

APPENDIX L

404(b)(1) On-Site Alternatives Analysis

Section 404(b)(1) On-Site Alternatives Information

For

Folsom Plan Area Specific Plan Project

City of Folsom, California

Superseded Date:
3 May 2010

Original Date:
July 1, 2009

Prepared For:
City of Folsom
Folsom Area South Group



ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

CONTENTS

Section 404(b)(1) On-Site Alternative Information

Folsom Plan Area Specific Plan

INTRODUCTION 1

PROJECT PROPONENT(S) 1

PROJECT LOCATION 2

PROJECT DESCRIPTION 3

 Residential..... 4

 Single Family Residential (SF) 4

 Single Family High Density (SFHD) 4

 Multi-Family Low Density (MLD) 5

 Multi-Family Medium Density (MMD)..... 5

 Multi-Family High Density (MHD)..... 5

 Non-Residential..... 6

 Mixed Use (MU) 6

 Industrial/Office Park (IND/OP)..... 6

 Community Commercial (CC) 6

 General Commercial (GC) 6

 Regional Commercial (RC) 6

 Public Uses 7

 Parks (P)..... 7

 Public/Quasi-Public (PQP) 7

 Open Space (OS) 7

ENVIRONMENTAL SETTING 9

 Current Conditions 9

 Adjacent Land Uses 9

 Vegetative Communities 9

 Soils..... 10

 Hydrology..... 10

 Wetlands / Waters of the U.S. 10

 Wetlands..... 11

| | |
|---|-----------|
| Vernal Pools..... | 11 |
| Seasonal Wetlands | 12 |
| Seasonal Wetland Swales..... | 12 |
| Seep..... | 13 |
| Marsh..... | 13 |
| Creek/Channel | 13 |
| Intermittent Drainage | 14 |
| Ditch | 14 |
| Ponds..... | 14 |
| Willow Scrub | 15 |
| REGULATORY BACKGROUND..... | 15 |
| Clean Water Act, Section 404 Application | 15 |
| Purpose of Alternative Information | 16 |
| ALTERNATIVES..... | 18 |
| ALTERNATIVE INFORMATION | 18 |
| Alternative 1 – No Federal Action..... | 18 |
| Alternative 2 – Centralized Development..... | 19 |
| Alternative 3 – Resource Impact Minimization..... | 19 |
| Alternative 4 – Reduced Hillside Development..... | 19 |
| Alternative 5 – Proposed Project..... | 19 |
| Alternative 5a – Proposed Project with Additional Avoidance Areas..... | 20 |
| Alternative 5b – Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50..... | 20 |
| Alternative 5c – Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road | 20 |
| Alternative 5d – Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch..... | 21 |
| Alternatives Information | 21 |
| Factors Affecting Practicability..... | 22 |
| Project Purpose | 22 |
| Logistics | 23 |
| Costs Impact Information..... | 23 |

| | |
|--|----|
| Other Factors | 23 |
| Environmental Impacts | 23 |
| Alternative 1 – No Federal Action..... | 24 |
| Overview..... | 24 |
| Project Purpose | 24 |
| Logistics..... | 25 |
| Costs Impact Analysis | 26 |
| Other Factors | 27 |
| Environmental Impacts..... | 27 |
| Summary | 28 |
| Alternative 2 – Centralized Development | 29 |
| Overview..... | 29 |
| Project Purpose | 29 |
| Logistics..... | 29 |
| Costs Impact Analysis | 29 |
| Other Factors | 30 |
| Environmental Impacts..... | 30 |
| Summary | 31 |
| Alternative 3 – Resource Impact Minimization..... | 31 |
| Overview..... | 31 |
| Project Purpose | 32 |
| Logistics..... | 32 |
| Costs Impact Analysis | 32 |
| Other Factors | 33 |
| Environmental Impacts..... | 33 |
| Summary | 34 |
| Alternative 4 – Reduced Hillside Development | 35 |
| Overview..... | 35 |
| Project Purpose | 35 |
| Logistics..... | 35 |
| Costs | 35 |
| Other Factors | 36 |

| | |
|--|----|
| Environmental Impacts..... | 36 |
| Summary | 37 |
| Alternative 5 – Proposed Project..... | 37 |
| Overview..... | 37 |
| Project Purpose | 38 |
| Logistics..... | 39 |
| Costs Impact Information | 39 |
| Other Factors | 40 |
| Environmental Impacts..... | 40 |
| Alternative 5a – Proposed Project with Additional Avoidance of Intermittent Drainage through the Folsom Plan Area Specific Plan | 41 |
| Overview..... | 41 |
| Project Purpose | 41 |
| Logistics..... | 42 |
| Costs Impact Analysis | 43 |
| Other Factors | 44 |
| Environmental Impacts..... | 45 |
| Summary | 46 |
| Alternative 5b – Proposed Project with Additional Avoidance of Seasonal Wetland Swale through Mall Site to Highway 50..... | 47 |
| Overview..... | 47 |
| Project Purpose | 48 |
| Logistics..... | 48 |
| Costs Impact Analysis | 49 |
| Other Factors | 51 |
| Environmental Impacts..... | 52 |
| Summary | 53 |
| Alternative 5c – Proposed Project with Additional Avoidance of Seasonal Wetland Swale through Mall Site to Scott Road | 54 |
| Overview..... | 54 |
| Project Purpose | 55 |
| Logistics..... | 55 |

| | |
|--|-----------|
| Costs Impact Analysis | 56 |
| Other Factors | 58 |
| Environmental Impacts..... | 59 |
| Summary | 60 |
| Alternative 5d – Proposed Project with Additional Avoidance of Intermittent Drainage on Lot 39 (Carpenter Ranch)..... | 61 |
| Overview..... | 61 |
| Project Purpose | 62 |
| Logistics..... | 62 |
| Costs Impact Analysis | 63 |
| Other Factors | 64 |
| Environmental Impacts..... | 65 |
| Summary | 65 |
| SUMMARY/CONCLUSION | 66 |

LIST OF TABLES

| | |
|---|----|
| Table 1 – Folsom Specific Plan Area Wetland Acreages | 11 |
| Table 2 – Alternatives Land Use and Wetland Summary..... | 21 |
| Table 3 – Alternative 1: No Federal Action | 28 |
| Table 4 – Alternative 2: Centralized Development..... | 31 |
| Table 5 – Alternative 3: Resource Impact Minimization | 34 |
| Table 6 – Alternative 4: Reduced Hillside Development..... | 37 |
| Table 7 – Alternative 5: Proposed Project | 40 |
| Table 8 – Alternative 5a: Proposed Project with Additional Avoidance Areas | 46 |
| Table 9 – Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50..... | 53 |
| Table 10 – Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road..... | 60 |
| Table 11 – Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch..... | 65 |
| Table 12 – Assessment of On-Site Alternatives for Folsom Specific Plan Area | 66 |

LIST OF FIGURES

- Figure 1. Project Site and Vicinity
- Figure 2. Folsom Plan Area Components
- Figure 3. Folsom Plan Area Specific Plan Location and the Folsom General Plan
- Figure 4. Proposed Project Land Use Plan
- Figure 5. Natural Resources Conservation Service Soils Types
- Figure 6. USGS Watersheds
- Figure 7. Wetland Delineation
- Figure 8. Proposed Project - Avoidance/Impact
- Figure 9. Alternative 1: No Federal Action
- Figure 10. Alternative 2: Centralized Development
- Figure 11. Alternative 3: Resource Impact Minimization
- Figure 12. Alternative 4: Reduced Hillside Development
- Figure 13. Alternative 5: Proposed Project
- Figure 14. Alternative 5a: Proposed Project with Additional Avoidance Areas
- Figure 15. Alternative 5a: Proposed Project Land Use Plan with Additional Avoidance Areas
- Figure 16. Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50
- Figure 17. Alternative 5b: Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50
- Figure 18. Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50 - Detail
- Figure 19. Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
- Figure 20. Alternative 5c: Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
- Figure 21. Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road - Detail
- Figure 22. Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch
- Figure 23. Alternative 5d: Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch
- Figure 24. Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch - Detail

LIST OF ATTACHMENTS

- Attachment A – Wetland Delineation Verification Letter
- Attachment B – Land Use and Cost Tables
- Attachment C – Letters Regarding Mall Design Requirements
- Attachment D – Drainage Characterization – Carpenter Ranch

INTRODUCTION

An application package for Department of the Army permits under the authority of Section 404 of the Clean Water Act for the discharge of dredged or fill material to a total of 49.296 acres of aquatic features, including 47.897 acres of waters of the United States was submitted on November 20, 2009. Impacts include onsite development and offsite impacts due to a waterline and other offsite infrastructure such as road improvements and sewer connections. Onsite impacts total 40.754 acres, including 39.499 acres jurisdictional wetlands and 1.254 acres of isolated/non-jurisdictional wetlands.

PROJECT PROPONENT(S)

Each participant (Applicant) included in the application package is listed below. Each has submitted an application or applications for an individual Section 404 permit at this time.

PROJECTS

Folsom Heights

Folsom South

Folsom 138

Carpenter Ranch

APPLICANTS

Hospitality Consultants
8525 Oak Arbor Court
Fair Oaks, California 95628
Contact: Bob Robinson

MJM Properties
1037 Suncast Lane, Suite 111
El Dorado Hills, California 95762
Contact: Mike McDougal

Folsom White Rock Investors, LLC
111 Woodmere Drive, Suite 190
Folsom, California 95630
Contact: Brian Cutting

FPA Land Development
4665 MacArthur Court, Suite 200
Newport Beach, California 92660
Contact: Tim Kihm

Folsom 560 (Hillsborough)

GenCorp Realty Investments
620 Coolidge Drive, Suite 100
Folsom, California 95630
Contact: David Hatch

Prairie City Road Business Park

GenCorp Realty Investments
620 Coolidge Drive, Suite 100
Folsom, California 95630
Contact: David Hatch

Backbone Infrastructure
Off-site Water Line

City of Folsom
Community Development Department
50 Natoma Street, Folsom, California 95630
Contact: Gail Furness de Pardo

AGENT:

Attn: ECORP Consulting, Inc.
Mr. Bjorn Gregersen
2525 Warren Drive
Rocklin, California 95677
Phone: (916) 782-9100
Fax: (916) 728-9134

PROJECT LOCATION

A map illustrating the total project area is shown as *Figure 1. Project Site and Vicinity*. The Folsom Plan Area Specific Plan (SPA), and the areas that might be affected by off-site improvements include portions of the Buffalo Creek, Clarksville, Folsom, and Folsom SE, California, 7.5-minute topographic quadrangles (USGS 1980), Township 9 North, Range 7 East: unsectioned, and Township 9 North, Range 8 East: Sections 15 to 22 (*Figure 2. Folsom Plan Area Components*).

PROJECT DESCRIPTION

The SPA consists of approximately 3,502 acres bordered by Highway 50, Prairie City Road, White Rock Road and the El Dorado County line. The Local Agency Formation Commission (LAFCO) designated this land as part of the City's Sphere of Influence (SOI) in 2001. The City of Folsom intends to annex the SOI Area in order to develop and preserve the property (Figure 3. *Folsom Plan Area Specific Plan Location and the Folsom General Plan*). The proposed development includes mixed-density residential uses, employment-generating land uses (i.e., public, commercial, office and industrial), and active parkland. In addition, the City will maintain 30 percent of the SPA as natural open space that does not include the active parkland. The open space area will contain preserve areas intended to preserve and protect aquatic features, sensitive habitat areas, and cultural resources (Preserve).

The Specific Plan was developed in accordance with the principles of "Smart Growth" embodied by the Sacramento Area Council of Governments (SACOG) Blueprint. As proposed, the SPA will include:

- 1,474.6 acres of residential development,
- 520.7 acres of commercial and employment-generating land uses,
- 110.8-acre site for a regional shopping mall,
- a police station,
- a fire station,
- a municipal services center,
- five elementary schools,
- a joint high school/middle school,
- a water treatment plant,
- associated on-site infrastructure,
- an off-site water supply line
- highway interchanges and crossover roads, and
- an off-site sewer line extension
- a minimum of 1,050 acres of open space including the preserved wetlands.

Measure W and Resolution No. LAFC 1196 passed by the Local Agency Formation Commission (LAFCO) approving the SOI require that a minimum of 30% of the SPA be preserved as natural, undeveloped open space. Approximately 1,050 acres of open space (Open Space) would be included in the proposed project, the majority of which would be located in the western portion of the project site. The Open Space includes Alder Creek, a large concentration of cultural resources sites, and the highest concentration of oak woodland habitat within the project site. A wetland preserve will be located within the Open Space. The Preserve is intended to preserve and protect aquatic features, such as wetlands, creeks, and vernal pools. The Project has been designed to enable each development project to proceed, relying on common infrastructure improvements, but independent of the other development projects. (Figure 4. *Proposed Project Land Use Plan*).

Residential

Single Family Residential (SF)

The SF district permits single-family development, with a density range of 1 to 3.9 dwelling units per area. The primary housing product is anticipated to be single-family detached housing on conventional lots, however half-plexes and second units are encouraged.

Single Family High Density (SFHD)

The SFHD district provides an opportunity to accommodate a variety of housing types. Types may include cluster, courtyard, zero lot line, half-plexes and other attached and detached housing products, containing a density range of 4 to 6.9 dwelling units per acre. Incorporation of diverse and innovative housing alternatives are encouraged to enhance the neighborhood identity and provide opportunities to create for-sale housing at levels attainable to area residents and workers.

Multi-Family Low Density (MLD)

The MLD district provides an opportunity to accommodate a variety of housing types. Types may include cluster, courtyard, zero lot line, half-plexes and other attached and detached housing products, containing a density range of 7 to 11.9 dwelling units per acre. Incorporation of diverse and innovative housing alternatives are encouraged to enhance the neighborhood identity and provide opportunities to create for-sale housing at levels attainable to area residents and workers.

Multi-Family Medium Density (MMD)

The MMD district accommodates attached multi-family housing, including apartment, townhouse and condominiums. The MMD sites are strategically located within the General Commercial, Community Commercial, and near the Regional Commercial and higher intensity uses to promote alternative transportation, through the proximity to goods, services and transportation hubs. These MMD sites will provide both rental and for-sale housing opportunities for the general workforce, with a density range of 12 to 20 dwelling units per acre.

Multi-Family High Density (MHD)

The MHD district accommodates attached multi-family housing, including apartment, townhouse and condominiums. The MHD sites are strategically located within the General Commercial, Community Commercial, and near the Regional Commercial and higher intensity uses to promote alternative transportation, through the proximity to goods, services and transportation hubs. These MHD sites will provide both rental and for-sale housing opportunities for the general workforce, with a density range of 20 to 30 dwelling units per acre.

Non-Residential

Mixed Use (MU)

The MU district will consist of a variety of land uses, including limited residential, commercial, industrial, office, or recreational land uses.

Industrial/Office Park (IND/OP)

Industrial and Office Park uses within the proposed plan area are located primarily in the northern quadrant of the Plan Area, adjacent to Highway 50. These districts will provide the opportunity for a range of users, from large employment centers, light manufacturing and assembly to small professional offices and services.

Community Commercial (CC)

The CC land use component is designed to encompass a wide variety of retail goods and services for the community and neighborhoods. The services within Community Commercial include gas stations, convenient general stores, food service, and other services.

General Commercial (GC)

The GC land use component is designed to accommodate large-format retail users and services. Typical uses will include retail stores, grocery stores, entertainment, restaurants, lodging, indoor and outdoor recreational facilities, and business and professional offices. Retail centers must be located along high-traffic roadways in order to be successful, including near large intersections, major corridors, and freeway off-ramps.

Regional Commercial (RC)

The RC, or Regional Mall, land use component is designed to accommodate large-format retail users, which will draw customers from both Folsom and the surrounding market areas. The

Regional Mall will be the focal point of the project and the key economic feature to the SPA. Typical uses will include large retail stores, anchoring retail centers, entertainment, restaurants, lodging, indoor and outdoor recreational facilities, and business and professional offices. The Regional Mall must be exposed to the high traffic volume, located at the intersection of Scott Road and Easton Valley Road in order to be viable.

Public Uses

Parks (P)

Parks are allocated within the project area, comprised of two Community Parks and seven neighborhood parks. One Community Park is located in the western portion of the project and the other in the eastern portion of the project. Both are adjacent to Open Space areas and are easily accessible via numerous greenways linking the entire SPA. Facilities in the Community Parks are anticipated to include significant active recreation facilities, including ball fields, soccer fields, tennis courts, basketball courts, picnic and playground areas as well as community gathering facilities.

The neighborhood parks are intended to serve as a focal point for each neighborhood, providing a gathering place with smaller scale recreational facilities, such as tot lots, playgrounds, multi-use turf fields, picnic and bbq areas. Many of the parks are co-located with elementary schools.

Public/Quasi-Public (PQP)

The Public and Quasi-Public land use component will consist of public structures or public uses, such as schools, community buildings, and utility facilities. There are seven proposed school sites, including elementary schools, middle schools, and a public high school.

Open Space (OS)

The SPA contains 1,050 acres of open space. The open space areas were designed to capture the site's most valuable resources including Alder Creek and its main tributaries, oak woodland,

and cultural resources. The SPA open space plan focused on providing as large of a contiguous area as possible and then further protecting waters of the U.S. and providing wildlife movement opportunities through the establishment of open space corridors that reach out and protect as many of the drainages and swales on the site as practicable. The open space area and corridors will also contain multi-use trails that will connect residential and commercial areas to services and schools and encourage bicycle and pedestrian transportation.

The open space area, as proposed, was designed to minimize impacts to waters of the U.S. The open space area will avoid and protect a total of 44.191 acres of creek, seasonal swale and other aquatic features. The open space area and corridors are central to the preserve design, promote connectivity of waters and watersheds, avoid isolating wetlands and drainages, avoid impacting natural occurring wetlands over those created artificially through agricultural manipulation, and promote avoidance efficiency by maximizing wetlands avoided per total open space area.

Within this open space area will be a preserve within which waters of the United States will be avoided, preserved, and protected. The SPA Avoidance and Open Space Plan is designed to avoid and minimize impacts to key on-site aquatic resources based on plan and field level investigation of existing wetlands and wetland/swale corridor configurations and planned adjacent land uses. The design of the Preserve maintains the functions and values of significant waters on-site.

In addition, the Avoidance and Open Space Plan places detention basins off-line where possible. Detention basins previously planned to be in-line basins were moved off-line to avoid and minimize impacts to waters of the United States throughout the SPA.

Wetlands within the open space areas will have a minimum of 75 feet of open space buffers. The first 25 feet will be undisturbed natural landscape where no grading, trails or improvements will be allowed. The next 50 feet will be permanent open space, but may include temporary disturbance associated with contour grading, mitigation plantings, trails, benches and other passive recreational amenities. Alder Creek, from the northwest corner of the project to the point where it crosses Street "A" will have 50 foot undisturbed natural landscape buffers.

ENVIRONMENTAL SETTING

Current Conditions

The southern and eastern portion of the property consists primarily of rolling terrain and grasslands. The northwestern portion property consists primarily of rolling terrain and oak woodland. Elevations range from approximately 250 to 800 feet above mean sea level. The majority of the site is currently used for cattle grazing.

Adjacent Land Uses

The SPA is surrounded by agricultural and rural residential land uses to the south. Land west of the project site is owned by the Aerojet-General Corporation and is planned for future residential/commercial development and ongoing Aerojet operations. Land east of the project site lies within El Dorado County and consists of residential housing. Residential and commercial development is located north of the project site, on the opposite side of U.S. 50. Regional access to the project site would be provided from U.S. 50, which also forms the site's northern boundary. Local access to the project site is provided by Prairie City Road, East Bidwell Street, and White Rock Road. Alder Creek transects the SPA diagonally from the south-central portion to the northwest corner of the plan area.

Vegetative Communities

The majority of the land within the SPA is comprised of annual grassland community, composed primarily of non-native annual grasses, including soft chess (*bromus hordeaceus*), ripgut brome (*bromus diandrus*), medusahead grass (*taeniatherum caput-medusae*), slender wild oat (*avena barbata*), and little quaking grass (*briza minor*). Other herbaceous species observed in this community include filaree (*erodium botrys*), bicolored lupine (*lupinus bicolor*), sticky tarweed (*holocarpha virgata*), yellow star-thistle (*centaurea solstitialis*), rose clover (*trifolium hirtum*), shamrock clover (*trifolium dubium*), fremont's tidy-tips (*layia fremontii*), Valley tassels (*castilleja attenuata*), dwarf brodiaea (*brodiaea minor*), and hyacinth brodiaea (*triteleia hyacinthina*). Some areas within the SPA also include Blue oak woodland. Blue oaks (*quercus douglasii*)

represent the dominant tree species in this community. Species observed in the understory were generally similar to those found in the annual grassland.

Soils

According to the Soil Survey of Sacramento County, California (U.S. Department of Agriculture, Soil Conservation Service 1993), 36 soil units, or types, have been mapped within the site (Figure 5. *Natural Resources Conservation Service Soils Types*).

Hydrology

The SPA is located within the Lower American Watershed (#18020111), the Lower Sacramento Watershed (#18020109), the Lower Consumnes-Lower Mokelumne Watershed (#18040005), and the Upper Consumnes Watershed (#18040013) (U.S. Department of Interior, Geological Survey [USGS] 1978). These watersheds are illustrated on Figure 6. *USGS Watersheds*.

Wetlands / Waters of the U.S.

Wetland delineations have been conducted and submitted for each of the participating properties. The following delineations have been verified by the Corps: Carpenter Ranch, Prairie City Business Park, Folsom 560 (Hillsborough), Folsom South, Javanifard and Zarghami, and Folsom Heights. On April 20, 2009, the Sacramento Country Day School verification expired. Based upon the best available information, approximately 83.643 acres of waters of the United States (U.S.) have been delineated within the SPA, including an additional 1.301 acres of isolate/non-jurisdictional features (Figure 7. *Wetland Delineation*). Of the 83.643 acres mapped on-site, development will result in direct impacts to approximately 39.499 acres of waters of the U.S. and avoidance/preservation of approximately 44.144 acres of waters of the U.S.

Each individual property application package provides more detail regarding wetland type and source of impact. In addition to the impacts on the individual participating projects,

development of the common infrastructure elements would result in direct and indirect impacts both within and outside of the participating properties.

Verified jurisdictional wetlands on the site are presented in Table 1 below and verification letters are presented as Attachment A.

| Jurisdictional Wetlands/Waters | Existing |
|---------------------------------------|-----------------|
| Vernal Pool | 4.642 |
| Seasonal Wetland | 4.657 |
| Seasonal Wetland Swale | 25.479 |
| Seep | 10.803 |
| Marsh | 0.211 |
| Creek/Channel | 17.187 |
| Intermittent Drainage | 11.716 |
| Ditch | 1.959 |
| Pond | 6.875 |
| Willow Scrub | 0.114 |
| Total: | 83.643 |
| Isolated / Non-Jurisdictional | |
| Isolated Vernal Pool | 0.031 |
| Isolated Seasonal Wetland | 0.004 |
| Ditch/Canal (NJ) | 0.420 |
| Pond (NJ) | 0.846 |
| Total: | 1.301 |
| Grand Total: | 84.944 |

Wetlands

Vernal Pools

In general, vernal pools are topographic basins that are underlain with an impermeable or semi-permeable hardpan or duripan layer. Direct rainfall and surface runoff inundate the pools during the wet season. The pools remain inundated and/or the soil maintains saturation through spring and they are dry by late spring through the following wet season. Vernal pools are scattered throughout the site. Dominant plants within the vernal pools included annual hairgrass (*Deschampsia danthenioides*), white-head navarretia (*Navarretia leucocephala*), Vasey's coyote-thistle (*Eryngium vaseyi*), Mediterranean barley, slender popcorn-flower (*Plagiobothrys stipitatus*), and dwarf wooly-heads (*Psilocarphus brevissimus*). Other species

found within the vernal pools include downingia (*Downingia* species), dwarf brodiaea (*Brodiaea minor*), Sacramento mesamint (*Pogogyne zizyphoroides*), smooth goldfields (*Lasthenia glaberrima*), creeping spikerush (*Eleocharis macrostachya*), Fitch's spikeweed (*Hemizonia fitchii*), smooth cat's-ear, hairy hawkbit, sticky tarweed, soft chess, and ryegrass.

Seasonal Wetlands

Seasonal wetlands are ephemerally wet due to accumulation of surface runoff and rainwater within low-lying areas. Inundation periods tend to be relatively short and they are commonly dominated by non-native annual, and sometimes perennial, hydrophytic species. Seasonal wetlands occur scattered throughout the site, often in close association with vernal pools, seasonal wetland swales, and ephemeral drainages. Plant species identified within the seasonal wetlands included ryegrass, Mediterranean barley, Vasey's coyote-thistle, sticky tarweed, smooth cat's-ear, Sacramento mesamint, least spikerush (*Eleocharis acicularis*), blow-wives (*Achyraea mollis*), annual hairgrass, marigold navarretia, poverty rush (*Juncus tenuis*), toad rush (*J. bufonius*), hyssop loosestrife (*Lythrum hyssopifolium*), little quaking grass (*Briza minor*), vulpia (*Vulpia bromoides*), nitgrass, Oregon wooly-heads (*Psilocarphus oregonus*), dwarf wooly-heads, annual rabbitsfoot grass (*Polypogon monspeliensis*), bracted popcornflower (*Plagiobothrys bracteatus*), dwarf brodiaea, white-tip clover (*Trifolium varigatum*), small-head clover (*T. microcephalum*), bull clover (*T. fucatum*), barnyard grass (*Echinochloa crus-galli*), swamp grass (*Crypsis schoenoides*), and medusahead grass.

Seasonal Wetland Swales

These are linear wetland features that do not exhibit an ordinary high water mark. Seasonal wetland swales occur throughout the site, often in close association with ephemeral drainages. Plant species identified within the seasonal wetland swales included Vasey's coyote-thistle, sticky tarweed, toad rush, Mediterranean barley, mannagrass (*Glyceria declinata*), little quaking grass, white-tip clover, Sacramento mesamint, dwarf brodiaea, least spikerush, ryegrass, needle-leaf navarretia, vulpia, annual rabbitsfoot grass, annual hairgrass, nitgrass, little quaking grass, hairgrass, annual bluegrass (*Poa annua*), medusahead grass, soft chess, hairy hawkbit, and smooth cat's-ear.

Seep

Seeps are seasonally or perennially wet areas resulting from discharge of groundwater to the surface. A seep occurs in the northeastern portion of the site and is associated with a seasonal wetland. Plant species identified within the seep included barnyard grass, mannagrass, swamp smartweed (*Polygonum hydropiperoides*), water primrose (*Ludwigia peploides*), bull clover, and small-head clover.

Marsh

These marshes occur in areas that are permanently flooded, lack significant water currents, and are dominated by perennial emergent wetland plants that can reach 12 feet in height. Species found in this wetland type include broad-leaved cattail (*Typha latifolia*), as well as several low-growing perennial species. The latter include: rushes (*Juncus effusus*, *J. patens*, and *J. balticus*), tall nutsedge (*Cyperus eragrostis*), and spikerush (*Eleocharis montevidensis*). Vegetation in these wetlands can be very dense forming closed canopies that benefits breeding birds and mammals (Holland, 1986).

Creek/Channel

Alder Creek flows east to west through the northern portion of the site. This creek is identified as a blue-line feature on the "Folsom, California" and "Buffalo Creek, California" 7.5-minute quadrangles. The portion of Alder Creek located within the site conveys perennial flows; however, the creek becomes intermittent in areas within the site. The creek exhibits an ordinary high water mark with bed and bank characteristics. Plant species observed within and adjacent to Alder Creek included cattail, willows (*Salix* species), South American vervain, soft rush (*Juncus effusus*), nutsedge, dallies grass, and Himalayan blackberry.

Wetland hydrology indicators observed within Alder Creek included soil inundation and saturation, water marks, drift lines, and scoured bed and bank. A soil pit was not excavated at the data point location due to the depth of the water. The soil matrix color in an adjacent upland area was 10YR4/3 without mottles.

Intermittent Drainage

Intermittent drainages are also linear features that exhibit an ordinary high water mark. Intermittent drainages differ from ephemeral drainages in that they receive groundwater recharge for all, or a portion, of the year. This usually results in greater flow of water and longer periods of flow, relative to ephemeral drainages. Intermittent drainages tend to be un-vegetated due to the depth and scouring effects of flowing water. Hydrophytic vegetation was present along the upper edges of the intermittent drainages on-site, and in areas where sediment accumulations provide a substrate suitable for plant establishment and growth. Plants observed along the upper edges and in the intermittent drainages include Fremont's cottonwood (*Populus fremontii*), swamp grass, water primrose, Spanish lotus, and swamp smartweed.

Ditch

Numerous constructed ditches occur within the site that pond water for a sufficient period of time during the growing season to support hydrophytic vegetation. These features were constructed on contour; however, they appear to no longer convey flow. Those constructed ditches that have fallen so far into disrepair that they no longer convey or pond water and are dominated by upland-associated plant species were not included on the wetland delineation map, as these features do not qualify as waters of the U.S. Dominant plant species within the constructed ditches included Vasey's coyote-thistle, Carter's buttercup, creeping spikerush, and annual hairgrass. Other species commonly observed within these features included hyssop loosestrife, smooth cat's-ear (*Hypochaeris glabra*), Mediterranean barley, and sticky tarweed.

Ponds

Stock ponds represent ponded areas that were either created or enhanced through the placement of an earthen dam in the course of a drainage and/or through excavation. Stock ponds exhibit an ordinary high water mark. Vegetation within these features generally occurs within the shallower areas along the margins. Plant species observed within and adjacent to the stock ponds included Goodding's black willow (*Salix gooddingii*), Fremont cottonwood

(*Populus fremontii*), cattail, hyssop loosestrife, pennyroyal, dock, spikerush, and Vasey's coyote-thistle.

Wetland hydrology indicators observed at the stock ponds included soil inundation and saturation, water marks, sediment deposits, oxidized root channels, water stained leaves, and FAC-neutral test.

Willow Scrub

This habitat type may be associated with open wetlands and riparian habitats and provides valuable wildlife habitat. Plant species within the Project Areas associated with this type of vegetation include: red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), big-leaf maple (*Acer macrophyllum*), California blackberry, snowberry, poison oak, California buckeye (*Aesculus californica*). Wildlife found in these habitats are diverse including the previously mentioned raptors, songbirds, apodotes, mammals, amphibians, and reptiles.

REGULATORY BACKGROUND

Clean Water Act, Section 404 Application

The Applicants submitted applications to the U.S. Army Corps of Engineers (Corps) for permits to discharge dredged and/or fill materials into waters of the U. S. under the authority of the Corps pursuant to Section 404 of the Clean Water Act on November 20, 2008. Pursuant to these requirements, the Corps will conduct a two-part informational study: 1) the Corps will determine consistency with Section 404 (b)(1) Guidelines to consider practicable alternatives to the dredge or fill of waters of the U. S.; and 2) the Corps will conduct a public interest review. This document provides information to assist the Corps in its process.

Purpose of Alternatives Information

The purpose of this document is to provide information on various alternatives for the Corps to use in its review of the proposed project and potential alternatives.

While it is understood that the information provided in this document must be verified by the Corps, the information provides a fair and objective evaluation of alternatives.

This section presents an overview of the requirements of the 404(b)(1) guidelines and a discussion of the implementing guidance issued by the Corps. The 404(b)(1) guidelines are the substantive criteria used by the Corps in evaluating discharges of dredged or fill material into waters of the U.S. under Section 404 of the Clean Water Act. The guidelines require that four criteria be satisfied in order for the Corps to make a decision that a proposed discharge is in compliance. These criteria are:

1. *The discharge must be the least environmentally damaging practicable alternative.*
2. *The discharge must not violate any water quality standard, toxic effluent standard or jeopardize the continued existence of a threatened or endangered species.*
3. *The discharge must not result in a significant degradation of the waters of the United States.*
4. *Unavoidable impacts to the aquatic ecosystem must be mitigated.*

Before the Corps can issue a permit, they must find that the requirements of the guidelines have been satisfied. The key criteria for most permit applicants, and the focus of this information, is the requirement that the discharge be the least environmentally damaging, practicable alternative. The pertinent section of the regulation states:

“Except as provided under Section 404(b)(2), no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have a less adverse impact on the aquatic ecosystem so long as discharge does not have other significant adverse environmental consequences.

- a. For the purposes of this requirement, practicable alternatives include, but are not limited to:
 - 1) On-site activities that do not include a discharge into waters of the United States or ocean waters,
 - 2) Discharges of dredged or fill material at other locations in waters of the United States or ocean waters,
- b. An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology and logistics in light of overall project purpose. If it is otherwise a practicable alternative, an area not presently owned by the applicant which could reasonably be obtained, utilized, expanded, or managed in order to fulfill the basic purpose of the proposed activity may be considered;
- c. Where the activity associated with a discharge which is proposed for a special aquatic site does not require access or proximity to or siting within the special aquatic site in question to fulfill its basic purpose (i.e., is not "water dependent"), practicable alternatives that do not involve special aquatic sites are presumed to be available unless clearly demonstrated otherwise. In addition, where a discharge is proposed for a special aquatic site, all practicable alternatives to the proposed discharge which do not involve a discharge into a special aquatic site are presumed to have less adverse impact on the aquatic ecosystem, unless clearly demonstrated otherwise."

The key provisions in the language are practicability and overall project purposes. An alternative is practicable if it is available to the applicant and capable of being accomplished by the applicant after consideration of costs, existing technology and logistics, in light of overall purposes. If a practicable alternative would have less impact on the aquatic ecosystem, and does not include other significant adverse impact, then the proposed project is not the least damaging practicable alternative.

ALTERNATIVES

The proposed project will directly impact 39.499 acres of jurisdictional wetlands, which are special aquatic sites as described above (Figure 8. *Proposed Project - Avoidance/Impact*). None of the proposed project components are considered to be water dependent. Therefore, according to the guidelines, less damaging alternatives are presumed to be available unless demonstrated otherwise. The following discussion presents the methodology of the information, followed by an evaluation of the alternatives for determination of the least damaging practicable alternative as compared to the proposed project. Alternatives have been developed and evaluated with the goals of practicability, consistency with the overall project purposes, and avoiding and minimizing impacts to waters of the United States.

The range of alternatives considered includes a No Federal Action alternative, two reduced impact alternatives, a reduced hillside development alternative, the Proposed Project, and six alternatives that consist of the Proposed Project with "Additional Avoidance Areas."

ALTERNATIVES INFORMATION

To assist in determining the least environmentally damaging practicable alternative for the site, the applicant is providing information on the following alternative scenarios:

- **Alternative 1 – No Federal Action**

The No Federal Action Alternative preserves and maintains a buffer of 50 feet to all jurisdictional wetlands (no impact to wetlands or waters), eliminating the need for a Corps permit. This alternative results in the loss of a minimum of 413 acres of land planned for development. Much of the remaining area would also be unusable due to configuration of the "50-foot wetland buffer" preserve and its impact on other issues such as access and infrastructure connections.

- **Alternative 2 – Centralized Development**

The Centralized Development Alternative results in the loss of 398 acres of land planned for development, preserves 46.591 acres and impacts 37.052 acres of waters of the U.S. This alternative focuses primary development in the central portions of the Folsom SPA, with additional development in the southwest portion of the project. Large portions of properties such as Javanifard and Zarghami, Folsom Heights, Folsom 138, become preserved, resulting in disproportionate adverse effects on property development.

- **Alternative 3 – Resource Impact Minimization**

The Resource Impact Minimization Alternative results in the loss of 364 acres of land planned for development, preserves 57.175 acres and impacts 26.468 acres of waters of the U.S. Much of this area would also be unusable due to configuration of the preserve and its affect on other issues such as access and infrastructure. This alternative also affects the Regional Mall land use as it entails an additional preserve through the proposed Regional Mall Site.

- **Alternative 4 – Reduced Hillside Development**

The Reduced Hillside Development Alternative results in a gain of three acres of land planned for development, preserves 40.951 acres and impacts 42.692 acres of waters of the U.S. This alternative focuses on preserving additional hillside, particularly in the eastern portion of the project and impacts more wetlands than the proposed project

- **Alternative 5 – Proposed Project**

A large-scale master planned multi-use, density diverse community with a regional mall and other regional commercial uses in a transit and pedestrian friendly environment.

The Proposed Project preserves 44.144 acres and impacts 39.499 acres of waters of the U.S. The proposed project includes mixed-density residential uses, employment-generating land uses (i.e., public, commercial, office and industrial), and active parkland. The proposed project would maintain 30 percent of the SPA as natural open space that does not include the active parkland. The open space area will contain

preserve areas intended to preserve and protect aquatic features, oaks, sensitive habitat areas, and cultural resources.

- **Alternative 5a – Proposed Project with Additional Avoidance Areas**

This Alternative is the Proposed Project with three additional avoidance areas: 1) An intermittent drainage that occurs in the western portion of the project on Carpenter Ranch, 2) a man-made ditch that occurs on the far western portion of the project on Carpenter Ranch, and 3) A seasonal swale that occurs on the north-central portion of the project on Carpenter Ranch through the proposed mall site.

This Alternative results in the loss of 53.2 acres of land planned for development, preserves 47.332 acres and impacts 36.311 acres of waters of the U.S. This alternative affects the Regional Mall, General Commercial and several Single Family sites on Carpenter Ranch.

- **Alternative 5b – Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50**

The Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50 Alternative results in the loss of 38.9 acres of land planned for development, preserves 47.021 acres and impacts 26.622 acres of waters of the U.S. This alternative affects the Regional Mall land use with an additional preserve through the proposed Regional Mall Site, General Commercial and several Single Family sites on Carpenter Ranch.

- **Alternative 5c – Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road**

The Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road Alternative results in the loss of 29.1 acres of land planned for development, preserves 46.640 acres and impacts 37.003 acres of waters of the U.S. This alternative affects the Regional Mall land use with an additional preserve through the proposed Regional Mall Site.

- **Alternative 5d – Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch**

This alternative involves the additional avoidance of intermittent drainage and man-made ditch in the southwest portion of Carpenter Ranch. The intermittent drainage is located on the eastern side of a large oak woodland preserve and traverses the site from the southeast corner (from under the powerline easement) to the northwest, connecting with the proposed open space area. The man-made ditch is located on the eastern perimeter of the same oak woodland preserve. This alternative results in the loss of 14.3 acres of land planned for development and preserves 44.454 acres and impacts 39.189 acres of waters of the U.S. This alternative results in a loss of Single Family High Density and Multi-Family Low Density lots as well as General Commercial development.

A summary of land use and wetland impact acreages for all the alternatives evaluated is presented below in Table 2.

| | Open Space acreage (acre±) | Developable Net acreage (acre±) | Preserved Waters of U.S. | Impacted Waters of U.S. | Additional Avoidance of Waters of the U.S. |
|-----------------------|------------------------------------|---|---------------------------------|--------------------------------|---|
| Alternative 1 | 1413 | 1874 | 83.643 | 0 | 39.499 |
| Alternative 2 | 1464 | 1889 | 46.591 | 37.052 | 2.447 |
| Alternative 3 | 1429 | 1923 | 57.175 | 26.468 | 13.031 |
| Alternative 4 | 1057 | 2290 | 40.951 | 42.692 | -3.193 |
| Alternative 5 | 1062 | 2287 | 44.144 | 39.499 | 0 |
| Alternative 5a | 1148 | 2201 | 47.332 | 36.311 | 3.188 |
| Alternative 5b | 1101 | 2248 | 47.021 | 36.622 | 2.877 |
| Alternative 5c | 1091 | 2258 | 46.640 | 37.003 | 2.496 |
| Alternative 5d | 1076 | 2273 | 44.454 | 39.189 | 0.319 |

Alternatives Information

The information in this document was developed to provide information to assist the Corps in determining if there are other practicable on-site alternatives utilizing three basic criteria: whether the alternative meets the project purpose, if there are logistical constraints that would render the alternative impracticable, and if the costs associated with development of the project

would make the project impracticable. The logistical information primarily considers whether the infrastructure necessary to support the alternative could be feasibly installed. In addition, the cost information provided considers basic cost factors, including an estimation of the cost of infrastructure and other development costs per developable acre for the Proposed Project and the other alternatives. Finally, for each alternative additional information is also provided regarding environmental factors (impact to wetlands/waters and Federally listed species), as well as other factors that may be considered in regards to regional needs.

Factors Affecting Practicability

1. **Project Purpose** – does the alternative contain sufficient acres of developable area in an appropriate configuration to support a large-scale master planned multi-use, density diverse community with a regional mall and other regional commercial uses in a transit and pedestrian friendly environment in the Folsom Sphere of Influence (SOI)?

The project purpose is to construct a large-scale mixed-use development in eastern Sacramento County. More specifically, the purpose of the Folsom Plan Area Specific Plan is: (1) to construct a large-scale, mixed-use master-planned community consisting of mixed-density residential uses, a regional shopping center, and other employment-generating uses; (2) to provide associated supporting infrastructure including on-site backbone infrastructure, a water treatment plant, schools, parks, an on-site trail system, off-site sewer improvements, off-site roadway improvements, off-site highway interchanges, and an off-site water supply pipeline from the Freeport Regional Water Authority diversion facility to the site; and (3) to permanently protect 30 percent of the site as open space for the preservation of oak woodlands and sensitive habitat areas in a manner consistent with Measure W, a local initiative passed by the voters of Folsom requiring the City to take certain actions in the planning of the SPA prior to the approval of the annexation of this area.

2. **Logistics** – does the alternative conform to the land use plan circulation design and school and park, water treatment, flood control standards, and Measure W requirements?

The proposed project complies with Measure W by providing 30% open space, provides flood protection, water quality treatment, preserves existing cultural resources while providing an appropriate balance of housing, educational, commercial and retail development to ensure a successful and viable development.

3. **Costs Impact Analysis** – does the alternative have a development cost per net developable acre that is not substantially more than that of the proposed project alternative?

The proposed project has a total development cost of \$1,328,325,000, which equates to \$581,000 per developable acre.

4. **Other Factors** – does the alternative have relatively proportionate effects on property owners within the Specific Plan area?

The proposed project provides relatively proportionate distribution of open space requirements and infrastructure costs on the various property owners with the SPA.

5. **Environmental Impacts** – does the alternative have less impacts on waters of the U.S. than the proposed project alternative? Does the alternative have less impacts on Federally listed species than the proposed project alternative?

Wetland delineations have been conducted and submitted for each of the participating properties. The following delineations have been verified by the Corps: Carpenter Ranch, Prairie City Business Park, Folsom 560 (Hillsborough), Folsom South, Javanifard and Zarghami, and Folsom Heights. On April 20, 2009, the Sacramento Country Day School verification expired. Based upon the best available information, approximately 83.643 acres of waters of the United States (U.S.) have

been delineated within the SPA, including an additional 1.301 acres of isolate/non-jurisdictional features. Of the 83.643 acres mapped on-site, the proposed project will result in direct impacts to approximately 39.499 acres of waters of the U.S. and avoidance/preservation of approximately 44.144 acres of waters of the U.S.

