



Final Environmental Impact Report

# Grant Line Construction Aggregate Production and Recycling Facility Project

State Clearinghouse Number 2022010079



Prepared for:



June 2023

Final Environmental Impact Report for the  
Grant Line Construction  
Aggregate Production and  
Recycling Facility Project

State Clearinghouse Number 2022010079

Prepared for:



City of Elk Grove  
8401 Laguna Palms Way  
Elk Grove, CA 95758

Contact:

Kyra Killingsworth  
Senior Planner

Prepared by:



Ascent Environmental  
455 Capitol Mall, Suite 300  
Sacramento, CA 95814

Contact:

Marianne Lowenthal  
Project Manager

# TABLE OF CONTENTS

Section	Page
<b>LIST OF ABBREVIATIONS .....</b>	<b>VI</b>
<b>1 INTRODUCTION .....</b>	<b>1-1</b>
1.1 Purpose and Intended Uses of this Final EIR .....	1-1
1.2 Project Location .....	1-2
1.3 Project Objectives.....	1-2
1.4 Summary Description of the Project.....	1-2
1.5 Major Conclusions of the Environmental Analysis.....	1-3
1.6 CEQA Public Review Process.....	1-3
1.7 Organization of the Final EIR.....	1-3
<b>2 RESPONSES TO COMMENTS.....</b>	<b>2-1</b>
2.1 List of Commenters on the Draft EIR.....	2-1
2.2 Comments and Responses.....	2-1
<b>3 REVISIONS TO THE DRAFT EIR.....</b>	<b>3-1</b>
3.1 Revisions to the List of Acronyms.....	3-1
3.2 Revisions to the Project Description .....	3-1
3.1 Project-Related Approvals, Agreements, and Permits.....	3-2
3.2 Revisions to Section 3.3. Biological Resources.....	3-2
3.3 Revisions to Section 3.9, Noise.....	3-2
3.4 Revisions to Section 3.12, Utilities .....	3-4
<b>4 REFERENCES.....</b>	<b>4-1</b>
<b>5 REPORT PREPARERS.....</b>	<b>5-1</b>

## Figures

## Tables

Table 2-1	List of Commenters.....	2-1
-----------	-------------------------	-----

## LIST OF ABBREVIATIONS

BACT	best available control technology
BMP	best management practice
CalOSHA	Division of Occupational Safety and Health of California
CalRecycle	California Department of Resources, Recycling, and Recovery
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
City	City of Elk Grove
dBA	A-weighted decibels
Draft EIR	draft environmental impact report
EMD	Sacramento County Environmental Management Department
GHG	greenhouse gas
lb/day	pounds per day
LEA	Local Enforcement Agency
$L_{eq}$	equivalent continuous sound level
LOS	level of service
PM <sub>10</sub>	respirable particulate matter with an aerodynamic diameter of 10 micrometers or less
PM <sub>2.5</sub>	fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less
Project	Grant Line Construction Aggregate Materials Production and Recycling Facility Project
SacSewer	Sacramento Area Sewer District
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
VdB	vibration decibels
VMT	vehicle miles traveled

# 1 INTRODUCTION

This response to comments document has been prepared by the City of Elk Grove (City), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (California Code of Regulations [CCR] Section 15132). It contains responses to comments received on the draft environmental impact report (Draft EIR) for the Grant Line Construction Aggregate Materials Production and Recycling Facility Project (Project). The Final EIR consists of the Draft EIR and this document (response to comments document), which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

## 1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the Project, and to provide the public with an opportunity to comment on the Draft EIR. This Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document, and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR, including Project updates, made in response to these comments and as a result of the applicant's ongoing planning and design efforts. This Final EIR will be used to support the City's decision regarding whether to approve the Project.

This Final EIR will also be used by CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit Project elements over which they have jurisdiction. It may also be used by other State, regional, and local agencies that have an interest in resources that could be affected by the Project or that have jurisdiction over portions of the Project.

The following sections identify the lead agency and responsible, trustee agencies, as well as the entitlements, approvals, and actions associated with the Project.

### 1.1.1 Lead Agency

The City is the lead agency responsible for approving the Project and for ensuring that the requirements of CEQA have been met. After the EIR public review process is complete, the City Council will determine whether to certify the EIR (see State CEQA Guidelines Section 15090) and approve the Project.

### 1.1.2 Trustee and Responsible Agencies

A trustee agency is a State agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California. The only trustee agency that has jurisdiction over resources potentially affected by the Project is the California Department of Fish and Wildlife.

Responsible agencies are public agencies other than the lead agency that have discretionary-approval responsibility for reviewing, carrying out, or approving elements of a project. Responsible agencies should participate in the lead agency's CEQA process, review the lead agency's CEQA document, and use the document when making a decision on project elements. The following agencies may have responsibility for, or jurisdiction over, the implementation of elements of the Project.

## STATE AGENCIES

- ▶ State Water Resources Control Board
- ▶ Central Valley Regional Water Quality Control Board (Region 5)

## REGIONAL AND LOCAL AGENCIES

- ▶ Sacramento Metropolitan Air Quality Management District
- ▶ Cosumnes Community Services District, Fire Department
- ▶ Sacramento County Emergency Management Department
- ▶ Sacramento Municipal Utility District
- ▶ Elk Grove Water District
- ▶ Sacramento Regional County Sanitation District
- ▶ Sacramento Area Sewer District

## 1.2 PROJECT LOCATION

The approximately 25-acre Project site is in an industrial area in the southeastern area of the City of Elk Grove, in Sacramento County (Figure 2-1). It is located at 10000 Waterman Road (Assessor's Parcel Numbers 134-0181-001, 134-0181-002, and 134-0181-003), approximately 3,000 feet north of Grant Line Road. The site is vacant, dominated by grassland, and an aging rail spur roughly bisects the property. All access to the Project site is via Waterman Road.

The Project site has a City of Elk Grove General Plan land use designation of Heavy Industrial (HI). It is bordered on the north by light and heavy industrial lands with a storage facility next door. South of the site is an asphalt plant with three large tanks and production facilities and a railroad spur. To east, across Waterman Road, are resource management and conservation lands under a Pacific Gas and Electric Company right-of-way, as well as light industrial lands. Further east are single-family residential areas. To the west is Union Pacific Railroad's 400-foot-wide right-of-way, which is designated for public service land uses. West of the right-of-way is a blend of heavy and light industrial land uses, a park, and low-density residential area.

## 1.3 PROJECT OBJECTIVES

The primary objectives of the Project are to:

- ▶ develop a concrete and asphalt recycling and production facility to serve construction projects in Elk Grove and the surrounding areas,
- ▶ develop a project that creates an industrial use on vacant land that is compatible with existing surrounding industrial uses,
- ▶ plan and develop underutilized lots in the City,
- ▶ increase the diversion of concrete and asphalt materials from landfills, and
- ▶ provide employment opportunities for residents in the City.

## 1.4 SUMMARY DESCRIPTION OF THE PROJECT

The Vulcan Materials Company (Vulcan, the applicant) is proposing to develop the Grant Line Construction Aggregate Materials Production and Recycling Facility in the southeastern edge of the City, in Sacramento County, California, just east of State Route (SR) 99. The Project would consist of an aggregate processing facility capable of processing 1.7 million tons of construction aggregate materials, including hot-mix asphalt and ready-mix concrete, annually. To produce these materials, approximately 600,000 tons of raw aggregate would be imported to the facility. Aggregate materials would be transported to the site from Vulcan's aggregate mine, located approximately 11 miles northeast of the site. The facility also would recycle asphalt and concrete from local demolition projects. Construction aggregate materials would be used to support a wide range of construction projects, including large highway paving projects.

## 1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft EIR identified that the proposed Project would not result in any significant and unavoidable impacts.

## 1.6 CEQA PUBLIC REVIEW PROCESS

On January 13, 2023, the Draft EIR was released for a 45-day public review and comment period. It was submitted to the State Clearinghouse for distribution to reviewing agencies and posted on the City's website:

<http://www.egplanning.org/environmental>. Printed copies of the document were available for review at the City Planning Division counter at 8401 Laguna Palms Way.

Comments were received from agencies and individuals on the content of the Draft EIR. Chapter 3, "Responses to Comments," identifies these commenting parties, identifies their respective comments, and presents responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (State CEQA Guidelines CCR Section 15088.5).

## 1.7 ORGANIZATION OF THE FINAL EIR

This Final EIR is organized as follows:

- ▶ **Chapter 1, "Introduction,"** describes the purpose of this Final EIR, summarizes the Project and the major conclusions of the Draft EIR, provides an overview of the CEQA public review process, and describes the content of this Final EIR.
- ▶ **Chapter 2, "Project Updates,"** presents minor updates related to the Project as a result of ongoing planning and design refinements since release of the Draft EIR.
- ▶ **Chapter 3, "Responses to Comments,"** contains a list of all parties who submitted comments on the Draft EIR during the public review period.

Responses are provided to the comments received. The chapter begins with a set of master responses that were prepared to respond comprehensively to multiple comments that raised similar issues. A reference to the master response is provided, where relevant, in responses to individual comments.

- ▶ **Chapter 4, "Revisions to the Draft EIR,"** presents revisions to the Draft EIR text made in response to comments or to amplify, clarify, or make minor modifications or corrections. Changes in the text are signified by strikeouts (~~strikeouts~~) where text is removed and by underline (underline) where text is added.
- ▶ **Chapter 5, "References,"** identifies the documents used as sources for the analysis.
- ▶ **Chapter 6, "List of Preparers,"** identifies the lead agency contacts, as well as the preparers of this Final EIR.

This page intentionally left blank.



## 2 RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on February 27, 2023. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

### 2.1 LIST OF COMMENTERS ON THE DRAFT EIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

**Table 2-1 List of Commenters**

Letter No.	Commenter	Date
<b>AGENCIES</b>		
A1	Sacramento Regional County Sanitation District (Regional San) Dillon Miele and Yadira Lewis	January 13, 2023
A2	Sacramento Municipal Utility District (SMUD) Amy Spitzer, Environmental Services Specialist	February 27, 2023
A3	Sacramento County, Solid Waste/LEA Program Eric Haupt, REHS, Environmental Specialist III	May 15, 2023
<b>INDIVIDUALS</b>		
I1	James R. Hudson	February 17, 2023
I2	James Hudson	February 17, 2023
I3	Harry and Lisa Alvis	February 25, 2023

### 2.2 COMMENTS AND RESPONSES

The written individual comments received on the Draft EIR and the responses to those comments are provided below. The comment letters are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

## 2.2.1 Agencies



CITY OF ELK GROVE DEVELOPMENT SERVICES - PLANNING  
 8401 LAGUNA PALMS WAY • ELK GROVE, CALIFORNIA 95758  
 916.478.2265 • FAX: 916.691.6411 • [WWW.ELKGROVECITY.ORG](http://WWW.ELKGROVECITY.ORG)

Letter  
 A1

### NOTICE OF AVAILABILITY

#### GRANT LINE CONSTRUCTION AGGREGATE PRODUCTION AND RECYCLING FACILITY PROJECT (PLNG21-001)

#### DRAFT ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NO. 2022010079

NOTICE DATED JANUARY 13, 2023

COMMENT PERIOD JANUARY 13, 2023, TO FEBRUARY 27, 2023

*Notice is hereby given that the City of Elk Grove, as lead agency, has prepared a Draft Environmental Impact Report (Draft EIR) for the below referenced Project. The Draft EIR analyzes the potential environmental effects associated with the proposed Project in accordance with the California Environmental Quality Act (CEQA). In accordance with Section 15087 of the CEQA Guidelines, the City of Elk Grove has prepared this Notice of Availability (NOA) to provide responsible agencies and other interested parties with notice of the availability of the Draft EIR and solicit comments and concerns regarding the environmental issues associated with the proposed Project.*

**LEAD AGENCY:** City of Elk Grove  
 Development Services, Planning Division  
 Attn: Kyra Killingsworth  
 8401 Laguna Palms Way  
 Elk Grove, CA 95758  
**Email:** [kkillingsworth@elkgrovecity.org](mailto:kkillingsworth@elkgrovecity.org)

**PROJECT TITLE:** Grant Line Construction Aggregate Production and Recycling Facility Project (PLNG21-001)

**PROJECT LOCATION:** The approximately 25-acre Project site is in an industrial area in the southeastern quadrant of the City of Elk Grove, in Sacramento County. It is located at 1000 Waterman Road (Assessor's Parcel Numbers 134-0181-042), approximately 3,000 feet north of Grant Line Road.

