE CHAPTER
FRIENDS OF THE SWAINSON'S HAWK
ENVIRONMENTAL COUNCIL OF SACRAMENTO**

January 13, 2003

Mr. Dennis Yeast
Department of Environmental Review
County of Sacramento
827 - 7th Street, Room 220
Sacramento, CA 95814

RE: Notice of Preparation of Draft EIR, Zone 40 Water Supply Master Plan,
#02-PWE-0774

Dear Mr. Yeast,

The Sierra Club - Mother Lode Chapter, the Friends of the Swainson's Hawk, and Environmental Council of Sacramento received the Notice of Preparation from third parties shortly before Christmas, 2002. We received the Draft Master Plan only a few days ago, and have not had time for more than a cursory review. We offer the following comments on the Notice of Preparation:

1. It is acknowledged that groundwater levels between the American and Cosumnes Rivers are declining due to groundwater pumping, and that further decline would result in serious harm to the environment, agriculture, and existing groundwater users. See "Central Sacramento County Groundwater Forum" p. 2, **EXHIBIT A**, attached, an undated document published by the Water Forum, available on the Water Forum internet site. The Draft Master Plan appears to authorize an indefinite amount of additional groundwater pumping by SCWA, to serve new development, prior to construction and operation of facilities that would provide surface water to implement conjunctive use. The Master Plan assumes that enough surface water for conjunctive use will become available and operational by 2008 or 2010 that would allow the water table to stabilize and also provide sufficient water for build-out to the Sacramento County Urban Service

Boundary by 2030. The Draft Master Plan has no "Plan B" for preventing further decline of the groundwater level and damage to resources dependent upon groundwater if the anticipated surface water diversions are delayed or do not materialize. As discussed below, the certainty of surface water diversions for conjunctive use is highly speculative, and may not be sufficiently assured to meet the standards of applicable law, including but not limited to CEQA, ESA, and the Kuehl bill. The EIR should discuss the reasonably foreseeable potential consequences of failure to implement all or some of the anticipated surface water diversions timely, or at all, and should explain how damage to the aquifer, environment, and agriculture will be prevented or mitigated in the event that surface water is unavailable.

2. We support and incorporate by reference the letter of comment on this NOP submitted by The Nature Conservancy, January 7, 2003. In addition, the letters of comment on the Sunrise Douglas Community Plan Final EIR submitted by Stephen C. Volker, Attorney, on behalf of Environmental Council of Sacramento and Vineyard Area Citizens for Responsible Growth, dated July 16, 2002, and the letter of Robert Curry, Ph.D, July 16, 2002, (attached to Mr. Volker's letter) are also applicable to the proposed Zone 40 project, as to water-related issues, because Sunrise Douglas and the proposed Zone 40 Plan will extract groundwater from the same aquifer. Copies of those letters are attached as **EXHIBITS B and C**. Please consider those comments applicable to this NOP as well.

3. A significant population of Swainson's Hawk, listed as threatened under the California Endangered Species Act, nests near the Cosumnes River and forages for small rodents on farmlands and open fields in south Sacramento County. The EIR must describe and evaluate the impacts of the project, on Swainson's Hawk, including but not limited to the following:

a. Impacts of new urban growth induced by water supply provided by the proposed Master Plan, including loss of farmland and open space used as foraging habitat by Swainson's Hawk.

b. Impacts of decline of the groundwater level due to groundwater extraction contemplated by the project, upon trees and riparian habitat used for nesting, and farmland and open space used for foraging by Swainson's Hawk. Please address impacts of (1) decline of groundwater level as projected by the Draft Master Plan, (2) potential decline of groundwater level occurring prior to implementation of operational surface water facilities proposed in the Master Plan, (3) potential decline of groundwater level that would occur if Master Plan proceeds as stated, but the diversion of surface water for conjunctive use cannot be implemented, or cannot be implemented to the extent called for in the Master Plan.

4. Construction of facilities for diversion of surface water for conjunctive use is dependent upon financing to pay for facilities. The Financial Analysis of the Draft Master Plan is unacceptably vague, and provides no assurance that the surface diversion facilities will be built on schedule, or at all. This uncertainty jeopardizes the aquifer, and surface watershed and other resources dependent upon the aquifer, because the Master Plan does not prevent an indefinite

amount of new growth, including total build-out to the USB, which is totally dependent upon further extraction of groundwater, before surface water diversion becoming operational. The Financial Analysis relies upon developer fees and debt financing, with no further explanation. Debt financing by revenue bonds paid by the rate payers can be accomplished by action of the SCWA, but debt financing by Mello-Roos or other special assessment districts requires vote of the affected landowners, who may not be motivated to assess themselves if they are allowed to develop prior to implementation of surface diversion facilities. The Financing Component and EIR must explain how the financing will work in enough detail to provide assurance that the funding for the surface diversion facilities will be available and sufficient to build the facilities on schedule.

5. The EIR and Master Plan should disclose and analyze the impacts of all other existing or reasonably foreseeable groundwater pumping which may affect the aquifer between the American and Cosumnes River and which is not included in the Zone 40 Master Plan, including Elk Grove and Sunrise Douglas.

6. Wells at the northern end of the aquifer (Rancho Cordova – Mather area) have been closed due to Aerojet contamination, and more may close as contamination spreads. Replacement water legally required under Federal EPA order has not been forthcoming. Southern California Water Company (parent for Arden-Cordova) has sued Aerojet. It is speculative to assume that the contaminated area of the aquifer can be sufficiently cleaned up to be potable. An obvious option for replacement water is uncontaminated groundwater from the Zone 40 area, which would further deplete the aquifer in that area. The EIR cannot analyze Zone 40 in isolation from the solution, or potential solutions, for replacement water for the Rancho Cordova – Mather area. The EIR would be incomplete if it did not discuss and analyze impacts of potential pumping of replacement groundwater from the uncontaminated area of the aquifer.

7. The EIR should address, as to area between American and Cosumnes River, and as to Cosumnes, Deer Creek, Morrison, and Laguna Creek watersheds, the following scenarios: impacts to aquifer, watershed, vegetation and wildlife, and other surface resources, of (1) decline of groundwater level as projected by the Draft Master Plan, (2) potential decline of groundwater level due to new development and other causes that could foreseeably occur prior to implementation of operational surface water facilities proposed in the Master Plan, (3) potential decline of groundwater level that would occur due to reasonably foreseeable new development if Master Plan proceeds as stated, but the diversion of surface water for conjunctive use cannot be implemented, or cannot be implemented to the extent called for in the Master Plan. The EIR should identify mitigation measures to mitigate the impacts of each of these scenarios.