Federally listed species that could potentially be affected within the SPA include the threatened valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)(VELB), and species associated with vernal pools including the threatened vernal pool fairy shrimp (*Branchinecta lynchi*), the endangered vernal pool tadpole shrimp (*Lepidurus packardii*), the threatened slender orcutt grass (*Orcuttia tenuis*), and the threatened Sacramento orcutt grass (*Orcuttia viscida*).

Alternative 1 – No Federal Action

Overview

The No Federal Action Alternative preserves and maintains a buffer of 50 feet to all jurisdictional wetlands (no impact to wetlands or waters), eliminating the need for a Corps permit. This alternative results in the loss of a minimum of 413 acres of land planned for development. Much of the remaining area would also be unusable due to configuration of the “50-foot wetland buffer” preserve and its impact on other issues such as access and infrastructure connections.

Project Purpose

The open space corridors and associated buffers required to accomplish this alternative would result in a preserve configuration that does not support a large-scale master planned multi-use, density diverse community with a regional mall and other regional commercial uses in a transit and pedestrian friendly environment. Avoidance of drainage features near the intersection of Easton Valley Parkway and Scott Road would also preclude a successful regional mall from being built on the project site. Open space corridors protecting every drainage on the site would

not yield parcels of sufficient size and/or configuration to support other key elements of the SPA (schools, parks and backbone infrastructure components).

Logistics

In order to preserve wetland features and provide a minimum distance of 50-feet of buffer from the feature, a minimum width, 100-foot wetland buffer corridor was placed around all wetland features. A substantial amount of land area that is not required to provide the 100 foot wide wetland buffer becomes undevelopable due to the resulting land use areas have irregular and inefficient configurations suitable for development. Some of these small irregular land use shapes are completely isolated and surrounded by wetland buffer corridors and cannot be developed. Other small and irregular land use shapes are too narrow to accommodate double loaded streets (houses located on both sides of the street) and only have enough width to allow single loaded streets.

In order to meet City Ordinances in providing secondary emergency vehicle access and evacuation routes to all development units numerous bridge crossings of the wetland buffer corridor are required to development this alternative. Some temporary disturbance of the wetland feature will still be necessary to allow for the construction of bridges crossings over the feature. The bridge crossing would be a free span crossing over the wetland feature so the integrity of the avoided feature can be maintained as much as possible in its current natural state.

Due to the hilly terrain of the Plan Area and the creation of numerous irregular shaped land use areas of the development, numerous small to medium sized sanitary sewer pump stations and force mains would be required to provide sanitary sewer service to a significant portion of the developable land in this Alternative.

This Alternative will require additional storm drainage water quality/detention basins to be added to the storm drainage infrastructure. Dividing a development area with a wetland buffer corridor will typically require the placement of a water quality/detention basin on both sides of the protected feature. Since intermittent drainages are located in the lower areas of a site, a

water quality/detention basin is required on both sides of the wetland preserve corridor to prevent uncontrolled storm runoff releases from entering the wetland preserve corridor and damaging the feature being preserved. Some of the smaller irregular shaped developable land use areas maybe to small to accommodate a water quality/detention basin and may require a storm drainage pump station and force main which pumps storm runoff to another water quality/ detention basin located elsewhere in the Plan Area.

This alternative requires sanitary sewer, water and in some cases storm drainage utilities to be placed under the wetland buffer corridor. In order to minimize the impact to the wetland feature these utilities would have to be placed under the wetland buffer corridor by boring and jacking or by tunneling.

This alternative would require a substantial amount of additional infrastructure in the form of wetland buffer bridge crossings, sanitary sewer and storm drainage pump stations and force mains, water quality/detention basins and boring and jacking of utilities (sanitary sewer, water and storm drains) to avoid impacts to waters of the U.S. A substantial amount of the remaining land area that is not required to provide the wetland buffer to wetland features would be unusable for development due to the resulting irregular and inefficient land use configuration being too narrow to accommodate access roads or required lot depths.

This Alternative does not conform to the land use circulation design or provide an appropriate housing, commercial and retail development balance to ensure a successful and viable development.

Costs Impacts Analysis

In order to quantify the cost impacts of implementing this Alternative a comprehensive cost estimate was prepared that compares the development cost of the Proposed Project with this Alternative (Attachment B).

The Proposed Project Alternative master infrastructure studies were utilized and adjusted to provide a revised infrastructure layout for this Alternative. This revised infrastructure layout

was utilized to in the preparation of the cost estimate for this Alternative. The cost estimate identifies the quantity of infrastructure and development improvements that would be required under this Alternative. Additional improvements such as bridges, boring and jacking of utilities under the wetland buffer corridor and additional storm drainage water quality/detention basins that maybe required are quantified.

As a result of having to construct and provide infrastructure to this Alternative, the total development costs have increased by \$708 million over the cost of the Proposed Project. This Alternatives development cost per net developable acre would be prohibitive at \$1,087,000, an increase of approximately \$506,000 in relation to the Proposed Project. Also, under this Alternative approximately 3,800 fewer residential units would be constructed, adding significant and unreasonable costs to the remaining dwelling units.

Other Factors

This alternative would have significant adverse effects on all of the property owners in the Specific Plan Area, however the effects would be relatively proportionate.

Environmental Impacts

The "No Federal Action" alternative would be superior to the Project in regards to impacts to wetlands and waters of the U.S., as no wetlands/waters of the U.S. would be impacted (Table 3). Although the alternative could still potentially impact Federally listed species or habitat, due to the avoidance of wetlands and waters, the impacts to special-status species would likely be reduced.

Table 3 – Alternative 1: No Federal Action

| <u>Jurisdictional Wetlands/Waters</u> | <u>Project</u> | | <u>Backbone</u> | <u>Interchange</u> | <u>Total</u> | <u>Total</u> | <u>Total</u> |
|---|----------------|---------------|-----------------|--------------------|------------------|---------------|-----------------|
| | <u>Avoided</u> | <u>Impact</u> | <u>Impact</u> | <u>Impact</u> | <u>Avoidance</u> | <u>Impact</u> | <u>Existing</u> |
| Vernal Pool | 4.642 | 0.000 | 0.000 | 0.000 | 4.642 | 0.000 | 4.642 |
| Seasonal Wetland | 4.657 | 0.000 | 0.000 | 0.000 | 4.657 | 0.000 | 4.657 |
| Seasonal Wetland Swale | 25.479 | 0.000 | 0.000 | 0.000 | 25.479 | 0.000 | 25.479 |
| Seep | 10.803 | 0.000 | 0.000 | 0.000 | 10.803 | 0.000 | 10.803 |
| Marsh | 0.211 | 0.000 | 0.000 | 0.000 | 0.211 | 0.000 | 0.211 |
| Creek/Channel | 17.187 | 0.000 | 0.000 | 0.000 | 17.187 | 0.000 | 17.187 |
| Intermittent Drainage | 11.716 | 0.000 | 0.000 | 0.000 | 11.716 | 0.000 | 11.716 |
| Ditch | 1.959 | 0.000 | 0.000 | 0.000 | 1.959 | 0.000 | 1.959 |
| Pond | 6.875 | 0.000 | 0.000 | 0.000 | 6.875 | 0.000 | 6.875 |
| Willow Scrub | 0.114 | 0.000 | 0.000 | 0.000 | 0.114 | 0.000 | 0.114 |
| Total | 83.643 | 0.000 | 0.000 | 0.000 | 83.643 | 0.000 | 83.643 |
| <u>Isolated/Non-Jurisdictional</u> | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Isolated Vernal Pool | 0.031 | 0.000 | 0.000 | 0.000 | 0.031 | 0.000 | 0.031 |
| Isolated Seasonal Wetland | 0.004 | 0.000 | 0.000 | 0.000 | 0.004 | 0.000 | 0.004 |
| Ditch/Canal (NJ) | 0.420 | 0.000 | 0.000 | 0.000 | 0.420 | 0.000 | 0.420 |
| Pond (NJ) | 0.846 | 0.000 | 0.000 | 0.000 | 0.846 | 0.000 | 0.846 |
| Total | 1.301 | 0.000 | 0.000 | 0.000 | 1.301 | 0.000 | 1.301 |
| Grand Total | 84.944 | 0.000 | 0.000 | 0.000 | 84.944 | 0.000 | 84.944 |

Summary

This alternative would result in the following affects on the project:

- It does not allow for successful implementation of a large-scale master planned multi-use, density diverse community with a regional mall and other regional commercial uses in a transit and pedestrian friendly environment.
- The cost per developable acre is \$506,000 higher than the proposed project cost.
- The preserve configuration would preclude practicable installation of backbone infrastructure.
- It precludes the development of a successful regional mall at the intersection of Easton Valley Parkway and Scott Road.
- The loss of 3,800 dwelling units and an additional cost of \$708 million.

Alternative 2 – Centralized Development

Overview

This alternative focuses development on the central portion of the SPA and open space in the northwestern and eastern portions of the SPA. This alternative puts an emphasis on higher densities and would result approximately 400 acres of lost developable acreage. This alternative preserves most of the land east of Old Placerville Road, but preserves only one drainage through the center of the site.

Project Purpose

The increase of 400 acres of open space would result in the loss of 1,185 dwelling units, primarily on the eastern side of the project, putting an unbalanced burden on the Folsom South, Folsom Heights, and Folsom 138 projects. This alternative would support a regional mall at the intersection of Easton Valley Parkway and Scott Road, allow for schools and other backbone infrastructure to be constructed in an efficient manner.

Logistics

This Alternative would conform to the land use plan circulation design, provides water quality treatment, schools, parks, flood control standards and meets Measure W requirements.

Costs Impact Analysis

In order to quantify the cost impacts of implementing this Alternative a comprehensive cost estimate was prepared that compares the development cost of the Proposed Project with this Alternative (Attachment B).

The Proposed Project Alternative master infrastructure studies were utilized and adjusted to provide a revised infrastructure layout for this Alternative. This revised infrastructure layout was utilized to in the preparation of the cost estimate for this Alternative. The cost estimate

identifies the quantity of infrastructure and development improvements that would be required under this Alternative. Additional improvements such as bridges, boring and jacking of utilities under the wetland buffer corridor and additional storm drainage water quality/detention basins that maybe required are quantified.

As a result of having to construct and provide infrastructure to this Alternative, the total development costs have decreased by \$126 million from the cost of the Proposed Project. However, due to less developable land this Alternatives development cost per net developable acre increases to \$636,000, an increase of approximately \$55,000 in relation to the Proposed Project. Also, under the Alternative, approximately 1,185 fewer residential units would be constructed, adding significant costs to the remaining dwelling units.

Other Factors

This alternative would have a significantly inequitable open space burden on the Folsom South, Folsom Heights, and Folsom 138 projects.

Environmental Impacts

The "Centralized Development" alternative would not in a significant reduction of impacts to wetlands and waters of the U.S., as impacts to waters of the U.S. are estimated at 37.052 acres (Table 4). In addition, the alternative would still potentially impact Federally listed species or habitat and provides very limited connectivity between open space areas. Only one drainage connects the two large preserves that would be established under this alternative. Several of the drainages that would be preserved under this alternative would be impacted downstream from where they leave the eastern preserve (near Old Placerville Road), resulting in fragmented sections of drainages that do not provide wildlife corridors or connect to downstream resources.

Table 4 – Alternative 2: Centralized Development

| Jurisdictional Wetlands/Waters | Project | | Backbone | Interchange | Total | Total | Total |
|---------------------------------------|----------------|---------------|-----------------|--------------------|------------------|---------------|-----------------|
| | Avoided | Impact | Impact | Impact | Avoidance | Impact | Existing |
| Vernal Pool | 1.510 | 2.503 | 0.615 | 0.014 | 1.510 | 3.132 | 4.642 |
| Seasonal Wetland | 1.329 | 2.593 | 0.736 | 0.000 | 1.329 | 3.328 | 4.657 |
| Seasonal Wetland Swale | 7.703 | 11.666 | 5.897 | 0.214 | 7.703 | 17.776 | 25.479 |
| Seep | 8.230 | 1.874 | 0.699 | 0.000 | 8.230 | 2.573 | 10.803 |
| Marsh | 0.157 | 0.041 | 0.012 | 0.000 | 0.157 | 0.054 | 0.211 |
| Creek/Channel | 13.846 | 1.542 | 1.189 | 0.610 | 13.846 | 3.342 | 17.187 |
| Intermittent Drainage | 7.475 | 2.367 | 1.847 | 0.027 | 7.475 | 4.242 | 11.716 |
| Ditch | 0.629 | 1.024 | 0.304 | 0.002 | 0.629 | 1.330 | 1.959 |
| Pond | 5.713 | 1.002 | 0.159 | 0.000 | 5.713 | 1.161 | 6.875 |
| Willow Scrub | 0.000 | 0.000 | 0.000 | 0.114 | 0.000 | 0.114 | 0.114 |
| Total | 46.591 | 24.612 | 11.458 | 0.982 | 46.591 | 37.052 | 83.643 |
| Isolated/Non-Jurisdictional | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Isolated Vernal Pool | 0.022 | 0.009 | 0.000 | 0.000 | 0.022 | 0.009 | 0.031 |
| Isolated Seasonal Wetland | 0.003 | 0.000 | 0.001 | 0.000 | 0.003 | 0.001 | 0.004 |
| Ditch/Canal (NJ) | 0.000 | 0.369 | 0.051 | 0.000 | 0.000 | 0.420 | 0.420 |
| Pond (NJ) | 0.000 | 0.846 | 0.000 | 0.000 | 0.000 | 0.846 | 0.846 |
| Total | 0.025 | 0.000 | 0.000 | 0.000 | 0.025 | 1.276 | 1.301 |
| Grand Total | 46.617 | 25.835 | 11.511 | 0.982 | 46.617 | 38.328 | 84.944 |

Summary

This alternative would result in the following affects on the project:

- The cost per developable acre is \$55,000 higher than the proposed project cost.
- Approximately 1,185 fewer dwelling units would be constructed, adding significant cost to the remaining dwelling units.
- This alternative would have a significantly disproportionate open space burden on the Folsom South, Folsom Heights, and Folsom 138 projects.
- The alternative does not result in significantly less impacts to waters of the U.S.

Alternative 3 – Resource Impact Minimization

Overview

This alternative focuses on providing additional avoidance of biological and cultural resources on the project site. Significant areas of open space, protecting cultural resources, avoiding waters of the U.S. and providing connectivity among open space areas would be included under

this alternative. The project would be reconfigured and development area reduced to provide less residential, less traffic and less air quality impacts.

Project Purpose

Additional avoidance areas under this alternative would result in the loss of approximately 364 acres of developable land and 2,245 dwelling units. Avoidance of drainage features near the intersection of Easton Valley Parkway and Scott Road would also preclude a successful regional mall from being built on the project site. This alternative would preclude the Country Day School from being developed and result in significantly inequitable open space burdens on Carpenter Ranch and Prairie City Road Business Park.

Logistics

This Alternative does conform to the land use plan circulation design, provides water quality treatment, schools, parks, flood control standards and meets Measure W requirements. However, this Alternative does not provide an appropriate housing, commercial and retail development balance to ensure a successful and viable development.

Costs Impact Analysis

In order to quantify the cost impacts of implementing this Alternative a comprehensive cost estimate was prepared that compares the development cost of the Proposed Project with this Alternative (See Attachment B).

The Proposed Project Alternative master infrastructure studies were utilized and adjusted to provide a revised infrastructure layout for this Alternative. This revised infrastructure layout was utilized to in the preparation of the cost estimate for this Alternative. The cost estimate identifies the quantity of infrastructure and development improvements that would be required under this Alternative. Additional improvements such as bridges, boring and jacking of utilities under the wetland buffer corridor and additional storm drainage water quality/detention basins that maybe required are quantified.

As a result of having to construct and provide infrastructure to this Alternative, the total development costs have increased by \$331 million over the cost of the Proposed Project. This Alternatives development cost per net developable acre increases to \$863,000, an increase of approximately \$282,000 in relation to the Proposed Project. Also, approximately 2,245 fewer residential units would be constructed, adding significant costs to the remaining dwelling units.

In addition, this Alternative would cause the Country Day School Site to be undevelopable as school site

Other Factors

This alternative does not have relatively proportionate effects on property owners within the Specific Plan area. Country Day School, Prairie City Road Business Park, and Carpenter Ranch are inequitably impacted by the open space areas required to implement this alternative.

Environmental Impacts

The "Resource Impact Minimization" alternative would be an improvement in regards to impacts to wetlands and waters of the U.S., as impacts to waters of the U.S. are estimated at 26.468 acres, but the alternative would not significantly reduce impacts to Federally listed species or potential habitat (Table 5).

Table 5 – Alternative 3: Resource Impact Minimization

| <u>Jurisdictional Wetlands/Waters</u> | <u>Project</u> | | <u>Backbone</u> | <u>Interchange</u> | <u>Total</u> | <u>Total</u> | <u>Total</u> |
|---------------------------------------|----------------|---------------|-----------------|--------------------|------------------|---------------|-----------------|
| | <u>Avoided</u> | <u>Impact</u> | <u>Impact</u> | <u>Impact</u> | <u>Avoidance</u> | <u>Impact</u> | <u>Existing</u> |
| Vernal Pool | 3.301 | 0.712 | 0.615 | 0.014 | 3.301 | 1.341 | 4.642 |
| Seasonal Wetland | 1.982 | 1.939 | 0.736 | 0.000 | 1.982 | 2.675 | 4.657 |
| Seasonal Wetland Swale | 12.124 | 7.244 | 5.897 | 0.214 | 12.124 | 13.355 | 25.479 |
| Seep | 9.194 | 0.910 | 0.699 | 0.000 | 9.194 | 1.609 | 10.803 |
| Marsh | 0.171 | 0.028 | 0.012 | 0.000 | 0.171 | 0.040 | 0.211 |
| Creek/Channel | 14.975 | 0.413 | 1.189 | 0.610 | 14.975 | 2.213 | 17.187 |
| Intermittent Drainage | 8.677 | 1.166 | 1.847 | 0.027 | 8.677 | 3.040 | 11.716 |
| Ditch | 1.039 | 0.614 | 0.304 | 0.002 | 1.039 | 0.920 | 1.959 |
| Pond | 5.713 | 1.002 | 0.159 | 0.000 | 5.713 | 1.161 | 6.875 |
| Willow Scrub | 0.000 | 0.000 | 0.000 | 0.114 | 0.000 | 0.114 | 0.114 |
| Total | 57.175 | 14.028 | 11.458 | 0.982 | 57.175 | 26.468 | 83.643 |
| Isolated/Non-Jurisdictional | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Isolated Vernal Pool | 0.022 | 0.009 | 0.000 | 0.000 | 0.022 | 0.009 | 0.031 |
| Isolated Seasonal Wetland | 0.003 | 0.000 | 0.001 | 0.000 | 0.003 | 0.001 | 0.004 |
| Ditch/Canal (NJ) | 0.023 | 0.346 | 0.051 | 0.000 | 0.023 | 0.397 | 0.420 |
| Pond (NJ) | 0.727 | 0.119 | 0.000 | 0.000 | 0.727 | 0.119 | 0.846 |
| Total | 0.775 | 0.474 | 0.000 | 0.000 | 0.775 | 0.526 | 1.301 |
| Grand Total | 57.950 | 14.502 | 11.511 | 0.982 | 57.950 | 26.995 | 84.944 |

Summary

This alternative would result in the following affects on the project:

- It does not allow for successful implementation of a large-scale master planned multi-use, density diverse community with a regional mall and other regional commercial uses in a transit and pedestrian friendly environment.
- The total cost of development is \$331 million more than the proposed project which equates to \$282,000 more per developable acre than the proposed project cost.
- The preserve configuration would preclude practicable installation of backbone infrastructure.
- The alternative precludes the development of a successful regional mall at the intersection of Easton Valley Parkway and Scott Road.
- The loss of 2,245 dwelling units would put a significant burden on the remaining units.
- This alternative would have a significantly disproportionate open space burden on the Country Day School, Prairie City Business Park and Carpenter Ranch properties.

Alternative 4 – Reduced Hillside Development

Overview

The focus of this alternative is to preserve additional areas on the hillsides located on the eastern portion of the project. The additional open space areas will preserve some biological and cultural resources, but are primarily aimed at preserving the view-shed or aesthetics of the hillside. Open Space and Development acreages are nearly the same as those of the proposed project.

Project Purpose

This alternative provides adequate and appropriately configured developable land to implement the project purpose, including a regional mall at the intersection of Easton Valley Parkway and Scott Road. While developable land remains nearly the same as the proposed project at approximately 2290 acres, this alternative would provide 2,785 additional dwelling units.

Logistics

This Alternative would conform to the land use plan circulation design, provide water quality treatment, schools, parks, flood control standards and meet Measure W requirements.

Costs

In order to quantify the cost impacts of implementing this Alternative a comprehensive cost estimate was prepared that compares the development cost of the Proposed Project with this Alternative (See Attachment B).

The Proposed Project Alternative master infrastructure studies were utilized and adjusted to provide a revised infrastructure layout for this Alternative. This revised infrastructure layout was utilized to in the preparation of the cost estimate for this Alternative. The cost estimate identifies the quantity of infrastructure and development improvements that would be required

under this Alternative. Additional improvements such as bridges, boring and jacking of utilities under the wetland buffer corridor and additional storm drainage water quality/detention basins that maybe required are quantified.

As a result of having to construct and provide infrastructure to this Alternative, the total development costs have increased by approximately \$10 million over the cost of the Proposed Project. This Alternatives development cost per net developable acre increases to \$584,000, an increase of approximately \$3,000 in relation to the Proposed Project. Also, approximately 2,785 more residential units would be constructed under this Alternative.

Other Factors

This alternative does not have relatively proportionate effects on property owners within the Specific Plan area. Folsom South, Folsom Heights and Folsom 138 are inequitably impacted by the open space areas required to implement this alternative

Environmental Impacts

The "Reduced Hillside Development" alternative results in an increase in impacts to wetlands and waters of the U.S., as impacts to waters of the U.S. are estimated at 42.692 acres (Table 6). There would be no connectivity of the two large preserves that would be established under this alternative. Several of the drainages that would be preserved under this alternative would be impacted downstream from where they leave the eastern preserve (near Old Placerville Road), resulting in fragmented sections of drainages that do not provide wildlife corridors or connect to downstream resources.

Table 6 – Alternative 4: Reduced Hillside Development

| <u>Jurisdictional Wetlands/Waters</u> | <u>Project</u> | | <u>Backbone</u> | <u>Interchange</u> | <u>Total</u> | <u>Total</u> | <u>Total</u> |
|---------------------------------------|----------------|---------------|-----------------|--------------------|------------------|---------------|-----------------|
| | <u>Avoided</u> | <u>Impact</u> | <u>Impact</u> | <u>Impact</u> | <u>Avoidance</u> | <u>Impact</u> | <u>Existing</u> |
| Vernal Pool | 1.155 | 2.857 | 0.615 | 0.014 | 1.155 | 3.487 | 4.642 |
| Seasonal Wetland | 0.941 | 2.980 | 0.736 | 0.000 | 0.941 | 3.716 | 4.657 |
| Seasonal Wetland Swale | 5.404 | 13.965 | 5.897 | 0.214 | 5.404 | 20.075 | 25.479 |
| Seep | 6.608 | 3.496 | 0.699 | 0.000 | 6.608 | 4.195 | 10.803 |
| Marsh | 0.157 | 0.041 | 0.012 | 0.000 | 0.157 | 0.054 | 0.211 |
| Creek/Channel | 13.802 | 1.585 | 1.189 | 0.610 | 13.802 | 3.385 | 17.187 |
| Intermittent Drainage | 7.084 | 2.758 | 1.847 | 0.027 | 7.084 | 4.632 | 11.716 |
| Ditch | 0.510 | 1.143 | 0.304 | 0.002 | 0.510 | 1.449 | 1.959 |
| Pond | 5.289 | 1.427 | 0.159 | 0.000 | 5.289 | 1.586 | 6.875 |
| Willow Scrub | 0.000 | 0.000 | 0.000 | 0.114 | 0.000 | 0.114 | 0.114 |
| Total | 40.951 | 30.252 | 11.458 | 0.982 | 40.951 | 42.692 | 83.643 |
| Isolated/Non-Jurisdictional | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Isolated Vernal Pool | 0.019 | 0.013 | 0.000 | 0.000 | 0.019 | 0.013 | 0.031 |
| Isolated Seasonal Wetland | 0.003 | 0.001 | 0.001 | 0.000 | 0.003 | 0.002 | 0.004 |
| Ditch/Canal (NJ) | 0.000 | 0.369 | 0.051 | 0.000 | 0.000 | 0.420 | 0.420 |
| Pond (NJ) | 0.000 | 0.846 | 0.000 | 0.000 | 0.000 | 0.846 | 0.846 |
| Total | 0.021 | 1.228 | 0.000 | 0.000 | 0.021 | 1.280 | 1.301 |
| Grand Total | 40.972 | 31.480 | 11.511 | 0.982 | 40.972 | 43.973 | 84.944 |

Summary

This alternative would result in the following affects on the project:

- The alternative results in greater impacts to waters of the U.S.
- This alternative would have a significantly disproportionate open space burden on the Folsom South, Folsom Heights, and Folsom 138 projects.

Alternative 5 – Proposed Project

Overview

The proposed project consists of approximately 3,510 acres bordered by Highway 50, Prairie City Road, White Rock Road and the El Dorado County line. The Local Agency Formation Commission (LAFCO) designated this land as part of the City's Sphere of Influence (SOI) in 2001. The City of Folsom intends to annex the SOI Area in order to develop and preserve the property. The proposed development includes mixed-density residential uses, employment-generating land uses (i.e., public, commercial, office and industrial), and active parkland. In addition, the City will maintain 30 percent of the SPA as natural open space that does not

include the active parkland. The open space area will contain preserve areas intended to preserve and protect aquatic features, sensitive habitat areas, and cultural resources (Preserve).

The proposed project was developed in accordance with the principles of "Smart Growth" embodied by the Sacramento Area Council of Governments (SACOG) Blueprint. As proposed, the proposed project will include approximately 1,482 acres of residential development, 507 acres of commercial and employment-generating land uses, 110-acre site for a regional shopping mall, a police station, a fire station, a municipal services center, five elementary schools, a joint high school/middle school, a water treatment plant, associated on-site infrastructure, an off-site water supply line, highway interchanges and crossover roads, and, an off-site sewer line extension, and a minimum of 1,062 acres of open space including the preserved wetlands.

Measure W and Resolution No. LAFC 1196 passed by the Local Agency Formation Commission (LAFCO) approving the SOI require that a minimum of 30% of the SPA be preserved as natural, undeveloped open space. Approximately 1,062 acres of open space (Open Space) would be included in the proposed project, the majority of which would be located in the western portion of the project site. The Open Space includes Alder Creek, a large concentration of cultural resources sites, and the highest concentration of oak woodland habitat within the project site. A wetland preserve will be located within the Open Space. The Preserve is intended to preserve and protect aquatic features, such as wetlands, creeks, and vernal pools. The Project has been designed to enable each development project to proceed, relying on common infrastructure improvements, but independent of the other development projects.

Project Purpose

The purpose of the Folsom Plan Area Specific Plan is: (1) to construct a large-scale, mixed-use master-planned community consisting of mixed-density residential uses, a regional shopping center, and other employment-generating uses; (2) to provide associated supporting infrastructure including on-site backbone infrastructure, a water treatment plant, schools, parks, an on-site trail system, off-site sewer improvements, off-site roadway improvements, off-site

highway interchanges, and an off-site water supply pipeline from the Freeport Regional Water Authority diversion facility to the site; and (3) to permanently protect 30 percent of the site as open space for the preservation of oak woodlands and sensitive habitat areas in a manner consistent with Measure W, a local initiative passed by the voters of Folsom requiring the City to take certain actions in the planning of the SPA prior to the approval of the annexation of this area.

Logistics

The Proposed project complies with the principles of "Smart Growth" embodied by the SACOG Blueprint. The proposed project complies with Measure W by providing 30% open space. The open space includes a large concentration of cultural resources sites, oak woodlands and wetland preserve areas. The Proposed Project conforms to the land use circulation design provides flood protection, water quality treatment and preserves existing cultural resources while providing an appropriate balance of housing, educational, commercial and retail development to ensure a successful and viable development.

Costs Impacts Analysis

In order to quantify the cost impacts of implementing this proposed project, a comprehensive cost estimate (See Attachment B) was prepared that itemizes the major components of the backbone infrastructure.

The cost estimate utilized the master storm drainage, sanitary sewer and potable water studies prepared for the project. Also utilized to determine infrastructure cost was a detailed roadway analysis. Every major roadway and secondary roadway within the Plan Area had a detailed plan and profile analysis prepared so impacts to any adjacent wetland features could be quantified. The roadway analysis was also used for quantifying the roadway excavation volumes, cross-section quantities, bridges lengths and locations.

The cost of implementing the proposed project has been calculated to be \$1,328,352,000. This development cost equates to approximately \$581,000 per net developable acre. The proposed project will have approximately 10,210 dwelling units.

Other Factors

The proposed project provides proportionate distribution of open space requirements and infrastructure costs on the various property owners within the SPA.

Environmental Impacts

Wetland delineations have been conducted and submitted for each of the participating properties. The following delineations have been verified by the Corps: Carpenter Ranch, Prairie City Business Park, Folsom 560 (Hillsborough), Folsom South, Javanifard and Zarghami, and Folsom Heights. On April 20, 2009, the Sacramento Country Day School verification expired. Based upon the best available information, approximately 83.643 acres of waters of the United States (U.S.) have been delineated within the SPA with an additional 1.301 acres of isolate/non-jurisdictional features. Of the 83.643 acres mapped on-site, the proposed project will result in direct impacts to approximately 39.499 acres of waters of the U.S. and avoidance/preservation of approximately 44.144 acres of waters of the U.S. (Table 7).

| Jurisdictional Wetlands/Waters | Project | | Backbone | Interchange | Total | Total | Total |
|---------------------------------------|----------------|---------------|-----------------|--------------------|------------------|---------------|-----------------|
| | Avoided | Impact | Impact | Impact | Avoidance | Impact | Existing |
| Vernal Pool | 1.723 | 2.289 | 0.615 | 0.014 | 1.723 | 2.919 | 4.642 |
| Seasonal Wetland | 0.784 | 3.138 | 0.736 | 0.000 | 0.784 | 3.873 | 4.657 |
| Seasonal Wetland Swale | 7.847 | 11.521 | 5.897 | 0.214 | 7.847 | 17.632 | 25.479 |
| Seep | 6.325 | 3.778 | 0.699 | 0.000 | 6.325 | 4.478 | 10.803 |
| Marsh | 0.142 | 0.056 | 0.012 | 0.000 | 0.142 | 0.069 | 0.211 |
| Creek/Channel | 13.809 | 1.579 | 1.189 | 0.610 | 13.809 | 3.378 | 17.187 |
| Intermittent Drainage | 7.252 | 2.591 | 1.847 | 0.027 | 7.252 | 4.465 | 11.716 |
| Ditch | 0.554 | 1.099 | 0.304 | 0.002 | 0.554 | 1.405 | 1.959 |
| Pond | 5.708 | 1.008 | 0.159 | 0.000 | 5.708 | 1.167 | 6.875 |
| Willow Scrub | 0.000 | 0.000 | 0.000 | 0.114 | 0.000 | 0.114 | 0.114 |
| Total | 44.144 | 27.059 | 11.458 | 0.982 | 44.144 | 39.499 | 83.643 |
| Isolated/Non-Jurisdictional | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Isolated Vernal Pool | 0.019 | 0.013 | 0.000 | 0.000 | 0.019 | 0.013 | 0.031 |
| Isolated Seasonal Wetland | 0.003 | 0.001 | 0.001 | 0.000 | 0.003 | 0.002 | 0.004 |
| Ditch/Canal (NJ) | 0.026 | 0.343 | 0.051 | 0.000 | 0.026 | 0.394 | 0.420 |
| Pond (NJ) | 0.000 | 0.846 | 0.000 | 0.000 | 0.000 | 0.846 | 0.846 |
| Total: | 0.047 | 1.202 | 0.000 | 0.000 | 0.047 | 1.254 | 1.301 |
| Grand Total: | 44.191 | 28.261 | 11.511 | 0.982 | 44.191 | 40.754 | 84.944 |

Alternative 5a – Proposed Project with Additional Avoidance of Intermittent Drainage through the Folsom Plan Area Specific Plan

Overview

This alternative (Figure 14. *Alternative 5a: Proposed Project with Additional Avoidance Areas*) involves the additional avoidance of seasonal swale and intermittent drainage areas located throughout the Plan Area. The open space corridors required to preserve these drainages impact lots 39, 51, 52, 53, 43, and 65. The drainages are typically extensions of a drainage currently proposed to be preserved. The extension typically begins at a proposed open space lot and traverses through the development site upstream to the headwaters of the drainage.

Project Purpose

The extension of the open space corridors impact Single Family Lots 39 and 51 thru 53, General Commercial Lot 65, and Regional Commercial Lot 43 (Mall Site). The developable area for this Alternative would be approximately 329.5 acres and the avoidance areas reduce that area by 53.2 acres. Single Family residential development would be reduced by 26.2 acres, General Commercial development area would be reduced by 9.8 acres, Regional Commercial development area would be reduced by 17.2 acres. In addition to the loss of 53.2 acres of developable land, this alternative would eliminate 128 dwelling units and 316,507 square feet of commercial building area.

Due to the location and alignment of the 150-foot wide wetland buffer corridor significant portions of Lot 43 and Lot 65 are cut-off and isolated from the main development area of each site. Also due to the meandering nature of the intermittent drainage the wetland buffer corridor is wider than the minimum 150-foot width through a majority of Lots 43 and 65 further impacting these lots.

Logistics

In order to preserve these wetland features and provide a minimum distance of 75-feet of buffer from the feature, a 150-foot minimum width wetland corridor needs to be incorporated into the land use plan for this area of the development. A wide wetland corridor extended through these areas of the Project requires revised street circulation and lotting patterns for the single family developments, and revised site plans for the regional commercial and general commercial lots.

The extension of the wetland corridor would require significant changes to the Project's backbone infrastructure. Four major roadway bridges, two secondary roadway bridges, seven internal roadway bridges three pedestrian bridges are required to be constructed over the wetland corridors. The various sanitary sewer and water utilities that serve the Project will need to be bored and jacked under the wetland buffer corridor at eighteen locations. One sanitary sewer lift station and force main is required to be added to the sanitary sewer infrastructure to serve an isolated portion of a development area. Two water quality/detention basins needs to be relocated and two additional water quality/detention basins needs to be incorporated into the storm drainage backbone infrastructure. Additionally, since a bridge will be constructed with this alternative at the wetland crossing at Prairie City Road, the backbone trunk sewer in this roadway needs to be deepened by approximately eight (8) feet.

Due to the location and alignment of the 150-foot wide wetland buffer corridor a significant area of Lot 43 is lost. To try and make-up for some of this lost area and utilize as much available land for retail buildings, parking structures have been added to the Regional Mall Site plan. Therefore some of the lost building square footage area would need to be recovered by installation of two 750-stall parking structures. The cost impacts section includes the cost for only 625 stalls, since 150 parking stalls would need be constructed at ground level under the proposed project.

The extension of the wetland corridor requires some temporary disturbance of the wetland feature to allow for the construction of the 13 street crossings and three pedestrian crossings over the corridors. The street crossing would be a free span crossing over the wetland feature

so the integrity of the avoided feature can be maintained as much as possible in its current natural state.

Costs Impact Analysis

In order to quantify the cost impacts of implementing this alternative an estimate was prepared that compares the site development cost of the Proposed Project and the this alternative. The unit prices from the Preliminary Cost Estimate, Folsom Plan Area, Proposed Project Estimate dated January 30, 2009 were utilized for the cost impacts analysis.

The cost impacts analysis is divided into three sections. One section identifies the cost impacts due to the loss of land use efficiency. The most efficient single family lotting pattern is a grid system of lots and streets. Incorporating a corridor through a single family site reduces the efficiency of the grid lotting pattern and reduces the number of units that can be yielded per acre.

Another section of the cost impacts analysis quantifies the Project Specific One-Time Cost Burdens. The size and cost of the backbone infrastructure improvements such as water treatment plants, regional sanitary sewer pump stations, drainage detention basins, freeway interchanges, arterial and collector roadways do not change due to the loss of single family units and commercial area therefore these cost are spread over fewer lots. The cost for required public facilities and services do change due to the loss of single family units since the population is reduced that require these types of facilities. The public facilities and services such as fire and police personnel, stations and equipment, libraries, community centers and similar public amenities are reduced due to the smaller population within the Plan Area and have also been included in the cost impacts analysis.

The third section of the cost impacts analysis identifies the additional cost of on-site and off-site infrastructure improvements that would be required under this Alternative. Additional off-site improvements such as bridges, boring and jacking of utilities under the wetland buffer corridor and additional storm drainage water quality/detention basins are also quantified. Dividing a development area with a Wetland Corridor typically will require an additional water

quality/detention basin. Since swales and intermittent drainages are located in the lower areas of a site, a water quality/detention basin is required on both sides of the wetland corridor. These water quality/drainage detention basins prevent uncontrolled storm runoff releases from entering the wetland preserve corridor and damaging the feature being preserved. Therefore the cost of the additional infrastructure to implement this alternative has been included in the cost impacts analysis.

As a result of having to construct and provide additional infrastructure to incorporate the extension of a wetland buffer corridor through this area of the Project the cost has increased by \$47,014,830, which equates to \$250,500 per acre. This increased cost of \$250,500 per acre would preclude the Project from providing a viable development. Attachment B provides land use and cost impacts associated with implementing this alternative. A conceptual land use plan showing the additional open space areas that would be necessary to accommodate the additional avoided wetlands and preserve areas are depicted in Figure 15. *Alternative 5a: Conceptual Land Use Plan Detail with Additional Avoidance Areas.*

Other Factors

This alternative places a wide wetland corridor through two of the most strategically located lots within the Plan Area Regional Commercial Lot 43 (Regional Mall Site) and General Commercial Lot 65. The alignment of the wetland corridor through the regional commercial site removes 17.2 acres from the site and isolates 9.4 acres from the rest of the lot. The isolated 9.4 acres of the regional commercial lot no longer fits into the Regional Mall Site criteria and would most likely become a general commercial land use effectively reducing the 110.8 acre site to 84.2 acres. The wetland corridor alignment through the general commercial lot removes 9.8 acres from the site and isolates 12.9 acres from the rest of the site.

The Regional Mall Site as proposed is 110.8 acres and is intended to be a Regional Mall. It has been situated within the Plan Area to provide significant Highway and arterial roadway frontage. Several Regional Mall developers were approached to determine the most efficient dimensions and site configuration to make the lot highly desirable so as to attract a Regional Mall developer to this location once the site becomes available for development. In addition to a site area of

approximately 110 acres, a lot with dimensions of approximately 1,800 to 2,100 feet deep by 2,200 to 2,500 feet wide is necessary so buildings can be efficiently placed with adequate separation to attract several major retailers and anchor tenants. In addition to the retail lot area and site dimensions, major arterial roadway access and frontage is also very critical to the success of developing a Regional Mall site. The proposed Regional Mall site is configured to provide 2,700 feet of Highway 50 frontage, major arterial street frontage along Scott Road of approximately 1,500 feet and along Easton Valley Parkway of approximately 2,700 feet. The main access points to the Regional Mall site are from Easton Valley Parkway, which would be disconnected from the Regional Mall Site under this alternative.

This alternative renders the regional commercial lot undevelopable by placing a wide wetland corridor through the site, reducing the main development area by 26.6 acres and eliminating all major arterial roadway frontage.

This alternative would put an inequitable amount of additional preservation requirements on the Carpenter Ranch property. The single family residential development area would be encumbered with an additional cost of \$102,281 per unit. The single family high density residential development area would be encumbered with an additional cost of \$54,827 per unit. The community commercial, regional commercial and general commercial site development cost would increase from \$12 per square foot to \$19 per square foot, would render the main economic engine of the project as undevelopable at these cost per square foot.

Environmental Impacts

This alternative would not result in a significant improvement in regards to impacts to wetlands and waters of the U.S., as impacts to waters of the U.S. are estimated at 36.311 acres (Table 8 below). This is only 3.188 acres less impact than the proposed project. This alternative would not significantly reduce impacts to Federally listed species or potential habitat. The additional wetlands and waters that would be avoided and the developable land that would be lost to accomplish the avoidance are presented in Figure 14.

Table 8 – Alternative 5a: Proposed Project with Additional Avoidance Areas

| <u>Jurisdictional Wetlands/Waters</u> | <u>Project</u> | | <u>Backbone</u> | <u>Interchange</u> | <u>Total</u> | <u>Total</u> | <u>Total</u> |
|---|----------------------|----------------------|----------------------|---------------------|----------------------|----------------------|----------------------|
| | <u>Avoided</u> | <u>Impact</u> | <u>Impact</u> | <u>Impact</u> | <u>Avoidance</u> | <u>Impact</u> | <u>Existing</u> |
| Vernal Pool | 1.776 | 2.246 | 0.606 | 0.014 | 1.776 | 2.866 | 4.642 |
| Seasonal Wetland | 0.789 | 3.133 | 0.736 | 0.000 | 0.789 | 3.869 | 4.657 |
| Seasonal Wetland Swale | 10.268 | 9.841 | 5.156 | 0.214 | 10.268 | 15.211 | 25.479 |
| Seep | 6.448 | 3.656 | 0.699 | 0.000 | 6.448 | 4.355 | 10.803 |
| Marsh | 0.142 | 0.056 | 0.012 | 0.000 | 0.142 | 0.069 | 0.211 |
| Creek/Channel | 14.342 | 1.204 | 1.031 | 0.610 | 14.342 | 2.845 | 17.187 |
| Intermittent Drainage | 7.252 | 2.591 | 1.847 | 0.027 | 7.252 | 4.465 | 11.716 |
| Ditch | 0.607 | 1.065 | 0.285 | 0.002 | 0.607 | 1.352 | 1.959 |
| Pond | 5.708 | 1.008 | 0.159 | 0.000 | 5.708 | 1.167 | 6.875 |
| Willow Scrub | <u>0.000</u> | <u>0.000</u> | <u>0.000</u> | <u>0.114</u> | <u>0.000</u> | <u>0.114</u> | <u>0.114</u> |
| Total | <u>47.332</u> | <u>24.799</u> | <u>10.531</u> | <u>0.982</u> | <u>47.332</u> | <u>36.311</u> | <u>83.643</u> |
| <u>Isolated/Non-Jurisdictional</u> | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Isolated Vernal Pool | 0.019 | 0.013 | 0.000 | 0.000 | 0.019 | 0.013 | 0.031 |
| Isolated Seasonal Wetland | 0.003 | 0.001 | 0.001 | 0.000 | 0.003 | 0.002 | 0.004 |
| Ditch/Canal (NJ) | 0.026 | 0.343 | 0.051 | 0.000 | 0.026 | 0.394 | 0.420 |
| Pond (NJ) | 0.000 | 0.846 | 0.000 | 0.000 | 0.000 | 0.846 | 0.846 |
| Total | <u>0.047</u> | <u>1.202</u> | <u>0.052</u> | <u>0.000</u> | <u>0.047</u> | <u>1.254</u> | <u>1.301</u> |
| Grand Total | <u>47.379</u> | <u>26.001</u> | <u>10.583</u> | <u>0.982</u> | <u>47.379</u> | <u>37.566</u> | <u>84.944</u> |

Summary

This alternative would result in the following affects on the project:

- It renders the main retail component of the project as undevelopable while impacts to wetlands and waters of the U.S. are reduced only 3.196 acres, while losing 53.2 acres of developable land and adding over \$51 million to the cost of development.
- The loss of 128 dwelling units and an additional cost of \$54,827 per single family high density, and \$102,281 per single family dwelling unit.
- The loss of 11.3 acres (and isolation of 12.9 acres) of General Commercial development – and an increase in cost of \$250,464 per acre.
- The loss of 17.2 acres (and isolation of 9.4 acres) of Regional Mall development – resulting in a poorly designed Mall that costs \$250,464 more an acre to implement.
- The City of Folsom and the land owners are planning a high quality mall with top tier major national retail tenants for the regional mall site as shown on the Specific Plan. In order to attract a premier mall developer, the site must meet certain standards or the site will not be purchased and developed. An onsite preserve for the drainage swale

will constrain the site to be economically infeasible and therefore, not viable as a regional mall site. As outlined in four separate letters from mall developers and commercial real estate firms (Attachment C), any one of the following constraints would deter a mall developer from developing this site. In total, the site would be unmarketable. Some of the key constraints are:

- o The mall itself would be cut off from the most important aspect of the site design, being oriented to the high traffic volume intersection of Scott Road and Easton Valley Road.
- o The internal road circulation is disrupted by the preserve area and numerous expensive bridge crossings would be required.
- o A drainage preserve area would eliminate a substantial area of parking requiring expensive parking garages in the first phase of development and restricting the ability of expanding the mall in the future.
- o The site must be 110 acres in total size in order to accommodate a regional mall. The preserve area reduces the size to 84 acres.
- o The site must have a depth of 1,800 to 2,100 feet in order to accommodate an internal ring road, outer building pads and queuing for traffic.

