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## APPENDIX B

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Law Offices of  
GEORGE E. PHILLIPS

2306 Garfield Avenue  
Carmichael, California 95608  
Telephone (916) 979-4800  
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January 3, 2001

VIA FACSIMILE AND U.S. MAIL

Chris Stabenfeldt  
Pacific Municipal Consultants  
140 Independence Circle, Suite C  
Chico, CA 95973

Re: Stock Ranch Guide to Development  
Technical Corrections to Draft EIR

Dear Chris,

As I mentioned on Tuesday morning, we have some technical corrections to make to the Stock Ranch Guide to Development Draft Environmental Impact Report (EIR). These corrections relate to the Biological Resources section (Section 4.9) of the Draft EIR and are set forth below.

Some of our comments relate to species surveys already conducted to satisfy mitigation measures contained in the Draft EIR. If it enhances the EIR discussion to include reference to the studies that have been completed, please do so. Otherwise, we will plan to submit these surveys later to the City to comply with the mitigation measure(s).

1. Page 4.9-19, fifth paragraph

The fifth paragraph lists the acreage associated with each of the wetland types. These acreages are incorrect. Please see the attached letter from Jim Gibson to Mike Finan of the Corps of Engineers dated May 9, 2000 (and submitted to the City in August 2000). Please update the acreages for each wetland type.

2. Page 4.9-19, fifth paragraph

The fifth paragraph indicates that the wetland delineation was prepared by Gibson & Skordal but has not been verified by the Corps. The delineation was verified by the Corps on August 8, 2000. Enclosed is a letter from the Corps of Engineers regarding the verification.

3. Page 4.9-28, Mitigation Measure 4.9.4a

This mitigation measure requires that a special status plant survey be prepared. A special status species survey was conducted in Spring 2000. Attached is a letter report from Miriam Green Associates dated June 15, 2000.

4. Page 4.9-32, Mitigation Measure 4.9.10a

This mitigation measure requires wet season protocol surveys for listed vernal pool invertebrates. These surveys were conducted by Gibson & Skordal in 1995 and 1996 and no listed invertebrates were found. Reports were filed with U.S. Fish & Wildlife Service.

5. Page 4.9-33, Mitigation Measure 4.9.11a

This mitigation measure requires an elderberry survey. Gibson & Skordal conducted elderberry surveys in Spring 2000 and no elderberries were identified in the specified areas of development.

6. Page 4.9-34, Impact 4.9.12, Jurisdictional Waters of the US

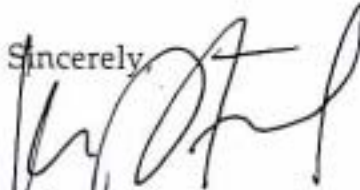
The impact statement indicates that there are 1.85 acres of jurisdictional waters of the U.S. There are 3.52 acres of jurisdictional waters, including vernal pools, three tributaries and the Arcade Creek and San Juan Creek channels. The figure of 1.85 does not include Arcade and San Juan Creeks.

7. Page 4.9-34, Mitigation Measure 4.9.12a

Mitigation measures for impacts to jurisdictional waters should include the option of purchasing wetland credits at a Corps of Engineers approved mitigation bank.

We appreciate the opportunity to make these corrections for the Final EIR. Please contact us if we can provide additional information or clarification of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris Steward". The signature is stylized and cursive, written over the word "Sincerely,".

Kris Steward

Enclosures

cc: Colleen McDuffee



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO  
CORPS OF ENGINEERS  
1325 J STREET  
SACRAMENTO, CALIFORNIA 95814-2922  
August 8, 2000

Regulatory Branch (200000412)

James Gibson  
Gibson & Skordal  
2277 Fair Oaks Blvd., Suite 395  
Sacramento, California 95825-5500

Dear Mr. Gibson:

This letter concerns the delineation of waters of the United States, including wetlands, you have provided on behalf of California C&S Properties, for the Stock Ranch property. This property is located in Sections 25 and 36, Township 10 North, Range 6 East, Sacramento County, California.

I have reviewed and verified the **May 2000, Jurisdictional Delineation, Stock Ranch** drawing showing 3.67 acres of waters of the United States, including wetlands, within the surveyed area. Our jurisdiction in this area is under Section 404 of the Clean Water Act based on the definition of waters of the United States, as defined in 33 CFR 328. A Department of the Army permit is required prior to discharging dredged or fill materials into waters of the United States. Accordingly, a permit will be required prior to filling any of the waters present on the property. The type of permit required will depend on the type and amount of waters which would be lost or adversely modified by fill activities.

