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## 2.0 RESPONSE TO COMMENTS

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### 2.1 COMMENTS AND RESPONSES

The following section contains comment letters and written responses to comments on the Draft EIR. CEQA Guidelines Section 15088(b) requires that responses be made to only those comments that are specific to the Draft EIR. In addition, in the court case *Browning-Ferris Industries of California, Inc. v. San Jose* (181 Cal. App. 3d 852, 1986), the court stated that the Lead Agency must respond to all significant environmental comments in a level of detail commensurate with that of the comment, citing *Gallegos v. California Board of Forestry* (76 Cal. App. 3d 945, 1978), *Twain Harte Homeowners Association v. County of Tuolumne* (128 Cal. App. 3d 664, 1982), and *Cleary v. County of Stanislaus* (118 Cal. App. 3d 348, 1981). Beyond the requirements set by CEQA and relevant court cases, every attempt has been made to respond to comments that address the project in general, in an effort to provide the most complete information possible.

**Table 2-1** lists those persons, organizations, and public agencies that provided written comments on the Draft EIR. The assigned comment letter number, letter date, letter author and affiliation with a particular organization, if presented in the comment letter or if representing a public agency, is also listed.

### 2.2 RESPONSIBILITIES OF THE COMMENTOR

CEQA Guidelines Section 15132(d) requires that the Final EIR consist of the responses of the Lead Agency to significant environmental points raised in the review and consultation process. In addition, CEQA Guidelines Sections 15201 and 15204 discuss public participation regarding the review and evaluation of EIRs. Specifically, Section 15204 states the following:

- (a) *In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR [Emphasis added].*

## 2.0 RESPONSE TO COMMENTS

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- (c) *Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to [CEQA Guidelines] Section 15064, an effect shall not be considered significant in the absence of substantial evidence.*
- (d) *Reviewing agencies or organizations should include with their comments the name of a contact person who would be available for later consultation if necessary. **Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility** [Emphasis added].*
- (e) This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.
- (f) Prior to the close of the public review period for an EIR or mitigated negative declaration, a responsible or trustee agency which has identified significant effects on the environment may submit to the lead agency proposed mitigation measures which would address those significant effects. Any such measures shall be limited to impacts affecting those resources that are subject to the statutory authority of that agency. If mitigation measures are submitted, the responsible or trustee agency shall either submit to the lead agency complete and detailed performance objectives for the mitigation measures, or shall refer the lead agency to appropriate, readily available guidelines or reference documents which meet the same purpose

**TABLE 2-1  
PUBLIC AGENCIES, ORGANIZATIONS, AND PERSONS COMMENT ON THE DRAFT EIR**

<b>Letter #</b>	<b>Date</b>	<b>Commentor</b>	<b>Affiliation</b>
1	11/30/00	Terry Roberts	State Clearinghouse
2	11/14/00	Ron Knierim, Senior Safety, Health and Environmental Specialist	Sacramento Municipal Utility District
3	11/20/00	Neal B. Allen, Senior Civil Engineer	County Sanitation District 1
4	11/20/00	George H. Booth, Associate Civil Engineer	County of Sacramento, Department of Water Resources
5	11/28/00	Phil Stafford, Associate Air Quality Planner	Sacramento Metropolitan Air Quality Management District
6	11/11/00	Greg Peterson, Principal	Citrus Heights School
7	11/28/00	Richard L. Ehrhardt, Planning Director	San Juan Unified School District
8	11/6/00	Richard L. Ehrhardt, Planning Director	San Juan Unified School District
9	11/17/00	Terry Jewell, District Administrator	Sunrise Recreation and Park District
10	11/27/00	Azadeh Doherty, Planning Manager	Sacramento Regional Transit District
11	11/29/00	George Phillips	Law Offices of George Phillips
12	11/13/00	Darlene Sedlacek	City Resident
13	11/16/00	Mrs. V. H. Montgomery	City Resident
14	11/20/00	Mrs. V. H. Montgomery	City Resident
15	11/29/00	Rebecca Cassell	City Resident
16	11/29/00	Jack E. Sales (via email)	City Resident
17	11/29/00	Jack E. Sales	City Resident
18	10/30/00	Oliver Sasse	City Resident
19	11/16/00	Mark McIntire	City Resident
20	11/14/00	Max Alexander	City Resident
21	11/16/00	Greg Rice	City Resident
PH 1		Harry Pelliccione	Planning Commissioner
PH 2		Bill Nielsen	City Resident
PH 3		Rita Rae Perry	Planning Commissioner
PH 4		Charlotte Fahland	City Resident
PH 5		Jeff Slowey	Planning Commission Chair