Alternative 5b – Proposed Project with Additional Avoidance of Seasonal Wetland Swale through Mall Site to Highway 50

Overview

This Alternative (Figure 16. *Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50*) involves the additional avoidance of approximately 6,500 linear feet of a seasonal wetland swale located in the northern midsection of the Folsom Plan Area. The swale traverses through lots 43, 52, 53 and 65. This alternative would provide an extension of an swale/channel that is currently proposed as preserved further west. The extension begins at a proposed detention basin adjacent to the large, contiguous preserve located in the northwest portion of the Plan Area and traverses through the development site upstream in a northeasterly direction to Placerville Road adjacent to Highway 50.

Project Purpose

The northern midsection of the Plan Area is the heart of the Proposed Project and is a vital component to the Project Purpose. This area must serve as the core of the retail and commercial components of the Plan Area due to its location adjacent to Highway 50, Oak Avenue Interchange and Easton Valley Parkway. Highway 50 and Scott Road provide the retail commercial and general commercial areas with freeway and major arterial roadway frontage while Easton Valley Parkway another major arterial provides the access connection to this commercial core area.

The extension of swale corridor impacts single family Lots 51, 52 and 53, Lot 43 regional commercial site (Mall Site) and Lot 65 a general commercial site. The developable area for this Alternative would be approximately 178.4 acres. This represents a total loss of 38.9 acres of development. Single family residential development would be reduced by 11.9 acres, the Mall Site would be reduced by 17.2 acres and the general commercial site would be reduced by 9.8 acres. In addition to the loss of 38.9 acres of developable land, 73 dwelling units and 316,507 square feet of commercial building area (all of which are located on the Carpenter Ranch property) would be lost under this Alternative.

Due to the location and alignment of the 150-foot wide wetland buffer corridor significant portions of Lot 43 and Lot 65 are cut-off and isolated from the main development area of each site. Also, due to the meandering nature of the swale, the wetland buffer corridor is wider than the minimum 150-foot width through a majority of Lots 43 and 65 further impacting these lots.

Logistics

In order to preserve these wetland features and provide a minimum distance of 75-feet of buffer from the feature, a 150-foot minimum width wetland buffer corridor needs to be incorporated into the land use plan for this area of the development. A wide wetland buffer corridor extended through this area of the Project requires revised street circulation and lotting patterns for three separate single family developments, and revised site plans for the regional commercial and general commercial lots.

The extension of the wetland buffer corridor would also require significant changes to the Project's backbone infrastructure. Three major roadway bridges and one secondary roadway bridge are required to be constructed over the swale corridor plus six separate backbone utility crossings would need to be bored and jacked under the wetland corridor. A water quality/detention basin would need to be relocated and an additional water quality/detention basin would need to be incorporated into the storm drainage backbone infrastructure

Revised lotting patterns for single family lots 51, 52 and 53 to accommodate the extension of the wetland buffer corridor and required water quality /detention basins, would result in the loss of 73 Dwelling Units.

Due to the location and alignment of the 150-foot wide wetland corridor significant portions of the Regional Commercial and General Commercial (Lot 43 and Lot 65) are cut-off and isolated from the main development area of each site. Five on-site street crossings and three pedestrian crossings are necessary to provide access to the remaining development area of each lot. Also, five separate on-site utility crossings will need to be bored and jacked under the wetland corridor. In order to make up for lost retail parking due to the wetland buffer corridor, two parking structures would need to be incorporated into the Mall Site.

The extension of the wetland buffer corridor would also require some temporary disturbance of the wetland swale to allow for the construction of the nine (9) street crossings and three (3) pedestrian crossings. The street crossing would be a free span crossing over the swale so the integrity of the avoided feature can be maintained as much as possible in its current natural state.

Costs Impact Analysis

In order to quantify the cost impacts of implementing this alternative an estimate was prepared that compares the site development cost of the Proposed Project and this Alternative. The unit prices from the Preliminary Cost Estimate, Folsom Plan Area, Proposed Project Estimate dated January 30, 2009 were utilized for the cost impacts analysis.

The cost impacts analysis is divided into three sections. One section identifies the cost impacts due to the loss of land use efficiency. The most efficient single family lotting pattern is a grid system of lots and streets. Incorporating a corridor through a single family site reduces the efficiency of the grid lotting pattern and reduces the number of units that can be yielded per acre.

Another section of the cost impacts analysis quantifies the Project Specific One-Time Cost Burdens. The size and cost of the backbone infrastructure improvements (such as water treatment plants, regional sanitary sewer pump stations, drainage detention basins, freeway interchanges, arterial and collector roadways) do not change due to the loss of single family units and commercial area therefore these cost are spread over fewer lots. The cost for required public facilities and services do change due to the loss of single family units since the population is reduced that require these types of facilities. The public facilities and services such as fire and police personnel, stations and equipment, libraries, community centers and similar public amenities are reduced due to the smaller population within the Plan Area and have also been included in the cost impacts analysis.

The third section of the cost impacts analysis identifies the additional cost of on-site and off-site infrastructure improvements that would be required under this Alternative. Additional off-site improvements such as bridges, boring and jacking of utilities under the wetland buffer corridor and additional storm drainage water quality/detention basins are also quantified. Dividing a development area with a Wetland Preserve Corridor typically will require an additional water quality/detention basin. Since intermittent drainages are located in the lower areas of a site, a water quality/detention basin is required on both sides of the wetland preserve corridor. These water quality/drainage detention basins prevent uncontrolled storm runoff releases from entering the wetland preserve corridor and damaging the feature being preserved. Therefore the cost of the additional infrastructure to implement this Alternative has been included in the cost impacts analysis.

As a result of having to construct and provide additional infrastructure to incorporate the extension of a wetland swale corridor through this area of the Project, the total cost increased by over \$42,267,980 million. This increased cost equates to \$362,720 per acre and would

preclude the project from successful implementation. Attachment B provides land use and cost impacts associated with implementing this alternative. Conceptual single-family lotting and additional open space areas that would be necessary to accommodate the additional avoided wetlands and preserve areas are shown in Figure 17. *Alternative 5b: Conceptual Land Use Plan Detail – Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50*. Alternative 5b would result in significant fragmentation of the Regional Mall Site and General Commercial Sites as evident in Figure 18. *Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50 - Detail*.

Other Factors

This alternative places a wide wetland corridor through two of the most strategically located lots within the Plan Area. The alignment of the wetland corridor through the retail commercial site removes 17.2 acres from the site and isolates 9.4 acres from the rest of the lot. The isolated 9.4 acres of the regional commercial lot no longer fits into the regional Mall Site criteria and would become a general commercial land use effectively reducing the 110.8 acre site to 84.2 acres. The wetland corridor alignment through the general commercial lot removes 9.8 acres from the site and isolates 12.9 acres from the rest of the site.

The Mall Site as proposed is 110.8 acres and is intended to be a Regional Mall. It has been situated within the Plan Area to provide Highway and arterial roadway frontage that is required for a successful Mall development. Several Regional Mall developers were approached to determine the most efficient dimensions and site configuration to make the lot highly desirable so as to attract a Regional Mall developer to this location once the site becomes available for development. In addition to a site area of approximately 110 acres, the configuration of the site is critical for mall design/layout. A lot with dimensions of approximately 1,800 to 2,100 feet deep and approximately 2,200 to 2,500 feet wide is necessary so buildings can be efficiently placed with adequate separation to attract several major retailers and anchor tenants. In addition to the retail lot area and site dimensions, major arterial roadway access and frontage is also critical to the success of developing a regional mall site. The proposed Regional Mall site is configured to provide 2,700 feet of Highway 50 frontage, major arterial street frontage along Scott Road of approximately 1,500 feet and along Easton Valley Parkway of approximately

2,700 feet. The main access points to the Regional Mall are site from Easton Valley Parkway on the South, which would be disconnected from the Mall under this Alternative.

This alternative renders the regional commercial lot undevelopable by placing a wide wetland corridor through the site, reducing the main development area by 26.6 acres and eliminating the major arterial roadway frontage.

This alternative would put an inequitable amount of preservation requirements on the Carpenter Ranch project. The single family high density residential Lot 51, 52 and 53 would be encumbered with an additional cost of \$71,711 per unit and the regional commercial and general commercial lots site development cost would increase from \$13 per square foot to \$22 per square foot and would render the main economic engine of the project as undevelopable.

Environmental Impacts

This alternative would not result in a significant improvement in regards to impacts to wetlands and waters of the U.S., as impacts to waters of the U.S. are estimated at 36.622 acres (Table 9 below). This is only 2.877 acres less impact than the proposed project. This alternative would not significantly reduce impacts to Federally listed species or potential habitat. The additional wetlands and waters that would be avoided and the developable land that would be lost to accomplish the avoidance are presented in Figure 16.

Table 9 – Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50

| Jurisdictional Wetlands/Waters | Project | | Backbone | Interchange | Total | Total | Total |
|---------------------------------------|----------------|---------------|-----------------|--------------------|------------------|---------------|-----------------|
| | Avoided | Impact | Impact | Impact | Avoidance | Impact | Existing |
| Vernal Pool | 1.728 | 2.293 | 0.606 | 0.014 | 1.728 | 2.914 | 4.642 |
| Seasonal Wetland | 0.784 | 3.138 | 0.736 | 0.000 | 0.784 | 3.873 | 4.657 |
| Seasonal Wetland Swale | 10.185 | 9.924 | 5.156 | 0.214 | 10.185 | 15.294 | 25.479 |
| Seep | 6.441 | 3.662 | 0.699 | 0.000 | 6.441 | 4.361 | 10.803 |
| Marsh | 0.142 | 0.056 | 0.012 | 0.000 | 0.142 | 0.069 | 0.211 |
| Creek/Channel | 14.213 | 1.333 | 1.031 | 0.610 | 14.213 | 2.974 | 17.187 |
| Intermittent Drainage | 7.252 | 2.591 | 1.847 | 0.027 | 7.252 | 4.465 | 11.716 |
| Ditch | 0.568 | 1.105 | 0.285 | 0.002 | 0.568 | 1.391 | 1.959 |
| Pond | 5.708 | 1.008 | 0.159 | 0.000 | 5.708 | 1.167 | 6.875 |
| Willow Scrub | 0.000 | 0.000 | 0.000 | 0.114 | 0.000 | 0.114 | 0.114 |
| Total: | 47.021 | 25.109 | 10.531 | 0.982 | 47.021 | 36.622 | 83.643 |
| Isolated/Non-Jurisdictional | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Isolated Vernal Pool | 0.019 | 0.013 | 0.000 | 0.000 | 0.019 | 0.013 | 0.031 |
| Isolated Seasonal Wetland | 0.003 | 0.001 | 0.001 | 0.000 | 0.003 | 0.002 | 0.004 |
| Ditch/Canal (NJ) | 0.026 | 0.343 | 0.051 | 0.000 | 0.026 | 0.394 | 0.420 |
| Pond (NJ) | 0.000 | 0.846 | 0.000 | 0.000 | 0.000 | 0.846 | 0.846 |
| Total: | 0.047 | 1.202 | 0.000 | 0.000 | 0.047 | 1.254 | 1.301 |
| Grand Total: | 47.068 | 26.312 | 10.583 | 0.982 | 47.068 | 37.876 | 84.944 |

Summary

This alternative would result in the following affects on the project:

- It renders the main retail component of the project as undevelopable while impacts to wetlands and waters of the U.S. are reduced only 2.877 acres while losing 38.9 acres of developable land and adding over \$42 million to the cost of development.
- The loss of 73 dwelling units and an additional cost of \$71,711 per dwelling unit.
- The loss of 9.8 acres (and isolation of 12.9 acres) of General Commercial development – and an increase in cost of \$362,720 per acre.
- The loss of 17.2 acres (and isolation of 9.4 acres) of Regional Mall development – resulting in a poorly designed Mall that costs \$362,720 more an acre to implement.
- The City of Folsom and the land owners are planning a high quality mall with top tier major national retail tenants for the regional mall site as shown on the Specific Plan. In order to attract a premier mall developer, the site must meet certain standards or the site will not be purchased and developed. An onsite preserve for the drainage swale will constrain the site to be economically infeasible and therefore, not viable as a regional mall site. As outlined in four separate letters from mall developers and

commercial real estate firms (See Attachment C), any one of the following constraints would deter a mall developer from developing this site. In total, the site would be unmarketable. Some of the key constraints are:

- o The mall itself would be cut off from the most important aspect of the site design, being oriented to the high traffic volume intersection of Scott Road and Easton Valley Road.
- o The internal road circulation is disrupted by the preserve area and numerous expensive bridge crossings would be required.
- o A drainage preserve area would eliminate a substantial area of parking requiring expensive parking garages in the first phase of development and restricting the ability of expanding the mall in the future.
- o The site must be 110 acres in total size in order to accommodate a regional mall. The preserve area reduces the size to 84 acres.
- o The site must have a depth of 1,800 to 2,100 feet in order to accommodate an internal ring road, outer building pads and queuing for traffic.

Alternative 5c – Proposed Project with Additional Avoidance of Seasonal Wetland Swale through Mall Site to Scott Road

Overview

Alternative 5c (Figure 19. *Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road*) involves the additional avoidance of approximately 6,500 linear feet of a seasonal wetland swale located in the northern midsection of the Folsom Plan Area. The swale traverses through lots 43, 52 and 53. This alternative would provide an extension of an swale/channel that is currently proposed as preserved further west. The extension begins at a proposed detention basin adjacent to the large, contiguous preserve located in the northwest portion of the Plan Area and traverses through the development site upstream in a northeasterly direction to Scott Road.

Project Purpose

The northern midsection of the Plan Area is the heart of the Proposed Project and is a vital component to the Project Purpose. This area must serve as the core of the retail and commercial components of the Plan Area due to its location adjacent to Highway 50, Oak Avenue Interchange and Easton Valley Parkway. Highway 50 and Oak Avenue provide the retail commercial and general commercial areas with freeway and major arterial roadway frontage while Easton Valley Parkway another major arterial provides the access connection to this commercial core area.

The extension of swale corridor impacts single family Lots 51, 52, 53 and Lot 43 regional commercial site (Regional Mall Site). The developable area for this Alternative would be approximately 159.4 acres. This represents a total loss of 29.1 acres of development. Single family residential development would be reduced by 11.9 acres, the Regional Mall Site would be reduced by 17.2 acres. In addition to the loss of 29.1 acres of developable land, 73 dwelling units and 209,785 square feet of retail commercial building area (all of which are located on the Carpenter Ranch property) would be lost under this Alternative.

Due to the location and alignment of the 150-foot wide wetland buffer corridor significant portions of Lot 43 are cut-off and isolated from the main development area of the site. Also, due to the meandering nature of the seasonal swale the wetland buffer corridor is wider than the minimum 150-foot width through a majority of Lot 43 further impacting these lots.

Logistics

In order to preserve these wetland features and provide a minimum distance of 75-feet of buffer from the feature, a 150-foot minimum width wetland buffer corridor needs to be incorporated into the land use plan for this area of the development. A wide wetland buffer corridor extended through this area of the Project requires revised street circulation and lotting patterns for three separate single family developments, and revised site plans for the regional commercial and general commercial lots.

The extension of the wetland buffer corridor would also require significant changes to the Project's backbone infrastructure. One major roadway bridge and one secondary roadway bridge are required to be constructed over the wetland corridor plus four separate backbone utility crossings would need to be bored and jacked under the wetland corridor. A water quality/detention basin would need to be relocated and an additional water quality/detention basin would need to be incorporated into the storm drainage backbone infrastructure

Revised lotting patterns for single family lots 51, 52 and 53 to accommodate the extension of the wetland buffer corridor and required water quality /detention basins, would result in the loss of 73 Dwelling Units.

Due to the location and alignment of the 150-foot wide wetland corridor significant portions of the Regional Commercial development (Lot 43) are cut-off and isolated from the main development area of the site. Two on-site street crossings and three pedestrian crossings are necessary to provide access to the remaining development area of the lot. In order to make up for lost retail parking due to the wetland buffer corridor, two parking structures would also need to be incorporated into the Mall Site.

The extension of the wetland buffer corridor would also require some temporary disturbance of the wetland swale to allow for the construction of the four (4) street crossings and three (3) pedestrian crossings. The street crossing would be a free span crossing over the swale so the integrity of the avoided feature can be maintained as much as possible in its current natural state.

Costs Impact Analysis

In order to quantify the cost impacts of implementing this alternative an estimate was prepared that compares the site development cost of the Proposed Project and this Alternative. The unit prices from the Preliminary Cost Estimate, Folsom Plan Area, Proposed Project Estimate dated January 30, 2009 were utilized for the cost impacts analysis.

The cost impacts analysis is divided into three sections. One section identifies the cost impacts due to the loss of land use efficiency. The most efficient single family lotting pattern is a grid system of lots and streets. Incorporating a corridor through a single family site reduces the efficiency of the grid lotting pattern and reduces the number of units that can be yielded per acre.

Another section of the cost impacts analysis quantifies the Project Specific One-Time Cost Burdens. The size and cost of the backbone infrastructure improvements (such as water treatment plants, regional sanitary sewer pump stations, drainage detention basins, freeway interchanges, arterial and collector roadways) do not change due to the loss of single family units and commercial area therefore these cost are spread over fewer lots. The cost for required public facilities and services do change due to the loss of single family units since the population is reduced that require these types of facilities. The public facilities and services such as fire and police personnel, stations and equipment, libraries, community centers and similar public amenities are reduced due to the smaller population within the Plan Area and have also been included in the cost impacts analysis.

The third section of the cost impacts analysis identifies the additional cost of on-site and off-site infrastructure improvements that would be required under this Alternative. Additional off-site improvements such as bridges, boring and jacking of utilities under the wetland buffer corridor and additional storm drainage water quality/detention basins are also quantified. Dividing a development area with a Wetland Preserve Corridor typically will require an additional water quality/detention basin. Since intermittent drainages are located in the lower areas of a site, a water quality/detention basin is required on both sides of the wetland preserve corridor. These water quality/drainage detention basins prevent uncontrolled storm runoff releases from entering the wetland preserve corridor and damaging the feature being preserved. Therefore the cost of the additional infrastructure to implement this Alternative has been included in the cost impacts analysis.

As a result of having to construct and provide additional infrastructure to incorporate the extension of a wetland swale corridor through this area of the Project, the total cost increased by over \$29.5 million. This increased cost equates to \$355,383 per acre and would preclude

the project from successful implementation. Attachment B provides land use and cost impacts associated with implementing this alternative. Alternative 5c presents conceptual single-family lotting and additional open space areas that would be necessary to accommodate the additional avoided wetlands and preserve areas (Figure 20. *Alternative 5c: Conceptual Land Use Plan Detail – Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road*). Alternative 5c would result in significant fragmentation of the Regional Mall and General Commercial Sites and causing a significant reduction in the number of dwelling units in the Single Family Lots as evident in Figure 21. *Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through mall Site to Scott Road - Detail*.

Other Factors

This alternative places a wide wetland corridor through two of the most strategically located lots within the Plan Area. The alignment of the wetland corridor through the retail commercial site removes 17.2 acres from the site and isolates 9.4 acres from the rest of the lot. The isolated 9.4 acres of the regional commercial lot no longer fits into the regional Mall Site criteria and would become a general commercial land use effectively reducing the 110.8 acre site to 84.2 acres.

The Mall Site as proposed is 110.8 acres and is intended to be a Regional Mall. It has been situated within the Plan Area to provide Highway and arterial roadway frontage that is required for a successful Mall development. Several Regional Mall developers were approached to determine the most efficient dimensions and site configuration to make the lot highly desirable so as to attract a Regional Mall developer to this location once the site becomes available for development. In addition to a site area of approximately 110 acres, the configuration of the site is critical for mall design/layout. A lot with dimensions of approximately 1,800 to 2,100 feet deep and approximately 2,200 to 2,500 feet wide is necessary so buildings can be efficiently placed with adequate separation to attract several major retailers and anchor tenants. In addition to the retail lot area and site dimensions, major arterial roadway access and frontage is also critical to the success of developing a regional mall site. The proposed Regional Mall site is configured to provide 2,700 feet of Highway 50 frontage, major arterial street frontage along Oak Avenue of approximately 1,500 feet and along Easton Valley Parkway of approximately

2,700 feet. The main access points to the Regional Mall are site from Easton Valley Parkway on the South, which would be disconnected from the Mall under this Alternative.

This alternative renders the regional commercial lot undevelopable by placing a wide wetland corridor through the site, reducing the main development area by 26.6 acres and eliminating the major arterial roadway frontage.

This alternative would also put an inequitable amount of preservation requirements on the Carpenter Ranch project. The single family residential Lot 51, 52 and 53 would be encumbered with an additional cost of \$70,297 per unit and the regional commercial lot site development cost would increase from \$13 per square foot to \$21 per square foot and would render the main economic engine of the project as undevelopable.

Environmental Impacts

This alternative would not result in a significant improvement in regards to impacts to wetlands and waters of the U.S., as impacts to waters of the U.S. are estimated at 37.003 acres (Table 10 below). This is only 2.496 acres less impact than the proposed project. This alternative would not significantly reduce impacts to Federally listed species or potential habitat. The additional wetlands and waters that would be avoided and the developable land that would be lost to accomplish the avoidance are presented in Figure 19.

| Table 10 – Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road | | | | | | | |
|--|----------------|---------------|-----------------|--------------------|------------------|---------------|-----------------|
| Jurisdictional Wetlands/Waters | Project | | Backbone | Interchange | Total | Total | Total |
| | Avoided | Impact | Impact | Impact | Avoidance | Impact | Existing |
| Vernal Pool | 1.728 | 2.293 | 0.606 | 0.014 | 1.728 | 2.914 | 4.642 |
| Seasonal Wetland | 0.784 | 3.138 | 0.736 | 0.000 | 0.784 | 3.873 | 4.657 |
| Seasonal Wetland Swale | 10.166 | 9.943 | 5.156 | 0.214 | 10.166 | 15.313 | 25.479 |
| Seep | 6.325 | 3.778 | 0.699 | 0.000 | 6.325 | 4.478 | 10.803 |
| Marsh | 0.142 | 0.056 | 0.012 | 0.000 | 0.142 | 0.069 | 0.211 |
| Creek/Channel | 13.967 | 1.579 | 1.031 | 0.610 | 13.967 | 3.220 | 17.187 |
| Intermittent Drainage | 7.252 | 2.591 | 1.847 | 0.027 | 7.252 | 4.465 | 11.716 |
| Ditch | 0.568 | 1.105 | 0.285 | 0.002 | 0.568 | 1.391 | 1.959 |
| Pond | 5.708 | 1.008 | 0.159 | 0.000 | 5.708 | 1.167 | 6.875 |
| Willow Scrub | 0.000 | 0.000 | 0.000 | 0.114 | 0.000 | 0.114 | 0.114 |
| Total: | 46.640 | 25.490 | 10.531 | 0.982 | 46.640 | 37.003 | 83.643 |
| Isolated/Non-Jurisdictional | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Isolated Vernal Pool | 0.019 | 0.013 | 0.000 | 0.000 | 0.019 | 0.013 | 0.031 |
| Isolated Seasonal Wetland | 0.003 | 0.001 | 0.001 | 0.000 | 0.003 | 0.002 | 0.004 |
| Ditch/Canal (NJ) | 0.026 | 0.343 | 0.051 | 0.000 | 0.026 | 0.394 | 0.420 |
| Pond (NJ) | 0.000 | 0.846 | 0.000 | 0.000 | 0.000 | 0.846 | 0.846 |
| Total: | 0.047 | 1.202 | 0.000 | 0.000 | 0.047 | 1.254 | 1.301 |
| Grand Total: | 46.687 | 26.693 | 10.583 | 0.982 | 46.687 | 38.257 | 84.944 |

Summary

This alternative would result in the following affects on the project:

- It renders the main retail component of the project as undevelopable while impacts to wetlands and waters of the U.S. are reduced only 2.496 acres while losing 29.1 acres of developable land and adding over \$29.5 million to the cost of development.
- The loss of 73 dwelling units and an additional cost of \$70,297 per dwelling unit.
- The loss of 17.2 acres of Regional Mall development – resulting in a poorly designed Mall that costs \$355,383 more an acre to implement.
- The City of Folsom and the land owners are planning a high quality mall with top tier major national retail tenants for the regional mall site as shown on the Specific Plan. In order to attract a premier mall developer, the site must meet certain standards or the site will not be purchased and developed. An onsite preserve for the drainage swale will constrain the site to be economically infeasible and therefore, not viable as a regional mall site. As outlined in four separate letters from mall developers and commercial real estate firms (See Attachment C), any one of the

following constraints would deter a mall developer from developing this site. In total, the site would be unmarketable. Some of the key constraints are:

- o The mall itself would be cut off from the most important aspect of the site design, being oriented to the high traffic volume intersection of Scott Road and Easton Valley Road
- o The internal road circulation is disrupted by the preserve area and numerous expensive bridge crossings would be required.
- o A drainage preserve area would eliminate a substantial area of parking requiring expensive parking garages in the first phase of development and restricting the ability of expanding the mall in the future.
- o The site must be 110 acres in total size in order to accommodate a regional mall. The preserve area reduces the size to 84 acres.
- o The site must have a depth of 1,800 to 2,100 feet in order to accommodate an internal ring road, outer building pads and queuing for traffic.

Alternative 5d – Proposed Project with Additional Avoidance of Intermittent Drainage on Lot 39 (Carpenter Ranch)

Overview

This alternative (Figure 22. *Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch*) involves the additional avoidance of approximately 2,600 linear feet of intermittent drainage and portions of a man-made ditch that is approximately 6,500 linear feet in the southern portion of Lot 39 of the Carpenter Ranch development. The intermittent drainage is located on the eastern side of a large oak woodland preserve and traverses the site from the southeast corner (from under the powerline easement) to the northwest, connecting with the proposed open space area. The man-made ditch enters the site from the mid-point of the eastern Lot 39 boundary and traverse the site following the terrain contours through the development and around the northern and western perimeter of the same oak woodland preserve and exits the site near the southwestern corner of Lot 39. The majority of the segment of the man-made ditch that is within the oak

woodland preserve is avoided with the Proposed Project site development however its continuity is not maintained upstream, downstream or through the site.

Project Purpose

The Lot 39 development is a single family estate-type of land use. This type of land use typically has larger lots and improvement amenities such as gated entry, upscale landscape features, decorative street lights and street signs. The Developable Area for this Alternative would be approximately 97.9 acres. This represents a loss of 14.3 acres of residential development and the loss of 55 dwelling units (all of which are located on the Carpenter Ranch property).

Logistics

In order to preserve these wetland features and provide a minimum distance of 75-feet of buffer from the feature, a minimum width, 150-foot wetland buffer corridor needs to be incorporated into the single family development. The incorporation of a 150-foot wide wetland buffer corridor into the development area requires a revised street circulation and lotting pattern. Due to the location and alignment of the 150-foot wide wetland corridor a significant portion of Lot 39 is cut-off and isolated from the main development area. A revised street circulation and lotting design requires some temporary disturbance of the wetland feature to allow for the construction of a street crossing over the feature. A wetland buffer corridor street crossing is necessary to maintain access to the isolated area of the development. The street crossing would be a free span crossing over the wetland feature so the integrity of the avoided feature can be maintained as much as possible in its current natural state.

An additional street access (and impacts to the open space) would be necessary to allow for a street connection to Oak Avenue Parkway to the east. This street connection is required by City Ordinance to provide a second emergency vehicle access point to the isolated area of the development as well as a second access point for the residents. Residential areas require at least two points of access to a development area for emergency vehicle and evacuation routes.

Due to the hilly terrain of Lot 39 this alternative would result in the creation of an isolated portion of the development. A sanitary sewer pump station and force main would be required to provide sewer service to this portion of the development that would not be necessary under the Proposed Project. Not only are pump stations more costly, but gravity-flow sewer systems are preferred to minimize system failures and potentially significant environmental impacts that may result from a pump system failure.

Costs Impact Analysis

In order to quantify the cost impacts of implementing this alternative an estimate was prepared that compares the site development cost of the Proposed Project and the Wetland Preserve Project. The unit prices from the Preliminary Cost Estimate, Folsom Plan Area, Proposed Project Estimate dated January 30, 2009 were utilized for the cost impacts analysis.

The cost impacts analysis is divided into three sections. One section identifies the cost impacts due to the loss of land use efficiency. The most efficient single family lotting pattern is a grid system of lots and streets. Incorporating a corridor through a single family site reduces the efficiency of the grid lotting pattern and reduces the number of units that can be yielded per acre.

Another section of the cost impacts analysis quantifies the Project Specific One-Time Cost Burdens. The cost of the backbone infrastructure such as water treatment plants, regional sanitary sewer pump stations, drainage detention basins, freeway interchanges, arterial and collector roadways do not change in size and cost due to the loss of single family units therefore these cost are spread over fewer lots. The cost for required public facilities and services do change due to the loss of single family units since the population is reduced that require these types of facilities. The public facilities and services such as fire and police personnel, stations and equipment, libraries, community centers and similar public amenities are reduced due to the smaller population within the Plan Area and have also been included in the cost impacts analysis.

The third section of the cost impacts analysis identifies the additional cost of on-site and off-site infrastructure improvements that would be required under the Wetland Preserve Project Alternative. Additional off-site improvements such as bridges, boring and jacking of utilities under the wetland buffer corridor and additional storm drainage water quality/detention basins are also quantified. Dividing a development area with a Wetland Preserve Corridor typically will require an additional water quality/detention basin. Since intermittent drainages are located in the lower areas of a site, a water quality/detention basin is required on both sides of the wetland preserve corridor. These water quality/drainage detention basins prevent uncontrolled storm runoff releases from entering the wetland preserve corridor and damaging the feature being preserved. Therefore the cost of the additional infrastructure to implement the Wetland Preserve Project has been included in the cost impacts analysis.

As a result of not having to construct and provide infrastructure for 55 single family dwelling units, the total site development costs for the Wetland Preserve Project are lower than the Proposed Project. However, the cost per single family unit is increased by \$22,310 due to spreading the total site development cost over fewer lots. Attachment B provides land use and cost impacts associated with implementing this alternative. A conceptual lotting plan and additional open space areas that would be necessary to accommodate the additional avoided wetlands and preserve areas are depicted in Figure 23. *Alternative 5d: Conceptual Land Use Plan Detail – Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch*. It should also be noted that the conceptual plan does not include single-loaded roads adjacent to the newly created open space area created by this Alternative as is typically requested/required by the Corps and other regulatory agencies. Providing single-loaded road would only add to the cost and reduce the number of dwelling units on the parcel.

Other Factors

This alternative would put an inequitable amount of preservation requirements on the Carpenter Ranch project. The residential village in Lot 39 would be encumbered with an additional cost of \$22,310 per unit.

Environmental Impacts

This alternative would result in an insignificant reduction of impacts to waters of the U.S., as impacts to waters of the U.S. are estimated at 39.189 acres (Table 11 below). This represents a reduction in impacts of only 0.311 acres. This alternative would also not significantly reduce impacts to Federally listed species or potential habitat.

Table 11 – Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch

| Jurisdictional Wetlands/Waters | Project | | Backbone | Interchange | Total | Total | Total |
|------------------------------------|---------------|---------------|---------------|--------------|---------------|---------------|---------------|
| | Avoided | Impact | Impact | Impact | Avoidance | Impact | Existing |
| Vernal Pool | 1.771 | 2.242 | 0.615 | 0.014 | 1.771 | 2.872 | 4.642 |
| Seasonal Wetland | 0.789 | 3.133 | 0.736 | 0.000 | 0.789 | 3.869 | 4.657 |
| Seasonal Wetland Swale | 7.931 | 11.438 | 5.897 | 0.214 | 7.931 | 17.548 | 25.479 |
| Seep | 6.332 | 3.772 | 0.699 | 0.000 | 6.332 | 4.471 | 10.803 |
| Marsh | 0.142 | 0.056 | 0.012 | 0.000 | 0.142 | 0.069 | 0.211 |
| Creek/Channel | 13.938 | 1.450 | 1.189 | 0.610 | 13.938 | 3.250 | 17.187 |
| Intermittent Drainage | 7.252 | 2.591 | 1.847 | 0.027 | 7.252 | 4.465 | 11.716 |
| Ditch | 0.593 | 1.059 | 0.304 | 0.002 | 0.593 | 1.366 | 1.959 |
| Pond | 5.708 | 1.008 | 0.159 | 0.000 | 5.708 | 1.167 | 6.875 |
| Willow Scrub | 0.000 | 0.000 | 0.000 | 0.114 | 0.000 | 0.114 | 0.114 |
| Total: | 44.454 | 26.749 | 11.458 | 0.982 | 44.454 | 39.189 | 83.643 |
| Isolated/Non-Jurisdictional | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Isolated Vernal Pool | 0.019 | 0.013 | 0.000 | 0.000 | 0.019 | 0.013 | 0.031 |
| Isolated Seasonal Wetland | 0.003 | 0.001 | 0.001 | 0.000 | 0.003 | 0.002 | 0.004 |
| Ditch/Canal (NJ) | 0.026 | 0.343 | 0.051 | 0.000 | 0.026 | 0.394 | 0.420 |
| Pond (NJ) | 0.000 | 0.846 | 0.000 | 0.000 | 0.000 | 0.846 | 0.846 |
| Total: | 0.047 | 1.202 | 0.000 | 0.000 | 0.047 | 1.254 | 1.301 |
| Grand Total: | 44.501 | 27.951 | 11.511 | 0.982 | 44.501 | 40.443 | 84.944 |

Waters of the U.S. that would be avoided under this alternative are intermittent drainages (typically 1-3 feet in width) and a man-made ditch, both of which have sparse vegetation. Attachment D provides additional information on the characteristics of these waters. The additional wetlands and waters that would be avoided along with the developable land that would be lost to accomplish the avoidance are presented in Figure 24. *Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch - Detail.*

Summary

This alternative would result in the following affects on the project:

- Reduction in impacts to wetlands and waters of the U.S. is insignificant - reduced by only 0.319 acres of intermittent drainage.
- The alternative would cause the loss of 14.3 acres of developable land, and add \$22,310 to the cost of each single family dwelling unit.
- The loss of 55 dwelling units and increased costs in infrastructure costs to accommodate the open space required to buffer the 0.319 acres of intermittent drainage that would be avoided.
- The alternative results in an inequitable amount of additional preservation requirements on the Carpenter Ranch property.

Although, the avoided on-site segment of the man-made ditch for the most part will not be disturbed by the site development, the project will cause some fragmentation of this feature and other intermittent drainages on the site. These features will be considered indirectly impacted and appropriate mitigation will be provided.

