

Central Valley Regional Water Quality Control Board

18 July 2012

David Hatch
Gencorp Realty Investments, LLC
620 Coolidge Dr., Suite 100
Folsom, CA 95630

CERTIFIED MAIL
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**CLEAN WATER ACT §401 TECHNICALLY CONDITIONED WATER QUALITY CERTIFICATION;
GENCORP REALTY INVESTMENTS, LLC, EASTON PROJECT (WDID#5A34CR00475),
SACRAMENTO COUNTY**

This Order responds to your 7 December 2009 application submittal for the Water Quality Certification of a commercial and residential development project impacting 5.37 acres of waters of the United States and 4.70 acres of waters of the State.

This Order serves as certification of the United States Army Corps of Engineers' Individual Permit (SPK-2004-00515) under § 401 of the Clean Water Act, and a Waste Discharge Requirement under the Porter-Cologne Water Quality Control Act.

WATER QUALITY CERTIFICATION STANDARD CONDITIONS:

1. This Order serves as a Water Quality Certification (Certification) action that is subject to modification or revocation upon administrative or judicial review, including review and amendment pursuant to § 13330 of the California Water Code and § 3867 of the California Code of Regulations (23 CCR).
2. This Certification action is not intended and shall not be construed to apply to any discharge from any activity involving a hydroelectric facility requiring a Federal Energy Regulatory Commission (FERC) license or an amendment to a FERC license unless the pertinent Certification application was filed pursuant to § 3855(b) of the California Code of Regulations and the application specifically identified that a FERC license or amendment to a FERC license for a hydroelectric facility was being sought.
3. The validity of any non-denial Certification action shall be conditioned upon total payment of the full fee required under § 3833 of the California Code of Regulations, unless otherwise stated in writing by the certifying agency.
4. This Certification is valid for the duration of the described project. This Certification is no longer valid if the project (as currently described) is modified, or coverage under § 404 of the Clean Water Act has expired.

5. All reports, notices, or other documents required by this Certification or requested by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) shall be signed by a person described below or by a duly authorized representative of that person.
 - (a) For a corporation: by a responsible corporate officer such as (1) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function; (2) any other person who performs similar policy or decision-making functions for the corporation; or (3) the manager of one or more manufacturing, production, or operating facilities if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - (b) For a partnership or sole proprietorship: by a general partner or the proprietor.
 - (c) For a municipality, state, federal, or other public agency: by either a principal executive officer or ranking elected official.
6. Any person signing a document under Standard Condition number 5 shall make the following certification, whether written or implied:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

TECHNICAL CERTIFICATION CONDITIONS:

In addition to the above standard conditions, Gencorp Realty Investments, LLC shall satisfy the following:

1. Gencorp Realty Investments, LLC shall apply for an administrative name change or an amendment to this Certification if any of the following occur: (a) change in Applicant of any portion of the Easton Project property; (b) change in the project description, including, but not limited to, project phasing; or (c) change in discharge amounts, or temporary and/or permanent impacts.
2. Gencorp Realty Investments, LLC shall notify the Central Valley Water Board in writing 7 days in advance of the start of any work within waters of the United States or State. The notification shall include the name of the project and the WDID number, and shall be sent to the Central Valley Water Board Contact indicated in this Certification.
3. Except for activities permitted by the United States Army Corps of Engineers under § 404 of the Clean Water Act, soil, silt, or other organic materials shall not be placed where such materials could pass into surface water or surface water drainage courses.
4. All areas disturbed by project activities shall be protected from washout or erosion.
5. Gencorp Realty Investments, LLC shall maintain a copy of this Certification and supporting documentation (Project Information Sheet) at the Project site during construction for review by site personnel and agencies. All personnel (employees, contractors, and subcontractors) performing work on the proposed project shall be adequately informed and trained regarding the conditions of this Certification.

6. All temporarily affected areas will be restored to pre-construction contours and conditions upon completion of construction activities.
7. Gencorp Realty Investments, LLC shall perform surface water sampling: 1) when performing any in-water work; 2) in the event that project activities result in any materials reaching surface waters; or 3) when any activities result in the creation of a visible plume in surface waters. The monitoring requirements in Table 1 shall be conducted upstream out of the influence of the project, and 300 feet downstream of the work area. The sampling frequency may be modified for certain projects with written approval from Central Valley Water Board staff.

Table 1:

Parameter	Unit	Type of Sample	Minimum Sampling Frequency	Required Analytical Test Method
Turbidity	NTU	Grab ⁽¹⁾	Every 4 hours during in-water work	(2)
Settleable Material	mL/L	Grab ⁽¹⁾	Every 4 hours during in-water work	(2)
Visible construction related pollutants ⁽³⁾	Observations	Visual Inspections	Continuous throughout the construction period	—
Temperature ⁽⁴⁾	°F (or as °C)	Grab ⁽¹⁾	Every 4 hours during in-water work	(2)
pH ⁽⁴⁾	Standard Units	Grab ⁽¹⁾	Every 4 hours during in-water work	(2)
Dissolved Oxygen ⁽⁴⁾	mg/L & % saturation	Grab ⁽¹⁾	Every 4 hours during in-water work	(2)

⁽¹⁾ Grab sample shall not be collected at the same time each day to get a complete representation of variations in the receiving water.

