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Re: Public Comments on NOP for Draft EIR - Katherine Johnson Middle School SCH# 2022060230

The Sacramento Area Creeks Council seeks to promote public and private care of natural streams. We work for preserving, protecting, restoring and maintaining the natural streams in our urban communities through education, advocacy, financial support and technical expertise. Our goal is to educate the general public on the aesthetic, recreational, educational, and ecological value of our urban creeks. We participate in the decision-making processes that affect the health of area creeks by promoting sound flood control project design, habitat restoration and effective stream bank stabilization methods.

Thank you for the opportunity for our organization to provide comments on the scope and content of the EIR for this project.

Due to the location of the project - adjacent to a local waterway, an open space area and existing neighborhood - it is important that the CEQA document address project impacts and potential measures to mitigate the impacts on these areas. Besides CEQA requirements, the County has policies that should guide the document preparation. Our comments below mention some of those policies as well as resources that would avoid, eliminate, or reduce potentially significant or significant project impacts and provide guidance on feasible alternative projects of lower impact.

### **Aesthetics, Light and Glare**

The NOP states: “The EIR will describe the existing visual conditions and will evaluate the potential impacts on scenic resources and visual character that may result from redevelopment of the project site, as well as impacts related to light and glare. There are no State or locally designated scenic roadways in the project area.” Because new buildings are planned adjacent to existing homes and the Creekside Nature Area, it is important that the EIR consider potential light pollution which affects wildlife and the health of residents. A good resource is <https://www.darksky.org/>

Wildlife impacts to consider and avoid include: Nocturnal animals sleep during the day and are active at night. Light pollution radically alters their nighttime environment by turning night into day. Predators use light to hunt, and prey species use darkness as cover. Glare from artificial lights can also impact wetland habitats that are home to amphibians such as frogs, whose nighttime croaking is part of the breeding ritual. Artificial lights disrupt this nocturnal activity, interfering with reproduction and reducing populations. Many insects are drawn to light, but artificial lights can create a fatal attraction. Declining insect populations negatively impact all species that rely on insects for food or pollination.

- a) Human health impacts include: “Glare from nighttime lighting can create hazards ranging from discomfort to frank disability.” — American Medical Association Council on Science and Public Health (2012)
- b) Safety: Outdoor lighting can decrease safety by making victims and property easier to see. A [Chicago Alley Lighting Project](#) showed a correlation between brightly lit alleyways and increased crime. There is no clear

scientific evidence that increased outdoor lighting deters crimes. It may make us feel safer, but has not been shown to make us safer.

- c) Benefits of dark sky friendly lighting also include less electricity use.
- d) We offer these dark sky friendly lighting resources [Fixture Seal of Approval program](#) and [database of lighting fixtures](#)

## Biological Resources

The NOP states: *Biological Resources—The EIR will define the biological resources in the project area, identify existing habitats, and evaluate the project’s potential effects on wetlands, other sensitive natural communities, and special-status plant and animal species.*

The EIR needs to take into consideration the biological resources of the adjacent Chicken Ranch Slough and Creekside Nature Area as well as the project area to assess potential project impacts to these areas.

1. **Justification includes County General Plan Policy CO-23 - Development approval shall be subject to a finding** regarding its impact on valuable water-supported ecosystems. Address the following:
  - . Address any impacts to adjacent existing stream corridor and associated floodplain managed by Sacramento County and open space area managed by the Fulton-El Camino Recreation and Park District.
  - a. Address impacts from any expanded footprint of the project as well as possible construction impacts that may be projected or foreseen or reasonably predicted that could detrimentally affect the natural stream channel and Creekside Nature Area or its dependent wildlife adjacent to the property.
  - b. Address impacts to possible future protection and restoration of the adjoining open space area.
  - c. Bird species that have been regularly identified using the property of KJMS and/or stream corridor riparian forest include yellow-billed magpie, red shouldered hawk, red-tailed hawk, white-tailed kite, Cooper’s hawk, great egret, snowy egret, scrub jay, acorn woodpecker, Nuttall’s woodpecker, long-eared owl, and wild turkey. The Western Pond Turtle has been observed in Chicken Ranch Slough. Deer, known to inhabit the nearby Del Paso Country Club, have been observed foraging in the vicinity of Chicken Ranch Slough.

2. **County Policy CO-25.** Support the preservation, restoration, and creation of riparian corridors, wetlands and buffer zones.

The environmental document should clearly describe in diagram and in text how the project will interface with the Creekside Nature Area. This requires that the current access be described and then a description of any changes to the existing access. This would also have flood attenuation and groundwater recharge benefits to the region and downstream neighborhoods.