Gray Davis  
GOVERNOR

STATE OF CALIFORNIA

Letter I

Governor's Office of Planning and Research  
State Clearinghouse



Steve Nissen  
ACTING DIRECTOR

November 30, 2000

Janet Ruggiero  
City of Citrus Heights  
6237 Fountain Square Drive  
Citrus Heights, CA 95621

Subject: Stock Ranch Guide to Development  
SCH#: 2000032089

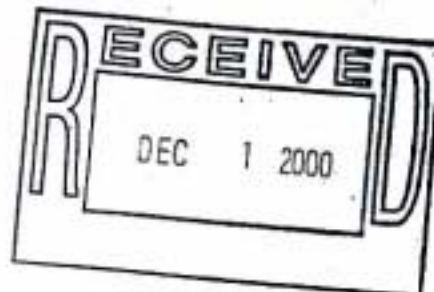
Dear Janet Ruggiero:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 29, 2000, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. | 1-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts  
Senior Planner, State Clearinghouse



Document Details Report  
State Clearinghouse Data Base

**SCH#** 2000032089  
**Project Title** Stock Ranch Guide to Development  
**Lead Agency** Citrus Heights, City of

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**Type** EIR Draft EIR  
**Description** The Stock Ranch Guide for Development would provide a land use concept, open space plan, resource management plan, circulation plan, and infrastructure and service plan for approximately 129 acres of vacant land remaining in Stock Ranch. The land use concept provides for a mix of land uses ranging from various residential densities and retail/office uses south of Arcade Creek to commercial uses north of the Creek.

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**Lead Agency Contact**

**Name** Janet Ruggiero  
**Agency** City of Citrus Heights  
**Phone** 916-725-2448  
**email**  
**Address** 6237 Fountain Square Drive  
**City** Citrus Heights  
**Fax**  
**State** CA **Zip** 95621

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**Project Location**

**County** Sacramento  
**City** Citrus Heights  
**Region**  
**Cross Streets** Auburn Boulevard / Sylvan Road  
**Parcel No.**  
**Township** 41/42N **Range** 18W **Section** 26,35 **Base** MDBM

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**Proximity to:**

**Highways** I-80  
**Airports**  
**Railways**  
**Waterways** Arcade Creek and tributaries  
**Schools**  
**Land Use** The City's Draft General Plan envisions approximately 570,000 square feet of commercial/retail/office space, up to 590 units of housing, and parks and open space of approximately 32 acres on the Stock Ranch site.

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**Project Issues** Air Quality; Archaeologic-Historic; Economics/Jobs; Flood Plain/Flooding; Drainage/Absorption; Geologic/Seismic; Job Generation; Housing; Noise; Public Services; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Cumulative Effects; Aesthetic/Visual; Soil Erosion/Compaction/Grading

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**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 2; Office of Historic Preservation; Department of Parks and Recreation; Reclamation Board; California Highway Patrol; Caltrans, District 3; Regional Water Quality Control Bd., Region 5 (Sacramento); Native American Heritage Commission; State Lands Commission

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**Date Received** 10/16/2000 **Start of Review** 10/16/2000 **End of Review** 11/29/2000

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## 2.0 RESPONSE TO COMMENTS

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Letter 1 Governor's Office of Planning and Research, State Clearinghouse, Terry Roberts, Senior Planner

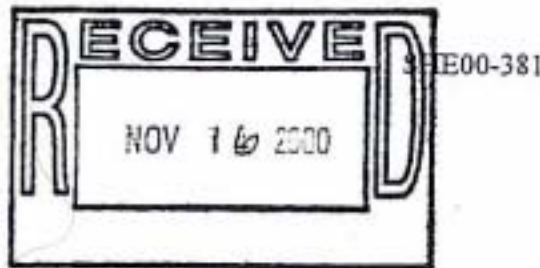
### 1-1: General Comment

Of the state agencies to which the State Clearinghouse submitted the Draft EIR for review, none submitted comments. The City acknowledges receipt of the notice of compliance.





November 14, 2000



City of Citrus Heights  
6237 Fountain Square Drive  
Citrus Heights, CA 95621

Attention: Janet Ruggiero

Re: Stock Ranch "Guide for Development, DEIR

Thank you for the opportunity to comment on the Stock Ranch Guide for Development, Draft EIR.