⁽²⁾ Pollutants shall be analyzed using the analytical methods described in 40 CFR Part 136; where no methods are specified for a given pollutant, method shall be approved by Central Valley Water Board staff.

⁽³⁾ Visible construction-related pollutants include oil, grease, foam, fuel, petroleum products, and construction-related, excavated, organic or earthen materials.

⁽⁴⁾ Temperature, pH, and dissolved oxygen water quality monitoring is required due to the occurrence of state and federally listed species habitat within the project area.

A surface water monitoring report shall be submitted to the Central Valley Water Board Contact indicated in this Certification within two weeks of initiation of sampling and every two weeks thereafter. In reporting the monitoring data, Gencorp Realty Investments, LLC shall arrange the data in tabular form so that the sampling locations, date, constituents, and concentrations are readily discernible. The data shall be summarized in such a manner to illustrate clearly whether the project complies with Certification requirements. The report shall include surface water sampling results and visual observations, and identification of the turbidity increase in the receiving water applicable to the natural turbidity conditions specified in the turbidity criteria below.

8. The Central Valley Water Board adopted a *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins*, Fourth Edition, revised October 2011 (Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and

policies to achieve those objectives for all waters addressed through the plan. Turbidity, settleable matter, temperature, pH, and dissolved oxygen limits are based on water quality objectives contained in the Basin Plan and required as part of this Certification.

9. Activities shall not cause turbidity increases in surface water to exceed:
- (a) where natural turbidity is less than 1 Nephelometric Turbidity Units (NTUs), controllable factors shall not cause downstream turbidity to exceed 2 NTUs;
 - (b) where natural turbidity is between 1 and 5 NTUs, increases shall not exceed 1 NTU;
 - (c) where natural turbidity is between 5 and 50 NTUs, increases shall not exceed 20 percent;
 - (d) where natural turbidity is between 50 and 100 NTUs, increases shall not exceed 10 NTUs; and
 - (e) where natural turbidity is greater than 100 NTUs, increases shall not exceed 10 percent.

Except that these limits will be eased during in-water working periods to allow a turbidity increase of 15 NTUs over background turbidity as measured in surface waters at the downstream sampling location. In determining compliance with the above limits, appropriate averaging periods may be applied provided that beneficial uses will be fully protected. Averaging periods may only be used with prior approval of Central Valley Water Board staff.

10. Activities shall not cause settleable matter to exceed 0.1 mL/L in surface waters as measured in surface waters within 300 feet downstream of the project.
11. Activities shall not cause temperature in surface waters to increase more than 5°F above natural receiving water temperature for waters with designated COLD or WARM beneficial uses.
12. Activities shall not cause pH to be depressed below 6.5 nor raised above 8.5 in surface water.
13. Activities shall not cause dissolved oxygen to be reduced below 5.0 mg/L for waters designated with the WARM beneficial use, and 7.0 mg/L for waters designated with the COLD or SPWN beneficial uses, in surface water.
14. Gencorp Realty Investments, LLC shall notify the Central Valley Water Board immediately if the above criteria for turbidity, settleable matter, pH, temperature and dissolved oxygen are exceeded.
15. The discharge of petroleum products or other excavated materials to surface water is prohibited. Activities shall not cause visible oil, grease, or foam in the work area or 300 feet downstream of the work area. Gencorp Realty Investments, LLC shall notify the Central Valley Water Board immediately of any spill of petroleum products or other organic or earthen materials.
16. Activities shall not cause degradation of waters of the State.
17. The use of netting material (e.g., monofilament-based erosion blankets) that could trap aquatic dependent wildlife is prohibited within the project area.
18. Gencorp Realty Investments, LLC shall comply with all California Department of Fish and Game requirements and recommendations, including, but not limited to, those requirements and recommendations described in Streambed Alteration Agreement No. 1600-2010-0145-R2.
19. Gencorp Realty Investments, LLC shall comply with all United States Fish and Wildlife Service requirements and recommendations, including, but not limited to, those requirements and

recommendations described in Biological Opinion (81420-2010-F0714-1), provided to United States Army Corps of Engineers, 17 February 2011.