**PROJECT DESCRIPTION:** Vulcan Materials Company ("the Applicant") proposes to develop the Project site into an aggregate processing facility capable of processing 1.7 million tons of construction aggregate materials, including hot-mix asphalt and ready-mix concrete, annually. To produce these materials, approximately 600,000 tons of raw aggregate would be imported to the facility. Aggregate materials would be transported to the site from Vulcan's aggregate mine, located approximately 11 miles northeast of the site at 15012 Florin Road in Sacramento, California. The facility also would recycle asphalt and concrete from local demolition projects. Construction aggregate materials would be used to support a wide range of construction, including large highway paving projects. The facility would be designed to run 24 hours a day and 7 days a week. Production volumes anticipate constant operation during busy construction months of the summer and early fall. Hours during late fall, winter, and early spring are anticipated to be reduced. The Project would have the following elements: a ready-mix concrete (RMC) facility, a concrete and asphalt recycling facility, a hot-mix asphalt facility, and associated facilities including modular office buildings

Proposed City approvals for the Project include:

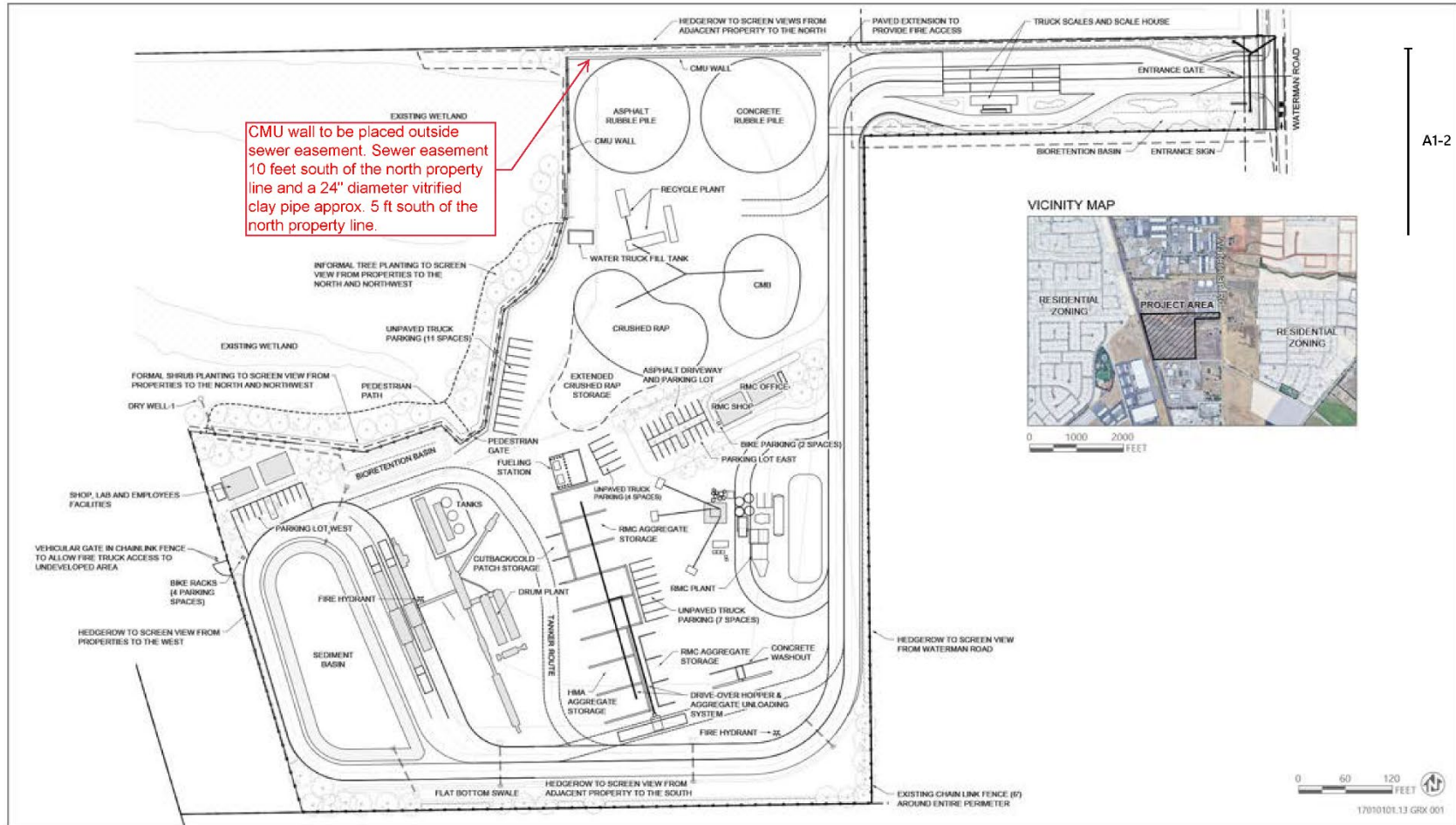
- Design Review
- Conditional Use Permit
- Tree Removal Permit

mgd	million gallons per day
MLD	most likely descendant
MPO	metropolitan planning organizations
MS4	municipal separate storm sewer systems
MTBE	methyl tert-butyl ether
MTCO <sub>2</sub> e	metric tons of carbon dioxide equivalent
MTP/SCS	Metropolitan Transportation Plan/Sustainable Communities Strategy 2035
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NO	nitric oxide
NO <sub>2</sub>	Nitrogen dioxide
NOP	notice of preparation
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
OSHA	Occupational Safety and Health Administration
ozone	photochemical smog
PM	particulate matter
PM <sub>2.5</sub>	fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less
PM <sub>10</sub>	fine particulate matter with an aerodynamic diameter of 10 micrometers or less
Porter-Cologne Act	Porter-Cologne Water Quality Control Act of 1970
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
Project	Grant Line Construction Aggregate Production and Recycling Facility Project
RCRA	Resource Conservation and Recovery Act of 1976
REC	recognized environmental conditions
Regional San	Sacramento Regional County Sanitation District
RMS	root-mean-square
ROG	reactive organic gases
RWQCB	regional water quality control boards
SACOG	Sacramento Area Council of Governments
SAFE Rule	Affordable Fuel-Efficient Vehicles Rule
SASD	Sacramento Area Sewer District's
SB	Senate Bill
SCEMD	Sacramento County Environmental Management Department
SCWA	Sacramento County Water Agency
SEL	Sound Exposure Level
SGMA	Sustainable Groundwater Management Act
SIP	State implementation plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SO <sub>2</sub>	sulfur dioxide

Replace all SASD references with SacSewer

Singular

I A1-1



A1-2

Source: Produced and provided by WRA Environmental Consultants in 2021, adapted by Ascent Environmental in 2021.

Figure 2-2 Site Plan

City of Elk Grove  
 Grant Line Construction Aggregate Production and Recycling Facility Project Draft EIR

2.4.8 Utilities

WATER

The Elk Grove Water District would provide water to the Project site via a 16-inch water main that is planned for construction on the west side of the Union Pacific Railroad track and a 12-inch water main that would extend across the railroad track and parallel to the east side of the track for a total of 1,001 linear feet. The cost of the new water main would be split between the applicant, developer to the north of the Project site, and the Elk Grove Water District located in Waterman Road. It would serve the Project site through a series of water supply pipelines sized from 10 to 12 inches in diameter. These pipelines would be used to serve the fire and domestic water needs of the Project. Water would be needed to produce ready-mix concrete at the rate of approximately 30 gallons per cubic yard of concrete produced. Assuming maximum production of 200,000 cubic yards per year, the water requirements for concrete would be about 6 million gallons annually.

Potable water is needed for the approximately 15 employees who would be working on-site at any one time. Additional water would be needed to irrigate native landscaping during the initial 3-5 years of plant establishment.

WASTEWATER

The Sacramento Area Sewer District would serve the Project site. Wastewater would be limited to that produced by the employees on-site. The Project would include installation of a minimum 6-inch lateral that would connect to SASD's trunk sewer line located in Waterman Road.

ELECTRICAL AND NATURAL GAS

The Sacramento Municipal Utility District provides the Project site from the existing 12-kilovolt facilities located at the Project site would be provided by SMUD, and the Project would be enrolled in the cent of the power used on-site is provided from renewable energy supplies. In addition, the Project would meet California Green Building Standards Code Tier 1 standards for nonresidential development.

Connection to the trunk sewer is prohibited. Place approximately 120 feet of 8" collector across property frontage on Waterman Rd and connect to that line.

The Pacific Gas and Electric Company would supply natural gas to the site.

During construction, all California Division of Occupational Health and Safety and California Public Utilities Commission safety clearance requirements related to overhead and underground facilities would be maintained.

2.4.9 Improvements to Waterman Road

Consistent with City Improvement Standards, the Project includes extension of a sidewalk, a curb, and gutters from adjacent properties along the west side of Waterman Road. In addition, a Class II bike lane would be installed along the southbound lane of Waterman Road, as identified in the City of Elk Grove Bicycle, Pedestrian, & Trails Master Plan.

2.5 PROJECT CONSTRUCTION

The general construction schedule and phasing for the Project, along with a brief description of the construction activities, equipment, materials and services, and workforce associated with Project construction, are presented below.

A1-2 cont.

### STATE

#### Urban Water Management Plan

In 1983, the California Legislature enacted the Urban Water Management Planning Act (UWMPA) (California Water Code Sections 10610–10656). The UWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that provides more than 3,000 acre-feet of water annually, should make every effort to ensure that the level of reliability in its water service is sufficient to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. This effort includes the adoption of an urban water management plan by every urban water supplier and an update of the plan every 5 years on or before December 31 of every year ending in a 5 or 0. The UWMPA has been amended several times since 1983, with the most recent amendment occurring with Senate Bill 318 in 2004. With the passage of Senate Bill 610 in 2001, additional information is required to be included as part of an urban water management plan if groundwater is identified as a source of water available to the supplier. An urban water supplier is required to include in the plan a description of all water supply projects and programs that may be undertaken to meet total projected water use.

#### California Water Code

Division 6, Part 2.10 (1995) of the California Water Code (Water Code) requires coordination between land use lead agencies and public water purveyors. The purpose of this coordination is to ensure that prudent water supply planning has been conducted and that planned water supplies are adequate to meet both existing demands and demands of planned development.

Water Code Sections 10910–10915 (inclusive) require land use lead agencies to (1) identify the responsible public water purveyor for a proposed development project and (2) request a water supply assessment (WSA) from the responsible purveyor. The objective of a WSA is to demonstrate the sufficiency of a purveyor's water supplies to satisfy the water demands of a proposed development project while still meeting the current and projected water demands of existing customers. Water Code Sections 10910–10915 delineate specific information that must be included in a WSA.

#### NPDES Permit for the Sacramento Regional Water Treatment Plant

The quality of the effluent that can be discharged to waterways in the Sacramento area by the Sacramento Regional Wastewater Treatment Plant (SRWTP) is established by the Central Valley RWQCB through waste discharge requirements (WDRs) that implement the NPDES permit. WDRs are updated at least every 5 years. A new permit must be issued in the event of a major change or expansion of the facility. In April 2016, the Central Valley RWQCB issued Order No. R5-2016-0020, NPDES No. CA 0077682, to the Sacramento Regional County Sanitation District (Regional San) for its Sacramento Regional Wastewater Treatment Plant (SRWTP), which treats wastewater from its service area before discharging the treated effluent into the Sacramento River. The water quality objectives established in the Central Valley RWQCB Basin Plan are protected, in part, by Order No. R5-2016-0020, NPDES No. CA 0077682. Currently, the SRWTP is permitted for a discharge of up to 181 million gallons per day (mgd) of treated effluent into the Sacramento River.

#### California Integrated Waste Management Act

To minimize the amount of solid waste that must be disposed of in landfills, the State Legislature passed the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) (Chapter 1095, Statutes of 1989), effective January 25 percent of all solid waste from landfill other statutes and regulations, this 50-percent production efforts must promote source reduction, and disposal.

The Central Valley RWQCB amended the NPDES Permit (R5-2021-0019-01) to include the production of recycled water by the EchoWater Project in accordance with the 2018 conditionally accepted Title 22 Engineering Report by the Division of Drinking Water.