SUMMARY/CONCLUSION

See below, Table 12 – *Assessment of On-Site Alternative for Folsom Specific Plan Area*, which summarizes the Alternatives. Only one Alternatives results in significant reduction to impacts to waters of the U.S. (Alternative 3 - Resource Impact Minimization) but this alternative does not meet the Project Purpose, Cost, or Balanced Affect criteria.

| <u>Design Alternative</u> | <u>Project Purpose</u> | <u>Cost</u> | <u>Logistics</u> | <u>Balanced Effect</u> | <u>Environmental (Waters)</u> | <u>Environmental (Species)</u> |
|---------------------------|------------------------|-------------|------------------|------------------------|-------------------------------|--------------------------------|
| Alternative 1 | NO | NO | NO | YES | YES | NO |
| Alternative 2 | NO | YES | YES | NO | NO | NO |
| Alternative 3 | NO | NO | YES | NO | YES | NO |
| Alternative 4 | YES | YES | YES | NO | NO | NO |
| Alternative 5 | YES | PROJECT | YES | YES | PROJECT | PROJECT |
| Alternative 5a | NO | NO | YES | NO | NO | NO |
| Alternative 5b | NO | NO | YES | NO | NO | NO |
| Alternative 5c | NO | NO | YES | NO | NO | NO |
| Alternative 5d | YES | NO | YES | NO | NO | NO |
| Alternative 5e | YES | NO | YES | NO | NO | NO |

LIST OF FIGURES

- Figure 1. Project Site and Vicinity
- Figure 2. Folsom Plan Area Components
- Figure 3. Folsom Plan Area Specific Plan Location and the Folsom General Plan
- Figure 4. Proposed Project Land Use Plan
- Figure 5. Natural Resources Conservation Service Soils Types
- Figure 6. USGS Watersheds
- Figure 7. Wetland Delineation
- Figure 8. Proposed Project - Avoidance/Impact
- Figure 9. Alternative 1: No Federal Action
- Figure 10. Alternative 2: Centralized Development
- Figure 11. Alternative 3: Resource Impact Minimization
- Figure 12. Alternative 4: Reduced Hillside Development
- Figure 13. Alternative 5: Proposed Project
- Figure 14. Alternative 5a: Proposed Project with Additional Avoidance Areas
- Figure 15. Alternative 5a: Proposed Project Land Use Plan with Additional Avoidance Areas
- Figure 16. Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50
- Figure 17. Alternative 5b: Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50
- Figure 18. Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50 - Detail
- Figure 19. Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
- Figure 20. Alternative 5c: Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
- Figure 21. Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road - Detail
- Figure 22. Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch
- Figure 23. Alternative 5d: Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch
- Figure 24. Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch - Detail

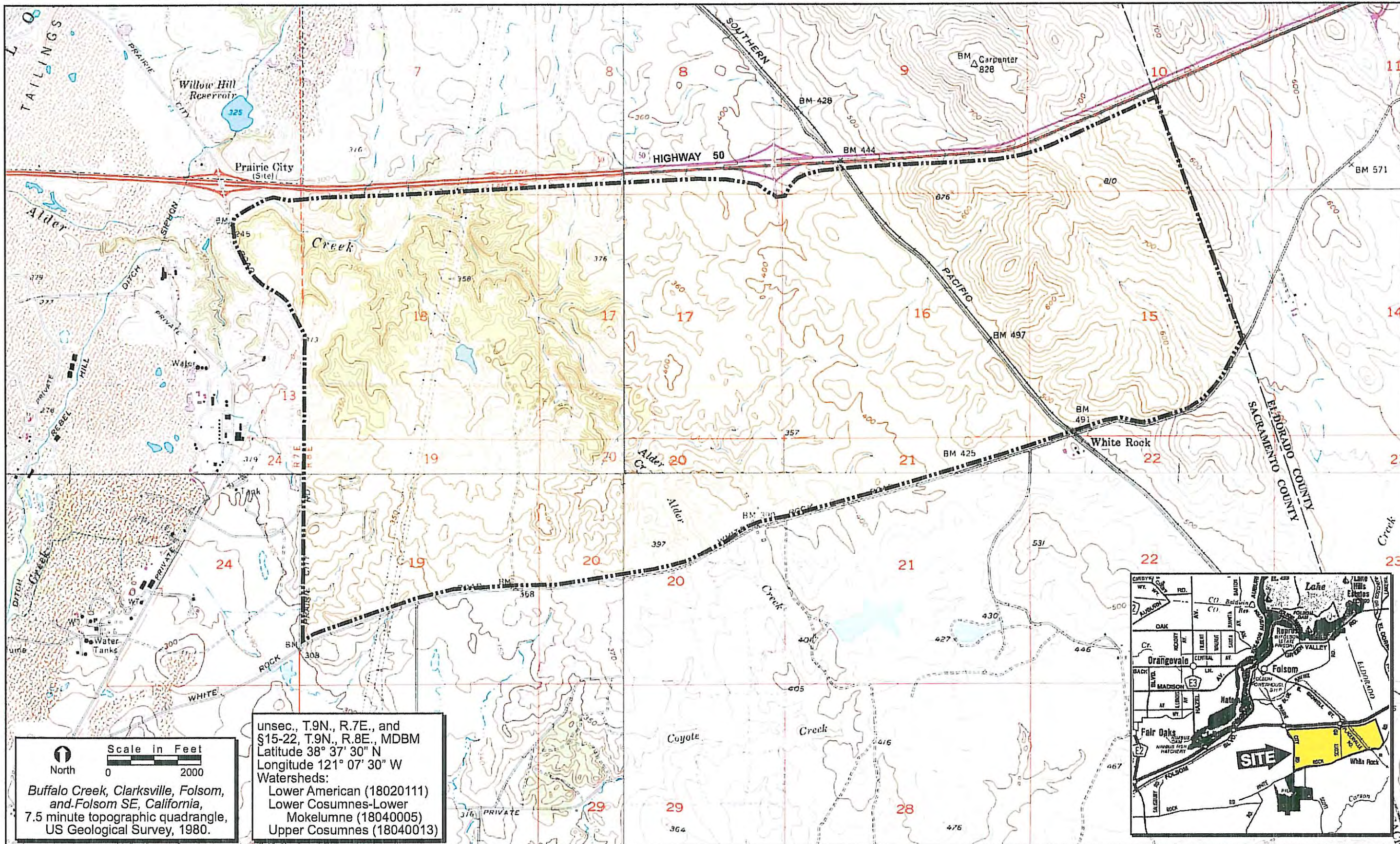
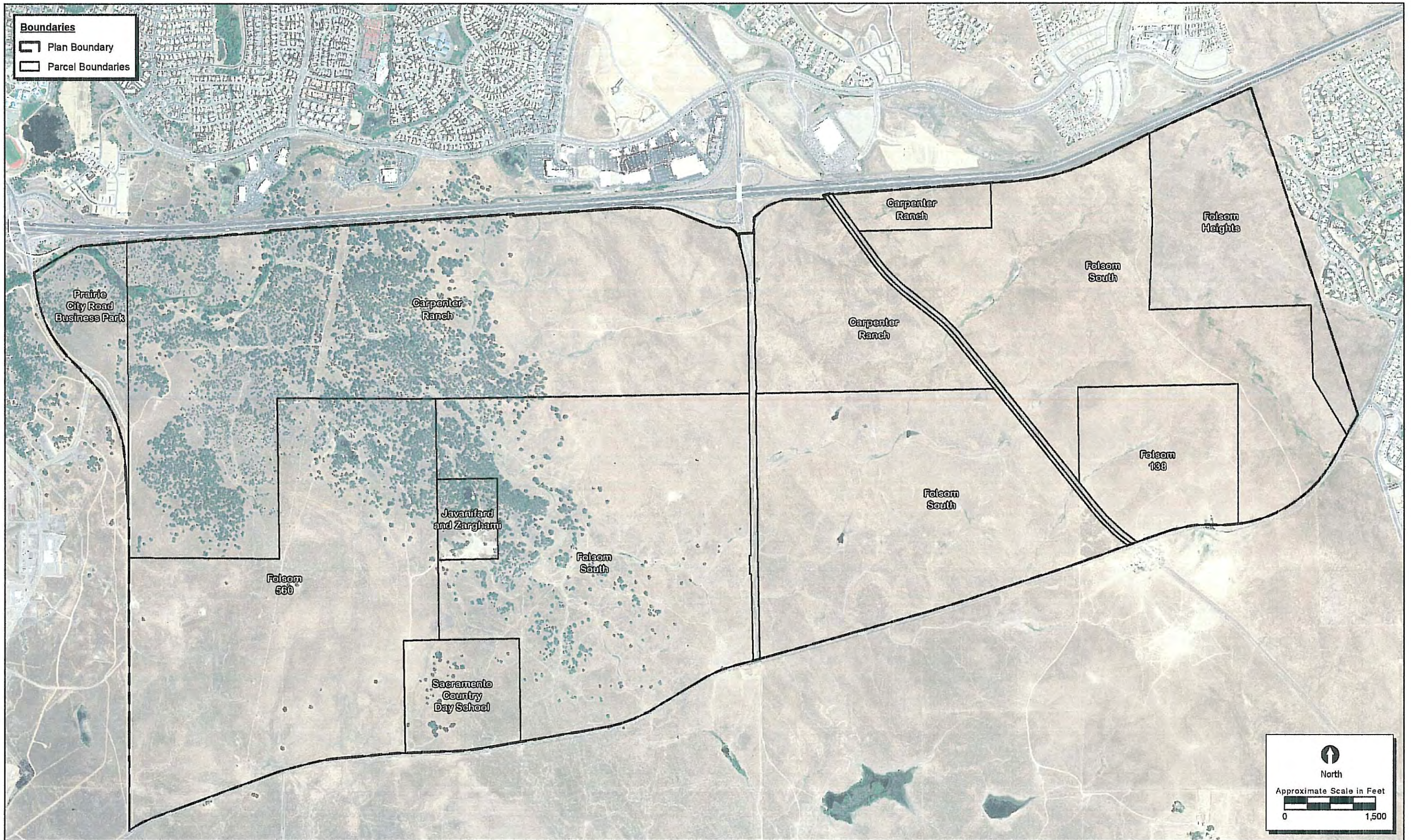


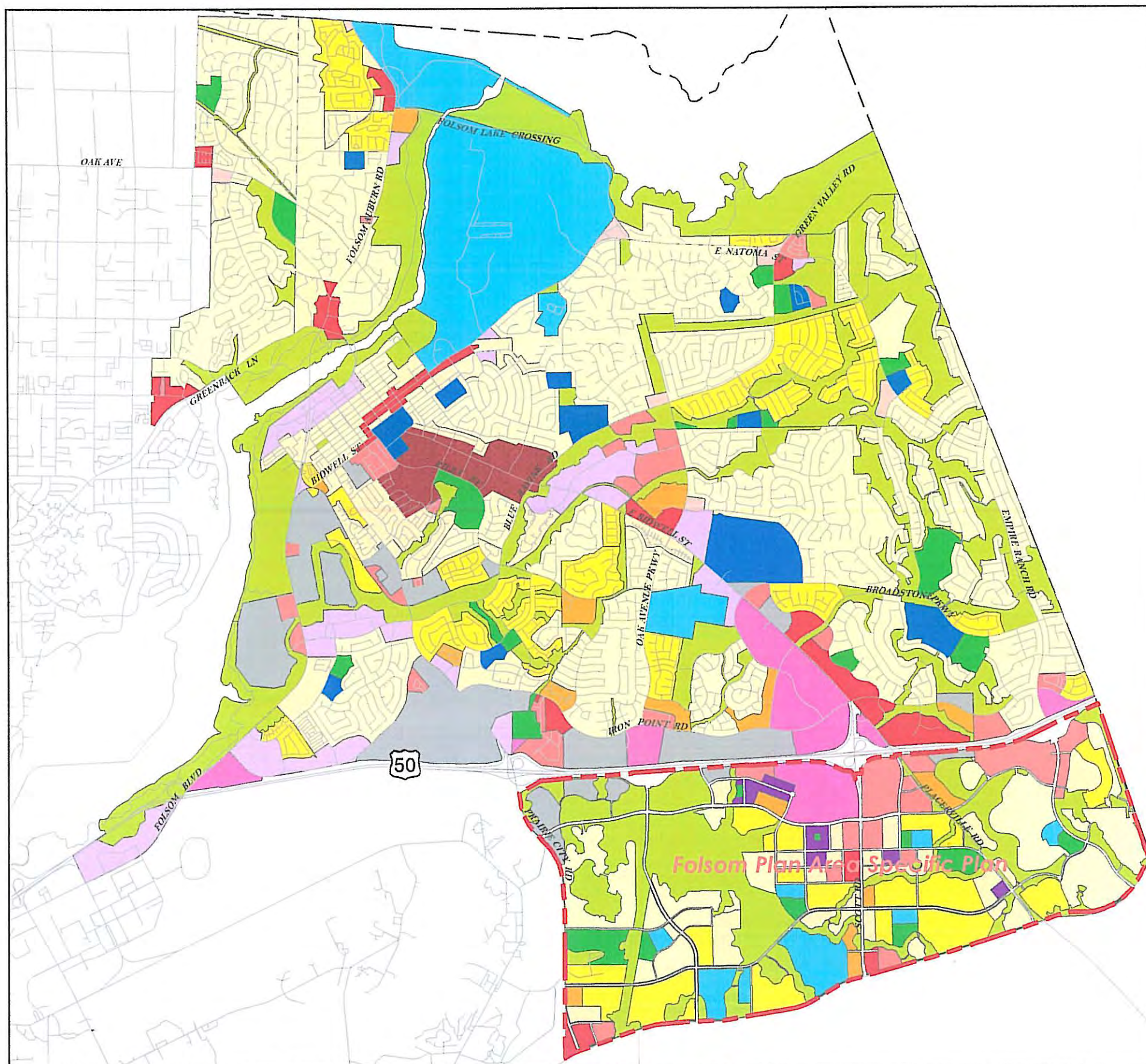
FIGURE 1. Project Site and Vicinity



J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\FPASP_Components.mxd

Figure 2. Folsom Plan Area Components
 2005-429 Folsom Plan Area Specific Plan

Map Date: 06/18/09
 Photo Date: 2007



Land Use ¹

Residential Land Uses

- SF - Single Family
- SFHD - Single Family High Density
- MLD - Multi-Family Low Density
- MMD - Multi-Family Medium Density
- MHD - Multi-Family High Density

Commercial/Industrial Land Uses

- NC - Neighborhood Commercial
- GC - General Commercial
- CC - Community Commercial
- CCD - Central Commercial Mixed Use District
- RCC - Regional Commercial
- CA - Specialty Commercial
- MU - Mixed Use (9-30 du/ac)
- IND - Industrial/Office Park

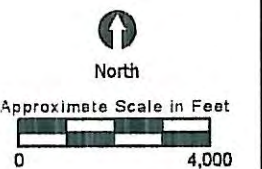
Public Land Uses

- PUB - Public
- OS - Open Space
- OS-LC - Open Space (Linear Parkway)
- P - Park
- S - Elementary School
- JHS - Junior High School

Boundaries

- Folsom Plan Area Specific Plan Boundary

¹ The land use displayed is a combination of the City of Folsom's General Plan land use and the proposed land use designations for the Folsom Plan Area Specific Plan.



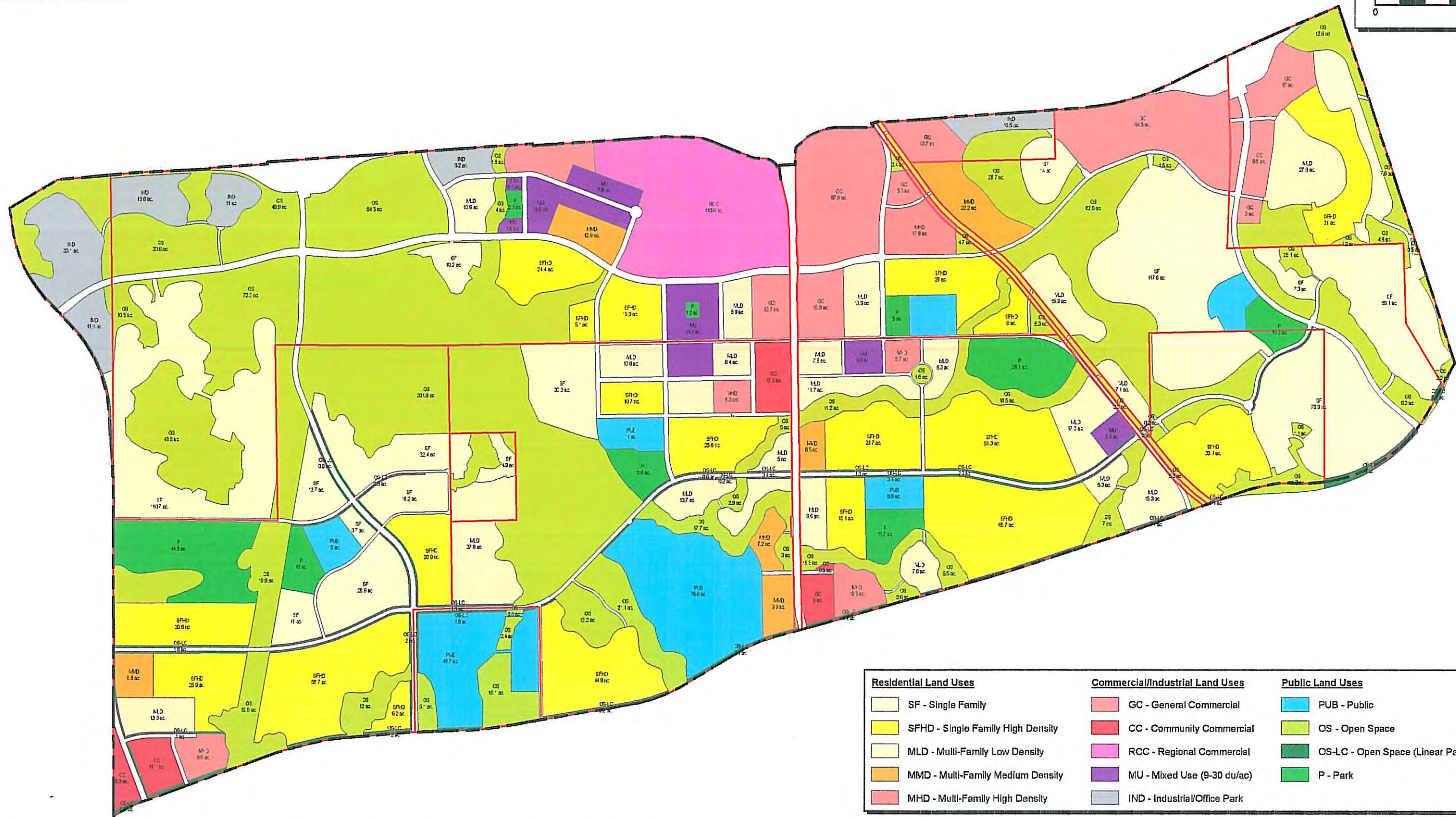
J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404\1\Onsite\6\Folsom_GP_wFPAS.mxd

Map Date: 06/18/09

Figure 3. Folsom Plan Area Specific Plan Location and Folsom General Plan
2005-429 Folsom Plan Area Specific Plan

Boundaries
 Plan Boundary
 Parcel Boundaries

North
 Approximate Scale in Feet
 0 1,500



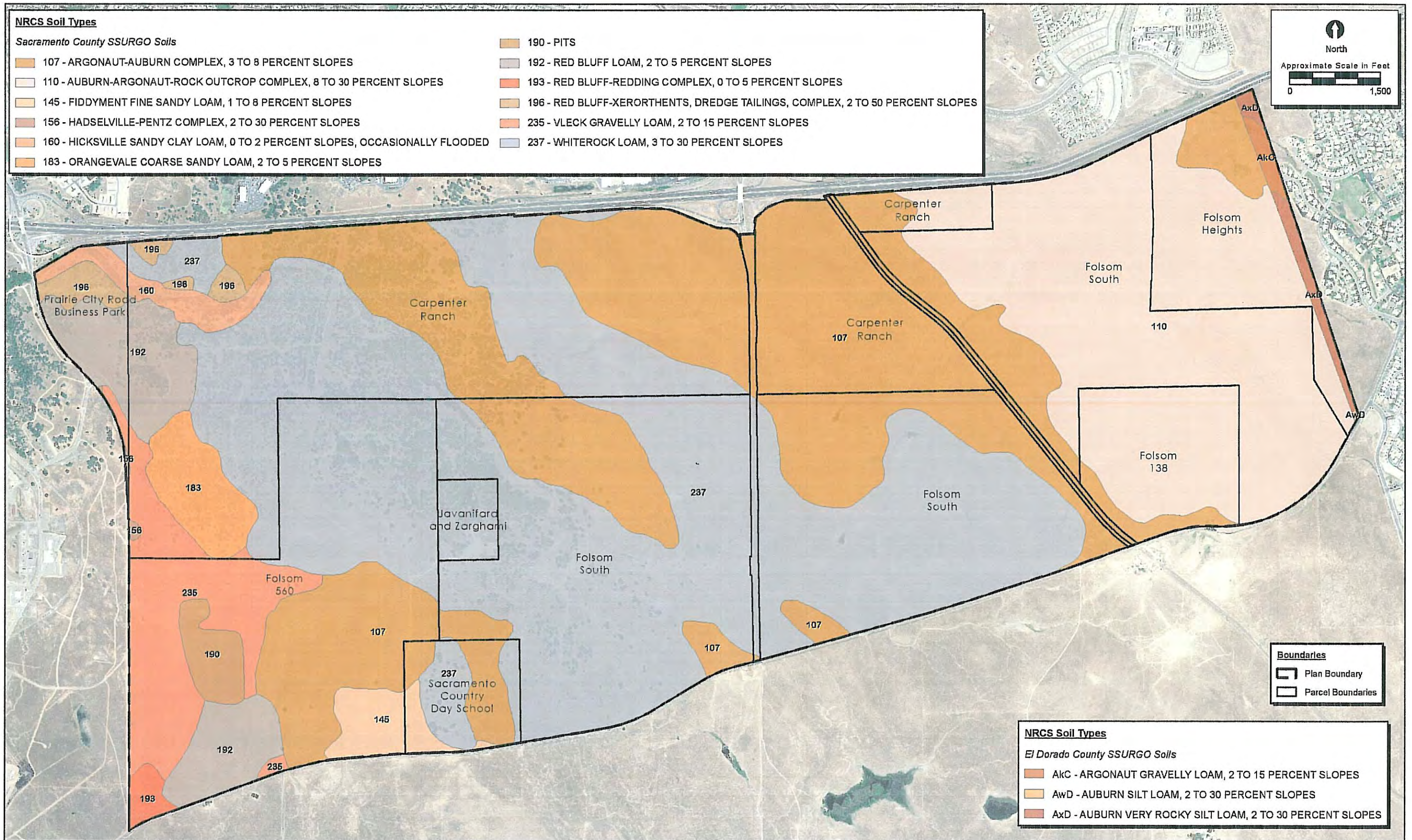
| Residential Land Uses | Commercial/Industrial Land Uses | Public Land Uses |
|-----------------------------------|---------------------------------|-------------------------------------|
| SF - Single Family | GC - General Commercial | PUB - Public |
| SFHD - Single Family High Density | CC - Community Commercial | OS - Open Space |
| MLD - Multi-Family Low Density | RCC - Regional Commercial | OS-LC - Open Space (Linear Parkway) |
| MMD - Multi-Family Medium Density | MU - Mixed Use (9-30 du/ac) | P - Park |
| MHD - Multi-Family High Density | IND - Industrial/Office Park | |

J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\FPASP_LandUse.mxd

Map Date: 06/18/09

Figure 4. Proposed Project Land Use Plan
 2005-429 Folsom Plan Area Specific Plan

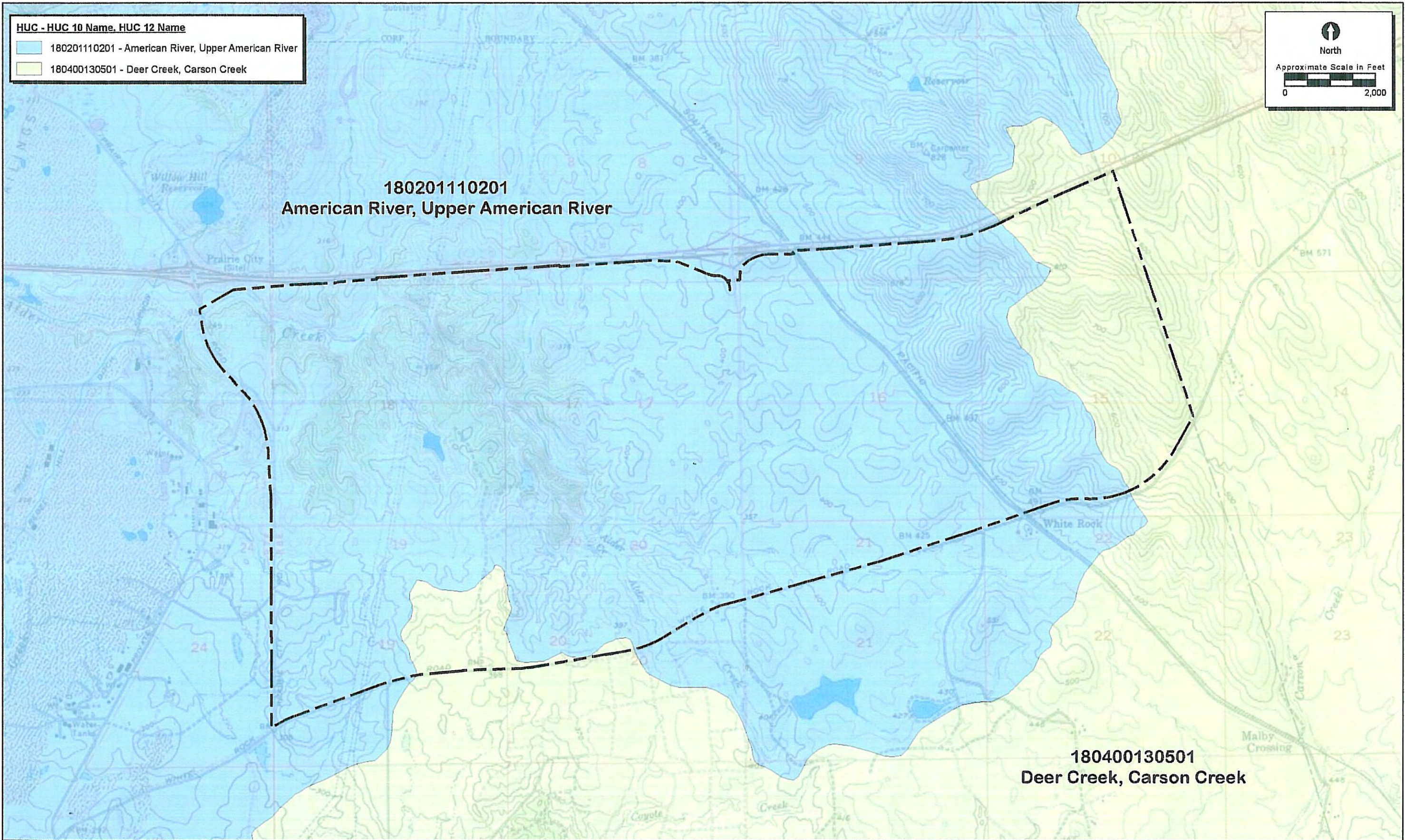




J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\FPASP_Onsite_Soils_200618.mxd

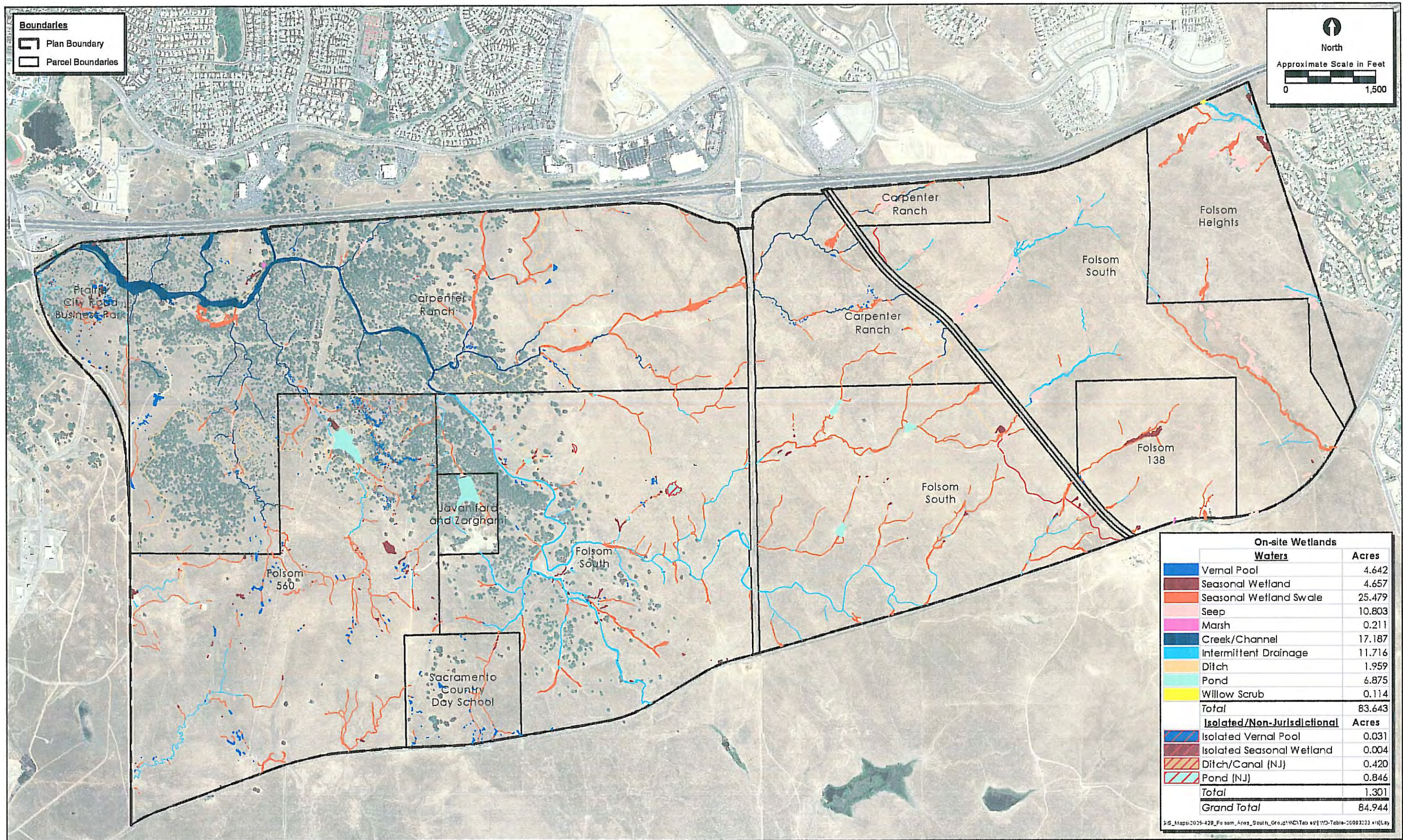
Map Date: 06/18/09

Figure 5. Natural Resources Conservation Service Soil Types
 2005-429 Folsom Plan Area Specific Plan



J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\Onsite_USGS_12Digit_Watersheds.mxd

Figure 6. USGS Watersheds
2005-429 Folsom Plan Area Specific Plan



Boundaries
 Plan Boundary
 Parcel Boundaries

North
 Approximate Scale in Feet
 0 1,500

| On-site Wetlands | |
|-----------------------------|---------------|
| Waters | Acres |
| Vernal Pool | 4.642 |
| Seasonal Wetland | 4.657 |
| Seasonal Wetland Swale | 25.479 |
| Seep | 10.803 |
| Marsh | 0.211 |
| Creek/Channel | 17.187 |
| Intermittent Drainage | 11.716 |
| Ditch | 1.959 |
| Pond | 6.875 |
| Willow Scrub | 0.114 |
| Total | 83.643 |
| Isolated/Non-Jurisdictional | |
| | Acres |
| Isolated Vernal Pool | 0.031 |
| Isolated Seasonal Wetland | 0.004 |
| Ditch/Canal (NJ) | 0.420 |
| Pond (NJ) | 0.846 |
| Total | 1.301 |
| Grand Total | 84.944 |

J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\FSAG_WD_404b1_Onsite.mxd

Map Date: 06/18/09

Figure 7. Wetland Delineation
 2005-429 Folsom Plan Area Specific Plan

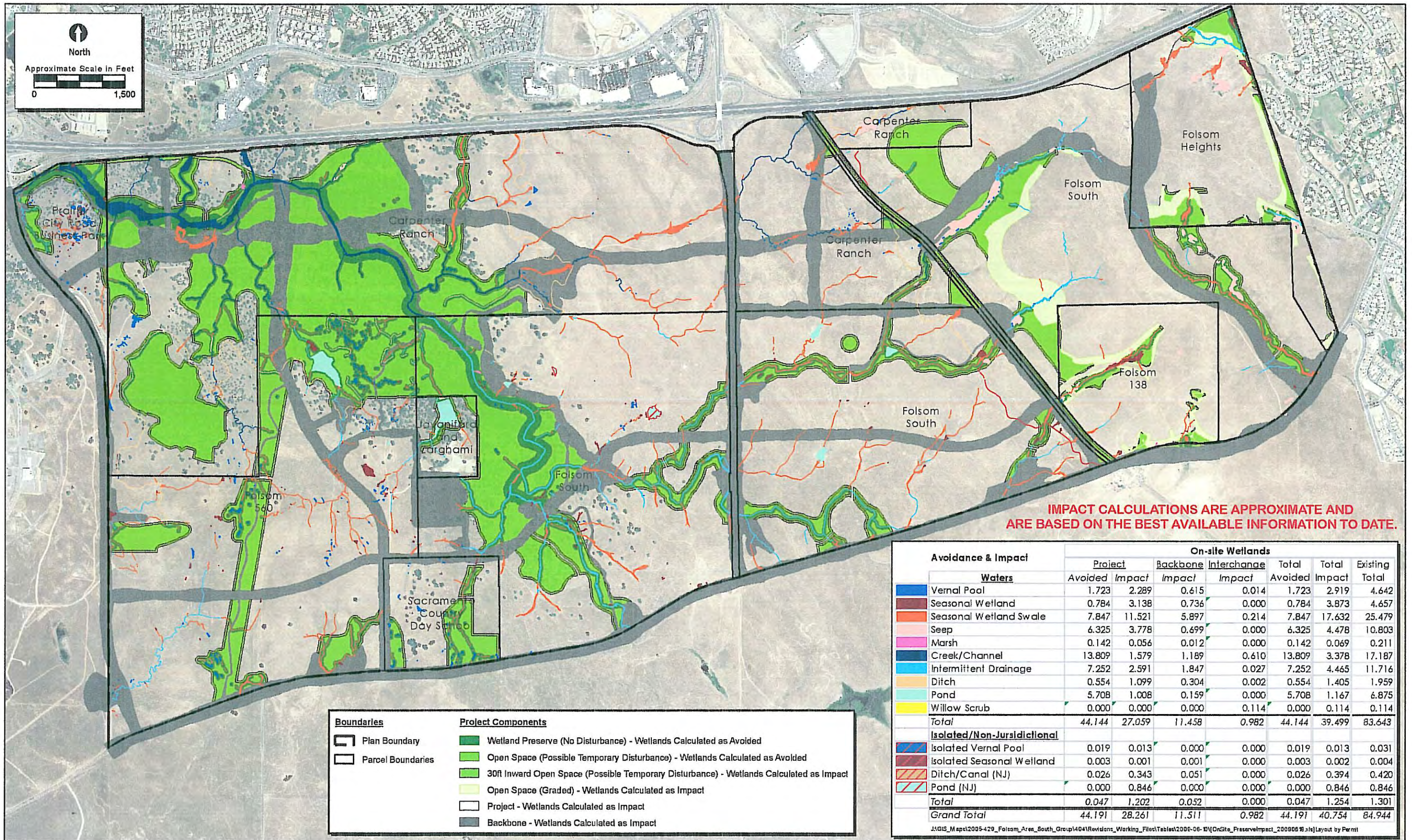
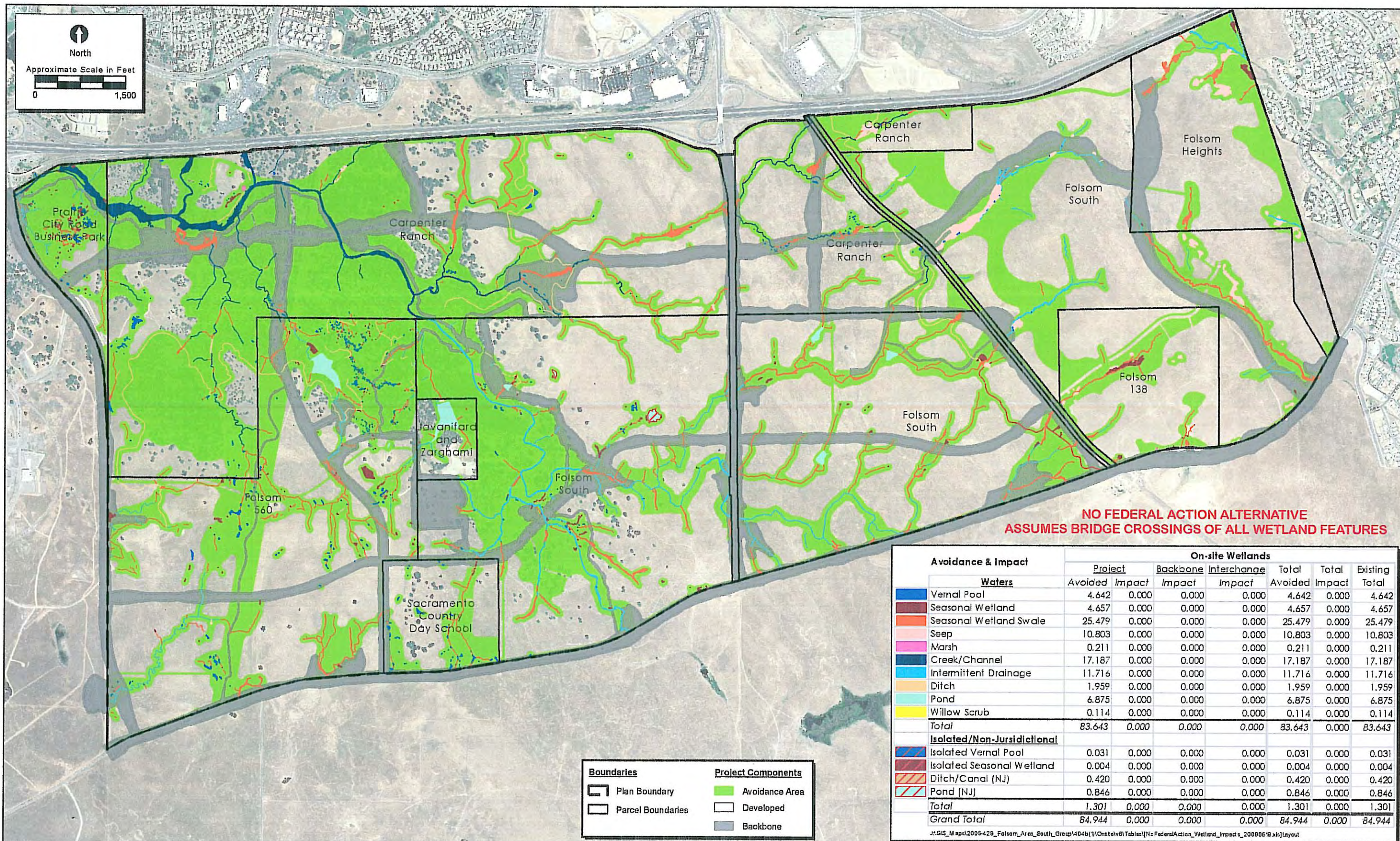


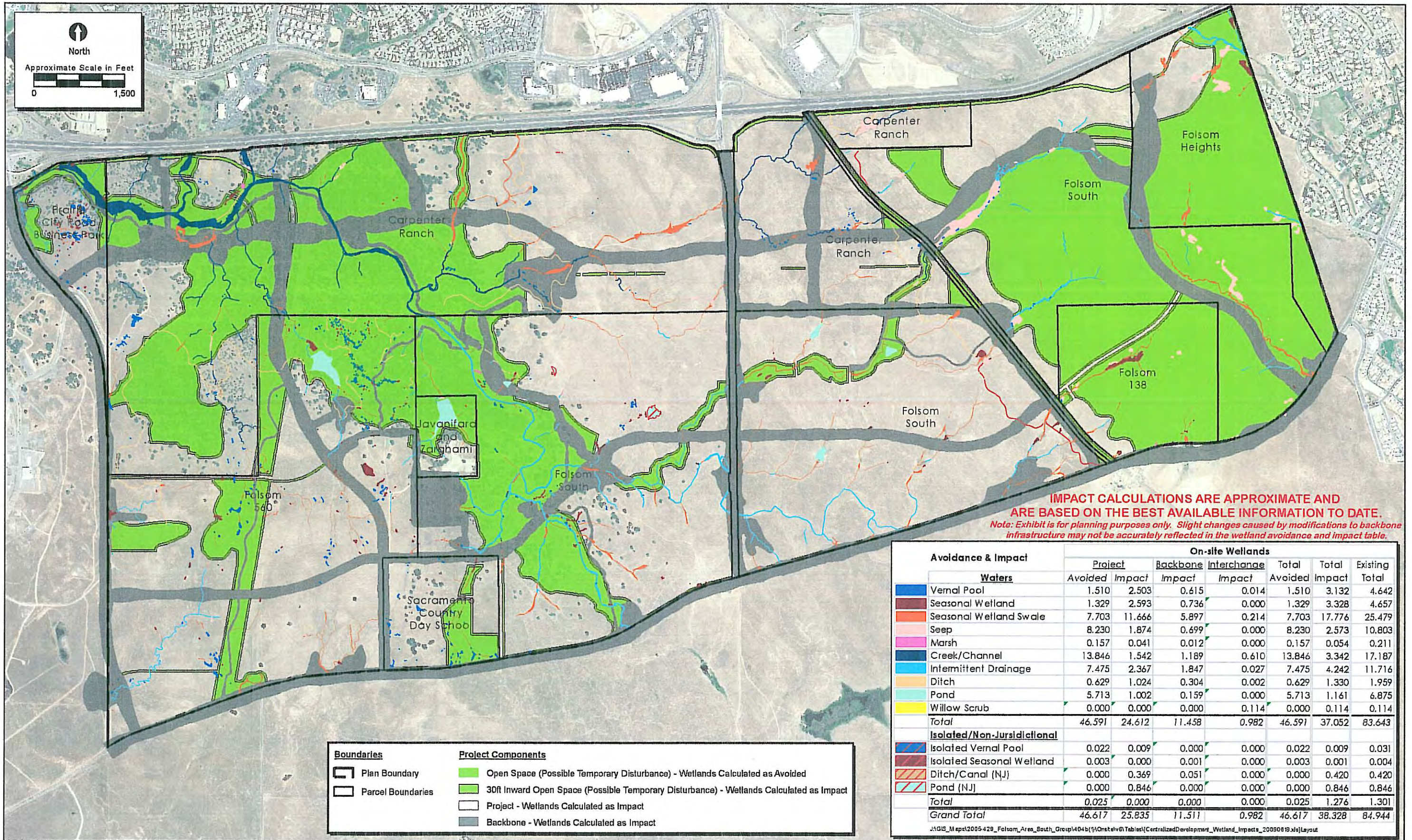
Figure 8. Proposed Project - Avoidance/Impact
2005-429 Folsom Plan Area Specific Plan



J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\MSCE_NFA_Impacts_20090618.mxd

Figure 9. Alternative 1: No Federal Action
2005-429 Folsom Plan Area Specific Plan

Map Date: 06/18/09



J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\MSCE_CD_Impacts_20050618.mxd

Map Date: 06/18/09

Figure 10. Alternative 2: Centralized Development
 2005-429 Folsom Plan Area Specific Plan

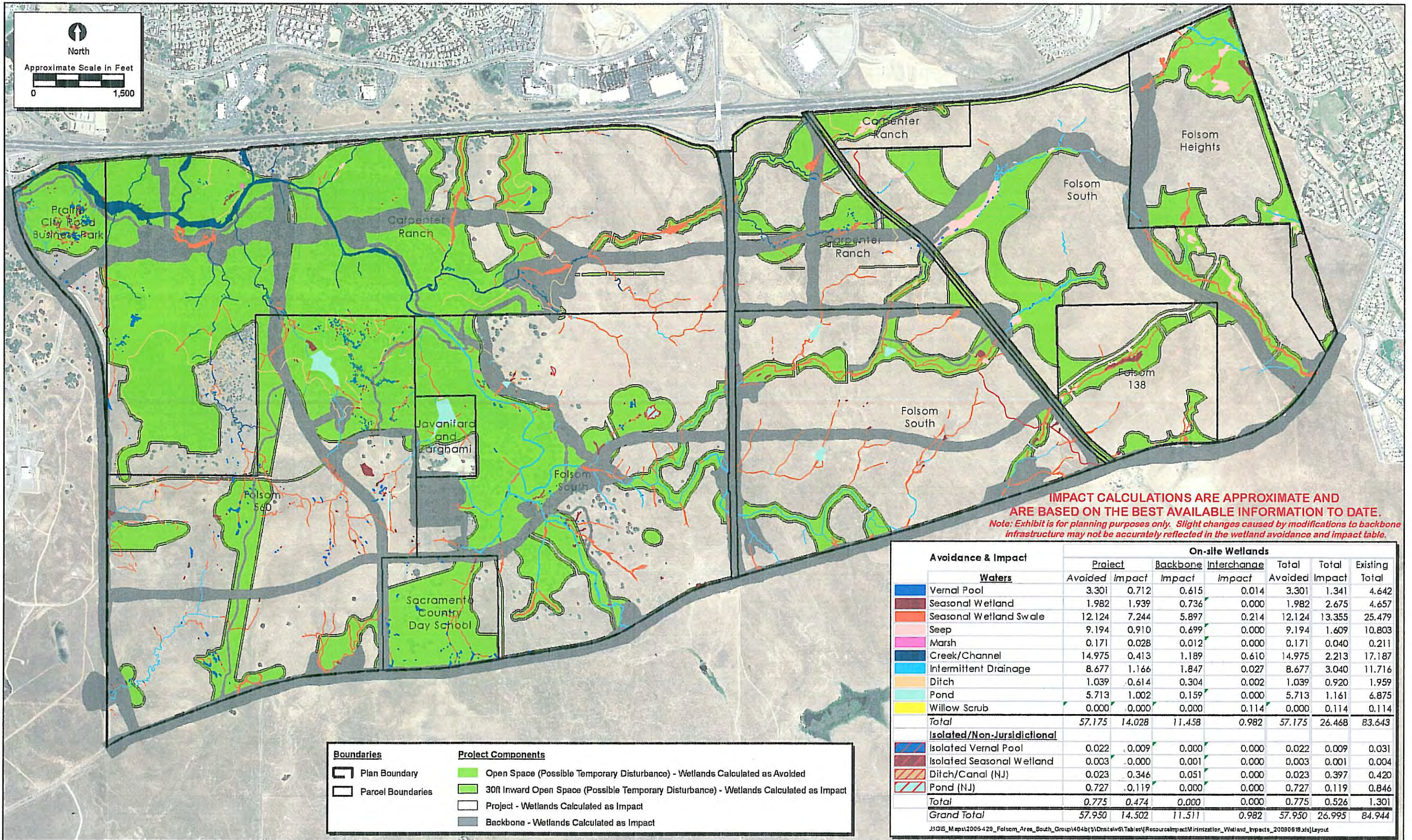


Figure 11. Alternative 3: Resource Impact Minimization
 2005-429 Folsom Plan Area Specific Plan