The Sacramento Municipal Utility District (SMUD) is the electric service provider for this area. There is installed electric service infrastructure in the immediate area that will be expanded to serve the development within Stock Ranch. Existing electrical facilities and new electrical facility needs are generally described in the DEIR page 4.11-10 *Electrical Service* and pages 4.11-15, 16 *Electrical Service*. In these sections it is determined that electrical facilities can be provided without significant impact. With dedicated PUE easements from the developer, SMUD agrees that electrical facility extensions can serve the development without significant impact. On page 4.11-16, it is noted that if there is a significant increase of office/commercial development there would be a need for a new distribution substation which can be satisfied with a parcel of approximately 100 feet per side and an overhead 69 kV line easement.

2-1

However, other sections of the DEIR and Draft Guide for Development call for all new electrical lines to be underground as well as conversion of all existing lines along Auburn Boulevard from overhead to underground. Without clarification this is in conflict with the previously mentioned sections and could impose a significant financial impact on SMUD unless mitigated as set forth on page 3 of this letter.

2-2

In *Table 2.1-2, Summary of Impacts and Mitigation Measures*, Impact 4.12.1, page 2.0-37, states:

- *Impact – The proposed project would introduce urban uses to a previously undeveloped piece of property. The placement of such uses could result in the obstruction/impairment of views from surrounding roadways and neighboring uses. This is considered a potentially significant impact.*
- *Significance Without Mitigation – Potentially Significant.*
- *Proposed Mitigation Measures – This impact can be mitigated to an acceptable level through the implementation of the Guide to Development.*
- *Significance AFTER Mitigation - Less than Significant.*

2-3



Discussion related to section 4.12 is found beginning on page 4.12-1. The pertinent Guide to Development section is found on page 78 of the *Stock Ranch Draft Guideline for Development*. That section contains the following standard/guideline:

O

*Utilities*

- *All electrical, cable, and telephone lines shall be placed underground.*
- *All existing overhead lines on Stock Ranch property along Auburn Boulevard shall be placed underground.*

**SMUD COMMENT:** The words “all electrical” and “all existing lines” fail to recognize the technical and cost differences between underground electrical 69 kV lines and 12 kV lines.

While 12 kV distribution lines may routinely be placed underground cost effectively, in newly developing areas, underground 69 kV lines generally cost more, by a factor of about 10, than the cost of overhead. The cost of underground 69 kV lines is about \$200/foot when averaging in all the necessary components. SMUD’s design guidelines call for overhead 69 kV lines. Several factors contribute to the high cost of underground 69 kV lines including:

- The need for heavily insulated cable as opposed to bare wire on insulators with overhead.
- The need to excavate for buried concrete vaults for overhead to underground transition, splice and pull boxes.
- The need for buried conduit that cannot be placed with other underground facilities.
- The need for greater separation between individual 69 kV conductors and therefore larger trenches. The need for separation between conductors and from other underground facilities may necessitate increased rights of way on private and public properties (including public roadways). While 12 kV can frequently be jointly placed in trenches with other utilities, the 69 kV suffers greater heat buildup and raises greater concern about inducing corrosion enhancing currents in other underground facilities.

The installation of new electric distribution facilities is subject to SMUD’s Rates, Rules and Regulations and other existing policies. SMUD, as a public agency, is the CEQA lead agency for new electric facilities. Pursuant to our adopted policy new 12 kV is exempt. However, new 69 kV and greater lines and substation sites are subject to our CEQA review. It is SMUD’s policy that new 12kV lines will be underground as part of our standard offering, financed primarily by the hookup fees charged for new service connections. Any existing facilities and new lines at 69 kV and above will only be underground if SMUD is reimbursed for the additional expense of underground installation.

Since the 69 kV overhead line along Auburn Boulevard is on the north side, opposite Stock Ranch then crosses diagonally to the northeast corner of Stock Ranch, then proceeds north away from Stock Ranch, SMUD assumes there is no intent to have this 69 kV line placed underground. This should be confirmed. Additionally, as acknowledged on page 4.11-16, there is a possible need for a distribution substation and an overhead 69 kV line if commercial development is more intense than currently planned. The development guidelines are in conflict with SMUD’s existing Rates, Rules and Regulations as well as with page 4.11-16 by requiring all new lines to be undergrounded.