In 2011, AB 341 (Chapter 476, Statutes of 2011) modified the act and directed the California Department of Resources Recycling and Recovery to develop and adopt regulations for mandatory commercial recycling. The resulting Mandatory Commercial Recycling Regulation (2012) requires that on and after July 1, 2012, certain businesses that generate 4 cubic yards or more of commercial solid waste per week must arrange recycling services. To comply with this requirement, businesses may either separate recyclables and self-haul them or subscribe to a recycling service

2021-0019-01

2021

A1-3

that includes mixed waste processing. AB 341 also established a statewide recycling goal of 75 percent; the 50-percent disposal reduction mandate still applies for cities and counties under AB 939.

**California Building Energy Efficiency Standards (Title 24, Part 6)**

The energy consumption of new nonresidential buildings in California is regulated by the California Energy Code (CCR Title 24 Part 6). The California Energy Code was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California’s energy consumption and to provide energy efficiency standards for residential and nonresidential buildings. CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer greenhouse gas emissions.

The 2022 California Energy Code, , applies to projects constructed after January 1, 2023. Nonresidential buildings constructed after that date are anticipated to consume 30 percent less energy as compared to nonresidential buildings constructed under the 2016 California Energy Code, primarily through prescriptive requirements for high-efficiency lighting. The Energy Code is enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary related to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in the California Energy Code.

**LOCAL**

**Sacramento**

The Sacram  
SASD publ  
the public  
assets are  
Board of D

Sacramento Regional County Sanitation District - Regional San, provides wastewater conveyance and treatment services to approximately 1.6 million residential, industrial and commercial customers throughout unincorporated Sacramento County; the cities of Citrus Heights, Elk Grove, Folsom, Rancho Cordova, Sacramento, and West Sacramento; and the communities of Courtland, Locke, and Walnut Grove.

The wastewater is collected from customers' homes and businesses via sewer collection pipes operated by one of four local sewer agencies. These pipes connect to a network of 169 miles of interceptor pipelines (sanitary sewers that are designed to carry flows in excess of 10 mgd), which convey the wastewater to the Sacramento Regional Wastewater Treatment Plant (SRWTP). There, approximately 124 million gallons of wastewater are treated each day and safely discharged to the Sacramento River.

**Sacramento**

Regional S  
mgd) and f  
and interce

Regional San sets forth requirements for use of its wastewater collection and treatment system, provides for the enforcement of these requirements, establishes penalties for violations, and establishes the rates and fees for users of the Regional San’s sewer facilities.

**City of Elk Grove General Plan**

The City’s current General Plan was amended in 2021.. The General Plan goals, policies, and standards are based on the General Plan Vision Statement and supporting principles. The following City General Plan (2021) policies are applicable to the Project. The reader is referred to Section 3.7, “Hydrology and Water Quality,” for a discussion of General Plan policies related to groundwater and water quality:

- ▶ **Policy LU-3-33:** Ensure infrastructure and facilities are planned and designed to meet projected future demands.
- ▶ **Policy LU-3-34:** Ensure backbone infrastructure and facility improvements are installed concurrent with projected development demands to meet adopted City or agency service standards or adopted work level standards.
- ▶ **Policy LU-5-12:** Integrate sustainable stormwater management techniques in site design to reduce stormwater runoff and control erosion, during and after construction.
- ▶ **Policy ER-2-17:** Require all new development projects to incorporate runoff control measures to minimize peak flows of runoff and/or assist in financing or otherwise implementing comprehensive drainage plans.
- ▶ **Policy ER-2-18:** Drainage facilities shall be properly maintained to ensure their proper operation during storms.

City of Elk Grove

Grant Line Construction Aggregate Production and Recycling Facility Project Draft EIR

3.12-3

A1-4

- ▶ **Policy NR-3-4:** Ensure adequate water supply is available to the community by working with water providers on facilities, infrastructure, and appropriate allocation.
- ▶ **Policy NR-3-9:** Reduce the amount of water used by residential and nonresidential uses by requiring compliance with adopted water conservation measures.
- ▶ **Policy NR-3-10:** Promote the use of greywater systems and recycled water for irrigation purposes.
- ▶ **Policy NR-3-13:** Advocate for native and/or drought-tolerant landscaping in public and private projects.
  - **Standard NR-3-13.a:** Require the planting of native and/or drought-tolerant landscaping in landscaped medians and parkway strips to reduce water use and maintenance costs.
- ▶ **Policy ER-6-8:** Continue to participate in the Sacramento Stormwater Quality Partnership to educate and inform the public about urban runoff pollution, work with industries and businesses to encourage pollution prevention, require construction activities to reduce erosion and pollution, and require developing projects to include pollution controls that will continue to operate after construction is complete.
- ▶ **Policy INF-1-1:** Water supply and delivery systems shall be available in time to meet the demand created by new development.
  - **Standard INF-1-1.a:** The following shall be required for all subdivisions to the extent permitted by State law:
    - Proposed water supply and delivery systems shall be available at the time of tentative map approval to the satisfaction of the City. The water agency providing service to the project may use several alternative methods of supply and/or delivery, provided that each is capable individually of delivering water to the project.
    - The agency providing water service to the subdivision shall demonstrate prior to the City's approval of the Final Map that sufficient capacity shall be available to accommodate the subdivision plus existing development, and other approved projects in the same service area, and other projects that have received commitments for water service.
    - Off-site and on-site water infrastructure sufficient to provide adequate water to the subdivision shall be in place prior to the approval of the Final Map or their financing shall be assured to the satisfaction of the City, consistent with the requirements of the Subdivision Map Act.
    - Off-site and on-site water distribution systems required to serve the subdivision shall be in place and water at sufficient quantity and pressure prior to the issuance of any building permits. Models shall be exempted from this policy as determined appropriate by the City, and subject to approval by the City.
- ▶ **Policy INF-1-2:** Require that water flow and pressure be provided at sufficient levels to meet demand for residential, commercial, industrial, and firefighting needs.
- ▶ **Policy INF-1-3:** Protect the quality and quantity of groundwater resources, including those which serve households and businesses which rely on private wells. The City shall support and participate in local efforts to implement the State's Sustainable Groundwater Management Act.
- ▶ **Policy INF-1-4:** Work with Regional San and SCWA to expand recycled water infrastructure for residential, commercial, industrial, and recreational facilities and support the use of reclaimed water for irrigation wherever feasible.
- ▶ **Policy INF-2-1:** Sewage conveyance and treatment capacity shall be available in time to meet the demand created by new development.
  - **Standard INF-2-1.a:** The following shall be required for all development projects, excluding subdivisions:
    - Sewer/wastewater treatment capacity shall be available at the time of project approval.
    - All required sewer/wastewater infrastructure for the project shall be in place at the time of project approval, or shall be assured through the use of bonds or other sureties to the City's satisfaction.
- ▶ **Policy CIF-1-1:** Facilitate recycling, reduction in the amount of waste, and reuse of materials to reduce the amount of solid waste sent to landfill from Elk Grove.

Capacity is guaranteed when Sewer Impact Fees are paid. Replace with "Sewer Impact Fees are paid."

A1-5



### 3.12.2 Environmental Setting

#### WATER SUPPLY

The Project site is located within the Elk Grove Water District (EGWD) boundary. The EGWD is a department of the Florin Resource Conservation District and operates the EGWD’s water system. The EGWD provides service to residents and businesses within an approximately 13-square-mile area within the current City limits. The service area is bounded to the north by Sheldon Road, to the east by Grant Line Road, to the south by Union Industrial Park, and to the west by SR 99. The Sheldon/Rural Area Community Plan and Eastern Elk Grove Community Plan areas are in the eastern part of the EGWD service area boundary, although no services are provided in the Sheldon/Rural Area.

The EGWD’s service area is separated into two subareas: Service Area 1 and Service Area 2. Service Area 1 relies entirely on groundwater. Service Area 2 is served by water purchased from the Sacramento County Water Agency. There are approximately 12,890 residential, commercial/institutional, irrigation, and industrial service connections (EGWD 2021: 2-1). The Project site is located within Service Area 1.

EGWD’s Service Area 1 is an independent system that is currently served wholly through groundwater deliveries from seven active wells with an operational capacity of approximately 12 mgd. This translates to an approximate total pumping capacity of 8,000 acre-feet per year (afy) with the consideration of a typical diurnal demand pattern. The groundwater system makes the supplies available in Service Area 1 100-percent reliable in all year types (i.e., normal, dry, and multiple-dry years). Although the supply of 8,000 afy is the available supply based on the groundwater basin’s sustainable yield and EGWD’s system capacity, EGWD would produce only as much water as it needs to meet demands in a particular location (EGWD 2021). Table 3.12-1 presents the last 5 years of historical supply produced by the Service Area 1 wells.

**Table 3.12-1 EGWD Service Area 1 Wells Historical Production (2016–2020)**

Year	Groundwater Production Capacity (af)	Groundwater Produced (af)
2016	8,000	3,398
2017	8,000	3,665
2018	8,000	4,036
2019	8,000	4,131
2020	8,000	4,077

Note: af = acre-feet.

Source: EGWD 2021.

#### WATER SUPPLY INFRASTRUCTURE

As discussed above, the Project site is located within EGWD’s Service Area 1. Service Area 1 is supplied by several groundwater wells that deliver water to a potable groundwater treatment plant owned and operated by EGWD. The system includes the treatment plant, two storage tanks, production wells serving the plant, and various distribution system pipes and appurtenances. The water treatment plant, referred to as the Railroad Street Treatment and Storage Facility, has a maximum daily capacity of 10.4 mgd. The facility can pump up to 16,000 gallons per minute. Groundwater is delivered to the plant from EGWD’s deep production wells, where it is treated before being delivered to customers (EGWD 2021).

#### WASTEWATER

##### ~~Sacramento Regional County Sanitation District~~

The Sacramento Regional County Sanitation District (Regional San) provides wastewater treatment for the City. It serves approximately 1.4 million residents and industrial and commercial customers, and it owns and operates the

Remove from this section as this information is captured under the "Local" section. Wastewater will be captured under SRWTP.

A1-6

regional wastewater conveyance system. Regional San manages wastewater treatment, major conveyance, and wastewater disposal (Regional San 2020).

**Sacramento Area Sewer District**

SASD serves as one contributing agency to Regional San. It provides wastewater collection and conveyance services in the urbanized unincorporated area of Sacramento County; in the Cities of Citrus Heights, Elk Grove, and Rancho Cordova; and in a portion of the Cities of Sacramento and Folsom. SASD owns, operates, and maintains a network of 4,600 miles of main line and lower lateral pipes (SASD 2022).

SASD trunk sewer pipes function as conveyance facilities to transport the collected wastewater flows to the Regional San interceptor system. The existing City trunk line extends southeast from the SRWTP influent diversion structure to Laguna Boulevard, then parallel to SR 99 along East Stockton Boulevard, extending close to the southern City boundary.

**Sacramento Regional Wastewater Treatment Plant**

The SRWTP, operated by Regional San, is located on 900 acres of a 3,550-acre site between Interstate 5 and Franklin Boulevard, north of Laguna Boulevard. The remaining 2,650 acres on the site serve as a "bufferland" between the SRWTP and nearby residential areas.

~~The SRWTP has 169 miles of pipeline.~~ Wastewater is treated by accelerated physical and natural biological processes before it is discharged to the Sacramento River (Regional San 2020).

An upgrade of the SRWTP is currently under way. The upgrade, known as the EchoWater Project, must be built by 2023 to meet new water quality requirements that were issued by the Central Valley RWQCB as part of Regional San's 2010 NPDES permit. The requirements are designed primarily to help protect the Sacramento-San Joaquin Delta ecosystem downstream by removing most of the ammonia and nitrates and improving the removal of pathogens from wastewater discharge. The upgrade will include deployment of new treatment technologies and facilities and will increase the quality of effluent discharged into the Sacramento River and ensure that the SRWTP discharge constituents are below permitted discharge limits specified in the NPDES permit. Flows to the SRWTP have decreased as a result of water conservation efforts over the last 10 years. Further, adequate capacity for wastewater treatment is anticipated well into the future. Flows in 2014 were approximately 141 mgd, compared to the current permitted capacity of 181 mgd. It is not anticipated that Regional San will need to consider further improvements to the SRWTP until after 2050.