This verification is valid for five years from the date of this letter unless new information warrants revision of the determination before the expiration date. Please refer to identification number 200000412 in any correspondence concerning this project. If you have any questions, write to Mr. Justin Cutler, Room 1480 at the letterhead address, or telephone (916) 557-5258.

Sincerely,



Justin Cutler

Project Manager, Delta Office

Enclosures

Copies Furnished (w/o enclosures)

California C&S Properties, 1939 Harrison Street, Oakland, California 94612-3529



**GIBSON & SKORDAL**  
*Wetland Consultants*

2277 Fair Oaks Blvd., Suite 395  
Sacramento, California 95825

(916) 569-1830 Fax: (916) 569-1835

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May 9, 2000

Mr. Mike Finan  
Corps of Engineers  
Regulatory Branch  
1325 J Street  
Sacramento, California 95814

**Subject: Re-Verification of Jurisdictional Delineation – Stock Ranch, Citrus Heights, California (199200528)**

Dear Mr. Finan:

We are requesting that you re-verify the Stock Ranch jurisdictional delineation, originally verified in August 1992 and re-verified in March 1995.

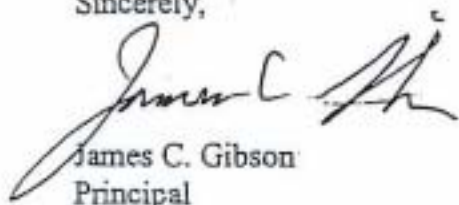
We have made minor revisions on the attached delineation map based on field surveys conducted on April 27<sup>th</sup>. Total jurisdictional waters were increased from 3.08 acres to 3.67 acres as indicated in the attached table. The primary changes were based on the following.

1. The lengths of Arcade and San Juan Creeks were expanded due to adjustments to the alignment of the creeks and the eastern study area boundary.
2. The wetland swales in Tributary Drainage 3 were expanded due to increased commercial and residential runoff.
3. Firebreaks, off-road vehicle use, and other disturbances resulted in changes in configuration of several wetlands.
4. Areas of wetlands were more accurately calculated.
5. The seasonal wetlands nomenclature was changed to vernal pools to better reflect their vegetative composition.

Mr. Mike Finan  
May 9, 2000  
Page 2

Please re-verify our delineation as revised on the attached map. If you have any questions or need additional information, please contact me at (916) 569-1830.

Sincerely,

A handwritten signature in black ink, appearing to read "James C. Gibson". The signature is fluid and cursive, with a large initial "J" and "G".

James C. Gibson  
Principal

JCG:bjs  
Attachment

cc: Mr. John Stock  
Saylor & Hill  
1939 Harrison Street  
Oakland, California 94612  
w/Attachment

Mr. George Phillips  
2306 Garfield Avenue  
Carmichael, California 95608  
w/Attachment

Mr. John Pitalo  
Morton & Pitalo, Inc.  
1788 Tribute Road, Suite 200  
Sacramento, California 95815  
w/Attachment

**STOCK RANCH  
WATERS OF THE UNITED STATES**

**TRIBUTARY DRAINAGE 1**

Channel

Area (sq.ft.)  
8,300

**TRIBUTARY DRAINAGE 2**

Channel

Area (sq.ft.)  
17,920

**TRIBUTARY DRAINAGE 3**

Channel

Area (sq.ft.)  
4,610

Wetland Swale 1

6,200

Wetland Swale 2

18,445

Wetland Swale 3

650

Wetland Swale 4

4,080

Subtotal

33,985 sq.ft.

**ARCADE CREEK**

Channel

Area (sq.ft.)  
60,600

**SAN JUAN CREEK**

Channel

Area (sq.ft.)  
10,500

**VERNAL POOLS**

		<u>Area (sq.ft.)</u>			<u>Area (sq.ft.)</u>
VP-1	/	2,320	VP-7		2,015
VP-2		360	VP-8		1,955
VP-3		375	VP-9		1,555
VP-4		11,050	VP-10		475
VP-5		5,580	VP-11		1,650
VP-6		700	VP-12		400
			VP-13		250

Subtotal

28,680 sq.ft.