20. Gencorp Realty Investments, LLC must obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ for discharges to surface waters comprised of storm water associated with construction activity, including, but not limited to, demolition, clearing, grading, excavation, and other land disturbance activities of one or more acres, or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres.
21. The Conditions in this Certification are based on the information in the attached "Project Information." If the information in the attached Project Information Sheet is modified or the project changes, this Certification is no longer valid until amended by the Central Valley Water Board.
22. Raw cement, concrete (or washing thereof), asphalt, drilling fluids or lubricants, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to fish and wildlife resulting from or disturbed by project-related activities, shall be prevented from contaminating the soil and/or entering waters of the United States or waters of the State.
23. Refueling of equipment within the floodplain or within 300 feet of a waterway is prohibited. If some critical equipment must be refueled within 300 feet of the waterway, strict spill prevention and countermeasures must be implemented to avoid spills. Refueling areas shall be provided with secondary containment including drip pans and/or placement of absorbent material. No hazardous materials, pesticides, fuels, lubricants, oils, hydraulic fluids, or other construction-related potentially hazardous substances should be stored within a floodplain or within 300 feet of a waterbody. Gencorp Realty Investments, LLC must perform frequent inspections of construction equipment prior to utilizing it near surface waters to insure leaks from the equipment are not occurring and are not a threat to water quality.
24. Concrete shall be completely cured before coming into contact with waters of the United States and/or waters of the State. Waters of the United States and/or waters of the State that comes in contact with wet concrete shall be pumped out and disposed of at an appropriate off-site commercial facility which is authorized to accept concrete wastes.
25. Creosote-treated wood products or any other products that are highly flammable and/or toxic to aquatic life shall not be installed in waters of the State and waters of the United States.
26. This Certification does not provide new water rights or modify existing water rights.
27. This Certification does not allow permanent water diversion of flow from the receiving water. This Certification is invalid if any water is permanently diverted as a part of the project.
28. Prior to the commencement of in-water construction, if surface water diversions and/or dewatering are anticipated, Gencorp Realty Investments, LLC shall develop and maintain onsite a Surface Water Diversion and/or Dewatering Plan(s) (Plan). The Plan(s) shall include the proposed method and duration of diversion activities, structure configuration, construction materials, equipment, erosion and sediment controls, and a map or drawing indicating the location(s) of diversion and/or dewatering, and discharge points. The Surface Water Diversion and/or Dewatering Plan(s) must be consistent with this Certification.

29. Any temporary dam or other artificial obstruction constructed shall only be built from clean materials such as sandbags, gravel bags, water dams, or clean/washed gravel which will cause little or no siltation. Stream flow shall be diverted using gravity flow through temporary culverts/pipes or pumped around the work site with the use of hoses.
30. When work in a flowing stream is unavoidable and any dam or other artificial obstruction is being constructed, maintained, or placed in operation, sufficient water shall at all times be allowed to pass downstream, to maintain beneficial uses of waters of the State below the dam. Construction, dewatering, and removal of temporary cofferdams shall not violate Conditions 9 through 13 of this Certification. If water quality criteria are exceeded, Gencorp Realty Investments, LLC shall notify the Central Valley Water Board immediately.
31. Following construction and dewatering activities, Alder Creek and Buffalo Creek shall be returned to preconstruction conditions and contours.
32. All roadside ditches and waterbodies that contain vegetation and have been disturbed by project construction shall be stabilized and re-vegetated with native seed mix.
33. The mitigation measures specified in the approved Environmental Impact Report for the project, as they pertain to biology, hydrology and water quality impacts, are included in this Certification, as required by § 21081.6 of the Public Resource Code and CEQA Guidelines, § 15097 of the California Code of Regulations.
34. In the event of any violation or threatened violation of the conditions of this Certification, the violation or threatened violation shall be subject to any remedies, penalties, process, or sanctions as provided for under state and federal law. The applicability of any state law authorizing remedies, penalties, process, or sanctions for the violation or threatened violation constitutes a limitation necessary to ensure compliance with this Certification.
 - (a) If Gencorp Realty Investments, LLC or a duly authorized representative of the project fails or refuses to furnish technical or monitoring reports, as required under this Certification, or falsifies any information provided in the monitoring reports, the applicant is subject to civil liability, for each day of violation, and/or criminal liability.
 - (b) In response to a suspected violation of any condition of this Certification, the Central Valley Water Board may require Gencorp Realty Investments, LLC to furnish, under penalty of perjury, any technical or monitoring reports the Central Valley Water Board deems appropriate, provided that the burden, including cost of the reports, shall be in reasonable relationship to the need for the reports and the benefits to be obtained from the reports.
 - (c) Gencorp Realty Investments, LLC shall allow the staff(s) of the Central Valley Water Board, or an authorized representative(s), upon the presentation of credentials and other documents, as may be required by law, to enter the project premises for inspection, including taking photographs and securing copies of project-related records, for the purpose of assuring compliance with this Certification and determining the ecological success of the project.
35. Gencorp Realty Investments, LLC must submit final design plans, which are stamped and signed by a Professional Engineer, prior to the construction of any outfalls or crossing structures that directly impact Alder Creek, to the Central Valley Water Board Contact indicated in this Certification, for verification of consistency with the Certification.

36. Construction of outfall structures, bridges and/or crossings within the Alder Creek corridor shall not result in permanent impacts to waters of the United States or waters of the State.
37. A copy of this Certification must be provided to the Preserve Manager and anyone who is making decisions with regards to management activities within the Conservation Easement area.
38. Gencorp Realty Investments, LLC must adhere to all mitigation requirements in the United States Army Corps of Engineers Individual Permit (SPK #-2004-00515).
39. Gencorp Realty Investments, LLC shall provide evidence of all on-site and off-site compensatory mitigation requirements, including, but not limited to, the purchase of mitigation credits and recordation of a perpetual conservation easement grant as required by the United States Army Corps of Engineers prior to commencing construction to the Central Valley Water Board.