**SOLID WASTE COLLECTION AND DISPOSAL**

Solid waste generated by commercial developments is collected and disposed of by registered commercial haulers, county-authorized recyclers, and hazardous waste materials handlers. Solid waste generated in the City is taken to a variety of landfills (City of Elk Grove 2018). Table 3.12-2 shows landfills used by the City and the permitted and remaining capacities of those landfills. As shown, most of the landfills serving City waste haulers have more than 70 percent of their capacity remaining.

portions

4,700

2023

Regional San

began operation in 1982 and is

Is this referring to the Laguna Interceptor and associated 54" trunk?

A1-6 cont.

### THRESHOLDS OF SIGNIFICANCE

A utilities and service systems impact would be significant if implementation of the Project would:

- ▶ require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
- ▶ result in insufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- ▶ result in a determination by the wastewater treatment provider that serves or may serve the Project that it has inadequate capacity to serve the Project’s projected demand, in addition to the provider’s existing commitments;
- ▶ generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure;
- ▶ negatively affect the provision of solid waste services or impair the attainment of solid waste reduction goals; or
- ▶ fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

### ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

#### Impact 3.12-1: Expansion of Infrastructure that Could Cause Adverse Environmental Effects

Infrastructure associated with the water, wastewater, stormwater, electricity, and natural gas requirements of the Project would be expanded as needed before development of the site, as a condition of approval for the Project. Connections to existing infrastructure would be expected to occur within the new on-site driveway and paved areas and would be limited to areas within the Project site. The environmental impacts related to these connections are discussed throughout this EIR in the relevant resource sections because this work would be part of the grading and construction phase of the Project. No additional utility infrastructure would be needed off-site to adequately serve the Project. This impact would be **less than significant**.

As discussed in Section 2.5.8, “Utilities,” water would be provided to the Project site by EGWD via a 16-inch water main that is planned for construction on the west side of the Union Pacific Railroad track and a 12-inch water main that would extend across the railroad track and parallel to the east side of the track for a total of 1,001 linear feet. The cost of the new water main would be split, between the applicant, developer to the north of the Project site, and the Elk Grove Water District, located in Waterman Road. In addition, wastewater pipelines would be connected to the local sewer system, SMUD would provide electricity to the Project site from existing 12-kilovolt facilities located at the northwestern corner of the site, Pacific Gas and Electric Company would supply natural gas to the site, and stormwater from a small bioretention facility would be conveyed to the City’s system along Waterman Road.

A1-7

Connections to existing infrastructure would be expected to be made within the new on-site driveway and paved areas and would be limited to areas on the Project site. The environmental effects related to these connections are discussed throughout this EIR in the relevant resource sections because this work would be part of the grading and construction phase of the Project. No additional utility infrastructure would be needed off-site to adequately serve the Project. This impact would be **less than significant**.

#### Mitigation Measures

No mitigation is required for this impact.

Construction of a collector main line is required along the parcel frontage on Waterman Road, approximately 120 feet.

## Letter A1 Sacramento Area Sewer District

Dillon Miele and Yadira Lewis

January 13, 2023

This letter consists of line edits to the Draft EIR. While the Draft EIR was submitted in its entirety as part of Sacramento Area Sewer District's (SacSewer's) comment letter, only the portions that showed changes to the document are provided above.

- A1-1 The comment suggests that the acronym for the Sacramento Area Sewer District is listed as SacSewer and that Sacramento Area Sewer District is not listed with a possessive s. The text on page vii of the Draft EIR has been modified as follows.

~~SacSewer~~SASD

Sacramento Area Sewer District's

These changes do not affect the analysis or data provided in the Draft EIR. No further changes to the document are necessary.

- A1-2 The comment provides some clarifying points related to connection to the sewer system. The text in the third paragraph on page 2-6 of the Draft EIR has been modified as follows.

### WASTEWATER

The Sacramento Area Sewer District (SASD or SacSewer) would serve the Project site. Wastewater would be limited to that produced by the employees on-site. The Project would include installation of an approximately 120-foot long 8-inch collector across the property frontage on Waterman Road a minimum 6-inch lateral that would connect to ~~SASD's SacSewer's~~ trunk sewer line manhole located in Waterman Road.

This pipeline would be located within the area of disturbance described in the Draft EIR and evaluated as part of the Project; thus, the modified text shown above does not result in a new significant impact or an impact of greater severity than disclosed in the Draft EIR. No further changes are necessary.

- A1-3 The comment provides updated information related to the National Pollutant Discharge Elimination System (NPDES) Permit for the Sacramento Regional Water Treatment Plant. The text in the fourth paragraph on page 3.12-2 of the Draft EIR has been modified as follows.

### NPDES Permit for the Sacramento Regional Water Treatment Plant

The quality of the effluent that can be discharged to waterways in the Sacramento area by the Sacramento Regional Wastewater Treatment Plant (SRWTP) is established by the Central Valley RWQCB through waste discharge requirements (WDRs) that implement the NPDES permit. WDRs are updated at least every 5 years. A new permit must be issued in the event of a major change or expansion of the facility. In April ~~2021~~2016, the Central Valley RWQCB issued Order No. ~~R5-2016-0020~~R5-2021-0019-01, NPDES No. CA 0077682, to the Sacramento Regional County Sanitation District (Regional San) for its ~~Sacramento Regional Wastewater Treatment Plant (SRWTP)~~, which treats wastewater from its service area before discharging the treated effluent into the Sacramento River. The Central Valley RWQCB amended the NPDES Permit (R5-2021-0019-01) to include the production of recycled water by the EchoWater Project in accordance with the 2018 conditionally accepted Title 22 Engineering Report by the Division of Drinking Water. The water quality objectives established in the Central Valley RWQCB Basin Plan are protected, in part, by Order No. ~~R5-2016-0020~~R5-2021-0019-01, NPDES No. CA 0077682. Currently, the SRWTP is permitted for a discharge of up to 181 million gallons per day (mgd) of treated effluent into the Sacramento River.

The modified text shown above does not result in a new significant impact or an impact of greater severity than disclosed in the Draft EIR. No further changes are necessary.

- A1-4 The comment provides suggested modifications to the text of the Draft EIR. Consistent with these recommendations, an updated approval date for SASD (or SacSewer) Standards and Specifications has been incorporated into the Final EIR. Suggested changes to the description of the Sacramento Regional County Sanitation District (Regional San) reflect information related to the wastewater treatment and conveyance system rather than the regulatory conditions associated with Regional San; thus these modifications have not been incorporated into the Final EIR. The text in the third paragraph on page 3.12-2 of the Draft EIR has been modified as follows.

## LOCAL

### Sacramento Area Sewer District Standards and Specifications

The Sacramento Area Sewer District's (~~SASD~~SacSewer's) Standards and Specifications establish minimum standards for the ~~SASD-SacSewer~~ public sewer collection system. These standards apply to planning, design, construction, and rehabilitation of the public sewer collection system that ~~SASD~~SacSewer operates and maintains. In addition the standards ensure that ~~SASD-SacSewer~~ assets are consistently designed and constructed. The Standards and Specifications were approved by the ~~SASD-SacSewer~~ Board of Directors on ~~March 13, 2019~~November 20, 2021.

The modified text shown above does not result in a new significant impact or an impact of greater severity than disclosed in the Draft EIR. No further changes are necessary.

- A1-5 The comment suggests changes to policies included in the City of Elk Grove's adopted General Plan. The policies listed in the Draft EIR are provided verbatim from the City's General Plan and are not part of the proposed Project. No changes to the document are recommended.
- A1-6 The comment suggests removing a section that describes the "Sacramento Regional County Sanitation District" because Regional San is discussed under the subheading "Local." However, the subheading "Local" addresses the regulatory setting, whereas this discussion provides an overview of the environmental setting. No changes are needed in regards to this request. This comment and comment A1-4 suggests changes to the text describing SacSewer and the Sacramento Regional Wastewater Treatment Plan (Regional San). In response to this comment, the second through fifth paragraph on page 3.12-7 has been modified as shown below.

### Sacramento Area Sewer District

SASD serves as one contributing agency to Regional San. It provides wastewater collection and conveyance services in the urbanized unincorporated area of Sacramento County; in the Cities of Citrus Heights, Elk Grove, and Rancho Cordova; and in ~~a portion~~ portions of the Cities of Sacramento and Folsom. SASD owns, operates, and maintains a network of ~~4,600~~ 4,700 miles of main line and lower lateral pipes (SASD ~~2022~~2023).

SASD trunk sewer pipes function as conveyance facilities to transport the collected wastewater flows to the Regional San interceptor system. The existing City trunk line extends southeast from the SRWTP influent diversion structure to Laguna Boulevard (i.e., the Laguna Interceptor and associated 54-inch truck line), then parallel to SR 99 along East Stockton Boulevard, extending close to the southern City boundary.

### Sacramento Regional Wastewater Treatment Plant

The ~~SRWTP~~ Regional San SRWTP began operation in 1982 and, ~~operated by Regional San~~, is located on 900 acres of a 3,550-acre site between Interstate 5 and Franklin Boulevard, north of Laguna Boulevard. The remaining 2,650 acres on the site serve as a "bufferland" between the SRWTP and nearby residential areas.

~~The SRWTP has 169 miles of pipeline.~~ Wastewater is treated by accelerated physical and natural biological processes before it is discharged to the Sacramento River (Regional San 2020).

This comment consists of editorial remarks that do not affect the analysis or data provided in the Draft EIR. No further changes to the document are necessary.

- A1-7 The comment recommends text changes to Impact 3.12-1, consistent with SacSewer's requirement to construct a 120-foot long 8-inch collector across the property frontage on Waterman Road as part of the Project. The text in the first paragraph under Impact 3.1-1 on page 3.12-9 of the Draft EIR has been modified as follows:

As discussed in Section 2.5.8, "Utilities," water would be provided to the Project site by EGWD via a 16-inch water main that is planned for construction on the west side of the Union Pacific Railroad track and a 12-inch water main that would extend across the railroad track and parallel to the east side of the track for a total of 1,001 linear feet. The cost of the new water main would be split, between the applicant, developer to the north of the Project site, and the Elk Grove Water District, located in Waterman Road. In addition, wastewater pipelines would be connected to the local sewer system via a collector main line along the parcel frontage of Waterman Road. SMUD would provide electricity to the Project site from existing 12-kilovolt facilities located at the northwestern corner of the site, Pacific Gas and Electric Company would supply natural gas to the site, and, stormwater from a small bioretention facility would be conveyed to the City's system along Waterman Road.

The modified text shown above does not result in a new significant impact or an impact of greater severity than disclosed in the Draft EIR. No further changes are necessary.

Powering forward. Together

Letter  
A2**Sent Via E-Mail**

February 27, 2023

Kyra Killingsworth  
 City of Elk Grove  
 Department of Development Services, Planning Division  
 8401 Laguna Palms Way  
 Elk Grove, CA 95758  
[killingsworth@elkgrovecity.org](mailto:killingsworth@elkgrovecity.org)

Subject: **Grant Line Construction Aggregate Production and Recycling Facility Project / EIR / 2022010079**

Dear Ms. Killingsworth:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for Grant Line Construction Aggregate Production and Recycling Facility Project (Project, SCH 2022010079). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

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

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
- <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
- <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery
- The potential need to relocate and or remove any SMUD infrastructure that may be affected in or around the project area

A2-1

More specifically, SMUD would like to have the following details from our CUP comment later dated February 23, 2021, related to the electrical infrastructure incorporated into the project description and/or the CEQA analysis:

1. SMUD has existing overhead 12kV facilities along the northwest parcel boundary that will need to remain. The Applicant shall be responsible for maintaining all CalOSHA and State of California Public Utilities Commission General Order No. 95 safety clearances during construction and upon building completion. If the required clearances cannot be maintained, the Applicant shall be responsible for the cost of relocation.
2. SMUD has planned underground 12kV facilities along northern parcel boundary that will need to remain. The Applicant shall be responsible for maintaining all CalOSHA and State of California Public Utilities Commission General Order No. 128 safety clearances during construction and upon building completion. If the required clearances cannot be maintained, the Applicant shall be responsible for the cost of relocation.
3. Any necessary future SMUD facilities located on the Applicant's property shall require a dedicated SMUD easement. This will be determined prior to SMUD performing work on the Applicant's property.
4. In the event the Applicant requires the relocation or removal of existing SMUD facilities on or adjacent to the subject property, the Applicant shall coordinate with SMUD. The Applicant shall be responsible for the cost of relocation or removal.
5. SMUD reserves the right to use any portion of its easements on or adjacent to the subject property that it reasonably needs and shall not be responsible for any damages to the developed property within said easement that unreasonably interferes with those needs.
6. The Applicant shall not place any building foundations within 5-feet of any SMUD trench to maintain adequate trench integrity. The Applicant shall verify specific clearance requirements for other utilities (e.g., Gas, Telephone, etc.).
7. In the event the City requires an Irrevocable Offer of Dedication (IOD) for future roadway improvements, the Applicant shall dedicate a 12.5-foot public utility easement (PUE) for overhead and/or underground facilities and appurtenances adjacent to the City's IOD.
8. The Applicant shall comply with SMUD siting requirements (e.g., panel size/location, clearances from SMUD equipment, transformer location, service conductors). Information regarding SMUD siting requirements can be found at: <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>.