2-4

2-5

Requiring underground 69 kV lines places a significant financial impact upon SMUD and its rate payers. If the intent is to have 69 kV lines placed underground the following mitigation measures must be added:

1. For a new 69 kV line, place it underground if the requesting agency or developer funds the additional cost for the underground line (SMUD will contribute the amount it would have spent for a new overhead line).
2. For an existing 69 kV line, place it underground if the requesting agency or developer funds the entire cost for the underground line.

#### SUGGESTED CHANGES TO DOCUMENTS:

1. Distinguish between 12 kV electrical lines and 69 kV electrical lines in the discussion in the DEIR and Development Guide, and
2. Alternative 1 If desiring underground 69 kV lines, require the developer to provide necessary easements and funding for placing the existing 69 kV line underground at Auburn Boulevard. Additionally, if the development's load requirement necessitates the additional distribution substation and 69 kV line addressed on page 4.11-16 of the DEIR, require the developer to dedicate the necessary easement and fund the placement of that new 69 kV line underground. OR  
Alternative 2, If the overhead 69 kV is acceptable change the *Stock Ranch Draft Guideline for Development* section O, Utilities (p.78) to

- *All new 12 kV electrical lines, cable and telephone lines shall be placed underground.*
- *All existing non-electrical overhead lines (cable, and telephone) on Stock Ranch property along Auburn Boulevard shall be placed underground.*
- *All existing 12 kV electrical overhead lines on Stock Ranch property along Auburn Boulevard not expected to be removed by SMUD when placing underground electric service in Stock Ranch shall be placed underground by the developer.*

Frequently for an infill development SMUD, as part of developing the underground distribution service, is able to "bridge the gap" with underground circuits and remove the abandoned overhead. However, if that overhead still serves an existing use, there will be additional costs of converting any existing customers from overhead to underground service. These costs are born by the individual customer, or other requesting party, for changes at his location, e.g. new bottom fed electric panel, the need to get an underground connection through existing landscaping, pavement, and other underground utilities. Typically, unless a developer pays the additional cost for conversion to underground service, the overhead 12 kV is retained. Since there are no overhead fed customers along the Stock Ranch portion of Auburn Boulevard, it appears at this point that:

- the pole at the northeast corner of Stock Ranch would be retained,
- the pole at the northwest corner would be retained,
- the pole located about 150 feet east of the northwest corner might have to be retained.



This would still result in the removal of 4 poles and 5 spans of overhead wires along with the removal of two transformers mounted on poles.

Additionally, the Landscape section, Section F (p.58) of the *Stock Ranch Draft Guideline for Development* should be modified such that only low growing trees are planted under any retained or new 69 kV electrical lines. SMUD can assist in selecting appropriate species.

Please send us a copy of the proposed final EIR and the date for final City adoption of the EIR.

Sincerely,



Ron Knierim

Sr. Safety, Health and Environmental Specialist  
(916) 732-6221



2-10

Letter 2 Ron Knierim, Senior Safety, Health and Environmental Specialist,  
Sacramento Municipal Utility District. November 14, 2000

**2-1: Electrical Service**

Introductory discussion of the EIR description of electrical services and possible new distribution substation. The comment does not address the adequacy of the EIR and no further response is required.

**2-2: Underground Electrical Lines**

Commentor notes that the EIR and *Guide for Development* call for all new electrical lines to be located underground. In addition, all existing lines along Auburn Boulevard are to be converted from overhead to underground lines. The Commentor states that this would result in a significant financial impact to SMUD and suggests possible mitigation measures.

In response to SMUD's concerns, the *Guideline for Development* has been revised to reflect the language recommended in comment 2-8 (i.e. 69 kV lines will not be required to be underground and the developer will be required to bear the cost of undergrounding existing 12 kV lines along Auburn Boulevard).

**2-3: Underground Electrical Lines**

See Response to Comment 2-2.

**2-4: Rates, Rules and Regulations/CEQA Review/Underground 69 kV lines**

The Commentor notes that the installation of new electric distribution facilities are subject to SMUD's Rates, Rules and Regulations; SMUD is the lead agency per CEQA for new electric facilities including new 69 kV lines and substations. New 12 kV lines will be underground as part of SMUD's standard offering. However, new lines at 69 kV or greater would be installed underground only if SMUD is reimbursed for the additional expense. As described in Response to Comment 2-2, 69 kV lines will not be required to be underground.

**2-5: Underground Electrical Lines**

See Response to Comment 2-2.

**2-6: Underground Electrical Lines**

Please see Response to Comment 2-2.

**2-7: SMUD Alternative 1**

See Response to Comment 2-2 and 2-8.