Map Date: 06/18/09

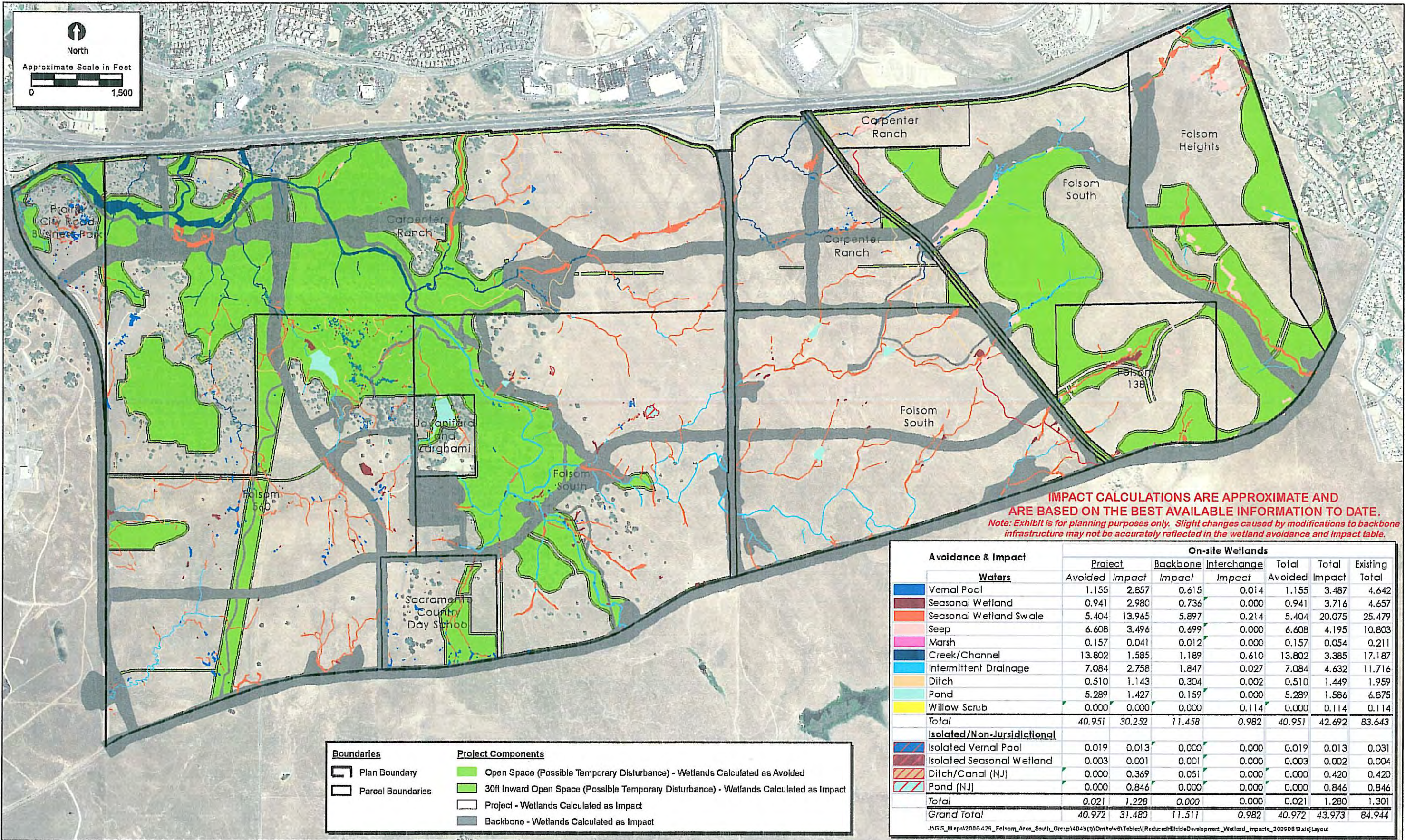
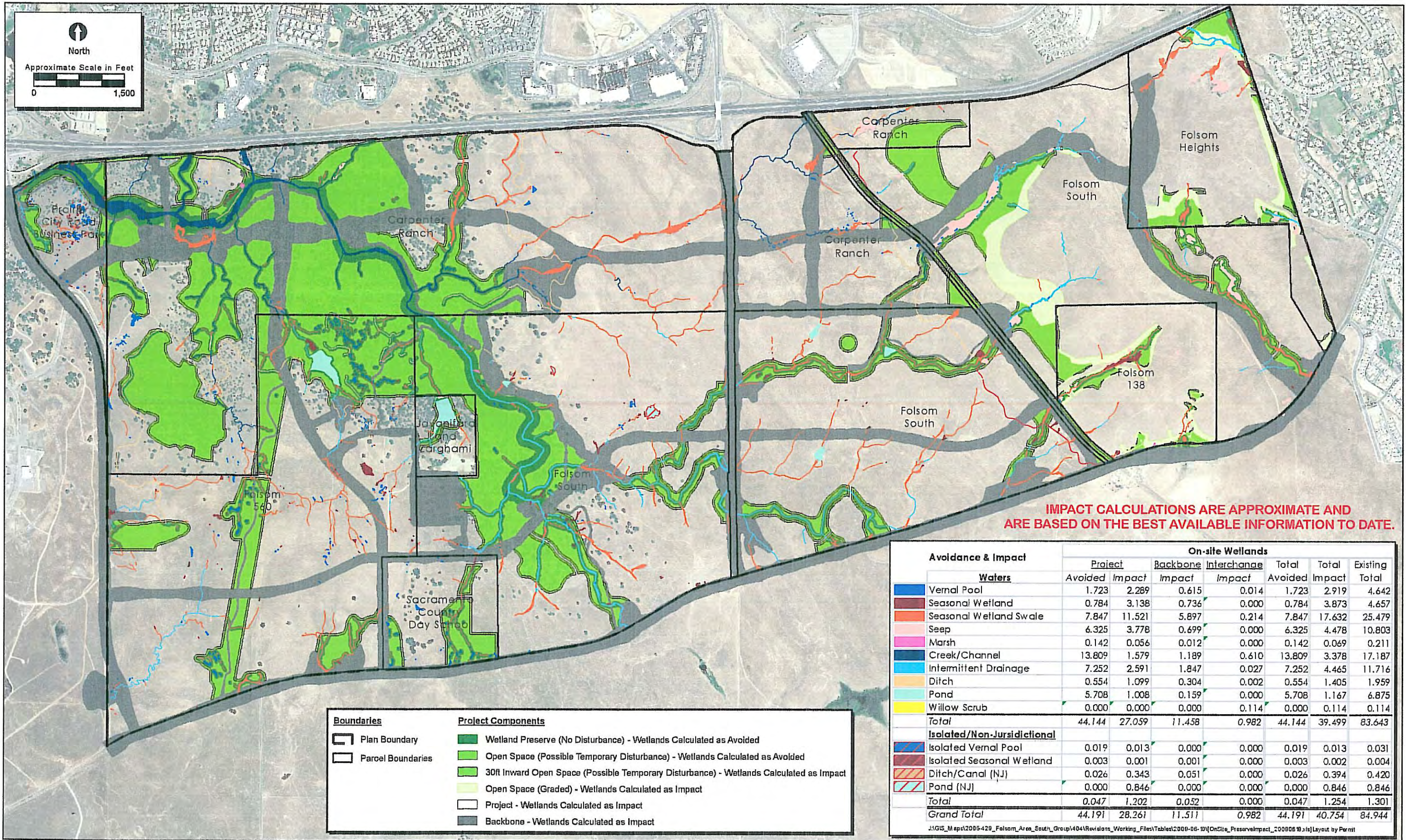


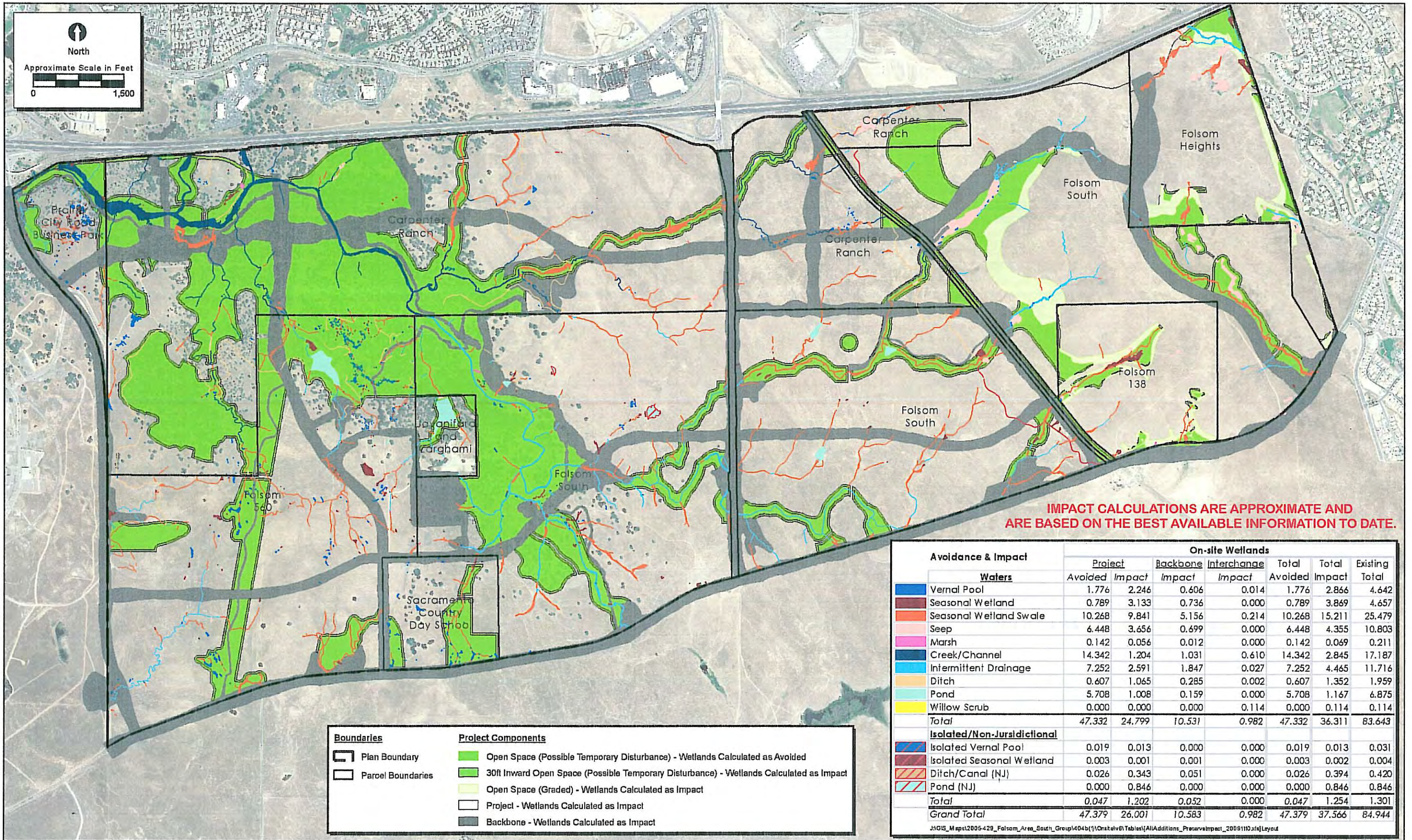
Figure 12. Alternative 4: Reduced Hillside Development
 2005-429 Folsom Plan Area Specific Plan



J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\PROPOSEDPROJECT_Impacts_20090618.mxd

Map Date: 06/18/09

Figure 13. Alternative 5: Proposed Project
 2005-429 Folsom Plan Area Specific Plan



J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\AA_AllAdd_Impacts_20090831.mxd

Map Date: 11/10/09

Figure 14. Alternative 5a: Proposed Project with Additional Avoidance Areas
 2005-429 Folsom Plan Area Specific Plan

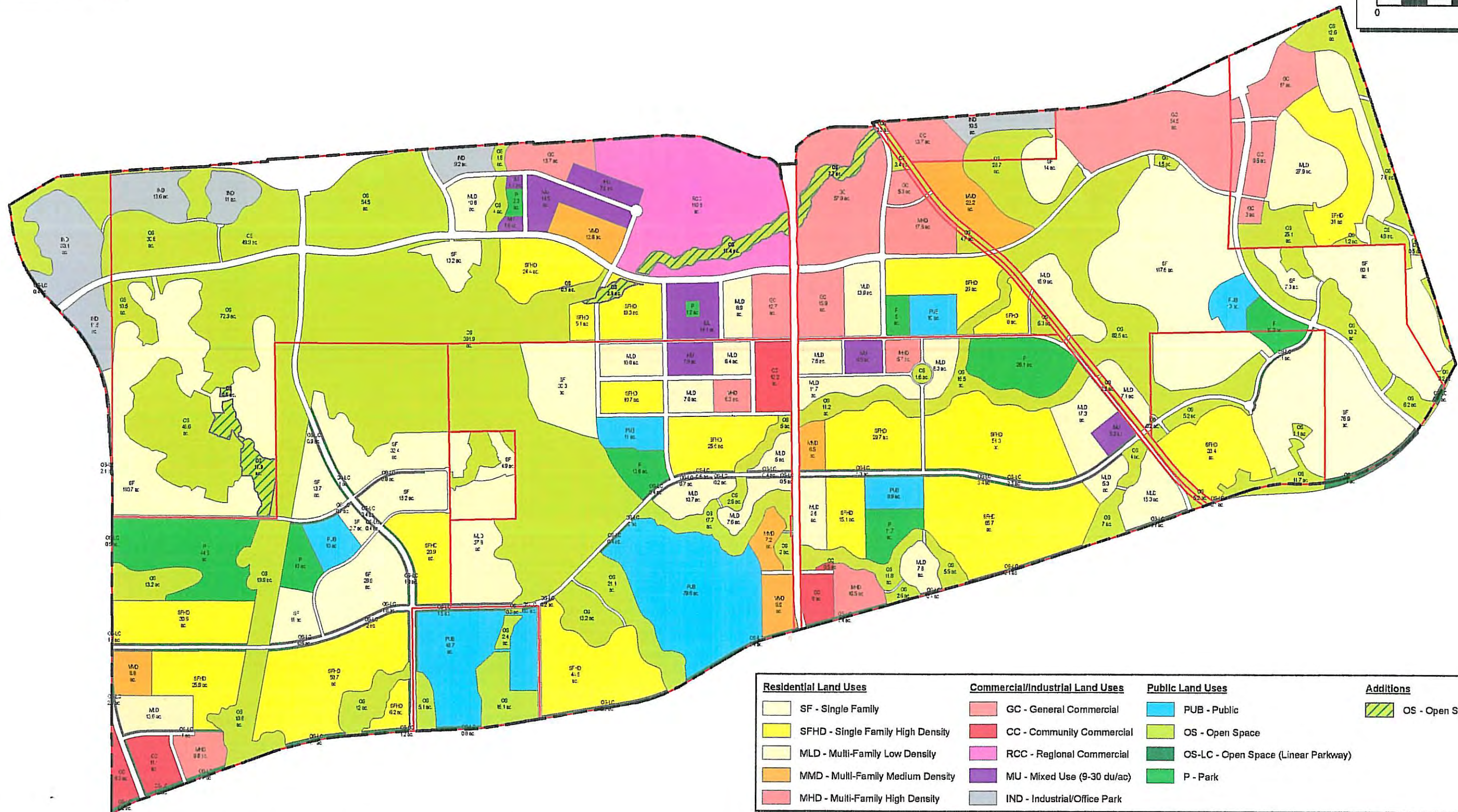
Boundaries

- Plan Boundary
- Parcel Boundaries

North

Approximate Scale in Feet

0 1,500



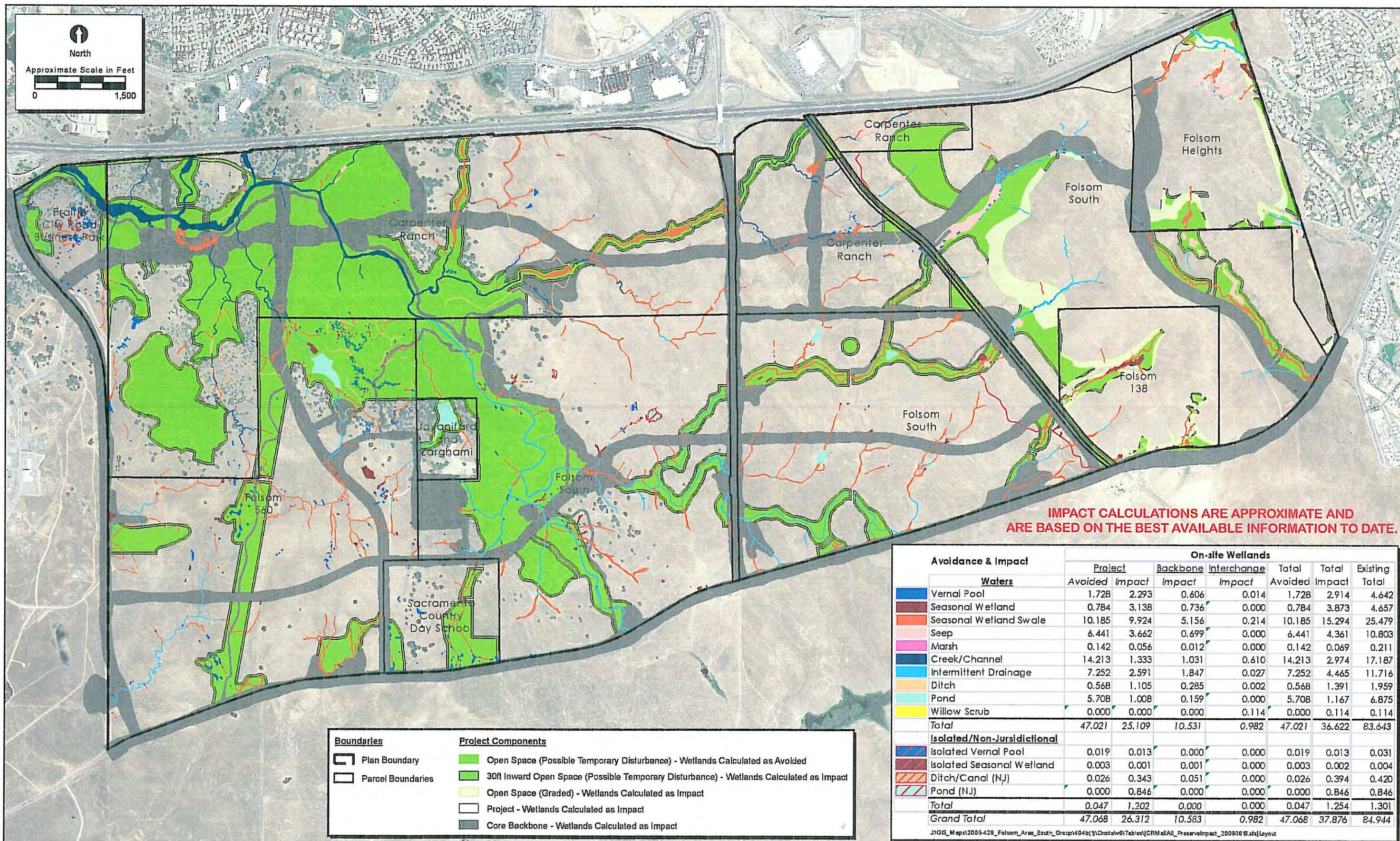
| Residential Land Uses | Commercial/Industrial Land Uses | Public Land Uses | Additions |
|-----------------------------------|---------------------------------|------------------|-------------------------------------|
| SF - Single Family | GC - General Commercial | PUB - Public | OS - Open Space |
| SFHD - Single Family High Density | CC - Community Commercial | OS - Open Space | OS-LC - Open Space (Linear Parkway) |
| MLD - Multi-Family Low Density | RCC - Regional Commercial | P - Park | |
| MMD - Multi-Family Medium Density | MU - Mixed Use (9-30 du/ac) | | |
| MHD - Multi-Family High Density | IND - Industrial/Office Park | | |

J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\FPASP_LandUse_wAddition\11_10_09.mxd

Map Date: 11/10/09

Figure 15. Alternative 5a: Proposed Project Land Use Plan with Additional Avoidance Areas
 2005-429 Folsom Plan Area Specific Plan





J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6VAA_CRM\All_Impacts_20090618.mxd

Map Date: 06/18/09

Figure 16. Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50
 2005-429 Folsom Plan Area Specific Plan

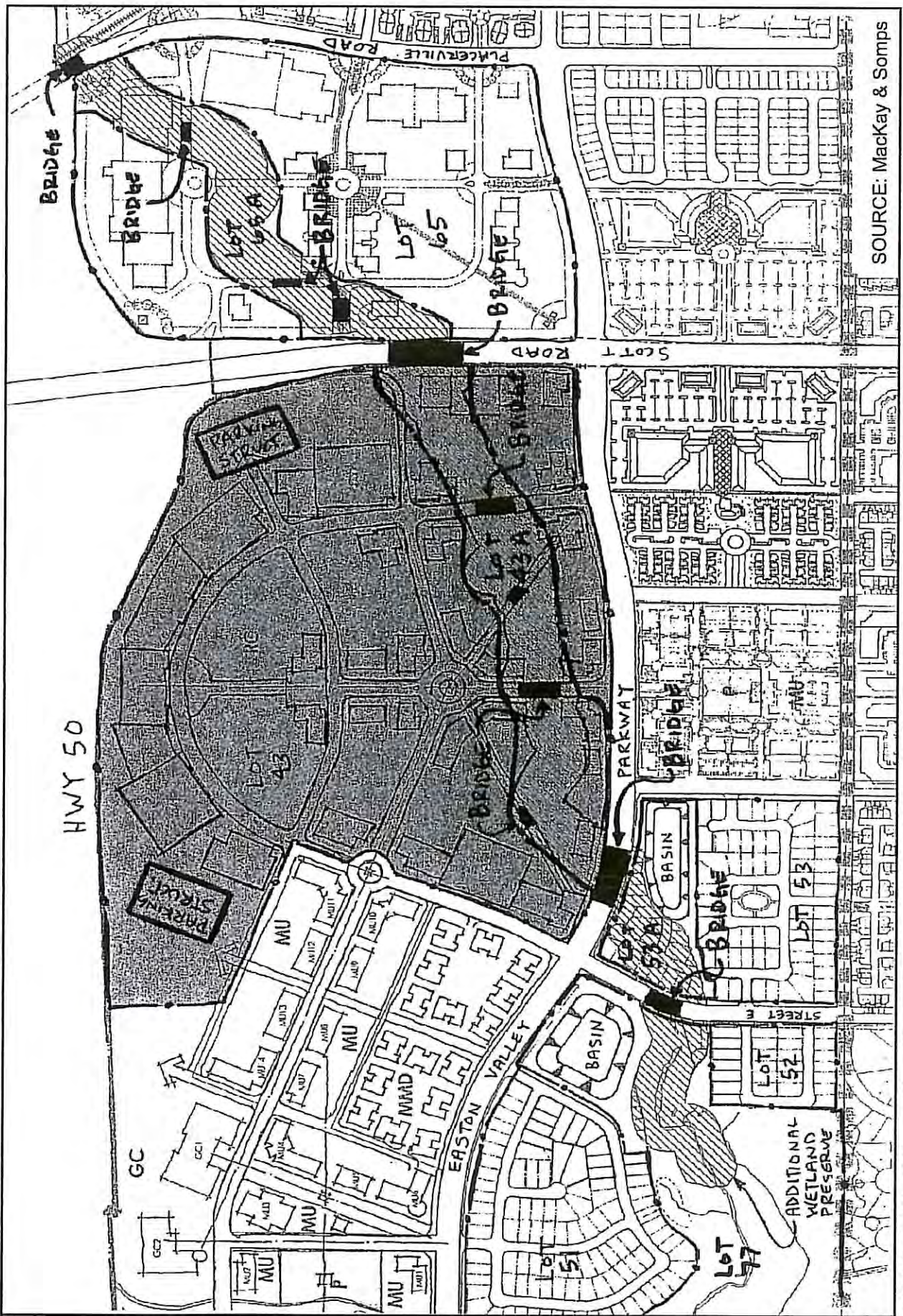
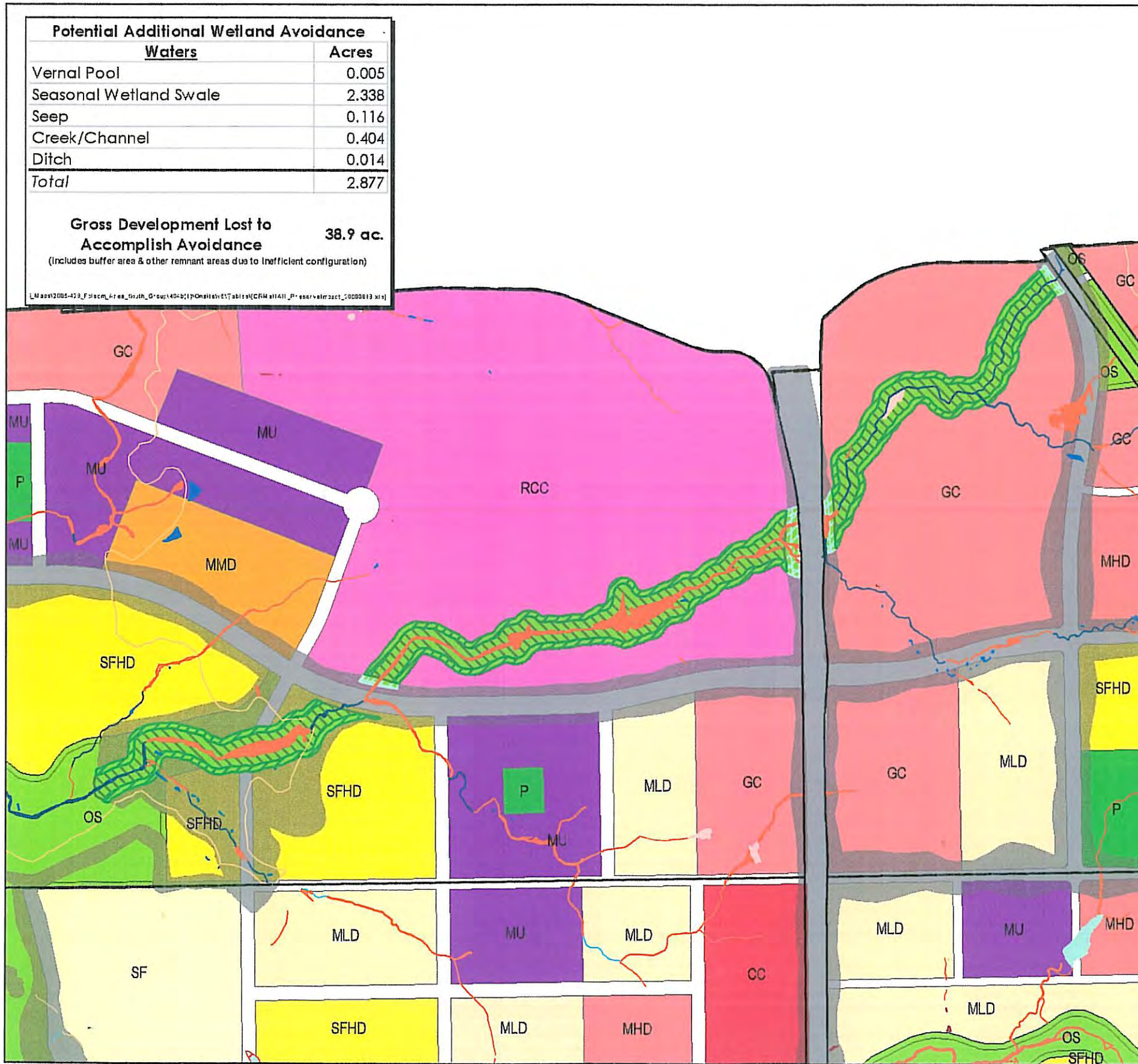


FIGURE 17. Alternative 5b. Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50



| Potential Additional Wetland Avoidance | |
|--|--------------|
| Waters | Acres |
| Vernal Pool | 0.005 |
| Seasonal Wetland Swale | 2.338 |
| Seep | 0.116 |
| Creek/Channel | 0.404 |
| Ditch | 0.014 |
| Total | 2.877 |

| | |
|--|-----------------|
| Gross Development Lost to Accomplish Avoidance | 38.9 ac. |
| <small>(Includes buffer area & other remnant areas due to inefficient configuration)</small> | |

Boundaries

- Plan Boundary
- Parcel Boundaries

Project Components

- Open Space (Possible Temporary Disturbance) - Wetlands Calculated as Avoided
- 30ft Inward Open Space (Possible Temporary Disturbance) - Wetlands Calculated as Impact
- Open Space (Graded) - Wetlands Calculated as Impact
- Project - Wetlands Calculated as Impact
- Core Backbone - Wetlands Calculated as Impact

Additional Areas

- Open Space (Possible Disturbance Due to Crossings Installation Required to Provide Internal Circulation) - Wetlands Calculated as Avoided
- 30ft Inward Open Space (Possible Temporary Disturbance) - Wetlands Calculated as Impact
- Open Space in Backbone (Graded)

Waters

- Vernal Pool
- Seasonal Wetland
- Seasonal Wetland Swale
- Seep
- Marsh
- Creek/Channel
- Intermittent Drainage
- Ditch
- Pond
- Willow Scrub

Isolated/Non-Jurisdictional Features

- Isolated Vernal Pool
- Isolated Seasonal Wetland
- Ditch/Canal (NJ)
- Pond (NJ)

Residential Land Uses

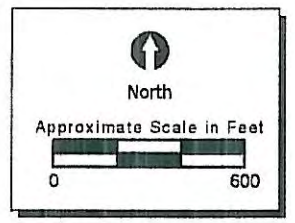
- SF - Single Family
- SFHD - Single Family High Density
- MLD - Multi-Family Low Density
- MMD - Multi-Family Medium Density
- MHD - Multi-Family High Density

Commercial/Industrial Land Uses

- GC - General Commercial
- CC - Community Commercial
- RCC - Regional Commercial
- MU - Mixed Use (9-30 du/ac)
- IND - Industrial/Office Park

Public Land Uses

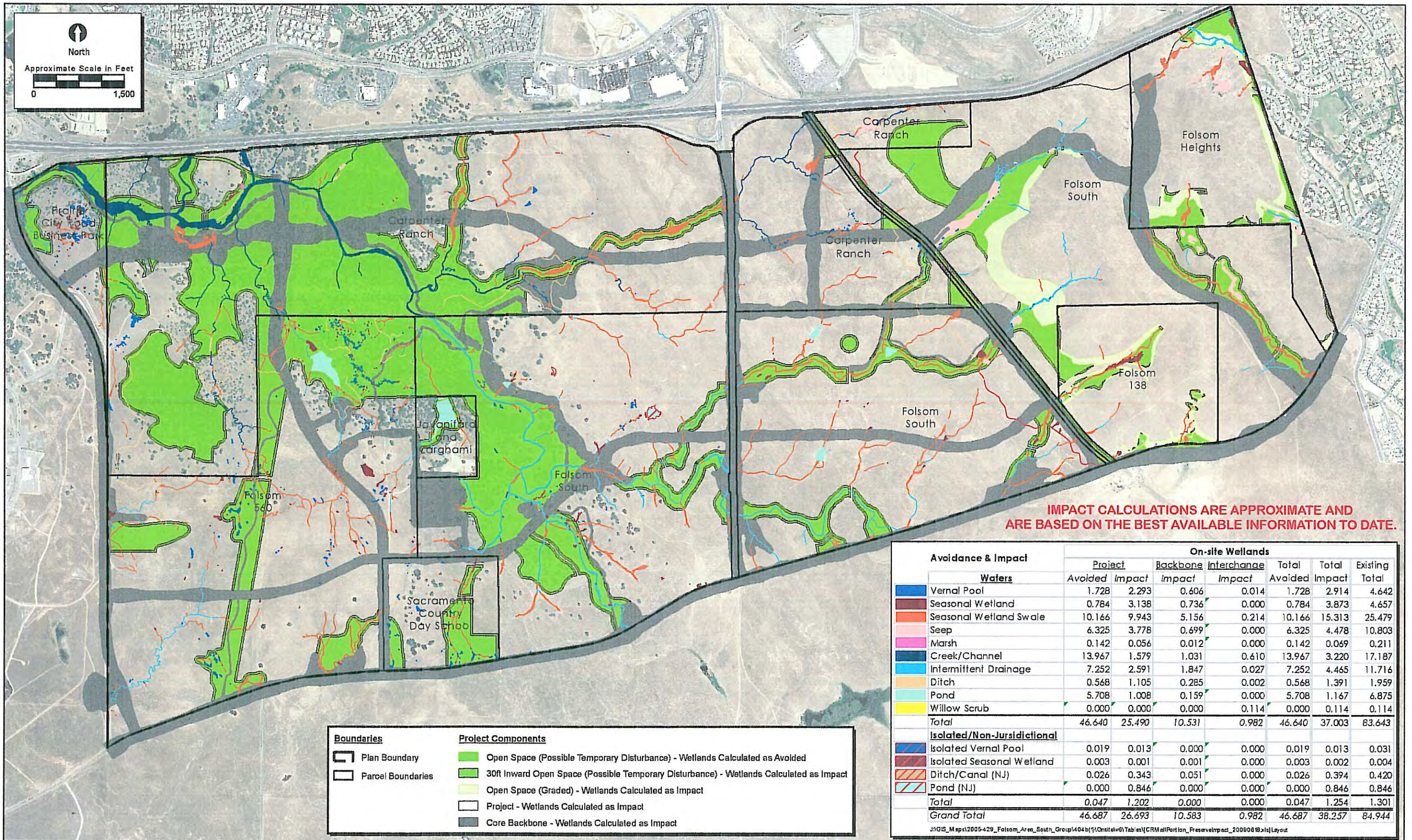
- PUB - Public
- OS - Open Space
- OS-LC - Open Space (Linear Parkway)
- P - Park



J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\AA_CRM\AI\Detail_20090622.mxd

Map Date: 06/18/09

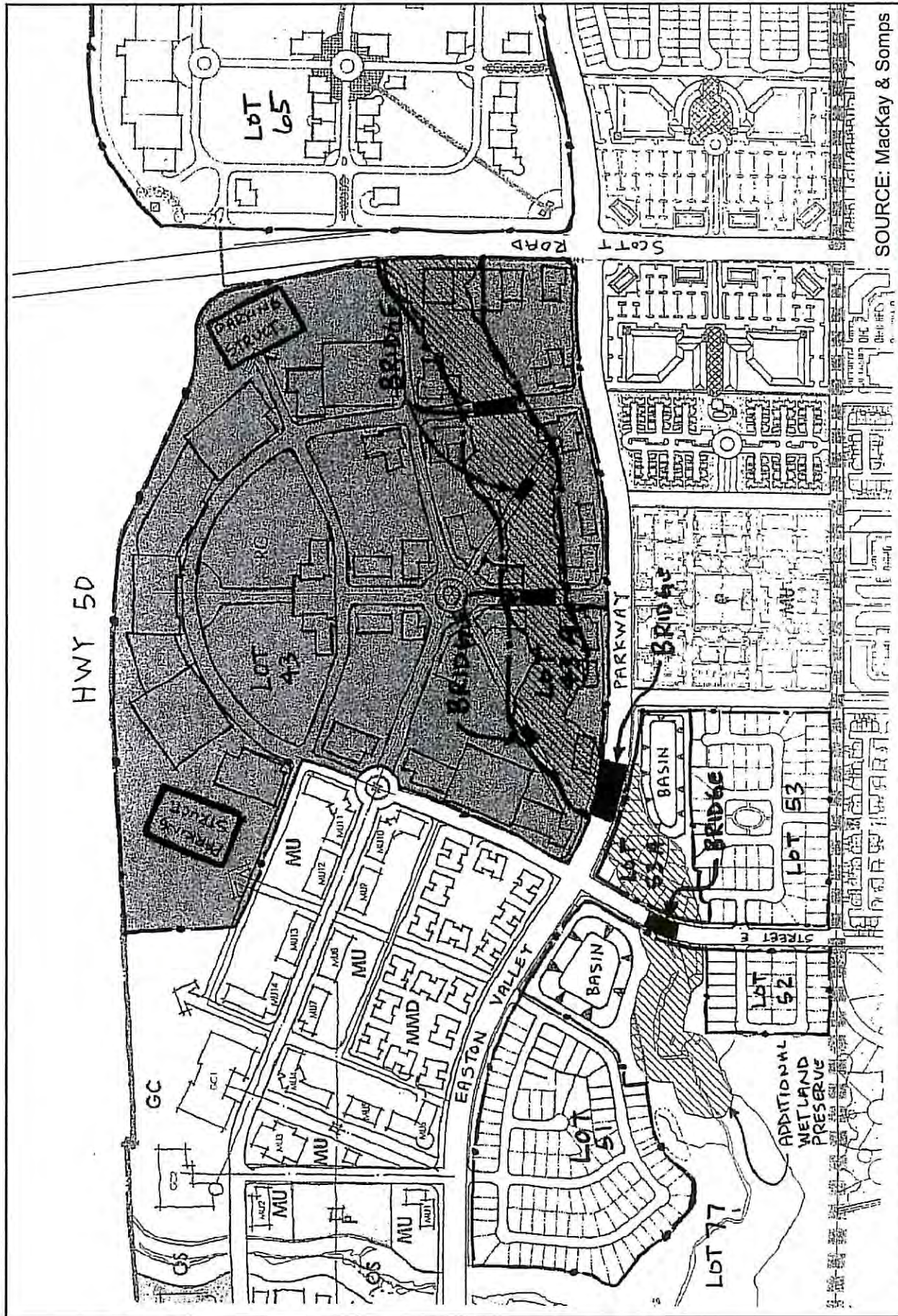
Figure 18. Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50 - Detail
 2005-429 Folsom Plan Area Specific Plan



J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\65\AA_CRM\Portion_Impacts_20090618.mxd

Map Date: 06/18/09

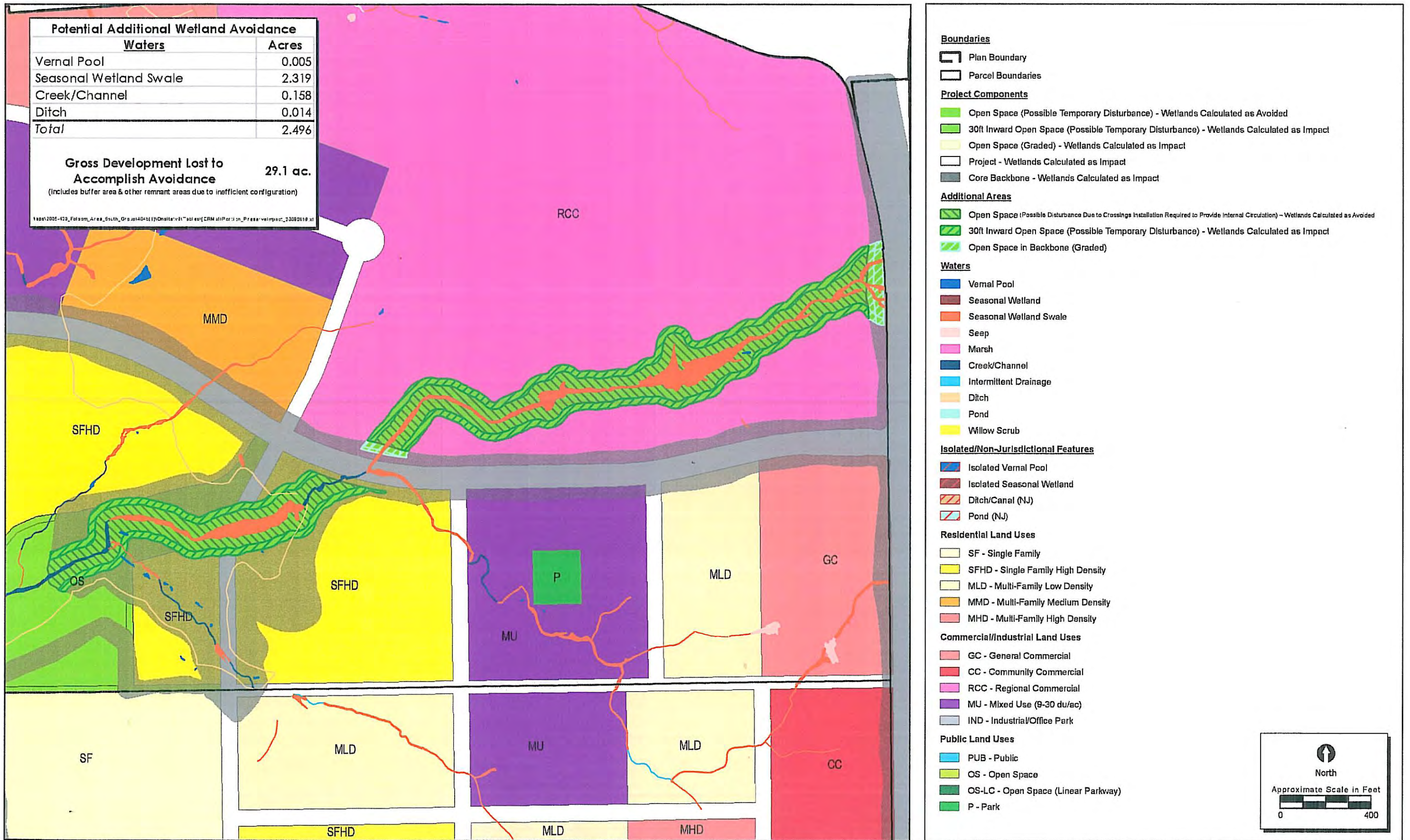
Figure 19. Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
 2005-429 Folsom Plan Area Specific Plan



SOURCE: MacKay & Soms

FIGURE 20. Alternative 5c. Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road

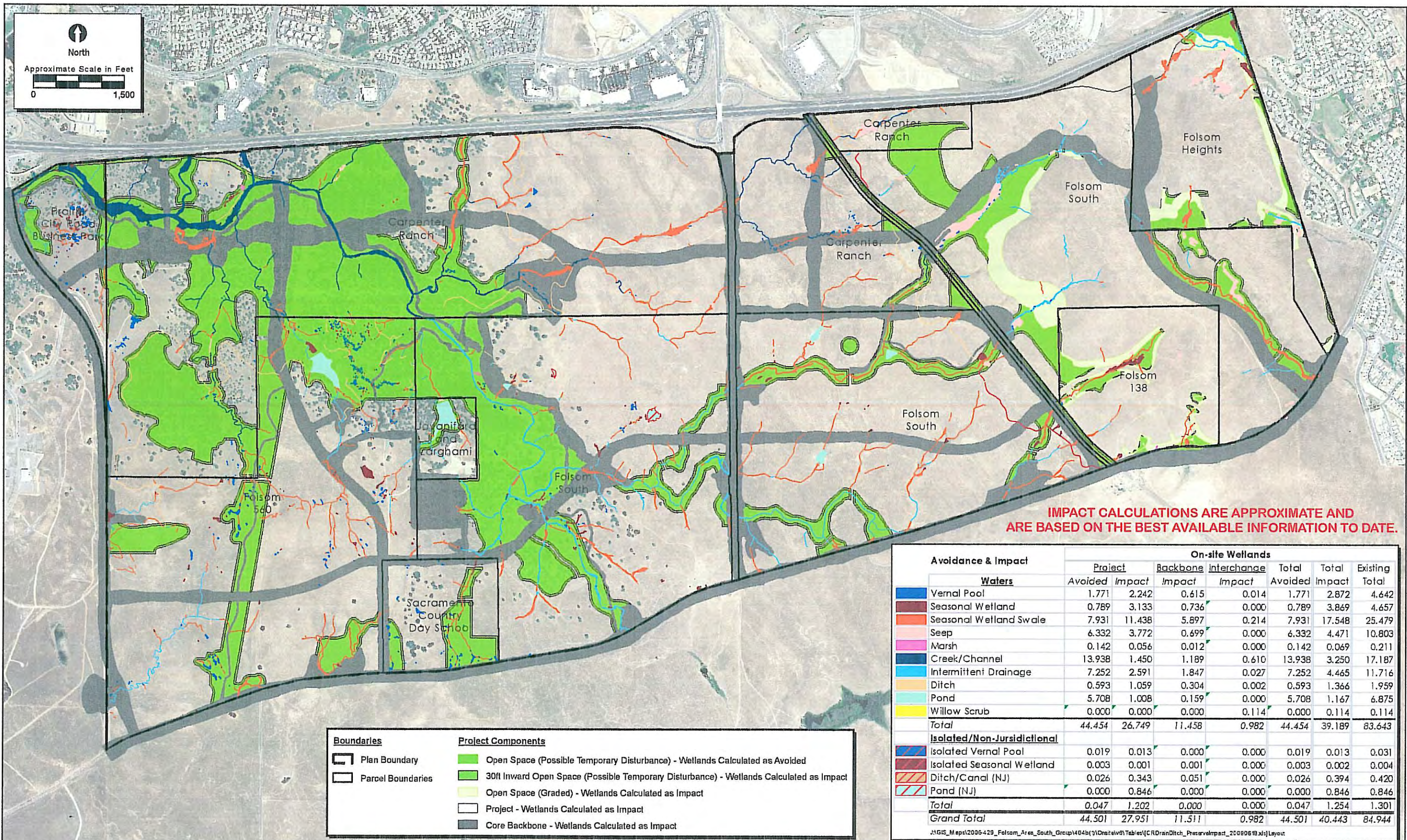




J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\AA_CRM\MapPortion_Detail_20090622.mxd