8. The Draft Master Plan, Water Supply Sources, pp. 5-2, 5-3, lists six components of the surface water constituting the surface water component of the conjunctive use that is the cornerstone of the Master Plan, and assumes that all of these sources will be successfully implemented. All of these sources appear to be uncertain, as discussed below. The EIR should discuss in detail each source of anticipated surface water, the source of Zone 40's entitlement,

factors affecting reliability and certainty of each source, factors which may adversely affect entitlement and availability of some or all of each component, reasons why SCWA feels that each source and amount is sufficiently assured, and the environmental impacts of the failure of one or more of these sources to provide the amount of water anticipated by the Master Plan. More detail about these concerns follows

a. The Draft Master Plan, pp. 5-2, 5-3, and Table 5-2, shows that surface water components S1 (intermittent appropriative water hopefully available during periods of high river flows, application filed but not approved) and S5 (hoped-for future purchases from unknown water purveyors who have not agreed to sell) are dependent upon future agreement by other agencies and availability of water controlled by other agencies. Water obtained from these sources appears to be very short term. These two elements together comprise 26,000 afy of the 76,300 afy "estimated long term average use" of surface water assumed to be available. *Id.* p. 5-2. The Draft Master Plan assesses "Reliability" of these sources as "Low" and "Variable".

b. Availability of source S4 (Ezzio water), 13,000 afy estimated long term average use per year, *id.* p. 5-2, is jeopardized by the County's continuing failure to comply with the mitigation conditions of U.S. Fish and Wildlife Service Biological Opinion March 1, 1999, which are conditions of the County's water contract with the Bureau of Reclamation. See the letter of USFWS to the Bureau of Reclamation, December 17, 2002, copied to the County, attached **EXHIBIT D**. As is obvious from reading the Service's letter, the most serious violation is the County's failure to complete and implement a regional conservation strategy (HCP or NCCP) to address the effects of urban growth in Zone 40 anticipated from the increased water supply provided by the Master Plan. The County's continued failure to comply could lead to a finding that the impacts of the water deliveries would jeopardize the continued existence of threatened and endangered species, notably vernal pool species that would be impacted by development facilitated by the water deliveries. Unfortunately, the County's "track record" on this and other environmental responsibilities, and the apparent philosophy of the current Sacramento County Board of Supervisors, point to the likelihood that the County will remain in non-compliance. The practical effect could be revocation of the County's contract with the Bureau by Federal agency action or by citizens suit under the Federal or California Endangered Species Acts. If the Bureau water contract is lost or suspended due to County's failure to implement required mitigation conditions, there is no assurance that the water could later be regained.

c. Diversion of surface water from the Sacramento River was challenged in litigation filed by south-of-Delta water interests. The lawsuit was dismissed by Sacramento County Superior Court, but we understand that Notice of Appeal was filed. The outcome of any litigation pertaining to the right to divert surface water of the Sacramento River must be considered unpredictable until all appeals are exhausted. The

Master Plan and EIR cannot assume that the Court of Appeal or Supreme Court will uphold the proposed Zone 40 diversions and facilities that are subject of the litigation.

d. The Draft Master Plan characterizes components S2, S3, (SMUD assignments) and S4 (Fazio water) as only "moderate" reliability, *id.* p. 5-2, which is not reassuring. Only the prospective purchase of 9,300 afy from the City is regarded as "high" reliability. *Id.* p. 5-2, but the City has not yet executed an agreement for the water, and it is not apparent why the City would be obligated to do so. The EIR should describe the source of SMUD's entitlement, the "Fazio water", and the City water, and, as to each "component", the EIR should disclose those circumstances which would prevent Zone 40's entitlement to and use of amounts stated by the Draft Master Plan.

e. The EIR should analyze the impacts of California's loss of a significant portion of its Colorado River water upon implementation of Zone 40 surface water diversion; including the potential impacts of potential actions by southern-of-Delta water interests to obtain replacement water, which may affect Zone 40's ability to obtain surface water. It should be noted that the lost Colorado River water was serving existing water users, and that existing water users may have right to replacement water superior to Zone 40, and SMUD, which are not presently using water.

9. Please describe the possible circumstances associated with Aerojet's remediation of the perchlorate-contaminated groundwater plume. What is the likelihood that Aerojet will continue to pump cleaned-up water from the aquifer into the American River, and will the remediated water maintain its groundwater status? If groundwater is thus lost from the Central Groundwater Basin, how will the County or Water Forum revisit the sustainable yield figure of 273,000 AFY?

10. The Draft Master Plan's reliance upon the Water Forum Agreement, particularly the WFA finding that average "sustainable yield" of groundwater from the Central Water Basin (between American and Cosumnes Rivers) is 273,000 afy (acre fee per year), is misplaced, and an abuse of the Water Forum Agreement, for the following reasons:

a. The WFA definition of "sustainable yield" is the amount of water which may be pumped from the aquifer annually, averaged over a long period of time, without damaging the aquifer. This definition does not consider whether this amount of pumping may cause damage to agriculture, existing users, and surface watershed resources dependent upon groundwater, including the Cosumnes and other surface waters dependent in part upon groundwater, particularly during dry periods, and damage to vegetation dependent in part upon groundwater. An amount of pumping or sustainable yield measured as the AFY which will not cause damage to the aquifer and to surface resources may be substantially less than the "sustainable yield" of the WFA.

b. The EIR for the WFA did not consider impacts of WFA "sustainable yield" pumping upon any watershed, or upon agriculture or other resources dependent upon groundwater, other than the American River, or upon species using the Cosumnes and other surface water resources which might be adversely impacted by groundwater extraction anticipated by the WFA and Zone 40 Master Plan. The proposed pumping impacts mostly the watersheds of the Cosumnes River, Deer, Morrison, and Laguna creeks. The EIR for WFA assumes availability of surface water, to allow the water table to stabilize, and does not consider the potential consequences of the scenario of increased pumping combined but potential inability to implement surface water diversions that are assumed by WFA.

c. The WFA "sustainable yield" number assumes availability of and entitlement to surface water for conjunctive use. As discussed elsewhere in these comments, availability of surface water, assumed by the Draft Zone 40 Master Plan and WFA, is highly speculative and certainly cannot be relied upon until water rights are firmly acquired, challenges to water rights and litigation are resolved, and facilities are completed and operational. Despite the uncertainty as to surface water, the WFA allows increased groundwater pumping prior to establishment of water entitlements and operational diversion facilities.

d. The WFA "sustainable yield" number did not consider the impacts of Aerojet's contamination of the northern portion of the aquifer (Rancho Cordoba area), which has not been remediated. The full extent of the contamination was not known or disclosed until after the WFA was signed.