A2-2



9. The Applicant shall dedicate a 12.5-foot public utility easement for overhead and/or underground facilities and appurtenances adjacent to all public street rights-of-ways.
10. The Applicant shall dedicate any private drive, ingress and egress easement, (and 10-foot adjacent thereto) as a public utility easement for (overhead and) underground facilities and appurtenances. All access roads shall meet minimum SMUD requirements for access roads.
11. The Applicant shall dedicate and provide all-weather vehicular access for service vehicles that are up to 26,000 pounds. At a minimum: (a) the drivable surface shall be 20-feet wide; and (b) all SMUD underground equipment and appurtenances shall be within 15-feet from the drivable surface.
12. Offsite work may be required to serve development. Typical lead time for offsite work could be in excess of 18 months depending on scope of work. Detailed load calculations for the facility should be submitted to SMUD as soon as possible to allow for a reduction in potential delays.

A2-2  
cont.

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD, and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this Project. If you have any questions regarding this letter, please do not hesitate to contact me at 916.732.5384, or by email at [Amy.Spitzer@smud.org](mailto:Amy.Spitzer@smud.org).

Sincerely,



Amy Spitzer  
Environmental Services Specialist  
Sacramento Municipal Utility District  
6201 S Street  
Sacramento, CA 95817

cc: Entitlements

## Letter A2 Sacramento Municipal Utility District

Amy Spitzer, Environmental Services Specialist

February 27, 2023

A2-1 The comment requests that impacts related to transmission and distribution lines, utility routing, electrical load needs/requirements, energy efficient, climate change, and cumulative impacts related to the need for increased energy demand of the Project are addressed. Impact 3.12-1 addresses expansion of infrastructure that could cause adverse environmental effects. As described in the ninth paragraph on page 3.12-9 of the Draft EIR, "...SMUD would provide electricity to the Project site from existing 12-kilovolt facilities located at the northwestern corner of the site." The potential cumulative effects associated with expansion of electrical infrastructure are described in Section 5.4.12 of the Draft EIR, "Utilities and Service Systems." As discussed in the third to last paragraph on page 5-20, "No additional utility infrastructure would be needed off-site to adequately serve the Project. Therefore, the Project would not combine to create considerable changes and cumulative effects related to expansion of infrastructure."

Section 3.5 of the Draft EIR, "Greenhouse Gas Emissions, Climate Change, and Energy," provides a summary of regulations applicable to greenhouse gas (GHG) emissions, a summary of climate change science and GHG sources in California, quantification of Project-generated GHG emissions and discussion about their contribution to global climate change, and analysis of the Project's resiliency to climate change-related risks. This section also contains an energy analysis pursuant to Appendices F and G of the State CEQA Guidelines, which require that EIRs include a discussion of the potential energy impacts of projects. The analysis considers whether implementing the Project would result in an environmental impact from the inefficient, wasteful, and unnecessary consumption of energy or would conflict with a plan to promote renewable energy and energy efficiency.

The comment does not provide any specific details related to the Project's effect on electrical infrastructure for which additional response can be provided. No changes to the document are necessary.

A2-2 The comment requests that details from the Sacramento Municipal Utility District's (SMUD) Conditional Use Permit letter dated February 23, 2021 are incorporated into the project description of the CEQA document, including the requirement to maintain all Division of Occupational Safety and Health of California (CalOSHA) and State of California Public Utilities Commission, the potential need for a dedicated SMUD easement, the potential for coordination of the relocation or removal of existing SMUD facilities, clearance requirement for utilities, compliance with SMUD siting requirements, easement dedication, access road dedication, and the potential for offsite work. The Draft EIR notes the existing 12-kilovolt facilities at the northwestern corner of the site in the fourth paragraph on page 2-7 of the Draft EIR and states that the project would maintain all CalOSHA and State of California Public Utilities Commission clearance requirements related to overhead and underground facilities on the sixth paragraph of page 2-7 of the Draft EIR. The Project proposes no removal or relocation of SMUD facilities and no off-site work is required. To address the potential need for further coordination with SMUD, the text in fourth paragraph on page 2-7 the has been modified as shown below.

### ELECTRICAL AND NATURAL GAS SERVICE

The Sacramento Municipal Utility District (SMUD) would provide electricity to the Project site from the existing 12-kilovolt facilities located at the northwestern corner of the site. Electrical service would be provided by SMUD, and the Project would be enrolled in SMUD's Greenergy program to ensure that 50 percent of the power used on-site is provided from renewable energy supplies. In addition, the Project would meet California Green Building Standards Code Tier 1 standards for nonresidential development.

The Pacific Gas and Electric Company would supply natural gas to the site.

During construction, the applicant would be responsible for maintaining all California Division of Occupational Health and Safety and California Public Utilities Commission safety clearance

requirements related to overhead and underground facilities ~~would be maintained.~~ The applicant would coordinate the need for easements, siting requirements, clearance requirements for utilities, and load requirements for the project prior to SMUD providing electrical provisions to the Project.

These modifications provide clarifications to the text, and identify the need to further coordination with SMUD. They would not affect the project such that new physical changes that have not been described in the EIR would occur. Thus, there would be no new significant environmental impacts or impacts of greater severity. No further changes to the document are necessary.

**Ann Edwards**  
County Executive



**Chevon Kothari**  
Deputy County  
Social Services  
Environmental Management  
Department  
**Jennea Monasterio, Director**

Letter  
A3

**County of Sacramento**

May 15, 2023

Antonio Ablog  
City of Elk Grove  
Development Services – Planning  
8401 Laguna Palms Way  
Elk Grove, CA 95758

Dear Antonio Ablog:

**SUBJECT: LEA COMMENTS ON GRANT LINE CONSTRUCTION AGGREGATE PRODUCTION AND RECYCLING FACILITY PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT, ELK GROVE, CALIFORNIA**

**Authority and Background**

The Sacramento County Environmental Management Department (EMD) is the Local Enforcement Agency (LEA) for the California Department of Resources, Recycling, and Recovery (CalRecycle). As such, the LEA enforces Title 14 and 27 of California Code of Regulations (CCR) governing solid waste disposal and solid waste facilities in Sacramento County. This includes facilities that handle construction and demolition debris, and inert debris.

On April 26, 2023, LEA staff received an email from City of Elk Grove requesting LEA review and comment on the Draft Environmental Impact Report (DEIR) for the proposed Grant Line Construction Aggregate Production and Recycling Facility Project, to be at 10000 Waterman Road, Elk Grove (APN 134-0181-042-000). The project overview described in the DEIR indicates that the facility would include a ready-mix concrete facility, a concrete and asphalt recycling facility, a hot-mix asphalt facility, and associated facilities including modular office buildings. According to page ES-2 of the DEIR, the recycling aspect of the project would entail processing broken asphalt and concrete brought to the facility from outside sources.

**LEA Comments**

Based upon the information provided in the DEIR and 14 CCR 17381.1, the proposed concrete and asphalt recycling plant may qualify as an inert debris recycling center. As such, the proposed inert debris recycling center may not be subject to the State’s Construction and Demolition/Inert Debris Regulatory Requirements and LEA oversight if it meets the following requirements:

A3-1

11080 White Rock Road, Suite 200 \* Rancho Cordova, CA 95670 \* fax (916) 875-8513  
Environmental Compliance (916) 875-8550 \* Environmental Health (916) 875-8440  
saccounty.gov \* emd.saccounty.gov

- 
- 1) The facility only receives Type A inert debris that is source separated or separated for reuse. The inert debris may be commingled in a single container.

Pursuant to 14 CCR 17381(k)(1), "Type A inert debris" includes but is not limited to concrete (including fiberglass or steel reinforcing bar embedded in the concrete), fully cured asphalt, glass, fiberglass, asphalt or fiberglass roofing shingles, brick, slag, ceramics, plaster, clay and clay products.

- 2) Residual wastes from accepted inert debris shall be less than 10% by weight of the amount of debris received at the site, calculated on a monthly basis. Recycling center operators may report their residual percentage to the LEA and CalRecycle.

- 3) The amount of putrescible waste in the received inert debris shall be less than 1% by volume of the amount of debris received at the site, calculated on a monthly basis, and the putrescible wastes shall not constitute a nuisance, as determined by the LEA.

- 4) Pursuant to 14 CCR 17381.1(e)(3), maximum storage limits for unprocessed and processed inert material are not applicable so long as the facility meets the definition of a Material Production Facility as defined in 14 CCR 17381(r).

Please note that pursuant to 14 CCR 17381.1(f), nothing in the aforementioned regulatory sections precludes the LEA or CalRecycle from inspecting the site to verify that it is and has been operating in a manner that meets the requirements of the section, or from taking any appropriate enforcement action, including the use of a Notice and Order as provided in 14 CCR 18304.

A3-1  
cont.

**Contact**

If you have any questions regarding this letter, please contact me at (916) 591-0932, or via email at [haupte@saccounty.gov](mailto:haupte@saccounty.gov).

---

Sincerely,



Eric Haupt, REHS  
Environmental Specialist III  
Solid Waste/LEA Program

RG:EH

W:\Solid Waste\LEA\_Solid Waste Facilities\Grant Line Construction Aggregate Production and Recycling Facility Project\2023-05-12 Grant Line DEIR Review.docx

## Letter A3 Sacramento County Environmental Management Department

Eric Haupt, Environmental Specialist

May 15, 2023

A3-1 The comment provides an overview of the authority and background of the Sacramento County Environmental Management Department's (EMD's) role as the Local Enforcement Agency (LEA) for the California Department of Resources, Recycling, and Recovery (CalRecycle) and provides a summary of the State's Construction and Demolition/Inert Debris Regulatory Requirements and LEA oversight roles. This comment consists of operational requirements that would be enforced through the eventual solid waste/recycling permitted that would be issued by EMD as the LEA. In response to this comment, the text on page 2-9 has been modified as follows.

### 2.1 PROJECT-RELATED APPROVALS, AGREEMENTS, AND PERMITS

The Sacramento County Environmental Management Department (EMD) is the Local Enforcement Agency (LEA) for the California Department of Resources, Recycling, and Recovery (CalRecycle). The LEA enforces Title 14 and 27 of California Code of Regulations (CCR) governing solid waste disposal and solid waste facilities in Sacramento County. This includes facilities that handle construction and demolition debris and inert debris. EMD as the LEA may issue a permit if the facility meets certain requirements and would inspect the facility to verify that it is and has been operating in a manner that meets the requirements of Title 14 Division 7 Section 17381.1 of the California Code of Regulations.

As the lead agency under CEQA, the City of Elk Grove is responsible for considering the adequacy of this EIR and determining whether the Project should be approved and issued a Conditional Use Permit.

The following discretionary actions and permits are anticipated for the proposed Project.

- ▶ Central Valley Regional Water Quality Control Board: Waste Discharge Requirements
- ▶ Sacramento Metropolitan Air Quality Management District: Clean Air Act compliance
- ▶ City approval of Design Review
- ▶ City approval of a Conditional Use Permit
- ▶ City approval of a Tree Removal Permit
- ▶ ~~Sacramento County Water Agency~~ Elk Grove Water District: approval of water supply distribution facility improvements
- ▶ Sacramento Area Sewer District: approval of wastewater conveyance facility improvements
- ▶ Sacramento Municipal Utility District: approval of electrical conveyance facility improvements
- ▶ Sacramento Metropolitan Air Quality Management District: approval of an Authority to Construct and Permit to Operate
- ▶ Sacramento County Environmental Management Department solid waste/recycling permit.

This modification expands the list of potential project-related approvals, agreements, and permits. It would not result in a new significant impact or impact of greater severity. No specific environmental issues pertaining to the content of the EIR are addressed in this comment for which a further response can be provided.

