

**Education Services Center
California Environmental Quality Act
Mitigated Negative Declaration**

WRITTEN COMMENTS AND RESPONSES

**ITEM 0910-006
July 2, 2009**



California Regional Water Quality Control Board

Central Valley Region

Karl Longley, ScD, P.E., Chair



Linda Adams
Secretary for
Environmental
Protection

11020 Sun Center Drive, Suite 200, Rancho Cordova 95670-6114
Phone (916) 464-3291 • FAX (916) 464-4797
<http://www.waterboards.ca.gov/centralvalley>

Arnold Schwarzenegger
Governor

16 June 2009

RECEIVED
JUN 17 2009
F.C.U.S.D. Facilities

Geri Wickham
Folsom-Cordova Unified School District
945 Riley Street
Folsom, CA 95630

DRAFT MITIGATED NEGATIVE DECLARATION, FOLSOM CORDOVA UNIFIED SCHOOL DISTRICT EDUCATION SERVICES CENTER (SCH#2009062009)

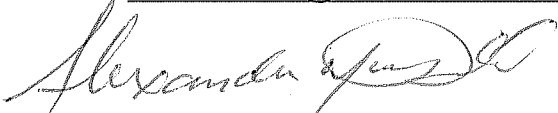
Thank you for the opportunity to review the subject draft mitigated negative declaration. Regional Board staff reviewed the document and we have the following comments:

1. The description of the project includes the construction of a office building and associated parking facilities, along with a drainage swale and stormwater detention basin, with the stockpiling of soil from the construction of the drainage basin on the site. There are several aspects of the project that need to be discussed, but are not found in the document. These include the following:
 - a) There is no discussion on the design and operation of the stormwater retention basin, nor is there a discussion of the construction of an outfall from the detention basin to Alder Creek. This information will need to be supplied as supplement of your application for a 404 Permit/401 Water Quality Certification. Without that information, the application cannot be deemed to be complete. A brief discussion of the design and operation of the basin should be provided in the Mitigated Negative Declaration. The need for a 404 Permit and associated 401 Water Quality Certification is also not discussed in the document.
 - b) There is a lack of discussion on how erosion will be controlled for the large amounts of stockpiled soils at the site. A brief discussion in the document should be provided. This information is also necessary to complete your application for Water Quality Certification.
 - c) The project includes a stormwater swale and stormwater quality retention basin to help treat stormwater pollutants that are picked up by rainwater flowing from the office complex site. Eventually the stormwater swale will be replaced by an underground pipe negating the positive aspects for water improving water quality runoff provided by the vegetated swale. Is the retention basin itself sufficient to provide the water quality aspects needed to reduce the flow of pollutants in stormwater runoff from the project?

Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

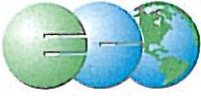
- d) During the post-construction phase, the project proponent must minimize the short and long-term impacts on receiving water quality from the project by considering the following (we understand that the some of these conditions are addressed in the document but are provided all of the conditions so that project proponent may review all of the conditions in their entirety and obtain a better understanding of the requirements):
- (1) minimize the amount of impervious surfaces and directly connected impervious surfaces in areas of new development and use on-site infiltration of runoff in areas with appropriate soils where the infiltration of storm water would not pose a threat to groundwater quality.
 - (2) implement pollution prevention methods supplemented by pollutant source controls and/or treatment controls.
 - (3) ensure existing water of the State (i.e., wetlands, vernal pools, ephemeral drainages, creeks) are not used as pollutant source controls and/or treatment controls. Any discharges from the development must be treated to being discharged to surrounding wetlands and waters of the State.
 - (4) preserve and, where possible, create or restore areas that provide important water quality benefits, such as riparian corridors, wetlands and buffer zones.
 - (5) limit disturbances of natural water bodies and natural drainage systems caused by development (including development of roads).
 - (6) use existing drainage masters plans or studies to estimate increases in pollutant loads and flows resulting from projected future development and require incorporation of structural and non-structural Best Management Practices (BMPs) to mitigate the projected increases in pollutant loads in runoff.
 - (7) identify and avoid development in areas that are particularly susceptible to erosion and sediment loss, ore establish development guidance that protects areas from erosion and sediment loss.
 - (8) control post-development peak storm water run-off discharge rates and velocities to prevent or reduce downstream erosion, and to protect stream habitat.
- e) The project proponent must ensure that all development provides verification of maintenance provisions for post-construction structural and treatment control BMPs. A legally enforceable agreement that assigns responsibility for maintenance of structural or control BMPs would provide that verification.