Figure 21. Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road - Detail
 2005-429 Folsom Plan Area Specific Plan

Map Date: 06/18/09



J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\AA_CRDrainDitch_Impacts_20090615.mxd

Map Date: 06/18/09

Figure 22. Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch
 2005-429 Folsom Plan Area Specific Plan

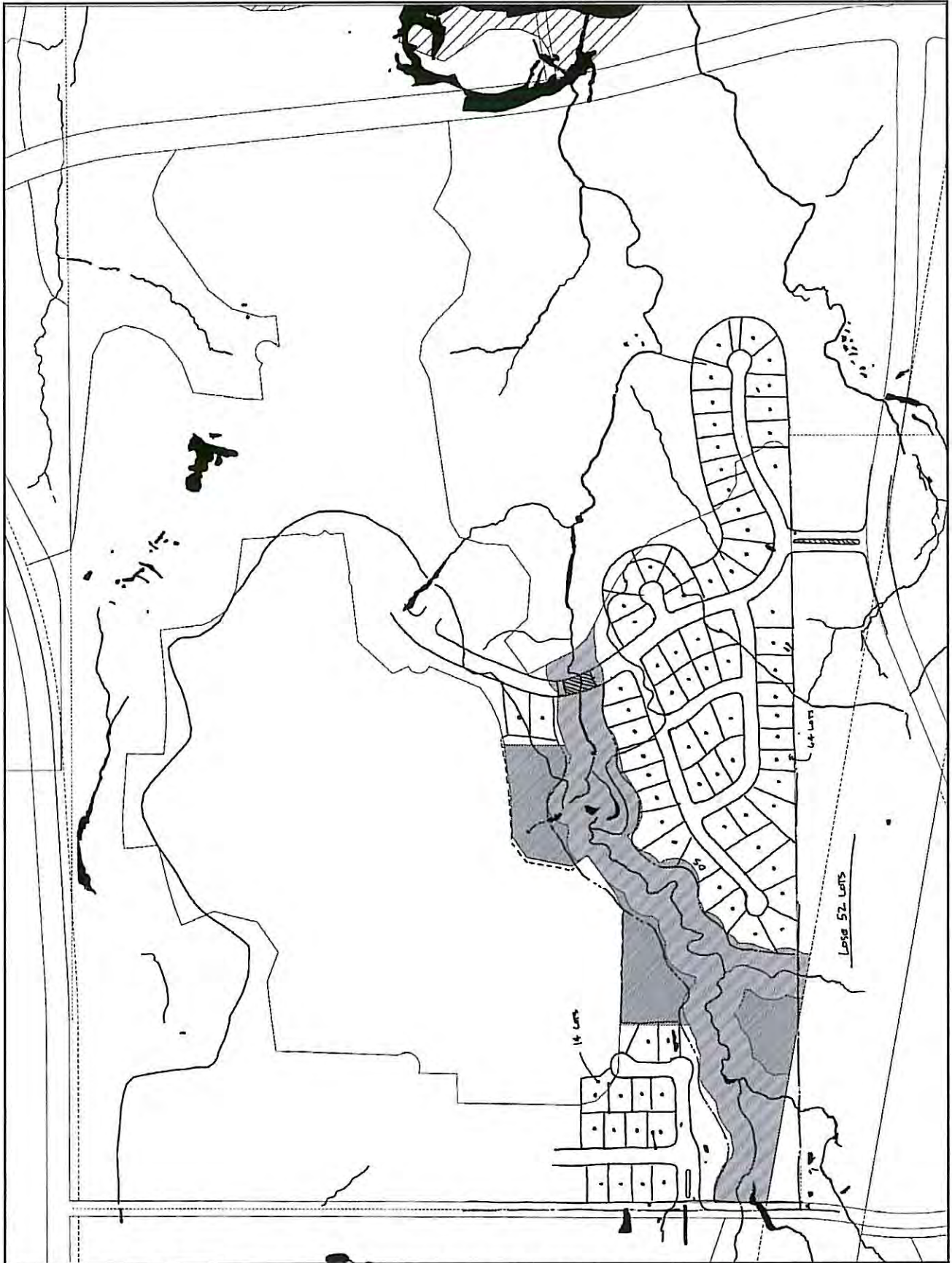
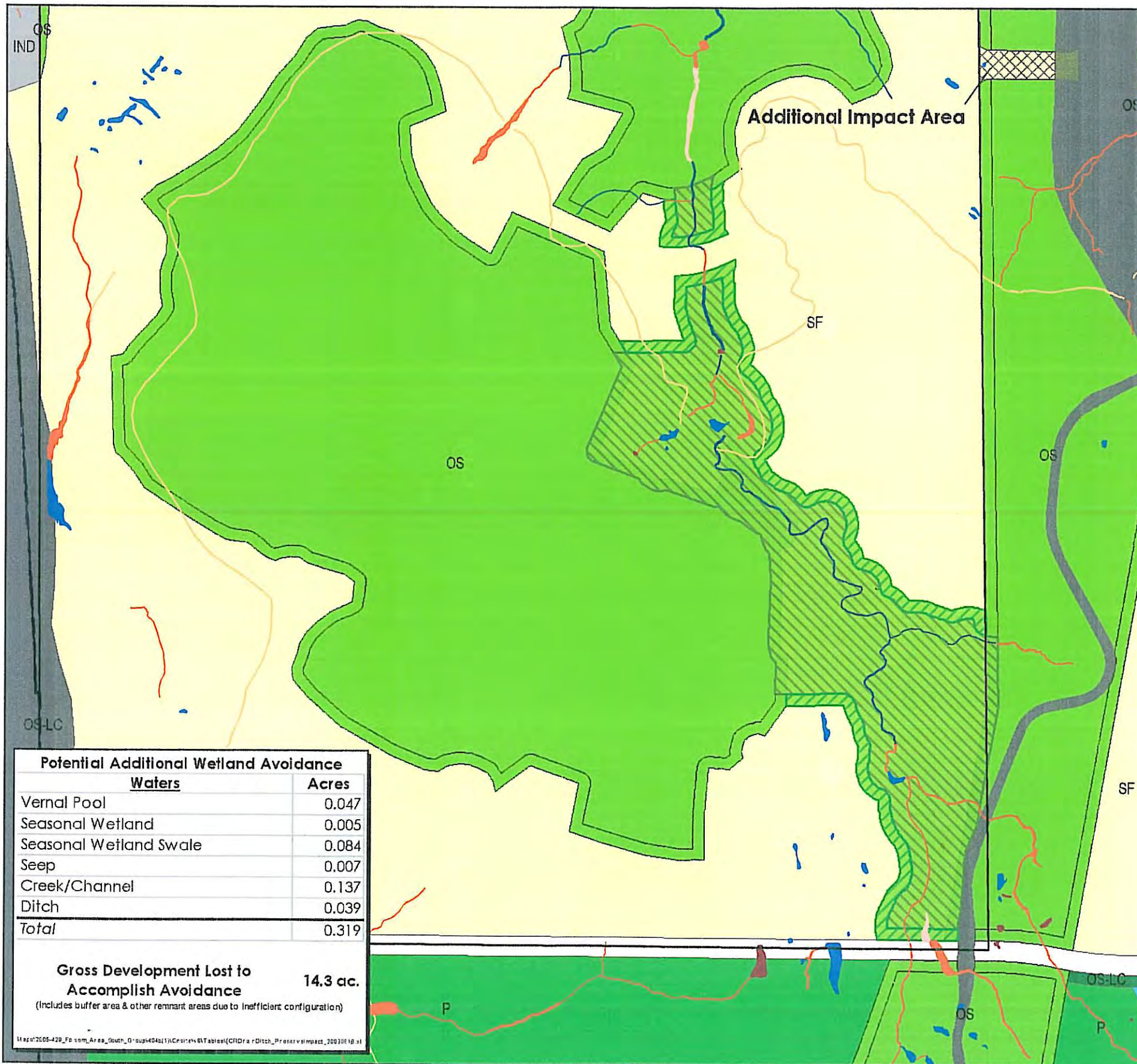


FIGURE 23. Alternative 5d. Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch



| Potential Additional Wetland Avoidance | |
|--|--------------|
| Waters | Acres |
| Vernal Pool | 0.047 |
| Seasonal Wetland | 0.005 |
| Seasonal Wetland Swale | 0.084 |
| Seep | 0.007 |
| Creek/Channel | 0.137 |
| Ditch | 0.039 |
| Total | 0.319 |

Gross Development Lost to Accomplish Avoidance **14.3 ac.**
 (Includes buffer area & other remnant areas due to inefficient configuration)

J:\GIS_Maps\2005-429_Folsom_Area_South_Group\404b(1)\Onsite\6\AA_CRDrainDitch_Detail_20090622.mxd

Boundaries

- Plan Boundary
- Parcel Boundaries

Project Components

- Open Space (Possible Temporary Disturbance) - Wetlands Calculated as Avoided
- 30ft Inward Open Space (Possible Temporary Disturbance) - Wetlands Calculated as Impact
- Open Space (Graded) - Wetlands Calculated as Impact
- Project - Wetlands Calculated as Impact
- Core Backbone - Wetlands Calculated as Impact

Additional Areas

- Open Space - Wetlands Calculated as Avoided
- 30ft Inward Open Space (Possible Temporary Disturbance) - Wetlands Calculated as Impact
- Additional Impact Area - Wetlands Calculated as Impact

Waters

- Vernal Pool
- Seasonal Wetland
- Seasonal Wetland Swale
- Seep
- Marsh
- Creek/Channel
- Intermittent Drainage
- Ditch
- Pond
- Willow Scrub

Isolated/Non-Jurisdictional Features

- Isolated Vernal Pool
- Isolated Seasonal Wetland
- Ditch/Canal (NJ)
- Pond (NJ)

Residential Land Uses

- SF - Single Family
- SFHD - Single Family High Density
- MLD - Multi-Family Low Density
- MMD - Multi-Family Medium Density
- MHD - Multi-Family High Density

Commercial/Industrial Land Uses

- GC - General Commercial
- CC - Community Commercial
- RCC - Regional Commercial
- MU - Mixed Use (9-30 du/ac)
- IND - Industrial/Office Park

Public Land Uses

- PUB - Public
- OS - Open Space
- OS-LC - Open Space (Linear Parkway)
- P - Park

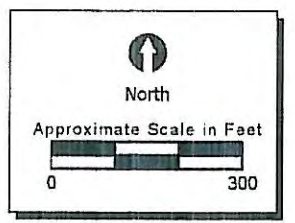


Figure 24. Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch - Detail
 2005-429 Folsom Plan Area Specific Plan

LIST OF ATTACHMENTS

Attachment A – Wetland Delineation Verification Letter

Attachment B – Land Use and Cost Tables

Attachment C – Letters Regarding Mall Design Requirements

Attachment D – Drainage Characterization – Carpenter Ranch

ATTACHMENT A

Wetland Delineation Verification Letter



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

July 23, 2007

Regulatory Branch (200600984)

Steve Chamberlain
Colliers International
1610 Arden Way, Suite 240
Sacramento, California 95661

Dear Mr. Chamberlain:

We are responding to your consultant's request for an approved jurisdictional determination for the Carpenter Ranch site. This approximately 1,054-acre site is located in Sections 7, 8, 9, 16, 17, and 18 of Township 9 North, Range 8 East, MDB&M, near the City of Folsom, Sacramento County, California.

Based on available information, we concur with the estimate of waters of the United States, as depicted on Sheet 1 through Sheet 4 of the drawing entitled "Jurisdictional Delineation, Carpenter Ranch", revised June 2007, prepared by Gibson and Skordal, LLC. Approximately 27.7465 acres of waters of the United States, including wetlands, are present within the survey area. These waters are regulated under Section 404 of the Clean Water Act since they are tributary to or adjacent to tributaries to Alder Creek and Deer Creek.

The 0.0191 acres of vernal pools identified as V52, V53, V54, V70, V71, and V87 on the above drawing are intrastate isolated waters with no apparent interstate or foreign commerce connection. As such, these waters are not currently regulated by the Corps of Engineers. This disclaimer of jurisdiction is only for Section 404 of the Federal Clean Water Act. Other Federal, State, and local laws may apply to your activities. In particular, you may need authorization from the California State Water Resources Control Board and/or the U.S. Fish and Wildlife Service.

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. This letter contains an approved jurisdictional determination for your subject site. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR Part 331.

A Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form is enclosed. If you request to appeal this determination you must submit a completed RFA form to the South Pacific Division Office at the following address: Administrative Appeal Review

Officer, Army Corps of Engineers, South Pacific Division, CESPDPDS-O, 1455 Market Street, San Francisco, California 94103-1399, Telephone: 415-503-6574, FAX: 415-503-6646.

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the NAP. Should you decide to submit an RFA form, it must be received at the above address by 60 days from the date of this letter. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

You should provide a copy of this letter and notice to all other affected parties, including any individual who has an identifiable and substantial legal interest in the property.

This determination has been conducted to identify the limits of Corps of Engineers' Clean Water Act jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

Please refer to identification number 200600984 in any correspondence concerning this project. If you have any questions, please contact Andrea Jones at our Sacramento Office, 1325 J Street, Room 1480, email Andrea.J.Jones@usace.army.mil, or telephone 916-557-7745. You may also use our website: www.spk.usace.army.mil/regulatory.html.

Sincerely,

ORIGINAL SIGNED

Kathleen Dadey
Acting Chief, CA Central Valley South Section

Enclosure

Copy furnished without enclosure:

- ✓ Jim Gibson, Gibson and Skordal, LLC, 2277 Fair Oaks Blvd., Suite 105, Sacramento, California 95825
- U.S. Fish and Wildlife Service, Endangered Species Division, 2800 Cottage Way, Suite W2605, Sacramento, California 95825-3901
- Planning and Community Development Department, County of Sacramento, 827 7th Street, Room 230, Sacramento, California 95814-2406

Copies furnished with wetland delineation map:

William Marshall, Storm Water and Water Quality Certification Unit, Central Valley Regional
Water Quality Control Board, 11020 Sun Center Drive #200, Rancho Cordova, California
95670-6114

Water Quality Certification Unit, California State Water Resources Control Board, 1001 I Street,
Sacramento, California 95814



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

February 6, 2009

Regulatory Division (SPK-2008-00331)

Folsom Heights, LLC
Attn: Mr. Bob Robinson
11415 Hesperian Circle
Gold River, CA 95670

Dear Mr. Robinson:

We are responding to your consultant's request for an approved jurisdictional determination for the Folsom Heights Project. This approximately 189-acre site is located on the Sacramento-El Dorado County line, south of Highway 50 and north of White Rock Road, Township 9 North, Range 8 EAST, Latitude 38.6427° North, Longitude -121.0879° West, near the City of Folsom, in eastern Sacramento County, California.

Based on available information, we concur with the estimate of waters of the United States, as depicted on the June 21, 2006 Centex Homes – Folsom Heights Property drawing prepared by EDAW. Approximately 5.899 acres of waters of the United States, including wetlands, are present within the survey area. These waters are regulated under Section 404 of the Clean Water Act, since they are tributary to Carson Creek.

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. This letter contains an approved jurisdictional determination for your subject site. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR Part 331.

A Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form is enclosed. If you request to appeal this determination you must submit a completed RFA form to the South Pacific Division Office at the following address: Administrative Appeal Review Officer, Army Corps of Engineers, South Pacific Division, CESPDPDS-O, 1455 Market Street, San Francisco, California 94103-1399, Telephone: 415-503-6574, FAX: 415-503-6646.

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the NAP. Should you decide to submit an RFA form, it must be received at the above address by 60 days from the date of this letter. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

You should provide a copy of this letter and notice to all other affected parties, including any individual who has an identifiable and substantial legal interest in the property.

This determination has been conducted to identify the limits of Corps of Engineers' Clean Water Act jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

We appreciate your feedback. At your earliest convenience, please complete our customer survey at http://www.spk.usace.army.mil/customer_survey.html. Your passcode is "conigliaro".

Please refer to identification number SPK-2008-00331 in any correspondence concerning this project. If you have any questions, please contact Lisa Gibson at our Sacramento Office, 1325 J Street, Room 1480, Sacramento California 95814-2922, email lisa.m.gibson2@usace.army.mil, or telephone 916-557-5288. You may also use our website: www.spk.usace.army.mil/regulatory.html.

Sincerely,

Original Signed

Kathleen A. Dadey, PhD
Chief, California South Branch

Enclosure(s)

Copy Furnished without enclosure(s)

- ✓ Ms. Jana Milliken, Sacramento Valley Branch, Endangered Species Division, U.S. Fish and Wildlife Service, 2800 Cottage Way, Suite W2605, Sacramento, California 95825-3901
- Mr. Paul Jones, U.S. Environmental Protection Agency, Region IX, Wetlands Regulatory Office (WTR-8), 75 Hawthorne Street, San Francisco, California 94105-3901
- Mr. Kent Smith, California Department of Fish and Game, Region 2, 1701 Nimbus Road, Rancho Cordova, California 95670-4599
- Mr. Bill Orme, Storm Water and Water Quality Certification Unit, Central Valley Regional Water Quality Control Board, 11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114
- Ms. Gail Furness de Pardo, City of Folsom, Permitting, Inspections and Planning Department, 50 Natoma Street, Folsom, California 95630-2614
- ✓ Ms. Petra Unger, EDAW, 2022 J Street, Sacramento, CA 95811



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

REPLY TO
ATTENTION OF

February 6, 2009

RECEIVED
FEB 09 2009
FOOTHILL ASSOC.

Regulatory Division (SPK-2006-00035)

MJM Properties, LLC
Attn: Mr. Mike McDougall
1037 Suncrest Lane, Suite 111
El Dorado Hills, CA 95762

Dear Mr. McDougall:

We are responding to your consultant's request for an approved jurisdictional determination for the Folsom South Project. This approximately 1400-acre site is located south of Highway 50, within Sections 9, 10, 15, 16, 17, 20, 21 and 22, Township 9 North, Range 8 East, Latitude 38.6277° North, Longitude - 121.11523° West, MDB&M, near the City of Folsom, in eastern Sacramento County, California.

Based on available information, we concur with the estimate of waters of the United States, as depicted on the January 12, 2009 revised Folsom South Delineated Waters of the U.S. drawing prepared by Foothill Associates. Approximately 29.16 acres of waters of the United States, including wetlands, are present within the survey area. These waters are regulated under Section 404 of the Clean Water Act, since they are tributary to the American River.

The 1.27-acre waters identified as "ditch/canal (non-jurisdictional)" and "pond (non-jurisdictional)" on the above drawing are intrastate isolated waters with no apparent interstate or foreign commerce connection. As such, these waters are not currently regulated by the Corps of Engineers. This disclaimer of jurisdiction is only for Section 404 of the Federal Clean Water Act. Other Federal, State, and local laws may apply to your activities. In particular, you may need authorization from the California State Water Resources Control Board and/or the U.S. Fish and Wildlife Service.

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. This letter contains an approved jurisdictional determination for your subject site. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR Part 331.

A Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form is enclosed. If you request to appeal this determination you must submit a completed RFA form to the South Pacific Division Office at the following address: Administrative Appeal Review Officer, Army Corps of Engineers, South Pacific Division, CESPDPDS-O, 1455 Market Street, San Francisco, California 94103-1399, Telephone: 415-503-6574, FAX: 415-503-6646.

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the NAP. Should you decide to submit an RFA form, it must be received at the above address by 60 days from the date of this letter. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

You should provide a copy of this letter and notice to all other affected parties, including any individual who has an identifiable and substantial legal interest in the property.

This determination has been conducted to identify the limits of Corps of Engineers' Clean Water Act jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

We appreciate your feedback. At your earliest convenience, please complete our customer survey at http://www.spk.usace.army.mil/customer_survey.html. Your passcode is "conigliaro".

Please refer to identification number SPK-2006-00035 in any correspondence concerning this project. If you have any questions, please contact Lisa Gibson at our Sacramento Office, 1325 J Street, Room 1480, Sacramento California 95814-2922, email lisa.m.gibson2@usace.army.mil, or telephone 916-557-5288. You may also use our website: www.spk.usace.army.mil/regulatory.html.

Sincerely,

Original Signed

Kathleen A. Dadey, PhD
Chief, California South Branch

Enclosure(s)

Copy Furnished without enclosure(s)

Ms. Jana Milliken, Sacramento Valley Branch, Endangered Species Division, U.S. Fish and Wildlife Service, 2800 Cottage Way, Suite W2605, Sacramento, California 95825-3901

Mr. Paul Jones, U.S. Environmental Protection Agency, Region IX, Wetlands Regulatory Office (WTR-8), 75 Hawthorne Street, San Francisco, California 94105-3901

Mr. Kent Smith, California Department of Fish and Game, Region 2, 1701 Nimbus Road, Rancho Cordova, California 95670-4599

Mr. Bill Orme, Storm Water and Water Quality Certification Unit, Central Valley Regional Water Quality Control Board, 11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114

Ms. Gail Furness de Pardo, City of Folsom, Permitting, Inspections and Planning Department, 50 Natoma Street, Folsom, California 95630-2614

Ms. Francine Dunn, EDAW, 2022 J Street, Sacramento, CA 95811

✓ Mr. Ken D. Whitney, Foothill Associates, 590 Menlo Drive, Suite 1, Rocklin, CA 95765



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

February 6, 2009

RECEIVED

FEB 09 2009

ECORP Consulting

Folsom 138

2007-212

BTG/CWH/FILE/REG
↓
brlg.

Regulatory Division (SPK-2008-00326)

Folsom White Rock Investors, LLC.
Attn: Mr. Brian Cutting
111 Woodmere Drive, Suite 190
Folsom, CA 95630

Dear Mr. Cutting:

We are responding to your consultant's request for an approved jurisdictional determination for the Folsom 138 Project. This approximately 138-acre site is located at the northeast corner of the intersection of Placerville Road and White Rock Road in Section 15, Township 9 North, Range 8 East, MDBM, Latitude 38.6356° North, Longitude -121.0878° West, near the City of Folsom, Sacramento County, California.

Based on available information, we concur with the estimate of waters of the United States, as depicted on the February 20, 2008 Folsom 138 Wetland Delineation drawing prepared by ECORP Consultin, Inc. Approximately 2.533-acres of waters of the United States, including wetlands, are present within the survey area. These waters are regulated under Section 404 of the Clean Water Act since they are tributary to Alder Creek.

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. This letter contains an approved jurisdictional determination for your subject site. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR Part 331.

A Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form is enclosed. If you request to appeal this determination you must submit a completed RFA form to the South Pacific Division Office at the following address: Administrative Appeal Review Officer, Army Corps of Engineers, South Pacific Division, CESP-D-PDS-O, 1455 Market Street, San Francisco, California 94103-1399, Telephone: 415-503-6574, FAX: 415-503-6646.

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the NAP. Should you decide to submit an RFA form, it must be received at the above address by 60 days from the date of this letter. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

You should provide a copy of this letter and notice to all other affected parties, including any individual who has an identifiable and substantial legal interest in the property.

This determination has been conducted to identify the limits of Corps of Engineers' Clean Water Act jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

We appreciate your feedback. At your earliest convenience, please complete our customer survey at http://www.spk.usace.army.mil/customer_survey.html. Your passcode is "conigliaro".

Please refer to identification number SPK-2008-00326 in any correspondence concerning this project. If you have any questions, please contact Lisa Gibson at our Sacramento Office, 1325 J Street, Room 1480, Sacramento California 95814-2922, email lisa.m.gibson2@usace.army.mil, or telephone 916-557-5288. You may also use our website: www.spk.usace.army.mil/regulatory.html.

Sincerely,

Original Stamp

Kathleen A. Dadey, PhD
Chief, California South Branch

Enclosure(s)

Copy Furnished without enclosure(s)

Ms. Jana Milliken, Sacramento Valley Branch, Endangered Species Division, U.S. Fish and Wildlife Service, 2800 Cottage Way, Suite W2605, Sacramento, California 95825-3901

Mr. Paul Jones, U.S. Environmental Protection Agency, Region IX, Wetlands Regulatory Office (WTR-8), 75 Hawthorne Street, San Francisco, California 94105-3901

Mr. Kent Smith, California Department of Fish and Game, Region 2, 1701 Nimbus Road, Rancho Cordova, California 95670-4599

Mr. Bill Orme, Storm Water and Water Quality Certification Unit, Central Valley Regional Water Quality Control Board, 11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114

Ms. Gail Furness de Pardo, City of Folsom, Permitting, Inspections and Planning Department, 50 Natoma Street, Folsom, California 95630-2614

Ms. Francine Dunn, EDAW, 2022 J Street, Sacramento, CA 95811

✓ Mr. Bjorn Gregerson, ECORP Consulting, Inc., 2525 Warren Drive, Rocklin, CA 95677



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

REPLY TO
ATTENTION OF

February 6, 2009

Regulatory Division (SPK-2007-01072)

The Hodgson Company
Attn: Mr. John Hodgson
7700 College Town Drive, Suite 220
Sacramento, CA 95826

Dear Mr. Hodgson:

We are responding to your consultant's request for an approved jurisdictional determination for the Javanifard and Zhargami Project. This approximately 30-acre site is located south of Highway 50 and north of White Rock Road, between Prairie City Road and Scott Road, in Section 17, Township 9 North, Range 8 East, MDB&M, near the City of Folsom, in Sacramento County, California; Latitude 38.6292° North, Longitude -121.1319° West.

Based on available information, we concur with the estimate of waters of the United States, as depicted on the April 26, 2007 Javanifard and Zarghami Parcel drawing prepared by ECORP Consulting, Inc. Approximately 2.824 acres of waters of the United States, including wetlands, are present within the survey area. These waters are regulated under Section 404 of the Clean Water Act, since they are tributary to Alder Creek.

The 0.006-acre waters identified as "SW-1", "SW-2" and "VP-1" on the above drawing are intrastate isolated waters with no apparent interstate or foreign commerce connection. As such, these waters are not currently regulated by the Corps of Engineers. This disclaimer of jurisdiction is only for Section 404 of the Federal Clean Water Act. Other Federal, State, and local laws may apply to your activities. In particular, you may need authorization from the California State Water Resources Control Board and/or the U.S. Fish and Wildlife Service.

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. This letter contains an approved jurisdictional determination for your subject site. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR Part 331.

A Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form is enclosed. If you request to appeal this determination you must submit a completed RFA form to the South Pacific Division Office at the following address: Administrative Appeal Review Officer, Army Corps of Engineers, South Pacific Division, CESP-D-PDS-O, 1455 Market Street, San Francisco, California 94103-1399, Telephone: 415-503-6574, FAX: 415-503-6646.

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the NAP. Should you decide to submit an RFA form, it must be received at the above address by 60 days from the date of this letter. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

You should provide a copy of this letter and notice to all other affected parties, including any individual who has an identifiable and substantial legal interest in the property.

This determination has been conducted to identify the limits of Corps of Engineers' Clean Water Act jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

We appreciate your feedback. At your earliest convenience, please complete our customer survey at http://www.spk.usace.army.mil/customer_survey.html. Your passcode is "conigliaro".

Please refer to identification number SPK-2007-01072 in any correspondence concerning this project. If you have any questions, please contact Lisa Gibson at our Sacramento Office, 1325 J Street, Room 1480, Sacramento California 95814-2922, email lisa.m.gibson2@usace.army.mil, or telephone 916-557-5288. You may also use our website: www.spk.usace.army.mil/regulatory.html.

Sincerely,

Kathleen A. Dadey, PhD
Chief, California South Branch

Enclosure(s)

Copy Furnished without enclosure(s)

Ms. Jana Milliken, Sacramento Valley Branch, Endangered Species Division, U.S. Fish and Wildlife Service, 2800 Cottage Way, Suite W2605, Sacramento, California 95825-3901

Mr. Paul Jones, U.S. Environmental Protection Agency, Region IX, Wetlands Regulatory Office (WTR-8), 75 Hawthorne Street, San Francisco, California 94105-3901

Mr. Kent Smith, California Department of Fish and Game, Region 2, 1701 Nimbus Road, Rancho Cordova, California 95670-4599

Mr. Bill Orme, Storm Water and Water Quality Certification Unit, Central Valley Regional Water Quality Control Board, 11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114

Ms. Gail Furness de Pardo, City of Folsom, Permitting, Inspections and Planning Department, 50 Natoma Street, Folsom, California 95630-2614

Ms. Francine Dunn, EDAW, 2022 J Street, Sacramento, CA 95811

✓ Mr. Dustin Brown, ECORP Consulting, Inc., 2525 Warren Drive, Rocklin, CA 95677

RECEIVED

FEB 10 2009

ECORP Consulting

FOLSOM SAG

2005-429

DRB/BTG/RO/FILE/REG
↓
orig.



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

REPLY TO
ATTENTION OF

July 11, 2008

Regulatory Division (SPK-2006-0538)

Mr. David Hatch
GenCorp Realty Investments
620 Coolidge Drive, Suite 100
Folsom, California 95630

Dear Mr. Hatch:

We are responding to your consultant's request for an approved jurisdictional determination for the Prairie City Road Business Park Project. This approximately 66-acre site is located south of Highway 50, west of Prairie City Road, and south of the City of Folsom in eastern Sacramento County, California, Township 9 North, Range 7 East, MDB&M, Latitude 38.63889° North, Longitude 121.1525° West.

Based on available information, we concur with the estimate of waters of the United States, as depicted on the May 19, 2008 wetland delineation drawing prepared by ECORP Consulting, Inc. Approximately 4.107 acres of waters of the United States, including wetlands, are present within the survey area. These waters are regulated under Section 404 of the Clean Water Act, since they are tributary to or adjacent to tributaries of Alder Creek.

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. This letter contains an approved jurisdictional determination for your subject site. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR Part 331.

A Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form is enclosed. If you request to appeal this determination you must submit a completed RFA form to the South Pacific Division Office at the following address: Administrative Appeal Review Officer, Army Corps of Engineers, South Pacific Division, CESPDPDS-O, 1455 Market Street, San Francisco, California 94103-1399, Telephone: 415-503-6574, FAX: 415-503-6646.

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the NAP. Should you decide to submit an RFA form, it must be received at the above address by 60 days from the date of this letter. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

You should provide a copy of this letter and notice to all other affected parties, including any individual who has an identifiable and substantial legal interest in the property.

This determination has been conducted to identify the limits of Corps of Engineers' Clean Water Act jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

We appreciate your feedback. At your earliest convenience, please complete our customer survey at http://www.spk.usace.army.mil/customer_survey.html. Your passcode is "conigliaro".

Please refer to identification number SPK-2006-00561 in any correspondence concerning this project. If you have any questions, please contact Lisa M. Gibson at our Sacramento Office, 1325 J Street, Room 1480, Sacramento, California 95814-2922, email lisa.m.gibson2@usace.army.mil, or telephone 916-557-5288. You may also use our website: www.spk.usace.army.mil/regulatory.html.

Sincerely,
Original Signed

Kathleen A. Dadey, PhD.
Chief, California South Branch

Enclosure(s)

Copy furnished without enclosure(s):

Ms. Daria Snider, ECORP Consulting, Inc., 2525 Warren Drive, Rocklin, California 95677

Ms. Francine Dunn, EDAW, Inc., 2022 J Street, Sacramento, California 95811

Paul Jones, U.S. Environmental Protection Agency, Region IX, Wetlands Regulatory Office (WTR-8), 75 Hawthorne Street, San Francisco, California 94105-3901

William Marshall, Storm Water and Water Quality Certification Unit, Central Valley Regional Water Quality Control Board, 11020 Sun Center Drive #200, Rancho Cordova, California 95670-6614

Gail Furness de Pardo, City of Folsom, Permitting, Inspections and Planning Department, 50 Natoma Street, Folsom, California 95630-2614

RECEIVED

JUL 15 2008

ECORP Consulting
Glencorp, Folsom 502-
PRAIRIE CITY

2005-461.1

DMS/BSE/CWH/HM/FILE/REG
via



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

REPLY TO
ATTENTION OF

July 11, 2008

Regulatory Division (SPK-2006-00561)

Mr. David Hatch
GenCorp Realty Investments
620 Coolidge Drive, Suite 100
Folsom, California 95630-3181

Dear Mr. Hatch:

We are responding to your consultant's request for an approved jurisdictional determination for the Folsom 560 Project. This approximately 560-acre site is located east of Prairie City Road, north of White Rock Road, south of the City of Folsom, in eastern Sacramento County, California, within Sections 18 and 19, Township 9 North, Range 8 East, MDB&M, Latitude 38.6236° North, Longitude 121.1397° West.

Based on available information, we concur with the estimate of waters of the United States, as depicted on the May 23, 2008 drawing prepared by ECORP Consulting, Inc. Approximately 10.483 acres of waters of the United States, including wetlands, are present within the survey area. These waters are regulated under Section 404 of the Clean Water Act, since they are tributaries to or adjacent to tributaries of Alder Creek, Coyote Creek and Buffalo Creek.

The 0.012-acre waters identified as "VP-ISO-1, VP-ISO-2, VP-ISO-3, and SW-ISO-1" on the above drawing is an intrastate isolated water with no apparent interstate or foreign commerce connection. As such, this water is not currently regulated by the Corps of Engineers. This disclaimer of jurisdiction is only for Section 404 of the Federal Clean Water Act. Other Federal, State, and local laws may apply to your activities. In particular, you may need authorization from the California State Water Resources Control Board and/or the U.S. Fish and Wildlife Service.

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. This letter contains an approved jurisdictional determination for your subject site. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR Part 331.

A Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form is enclosed. If you request to appeal this determination you must submit a completed RFA form to the South Pacific Division Office at the following address: Administrative Appeal Review

Officer, Army Corps of Engineers, South Pacific Division, CESPDPDS-O, 1455 Market Street, San Francisco, California 94103-1399, Telephone: 415-503-6574, FAX: 415-503-6646.

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the NAP. Should you decide to submit an RFA form, it must be received at the above address by 60 days from the date of this letter. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

You should provide a copy of this letter and notice to all other affected parties, including any individual who has an identifiable and substantial legal interest in the property.

This determination has been conducted to identify the limits of Corps of Engineers' Clean Water Act jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

We appreciate your feedback. At your earliest convenience, please complete our customer survey at http://www.spk.usace.army.mil/customer_survey.html. Your passcode is "conigliaro".

Sincerely,
Original Signed

Kathleen A. Dadey, PhD.
Chief, California South Branch

Enclosure(s)

Copy furnished without enclosure(s):

- Ms. Daria Snider, Ecorp Consulting, Inc., 2525 Warren Drive, Rocklin, California 95677
- Ms. Francine Dunn, EDAW Inc., 2022 J Street, Sacramento, California 95811
- Paul Jones, U.S. Environmental Protection Agency, Region IX Wetlands Regulatory Office (WTR-8), 75 Hawthorne Street, San Francisco, California 94105-3901
- William Marshall, Storm Water and Water Quality Certification Unit, Central Valley Regional Water Quality Control Board, 11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114
- Ms. Gail Furness de Pardo, City of Folsom, Permitting, Inspections and Planning Department, 50 Natoma Street, Folsom, California 95630-2614

ATTACHMENT B

Land Use and Cost Tables

Alternatives 1-4

- No Federal Action**
- Centralized Development**
- Resource Impact Minimization**
- Reduced Hillside Development**

**Folsom Plan Area Specific Plan
Cost Summary for Project Alternatives**

| ALTERNATIVE | NET DEVELOPABLE ACRES | IMPACTS TO WATER OF THE US (ACRES) | BACKBONE IMPROVEMENT (\$ / net acre) | IN - TRACT DEVELOPMENT (\$ / net acre) | TOTAL BACKBONE + IN - TRACT (\$ / net acre) | ALTERNATIVE DIFFERENTIAL TO PROPOSED PROJECT (\$ / net acre) | PERCENT (%) DIFFERENTIAL TO PROPOSED PROJECT |
|--|-----------------------|------------------------------------|--------------------------------------|--|---|--|--|
| Alternative 1: No Federal Action | 1,874.1 | 0.000 | 635,000 | 452,000 | 1,087,000 | 506,000 | 87% |
| Alternative 2: Centralized Development | 1,889.5 | 37.052 | 288,000 | 348,000 | 636,000 | 55,000 | 9% |
| Alternative 3: Resource Impact Minimization | 1,923.2 | 26.468 | 463,000 | 400,000 | 863,000 | 282,000 | 49% |
| Alternative 4: Reduced Hillside Development | 2,290.5 | 42.692 | 241,000 | 343,000 | 584,000 | 3,000 | 1% |
| Alternative 5: Proposed Project | 2,287.3 | 39.499 | 247,000 | 334,000 | 581,000 | 0 | N/A |

FOLSOM SPECIFIC PLAN AREA
Development Alternatives Cost Summary

Development Scenario

| DESCRIPTION | Proposed Project Dev. | No Fod Action Dev. | Centralized Dev. | Reduced Hillside Dev. | Resource Impact Minimize Dev. |
|---|------------------------|------------------------|------------------------|------------------------|-------------------------------|
| Gross Developable Area (Acres) | 3510.4 | 3502.7 | 3502.7 | 3502.7 | 3502.7 |
| Net Developable Area (Acres) | 2287.3 | 1,874.3 | 1889.4 | 2290.2 | 1923.1 |
| Major and Secondary Roadway Improvements | \$215,239,263 | \$190,941,000 | \$205,657,000 | \$212,092,000 | \$203,722,000 |
| Signals at Intersections | \$6,379,000 | \$6,379,000 | \$6,379,000 | \$6,379,000 | \$6,379,000 |
| Interchanges/Hwy 50 Improvements | \$54,250,000 | \$54,250,000 | \$54,250,000 | \$54,250,000 | \$54,250,000 |
| Intract Bridges | \$53,960,250 | \$136,890,000 | \$52,650,000 | \$26,426,250 | \$50,017,500 |
| Causeway Bridges | \$0 | \$569,772,000 | \$0 | \$0 | \$362,002,750 |
| Bore and Jack | \$0 | \$13,777,000 | \$0 | \$0 | \$11,080,000 |
| Sewer Improvements | \$22,401,000 | \$21,653,000 | \$16,182,000 | \$21,063,000 | \$19,362,000 |
| Storm Drain Improvements | \$21,586,000 | \$21,009,000 | \$31,052,000 | \$42,557,000 | \$21,017,000 |
| Water Improvements | \$131,765,000 | \$116,240,000 | \$120,529,000 | \$129,515,000 | \$113,091,000 |
| Diffuse Water Improvements (est.) | \$59,320,000 | \$59,320,000 | \$59,320,000 | \$59,320,000 | \$59,320,000 |
| SUBTOTAL BACKBONE INFRASTRUCTURE | \$563,907,513 | \$1,100,240,000 | \$545,019,000 | \$552,202,250 | \$890,071,250 |
| Intract Development Cost (includes 20% contingency + 15% soft cost) | \$764,444,250 | \$348,636,300 | \$666,644,050 | \$785,943,000 | \$769,267,800 |
| TOTAL COST | \$1,328,351,763 | \$2,036,876,300 | \$1,211,663,050 | \$1,338,145,250 | \$1,659,339,050 |
| PER ACRE COSTS | | | | | |
| Backbone Infrastructure Cost Per Developable Acre (nearest 1000) | \$247,000 | \$636,000 | \$288,000 | \$241,000 | \$463,000 |
| Total Intract Development Cost Per Developable Acre (nearest 1000) | \$334,000 | \$452,000 | \$340,000 | \$343,000 | \$400,000 |
| Total Cost Per Developable Acre (nearest 1000) | \$581,000 | \$1,087,000 | \$628,000 | \$584,000 | \$863,000 |
| Delta Total Cost Per Developable Acre (nearest 1000) | - | \$506,000 | \$55,000 | \$3,000 | \$202,000 |
| Percent Difference per Developable Acre from Proposed Project | - | 187% | 10% | 10% | 14% |

FOLSOM SPECIFIC PLAN AREA
Development Alternatives Cost Summary

Development Scenario

| DESCRIPTION | Development Scenario | | | Resource Impact Minimize Dev. | |
|---|--------------------------|------------------------|------------------------|----------------------------------|--------------------------|
| | Proposed Project Dev. | No Fed Action Dev. | Centralized Dev. | | Reduced Hillside Dev. |
| Gross Developable Area (Acres) | 3510.4 | 3502.7 | 3502.7 | 3502.7 | 3502.7 |
| Not Developable Area (Acres) | 2287.3 | 1,074.3 | 1889.4 | 2290.2 | 1923.1 |
| Major and Secondary Roadway Improvements | \$215,238,263 | \$190,941,000 | \$205,657,000 | \$212,892,000 | \$203,722,000 |
| Signals at Intersections | \$6,379,000 | \$6,379,000 | \$6,379,000 | \$6,379,000 | \$6,379,000 |
| Interchanges/HWY 50 Improvements | \$54,250,000 | \$54,250,000 | \$54,250,000 | \$54,250,000 | \$54,250,000 |
| Intract Bridges | \$53,966,250 | \$136,090,000 | \$52,650,000 | \$26,426,250 | \$50,017,500 |
| Causeway Bridges | \$0 | \$568,772,000 | \$0 | \$0 | \$352,032,750 |
| Bore and Jack | \$0 | \$13,777,000 | \$0 | \$0 | \$11,880,000 |
| Sewer Improvements | \$22,401,000 | \$21,663,000 | \$16,182,000 | \$21,663,000 | \$19,352,000 |
| Storm Drain Improvements | \$21,588,000 | \$21,008,000 | \$31,052,000 | \$42,557,000 | \$21,017,000 |
| Water Improvements | \$131,765,000 | \$118,240,000 | \$120,529,000 | \$129,515,000 | \$113,091,000 |
| Offsite Water Improvements (est.) | \$58,320,000 | \$58,320,000 | \$58,320,000 | \$58,320,000 | \$58,320,000 |
| SUBTOTAL BACKBONE INFRASTRUCTURE | \$653,907,913 | \$1,190,240,000 | \$846,019,000 | \$652,202,250 | \$890,071,250 |
| Intract Development Cost (includes 20% contingency + 15% soft cost) | \$764,444,250 | \$946,636,300 | \$666,644,050 | \$785,943,000 | \$769,267,000 |
| TOTAL COST | \$1,328,351,763 | \$2,036,876,300 | \$1,201,663,050 | \$1,338,145,250 | \$1,659,339,050 |
| (PER ACRE COSTS) | | | | | |
| Backbone Infrastructure Cost Per Developable Acre (nearest 1000) | \$247,000 | \$635,000 | \$288,000 | \$241,000 | \$463,000 |
| Total Intract Development Cost Per Developable Acre (nearest 1000) | \$334,000 | \$452,000 | \$348,000 | \$343,000 | \$400,000 |
| Total Cost Per Developable Acre (nearest 1000) | \$581,000 | \$1,087,000 | \$636,000 | \$584,000 | \$863,000 |
| Delta Total Cost Per Developable Acre (nearest 1000) | - | \$506,000 | \$55,000 | \$3,000 | \$282,000 |
| Percent Difference per Developable Acre from Proposed Project | - | 187% | 109% | 101% | 149% |

Alternative 5a

- Proposed Project with Additional Avoidance Areas**

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5a
Proposed Project with Additional Avoidance Areas
Cost Impacts due to Extension of the Wetland Preserve

| Description | Proposed Project | Alternative 5a Project |
|---|----------------------|------------------------|
| Study Area Development Cost | | |
| Single Family - Land Use Area | 112.2 | 97.9 |
| No. of Single Units | 338 | 283 |
| Single Family High Density - Land Use Area | 48.6 | 36.7 |
| No. of Single Family High Density Units | 269 | 196 |
| Regional Commercial Area | 110.8 | 93.6 |
| General Commercial Area | 57.9 | 48.1 |
| SF Development Cost (\$200,000 per acre) | \$22,440,000 | \$19,580,000 |
| SFHD Development Cost (\$275,000 per acre) | \$13,365,000 | \$10,092,500 |
| RC Development Cost (\$250,000 per acre) | \$27,700,000 | \$23,400,000 |
| GC Development Cost (\$250,000 per acre) | \$14,475,000 | \$12,025,000 |
| Sub-total Study Area Development Cost | \$77,980,000 | \$65,097,500 |
| Project Specific One-Time Burdens | | |
| SF Backbone Infrastructure Cost (\$65,980 per unit) | \$22,301,240 | \$22,301,240 |
| SF Public Facilities and Services Cost (\$21,920 per unit) ¹ | \$7,408,960 | \$6,203,360 |
| SFHD Backbone Infrastructure Cost (\$45,380 per unit) | \$12,207,220 | \$12,207,220 |
| SFHD Public Facilities and Services Cost (\$21,920 per unit) ¹ | \$5,896,480 | \$4,296,320 |
| RC Backbone Infrastructure Cost (\$212,770 per acre) | \$23,574,916 | \$23,574,916 |
| RC Public Facilities and Services Cost (\$74,330 per acre) ¹ | \$8,235,764 | \$6,957,288 |
| GC Backbone Infrastructure Cost (\$269,470 per acre) | \$15,602,313 | \$15,602,313 |
| GC Public Facilities and Services Cost (\$74,330 per acre) ¹ | \$4,303,707 | \$3,575,273 |
| Sub-total Project Specific One-Time Burdens Cost | \$99,530,600 | \$94,717,930 |
| Additional Burdens Due to Wetland Preservation | | |
| Additional In-Tract Infrastructure Cost | \$0 | \$41,362,000 |
| Additional Backbone Infrastructure Cost | \$0 | \$23,348,000 |
| Sub-total Add. Burdens Due to Wetland Preservation Cost | \$0 | \$64,710,000 |
| Total Study Area Development Cost | \$177,510,600 | \$224,525,430 |
| Total Study Area Development Cost per Acre | \$538,727 | \$812,615 |
| Total Study Area SF Development Cost | \$60,445,188 | \$79,554,975 |
| Study Area SF Development Cost per Acre | \$538,727 | \$812,615 |
| Study Area SF Development Cost per Unit | \$178,832 | \$281,113 |
| Increased Study Area SF Development Cost per Unit | | \$102,281 |
| Total Study Area SFHD Development Cost | \$26,182,140 | \$29,822,958 |
| Study Area SFHD Development Cost per Acre | \$538,727 | \$812,615 |
| Study Area SFHD Development Cost per Unit | \$97,331 | \$152,158 |
| Increased Study Area SFHD Development Cost per Unit | | \$54,827 |
| Total Study Area RC Development Cost | \$59,690,970 | \$76,060,732 |
| Study Area RC Development Cost per Acre | \$538,727 | \$812,615 |
| Study Area RC Development Cost per SF | \$12 | \$19 |
| Study Area Increased RC Development Cost per SF | | \$6 |
| Total Study Area GC Development Cost | \$31,192,303 | \$39,086,765 |
| Study Area GC Development Cost per Acre | \$538,727 | \$812,615 |
| Study Area GC Development Cost per SF | \$12 | \$19 |
| Study Area Increased GC Development Cost per SF | | \$6 |

¹ Taken from FPASP PFFP. Adjustments to these values are necessary since some of the burdens values are derived by population.