Compensatory mitigation must comply with the effective policy at the time of Certification, which ensures no overall net loss of wetlands for impacts to waters of the State.

Evidence of compliance with compensatory mitigation requirements include providing a recorded executed perpetual conservation easement grant with Sacramento County as proposed in the 401 Water Quality Certification application and a letter from the approved (compensatory mitigation bank or in-lieu fee recipient). The letter must: (a) be on the compensatory mitigation bank's or in-lieu fee recipient's letterhead; (b) be signed by an authorized representative of the compensatory mitigation bank or in-lieu fee recipient; (c) indicate the United States Army Corps of Engineers' SPK number; (d) describe the project name and location; and (e) detail the type of compensatory mitigation credits purchased or in-lieu fees paid for the project's impacts.

STORM WATER QUALITY CONDITIONS:

Gencorp Realty Investments, LLC shall also satisfy the following additional storm water quality conditions:

1. During the construction phase, Gencorp Realty Investments, LLC must employ strategies to minimize erosion and the introduction of pollutants into storm water runoff. These strategies must include the following:
 - (a) the Storm Water Pollution Prevention Plan must be prepared during the project planning and design phases and implemented, as appropriate, before construction; and
 - (b) an effective combination of erosion and sediment control Best Management Practices (BMPs) must be implemented and adequately working prior to the rainy season and during all phases of construction.
2. Gencorp Realty Investments, LLC must minimize the short and long-term impacts on receiving water quality from the Easton Project by implementing the following post-construction storm water management practices and as required by the local agency permitting the project, as appropriate:
 - (a) minimize the amount of impervious surface;
 - (b) reduce peak runoff flows;
 - (c) provide treatment BMPs to reduce pollutants in runoff;
 - (d) ensure existing waters of the State (e.g., wetlands, vernal pools, or creeks) are not used as pollutant source controls and/or treatment controls;
 - (e) preserve and where possible, create or restore areas that provide important water quality benefits, such as riparian corridors, wetlands, and buffer zones;

- (f) limit disturbances of natural water bodies and natural drainage systems caused by development (including development of roads, highways, and bridges);
 - (g) use existing drainage master plans or studies to estimate increases in pollutant loads and flows resulting from projected future development and require incorporation of structural and non-structural BMPs to mitigate the projected pollutant load increases in surface water runoff;
 - (h) identify and avoid development in areas that are particularly susceptible to erosion and sediment loss, or establish development guidance that protects areas from erosion/ sediment loss; and
 - (i) control post-development peak storm water run-off discharge rates and velocities to prevent or reduce downstream erosion, and to protect stream habitat.
3. Gencorp Realty Investments, LLC shall ensure that all development within the project provides verification of maintenance provisions for post-construction structural and treatment control BMPs as required by the local agency permitting the project. Verification shall include one or more of the following, as applicable:
- (a) the developer's signed statement accepting responsibility for maintenance until the maintenance responsibility is legally transferred to another party; or
 - (b) written conditions in the sales or lease agreement that require the recipient to assume responsibility for maintenance; or
 - (c) written text in project conditions, covenants and restrictions for residential properties assigning maintenance responsibilities to a home owner's association, or other appropriate group, for maintenance of structural and treatment control BMPs; or
 - (d) any other legally enforceable agreement that assigns responsibility for storm water BMPs maintenance.

CENTRAL VALLEY WATER BOARD CONTACT:

Skyler Anderson, Environmental Scientist
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114
sanderson@waterboards.ca.gov
(916) 464-4849

CALIFORNIA ENVIRONMENTAL QUALITY ACT:

Sacramento County is the Lead Agency responsible for compliance with the California Environmental Quality Act for the Easton Project pursuant to § 21000 et seq. of the Public Resources Code. Sacramento County certified the Environmental Impact Report on 17 December 2008 (State Clearinghouse Number 2005062128).

The Central Valley Water Board is a responsible agency for the project. In making the determinations and findings, the Central Valley Water Board must presume that the Environmental Impact Report comports with the requirements of the California Environmental Quality Act and is valid pursuant § 21167.3(b) of the Public Resources Code. The Central Valley Water Board has reviewed and considered the environmental documents and all proposed mitigation measures.

The Central Valley Water Board has reviewed and evaluated the significant and potentially significant impacts to water quality identified in the Environmental Impact Report. The various mitigation measures discussed in the Environmental Impact Report were adopted to reduce and minimize project impacts. The mitigation measures are required by this Certification. The Central Valley Water Board

finds that these mitigation measures, along with the conditions of this Certification, are adequate to reduce water quality impacts to less than significant levels.

With regard to the remaining significant impacts, identified in the Environmental Impact Report the corresponding mitigation measures proposed are within the responsibility and jurisdiction of other public agencies which can and should implement the proposed mitigation measures.