If you have any questions regarding this matter please contact me at (916) 464-4625 or by e-mail at amacdonald@waterboards.ca.gov.



ALEXANDER MACDONALD
Senior Engineer

cc: State Clearinghouse, Sacramento California
Cindy Caulk, Aerojet-General Corporation, Sacramento



26 June 2009

Mr. Alexander MacDonald
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Re: Folsom Cordova Unified School District (SCH#2009062009)

Dear Mr. MacDonald:

On behalf of the Folsom Cordova Unified School District (FCUSD), ECORP Consulting, Inc. (ECORP) would like to respond to the project-related comments listed on your letter dated 16 June 2009. The Applicant appreciates your thorough review of the DRAFT Mitigated Negative Declaration (MND) for the project. While the MND was not intended to provide a thorough description of each system associated with the project, we trust that the following responses will answer any questions you may have regarding the project.

Comment Responses:

1. a) The storm water quality detention basin was designed for the proposed FCUSD Administration Services Center project in accordance with Sacramento County requirements for such facilities. The basic components of it are an inlet, the basin itself, an access road for maintenance vehicles, and an outlet structure.

The inlet is a 24" reinforced concrete pipe (RCP), which provides a connection between a temporary swale and the basin (Detail 1, attached). The swale collects runoff from the school site, and drains water to the 24" RCP. The 24" RCP in turn drains the runoff into the basin. The invert of the 24" inlet pipe is set approximately 2.3 feet above the bottom of the basin to allow for sediment storage. A trash rack is to be installed on the end of the 24" RCP at the swale so as to insure that trash does not find its way into the pipe and clog it.

The basin is designed as a dry basin, and is sized in accordance with Sacramento County Design Standards to meet the storm water quality needs of the school site project. The side slopes are at 4:1. The bottom is designed with a swale that connects the inlet to the outlet, and has a slope of 0.5%.

The access road is 10 feet wide, and allows vehicles access to the bottom of the basin for maintenance of the inlet, outlet and bottom of the basin.

The outlet structure consists of three main components, a drop inlet located within the basin, an outfall structure, and a 30" diameter RCP extending through the sidewall of the basin connecting the inlet to the outfall. A detail of the outlet structure is attached for reference. The inlet serves as a metering device for the discharge of the water stored within the basin. County design standards require that 75% of the stored volume drains from the basin within a minimum of 24 hours and that the entire volume drains from the basin within a maximum of 48 hours. The inlet has a small diameter hole in its wall at its base with an orifice plate over a portion of the hole. A small diameter hole in the plate allows water to flow into the inlet, which then drains into the 30" RCP, and then eventually out of the basin through the outfall structure. The water drains onto natural ground, and the existing topography directs the flow to Alder Creek.

Based on the current project design, Section 401 Certification and Section 404 permitting are not required as no Waters of the U.S. or State of California will be impacted as a result of project implementation. This was confirmed by Robert Solecki (RWQCB) and Marc Fugler (USACOE).

1. b) The following text is taken from the stockpile note on the SWPPP map (the same note is indicated twice on the SWPPP map near the stockpile areas):
Install/maintain straw wattles at perimeter of stockpiles. Cover stockpiles with plastic prior to rain events. Maintain BMPs until stockpiles are stabilized (Typ.). As noted above, Section 401 Water Quality Certification will not be required for the project as currently designed.

1. c) The primary purpose of the temporary swale is to collect runoff from the project site, and transport it to the storm water quality detention basin (Curve for maximized Detention Volume P_0 , attached). The positive aspect of the runoff flowing through the swale is only a secondary benefit, and is not necessary to meet the storm water quality requirements for the school site project. The storm water quality detention basin is designed in accordance with County standards to meet the storm water quality requirements of the project by itself. More specifically, the basin is sized using the "Sacramento County Volume-Based Design Method". The basic equation used is:

$$WQV(\text{Ac-ft}) = (P_0)A/12$$

'A' is the drainage shed area in acres. ' P_0 ' is the "Maximized Detention Volume" in inches for the drainage shed, and is determined from the attached Figure E-3. For the project, ' P_0 ' is 0.55" for a % impervious of 71%. 'A' is 6 acres. Using these values, the required volume calculates out to 0.28 Ac-ft, which the basin is designed to store.

- 1 d.)

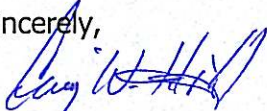
- (1) The project, as currently designed, avoids all waters of the U.S. and State of California.