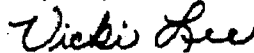
e. Much of the above information pertaining to the assumptions underlying the WFA "sustainable yield" number, and other information discussed in this letter, was not disclosed to the environmental signatories of the WFA, or was not known, until after the WFA was signed. In 2001, a representative of the Sierra Club, a WFA signatory, represented by undersigned Vicki Lee, and a representative of The Nature Conservancy approached the Water Forum and raised issues, in connection with the Sunrise Douglas project, of potential impacts of groundwater pumping on the Cosumnes River, and loss of WFA sustainable yield caused by Aerojet's contamination and remedial pumping by Aerojet to removed contaminated groundwater. These were discussed under the auspices of the Water Forum, and as a result the County agreed to review these impacts in the EIR for the Zone 40 Master Water Supply Plan. See "Water Forum 2001 Annual Report", p. 27, attached EXHIBIT E. It is very clear from the NOP and the Draft Master Plan that the EIR continues to assume the validity of the WFA "sustainable yield" estimate of 273,000 afy, and that the EIR will not undertake the updated analysis promised by the County at the Water Forum discussions. Id. EXHIBIT E. The undersigned commentators, including the Sierra Club, a signatory on the WFA, regard this as an act of bad faith by the County which seriously undermines the credibility of the Water Forum.

f. The WFA and the Zone 40 Draft Master Plan assume an urban water conservation factor of 25.6% due to conservation measures in the Water Forum Water Conservation Plan (see Appendix C and D of Draft Zone 40 Master Plan). However, most elements of the Water Forum Conservation Plan call for voluntary and unenforceable conservation measures by water users who are under no obligation to implement these measures. The WFA and Draft Zone 40 Master Plan allow increased groundwater pumping before it is known whether the Water Forum Water Conservation Measures are actually achieving 25% reduction.

Based on the information supplied by the Draft Master Plan, NOP, and Water Forum Agreement and EIR, it appears that the Zone 40 Master Plan is on a collision course with CEQA, NEPA, Federal and State Endangered Species Acts, the Kuehl bill, and possibly other statutes and regulations. It is in the best interest of the County to take breather, get off of the fast-track, and take a good hard look at where this is going and how to achieve realistic solutions.

Thank you for the opportunity to comment.

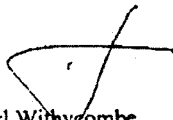
Very Truly Yours,



Vicki Lee, Conservation Chair
Sierra Club - Mother Lode Chapter



James P. Pacht, Legal Counsel
Friends of the Swainson's Hawk

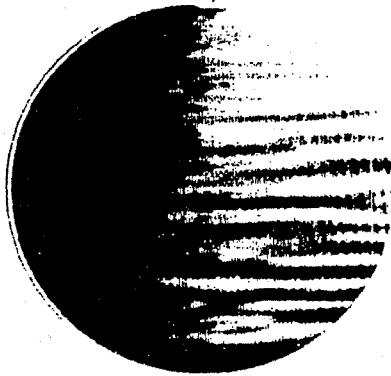


Earl Withycombe
Water Chair
Environmental Council of Sacramento

Central Sacramento County



A Partnership of the Water Forum,
California Department of Water Resources and
the California Center for Public Dispute Resolution



What's the Situation?

- ▶ About two-thirds of the water used in the Central Sacramento County area comes from underground. This groundwater is vital to all segments of the community - agriculture, business, the environment and residents.
- ▶ While actual use varies according to conditions, in 1990 about 250,000 acre-feet of groundwater was pumped in Central Sacramento County for ranching, farming, environmental, business and residential uses.
- ▶ Significant increases in urban demand are anticipated, which could increase reliance on the groundwater aquifer.

What's Broken?

- ▶ For years, the risk facing Central Sacramento County's groundwater resource has been growing. The presence and migration of contamination within the aquifer and continued reliance on groundwater threaten to affect groundwater storage capacity and quality.
- ▶ In some areas, groundwater pumping levels have declined.
- ▶ Several contamination sites affect Central County groundwater, including three USEPA Superfund sites, Aerojet, the former Mather AFB, and Sacramento Army Depot. Other sites are Kiefer Landfill, the abandoned PG&E site adjacent to the Sacramento River, Southern Pacific and Union Pacific RR yards in downtown Sacramento, and the former McDonald-Douglas Rancho Cordova rocket test site (also known as the Inactive Rancho Cordova Test Site).



EXHIBIT A

Central Sacramento County Groundwater Forum

What Are the Risks of No Action?

- ▶ Unless there is a plan for preventing over-pumping and further contamination, groundwater availability and quality in Central Sacramento County is at risk.
- ▶ Many community members are concerned about increased costs - to pump water, drill wells, clean up contamination, and pay for replacement surface water.
- ▶ As groundwater levels decline, well owners may be forced to incur the expense of deepening or drilling new wells.
- ▶ Water purveyors may be forced to spend more money on increased water treatment, installation of new, and/or deeper wells, and the purchase of surface water. These expenses will be passed on to consumers.
- ▶ A result of falling groundwater levels is a decline in river and stream flows, including Laguna Creek, Deer Creek, and the Cosumnes River. These flow reductions have negatively affected the populations of salmon and other native fish species.
- ▶ Contamination in the groundwater aquifer is spreading more quickly than once anticipated. Pumping can increase and accelerate the movement of contamination plumes.
- ▶ The state may intervene with legislation.
- ▶ Potential lawsuits could force adjudication, a process that will be less responsive to local interests and concerns than would a locally developed management plan.

What's the Path to a Solution?

- ▶ Everyone who relies upon groundwater, including ranchers and farmers, residents, business and environmental interests, must take action now to prevent a groundwater crisis in the future.
- ▶ Management of groundwater by those who use the resource most and know it best is the most promising solution. Determining the best management structure should come through collaboration among all the stakeholder interests.
- ▶ While there are a number of possible solutions to the Central Sacramento County's groundwater problem, the first step is to convene the local stakeholder groups and engage them in the problem-solving process.

What's the Process?

- ▶ The Water Forum is sponsoring the Central Sacramento County Groundwater Forum to provide an avenue for local stakeholders to collaboratively develop recommendations to protect the health and viability of the Central Sacramento County groundwater basin.
- ▶ Participants in the Central County Groundwater Forum include representatives of stakeholder interests in the Central County area, including ranchers and farmers, business, community and environmental interests, local government and public agencies, water purveyors and agricultural/residential users.
- ▶ Through education and negotiation, the Central Groundwater Forum will protect the long-term interests of Central Sacramento County stakeholders by developing recommendations that will protect and use groundwater resources in a sustainable manner.
- ▶ Stakeholder group representatives are responsible for communicating with members of their interest group and representing these interests in the Central County Groundwater Forum process.
- ▶ The Groundwater Forum is not a decision-making body. Proposed recommendations will be presented to the Water Forum stakeholders for review and approval, and forwarded to the relevant public agencies for implementation as appropriate.