WATER QUALITY CERTIFICATION:

I hereby issue an Order certifying that any discharge from the Gencorp Realty Investments LLC, Easton Project (WDID#5A34CR00475) will comply with the applicable provisions of § 301 ("Effluent Limitations"), § 302 ("Water Quality Related Effluent Limitations"), § 303 ("Water Quality Standards and Implementation Plans"), § 306 ("National Standards of Performance"), and § 307 ("Toxic and Pretreatment Effluent Standards") of the Clean Water Act. This discharge is also regulated under State Water Resources Control Board Water Quality Order No. 2003-0017 DWQ "Statewide General Waste Discharge Requirements For Dredged Or Fill Discharges That Have Received State Water Quality Certification (General WDRs)".

Except insofar as may be modified by any preceding conditions, all Certification actions are contingent on (a) the discharge being limited and all proposed mitigation being completed in strict compliance with the conditions of this Certification, Gencorp Realty Investments, LLC's project description, and the attached Project Information Sheet, and (b) compliance with all applicable requirements of the *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins*, Fourth Edition, revised October 2011.



for Pamela C. Creedon
Executive Officer

Enclosure: Project Information

Attachments: Figure 1 – Easton Project Area

Figure 2 – Glenborough at Easton Place and Easton Phasing Plan

cc: Distribution List, page 17

PROJECT INFORMATION

Application Date: 7 December 2009

Applicant: David Hatch
Gencorp Realty Investments, LLC
620 Coolidge Dr., Suite 100
Folsom, CA 95630

Applicant Representatives: Bjorn Gregersen
ECORP Consulting, Inc.
2525 Warren Drive
Rocklin, CA 95677

Project Name: Easton Project (Project)

Application Number: WDID# 5A34CR00475

Type of Project: Commercial and Residential Development

Approximate Timeframe of Project Implementation: The project is expected to begin in 2012 and completed in summer of 2021.

Project Location: Township 9 North, Range 8 East, MDB&M.
Latitude: 38°37'45"N and Longitude: 121°10'45"W

County: Sacramento County

Receiving Water(s) (hydrologic unit): Alder Creek and Buffalo Creek, Sacramento Hydrologic Basin, Valley-American Hydrologic Unit #519.21, Lower American HSA

Water Body Type: Wetlands and Streambed

Designated Beneficial Uses: The *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins*, Fourth Edition, revised October 2011 (Basin Plan) has designated beneficial uses for surface and ground waters within the region. Beneficial uses that could be impacted by the project include, but are not limited to: Municipal and Domestic Water Supply (MUN); Agricultural Supply (AGR); Industrial Supply (IND); Hydropower Generation (POW); Groundwater Recharge (GWR); Water Contact Recreation (REC-1); Non-Contact Water Recreation (REC-2); Warm Freshwater Habitat (WARM); Cold Freshwater Habitat (COLD); Preservation of Biological Habitats of Special Significance (BIOL); Rare, Threatened, or Endangered Species (RARE); Migration of Aquatic Organisms (MIGR); Spawning, Reproduction, and/or Early Development (SPWN); and Wildlife Habitat (WILD). A comprehensive and specific list of the Beneficial Uses applicable for the project area can be found at http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/index.shtml

303(d) List of Water Quality Limited Segments: The Project's receiving water is Alder Creek, which is a tributary to Lake Natoma, and Buffalo Creek, which is a tributary to the American River. Lake Natoma and the American River, below Nimbus Dam, are within a water quality limited segment for mercury. The project will not contribute to an already impaired water body. The most recent list of approved water quality limited segments can be found at: http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml

Project Description: The 1,433-acre Project is located south of Highway 50 and west of Prairie City Road in Sacramento County. The Project consists of the development of two multiple-use communities: Glenborough at Easton and Easton Place.

Glenborough at Easton is an approximately 200-acre community with 3,239 dwelling units that includes residential, commercial mixed-use, commercial, office, open space, park, and quasi-public uses.

Easton Place is an approximately 200-acre transit-oriented village with approximately 3.5 million square feet of commercial development space and an additional 1,544 dwelling units.

The Project will be constructed in phases as shown in the Glenborough at Easton Place and Easton Phasing Plan, Figure 2. Together, the Glenborough at Easton and Easton Place communities include 4,883 dwelling units.

In addition to the development areas of the Project, a network of approximately ten miles of bicycle and pedestrian trails are proposed.

Specific land use includes approximately:

- 380 acres of single family residential units (1,659 units);
- 80 acres of medium density residential units (627 units);
- 32 acres of high density residential units (466 units);
- 48 acres of high density dwelling units within Easton Place (1,544 units);
- 74 acres of commercial mixed-use;
- 117 acres of office, commercial, and civic space;
- 63 acres of parks;
- 57 acres of parkways;
- 40 acres of Valley elderberry longhorn beetle (VELB) off-site preserve ;
- 414 acres of open space (299 acres Alder Creek Parkway Preserve);
- 9 acres of Community Resource Areas;
- 40 acres of school campus;
- 28 acres of detention basin (11 acres in the open space area and 17 acres outside of open space areas); and
- 102 acres of roads.

