

From: John Merchant
To: Jessica Brandt, Chris Pahule
Sacramento County Department of Planning & Environmental Review

Subject: Revised Application. Rancho Murieta Properties LLC, 3/20/2022

Thank you for meeting with Tom Hennig, Michael Fritschi and myself concerning PNL2014-00206 submitted by Rancho Murieta Properties LLC. Tom will follow up with a summary that will include our discussion concerning the commercial area that has been added to the plan. This letter summarizes my specific concerns that we discussed today.

Integrated Water Master Plan (IWMP)

A 2006 IWMP was the basis for the IWMP completed in 2010. This 2010 report lends data to the 2016 Water Supply Assessment (WSA) requested by the county. The age of this WSA makes it obsolete and new WSA should be included with revised application. These two new documents (IWMP & WSA) will adjust for new state requirements, climate change, lot line changes, emergency conservation measures, landscaping restrictions and new laws concerning accessory dwellings. A new and thorough assessment of the Rancho Murieta water supply is required before this application may proceed. I do not suggest that there is (or is not) enough water to support this development. However, until a new WSA is issued, no person or organization can make an accurate assessment of the water supply of Rancho Murieta.

Accessory Dwellings (AD)

New laws allow great flexibility in the conversion of existing (and new) houses into accessory dwellings. This is especially true in the amended application, where lots of 12,000 to 20,000 square feet are included in the lot plan. The impact on parking, internal traffic flow, external highway traffic, water use and water conservation are currently "unknowns" in the planning process. We would appreciate that County Planning confirm the RMA/CSD authority for assessing the "planning number" of these

accessory dwellings. The “assumptions” of the AD count must not be left to a developer with whom a significant bias and obvious financial incentive exist.

The Calero Reserve

This welcome addition of open space does not mitigate an overall problem around the reservoirs of the CSD. It must be decided if this reserve will be maintained by Rancho Murieta Properties. The responsibility for fire safety (brush clearance etc.) should remain with the developer/owner.

It is historical practice for developers to deed undeveloped property to the RMA. If easements are created that incentivize RMA to accept this reserve, they must be agreed upon PRIOR to the acceptance and creation of the reserve. A negotiated settlement of ownership and responsibility of this reserve property must precede the issuance of the NOP.

It is critical that fire protection be both planned and executed in the areas surrounding our drinking water reservoirs. Responsibility for the Calero Reserve must be clearly defined.

Tree Mitigation

There are 19,504 trees in the outdated Rancho Murieta Tree Inventory and Canopy Survey completed in January 2015. This tree inventory must be retaken prior to the creation of a draft EIR. There are approximately 5,000 trees that will remain inside the Calero Reserve. However, there also trees throughout the development that now exceed the “inch level” and “canopy” recorded in the eight year old study. The proposed Calero Reserve must not be considered tree mitigation for Villages A to H. It is historically a county policy to disallow tree mitigation using EXISTING TREES. A formal count of trees to be removed in all villages must also be made available BEFORE the project moves into the drafting of an EIR. The community has a long and disappointing history with tree mitigation, especially with the Rancho Murieta South developers. A complete understanding (and resubmission) of the tree inventory is critical to the preservation of the natural landscape of this community. This mitigation is

of a size that it will be one of the largest tree removals proposed to Sacramento County.

The issue is important to both CSD and RMA. The removal of excessive amounts of trees and terracing above our reservoirs will occur in areas of significant drainage. Erosion and the deposit of sediment and dirt into our drinking water lakes must be completely mitigated. An updated tree and canopy inventory will provide data to completely assess the total impact on this highly sensitive area.

Village F

Village F lies significantly below the level of Lake Chesbro. There is a perpetual noise in this area from the Rancho Murieta Water Plant. A disclosure must be in place to insure buyers are aware the plant noise and the 24 hour per day operation. There is also a critical drainage issue that begins on the Sacramento Nature Conservancy and ends at Lake Clementia. Again, I stress that completed, RMCS D water, sewer and drainage studies must be in place before this process moves to the writing of a draft EIR.

Fire and Emergency Evacuation

Village D, E, F and G contain a two lane road that connects them to a point of ingress and egress. There is NO alternate escape route from these villages in case of fire or other emergency. Access across the earthen dam at Lake Clementia should be prohibited. Again, without a water engineering study, it is impossible to measure the flow rate and pressure of the water supply in these "outback" regions of the development. How can we be sure significant water pressure and infrastructure construction exist that would make these developments feasible? Will a gravity feed water tank be necessary to service this large expanse of property? Where can it be located? Again, there is no technical study to support the feasibility of the project. Please do not ask us to evaluate the project without complete technical information.