**TOTAL = 159,985 Sq.Ft.  
or 3.67 Acres**





## MIRIAM GREEN ASSOCIATES

June 15, 2000

Mr. Jim Gibson, Principal  
Gibson & Skordal Wetland Consultants  
2277 Fair Oaks Boulevard, Suite 395  
Sacramento, CA 95825

RE: Stock Ranch - Special-Status Plant Surveys

Dear Jim:

This letter reports the results of field surveys conducted for special-status plant species in the vernal pools on that portion of the Stock Ranch property north of Arcade Creek. The project site consists of approximately 50 acres and is located on Auburn Boulevard west of Sylvan Way in Citrus Heights, California (USGS Citrus Heights 7.5-minute topographic quadrangle [T10N, R6E, Section 26]). Thirteen (13) vernal pools exist on this portion of the property according to a wetland delineation prepared by *Gibson & Skordal* (2000). Earlier biological assessments prepared by *ECORP Consulting* (December 7, 1999 and January 11, 2000) recommended spring surveys be conducted to determine the presence of special-status plant species. Target plants are identified in Table 1.

Field surveys were conducted on April 28, May 1, and June 2, 2000. All vernal pools were surveyed during the April and May, 2000 surveys. At that time, the pools were moderately to completely dry and contained some vernal pool obligates with varying degrees of invasive plants. No special-status plants were found during these spring surveys.

A follow-up survey was conducted on June 2, 2000 to determine whether any of the orcutt grasses were present in the deeper pools on the project site. Orcutt grasses cannot be detected during early spring surveys. No orcutt grasses were found during the June survey.

The Stock Ranch property has been heavily impacted by pedestrian and bicycle traffic. Many of the vernal pools contain refuse, such as tires, clothing, etc. This property also appears to have served as a dumping ground for dirt and other debris, which may explain the occurrence of invasive plants in the vernal pools and surrounding upland areas.

Please call me if you have any questions.

Sincerely,

Miriam Green

attachments

**Table 1. Special-Status Plants that may Occur in the Citrus Heights Area (compiled from Skinner and Pavlik 1994; NDDB 2000a,b)**

Common Name <i>Scientific Name</i>	Legal Status <sup>1</sup> State/Federal/CNPS	Habitat / Flowering Period
Dwarf downingia <i>Downingia pusilla</i>	-- / -- / 2	vernal pools / March to May
Bogg's Lake hedge-hyssop <i>Gratiola heterosepala</i>	E / -- / 1B	vernal pools / April to June
Legenere <i>Legenere limosa</i>	-- / SC / 1B	vernal pools / May to June
Sanford's arrowhead <i>Sagittaria sanfordii</i>	-- / -- / 2	sluggish sloughs and freshwater marshes; pond margins / May to July
Sacramento orcutt grass <i>Orcuttia viscida</i>	E / E / 1B	vernal pools / May to June
Slender orcutt grass <i>Orcuttia tenuis</i>	E / T / 1B	vernal pools / May to July
Stinkbells <i>Fritillaria agrestis</i>	-- / -- / 4	grasslands, clay soils / March to April

<sup>1</sup>Legal Status Codes

**State:** E = Listed as endangered under the California Endangered Species Act  
 -- = No designation

**Federal:** E = Listed as endangered under the federal Endangered Species Act  
 T = Listed as threatened under the federal Endangered Species Act  
 SC = Species of Concern (formerly Category 2 candidate species)  
 -- = No designation

**CNPS (California Native Plant Society):**

List 1B = Plants rare, threatened, or endangered in California and elsewhere  
 List 2 = Plants rare, threatened, or endangered in California, but more common elsewhere  
 List 4 = Plants of limited distribution - a watch list

## References

- Department of Fish and Game, Natural Diversity Data Base. 2000a. Special plants list. Biannual publication, mimeo. January, 2000.
- Department of Fish and Game, Natural Diversity Data Base. 2000b. State and federally listed endangered and threatened plants of California. January, 2000.
- ECORP Consulting. 1999 and 2000. Biological resources assessment and permitting issues of the Stock Ranch. Letter to Steven Hulbert.
- Gibson & Skordal. May 2000. Reverification of jurisdictional delineation of the Stock Ranch, Citrus Heights, California.
- Skinner, M.W. and B.M. Pavlik. 1994. California Native Plant Society's inventory of rare and endangered vascular plants of California. California Native Plant Society, Sacramento, California.