Alder Creek Parkway Preserve (Preserve):

Approximately 414 acres, collectively called the Preserve, will be established to minimize impacts from the Project. The Preserve will comprise of Open space areas (approximately 299 acres), Passive Recreation areas (approximately 104 acres), and water quality detention basins (approximately 11 acres). Table 1 shows how the Total Open Space and Conservation Easement will be established during each phase of the Project.

Table 1: Summary of Easton Project Open Space and Conservation Easements

Phase	Total Open Space (acres)	Conservation Easement (acres)
Phase 1 & 2	77.2	46.6
Phase 3	59.4	31.4
Phase 4	87.0	46.2
Phase 5	190.2	175.1
Phase 6	0	0
Phase 7	0	0
Phase 8	0	0
Phase 9	0	0
Phase 10	0	0
Total	413.8	299.3

In addition, a 40-acre area to the west of the Project site is proposed as an off-site mitigation area for elderberry shrubs. This area will be managed as part of the Alder Creek Parkway Preserve.

The Preserve areas that contain waters of the United States, waters of the State, and endangered species habitat will be subject to a conservation easement. Although the Passive Recreation Areas, Community Resources Areas and non-graded oak areas will not be subject to a conservation easement, the management and maintenance of these areas will be similar to that in the Preserve areas.

Outfalls and Crossing Structures:

The locations of outfalls and crossing structure associated with Alder Creek are not finalized at the time of this Certification. GenCorp Realty Investment, LLC will submit final plans, when available, to the Central Valley Water Board as a condition of this Certification.

Impacts to Waters:

Delineations mapped 23.16 acres of waters of the United States. The on-site waters of the United States include 0.55 acre of vernal pools, 3.13 acres of seasonal wetlands, 0.05 acre of seasonal wetland swales, 6.99 acres of emergent marsh, 0.56 acre of seasonal ponds, 0.03 acre of seeps, 1.24 acres of ephemeral drainages, 1.43 acres of drainage ditches, and 9.18 acres of perennial creek (Alder Creek). In addition, there are 4.70 acres of non-federal waters of the State (isolated wetlands) mapped on the site.

Of the 23.16 acres of waters of the United States, 5.37 acres will be impacted and 17.79 acres will be preserved within the 300 acres of the Alder Creek Parkway Preserve protected by a permanent conservation easement.

The Project will result in 5.37 acres of permanent impacts to Waters of the United States and 4.70 acres of permanent impacts to waters of the State.

Preliminary Water Quality Concerns: Construction activities may impact surface waters with increased turbidity, temperature, pH, dissolved oxygen and settleable matter.

Proposed Mitigation to Address Concerns: Gencorp Realty Investments, LLC will implement Best Management Practices (BMPs) to control sedimentation and erosion. All temporary affected areas will be restored to pre-construction contours and conditions upon completion of construction activities. Gencorp Realty Investments, LLC will conduct turbidity, temperature, pH, dissolved oxygen and settleable matter testing during in-water work, stopping work if the Basin Plan criteria are exceeded or are observed.

Excavation/Fill Area: Approximately 15,546 cubic yards of clean soil will be placed into 5.37 acres of waters of the United States and 4.70 acres of non-federal (isolated) waters of the State for a total fill of 10.07 acres of waters of the State.

Dredge Volume: None

United States Army Corps File Number: SPK-2004-00515

United States Army Corps of Engineers Permit Number: Individual Permit

California Department of Fish and Game Streambed Alteration Agreement: 1600-2010-0145-R2

Possible Listed Species: Sacramento Orcutt grass, slender Orcutt grass, Vernal pool fairy shrimp, Vernal pool tadpole shrimp, Valley elderberry longhorn beetle.

Status of CEQA Compliance: Sacramento County approved the Environmental Impact Report on 17 December 2008 and filed a Notice of Determination with the State Clearinghouse on 13 December 2011 (State Clearinghouse Number 2005062128).

As a Responsible Agency under California Environmental Quality Act, the Central Valley Water Board reviewed the Environmental Impact Report and found that impacts to water quality were adequately addressed. Through implementation of mitigation at a minimum 1:1 ratio level, impacts to water quality will be mitigated to a less than significant level. Mitigation for impacts to water quality is discussed in the "Proposed Mitigation to Address Concerns" section above, and the "Compensatory Mitigation" section below.

With regard to the remaining impacts identified in the Environmental Impact Report, the corresponding mitigation measures proposed are within the responsibility and jurisdiction of another public agency, and not within the jurisdiction of the Central Valley Water Board.

Compensatory Mitigation: For impacts to 5.37 acres of waters of the United States, GenCorp Realty Investment, LLC must purchase a minimum of 5.37 acres from an United States Army Corps of Engineers-approved mitigation bank. For impacts to 4.70 acres of non-federal (isolated wetlands) waters of the State, GenCorp Realty Investment, LLC must purchase a minimum of 4.70 acres of waters of the State at a mitigation bank approved by the United States Army Corps of Engineers or the California Department of Fish and Game.