Parks

The application does not offer the addition of a single athletic field. The new development does not provide for a park in which the community can support its flourishing Little League, Lacrosse and Soccer programs. The Stonehouse Park is already overburdened and the addition of 697 lots could add a population of 500 "non adults" (using the 2020 census as a benchmark). This number of "non adults" is EXCLUSIVE of the 523 lots that are currently in development or hold approved maps. The lack of space for organized recreation is obvious. The developer must relinquish land to provide space for additional athletic recreation. CSD has concerns for traffic and safety if additional demand on the Stonehouse Park are created by increased development. There is also concern for the traffic and safety issues on three key streets that are used by residential traffic to access the park. These streets are discussed in the later in the memo.

Cattle and Residential Development

Great concern was expressed in the 2016 stakeholder meetings concerning the collision of cattle and a residential fence line. Three ranches abut this development. The development borders the Sacramento Nature Conservancy. The Conservancy leases grazing land which are a principal part of Conservancy revenue. The Conservancy must be consulted about this project. Mr. Van Vleck must also be consulted as his concerns are well voiced in the minutes of those 2016 meetings. Vast portions of the Rancho Murieta Properties development border this grazing area. The application does not offer ANY concern or mitigation for this agricultural interest. Residential lots should not border grazing land and be separated by a common fence. This issue touches on the concern for ingress and egress for Villages D, E, F & G. The issues of emergency evacuation from these areas are discussed below.

Drainage

A new drainage model, using the new County software tools, must be prepared and evaluated in the Draft EIR. This modeling must take place BEFORE the application proceeds to the writing of the draft EIR. The first drainage study submitted by the developer was categorically rejected by the the RMCS D. This plan however, remains part of the initial development package. Comments from CSD about this drainage study are not present Comments were submitted.

Consideration should be given to a 200 year flood plain when assessing the impact around the three drinking water reservoirs. All three reservoirs, which represent a total, finite storage of community water, are impacted by the proposed development. THERE CANNOT BE A MISTAKE! Rancho Murieta does not have the immediate ability to replace raw water that is contaminated or corrupted by surrounding development. Unlike almost all other water districts in the county, Rancho Murieta cannot draw from a well or into Folsom Lake to replenish its water supply. A mistake will significantly damage the value of our homes. The developer must demonstrate the viability and safety of the drainage plan BEFORE the project proceeds. Again, water, sewer and drainage studies must be in place that guarantee a safe water supply for a community that may grow to nearly 9000 people.

Reference is made to a record downpour of rain on February 7, 2015. This storm delivered rainfall at a rate of two inches per hour. Reference is also made to Lake Clementia, which in early 2022 reached a near record low. Five days of rain returned this reservoir to a level in which water was cascading over the spill way. Again (and again), we stress that drainage is a monumental issue beside and above Rancho Murieta's three reservoirs. This project cannot be evaluated without completed drainage studies for all eight villages. There is also a question of displaced, natural drainage in Lake Clementia. Currently, natural drainage replenishes the water supply as water drains from the high ground on the east side of the lake. When development converts this water to urban storm water, a valuable source of water replenishment will be eliminated. This loss of water must be accounted for in the Integrated Water Master Plan and the Water Supply Assessment. At present, it is not

Outreach

The county is well aware of the deficiencies of the public outreach conducted by this developer in conjunction with their original NOP. The residents of Rancho Murieta must be given the opportunity to gather in public meetings and publicly express their concerns. The attempt to control the dialog in small meetings with limited access is unacceptable. The developer must be asked to submit a plan for public outreach that meets these standards. There must be a clear understanding of the CPAC process as well as local public outreach. Under the new CPAC guidelines, what will be the "one meeting rule" and will the CPAC be asked to forward a recommendation after a single meeting? There have been no major projects in the South County since the new guidelines for CPAC were established. Will the developer be asked to conduct public outreach and a CPAC presentation for all 8 villages in one meeting? Please clarify the procedure in your response to the developer.