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5a
 Proposed Project with Additional Avoidance Areas
 Cost Impacts due to Extension of the Wetland Preserve

| Land Use Impacts | Dev. Land Use Area (ac) | Land Use Area Lost (ac) | Area Gained (ac) | Dwelling Units Lost | Dwelling Units Gained | Bldg. Sq. Ft. Lost | Bldg. Sq. Ft. Gained |
|---|-------------------------|-------------------------|------------------|---------------------|-----------------------|--------------------|----------------------|
| | | | | | | | |
| Single Family Lot 39 | 112.2 | 14.3 | | 55 | | | |
| Single Family High Density Lot 51 | 24.2 | 5.1 | | 32 | | | |
| Single Family High Density Lot 52 | 5.1 | 0.4 | | 2 | | | |
| Single Family High Density Lot 53 | 19.3 | 6.4 | | 39 | | | |
| General Commercial (FAR = 0.25) Lot 65 | 57.9 | 9.8 | | | | 106,722 | |
| Regional Commercial (FAR = 0.28) Lot 43 | 110.8 | 17.2 | | | | 209,785 | |
| Land Use Impacts Totals | 329.5 | 53.2 | 0.0 | 128 | 0 | 316,507 | 0 |

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5a
 Proposed Project with Additional Avoidance Areas
 Cost Impacts due to Extension of the Wetland Preserve

| Backbone Infrastructure Cost Impacts | Units | Quantity | Unit Cost | Amount |
|--|--------|----------|---------------|-------------------------|
| Scott Road (112' r/w with 6' walks & 2' conc. guard rails on each side) | DSF | 38,400 | \$ 250.00 | \$ 9,600,000.00 |
| Bridge, 128 ft. wide by 300 ft. long = 38,400 DSF | LF | 350 | \$ 500.00 | \$ 175,000.00 |
| Bore & Jack 350 lf of 24-in steel casing (water) | | | | |
| Placerville Road (78' r/w with 6' walks & 2' conc. guard rails on each side) | DSF | 9,400 | \$ 250.00 | \$ 2,350,000.00 |
| Bridge, 94 ft. wide by 100 ft. long = 9,400 DSF | LF | 150 | \$ 500.00 | \$ 75,000.00 |
| Bore & Jack 150 lf of 24-in steel casing (water) | | | | |
| Easton Valley Parkway (122' r/w with 6' walks & 2' conc. guard rails on each side) | DSF | 33,120 | \$ 250.00 | \$ 8,280,000.00 |
| Bridge, 138 ft. wide by 240 ft. long = 33,120 DSF | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Bore & Jack 300 lf of 20-in steel casing (sewer) | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Bore & Jack 300 lf of 24-in steel casing (water) | | | | |
| Street 'E' (40' boc to boc, 10' walk, 6' walk & 2' conc. guard rails on each side) | DSF | 8,400 | \$ 250.00 | \$ 2,100,000.00 |
| Bridge, 60 ft. wide by 140 ft. long = 8,400 DSF | LF | 200 | \$ 500.00 | \$ 100,000.00 |
| Bore & Jack 200 lf of 42-in steel casing (sewer) | LF | 200 | \$ 500.00 | \$ 100,000.00 |
| Bore & Jack 200 lf of 20-in steel casing (water) | | | | |
| Detention Basins | | | | |
| Alder Creek Detention Basin 5 (East Location) | EA | 1 | \$ 118,000.00 | \$ 118,000.00 |
| Additional 42" Outfall Structure | ac-ft. | 6 | \$ 25,000.00 | \$ 150,000.00 |
| Additional Excavation | | | | |
| Backbone Infrastructure Cost Impacts Sub-Total | | | | \$ 23,348,000.00 |

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5a
Proposed Project with Additional Avoidance Areas
Cost Impacts due to Extension of the Wetland Preserve

| In-Tract Infrastructure Impacts | Units | Quantity | Unit Cost | Amount |
|--|-------|----------|---------------|-------------------------|
| In-Tract Development/Additional Cost | | | | |
| Lot 39 - Single Family | | | | |
| Increase Development Cost | ac | 22 | \$ 50,000.00 | \$ 1,090,000.00 |
| Bridge, 46 ft. wide by 100 ft. long = 4,600 DSF | DSF | 4,600 | \$ 250.00 | \$ 1,150,000.00 |
| Bore & Jack 200 lf of 18-in steel casing (water) | LF | 200 | \$ 500.00 | \$ 100,000.00 |
| Additional Sewer Pump Station Capacity | LS | 1.0 | \$ 100,000.00 | \$ 100,000.00 |
| Additional 8-inch sewer force main | LF | 500 | \$ 144.00 | \$ 72,000.00 |
| Lot 43 - Regional Commercial | | | | |
| Pedestrian Bridge, 20 ft. wide by 190 ft. long = 3,800 DSF | DSF | 3,800 | \$ 100.00 | \$ 380,000.00 |
| Pedestrian Bridge, 20 ft. wide by 170 ft. long = 3,400 DSF | DSF | 3,400 | \$ 100.00 | \$ 340,000.00 |
| Pedestrian Bridge, 20 ft. wide by 170 ft. long = 3,400 DSF | DSF | 3,400 | \$ 100.00 | \$ 340,000.00 |
| Bridge, 70 ft. wide by 190 ft. long = 13,300 DSF | DSF | 13,300 | \$ 250.00 | \$ 3,325,000.00 |
| Bridge, 70 ft. wide by 170 ft. long = 11,900 DSF | DSF | 11,900 | \$ 250.00 | \$ 2,975,000.00 |
| Bore & Jack 300 lf of 18-in steel casing (sewer) | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Bore & Jack 300 lf of 18-in steel casing (water) | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Parking Structure, North-West Corner | Stall | 625 | \$ 20,000.00 | \$ 12,500,000.00 |
| Parking Structure, North-East Corner | Stall | 625 | \$ 20,000.00 | \$ 12,500,000.00 |
| Lot 65 - General Commercial | | | | |
| Bridge, 70 ft. wide by 110 ft. long = 7,700 DSF | DSF | 7,700 | \$ 250.00 | \$ 1,925,000.00 |
| Bridge, 58 ft. wide by 80 ft. long = 4,640 DSF | DSF | 4,640 | \$ 250.00 | \$ 1,160,000.00 |
| Bridge, 58 ft. wide by 190 ft. long = 11,020 DSF | DSF | 11,020 | \$ 250.00 | \$ 2,755,000.00 |
| Bore & Jack 200 lf of 18-in steel casing (sewer) | LF | 200 | \$ 500.00 | \$ 100,000.00 |
| Bore & Jack 250 lf of 18-in steel casing (water) | LF | 250 | \$ 500.00 | \$ 125,000.00 |
| Bore & Jack 250 lf of 18-in steel casing (water) | LF | 250 | \$ 500.00 | \$ 125,000.00 |
| In-Tract Infrastructure Cost Impacts Sub-Total | | | | \$ 41,362,000.00 |
| Total Infrastructure Cost Impacts | | | | \$ 64,710,000.00 |

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5b
Proposed Project with Additional Avoidance through Mall Site to Highway 50
Cost Impacts due to Extension of the Wetland Preserve

| Description | Proposed Project | Alternative 5b Project |
|---|----------------------|------------------------|
| Study Area Development Cost | | |
| SFHD Land Use Area | 48.6 | 36.7 |
| No. of SFHD Units | 269 | 196 |
| Regional Commercial Area | 110.8 | 93.6 |
| General Commercial Area | 57.9 | 48.1 |
| SFHD Development Cost (\$275,000 per acre) | \$13,365,000 | \$10,092,500 |
| RC Development Cost (\$250,000 per acre) | \$27,700,000 | \$23,400,000 |
| GC Development Cost (\$250,000 per acre) | \$14,475,000 | \$12,025,000 |
| Sub-total Study Area Development Cost | \$55,540,000 | \$45,517,500 |
| Project Specific One-Time Burdens | | |
| SFHD Backbone Infrastructure Cost (\$45,380 per unit) | \$12,207,220 | \$12,207,220 |
| SFHD Public Facilities and Services Cost (\$21,920 per unit) ¹ | \$5,896,480 | \$4,296,320 |
| RC Backbone Infrastructure Cost (\$212,770 per acre) | \$23,574,916 | \$19,915,272 |
| RC Public Facilities and Services Cost (\$74,330 per acre) ¹ | \$8,235,764 | \$6,957,288 |
| GC Backbone Infrastructure Cost (\$269,470 per acre) | \$15,602,313 | \$12,961,507 |
| GC Public Facilities and Services Cost (\$74,330 per acre) ¹ | \$4,303,707 | \$3,575,273 |
| Additional Burdens Due to Wetland Preservation | | |
| Additional Development Cost | \$0 | \$38,850,000 |
| Additional Infrastructure Cost | \$0 | \$23,348,000 |
| Sub-total One-time Burdens and Wetland Preservation Cost | \$69,820,400 | \$122,110,880 |
| Total Study Area Development Cost | \$125,360,400 | \$167,628,380 |
| Total Study Area Development Cost per Acre | \$576,900 | \$939,621 |
| Total Study Area SFHD Development Cost | \$28,037,347 | \$34,484,089 |
| Study Area SFHD Development Cost per Acre | \$576,900 | \$939,621 |
| Study Area SFHD Development Cost per Unit | \$104,228 | \$175,939 |
| Increased Study Area SFHD Development Cost per Unit | | \$71,711 |
| Total Study Area RC Development Cost | \$63,920,535 | \$87,948,522 |
| Study Area RC Development Cost per Acre | \$576,900 | \$939,621 |
| Study Area RC Development Cost per SF | \$13 | \$22 |
| Study Area Increased RC Development Cost per SF | | \$8 |
| Total Study Area GC Development Cost | \$33,402,518 | \$45,195,768 |
| Study Area GC Development Cost per Acre | \$576,900 | \$939,621 |
| Study Area GC Development Cost per SF | \$13 | \$22 |
| Study Area Increased GC Development Cost per SF | | \$8 |

¹ Taken from FPASP PFFP. Adjustments to these values are necessary since some of the burdens values are derived by population.

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5b

Proposed Project with Additional Avoidance Through Mall Site to Highway 50
 Cost Impacts due to Extension of the Wetland Preserve

| Land Use Impacts | Dev. Land Use Area (ac) | | Land Use Area Gained (ac) | | Dwelling Units | | Bldg. Sq. Ft. | |
|----------------------------------|-------------------------|-------------|---------------------------|------------|----------------|----------------|---------------|----------|
| | Area (ac) | Lost (ac) | Area Gained (ac) | Units Lost | Units Gained | Lost | Gained | |
| Single Family High Density | | | | | | | | |
| Lot 51 | 24.2 | 5.1 | | 32 | | | | |
| Lot 52 | 5.1 | 0.4 | | 2 | | | | |
| Lot 53 | 19.3 | 6.4 | | 39 | | | | |
| General Commercial (FAR = 0.25) | | | | | | | | |
| Lot 65 | 57.9 | 9.8 | | | | 106,722 | | |
| Regional Commercial (FAR = 0.28) | | | | | | | | |
| Lot 43 | 110.8 | 17.2 | | | | 209,785 | | |
| Open Space | | | | | | | | |
| Lot 77 | | | 5.5 | | | | | |
| Lot 53A | | | 6.4 | | | | | |
| Lot 43A | | | 17.2 | | | | | |
| Lot 65A | | | 9.8 | | | | | |
| Land Use Impacts Totals | 217.3 | 38.9 | 38.9 | 73 | 0 | 316,507 | 0 | 0 |

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5b
Proposed Project with Additional Avoidance Through Mall Site to Highway 50
Cost Impacts due to Extension of the Wetland Preserve

| Backbone Infrastructure Cost Impacts | Units | Quantity | Unit Cost | Amount |
|---|-----------------|----------------------|-------------------------------------|---|
| Scott Road (112' r/w with 6' walks & 2' conc. guard rails on each side) Bridge, 128 ft. wide by 300 ft. long = 38,400 DSF Bore & Jack 350 lf of 24-in steel casing (water) | DSF LF | 38,400 350 | \$ 250.00 \$ 500.00 | \$ 9,600,000.00 \$ 175,000.00 |
| Placerville Road (78' r/w with 6' walks & 2' conc. guard rails on each side) Bridge, 94 ft. wide by 100 ft. long = 9,400 DSF Bore & Jack 150 lf of 24-in steel casing (water) | DSF LF | 9,400 150 | \$ 250.00 \$ 500.00 | \$ 2,350,000.00 \$ 75,000.00 |
| Easton Valley Parkway (122' r/w with 6' walks & 2' conc. guard rails on each side) Bridge, 138 ft. wide by 240 ft. long = 33,120 DSF Bore & Jack 300 lf of 20-in steel casing (sewer) Bore & Jack 300 lf of 24-in steel casing (water) | DSF LF LF | 33,120 300 300 | \$ 250.00 \$ 500.00 \$ 500.00 | \$ 8,280,000.00 \$ 150,000.00 \$ 150,000.00 |
| Street 'E' (40' boc to boc, 10' walk, 6' walk & 2' conc. guard rails on each side) Bridge, 60 ft. wide by 140 ft. long = 8,400 DSF Bore & Jack 200 lf of 42-in steel casing (sewer) Bore & Jack 200 lf of 20-in steel casing (water) | DSF LF LF | 8,400 200 200 | \$ 250.00 \$ 500.00 \$ 500.00 | \$ 2,100,000.00 \$ 100,000.00 \$ 100,000.00 |
| Detention Basins Alder Creek Detention Basin 5 (East Location) Additional 42" Outfall Structure Additional Excavation | EA ac-ft. | 1 6 | \$ 118,000.00 \$ 25,000.00 | \$ 118,000.00 \$ 150,000.00 |
| Backbone Infrastructure Cost Impacts Sub-Total | | | | \$ 23,348,000.00 |

**Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5b**

**Proposed Project with Additional Avoidance Through Mall Site to Highway 50
Cost Impacts due to Extension of the Wetland Preserve**

| In-Tract Infrastructure Impacts | Units | Quantity | Unit Cost | Amount |
|--|--------------|-----------------|------------------|-------------------------|
| In-Tract Development Additional Cost | | | | |
| Lot 43 - Regional Commercial | | | | |
| Pedestrian Bridge, 20 ft. wide by 190 ft. long = 3,800 DSF | DSF | 3,800 | \$ 100.00 | \$ 380,000.00 |
| Pedestrian Bridge, 20 ft. wide by 170 ft. long = 3,400 DSF | DSF | 3,400 | \$ 100.00 | \$ 340,000.00 |
| Pedestrian Bridge, 20 ft. wide by 170 ft. long = 3,400 DSF | DSF | 3,400 | \$ 100.00 | \$ 340,000.00 |
| Bridge, 70 ft. wide by 190 ft. long = 13,300 DSF | DSF | 13,300 | \$ 250.00 | \$ 3,325,000.00 |
| Bridge, 70 ft. wide by 170 ft. long = 11,900 DSF | DSF | 11,900 | \$ 250.00 | \$ 2,975,000.00 |
| Bore & Jack 300 lf of 18-in steel casing (sewer) | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Bore & Jack 300 lf of 18-in steel casing (water) | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Parking Structure, North-West Corner | Stall | 625 | \$ 20,000.00 | \$ 12,500,000.00 |
| Parking Structure, North-East Corner | Stall | 625 | \$ 20,000.00 | \$ 12,500,000.00 |
| Lot 65 - General Commercial | | | | |
| Bridge, 70 ft. wide by 110 ft. long = 7,700 DSF | DSF | 7,700 | \$ 250.00 | \$ 1,925,000.00 |
| Bridge, 58 ft. wide by 80 ft. long = 4,640 DSF | DSF | 4,640 | \$ 250.00 | \$ 1,160,000.00 |
| Bridge, 58 ft. wide by 190 ft. long = 11,020 DSF | DSF | 11,020 | \$ 250.00 | \$ 2,755,000.00 |
| Bore & Jack 200 lf of 18-in steel casing (sewer) | LF | 200 | \$ 500.00 | \$ 100,000.00 |
| Bore & Jack 250 lf of 18-in steel casing (water) | LF | 250 | \$ 500.00 | \$ 125,000.00 |
| Bore & Jack 250 lf of 18-in steel casing (water) | LF | 250 | \$ 500.00 | \$ 125,000.00 |
| In-Tract Infrastructure Cost Impacts Sub-Total | | | | \$ 38,850,000.00 |
| Total Infrastructure Cost Impacts | | | | \$ 62,198,000.00 |

**Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5c**
Proposed Project with Additional Avoidance of Drainage through Mall Site to Scott Road
Cost Impacts due to Extension of the Wetland Preserve

| Description | Proposed Project | Alternative 5c Project |
|---|---------------------|------------------------|
| Study Area Development Cost | | |
| SFHD Land Use Area | 48.6 | 36.7 |
| No. of SFHD Units | 269 | 196 |
| Regional Commercial Area | 110.8 | 93.6 |
| SFHD Development Cost (\$275,000 per acre) | \$13,365,000 | \$10,092,500 |
| RC Development Cost (\$250,000 per acre) | \$27,700,000 | \$23,400,000 |
| Sub-total Study Area Development Cost | \$41,065,000 | \$33,492,500 |
| Project Specific One-Time Burdens | | |
| SFHD Backbone Infrastructure Cost (\$45,380 per unit) | \$12,207,220 | \$12,207,220 |
| SFHD Public Facilities and Services Cost (\$21,920 per unit) ¹ | \$5,896,480 | \$4,296,320 |
| RC Backbone Infrastructure Cost (\$212,770 per acre) | \$23,574,916 | \$19,915,272 |
| RC Public Facilities and Services Cost (\$74,330 per acre) ¹ | \$8,235,764 | \$6,957,288 |
| Additional Burdens Due to Wetland Preservation | | |
| Additional Development Cost | \$0 | \$32,660,000 |
| Additional Infrastructure Cost | \$0 | \$11,148,000 |
| Sub-total One-time Burdens and Wetland Preservation Cost | \$49,914,380 | \$87,184,100 |
| Total Study Area Development Cost | \$90,979,380 | \$120,676,600 |
| Total Study Area Development Cost per Acre | \$570,761 | \$926,144 |
| Total Study Area SFHD Development Cost | \$27,739,008 | \$33,989,495 |
| SFHD Study Area Development Cost per Acre | \$570,761 | \$926,144 |
| Study Area SFHD Development Cost per Unit | \$103,119 | \$173,416 |
| Increased Study Area SFHD Development Cost per Unit | | \$70,297 |
| Total Study Area RC Development Cost | \$63,240,372 | \$86,687,105 |
| Study Area RC Development Cost per Acre | \$570,761 | \$926,144 |
| Study Area RC Development Cost per SF | \$13 | \$21 |
| Study Area Increased RC Development Cost per SF | | \$8 |

¹ Taken from FPASP PFFP. Adjustments to these values are necessary since some of the burdens values are derived by population.

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5c
 Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
 Cost Impacts due to Extension of the Wetland Preserve

| Land Use Impacts | Dev. Land Use Area (ac) | | Land Use Area (ac) | | Dwelling | | Bldg. Sq. Ft. | |
|----------------------------------|-------------------------|-------------|--------------------|-------------|------------|--------------|----------------|----------|
| | Area (ac) | Lost (ac) | Area (ac) | Lost (ac) | Units Lost | Units Gained | Lost | Gained |
| Single Family High Density | | | | | | | | |
| Lot 51 | 24.2 | 5.1 | | | 32 | | | |
| Lot 52 | 5.1 | 0.4 | | | 2 | | | |
| Lot 53 | 19.3 | 6.4 | | | 39 | | | |
| Regional Commercial (FAR = 0.28) | | | | | | | 209,785 | |
| Lot 43 | 110.8 | 17.2 | | | | | | |
| Open Space | | | | | | | | |
| Lot 77 | | | | | | | | |
| Lot 53A | | | 5.5 | | | | | |
| Lot 43A | | | 6.4 | | | | | |
| | | | 17.2 | | | | | |
| Land Use Impacts Totals | 159.4 | 29.1 | 29.1 | 29.1 | 73 | 0 | 209,785 | 0 |

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5c
 Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
 Cost Impacts due to Extension of the Wetland Preserve

| Backbone Infrastructure Cost Impacts | Units | Quantity | Unit Cost | Amount |
|--|--------|----------|---------------|-------------------------|
| Easton Valley Parkway (122' r/w with 6' walks & 2' conc. guard rails on each side) | | | | |
| Bridge, 138 ft. wide by 240 ft. long = 33,120 DSF | DSF | 33,120 | \$ 250.00 | \$ 8,280,000.00 |
| Bore & Jack 300 lf of 20-in steel casing (sewer) | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Bore & Jack 300 lf of 24-in steel casing (water) | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Street 'E' (40' boc to boc, 10' walk, 6' walk & 2' conc. guard rails on each side) | | | | |
| Bridge, 60 ft. wide by 140 ft. long = 8,400 DSF | DSF | 8,400 | \$ 250.00 | \$ 2,100,000.00 |
| Bore & Jack 200 lf of 42-in steel casing (sewer) | LF | 200 | \$ 500.00 | \$ 100,000.00 |
| Bore & Jack 200 lf of 20-in steel casing (water) | LF | 200 | \$ 500.00 | \$ 100,000.00 |
| Detention Basins | | | | |
| Alder Creek Detention Basin 5 (East Location) | | | | |
| Additional 42" Outfall Structure | EA | 1 | \$ 118,000.00 | \$ 118,000.00 |
| Additional Excavation | ac-ft. | 6 | \$ 25,000.00 | \$ 150,000.00 |
| Backbone Infrastructure Cost Impacts Sub-Total | | | | \$ 11,148,000.00 |

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5c
 Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
 Cost Impacts due to Extension of the Wetland Preserve

| In-Tract Infrastructure Impacts | Units | Quantity | Unit Cost | Amount |
|--|-------|----------|--------------|-------------------------|
| In-Tract Development Additional Cost | | | | |
| Lot 43 - Regional Commercial | | | | |
| Pedestrian Bridge, 20 ft. wide by 190 ft. long = 3,800 DSF | DSF | 3,800 | \$ 100.00 | \$ 380,000.00 |
| Pedestrian Bridge, 20 ft. wide by 170 ft. long = 3,400 DSF | DSF | 3,400 | \$ 100.00 | \$ 340,000.00 |
| Pedestrian Bridge, 20 ft. wide by 170 ft. long = 3,400 DSF | DSF | 3,400 | \$ 100.00 | \$ 340,000.00 |
| Bridge, 70 ft. wide by 190 ft. long = 13,300 DSF | DSF | 13,300 | \$ 250.00 | \$ 3,325,000.00 |
| Bridge, 70 ft. wide by 170 ft. long = 11,900 DSF | DSF | 11,900 | \$ 250.00 | \$ 2,975,000.00 |
| Bore & Jack 300 lf of 18-in steel casing (sewer) | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Bore & Jack 300 lf of 18-in steel casing (water) | LF | 300 | \$ 500.00 | \$ 150,000.00 |
| Parking Structure, North-West Corner | Stall | 625 | \$ 20,000.00 | \$ 12,500,000.00 |
| Parking Structure, North-East Corner | Stall | 625 | \$ 20,000.00 | \$ 12,500,000.00 |
| In-Tract Infrastructure Cost Impacts Sub-Total | | | | \$ 32,660,000.00 |
| Total Infrastructure Cost Impacts | | | | \$ 43,808,000.00 |

Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5d
Proposed Project with Additional Avoidance of Intermittent
Drainage and Manmade Ditch on Carpenter Ranch
Cost Impacts due to Extension of the Wetland Preserve

| Description | Proposed Project | Alternative 5d Project |
|---|---------------------|---------------------------|
| Study Area Development Cost | | |
| Land Use Area | 112.2 | 97.9 |
| No. of Units | 338 | 287 |
| SF Development Cost (\$200,000 per acre) | \$22,440,000 | \$19,580,000 |
| Sub-total Study Area Development Cost | \$22,440,000 | \$19,580,000 |
| Project Specific One-Time Burdens | | |
| SF Backbone Infrastructure Cost (\$65,980 per unit) | \$22,301,240 | \$22,301,240 |
| SF Public Facilities and Services Cost (\$21,920 per unit) ¹ | \$7,408,960 | \$6,291,040 |
| Additional Burdens Due to Wetland Preservation | | |
| Additional Development Cost | \$0 | \$2,512,000 |
| Additional Infrastructure Cost | \$0 | \$0 |
| Sub-total One-time Burdens and Wetland Preservation Cost | \$29,710,200 | \$31,104,280 |
| Total Study Area Development Cost | \$52,150,200 | \$50,684,280 |
| Total Study Area Development Cost per Acre | \$464,797 | \$517,715 |
| Total Study Area Development Cost per Unit | \$154,291 | \$176,600 |
| Increased Cost per Unit | | \$22,310 |

¹ Taken from FPASP PFFP. Adjustments to these values are necessary since some of the burden values are derived by population.

**Folsom Plan Area Specific Plan
Wetland Preserve Alternative 5d**

Proposed Project with Additional Avoidance of Intermittent
Drainage and Manmade Ditch on Carpenter Ranch
Cost Impacts due to Extension of the Wetland Buffer

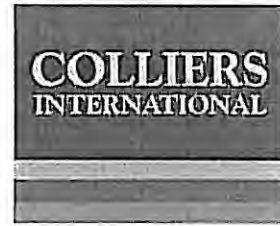
| Land Use Impacts | Dev. Land Use Area (ac) | | Land Use Area Gained (ac) | | Dwelling Units | | Bldg. Sq. Ft. | |
|--------------------------------|-------------------------|-------------|---------------------------|-------------|----------------|------------|---------------|--|
| | Area (ac) | Lost (ac) | Area Gained (ac) | Units Lost | Units Gained | Lost | Gained | |
| Single Family Lot 39 | 112.2 | 14.3 | | 55 | | | | |
| Open Space Lot 30 | | | 14.3 | | | | | |
| Land Use Impacts Totals | 112.2 | 14.3 | 14.3 | 55.0 | 0.0 | 0.0 | 0.0 | |

| In-Tract Infrastructure Impacts | Units | Quantity | Unit Cost | Amount |
|---|-------|----------|---------------|------------------------|
| In-Tract Development Additional Cost | | | | |
| Lot 39 - Single Family | ac | 22 | \$ 50,000.00 | \$ 1,090,000.00 |
| Increase Development Cost | DSF | 4,600 | \$ 250.00 | \$ 1,150,000.00 |
| Bridge, 46 ft. wide by 100 ft. long = 4,600 DSF | LF | 200 | \$ 500.00 | \$ 100,000.00 |
| Bore & Jack 200 lf of 18-in steel casing (water) | LS | 1.0 | \$ 100,000.00 | \$ 100,000.00 |
| Additional Sewer Pump Station Capacity | LF | 500 | \$ 144.00 | \$ 72,000.00 |
| Additional 8-inch sewer force main | | | | |
| In-Tract Infrastructure Cost Impacts Sub-Total | | | | \$ 2,512,000.00 |
| Total Infrastructure Cost Impacts | | | | \$ 2,512,000.00 |

ATTACHMENT C

Letters Regarding Mall Design Requirements

Steven L. Chamberlain
Senior Vice President - Marketing



1610 Arden Way, Suite 240
Sacramento, California 95815-4028
Telephone: 916.929.5999
Facsimile: 916.929.4117
Direct: 916.563.3006
steve.chamberlain@colliers.com
www.colliers.com

June 19, 2009

Folsom SOI Landowners
c/o Tim Kihm
President
FPA Land Development, LLC
4665 Macarthur Court, Suite 200
Newport Beach, CA 92660

Dear Mr. Kihm,

Colliers International (Colliers) is a global real estate brokerage firm offering a wide range of services to owners, developers and tenants. Colliers is a recognized expert in large-scale, regional retail centers, such as the regional mall site in the County of Sacramento, adjacent to Hwy 50 and the City of Folsom. Colliers has a strong, long term presence in Sacramento, and has extensive experience with local commercial centers. As such, Colliers has a strong understanding of site related issues that impact both values and viability of a regional retail center.

Colliers is intimately familiar with the subject mall site and has reviewed the recent request to consider the impacts associated with preserving an above-ground drainage/wetlands preserve corridor through the lower portion of the site. The following are what we believe to be the key impacts:

1. The visibility and access along both Scott Road and Easton Valley Road are crucial elements of the plan and would be significantly constrained by a wetlands preservation corridor.
2. The corridor would separate the southern portion of the development from the rest of the development, causing a reduction in values and hindering the walkability & circulation of the site.
3. The overall size and dimensions of a mall site are crucial to its success. The corridor caused both the effective depth and overall size of the site to fall below what is generally considered viable for a modern regional mall.
4. To make up for some of the loss of site area caused by the corridor, it would require expensive parking structures, bridges, tighter building configurations, and additional costs related to creating and maintaining the wetlands area. These costs would make the site significantly less attractive to a mall developer and the mall itself would not likely be viable.



CMN Inc.
An Independent Member of Colliers International
Commercial Real Estate Offices throughout the Americas, Europe, Middle East, Asia Pacific and Africa

Tim Kihm
June 19, 2009
Page 2 of 2

In summary we believe the proposed wetlands corridor would have a major, if not catastrophic impact on the viability of the regional mall. In our experience, mall developers will not buy a site if there are substantial costs or complications, visibility constraints or limits on development expansion. The proposed wetlands – drainage corridor poses all of these and more.

Sincerely,

COLLIERS INTERNATIONAL

A handwritten signature in black ink, appearing to read "Steve Chamberlain". The signature is fluid and cursive, with the first name "Steve" written in a larger, more prominent script than the last name "Chamberlain".

Steve Chamberlain
Senior Vice President
916-563-3006
E-mail: Steve.Chamberlain@colliers.com



IRVINE • SANTA MONICA • SAN MATEO

May 19, 2009

Tim Kihm
FPA Land Development, LLC
4665 MacArthur Court, Suite 200
Newport Beach, CA 92660

Dear Tim:

RE: The Carpenter Ranch Project Land Use

After reviewing the land use plan for the two retail projects numbered 43 (110 acres) and 65 (58 acres) the following observations and modifications would have to be made to make them feasible for retail uses.

- The drainage proposed cuts off the continuity and flow of both sites.
- The drainage should be rerouted or placed underground.
- The site lines are disrupted by the drainage and placement of the significant outparcels.
- The walk ability is obstructed in both projects by bifurcating them.
- The remainder pieces with the drainage cutting through the developments are unmarketable.
- Water as an amenity is not necessary.
- The cost to mitigate these features is prohibitive.
- The circulation between projects is disrupted and inconsistent with normal retail traffic patterns.
- The parking fields don't flow and serve the retailers properly.

We do like the location and when the market absorption is there these sites will become both feasible and valuable to the communities they serve.

We would look forward to working closely with you developing both sites but would have to have the aforementioned items corrected before seriously considering proceeding with the projects.

Very Truly Yours,

A handwritten signature in black ink that reads 'Laurence Weese'.

Laurence Weese
Director of Acquisitions

17461 Derlan Avenue, Suite 106
Irvine, California 92614
949 270-2400 • Fax 949 644-8631

233 Wilshire Boulevard, Suite 515
Santa Monica, California 90401
310 393-2500 • Fax 310 393-2551

1840 Gateway Drive, Suite 200
San Mateo, California 94404
650 378-1353 • Fax 650 378-1354

www.hopkinsgroup.com



May 12, 2009

Folsom SOI Landowners
c/o Tim Kihm
President
FPA Land Development, LLC
4665 Macarthur Court, Suite 200
Newport Beach, CA 92660

Dear Mr. Kihm,

We have reviewed the exhibits you provided to us regarding the preservation of a 150-200' wide wetlands corridor that would in essence, divide and disjoint the Regional Mall site as currently proposed in the Carpenter Ranch project. With every planning and design commission, we look to achieve for our clients (and each project's stakeholders), the best balance of intelligent, deliberate, and economically feasible design that treads as lightly as practical "on the land" within the context of socially responsible, desirable, and marketable land uses. Within this framework, as the lead Planning and Architectural firm involved in many planning projects, (consisting of thousands of acres of varied land uses throughout the west), we have some thoughts and opinions we would like to submit for your consideration about the practicality and sustainability for the regional mall.

The Folsom SOI Transit Plan identifies the Mall site as an important location for a transit stop. We agree that a transit oriented community amenity, such as a transit stop, is a key element for this community and for the future vision of this region. With the transit stop on the south side of the proposed 150-200' wetland corridor (and a significant portion of shared parking proposed to be where the surface drainage exists now), the separation of this important socio-economic artery from the retail and entertainment portions of the community would, in our opinion, significantly compromise the appropriate balance of sustainability and economic viability by disjointing the compatible land uses.

Similarly, the location of the wetlands corridor would divide a portion of the retail shops and restaurants from the retail anchors and from the majority of the other shops, thus hindering the "walkability" and continuity of the mall site.

In this particular instance, maintaining the surface, wetland preservation corridor appears to possess less desirable benefits than the sustainable, transit-friendly, and walkable environment being created for the community.

Best regards,

Jeffrey DeMure, AIA
President



May 18, 2009

Tim Kihm
President
FPA Land Development
4665 MacArthur Court, Suite 200
Newport Beach, CA 92660

Re: Carpenter Ranch
Folsom, California

Dear Mr. Kihm:

As you are aware, Citivest, Inc. is a commercial developer and management company based in Irvine, California. We have experience in the development and management of regional shopping malls. Per your request, we have reviewed the proposed Land Use Plan and the proposed wetland corridor overlay.

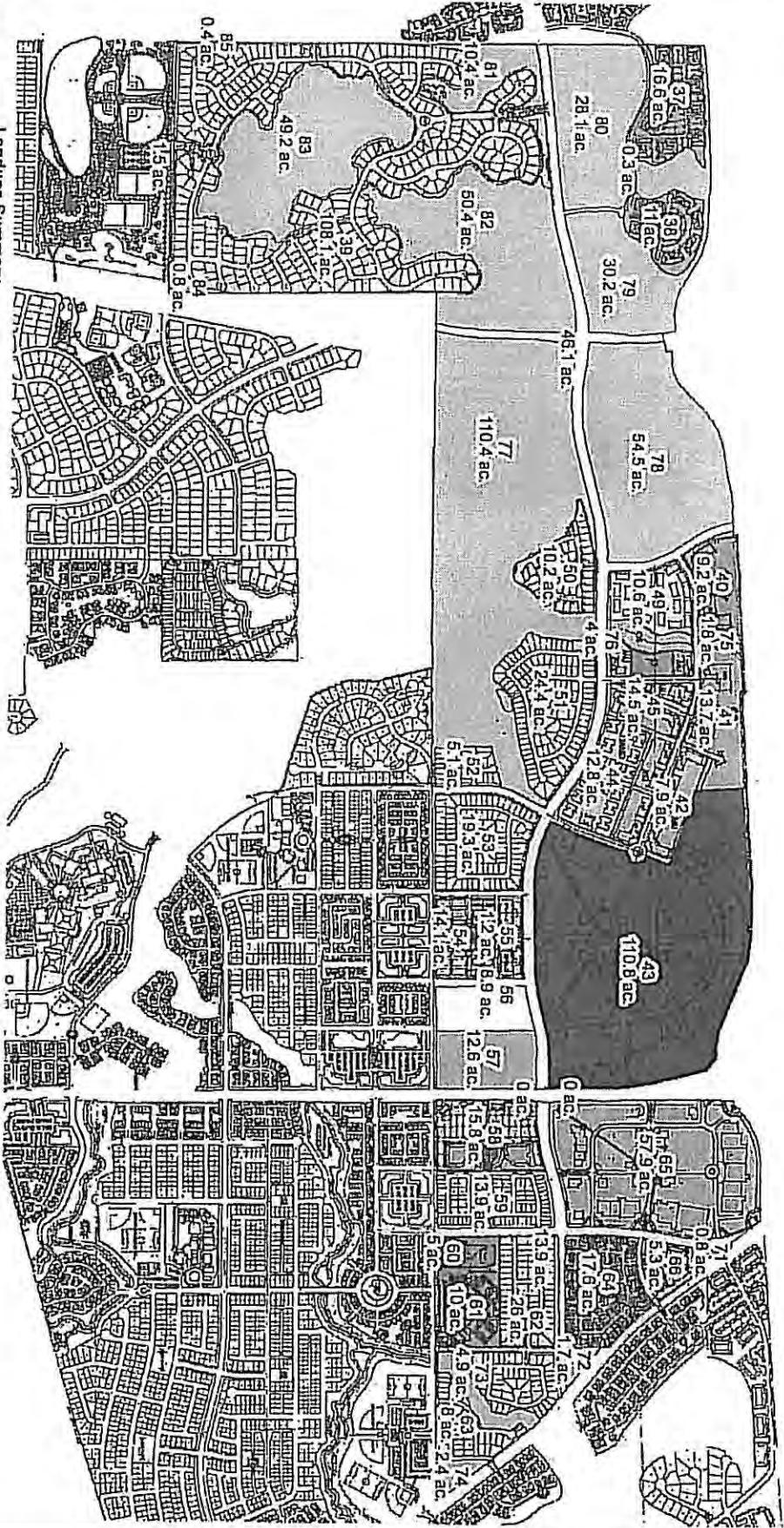
Our review indicates that proposed location of the wetland corridor will have a significant detrimental impact on the Regional Shopping Mall plan for the following reasons:

1. Regional Shopping Malls must front on and be exposed to high traffic volume streets and intersections and the proposed wetland corridor overlay would block such visibility and access.
2. The drainage preserve area would interfere with the circulation and parking requirements of a Regional Shopping Mall at this location.
3. The mitigation measures of bridges crossing the drainage preserve and parking structures to account for lost parking lot area would make the project economically infeasible.

Please feel free to contact me at (949) 474-0440 if any further analysis of this project is necessary.