In order to compensate for the loss of waters of the State, Gencorp Realty Investments, LLC will purchase mitigation credits for each phase, as indicated in Table 2, prior to the initiation of that corresponding phase.

Table 2: Summary of Easton Wetland Mitigation

PHASE	WETLAND TYPE				TOTAL	
	JURISDICTIONAL		ISOLATED		IMPACTS (acres)	MITIGATION (acres)
	IMPACTS (acres)	MITIGATION (acres)	IMPACTS (acres)	MITIGATION (acres)		
Phase 1 & 2	1.611	1.611	3.520	3.520	5.131	5.131
Phase 3	0.611	0.611	0.785	0.785	1.395	1.395
Phase 4	0.302	0.302	0.339	0.339	0.641	0.641
Phase 5	1.785	1.785	0.061	0.061	1.845	1.845
Phase 6	0.095	0.095	0.000	0.000	0.095	0.095
Phase 7	0.073	0.073	0.000	0.000	0.073	0.073
Phase 8	0.392	0.392	0.000	0.000	0.392	0.392
Phase 9	0.391	0.391	0.000	0.000	0.391	0.391
Phase 10	0.114	0.114	0.000	0.000	0.114	0.114
TOTAL	5.374	5.374	4.704	4.704	10.079	10.079

Gencorp Realty Investments, LLC will establish a 300-acre preserve containing 17.79 acres of preserved waters of the United States on the Project site.

Evidence of this purchase and of a recorded executed perpetual conservation easement grant with Sacramento Valley Conservancy shall be provided to the Central Valley Water Board 30 days prior to proceeding with the activity authorized by this Certification.

Application Fee Provided: Total fees of \$40,000.00 have been submitted to the Central Valley Water Board as required by § 3833(b)(3)(A) and § 2200(a)(3) of the California Code of Regulations.