It has also been suggested that a NEW series of stakeholder meetings be conducted prior to issuance of an NOP. These need not be as lengthy as 2016. Two meetings would be adequate for all stakeholders to address concerns that may differ from those expressed in 2016. CSD, RMA, The Sacramento Conservancy and the neighboring ranchers would be key participants.

It is important that CSD share in these meetings and have the ability to listen to its ratepayers.

Scoping

A widely publicized public scoping must be conducted in Rancho Murieta (not 25 miles away from the area to be developed). The meeting must be timed to include working residents with families. Rancho Murieta's demographics have changed since the initial discussions of 2003.-2005.

Trails

Two trail plans are on file at county planning. One belongs to the developer and one belongs to the RMA. Despite a rosy dialog in the application, there is no agreement on trails. A review of the trail system must be completed and the conflicting issues must be resolved prior to the creation of an EIR. This is the responsibility of the RMA. While the input quoted in the application references trail input from the Murieta Trail Stewards, final approval authority should rest with the Rancho Murieta Association. Access and patrol by CSD Security are key issues that remain open. We cannot review these plans without the establishment of a "trail plan of record".

Traffic

The TJKM report provided by the developer does not correspond to Phase one and Phase two report presented on this application and must be resubmitted.. In addition, Caltrans has provided information that is outdated (2015) and must be reworked. Caltrans should be asked to collaborate with County DOT to evaluate the impacts of a completed shopping center which will include a Tractor Supply, a Taco Bell and a Circle K gas station/car wash. When added to the traffic created by a fully functional hotel, a fully functional Bel Air Market and related shops, the intersection will require additional lanes and turn lanes to remain functional and safe. Caltrans should be asked to evaluate the LOS (level of service) to insure that it will continue to meet Caltrans guidelines. As many as 4000 residential cars will, at buildout, be added to the current community auto inventory. The community also receives traffic from guests, delivery and the Rancho Murieta County Club. The problem is compounded by the significant number of equestrian events at the Murieta Equestrian Center. Because of the safety issues at Lone Pine Drive, significant traffic is created by trucks and horse trailers that exit the events via the existing signaled intersection. It is imperative that a signal be added at Lone Pine Drive to relieve the safety concerns created by the left turn from Stonehouse Drive to State HWY16. Realignment of Stonehouse Road MUST occur in tandem with the implementation of this traffic signal. Sacramento County DOT is aware of this unsafe condition and should be asked to comment and recommend a mitigation schedule.

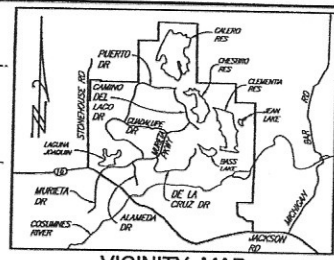
Sacramento County DOT has indicated that a third Rancho Murieta gate (the Esquela Gate) cannot be added prior to the installation of a signal at Lone Pine Drive. Input from a technical traffic study must focus on both the need and implementation of a third gate and the installation "trigger" for the Lone Pine Drive traffic signal.

The increase in internal traffic on Pera Drive, Upper Guadalupe Drive and Puerto Drive will create significant impacts to the quality of life for residents who now reside on these streets. A complete internal traffic analysis must be included in an updated technical study.