## **2.0 RESPONSE TO COMMENTS**

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### **2-8: SMUD Alternative 2**

The *Guide for Development* (p.78) has been modified to reflect the suggested text changes.

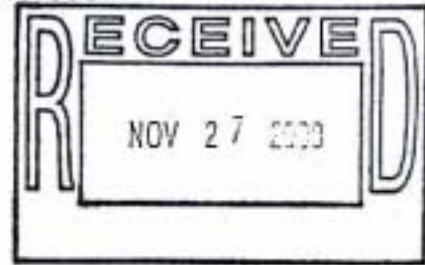
### **2-9: Fiscal Impacts**

This information is provided for the consideration of the City. Please see Response to Comments 2-2 and 2-8.

### **2-10: Landscape**

The *Guide for Development* (Appendix D) has been modified to reflect the recommended changes to the Landscape section.

November 20, 2000  
E225.000



360 Ecology Lane  
Sacramento  
California  
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Tel: (916) 875-6704  
Fax: (916) 875-6911  
Website: www.scsd.com

Janet Ruggiero  
City of Citrus Heights  
6237 Fountain Square Drive  
Citrus Heights, CA 95621

Dear Ms. Ruggiero:

**Subject: Stock Ranch "Guide for Development" General Plan Amendment and Rezone**  
**APN: 211-0280-005, 211-0270-012, 243-0010-028**

**Board of Directors**  
County of Sacramento  
Roger Dickinson  
Jill Collins  
Ariel P. Johnson  
Roger Niello  
Don Nottoli  
County of Sacramento  
Joseph N. Yee  
County of Folsom  
Tom Accituno  
County of Citrus Heights  
Roberta MacGlashan  
County of Elk Grove  
Sophia Scherman  
Warren Harada  
Agency Administrator  
Robert F. Shanks  
District Engineer  
Wendell Kido  
District Manager  
Marcia Maurer  
Chief Financial Officer

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

All prior comments sent on May 25, 2000 still apply as restated below:

In order to obtain sewer service, construction of public collector sewer will be required to the satisfaction of CSD-1. Sewer easements may be required. All sewer easements shall be dedicated to CSD-1 and ensure continuous access for maintenance. Sacramento County Improvement Standards apply to any on-site sewer construction.

3-1

An approved sewer study to the satisfaction of CSD-1 shall be required prior to submittal of improvement plans.

3-2

Developing this property may require the payment of additional sewer impact fees. Applicant should contact the Fee Quote Desk at 875-6679 for sewer impact fee information.

3-3

If you have any questions regarding these comments, please call Patrick Schroeder at 875-6865 or myself at 875-6875.

Very truly yours,

Neal B. Allen  
Senior Civil Engineer

NBA/PS:sd

cc: Patrick Schroeder

ruggiero112000.ltr.205641



## 2.0 RESPONSE TO COMMENTS

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### Letter 3 County Sanitation District 1, Neal B. Allen, Senior Civil Engineer

#### 3-1: Sewer Service

Commentor provides additional information pertinent to the discussion of wastewater service. The text on page 4.11-14 of the document has been revised as follows:

Sanitary sewer service for the project site is provided by the Sacramento Regional County Sanitation District and the County Sanitation District No. 1 (CSD-1). ***In order to obtain sewer service, an approved sewer study must be submitted to the CSED prior to submittal of project improvement plans.***

***To serve the project, a public collector sewer will need to be constructed in compliance with CSD-1 standards.*** An existing 27-inch trunk sewer is located north of Arcade Creek and a 10-inch line is located in Sylvan Road. Sewer lines to serve the portion of the project site north of Arcade Creek (i.e. the Auburn Commerce District) will tie into the existing 27-inch line. Uses south of the Creek will tie into the 10-inch line in Sylvan Road. ***Sacramento County Improvement Standards apply to any on-site sewer construction.***

***Sewer easements may be required to accommodate the new infrastructure. All sewer easements will be dedicated to CSD-1 to ensure continuous access for maintenance. In addition, the project developer would be required to pay sewer impact fees if applicable to the project.*** Therefore, impacts to wastewater collection are considered less than significant.

#### 3-2: Sewer Service

Commentor notes that a sewer study will be required by CSD-1. The text on page 4.11-14 of the document has been revised accordingly. Refer to Response to Comment 3-1, above.

#### 3-3: Sewer Service – Fiscal Impacts

Commentor notes that development of the project may require payment of sewer fees. The text on page 4.11-14 of the document has been revised accordingly. Refer to Response to Comment 3-1, above.