- (2) All storm drains will be conveyed via a temporary swale which will provide storm water quality treatment prior to the water reaching the basin, which will also provide storm water quality treatment.
- (3) All storm water runoff will be treated prior to entering Alder Creek.
- (4) The project avoids all impacts to Waters of the U.S. and State of California.
- (5) See response 1, above.
- (6) There are no existing drainage master plans or studies for the project area. The site specific needs of the project were analyzed and an appropriate drainage plan was developed.
- (7) As with avoidance of wetland areas, areas susceptible to erosion or mass wasting have been avoided. These areas include the transition zone between the project area and the banks of Alder Creek, as well as the steep hillsides on the eastern portion of the project site.
- (8) The project has been designed to reduce storm water volumes and velocities through the use of the drainage swale and basin.

1 e.) The following text is taken from Section 3.10 - Post construction Storm Water Management (on page 18 of the SWPPP document):
Post construction BMPs planned for the project includes a storm water quality basin, grassy swales and landscaping. Operation and maintenance of post-construction BMPs will be the responsibility of the maintenance personnel. Long term funding for operations and maintenance will also be the responsibility of FCUSD.

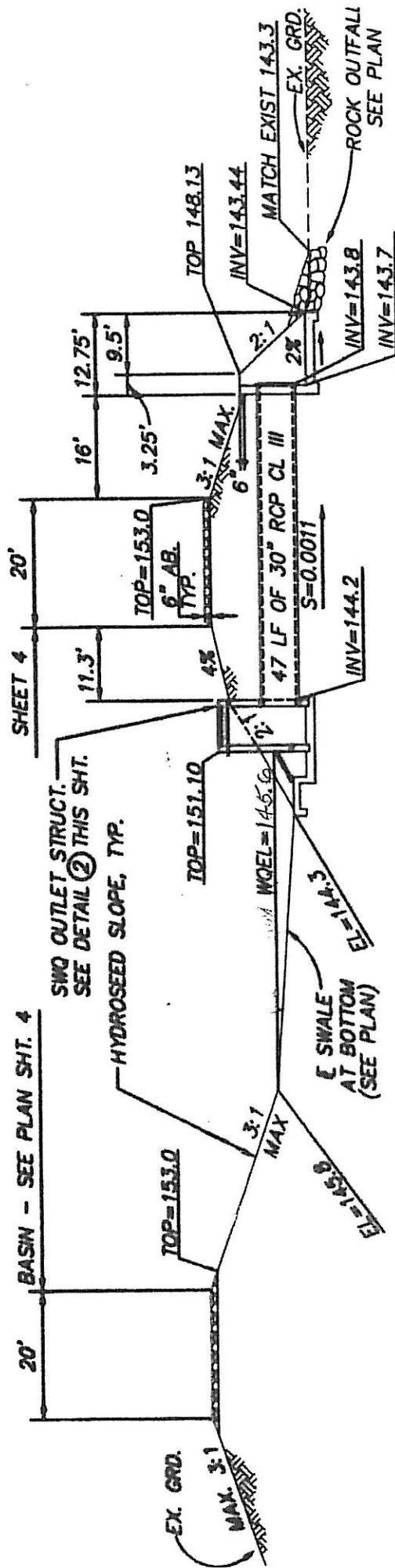
We trust that the above comments adequately address your comments to the MND and the proposed project. Should you have further questions, please feel free to contact me directly at (916) 390-4970 or chiatt@ecorpconsulting.com.