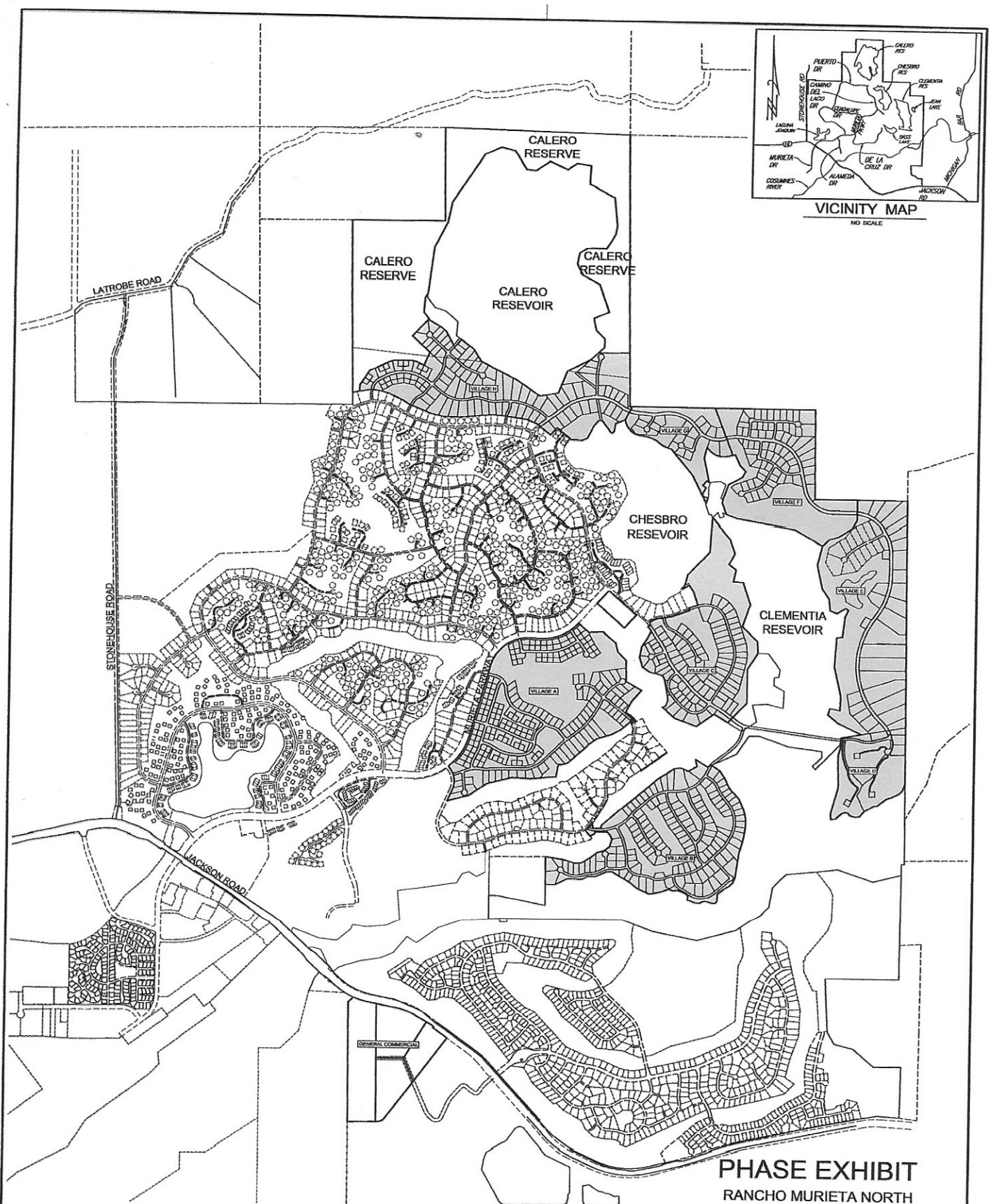
Eagles

Rancho Murieta has consistently been the home of a pair of American Bald Eagles. These Eagles consistently live at the same location and when necessary, have rebuilt nests in the exact same location. The current mapping of Village E contains proposed lots that interfere with the nesting pattern of these birds. While the developer promises to leave these lots dormant while Eagles are present, this is inconsistent with the permanent nesting patterns of these birds. It is recommended that these lots be permanently dedicated as wildlife habitat. When combined with sensitive habitat for nesting water birds and the presence of cattle at the property lines of each residential dwelling, Village E remains extremely problematic. Fish and Game should be asked to comment on this specific area in its technical study. The EIR should not proceed until this is completed. The removal or retention of these lots will impact the water, sewer and drainage studies required in this area.

Thank you for allowing me to comment. You may reach me at merchant30@gmail.com or at 916-761-2765

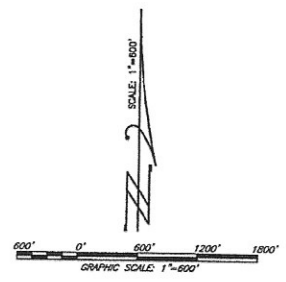


VICINITY MAP
NO SCALE



LEGEND

- PHASE 1 = VILLAGES A, B, C, H
- PHASE 2 = VILLAGES D, E, F, G
- GENERAL COMMERCIAL AREA



PHASE EXHIBIT
RANCHO MURIETA NORTH
 APN's 073-0090-062, 073-0180-029,
 073-0790-023,
 073-0800-003, 007, 008, & 009
 SACRAMENTO COUNTY, CALIFORNIA
 DECEMBER, 2021

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FIGURE 4

110803-PMSE-EXHIBIT