EXHIBIT A-2

STEPHAN C. VOLKER
EILEEN M. RICE
HEATHER A. DAGEN

Law Offices of
STEPHAN C. VOLKER
436 14th Street, Suite 1300
Oakland, California 94612
TEL: 510/496-0600 ♦ FAX: 510/496-1366

File No. 10.288

July 17, 2002

Dennis E. Yeast
County of Sacramento
Department of Environmental Review and Assessment
827 Seventh Street, Room 220
Sacramento, CA 95814

Re: Comments on Final Environmental Impact Report for the Sunrise Douglas
Community Plan/SunRidge Specific Plan

Dear Mr. Yeast:

On behalf of the Vineyard Area Citizens for Responsible Growth ("VACRG" or "Vineyard Citizens") and the Environmental Council of Sacramento ("ECOS"), I submit comments on the Final Environmental Impact Report for the Sunrise Douglas Community Plan/SunRidge Specific Plan ("Sunrise Project" or "project"). These comments should be read in conjunction with the initial comments to the Draft Environmental Impact Report ("DEIR"), which were submitted by Vineyard Citizens in July 2001.

I. Groundwater Concerns

Vineyard Citizens and ECOS oppose this project because the County has not adequately addressed its adverse impacts on the groundwater resources in the area. Although several commenters pointed out the deficiencies of the DEIR in this regard, the FEIR still fails to provide an adequate assessment of the project's cumulative impacts on regional water supply and quality (groundwater and surface water) and related negative impacts to endangered or threatened species and their habitat.

Vineyard Citizens and ECOS have received an independent groundwater analysis from Dr. Robert Curry, a professional hydrologist. As more clearly explained in Dr. Curry's attached report, the proposed project will dry up the Consumes River. Further, the EIR used inaccurate models to assess groundwater level impacts. According to Dr. Curry, "the proposed operation of the well field will increase the duration of dry-year no-flow periods in the Consumes by ... 1 month, and will change mid-summer low-flow conditions to intermittent flow conditions during average and drier years when daily flow at Michigan Bar is on the order of 10-15 cubic feet per second. Because these conditions occur every two to three years, stream habitats, including riparian zones and bank protection will be significantly degraded upstream of Highway 99 through the entire project area." Curry Report at pp. 1-2.

EXHIBIT B

July 17, 2002
Page 2

A. The IGSMSC Model Misrepresented Impacts on the Cosumnes River

Commissioned by the project developer, the Montgomery Watson report on potential effects of groundwater depletion does not adequately address the significant impacts the proposed development of groundwater will have on the Cosumnes River and its resident species. As Dr. Curry explains, lowering the groundwater table as proposed will dewater surface streams and rivers. The IGSMSC Model does not even consider, much less evaluate, the resulting adverse impacts on flow duration in surface streams. Curry Report at pp. 2-4.

B. The FEIR Does Not Adequately Address Impacts to Aquatic and Riparian Species and Their Habitats

The FEIR concedes an hydraulic connection between the unconfined groundwater system and the Cosumnes River and Deer Creek in the eastern and western portions of Sacramento County. It further concedes that the river and creek will be impacted by groundwater depletions by operation of the proposed well field. Yet, stating only that the resulting impacts on Deer Creek and the Cosumnes River are "expected to be small," the FEIR in no way quantifies the expected decrease in streamflow. FEIR, Volume II, Response 36-2, p. 23-125. Further, it does not analyze the decrease in streamflow in terms of *biological relevance*, suggesting that streamflow levels, as they relate to resident species, were never considered.

In its responses to comments on the DEIR, the FEIR also admits that the impacts of groundwater depletion on the Cosumnes River and its tributaries are "currently uncertain," with the "potential exception ... during periods of very low flow... [during which] depletions [of the unconfined aquifer system] could change the timing and areal extent of the dewatering stream invert, potentially impacting aquatic and riparian-dependent species and habitat." FEIR, Volume II, Response 36-2, p. 23.126. Despite this admission of potential impacts to protected species and habitat, the FEIR in no way analyzes the significance of its statement. It does not report on the frequency or duration of low flow periods, nor does it address the river's documented progressively longer dry periods. It does not quantify the "timing and areal extent" of predicted changes to the dewatering stream invert. The failure to provide a *quantitative* analysis of these impacts violates CEQA. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 730-737.

In fact, according to Dr. Curry, "[t]he proposed increase in area of the cone of depression and the duration of depression of the water table will *increase the area of the river that is dewatered* by the groundwater extraction and increase the duration of any dewatering that would otherwise occur. That certainly is a very significant adverse effect." Curry Report at p. 2.

Additionally, the FEIR responses to comments do not evaluate the current depths of the waterways. Nor does the document address the Cosumnes River's historical losses of surface water to groundwater. It ignores the current community-wide restoration and conservation activities in place to protect resident aquatic species. Notwithstanding the large number of

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July 17, 2002
Page 3

public comments requesting the protection of aquatic and riparian species, the FEIR responses do not even discuss which species will be impacted, or in which ways those "expected to be small" impacts will be manifested.

II. Impacts of Proposed North Valley Well Field are not Properly Addressed

The FEIR also neglects to analyze together the development project and the North Valley Well Field project ("NVWF"), despite the fact that the proposed Sunrise Project is inherently dependent on the approval of the NVWF. In fact, the County has gone so far as to issue the FEIS for the Sunrise Project ostensibly without ever knowing whether the NVWF will be approved. Based on this cart-before-the-horse approach, one might surmise that indeed the County does know that the NVWF will be approved, which flies in the face of CEQA's public participation goals.

A. Foreseeable Impacts Are Not Adequately Addressed

CEQA does not allow piecemealing, and foreseeable impacts must be addressed at the earliest stage possible. See, *Citizens Ass'n for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App. 151, 165-66. The County attempts to couch the preparation of separate documents for the project and for the well field as necessary to keep separate the costs for creating replacement water and creating new water for planned growth. This explanation is a distinction without a difference. The County admits that the same "stress" will be placed on the groundwater basin regardless of what form the NVWF takes; its position assumes that the NVWF project will go forward, even though no public review has taken place. Moreover, the FEIR does not state where SDGP/SRSP would get water if the NVWF is not approved. Because the projects are so tightly interrelated, the County must not make piecemeal decisions, but must instead evaluate the foreseeable impacts of the Sunrise Project and the specific impacts of the well field project together.

B. Inaccurate Project Description

The project description component of an EIR is crucial. Indeed, "an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193; see also *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182 (invalidating EIR for a specific plan permitting 5,000 residential units because the document had not adequately dealt with the environmental consequences associated with acquiring a long-term water supply for the proposed development). The Sunrise Douglas plan further violates CEQA, by not adequately dealing with the environmental consequences specifically resulting from the planned NVWF project.