## 2.2.2 Individuals

### Kyra Killingsworth

Letter  
I1

**From:** James Hudson <jrh68@comcast.net>  
**Sent:** Friday, February 17, 2023 4:09 PM  
**To:** Kyra Killingsworth  
**Cc:** Sarah Kirchgessner  
**Subject:** dEIR for the Vulcan Materials project (Grant Line Construction Aggregate Production and Recycling Facility Project)  
**Attachments:** Vulcan\_Materials.pdf

You don't often get email from jrh68@comcast.net. [Learn why this is important](#)

[EXTERNAL EMAIL]

Hi Kyra and Sarah,

I have sent a hard copy mail out today with the following attached letter and pictures. You should receive it before Feb 27th at the 5pm deadline.

Please take no offense it is not meant as an attack on any of you personally. I liked meeting you both (one in person, the other virtually), along with the others in the previous meeting. But I felt I had to state my true feelings in this matter of the Vulcan Materials proposal and dEIR. I've also included a bit more historical information on how we had tried to work with the City of Elk Grove in the past and why we find ourselves so frustrated now in the present. It's my hope that the included information helps explain why we feel the way we do, and why we might appear to display emotional irritation with the City of Elk Grove at times.

Again, my apologies if I had seemed irritated in our last meeting. We do appreciate your time in setting up the meeting and taking the time to attend and explain the information to us.

Sincerely,

James R Hudson  
408-398-4730



I1-1



I1-1  
cont.



**Letter I1 James R. Hudson**

February 17, 2023

- I1-1 The comment expresses general concerns and provides photos of unknown facilities. No specific environmental issues pertaining to the content of the EIR are addressed in this comment for which a further response can be provided.

Letter  
12

**City of Elk Grove**  
**Development Services, Planning**  
**Attn: Kyra Killingsworth**  
**8401 Laguna Palms Way**  
**Elk Grove, CA 95758**  
**Email: [kkillingsworth@elkgrovecity.org](mailto:kkillingsworth@elkgrovecity.org)**  
**Cc: [skirchgessner@elkgrovecity.org](mailto:skirchgessner@elkgrovecity.org)**

We are opposed to the draft Environmental Impact Report “Grant Line Construction Aggregate Production and Recycling Facility Project” being proposed by Vulcan Materials Company. 12-1

Elk Grove planning has already given the green light to the Waterman Brinkman Logistics Center, and we believe the Waterman 20 project. All this development directly impacts our property at 10001 Waterman Rd. 12-2

We had lived for years with a major polluter CB Hobbs which was then purchased by Kingsford briquette. My mother died from COPD, and we believe it was primarily from breathing the charcoal dust generated from the Briquette factory. No matter what the paid for experts say in the dEIR, if Vulcan Materials is allowed to proceed with this project it will cause major impact on noise, concrete dust, and traffic right across from our property. 12-3

The proposed dEIR states on ES.2.3 “**The facility would be designed to facilitate production operations 24 hours a day**”. This means they will be moving asphalt and concrete raw materials 24/7. Grinding and auguring raw materials day and night... I strongly urge you to go to Vulcan Materials Web site and look at one of their pictures of their recycling plants. Notice the plume of cement dust. The winds will cause the existing housing developments to the west and east to be in the concrete dust plume. 12-4

Then I strongly ask you to consider if you would live at 10001 Waterman Road near one of these processing plants. Our driveway is right across from the proposed entrance to the project. 12-5

Our parents when Elk Grove contacted them and wanted to build a Storm Drainage Basin Pond on our property, we worked with the City Engineer and McKay&Soms and allowed the Farm to be parceled to accomplish Elk Grove’s desires. It was Elk Grove that wanted to place the retention pond where it is today. In retrospect, the retention pond should have gone on the 3.5-acre parcel (0134-0110-127). But the Elk Grove Engineer preferred placing it where it is today. This left our family with a parcel that is zoned MP/OS and in the FEMA 100-year flood plain. We feel that Elk Grove probably had realized this at the time it was done and that it would leave us with a problem if we ever tried to sell that parcel. We were also stuck paying the yearly TAX bill on this small parcel. 12-6

Now Elk Grove tells us that they value land zoned as MP/OS and that they are very particular about what will be allowed to go in there and that a CUP will probably be required for any building, also no building can really go in due to the fact it's in the FEMA flood zone. We have had several offers on this small parcel, with the buyers walking away after talking with Elk Grove Planning. We had a meeting with Elk Grove (you) on Feb. 7<sup>th</sup>, 2023, about this. Our realtor no longer thinks a sale is likely. We're still left wondering what Elk Grove's purpose/desire on this is. Could it be the City of Elk Grove is waiting for us to donate the property to the City for a Park or Open Space? (This was mentioned to me as an option by one of the City Council members outside at the Buzz Oates Brinkman project meeting 5/8/22 when I jokingly said Buzz Oates should buy it and move the 23 endangered trees to our parcel. One Council member was concerned about the safety of the Trees on the Brinkman project).

12-6  
cont.

If Vulcan Materials is allowed to proceed and put in the Concrete Recycling Plant, this might be the last straw that may cause/force us to sell our property due to the above negative aspects. I hope when we do decide to sell the 9-acre parcel (134-0110-156) at 10001 Waterman Road, you will take this into consideration that our property won't be fit for residential (because no one will want to live across from this) and you will give us consideration if the buyer wants variants or approval for a CUP for the desired MP/PR usage.

12-7

Thank you,

James Hudson  
Cell# 408-398-4730  
02/17/2023

**Letter I2 James Hudson**

February 17, 2023

- I2-1 The comment expresses general opposition to the Project. No specific issues pertaining to the content of the EIR are addressed in this comment for which a further response can be provided.
- I2-2 The comment states that other approved development near to the Project site is affecting the commenter's property. No specific issues pertaining to the content of the EIR are addressed in this comment for which a further response can be provided.
- I2-3 The comment states that the Project would cause impacts on noise, concrete dust, and traffic.

Project-related noise impacts are addressed in Section 3.9 of the Draft EIR, which is based on technical analysis provided in Draft EIR Appendix D. As discussed under Impact 3.9-1, construction-generated noise levels would not result in exceedance of City noise standards at any nearby receptors or result in a substantial increase in noise levels that would affect area residents (see pages 3.9-15 through 3.9-17 of the Draft EIR). As discussed under Impact 3.9-3 (pages 3.9-18 through 3.9-19 of the Draft EIR), predicted increases in traffic noise levels associated with development under the Project would not exceed any of the City's incremental noise increase standards listed in General Plan Policy N-2-2 (note that City transportation noise exposure standards do not have separate daytime or nighttime levels identified in the General Plan). In regard to operational noise, as discussed under Impact 3.9-4 (pages 3.9-19 through 3.9-22 of the Draft EIR), the predicted daytime and nighttime noise levels associated with on-site equipment would not exceed the City's noise standards of 60 equivalent continuous sound level ( $L_{eq}$ ) A-weighted decibels (dBA) and 50  $L_{eq}$  dBA set forth in the Elk Grove Municipal Code Chapter 6.32 for daytime and nighttime hours, respectively. Additionally, sleep disturbance impacts were evaluated and considered to be potentially significant if the single-event noise level resulting from the project would exceed 65 dB sound exposure level (SEL) within interior areas of residences not currently exposed to appreciable nighttime single-event noise, consistent with studies prepared by the Federal Interagency Committee on Aviation Noise (FICAN 1997). As discussed in Impact 3.9-4, the estimated project-induced SEL levels at nearby residential uses would not exceed the applicable criteria of 65 dBA SEL. However, due to uncertainties surrounding the timing and intensity of use of on-site equipment at the facility, these noise standards could be exceeded from Project operation and may generate single event noise conditions that could create sleep disturbance for sensitive receptors in the area. Noise control measures are provided in Mitigation Measure 3.9-4 to reduce impacts to a less-than-significant level (see pages 3.9-19 through 3.9-22 of the Draft EIR), and include: limiting operating hours of facility operations; requirements for design and maintenance of the on-site equipment; use of growler-type backup warning systems for mobile plant area equipment, rather than conventional beeping systems; and further noise monitoring testing until noise levels can be shown to be in compliance with City standards. These mitigation measures would ensure that noise standards would not be exceeded and that noise levels at nighttime would not disturb sleep at nearby sensitive receptors. The commenter provides no evidence or analysis that counter the conclusions of the Draft EIR regarding noise impacts.

Section 3.2 of the Draft EIR, "Air Quality," addresses the air quality impacts that would occur during construction and operation of the Project, which is based air quality modeling and technical analysis provided in Draft EIR Appendix B. As discussed under Impact 3.2-1 (page 3.2-12 through 3.2-14) and 3.2-2 (page 3.2-14 through 3.2-17), the Project would result in potentially significant impacts to air quality during construction and operation, respectively. Mitigation Measures 3.2-1 and 3.2-2, applicable to both Impact 3.2-1 and 3.2-2, would adjust Sacramento Metropolitan Air Quality Management District's (SMAQMD) thresholds of significance for respirable particulate matter with an aerodynamic diameter of 10 micrometers or less ( $PM_{10}$ ) and fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less ( $PM_{2.5}$ ) to 80 and 82 pounds per day (lb/day), respectively. Mitigation Measure 3.2-1, which requires implementation of best management practices (BMPs), would reduce construction-related  $PM_{10}$  and  $PM_{2.5}$  emissions by approximately 54 percent to 8 and 4 lb/day, respectively. Operational project emissions after implementation of Mitigation Measure 3.2-2 would be lower than pre-mitigation emission levels of 50 lb/day of  $PM_{10}$  and 15

lb/day of PM<sub>2.5</sub>, which are below SMAQMD's operational emissions thresholds of significance of 80 PM<sub>10</sub> and 82 lb/day PM<sub>2.5</sub> (SMAQMD's thresholds when BMPs and best available control technologies (BACTs) are applied). These levels of emissions are below SMAQMD's operational emissions thresholds of significance (80 PM<sub>10</sub> and 82 lb/day PM<sub>2.5</sub>) used following implementation of BMPs and BACT. Therefore, this impact would be less than significant with mitigation. The commenter provides no evidence or analysis that counter the conclusions of the Draft EIR regarding air quality impacts.

Section 3.11 of the Draft EIR, "Transportation," and Draft EIR Appendix E addresses the effects on transportation from implementation of the Project. Beginning on July 1, 2020, agencies analyzing the transportation impacts of new projects must consider the change to vehicle miles traveled (VMT) instead of level of service (LOS). VMT measures how much actual auto travel (additional miles driven) a project would create on California roads, whereas LOS addresses issues of congestion. As discussed under Impact 3.11-2 (pages 3.11-15 through 3.11-16 of the Draft EIR), the Project is exempt from VMT analysis pursuant to the City's Transportation Analysis Guidelines and is presumed to result in a less-than-significant impact. Note that the exemption is provided because a project located within a low VMT area would not exceed the City's efforts in meeting its VMT targets. The commenter provides no evidence or analysis that counter the conclusions of the Draft EIR regarding air quality impacts.

Because issues related to noise, concrete dust, and traffic are addressed in the Draft EIR, as described above, no changes to the document are necessary.

- I2-4 The comment expresses concerns related to air quality emissions, particularly cement dust. Section 3.2 of the Draft EIR, "Air Quality," addresses the air quality impacts that would occur during construction and operation of the Project. As discussed under Impact 3.2-2 (page 3.2-14 through 3.2-17), the Project would result in potentially significant impacts to air quality during operation; however, Mitigation Measures 3.2-1 and 3.2-2, applicable to Impact 3.2-2, would adjust SMAQMD's thresholds of significance for PM<sub>10</sub> and PM<sub>2.5</sub> to 80 and 82 lb/day, respectively. Mitigation Measure 3.2-1, which requires implementation of BMPs, would reduce construction-related PM<sub>10</sub> and PM<sub>2.5</sub> emissions by approximately 54 percent to 8 and 4 lb/day, respectively. Operational project emissions after implementation of Mitigation Measure 3.2-2 would be lower than pre-mitigation emission levels of 50 lb/day of PM<sub>10</sub> and 15 lb/day of PM<sub>2.5</sub>, which are below SMAQMD's operational emissions thresholds of significance of 80 PM<sub>10</sub> and 82 lb/day PM<sub>2.5</sub> (SMAQMD's thresholds when BMPs and BACTs are applied). These levels of emissions are below SMAQMD's operational emissions thresholds of significance (80 PM<sub>10</sub> and 82 lb/day PM<sub>2.5</sub>) used following implementation of BMPs and BACT. Therefore, this impact would be less than significant with mitigation.
- I2-5 The comment expresses general concerns for the living conditions near the Project. The Draft EIR analyzes effects on the areas surrounding the Project site during construction and operation, including in Section 3.1, "Aesthetics," Section 3.2, "Air Quality," Section 3.9, "Noise," and Section 3.11, "Transportation," which includes a discussion of traffic safety issues. No specific issues pertaining to the content of the EIR are addressed in this comment for which a further response can be provided.
- I2-6 The comment provides information related to agreements made between the City and commenter concerning construction of a storm drainage basin pond. This comment does not pertain to the Project. No specific environmental issues related to the content of the EIR are addressed in this comment for which a further response can be provided.
- I2-7 The comment expresses general concerns for the living conditions near the Project. No specific environmental issues pertaining to the content of the EIR are addressed in this comment for which a further response can be provided.

