SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

July 24, 2023

Ron Bess, Associate Planner
City of Sacramento Community Development Department
300 Richards Boulevard, 3rd Floor, Sacramento, CA 95811

**Subject: Stone Beetland (State Clearinghouse #20223060633)**

Dear Ron Bess:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the Sustainable Communities Environmental Assessment (SCEA) for the Stone Beetland project under the California Environmental Quality Act (CEQA). The Stone Beetland project is a request to develop approximately 1,163 residential units spread between four villages, including a "Transit Village," next to the Morrison Creek Sacramento Regional Transit light rail station. Sac Metro Air District offers the following recommendations on air quality and climate considerations for project implementation and CEQA review, consistent with methods recommended in our Guide to Air Quality Assessment in Sacramento County (CEQA Guide), available on our website.

**Reactive Organic Gases**
The SCEA Table 4 shows that the unmitigated project operations would result in significant emissions of reactive organic gases (ROG), and Table 5 shows that incorporating SCEA mitigation into the project would result in less than significant operational ROG emissions. SCEA mitigation measures to reduce ROG emissions to the less than significant level include a measure to pay a mitigation fee to support programs to offset ROG emissions and a measure to utilize low-emitting paints.

- Sac Metro Air District recommends replacing the measure to utilize low-emitting paints in its current form, because the use of low-emitting paints is impracticable to enforce.
- Sac Metro Air District CEQA guidance allows for ROG mitigation to be substituted with mitigations for the other ozone precursor, oxides of nitrogen (NOx), because NOx has more ozone formation potential than ROG. The project already includes SCEA mitigation measure V-1, which reduces not only greenhouse gas emissions but also ozone precursors; however, the SCEA did not claim associated reductions. We recommend that NOx reduction from V-1 and other design features be calculated and used as a substitute for ROG reductions.
- The SCEA cites mitigation measure AIR-4 from CEQA Review for the SACOG Metropolitan Transportation Plan / Sustainable Communities Strategy, with development measures to reduce project operational emissions including ROG emissions. Should further ROG reductions be needed, we recommend selecting measures from AIR-4 to include in project-specific mitigation to reduce ROG emissions.

**Greenhouse Gases**
The SCEA indicates that greenhouse gas (GHG) emissions from project construction would be 2,238.20 metric tons yearly, which exceeds Sac Metro Air Districts 1,100 yearly metric ton significance threshold for GHG construction emissions. The SCEA cites as applicable to the project mitigation measure GHG-3, to reduce construction emissions of greenhouse gases, from CEQA Review for the SACOG Metropolitan Transportation Plan / Sustainable Communities Strategy.

- Sac Metro Air District recommends that the SCEA quantify project GHG construction emissions prior to incorporation of this mitigation, and after incorporation of this mitigation, to provide full disclosure that the project's construction related GHG emissions are less than significant with mitigation incorporated. Further, we recommend incorporating GHG-3 into the SCEA's listing of project-specific mitigation, to facilitate effective implementation.
- Additional measures, such as renewable diesel or off-site reduction credits, may be considered.

**Construction**
As a reminder, all projects are subject to Sac Metro Air District rules and regulations in effect at the time of construction. Please visit our website to find a list of the most common rules that apply at the construction phase of projects.

**Conclusion**
Thank you for your attention to our comments. If you have questions about them, please contact me at mwright@airquality.org or 279-207-1157.

Sincerely,

Molly Wright

Molly Wright, AICP
Air Quality Planner / Analyst

c: Paul Philley, AICP, Program Supervisor, Sac Metro Air District

REGIONALSAN
TAKING THE WASTE OUT OF WATER
Sacramento Regional County Sanitation District

**Main Office**
10060 Goethe Road
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July 24, 2023

Mr. Scott Johnson
City of Sacramento – Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

**Subject: Notice of Availability/Notice of Intent to Adopt a Sustainable Communities Environmental Assessment (SCEA) for the Stone Beetland Project (P21-042)**

Dear Mr. Johnson,

The Sacramento Regional County Sanitation District (Regional San) has the following comments regarding the Notice of Availability of a Sustainable Communities Environmental Assessment for the Stone Beetland Project (P21-042).

The Stone Beetland Project includes the development of the project site with approximately 1,163 residential units spread between four villages: the Transit Village, North Village, Central Village, and West Village. The project site consists of approximately 140.7 acres, located northwest of the intersection of Cosumnes River Boulevard and Delta Shores Circle South in the City of Sacramento, California.