In *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 729-34, the Court of Appeal found inadequate the project description in an EIR for a residential development proposal. According to the court, the EIR should have treated,

EXHIBIT B-3

January 16, 2003

Mr. Dennis Yeast
Dept of Environmental Review and Assessment
County of Sacramento
827 7th Street, Room 220
Sacramento, CA 95814

Re: Groundwater Extraction

Dear Dennis:

Based on our review of the Draft Zone 40 Water Supply Master Plan, which we received last week, it is clear that the project as proposed is inconsistent with the goals, policies and assumptions of Sacramento County's General Plan and will frustrate implementation of that plan. Specifically, the proposed plan is at variance with General Plan policies that establish a "safe yield" ceiling for groundwater extraction, require development of a conjunctive use program with agricultural water users, require management of groundwater resources in a manner that meets the needs of "natural systems," and require new urban growth to be supplied by surface water rather than groundwater. Thus, in addition to satisfying other requirements of law, the County will need to review and adopt an amendment to the General Plan prior to the approval of the Water Supply Master Plan as drafted.

We are concerned, further, that the County may be engaged in piecemeal implementation of the draft Water Supply Plan prior to its environmental review, General Plan consistency assurance, and formal adoption. In order that we may assure ourselves of the sufficiency of environmental review of new groundwater extraction and treatment facilities, please assure that we receive copies or notice of the availability of all Notices of Preparation, Negative Declarations, and Draft Environmental Impact Reports for all groundwater-related projects south of the American River, including specifically the eight treatment projects identified at page 4-5 of the draft Water Supply Plan as being in "various stages of planning" and their associated groundwater extraction wells.

Thank you for your consideration.

Mike Eaton
Director, Cosumnes River Project

Cc: Keith Devore, Tom Hutchings



William E. Hvidsten
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Environmental Law

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Sacramento, CA 95853-7012

Tel: (916) 351-8524
Fax: (916) 355-3603

January 17, 2003

Via Facsimile

Mr. Dennis Yeast
Environmental Coordinator
County of Sacramento
827 7th Street, Room 220
Sacramento, CA 95814

Re: Notice of Preparation of a Draft EIR for 2002 Zone 40 Water Supply Master Plan

Dear Mr. Yeast:

Pursuant to your request for comments on the subject Notice of Preparation, Aerojet submits the following comments:

1. Aerojet received the notice on December 17, 2002, immediately before the holiday break. We are concerned that the time limit of 30 days to respond was insufficient given the holidays and request that the response period be extended adequately to accommodate the interruption in business schedules caused by the holiday break.
2. The Notice of Preparation states that the Zone 40 surface water supplies are proposed to be provided by, among other things, remediated groundwater that is discharged into local tributaries of the American River. Aerojet owns the treated water discharged from the various groundwater extraction and treatment systems it operates. Moreover, Aerojet would have the right to the remediated water discharged to the American River or its tributaries. Other entities, including Sacramento County, have made assertions as to the ownership of the remediated water. This matter is currently being considered by the State Water Resources Control Board in the matter styled *In the Matter of the Petition of Southern California Water Company For an Order Revising the Declaration of Full Appropriation of the Lower American River* ("FAS Proceeding"). The SWRCB will consider whether the remediated water discharged to the river is "new" water and, if so, it will then entertain petitions for appropriation of that water. Irrespective of the FAS proceeding, Aerojet is committed to replacing drinking water supplies that may be lost due to contamination emanating from its facility. Toward that end, we are in various stages of planning, designing and implementing water replacement systems that may or may not

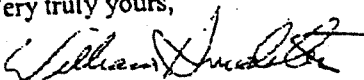
January 17, 2003
Mr. Dennis Yeast
Page Two

include surface water. The Notice should be revised to clarify that remediated water comes from several sources, both on and off Aerojet property, that Aerojet holds ownership rights in the remediated water and that others have alleged rights to that water.

3. The Notice describes the long-term average pumping yield of the basin as being 273,000 acre-feet annually. This value was a politically derived number that may not reflect the true available yield of the aquifer. The yield was derived from groundwater modeling that incorporated a number of assumptions about water use in the basin, some of which are not valid today.
4. Past evaluations made assumptions that Aerojet lands would be used primarily for industrial purposes, normally associated with relatively low water demand projections. Such assumptions are no longer valid. Aerojet's property will not be used solely for industrial use in the future. Current zoning allows for several million square feet of office space and regulatory agencies have approved over 2000 acres of Aerojet's main site for unrestricted use, which includes residential use. We expect the 13,700 acres of land owned by Aerojet to be developed similar to the surrounding land areas: predominantly residential with open space, commercial, office and industrial uses in proportion to those uses in the region. The EIR should incorporate revised projections of land use and water demand in the region.
5. Lastly, the Notice of Preparation needs to be clarified with respect to the treatment of areas that lie inside of the Sacramento County General Plan Urban Policy area, but outside the General Plan Urban Service boundaries.

We appreciate the opportunity to comment on this important document.

Very truly yours,


William E. Hvidsten

cc: William Purdy
Gregory Scott
William Phillips
Gerald Swanick



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

IN REPLY REFER TO:
Endangered Species File: 1-1-03-SP-914
PPN 2951

January 17, 2003

Mr. Dennis Yeast, Environmental Coordinator
County of Sacramento
Department of Environmental Review and Assessment
827 7th Street, Room 220
Sacramento, California 95814

Dear Mr. Yeast:

The Sacramento Fish and Wildlife Office (SFWO) of the U.S. Fish and Wildlife Service (Service) reviewed the County of Sacramento's (County) Notice of Preparation (NOP), received in our office on December 18, 2002, for a Draft Environmental Impact Report (DEIR) for the 2002 Zone 40 Water Supply Master Plan (Master Plan) (Control No. 02-PWE-0774) in Sacramento County, California. The following comments and enclosures are provided to assist you in your continued environmental review of this proposal.

The proposed 30 year Master Plan is a major endeavor which may potentially result in significant and broad ecological impacts unless major proactive planning efforts are well coordinated and implemented to protect fish and wildlife species and their habitats (including all life history stages of anadromous fish) through any modification of surface water flows and/or groundwater pumping.