Figure 1 - Easton Project Area

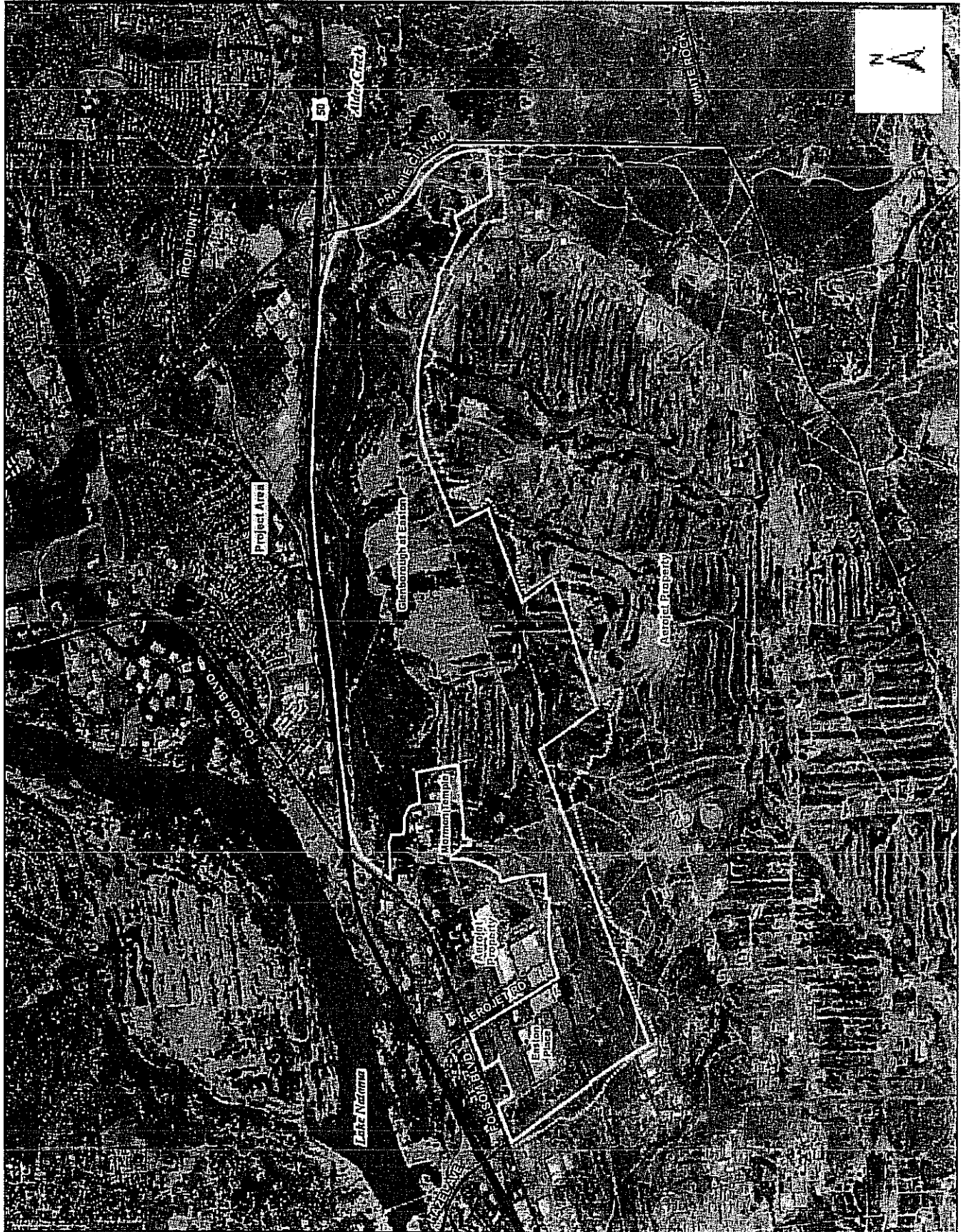
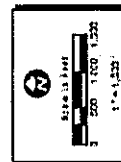
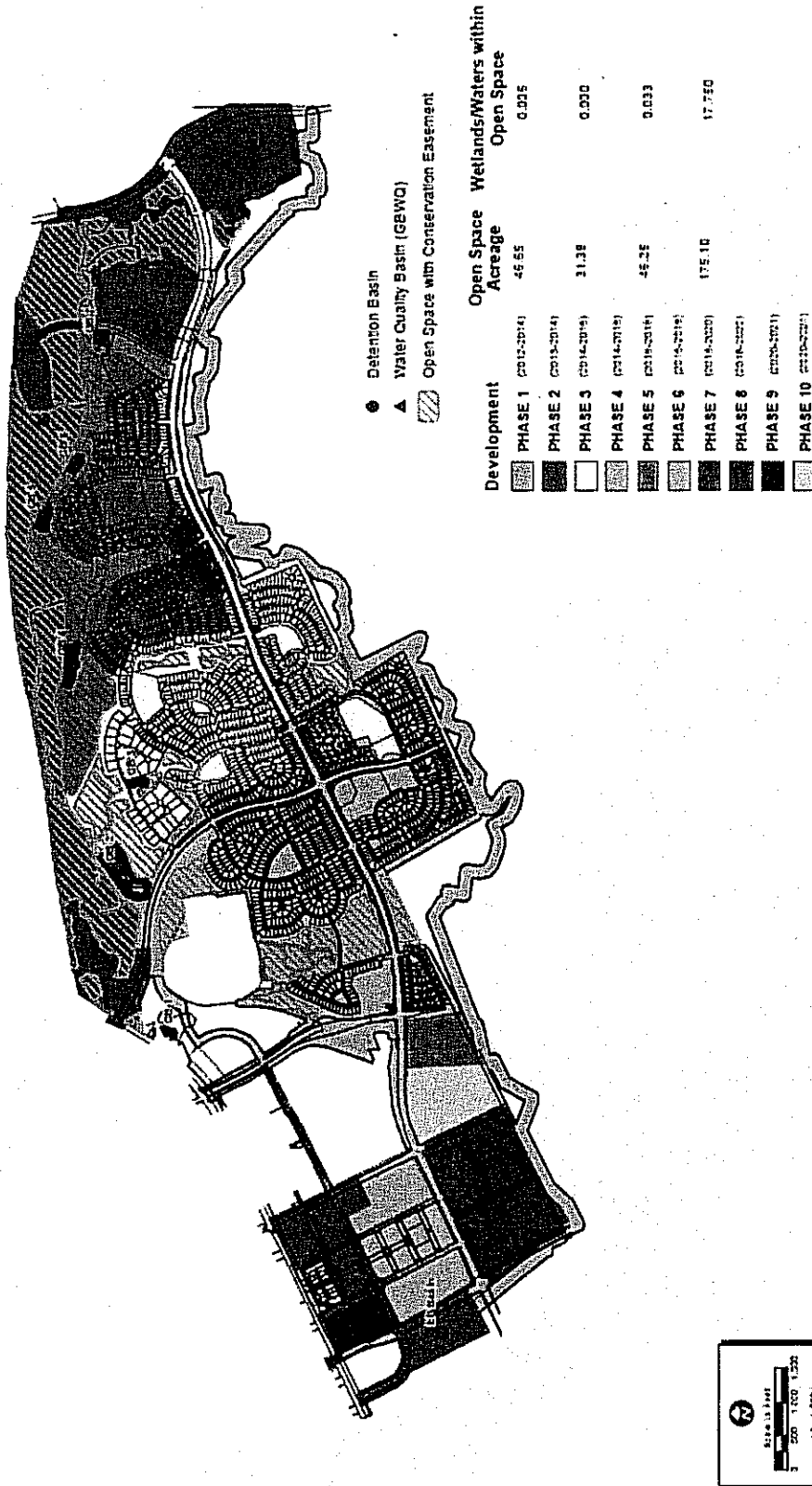


Figure 2 – Glenborough at Easton Place and Easton Phasing Plan



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