Sincerely,

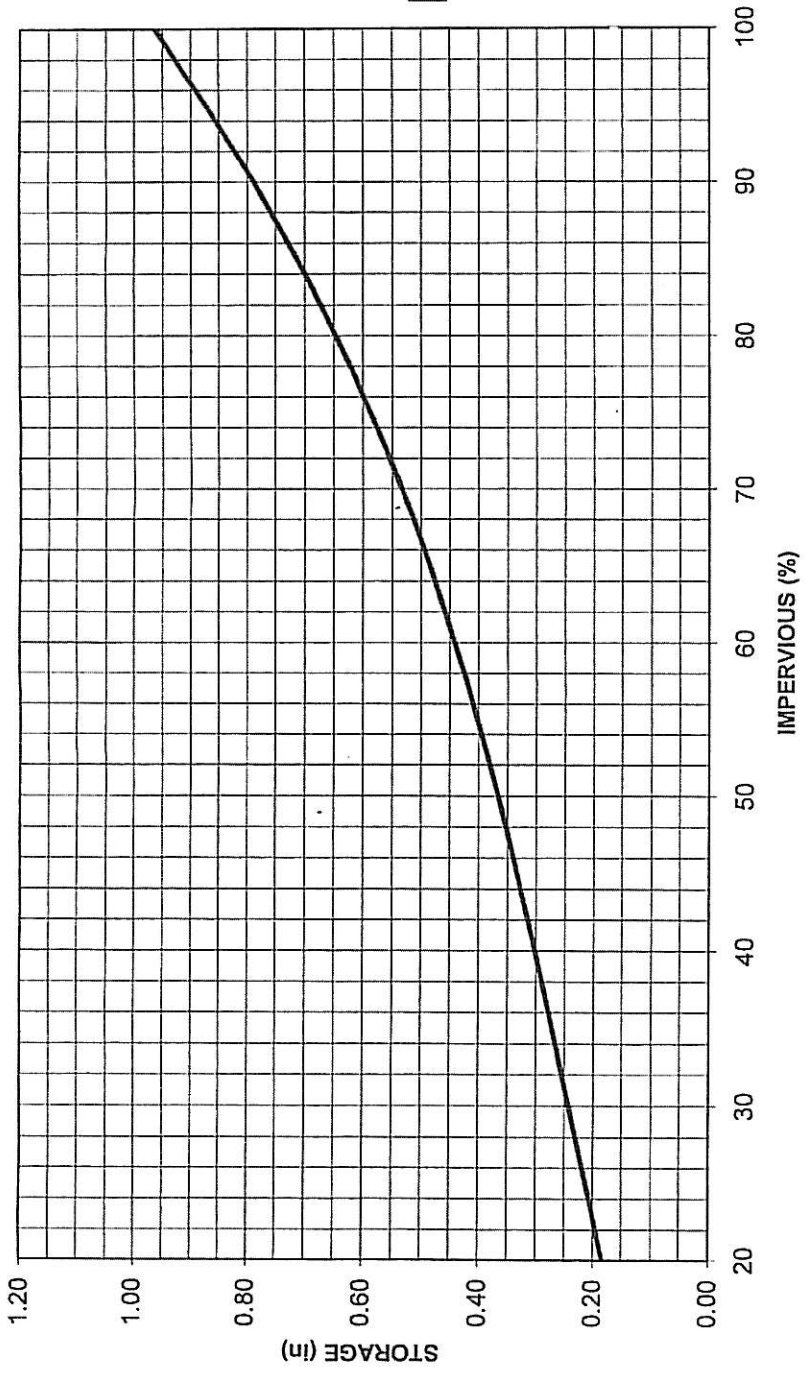


Craig W. Hiatt
Senior Project Manager
ECORP Consulting, Inc.

Cc: Ms. Geri Wickham / FCUSD
Mr. Michael LaFortune / GenCorp Realty Investments
Mr. Bjorn Gregersen / ECORP



BASIN OUTFALL
 (SEE SHEET 4)
DETAIL 1
 N.T.S.



— 48-hr drawdown time

Source: URBAN RUNOFF QUALITY MANAGEMENT: WEF Manual of Practice No. 23 and Report on Engineering Practice No. 87.

Curve for Maximized Detention Volume P₀	Date: August 2006
	Figure: E-3



California Regional Water Quality Control Board

Central Valley Region



Karl Longley, ScD, P.E., Chair

Linda Adams
Secretary for
Environmental
Protection

11020 Sun Center Drive, Suite 200, Rancho Cordova 95670-6114
Phone (916) 464-3291 • FAX (916) 464-4797
<http://www.waterboards.ca.gov/centralvalley>

Arnold Schwarzenegger
Governor

1 July 2009

Geri Wickham
Folsom-Cordova Unified School District
945 Riley Street
Folsom, CA 95630

**RESPONSE TO COMMENTS ON THE DRAFT MITIGATED NEGATIVE DECLARATION,
FOLSOM CORDOVA UNIFIED SCHOOL DISTRICT EDUCATION SERVICES CENTER
(SCH#2009062009)**

Thank you for quick response to our comments on the subject draft mitigated negative declaration. Central Valley Regional Board staff reviewed the responses contained in your 26 June 2009 letter and determined that they adequately address our comments.

If you have any questions regarding this matter please contact me at (916) 464-4625 or by e-mail at amacdonald@waterboards.ca.gov.

ALEXANDER MACDONALD
Senior Engineer

cc: Cindy Caulk, Aerojet-General Corporation, Sacramento

RECEIVED
JUL 02 2009

F.C.U.S.D. Facilities

Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.