Section 3406 of the Central Valley Project Improvement Act (Title 34 of Public law 102-575) amends the authorization of the Central Valley Project (CVP) to include fish and wildlife protection, restoration, and mitigation as project purposes having equal priority with irrigation and domestic uses, and fish and wildlife enhancement as a purpose equal to power generation. Section 3406(b)(1) directs the Secretary of the Interior to develop and implement a program that makes all reasonable efforts to ensure that, by 2002, natural production of anadromous fish in Central Valley rivers and streams (excluding the San Joaquin River above Mendota Pool) will be sustainable, on a long-term basis, at levels not less than twice the average levels attained during 1967-1991 and "give first priority to measures which protect and restore natural channel and riparian habitat values through habitat restoration actions, modifications to Central Valley Project operations, and implementation of the supporting measures mandated by this subsection;"

To meet the Section 3406(b)(1) directive, the Anadromous Fish Restoration Program (AFRP), led by the Service, was created to implement and guide restoration efforts for chinook salmon (*Oncorhynchus tshawytscha*), steelhead trout (*O. mykiss*), white sturgeon (*Acipenser transmontanus*), green sturgeon (*A. medirostris*), American shad (*Alosa sapidissima*), and striped bass (*Morone saxatilis*) in California's Central Valley.

The NOP states: "The focus of the DEIR is to identify the probable environmental effects as a result of the project" and "the overall impact analysis will evaluate biological resources (including impacts to Cosumnes River), land use, aesthetics, air quality, noise, traffic (construction related impacts), cultural resources, geology and soils, public health and safety, hydrology, water quality, groundwater, and utilities and service systems." It is later stated that the intended use of the DEIR would include: "The Sacramento County Water Agency will use the DEIR to consider the environmental effects, mitigation measures, and alternatives in the process of rendering a decision to approve or deny the proposed Water Supply Master Plan."

Considering the information provided in the NOP, it is unclear how "biological resources (including impacts to Cosumnes River)" and "water quality" will be evaluated in regards to the American River, the Cosumnes River, and the Sacramento River fisheries. It is critically important to carefully consider the environmental and biological needs of fish and wildlife species and then incorporate them into the Master Plan with key factors for protecting fish and wildlife. Key factors to consider for both anadromous and resident fish include: 1) upstream and downstream fish migration; 2) spawning; 3) egg incubation; 4) fry and juvenile rearing in relationship to available water flow; 5) temperature; and 6) other water quality requirements for all life stages of fish.

Recent AFRP studies reinforce the Cosumnes River's sensitivity to groundwater depletion and that its fishery is severely stressed. For example, investigations of groundwater surface water interactions along the lower Cosumnes River show that loss of baseflow contributions to the river, as a result of groundwater overdraft, are at least partly responsible for declining fall flows needed to sustain fall-run chinook salmon (Mount 2001). During November 2002, our staff and contractors observed 15 dead adult chinook salmon in the main channel of the Cosumnes River. The flows from a heavy yet brief rain event had attracted these fall-run chinook salmon. Shortly thereafter, the main river channel became dry due to percolation and stranded these fish. We anticipate that any further surface diversion or groundwater pumping will significantly compromise the sustainability of chinook salmon, Steelhead and other anadromous fish species, native fish species, and other associated water-dependent species. Of special interest, Steelhead are threatened under the Federal Endangered Species Act of 1973, as amended, and efforts to protect this species should be considered in the Master Plan.

Specific planned objectives for the AFRP have been identified and defined for the watersheds affected by the proposed Zone 40 Water Supply Master Plan and include:

Cosumnes River

- 1) The acquisition of water from willing sellers or negotiated agreements to reduce water diversions or augment instream flows during critical periods for salmonids;
- 2) Evaluate and facilitate passage of adult and juvenile salmonids at existing diversion dams and barriers; and
- 3) Determine and evaluate instream flow requirements that ensure adequate flows for all life stages of all salmonids.

American River

Develop and implement a river regulation plan that meets the following flow objectives by modifying CVP operations, using (b)(2) water, and acquiring water from willing sellers as needed:

- 1) Develop a long-term water allocation plan for the American River watershed;
- 2) Reduce and control flow fluctuations to avoid and minimize adverse effects on juvenile salmonids;
- 3) Modify the timing and rate of water diverted from the river annually to reduce entrainment losses of juvenile salmonids; and
- 4) Increase flows for American shad migration, spawning, incubation and rearing from April to June, by modifying CVP operations, by using dedicated water, and by acquiring water from willing sellers, consistent with actions to protect chinook salmon and steelhead and when hydrologic conditions are adequate to minimize adverse effects to water supply operations.
- 5) Evaluate and refine a river regulation plan that provides flows to protect all life stages of anadromous fish based on water storage at Folsom Reservoir and predicted hydrologic conditions in the American River watershed, and
- 6) Identify and implement actions that maintain mean daily water temperatures between 61°F and 65°F for at least one month from April 1 to June 30 for American shad spawning, consistent with action to protect Chinook salmon and steelhead and when hydrologic conditions are adequate to minimize adverse effects to water supply operations.

Sacramento River

We believe any future additional diversions near the mouth of the American River, or from the Sacramento River, would have potential adverse environmental effects because the river provides essential habitat for endangered winter-run chinook salmon, is the primary area of production for most species and races of anadromous fish, and is strongly influenced by operations of the CVP.

Sacramento-San Joaquin Delta

Despite its downstream location from the 2002 Zone 40 area, the Sacramento-San Joaquin Delta (Delta) may be significantly impacted by increased diversion and/or increased groundwater pumping, because: flows from upstream areas have already been dramatically reduced; the Delta is highly degraded; many anadromous and special status fish species rear in the Delta; and all anadromous fish in the Central Valley must pass through the Delta as both juveniles and adults.

Service Area Effects to Federally Listed Species

The Service would like to emphasize the importance of the completion and implementation of a regional conservation strategy by the County as a key element to address effects of urban growth to listed and special status species in the Zone 40 area. The continued delay in implementing a regional conservation strategy will affect the environmental baseline conditions used to evaluate continued water deliveries in Zone 40, including the proposed Freeport diversion facility,

Mr. Dennis Yeast

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Sacramento Water Treatment Plant Joint Project, and groundwater extractions. We are available and would like to assist the County in developing and implementing a viable regional conservation strategy.

The NOP indicates that the Near Term Zone 40 Service Boundary Area (Exhibit 3-2 of the NOP) includes parts of Mather Regional Park and the Sacramento Valley Open Space Conservancy which have vernal pool resources that are either currently protected with conservation easements and conservation banks, or which the Sacramento County Water Agency, San Juan Water District, and City of Folsom Water Service Contracts Biological Opinion, dated March 11, 1999, (Service File 97-F-0161) requires a management plan to protect vernal pool resources (e.g. Mather South Airport Area and Mather Regional Park). The SFWO is not clear why these areas are projected for water delivery.