Yours truly,

Dana Haynes
President



Landuse Summary

| Landuse | Total | Projected DU | Projected Bldg. S.F. |
|-------------|-------|--------------|----------------------|
| GC | 105.3 | | |
| IND/OP | 39.8 | 441 | 1,295,910 |
| MHD | 17.8 | 303 | 618,116 |
| MALD | 33.4 | 234 | |
| MMMD | 12.8 | 454 | 343,253 |
| MU | 38.4 | | |
| OS | 350 | | |
| P | 8.5 | | |
| POP | 10 | | |
| RC | 110.8 | | 1,351,405 |
| RW | 61.8 | | |
| SF | 118.3 | 384 | |
| SFH/D | 82.9 | 457 | |
| Grand Total | 987.5 | 2,273 | 3,508,884 |

Note: Minor discrepancies in areas are due to rounding to the nearest 0.1 acre.



Land Use Areas

Carpenter Ranch

City of Folsom,

California

April 27, 2009

7692.00

McKay & Somps
 CIVIL ENGINEERS, INC.
 5000 GREENSBORO PLAZA, SUITE 100
 FOLSOM, CA 95630

ATTACHMENT D

Drainage Characterization – Carpenter Ranch



Wetland Consultants

GIBSON & SKORDAL, LLC

2277 Fair Oaks Blvd., Suite 105
Sacramento, California 95825
Telephone (916) 569-1830
Facsimile (916) 569-1835

James C. Gibson
Thomas M. Skordal
Karen Shaffer
Ginger E. Fodge
Samuel R. Garcia

DRAINAGE CHARACTERIZATIONS CARPENTER RANCH

The Corps of Engineers requested three drainage areas on Carpenter Ranch be characterized to assist them in evaluating certain areas not being proposed for preservation. Attached are exhibits showing the location of these drainage areas and the location of the photographs. Photographs taken on April 25, 2009, are also attached. A description of each of these drainage areas is provided below.

DRAINAGE AREA 1

Drainage Area 1 is a contour ditch located in the southwest corner of the project area. The ditch was constructed in the 1850's in association with gold mining operations. The upstream limit of the ditch stops at the southern boundary of the project area.

Flow Characteristics: Ephemeral

Width: One to two feet wide

Associated Vegetation: The ditch bottom contains a mixture of upland and wetland species, dominated by bulbous bluegrass (*Poa bulbosa*), filaree (*Erodium botrys*), soft chess (*Bromus mollis*), and Mediterranean barley (*Hordeum hystrix*). There is no riparian vegetation associated with this ditch. The few trees that are adjacent to the ditch are blue oaks (*Quercus douglasii*).

Photographs: Photos 1 – 3

DRAINAGE AREA 2

Drainage Area 2 is a drainage containing a seasonal channel/swale complex. It is located in the southwest corner of the project area, and to the east of Drainage Area 1. The channel sections possess defined beds and banks with sparse vegetation. The swale sections lack beds and banks and are fully vegetated. The watershed for this drainage is located near the southern boundary of the project area.

Flow Characteristics: Seasonal, December to March

Width: Three feet wide

Associated Vegetation: The channel bottoms contain a sparse cover wetland species, including soft chess (*Bromus mollis*), hairy hawkbit (*Leontodon leysseri*), white-tip clover (*Trifolium variegatum*), slender popcorn flower (*Plagiobothrys stipitatus*), coyote thistle (*Eryngium vayseyi*), creeping spikerush (*Eleocharis macrostachya*), and Mediterranean barley (*Hordeum hystrix*). There is no riparian vegetation associated with this drainage. The few trees that are adjacent to the ditch are blue oaks (*Quercus douglasii*).

Photographs: Photos 3 – 6

DRAINAGE AREA 3

Drainage Area 3 is a drainage containing a seasonal channel/swale complex. It is located in the eastern portion of the project area. The channel sections possess defined beds and banks with sparse vegetation. The swale sections lack beds and banks and are fully vegetated. The upstream reach of this drainage is near the top of the watershed.

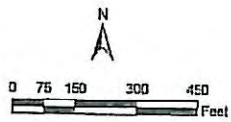
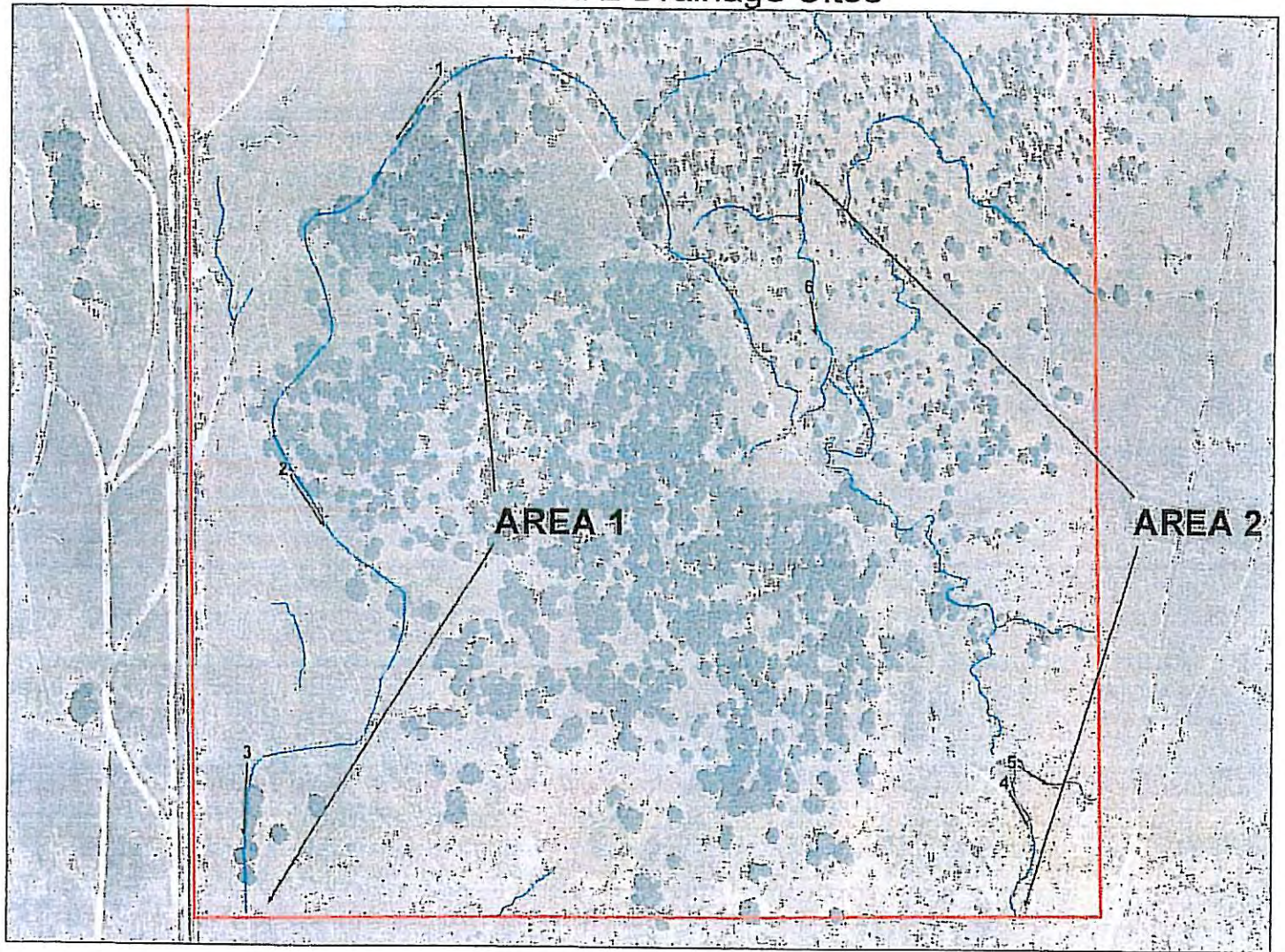
Flow Characteristics: Seasonal, December to April

Width: Channel varies from three to eight feet wide; swale varies from five to eight feet wide.

Associated Vegetation: The channel bottoms contain a sparse cover wetland species, including white-tip clover (*Trifolium variegatum*), slender popcorn flower (*Plagiobothrys stipitatus*), coyote thistle (*Eryngium vayseyi*), creeping spikerush (*Eleocharis macrostachya*), and Mediterranean barley (*Hordeum hystrix*). The only riparian vegetation associated with this drainage is located immediately east of Scott Road. This area contains Fremont cottonwoods (*Populus fremontii*) and willows (*Salix* spp.)

Photographs: Photos 7 - 12

Carpenter Ranch Area 1 and 2 Drainage Sites



Legend

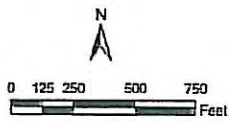
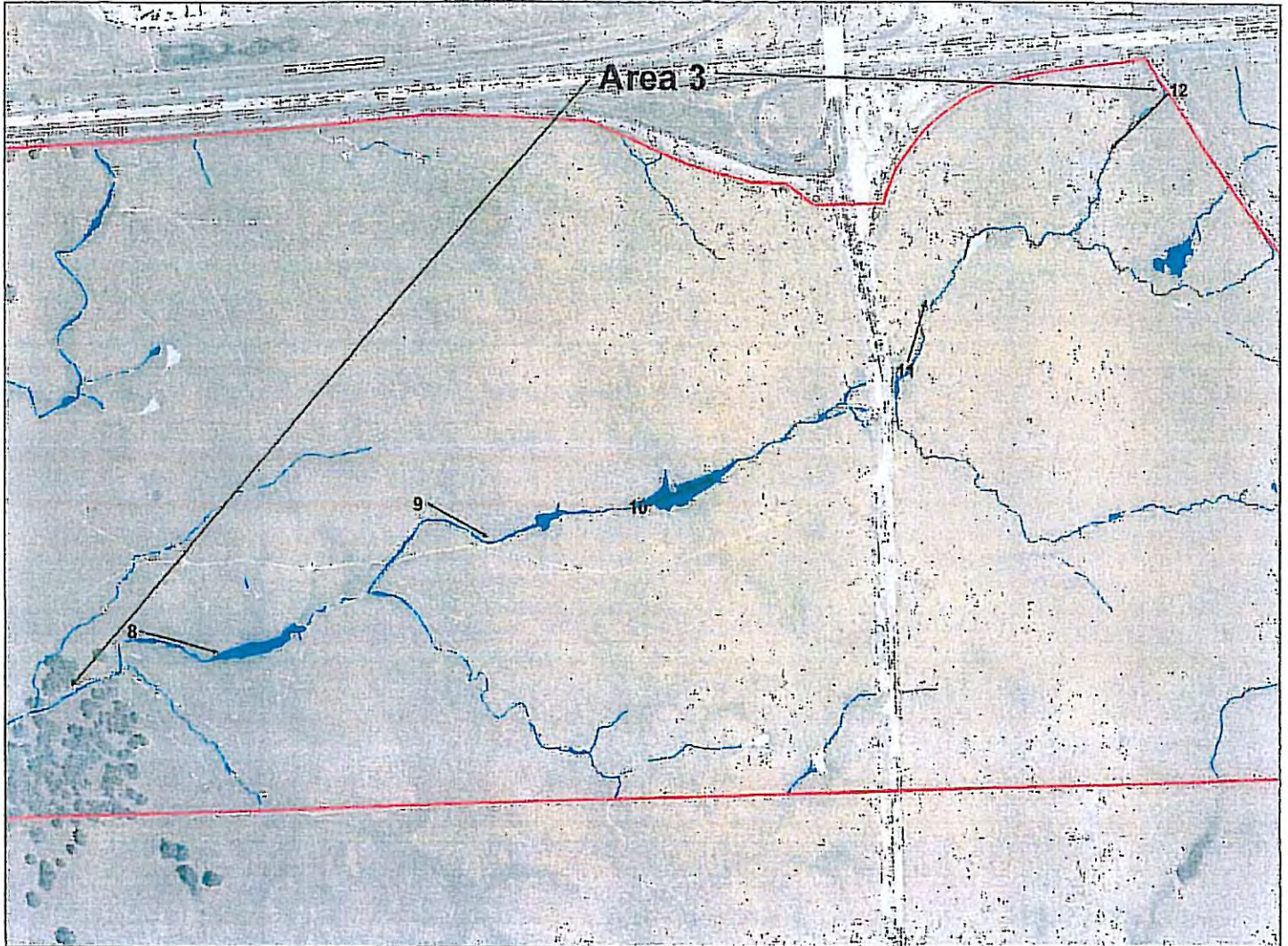
- ▶ Photo Points



GIBSON AND SKORDAL, LLC
WETLANDS CONSULTANTS
2277 Fair Oaks Blvd, Suite 105
Sacramento, CA 95825
(916) 569-1830

Prepared: May 2009

Carpenter Ranch Area 3 Drainage Site



Legend
▶ Photo Points

**GIBSON AND SKORDAL, LLC**
WETLANDS CONSULTANTS
2277 Fair Oaks Blvd, Suite 105
Sacramento, CA 95825
(916) 369-1830

Prepared: May 2009

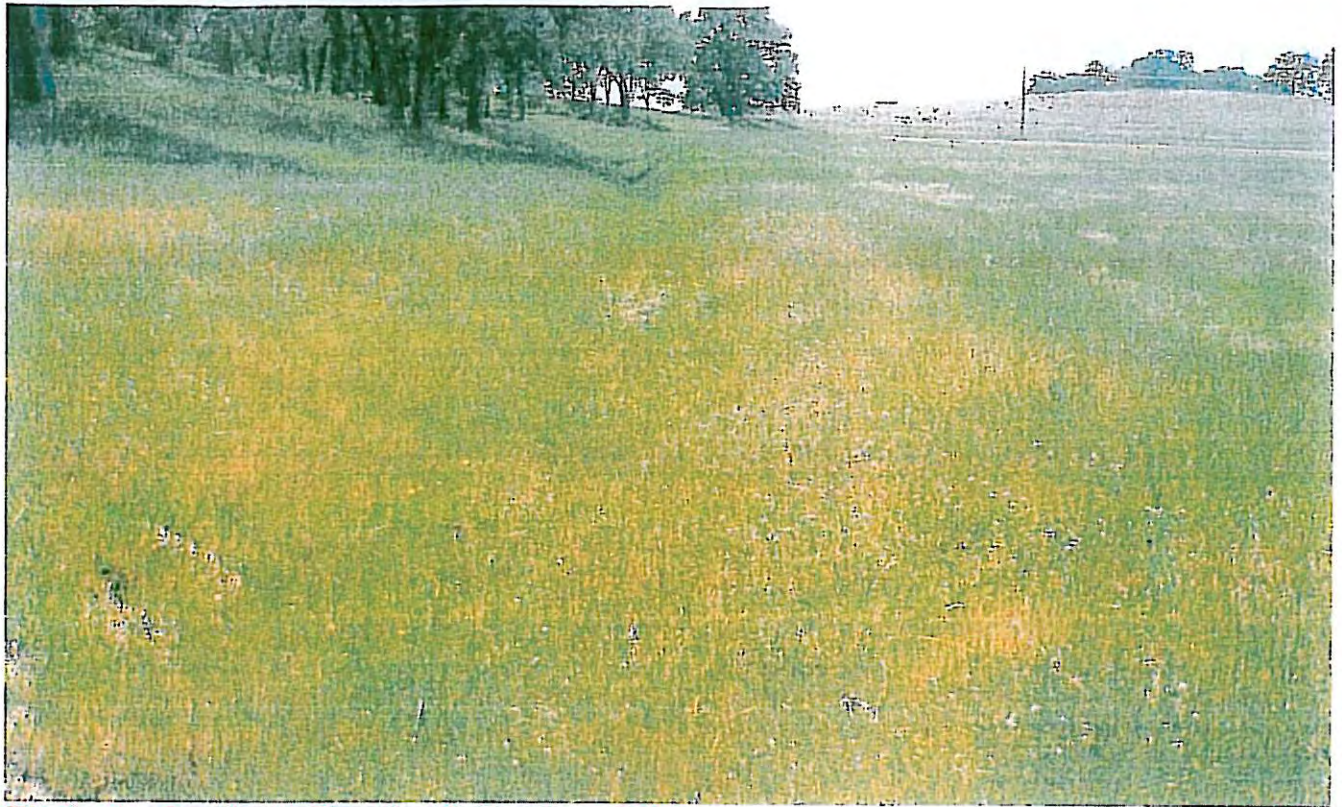


Photo 1 - Southern Reach of Contour Ditch

4/25/2009



Photo 2 - Central Reach of Contour Ditch

4/25/2009



Photo 3 - Northern Reach of Contour Ditch

4/25/2009



Photo 4 - Swale Looking North Near Headwaters

4/25/2009

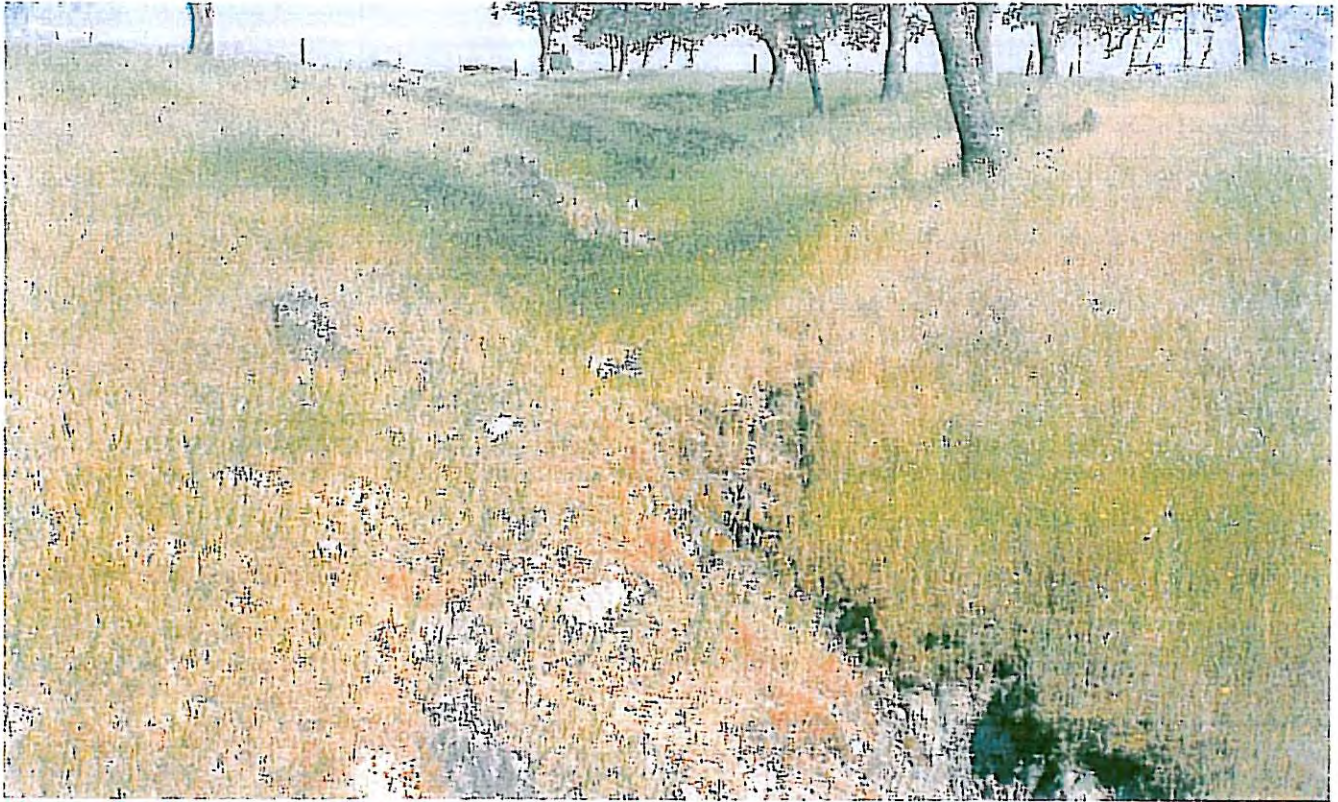


Photo 5 - Ephemeral Channel Looking East Near Headwaters

4/25/2009

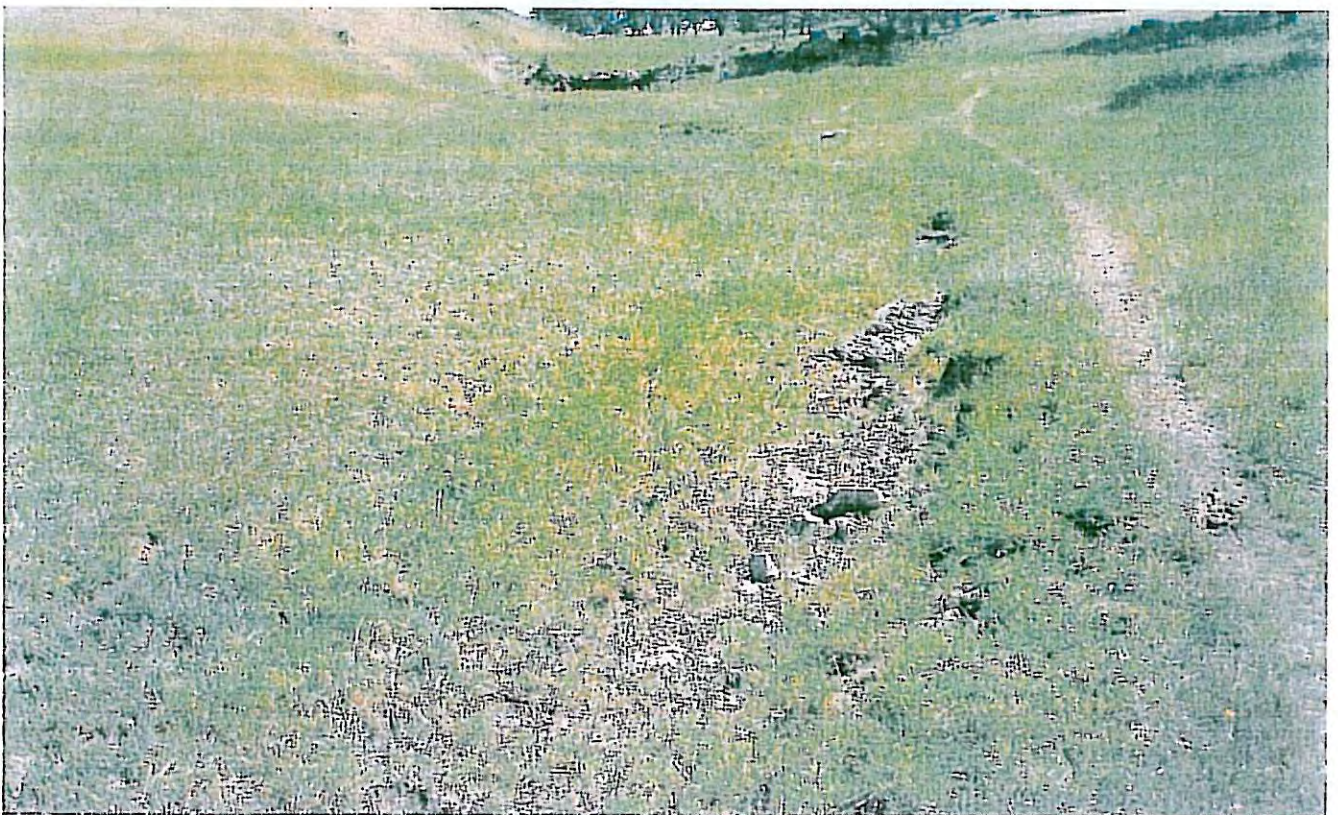


Photo 6 - Central Reach of Channel Looking North

4/25/2009

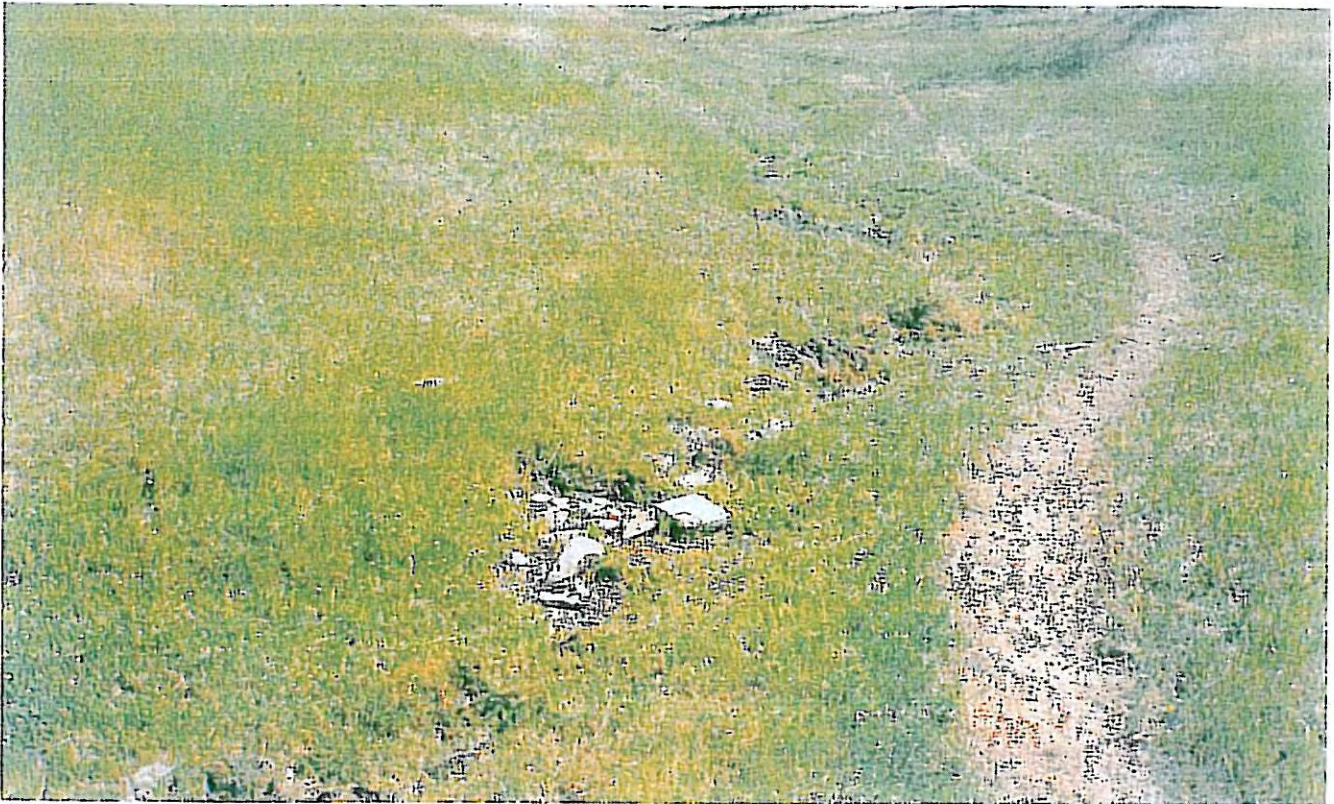


Photo 7 - Southern Reach of Channel Looking North

4/25/2009

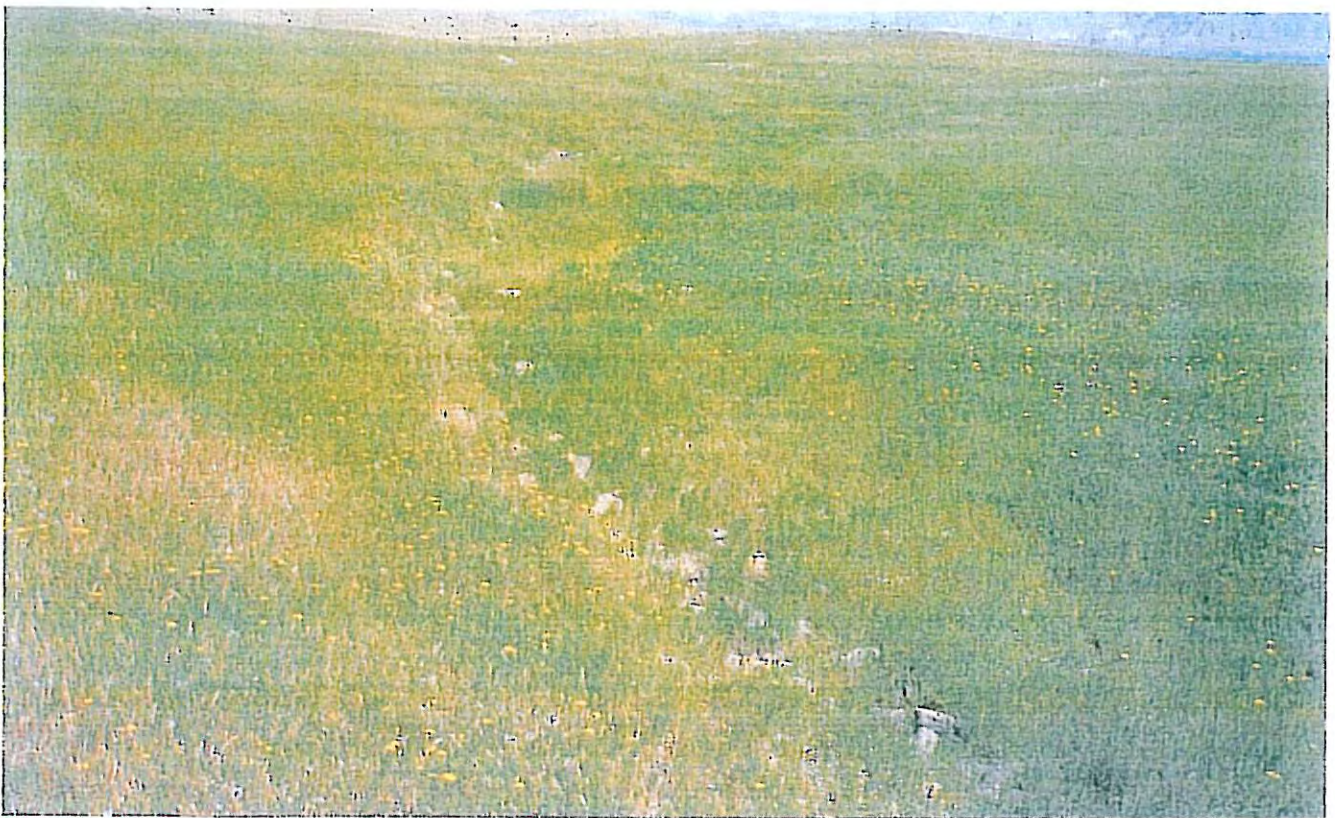


Photo 8 - Downstream Reach of Channel Looking Upstream

4/25/2009

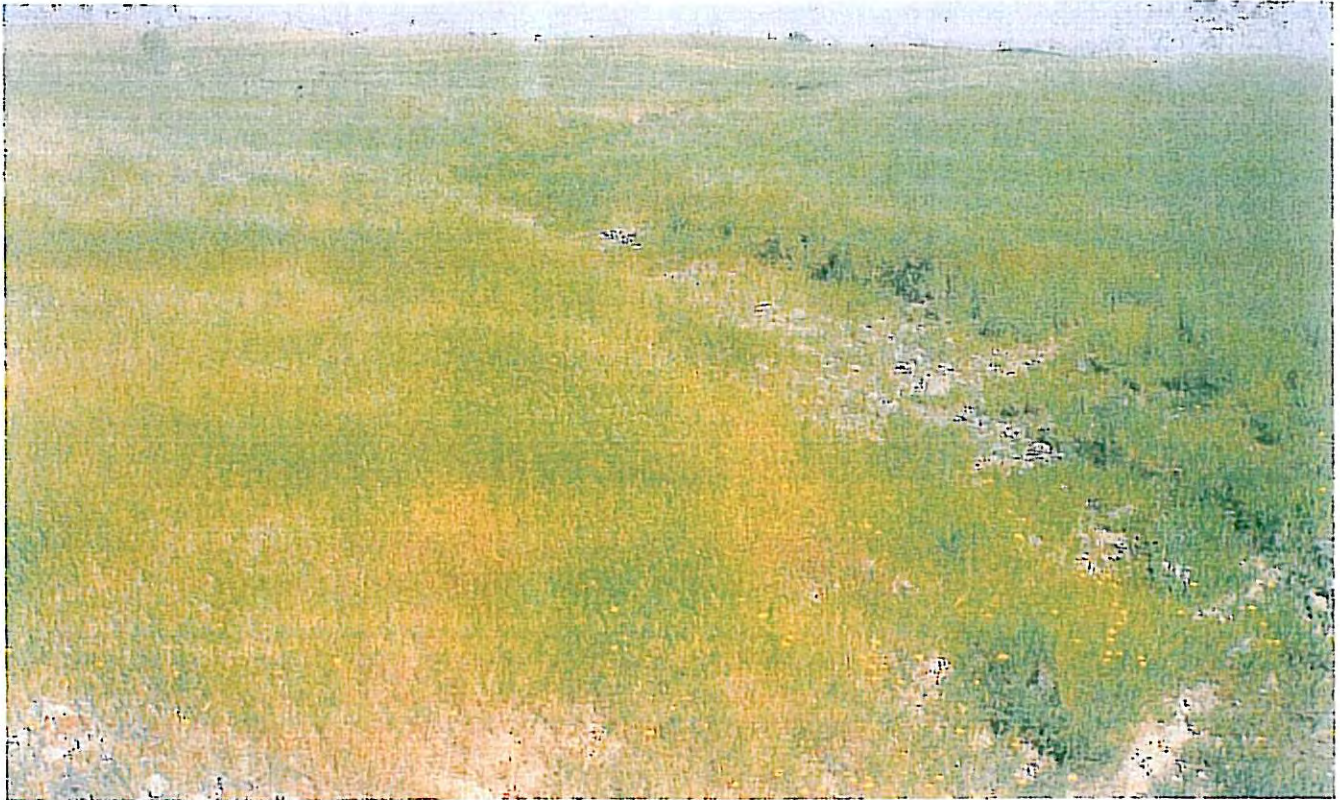


Photo 9 - Typical View of Channel Looking Upstream

4/25/2009

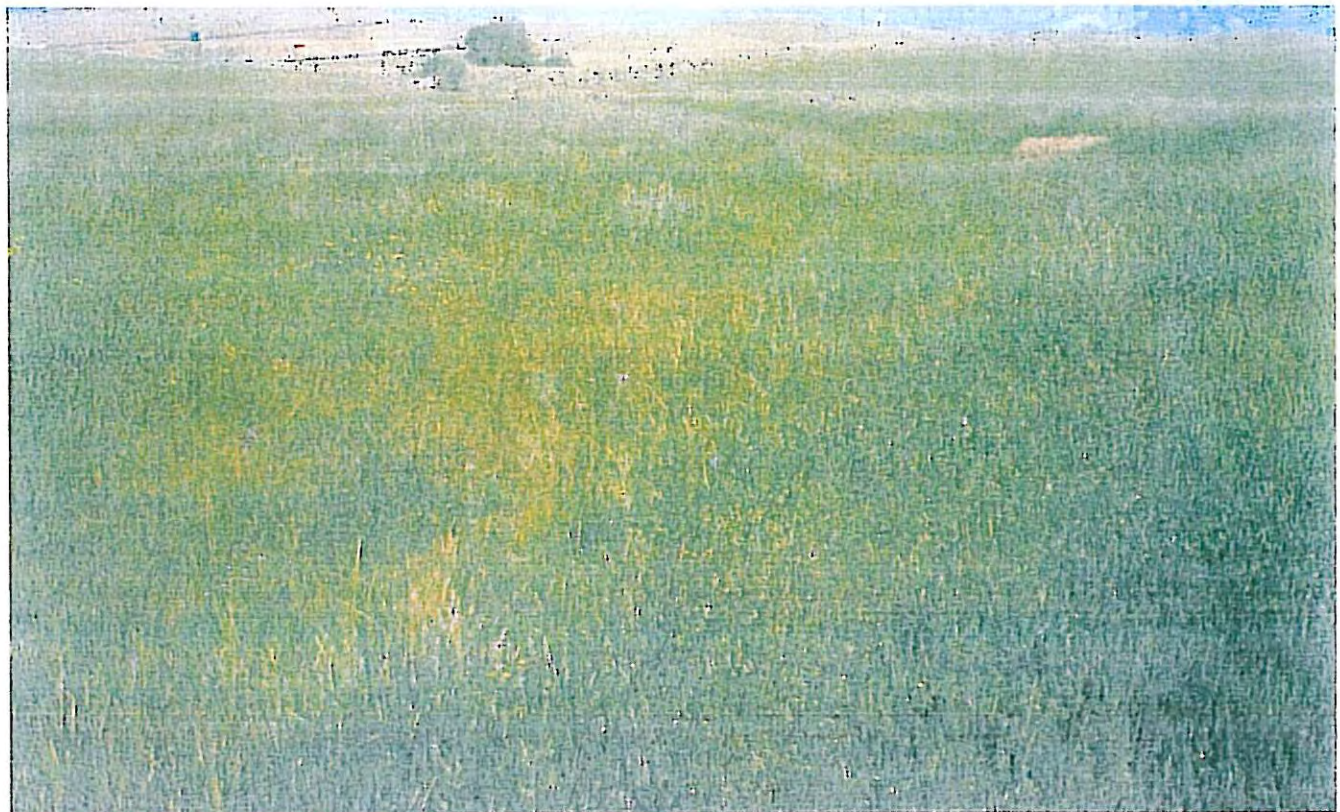


Photo 10 - Typical View of Swale Portion of Drainage

4/25/2009



Photo 11 - Reach of Channel Upstream of Scott Road

4/25/2009

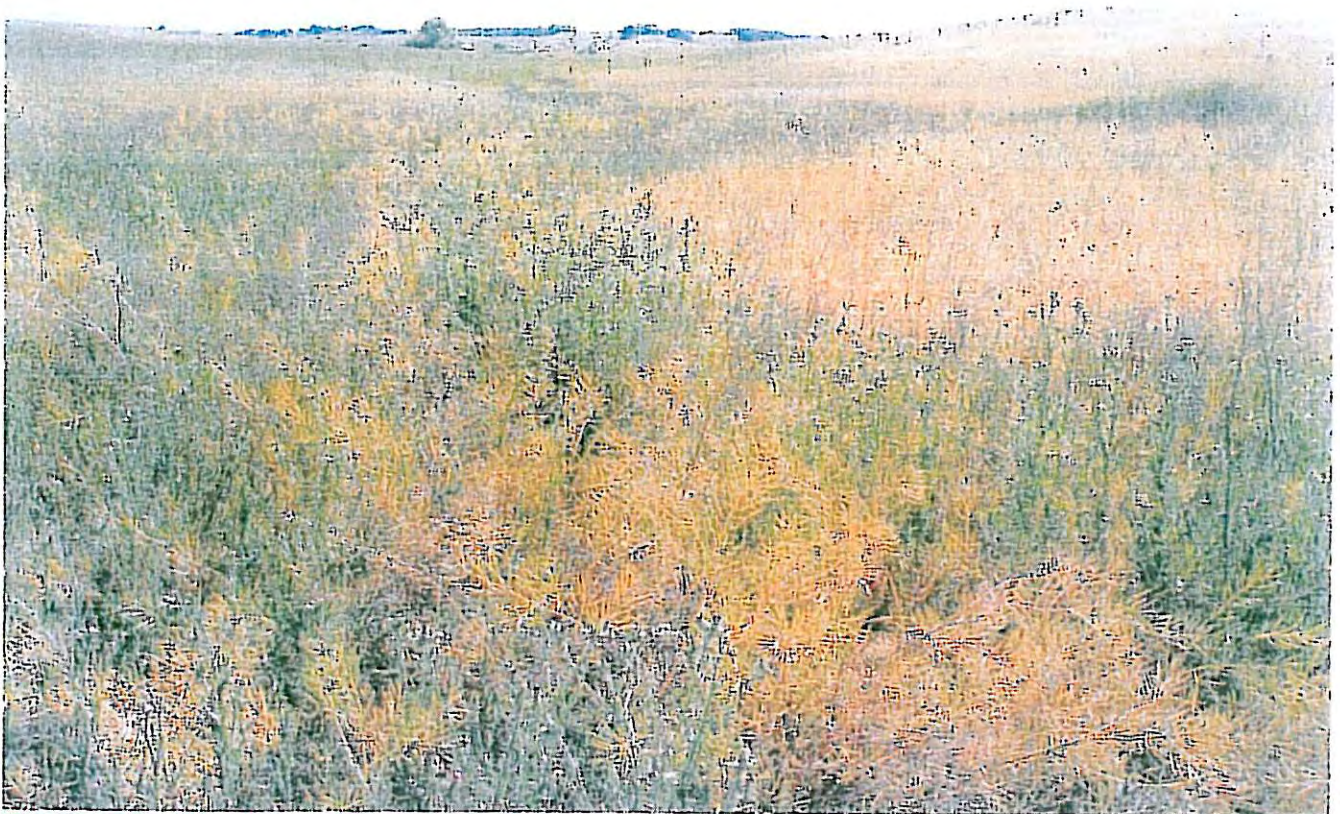


Photo 12 - Upstream Reach of Channel at Old Placerville Road

4/25/2009

Section 404(b)(1) On-Site Alternatives Information

For

Folsom Plan Area Specific Plan Project

City of Folsom, California

Superseded Date:
3 May 2010

Original Date:
July 1, 2009

Prepared For:
City of Folsom
Folsom Area South Group

LIST OF FIGURES

- Figure 1. Project Site and Vicinity
- Figure 2. Folsom Plan Area Components
- Figure 3. Folsom Plan Area Specific Plan Location and the Folsom General Plan
- Figure 4. Proposed Project Land Use Plan
- Figure 5. Natural Resources Conservation Service Soils Types
- Figure 6. USGS Watersheds
- Figure 7. Wetland Delineation
- Figure 8. Proposed Project - Avoidance/Impact
- Figure 9. Alternative 1: No Federal Action
- Figure 10. Alternative 2: Centralized Development
- Figure 11. Alternative 3: Resource Impact Minimization
- Figure 12. Alternative 4: Reduced Hillside Development
- Figure 13. Alternative 5: Proposed Project
- Figure 14. Alternative 5a: Proposed Project with Additional Avoidance Areas
- Figure 15. Alternative 5a: Proposed Project Land Use Plan with Additional Avoidance Areas
- Figure 16. Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50
- Figure 17. Alternative 5b: Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50
- Figure 18. Alternative 5b: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Highway 50 - Detail
- Figure 19. Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
- Figure 20. Alternative 5c: Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road
- Figure 21. Alternative 5c: Proposed Project with Additional Avoidance of Drainage Through Mall Site to Scott Road - Detail
- Figure 22. Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch
- Figure 23. Alternative 5d: Conceptual Land Use Plan Detail - Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch
- Figure 24. Alternative 5d: Proposed Project with Additional Avoidance of Intermittent Drainage and Manmade Ditch on Carpenter Ranch - Detail

LIST OF ATTACHMENTS

Attachment A – Wetland Delineation Verification Letter

Attachment B – Land Use and Cost Tables

Attachment C – Letters Regarding Mall Design Requirements

Attachment D – Drainage Characterization – Carpenter Ranch

ATTACHMENT A

Wetland Delineation Verification Letter

ATTACHMENT B

Land Use and Cost Tables

ATTACHMENT C

Letters Regarding Mall Design Requirements

ATTACHMENT D

Drainage Characterization – Carpenter Ranch