**Kyra Killingsworth**

**Letter  
13**

**From:** Ed - Lisa Alvis <voomone@hotmail.com>  
**Sent:** Saturday, February 25, 2023 1:07 PM  
**To:** Kyra Killingsworth  
**Subject:** Project PLNG21-001 Comment

You don't often get email from voomone@hotmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

After reviewing a copy of the draft EIR for the above-mentioned project and as a homeowner that will be affected by this project, I am drafting my comments/concerns via this email.

My property is located directly west of the proposed project and there are several concerns that I'd like to express:

- Noise-noise from an operation that will run 24/7 is not acceptable in a neighboring residential area. Crushing equipment is extremely loud, loud enough that machine operators must wear protective earplugs or covers. Tractor trailer rigs coming, going, and just idling are loud. Yes, there is a train track that operates 24/7 but there are hours of breaks in between so you are provided respite from the noise. This operation will not provide any breaks as the nature of that business is a 24/7 operation. 13-1
- Vibration-vibrations from a 24/7 operation, whether its from its large tractor trailer rigs or the vibration of the crushing machinery. If I can see the vibration on my windows and feel the vibration, I have no doubt this project will also be felt and seen around my home. 13-2
- Dust-dust is another issue with the proposed project. All the equipment, loading, off-loading, materials being conveyed from one area to the next will produce and release additional dust in the air. I have a whole house fan that is used for cooling my home during the warmer weather which will now be pulling not only more dust into my home but additionally the intake could be potentially more hazardous due to the contents of the materials being crushed. 13-3
- Home valuation-as a homeowner being surrounded by an industrial area is not necessarily a bad thing BUT being surrounded by a noisy, smelly, and dusty industrial area automatically reduces my home value and limits potential buyers. 13-4

There are other areas within this community and surrounding communities that would be better suited for a loud and busy 24/7 operation. 13-5

A question I have and would like a response to, was there a publicly held meeting that I could have attended and been more informed on this particular plan other than just receiving this notice in the mail? 13-6

Thank you,

Harry & Lisa Alvis  
9141 Falcon Creek Cir  
Elk Grove, CA 95624  
[voomone@hotmail.com](mailto:voomone@hotmail.com)

## Letter I3 Harry and Lisa Alvis

February 25, 2023

- I3-1 The comment addresses concerns related to operational noise levels. Project-related noise impacts are addressed in Section 3.9 of the Draft EIR and Appendix D. As discussed under Impact 3.9-3 (pages 3.9-18 through 3.9-19 of the Draft EIR), noise impacts related to the operation of the Project would not exceed the City's noise standards of 60  $L_{eq}$  dBA and 50  $L_{eq}$  dBA for daytime and nighttime hours, respectively. Nevertheless, due to uncertainties surrounding the timing and intensity of use of on-site equipment at the facility, these noise standards could be exceeded from Project operation as well as generate single event noise conditions that could create sleep disturbance for sensitive receptors in the area. Noise control measures are provided in Mitigation Measure 3.9-4 to reduce impacts to a less-than-significant level (see pages 3.9-19 through 3.9-22 of the Draft EIR), and include: limiting operating hours of facility operations; requirements for design and maintenance of the on-site equipment; use of growler-type backup warning systems for mobile plant area equipment, rather than conventional beeping systems; and further noise monitoring testing until noise levels can be shown to be in compliance with City standards. These mitigation measures would ensure that noise standards would not be exceeded and that noise levels at nighttime would not disturb sleep at nearby sensitive receptors. No changes to the document are necessary.
- I3-2 The comment addresses concerns related to vibration during operation of the Project. The potential for the Project to generate vibration levels that would cause annoyance or damage to residential structures is addressed under Impact 3.9-2 in the Draft EIR (pages 3.9-17-3.9-18). Table 3.9-1 of the Draft EIR presents the Federal Transit Administration guidelines for maximum-acceptable vibration criteria for different types of land uses, and indicates that residences and buildings where people normally sleep should not have a ground-borne vibration level in excess of 72 vibration decibels (VdB) for frequent events, 75 VdB for occasional events, and 80 VdB for infrequent events. As discussed under this Impact 3.9-2, a study (Draft EIR Appendix D) was prepared to address the potential for operational vibration determined that vibration levels above 60 VdB are not expected at locations beyond 100 feet from the operating equipment. Therefore, impacts related to operational vibration would be less than significant as concluded under Impact 3.9-2. No changes to the document are necessary.
- I3-3 The comment addresses concerns related to dust generated during operation of the Project. Section 3.2 of the Draft EIR, "Air Quality," addresses the air quality impacts, including particulate matter or dust, that would occur during construction and operation of the Project. As discussed under Impact 3.2-1 (page 3.2-12 through 3.2-14 of the Draft EIR) and 3.2-2 (page 3.2-14 through 3.2-17 of the Draft EIR), the Project would result in potentially significant impacts to air quality during construction and operation, respectively. Mitigation Measures 3.2-1 and 3.2-2, applicable to both Impact 3.2-1 and 3.2-2, would adjust SMAQMD's thresholds of significance for  $PM_{10}$  and  $PM_{2.5}$  to 80 and 82 lb/day, respectively. Mitigation Measure 3.2-1, which requires implementation of BMPs, would reduce construction-related  $PM_{10}$  and  $PM_{2.5}$  emissions by approximately 54 percent to 8 and 4 lb/day, respectively. Operational project emissions after implementation of Mitigation Measure 3.2-2 would be lower than pre-mitigation emission levels of 50 lb/day of  $PM_{10}$  and 15 lb/day of  $PM_{2.5}$ , which are below SMAQMD's operational emissions thresholds of significance of 80  $PM_{10}$  and 82 lb/day  $PM_{2.5}$  (SMAQMD's thresholds when BMPs and BACTs are applied). These levels of emissions are below SMAQMD's operational emissions thresholds of significance (80  $PM_{10}$  and 82 lb/day  $PM_{2.5}$ ) used following implementation of BMPs and BACT. Therefore, this impact would be less than significant with mitigation. No changes to the document are necessary.
- I3-4 The comment states that homes values in the area would decrease due to increased noise, odors, and dust associated with the Project. See response to comment I3-1 regarding noise impacts of the Project and response to comment I3-3 regarding dust emissions from the Project.
- Impact 3.2-5 addresses potential odor emissions related to the Project, and concludes that because the Project would include operational Project design features that are considered the BACT by SMAQMD,

potential odor impacts would be reduced to a less than significant level (see page 3.2-20 of the Draft EIR). Furthermore, as discussed on page 3.2-20 of the Draft EIR:

Project features considered to be BACT by SMAQMD are related to the hot-mix asphalt facility. Each asphalt tank would use a vent condenser to capture emissions generated when air is displaced as the tank is filled. Additionally, since the vent condensers are integral to the tanks, they would also capture emissions when the tanks experience any standing losses. Emissions released during asphalt plant silo filling and loadout also would be controlled by a Blue Smoke Control device. The blend of particulate and vapors would be controlled through the silo filling and loadout duct work, which would vent into the Blue Smoke Control device.

To consider the potential for odor complaints from the Project operations, it is notable that the Project site is located directly north of the existing Paramount Petroleum Asphalt Plant. Any odor complaints associated with this asphalt plant would be compiled by SMAQMD. However, SMAQMD has received no complaints from nearby residents regarding odors generated at the plant (Muller, pers comm., 2022); thus, it is reasonable to assume that objectional odors are not occurring from the existing Paramount Petroleum Asphalt Plant. Because the Project would produce similar odors to the Paramount Petroleum Asphalt Plant, it is reasonable to assume that complaints from nearby receptors would not be registered for the Project during operation.

Issues pertaining to home values are economic and social effects. CEQA Guidelines Section 15131 states that economic and social effects of a project should not be treated as significant environmental effects, unless there is a physical change to the environment related to anticipated economic or social changes associated with the project. A potential physical change to the environment associated with a potential for decreased home values has not been established; thus, no changes to the EIR are necessary.

No changes to the document are necessary.

- I3-5 The comment suggests that a different location would be more appropriate for the Project. State CEQA Guidelines Section 15126.6(c) states that a project alternative must meet most of the basic project objectives and avoid or substantially lessen one or more of the significant effects. As discussed throughout Chapter 3 of the EIR, there are no significant environmental effects identified for the Project, including for noise (see response to comment I3-1, above). Chapter 4 of the Draft EIR, "Alternatives," contains an evaluation of alternatives to the Project, including an alternate Project site (see Section 4.3.1 of the Draft EIR, "Alternate Project Site Location"). However, because no significant environmental impacts would be eliminated or reduced, an alternate Project site was not considered in detail in the alternatives analysis. No changes to the document are necessary.
- I3-6 The comment requests information related to the public review process. The City will hold a public hearing before the Planning Commission to consider certification of the EIR and approval of the Project. The City will send a notice of this hearing to the commenter.



## 3 REVISIONS TO THE DRAFT EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strike through~~, and text additions are shown in underline.

The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

### 3.1 REVISIONS TO THE LIST OF ACRONYMS

In response to comment A1-1, the text on page vii has been modified as follows.

~~SacSewer~~SASD

Sacramento Area Sewer District's

### 3.2 REVISIONS TO THE PROJECT DESCRIPTION

In response to comment A1-2, the text in the third paragraph on page 2-6 has been modified as follows.

#### WASTEWATER

The Sacramento Area Sewer District would serve the Project site. Wastewater would be limited to that produced by the employees on-site. The Project would include installation of an approximately 120-foot long 8-inch collector across the property frontage on Waterman Road ~~a minimum 6-inch lateral~~ that would connect to SASD's ~~trunk sewer line~~ manhole located in Waterman Road.

In response to comment A2-2, the text in fourth paragraph on page 2-7 the has been modified as follows.

#### ELECTRICAL AND NATURAL GAS SERVICE

The Sacramento Municipal Utility District (SMUD) would provide electricity to the Project site from the existing 12-kilovolt facilities located at the northwestern corner of the site. Electrical service would be provided by SMUD, and the Project would be enrolled in SMUD's Greenergy program to ensure that 50 percent of the power used on-site is provided from renewable energy supplies. In addition, the Project would meet California Green Building Standards Code Tier 1 standards for nonresidential development.

The Pacific Gas and Electric Company would supply natural gas to the site.

During construction, the applicant would be responsible for maintaining all California Division of Occupational Health and Safety and California Public Utilities Commission safety clearance requirements related to overhead and underground facilities ~~would be maintained~~. The applicant would coordinate the need for easements, siting requirements, clearance requirements for utilities, and load requirements for the project prior to SMUD providing electrical provisions to the Project.

In response to comment A3-1, the text on page 2-9 has been modified as shown below. A modification was also made on this page to list the correct the listed water agency responsible for approval of water supply distribution facility improvements for the project.

### 3.1 PROJECT-RELATED APPROVALS, AGREEMENTS, AND PERMITS

The Sacramento County Environmental Management Department (EMD) is the Local Enforcement Agency (LEA) for the California Department of Resources, Recycling, and Recovery (CalRecycle). The LEA enforces Title 14 and 27 of California Code of Regulations (CCR) governing solid waste disposal and solid waste facilities in Sacramento County. This includes facilities that handle construction and demolition debris and inert debris. EMD as the LEA may issue a permit if the facility meets certain requirements and would inspect the facility to verify that it is and has been operating in a manner that meets the requirements of Title 14 Division 7 Section 17381.1 of the California Code of Regulations.