In general, the Service requests that the County evaluate both the direct and indirect effects of the proposed project on listed and special status species and their habitats throughout the Zone 40 area. The County's determination of sustainable yield from groundwater must consider and avoid effects on threatened and endangered species and their habitats. There may be direct effects on listed and special status species and their habitats from drilling wellfields and the construction associated with water delivery and treatment. In addition, there may be indirect and consequential effects to biological resources in vernal pool complexes and within the Cosumnes River and its tributaries, from the actual extraction of groundwater and its associated hydrologic effect on surface flows, subsurface flows, and groundwater flows. For example, groundwater extractions in the Zone 40 area may decrease surface flows in the Cosumnes River and nearby tributaries, such as Badger Creek, affecting populations of federally listed giant garter snake. Groundwater extractions, such as that proposed for the North Vineyard Well Field and Facility, occurring in specific Zone 40 areas, may also affect protected vernal pool complexes supporting federally listed plant and animal species. Finally, there may be cumulative impacts to listed and special status species and their habitats within the Zone 40 study area from the urban development facilitated by the Zone 40 Master Plan.

Future consultation with the Service may be required under the Fish and Wildlife Coordination Act if project activities are anticipated to impact jurisdictional wetlands, and/or the Endangered Species Act if project activities are anticipated to affect federally listed species. Enclosure A provides a list of sensitive species that may occur in or near the project site, and Enclosure B provides general information regarding the species list. The Service recommends project site surveys be completed by a qualified biologist to confirm the presence or absence of special-status species or their habitats. Enclosure C recommends general guidelines for identifying and mitigating project impacts to fish, wildlife, and their habitats. The Council on Environmental Quality developed regulations for implementing the National Environmental Policy Act, and defines mitigation to include: 1) avoiding the impact; 2) minimizing the impact; 3) rectifying the impact; 4) reducing or eliminating the impact over time; and 5) compensating for impacts. The Service supports and adopts this definition of mitigation and considers the specific elements to represent the desirable sequence of steps in the mitigation planning process. Accordingly, we maintain the best way to mitigate adverse biological impacts is avoidance when at all possible.

The Master Plan may have direct, indirect, and cumulative impacts on listed salmonids. We recommend the County of Sacramento consult, pursuant to the Endangered Species Act, with the NOAA Fisheries, which has jurisdiction over these species.

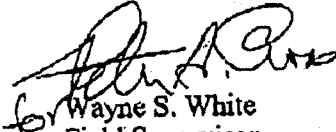
Mr. Dennis Yeast

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We request to be included in distribution lists of future notices, and since the DEIR is directly related to the Zone 40 Biological Opinion of March 11, 1999, we also request placement on the list for future mailings related to either the Master Plan or individual projects that are components of this Master Plan (e.g. the North Vineyards Wellfield Project).

We support your full consideration and evaluation of project related environmental effects and mitigation measures be included in the DEIR, and we look forward to a cooperative effort to reach the best solution for all concerned. We encourage you to use these guidelines to develop a comprehensive environmental document that addresses these needs. If you have any questions regarding these comments, please contact Mark Littlefield, Habitat Conservation Division (916) 414-6600 regarding wetland issues or Justin Ly, Endangered Species Division (916) 414-6645 regarding endangered species issues.

Sincerely,



for Wayne S. White
Field Supervisor

Enclosures (3)

cc:

AES, Portland, OR

cc (w/o enclosures):

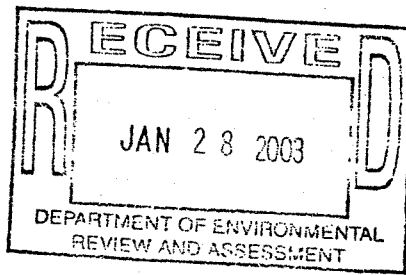
Regional Manager, CDFG, Region 2, Rancho Cordova, CA

Russell Bellmer, FWS, Stockton, CA

John Icanberry, FWS, Stockton, CA

Reference Cited

Mount, J. 2001. Linked surface water-groundwater model for the Cosumnes River watershed: hydrologic evaluation of management options to restore fall flows. U.S. Fish and Wildlife Service Anadromous Fish Restoration Program Cooperative Agreement No. 11332-8-J264. September 2001.



January 22, 2003

Mr. Dennis E. Yeast
Environmental Coordinator
County of Sacramento
Environmental Review and Assessment
827 7th Street, Room 220
Sacramento, CA 95814

SUBJECT: Response to Notice of Preparation of the Draft Environmental Impact Report for the 2002 Zone 40 Water Supply Master Plan

Dear Mr. Yeast:

Thank you for the opportunity for Southgate Recreation and Park District (District) to review and comment on the Notice of Preparation for the Draft Environmental Impact Report (EIR) for the above referenced project as a responsible agency. The District has completed its review of the Notice of Preparation and is pleased to transmit the following comments.

The Sacramento County Water Agency (Agency) provides a continuous, feasible source of irrigation water for 391 acres of parkland currently under the care and jurisdiction of the Southgate District that coincide with the proposed project area, shown as "Area of Influence" in Figure 1, Southgate Recreation and Park District Jurisdiction. Construction and operation of the proposed project has the potential to result in significant impacts to recreation facilities and parkland in response to the growth and development occurring in the South Sacramento County area.



Sheldon
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6000 Orange Avenue
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Phone 916-428-1171
Facsimile 916-428-7334
www.southgaterecandpark.net

Board of Directors
Rolfe E. Appel
John E. Cockerham
Edwin A. Smith
Christine Thompson
Shirley J. Wirth

General Manager
Rod Cooper

Assistant General Manager
Ward Winchell

Construction activities that would involve the partial or complete closure of any recreation area, any interruptions of the recreational use of paths or trails, loss of water or other public service the District relies on, or activities that generate dust and/or noise that would reduce the quality of the open space environment experienced by recreation users would be considered significant impacts by the District. The District requests that these impacts will be fully quantified, and mitigation measures evaluated to reduce the significant impacts to below the level of significance and addressed in the draft EIR.

The District would like to present specific factors related to water supply relevant to the District's operations for consideration in the Draft EIR analysis:

- The District is conscientious in its approach to water and water useage. At present, the District relies on a combination of its own wells and the availability of large volumes of water from our local water purveyor for irrigation. Since untreated water is generally available at a lower cost than would be treated water the District is always interested in utilizing untreated water for irrigation purposes only. At present, use of untreated water from a water purveyor has not been available.
- Any additional requirements related to the use of treated water, water conservation, or additional infrastructure would result in potentially significant impacts to recreation users and recreation facilities due to limiting the availability of water to adequately irrigate currently developed landscape corridors, general use turf areas, landscaped park areas, and water to community center facilities including the Wildhawk Golf Course. Future acres of parkland, scheduled for development to support future growth anticipated within the Sacramento County General Plan (General Plan) that coincide with the proposed project area (Figure 1), will also be affected.
- Should the Water Supply Master Plan facilitate growth beyond the horizon of the General Plan, the Agency will need to allow

for the appropriate additional allocation of water for future parks, in order to support the District's adopted standards for park development. The District's adopted standards are 5.0 acres of park for every 1,000 persons.