The City of Sacramento's (City) local sewer collection system will provide local sanitary sewer service for the proposed project site. The Regional San interceptor system will provide the ultimate conveyance of wastewater from the City collection system to the EchoWater Resource Recovery Facility (EchoWater Facility) for treatment and disposal.

To receive sewer service, the project proponent must complete a Sewer Master Plan that includes connection points and phasing information to assess the capacity of the existing sewer system to accommodate the additional flows generated by this project.

In February 2013, the Regional San Board of Directors adopted the Interceptor Sequencing Study (ISS). The ISS updated the Regional San Master Plan 2000. The ISS is located on the Regional San website at www.regionalsan.com/ISS.

Regional San is not a land-use authority. Regional San plans and designs its sewer systems using information from land use authorities. Regional San bases the projects identified within its planning documents on growth projections provided by these land-use authorities. Onsite and offsite environmental impacts associated with extending sewer service to this development should be contemplated within this Environmental Assessment.

The project entitlement is conditioned to install purple piping and associated irrigation appurtenances for all open space and landscaping corridors for the future distribution and delivery of Title 22 tertiary recycled water to the project site. Language about recycled water should also be covered within this Environmental Assessment.

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

Sanitary Sewer (Page 13):

1. The project would connect to the City's sanitary sewer system through a new network of collection pipelines, laterals, and manholes (see Figure 6). The sewer system would convey wastewater from east to west and would connect to the gravity 24-inch diameter pipeline planned in 24th Street. The 24-inch pipeline would convey the wastewater to the south, across Cosumnes River Boulevard, and into Sewer Sump 53. From Sewer Sump 53, an ~~18-inch.~~ 12-inch, and 8-inch diameter force main pipelines would convey flows to the east, approximately 10,000 linear feet along the south side of Cosumnes River Boulevard, to connect to the existing ~~SCRSD~~ Regional San Central Interceptor pipeline located ~~in~~ west of Franklin Boulevard and south of Cosumnes River Boulevard. The off-site facilities would be constructed by the Delta Shores development and are part of the Delta Shores Finance Plan. The Delta Shores sanitary sewer system would provide capacity for the development of the Stone Beetland Project as presented in the Delta Shores Sewer Master Plan, dated July 23, 2014.

General Plan Amendment (Page 16):

2. (excluding the ~~SCRSD~~ Regional San parcels)

Rezone (Page 16):

3. (excluding the ~~SCRSD~~ Regional San parcels)

Figure 12 (Page 24):

4. ~~SRCSD Buffer Area~~ Regional San Bufferlands

Agricultural and Forest Resources (Page 28):

5. Comment: the remainder of the project area has also historically been used for agricultural production.

Birds and Raptors (Page 60):

6. Additionally, several large unoccupied nests were observed in eucalyptus trees located immediately north of the project site. Comment: there are known Swainson's hawk nest sites immediately to the south of the project site as well.

SCRSD Parcel (Page 61):

7. ~~SCRSD~~ Regional San Parcel.

8. Aquatic resources present on the ~~SCRSD~~ Regional San Parcel (APNs: 119-0090-014 [portion], 119-0080-001 and 119-0080-029 [portion]) are presented in Figure 14.

Title (Page 63):

9. ~~SCRSD~~ Regional San Parcel

Page 64 e.:

10. In order to identify on-site trees, arborist reports were prepared by Madrone for both the portion of the project site owned by JP Land Holdings, LLC and the ~~SCRSD~~ Regional San Parcel (see Appendix D).

Page 65 e.:

11. A total of seven native trees with a DSH greater than 12 inches were identified on the ~~SCRSD~~ Regional San Parcel (see Figure 16). Four of the seven trees would require removal as part of the project.

Title (Page 67):

12. ~~SCRSD~~ Regional San Parcel

Stormwater Drainage and Wastewater (Page 106):

13. In addition to sewer service provided by the City of Sacramento Department of Utilities (DOU), the project would also be within the Regional San service area ~~SCRSD~~. In order to be provided service by Regional San ~~to connect with the SCRSD wastewater conveyance and treatment system~~, developers must pay impact fees. In infill areas, single-family residential customers must pay $3,283 ~~3,602~~ dollars per dwelling unit.

ci-ciii. (Page 112):

14. The West Basin would receive runoff from the western DMA. Under existing conditions,

runoff from the light rail DMA is routed to a basin on the ~~SCRSD~~ Regional San Parcel.