As the lead agency under CEQA, the City of Elk Grove is responsible for considering the adequacy of this EIR and determining whether the Project should be approved and issued a Conditional Use Permit.

- ▶ The following discretionary actions and permits are anticipated for the proposed Project.
- ▶ Central Valley Regional Water Quality Control Board: Waste Discharge Requirements
- ▶ Sacramento Metropolitan Air Quality Management District: Clean Air Act compliance
- ▶ City approval of Design Review
- ▶ City approval of a Conditional Use Permit
- ▶ City approval of a Tree Removal Permit
- ▶ ~~Sacramento County Water Agency-Elk Grove Water District~~: approval of water supply distribution facility improvements
- ▶ Sacramento Area Sewer District: approval of wastewater conveyance facility improvements
- ▶ Sacramento Municipal Utility District: approval of electrical conveyance facility improvements
- ▶ Sacramento Metropolitan Air Quality Management District: approval of an Authority to Construct and Permit to Operate
- ▶ Sacramento County Environmental Management Department solid waste/recycling permit.

### 3.2 REVISIONS TO SECTION 3.3. BIOLOGICAL RESOURCES

To provide clarification, the text in the fourth bullet on page 3.3-24 has been modified to provide greater clarity to the description of Chapter 16.130 of the City of Elk Grove Municipal Code, as discussed in the text of Mitigation Measure 3.3-2a:

- ▶ Approximately 16.7 acres of Swainson's hawk foraging habitat (i.e., ruderal herbaceous, seasonal wetland) would be affected by project implementation. Mitigation for loss of Swainson's hawk foraging habitat will follow Chapter 16.130 of the City of Elk Grove Municipal Code, which requires mitigation for the loss of Swainson's hawk habitat at a 1:1 ratio, which may be achieved through the dedication of a conservation easement or through purchase of City-owned credits for projects of 40-acres or less. ~~projects that would impact less than 40 acres of habitat to mitigate loss of Swainson's hawk foraging habitat by paying a mitigation fee.~~

### 3.3 REVISIONS TO SECTION 3.9, NOISE

Section 6.32.080 of the Elk Grove Municipal Code contains exterior noise standards for sensitive receptors, outlined in Table 6.32-1 (presented as Table 3.9-5 in the Draft EIR). In the case that the measured ambient noise level exceeds the noise levels identified in Table 6.32-1 (presented as Table 3.9-5 in the Draft EIR), a maximum increase of 5-dBA is allowed where the ambient noise level is above that shown in the table but less than 60 dB. Because the measured

ambient noise conditions exceed the City's standards, adjusted thresholds were used in the Draft EIR to evaluate operational noise impacts (Impact 3.9-4). However, ambient noise measurements were taken during the day (approximately 10 am to 3:45pm), and it is not clear if nighttime noise standards may be adjusted without nighttime ambient noise measurements. Regardless, as noted above, the project would not exceed pre-adjusted noise standard levels; thus, impacts would be less-than-significant under adjusted and non-adjusted noise standard conditions. To provide greater clarity and to provide more protective standards, the text in the last paragraph on page 3.9-19 was revised as follows:

---

Operation of the Project would involve the operation of an asphalt and ready-mix plant and a recycling facility, as well as movement of on-site vehicles associated with the sale of future aggregate products. Predicted daytime and nighttime noise levels from the operation of the noise sources would not exceed the pre-adjusted City's noise standards of 55 ~~60~~  $L_{eq}$  dBA and 45 ~~50~~  $L_{eq}$  dBA for daytime and nighttime hours, respectively. Nevertheless, due to uncertainties surrounding the timing and intensity of use of on-site equipment at the facility, these noise standards could be exceeded from Project operation as well as generate single event noise conditions that could create sleep disturbance for sensitive receptors in the area. Impacts would be **less than significant** with mitigation.

---

Because it is unclear whether it is appropriate to adjust nighttime noise standards solely based on daytime ambient noise levels, Mitigation Measure 3.9-4 has been modified to reflect pre-adjusted noise standards. This change to the mitigation measure would create a more stringent threshold in terms of how to consider the City's noise standard. It is important to note that implementation of Mitigation Measure 3.9-4 places requirements for on-site operations that would limit noise, including requirements for on-site equipment and limiting operation of the recycle facility and aggregate sales to daytime hours (i.e., 7 a.m. – 10 p.m.). Further, Mitigation Measure 3.9-4 requires that upon completion of project construction but prior to issuance of authority to operate, the onsite equipment and operations shall be subject to a sound level measurement by an acoustical professional to ensure that City daytime and nighttime noise standards, as well as the 65 dBA SEL interior level for sleep disturbance, are not exceeded at any nearby sensitive receptor. While predicted noise levels indicate that City noise standards would not be exceeded, these mitigation measures ensure that sleep disturbances at nearby receptors would be avoided. Thus, impacts would continue to be less-than-significant upon implementation of Mitigation Measure 3.9-4. Consistent with the discussion above regarding adjusted noise thresholds allowed by the City, the text of Mitigation Measure 3.9-4 (last bullet on page 3.9-21 of the Draft EIR) has been modified as follows to no longer include an adjustment to nighttime noise standards:

- ▶ Upon completion of project construction but prior to issuance of authority to operate, the onsite equipment and operations shall be subject to a sound level measurement by an acoustical professional to ensure that City daytime and nighttime noise standards, as well as the 65 dBA SEL interior level for sleep disturbance, are not exceeded at any nearby sensitive receptor. In the event that noise monitoring indicates that the Project noise generation would exceed either the City's daytime (i.e., 55 ~~60~~  $L_{eq}$ ) or nighttime (i.e., 50 ~~45~~  $L_{eq}$ ) noise standards or create noise levels at nighttime that could disturb sleep at nearby sensitive receptors, additional noise control measures shall be implemented until such compliance is achieved. Operation of the facility shall not be allowed until a noise operational analysis, submitted to the City for review and approval, can verify that noise standards are in compliance. If any identified noise standard is not being met, additional analysis of the noise monitoring results shall be conducted to determine the sources of noise responsible for any exceedances and noise control measures shall be targeted for those sources. The following noise control options have been successfully implemented at aggregate facilities and should be considered for this facility if needed and as feasible:

### 3.4 REVISIONS TO SECTION 3.12, UTILITIES

In response to comment A1-3, text in the fourth paragraph on page 3.12-2 has been modified as follows.

#### NPDES Permit for the Sacramento Regional Water Treatment Plant

The quality of the effluent that can be discharged to waterways in the Sacramento area by the Sacramento Regional Wastewater Treatment Plant (SRWTP) is established by the Central Valley RWQCB through waste discharge requirements (WDRs) that implement the NPDES permit. WDRs are updated at least every 5 years. A new permit must be issued in the event of a major change or expansion of the facility. In April ~~2021~~~~2016~~, the Central Valley RWQCB issued Order No. ~~R5-2016-0020~~~~R5-2021-0019-01~~, NPDES No. CA 0077682, to the Sacramento Regional County Sanitation District (Regional San) for its ~~Sacramento Regional Wastewater Treatment Plant~~ (SRWTP), which treats wastewater from its service area before discharging the treated effluent into the Sacramento River. The Central Valley RWQCB amended the NPDES Permit (R5-2021-0019-01) to include the production of recycled water by the EchoWater Project in accordance with the 2018 conditionally accepted Title 22 Engineering Report by the Division of Drinking Water. The water quality objectives established in the Central Valley RWQCB Basin Plan are protected, in part, by Order No. ~~R5-2016-0020~~~~R5-2021-0019-01~~, NPDES No. CA 0077682. Currently, the SRWTP is permitted for a discharge of up to 181 million gallons per day (mgd) of treated effluent into the Sacramento River.

In response to comment A1-4, the text in the third paragraph on page 3.12-2 has been modified as follows.

#### LOCAL

#### Sacramento Area Sewer District Standards and Specifications

The Sacramento Area Sewer District's (~~SASD~~~~SacSewer~~'s) Standards and Specifications establish minimum standards for the ~~SASD~~~~SacSewer~~ public sewer collection system. These standards apply to planning, design, construction, and rehabilitation of the public sewer collection system that ~~SASD~~~~SacSewer~~ operates and maintains. In addition the standards ensure that ~~SASD~~~~SacSewer~~ assets are consistently designed and constructed. The Standards and Specifications were approved by the ~~SASD~~~~SacSewer~~ Board of Directors on ~~March 13, 2019~~November 20, 2021.

In response to comment A1-6, the text in the second through fifth paragraph on page 3.12-7 has been modified as follows.

#### Sacramento Area Sewer District

SASD serves as one contributing agency to Regional San. It provides wastewater collection and conveyance services in the urbanized unincorporated area of Sacramento County; in the Cities of Citrus Heights, Elk Grove, and Rancho Cordova; and in ~~a portion~~ portions of the Cities of Sacramento and Folsom. SASD owns, operates, and maintains a network of ~~4,600~~ 4,700 miles of main line and lower lateral pipes (SASD ~~2022~~2023).

SASD trunk sewer pipes function as conveyance facilities to transport the collected wastewater flows to the Regional San interceptor system. The existing City trunk line extends southeast from the SRWTP influent diversion structure to Laguna Boulevard (i.e., the Laguna Interceptor and associated 54-inch truck line), then parallel to SR 99 along East Stockton Boulevard, extending close to the southern City boundary.

#### Sacramento Regional Wastewater Treatment Plant

The ~~SRWTP~~ Regional San SRWTP began operation in 1982 and, operated by Regional San, is located on 900 acres of a 3,550-acre site between Interstate 5 and Franklin Boulevard, north of Laguna Boulevard. The remaining 2,650 acres on the site serve as a "bufferland" between the SRWTP and nearby residential areas.

~~The SRWTP has 169 miles of pipeline.~~ Wastewater is treated by accelerated physical and natural biological processes before it is discharged to the Sacramento River (Regional San 2020).

In response to comment A1-7, the text in the first paragraph under Impact 3.1-1 on page 3.12-9 has been modified as follows:

As discussed in Section 2.5.8, "Utilities," water would be provided to the Project site by EGWD via a 16-inch water main that is planned for construction on the west side of the Union Pacific Railroad track and a 12-inch water main that would extend across the railroad track and parallel to the east side of the track for a total of 1,001 linear feet. The cost of the new water main would be split, between the applicant, developer to the north of the Project site, and the Elk Grove Water District. located in Waterman Road. In addition, wastewater pipelines would be connected to the local sewer system via a collector main line along the parcel frontage of Waterman Road. SMUD would provide electricity to the Project site from existing 12-kilovolt facilities located at the northwestern corner of the site, Pacific Gas and Electric Company would supply natural gas to the site, and stormwater from a small bioretention facility would be conveyed to the City's system along Waterman Road.

This page intentionally left blank.

## 4 REFERENCES

City of Elk Grove. Grant Line Construction Aggregate Production and Recycling Facility Project Draft Environmental Impact Report. Available: <https://www.elkgrovecity.org/planning/environmental-review>. Accessed March 2023.

Federal Interagency Committee on Aviation Noise. 1997 (June). *Effects of Aviation Noise on Awakenings from Sleep*.

This page intentionally left blank.



## 5 LIST OF PREPARERS

### LEAD AGENCY

#### City of Elk Grove (Lead Agency)

Kyra Killingsworth ..... Senior Planner  
Antonio Ablog ..... Planning Manager

#### Ascent Environmental, Inc. (CEQA Compliance)

Patrick Angell ..... Principal  
Marianne Lowenthal ..... Project Manager  
Jim Merk ..... Technical Review  
Marianne Lowenthal ..... Aesthetics, Utilities  
Jacklyn Bottomley ..... Environmental Planner  
Julia Wilson ..... Air Quality, Greenhouse Gas Emissions and Climate Change, and Noise  
Dimitri Antoniou ..... Senior Air Quality/GHG/Noise Specialist  
Hannah Weinberger ..... Biological Resources  
Tammie Beyerl ..... Senior Biologist  
Alta Cunningham ..... Archeological, Historical, and Tribal Cultural Resources  
Tristan Evert ..... Hazards and Hazardous Materials, Hydrology and Water Quality  
Jazmin Amini ..... Transportation/Traffic  
Zach Miller ..... Senior Transportation/Traffic  
Richa Nanavati ..... Land Use, Public Services  
Phi Ngo ..... GIS Specialist  
Michele Mattei ..... Publishing Specialist  
Gayety Lane ..... Publishing Specialist  
Brian Perry ..... Graphic Specialist