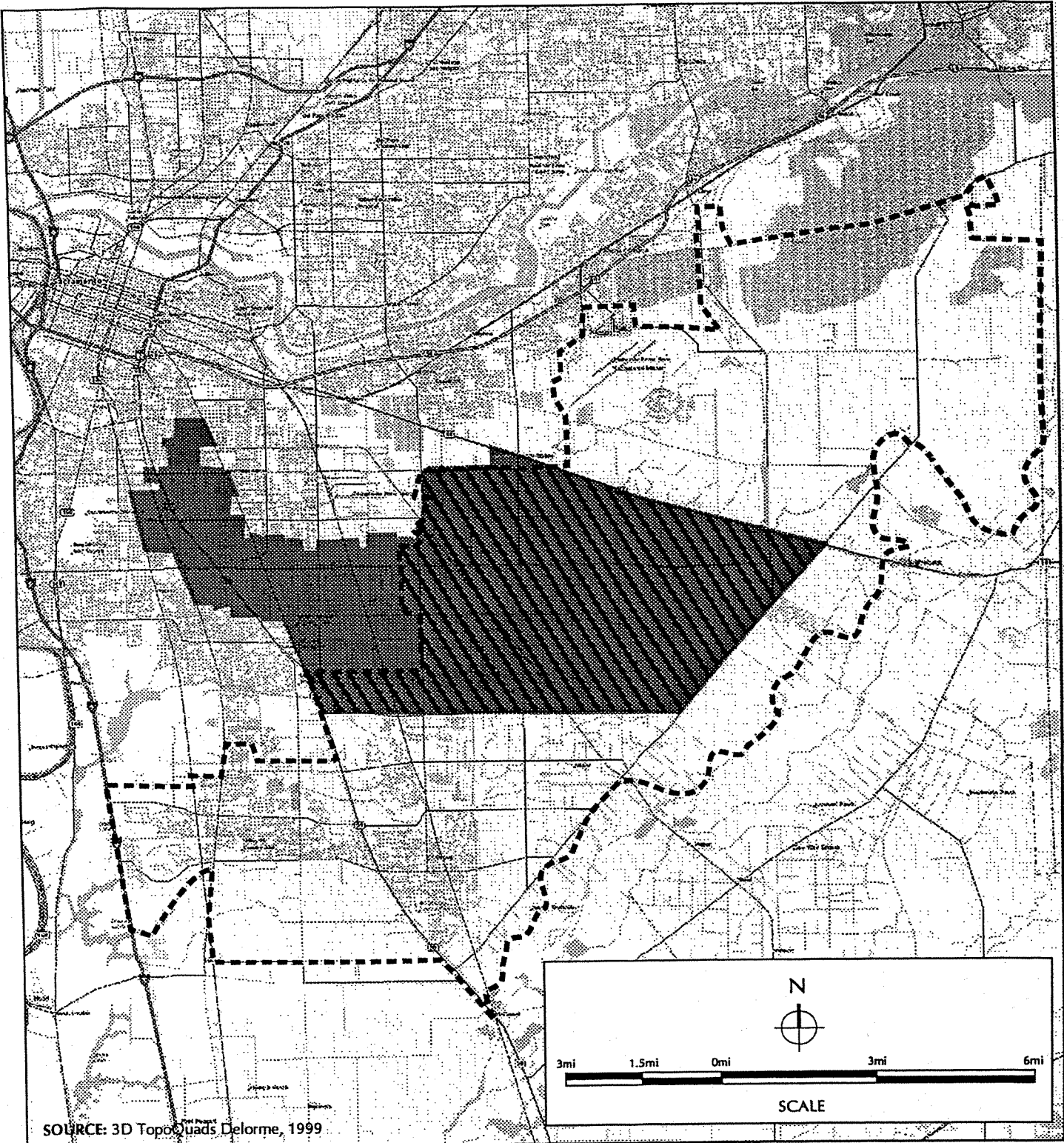
The District recommends that the proposed project be refined so that these potential impacts, described above, are avoided. Should the Agency determine that it is not feasible to avoid an impact, coordination should be undertaken with the District to evaluate all feasible mitigation measures to reduce any impacts resulting from construction and implementation of the proposed project to below the level of significance. These mitigation measures shall ensure full irrigation of both current and anticipated park facilities.

When prepared, the District would appreciate at least two copies of the Draft EIR, including all technical appendices, to be provided for our review. If you have any questions or require any additional information regarding District operations, please contact Ms. Judy Robinson at (916) 428-1171, ext. 14, or via e-mail at jrobinson@southgaterecandpark.net.

Respectfully submitted,



Rod Cooper
General Manager



LEGEND




	Zone 40 Water Supply Master Plan Area		Area of Influence
	Southgate Recreation and Park District		



FIGURE 1
Southgate Recreation and Park District Jurisdiction



Development Services

David A. Storer, AICP
Assistant City Manager

Building Safety & Inspection (916) 478-2235
Community Enhancement (916) 478-2266
Economic Development (916) 478-2261
Planning (916) 478-2265
Public Works (916) 478-2247

City Hall
8400 Laguna Palms Way
Elk Grove, California 95758
www.elkgrovecity.org

January 28, 2003

Dennis Yeast
County of Sacramento Department of Environmental Review and Assessment
827 Seventh Street, Room 220
Sacramento, CA 95814

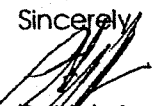
Subject: Notice of Preparation of a Draft Environmental Impact Report for the 2002 Zone 40
Water Supply Master Plan

Thank you for the opportunity to review and comment on the Notice of Preparation for the 2002 Zone 40 Water Supply Master Plan. As you are aware, the City of Elk Grove is within Zone 40 and relies on its water supply for existing and future development of the City. Our comments on the scope of the Draft EIR include the following:

- There have been several concerns expressed regarding whether increased groundwater pumping in Zone 40 would result in significant changes in surface water conditions in the Cosumnes River that could impact wetlands, riparian vegetation and other associated biological resources in the area. The NOP generally notes that this issue will be addressed. The City requests that this effect on surface water and the potential associated environmental impacts be fully explored.
- Please note that the City of Elk Grove is in the process of considering a new General Plan. A draft General Plan has been prepared and is available on the City's website (www.elkgrovecity.org). Please take this draft General Plan into account as part of the EIR analysis.
- Clearly identify any significant environmental effects associated with infrastructure improvements associated with the 2002 Zone 40 Water Supply Master Plan.

We appreciate the opportunity to comment on this NOP and look forward to reviewing the Draft EIR.

Sincerely,


Patrick Angell, AICP
Environmental Coordinator