15. As discussed further below, a portion of the project site on the ~~SCRSD~~ Regional San Parcel is located within the 100-year floodplain.

c.iv. (Page 114):

16. The southeastern corner of the project site (the ~~SCRSD~~ Regional San Parcel) is within FEMA Zone AE, which indicates areas within the 100-year floodplain. However, the ~~SCRSD~~ Regional San Parcel is intended to be used as a stormwater detention basin/open space only, and structures would not be built on the parcel. Therefore, structures would not be placed within the 100-year floodplain.

Wastewater (Page 154/155):

17. Wastewater collection and treatment services for the proposed project would be provided by the City of Sacramento DOU and ~~the SCRSD~~ Regional San. Wastewater generated from the project area is collected in the City's separated sewer system through a series of sewer pipes and flows into the ~~SCRSD~~ Regional San interceptor system, where the sewage is conveyed to the ~~Sacramento Regional Wastewater Treatment Plant (SRWTP)~~ EchoWater Resource Recovery Facility (EchoWater Facility) located near Elk Grove. Except for water diverted for recycled use, treated wastewater from the EchoWater Facility ~~SRWWTP~~ is discharged to the Sacramento River near the town of Freeport. The EchoWater Facility ~~SRWWTP~~ is currently permitted to discharge an average dry weather flow (ADWF) of 181 million gallons per day (MGD) and a daily peak wet weather flow of 392 MGD. The City's Department of Utilities is responsible for providing and maintaining the majority of the water, sewer collection, storm drainage, and flood control services for residents and businesses within City limits.

Wastewater Treatment and Conveyance Facilities (Page 160):

18. The project would connect to the City of Sacramento's sanitary sewer system through a new network of collection pipelines, laterals, and manholes. The sewer system would convey wastewater from east to west and would connect to the gravity 24-inch diameter pipeline planned in 24th Street. The 24-inch pipeline would then convey the wastewater to the south, across Cosumnes River Boulevard, and into Sewer Sump 53. From Sewer Sump 53, an ~~18-inch diameter~~ 12-inch, and 8-inch diameter force main pipelines would convey flows to the east, approximately 10,000 linear feet along the south side of Cosumnes River Boulevard, to connect to the existing Regional San ~~SCRSD~~ Central Interceptor pipeline located west of ~~in~~ Franklin Boulevard and south of Cosumnes River Boulevard.

    A Sanitary Sewer Master Plan was prepared for the proposed project (see Appendix K). 50 As part of the Sanitary Sewer Master Plan, wastewater flows to be generated by the

proposed project were estimated based on the criteria identified in the County of Sacramento Improvement Standards and Sacramento Area Sewer Design Standards. The sanitary sewer flows were estimated to be 672,709 gpd or approximately 0.67 MGD.

The existing permitted capacity at the ~~SRWWTP~~ EchoWater Facility is 181 MGD. Per the ~~SRWWTP~~ EWRRF's NPDES Permit (No. CA0077682), adopted in April of 2021, the ADWF is approximately 181 MGD. The Delta Shores sanitary sewer system has been planned to provide capacity for the development of the Stone Beetland Project as presented in the Delta Shores Sewer Master Plan, dated July 23, 2014. The approved Delta Shores Sewer Master Plan had assumed a design flow from the Stone Beetland property of 0.76 MGD, which exceeds the current estimated flows of 0.67 MGD. Accordingly, the downstream wastewater conveyance systems that have been planned and or constructed to date, as well as the EchoWater Facility ~~SRWWTP~~, have adequate capacity to accommodate flows associated with the proposed project.

Appendix K Sewer Master Plan:

19. The sewer master plan references the potential to utilize the Delta Shores capacity at the interim connection to the 96" City Interceptor. Stone Beetland will not be allowed to use the Delta Shores' interim capacity within the 96" City Interceptor. This language is to be removed from the sewer master plan.

If you have any questions regarding this letter, please feel free to contact me at (916) 876-6104 or by email at armstrongro@sacsewer.com.

Sincerely,

*Robb Armstrong*

Robb Armstrong
Regional San Development Services & Plan Check

cc: Steve Scott, Natural Resources Supervisor

24 July 2023

Ron Bess
City of Sacramento
Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
*rbess@cityofsacramento.org*

**COMMENTS TO REQUEST FOR REVIEW FOR THE SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT, STONE BEETLAND PROJECT (P21-042), SCH#2023060633, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 23 June 2023 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Sustainable Communities Environmental Assessment* for the Stone Beetland Project (P21-042), located in Sacramento County.

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

## I. Regulatory Setting

### Basin Plan

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

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

**Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

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

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

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

## II. Permitting Requirements

**Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

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

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits[1]**
The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

**Clean Water Act Section 404 Permit**
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

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

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

401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel

Peter Minkel
Engineering Geologist

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