## Hydrology, Hydraulics, Flood Risk, Water Quality

NOP states: *Hydrology and Water Quality—The EIR will evaluate hydrologic and water quality conditions and potential short-term construction-related effects on water quality from stormwater runoff, as well as longer-term effects on stormwater drainage and maintenance effects on water quality. This section will also evaluate potential impacts related to flooding, impacts on groundwater recharge and sustainability, and impacts on surface water hydrology from the addition of impervious surfaces associated with proposed redevelopment. The potential for the project to impede or redirect flood flows will also be evaluated in this section. This section will outline design features, best management practices, and regulatory requirements required to minimize hydrology and water quality effects.*

1. **County Policy CO-30.** Calls out stormwater development/design standards, including hydromodification management and low impact development standards, established pursuant to the NPDES Municipal Permit. Low impact development design and associated landscaping may serve multiple purposes including reduction of water demand, retention of runoff, reduced flooding and enhanced groundwater recharge.  
<https://www.beriverfriendly.net/stormwater-quality-design-manual/>

2. Address any impacts the proposed project will have on the local and regional hydrology through surface hardening. Address Low Impact Development (LID) to avoid, reduce or minimize the project's impacts. This is a critically important issue to meet or improve adaptation of the built environment to address climate change impacts as regional rainfall extremes are modeled and predicted to occur over the next 20-50 years.
3. **County General Plan Water Management for Ecosystems (pg 8 Conservation Element):** The beneficial use of water for urban development and agriculture changes patterns of river and stream flow and water quality, which have impacts on valuable water-supported ecosystems, including riparian and stream ecology and the Sacramento River Delta. The EIR should analyze the potential upstream and downstream impacts related to additional runoff from the new project and ways in which LID protocols, including dual use playing fields/detention basin to reduce impacts to the neighborhood from surface flooding and runoff.
4. **County Policy CO-26.** Protect areas susceptible to erosion, natural water bodies, and natural drainage systems. The County Policy prescribes that this area that includes KJMS and adjacent waterways that will be impacted by changing and adding impervious surfaces, will have possibly significant impacts to the community at large living along the Chicken Ranch Slough creek and flood management system. It would be the appropriate time to review and address additional modifications to the KJMS Project footprint of buildings and hardscape to minimize the storm runoff impacts to the water quality and ecosystem functions within this flood zone. Utilizing Low Impact Development (LID) concepts will help to minimize the hydrologic and hydraulic impact to the stream channel as well as natural groundwater aquifer recharge systems (ecosystem services) of the channel. We recommend review of the building and hardscape footprints to consider all opportunities to minimize hardscapes and augment the natural stream floodplain and channel functions for better water quality, supply and flood management outcomes, which also includes Climate Adaptation benefits.
5. The Central Valley Flood Protection Act of 2008 required the CVFPP to meet multiple objectives, including 14 listed Flood management and habitat conservation objectives (**California Water Code Section 9616[a]**). Specifically, it stipulated that the CVFPP provide “a description of structural and nonstructural means for *enabling or improving systemwide riverine ecosystem function, including, but not limited to, establishment of riparian habitat and seasonal inundation of available floodplains where feasible.*” (Ref. DWR CVFPP Conservation Strategy)  
 The objectives of the State Plan of Flood Control developed by CA Dept of Water Resources addresses ecosystem function protections and conservation through identified actions in collaboration and coordination with regional flood and planning agencies such as Sacramento County. The current KJMS Project EIR needs to sufficiently address this larger State Flood Plan objective for improving flood water management in concert with protection of aquatic ecosystems and their associated wildlife and aquatic organisms of significance to the State. The County General Plan Conservation Elements include companion policy guidance that recognizes the objectives of compliance with the State flood system objectives. The Chicken Ranch Slough watershed and creek system is part of the larger State Plan of Flood Control system and therefore should adhere to and address State and County defined objectives.  
 A KJMS Project that will impact the historic floodplain may provide the County an opportunity to condition the Project to fund restoration of the creek and riparian flood zone and provide additional community flood protection and ecosystem conservation benefits that would also benefit science teaching programs at the proposed school.
6. **County General Plan Objectives - Manage Water to Protect Ecosystems Implementation Measure A.:** *Condition development projects* to provide fair share funding of water-supported ecosystems restoration programs where appropriate. (PLANNING & ENVIRONMENTAL REVIEW, DWR) The County General Plan requires fair funding allocations to address any water-supported ecosystems restoration and conservation or expansion programs in collaboration with other County government offices, such as Parks and Recreation, that may manage such properties for community benefits, as well as align with larger flood system conservation purposes identified by State agencies such as DWR (GP Policy ref above). In early April, the County made it clear to the SJUSD project team that there is a floodplain on the project and the school district must design its project accordingly to ensure there are no adverse impacts. Given the present and projected intensity and frequency of atmospheric river events, the EIR should delineate and quantify the size of the site's bankful discharge, 100-year and 500-year flood plain. Further, the County has told the project team to provide a site plan and associated drainage study that can be reviewed for consistency with the County Floodplain Management Ordinance, Improvement Standards, and other various standards. That information should be shared with the public as part of the EIR process along with proposed mitigation measures. This is best addressed early in the planning process to save project proponent time and money. The County should consider conditioning the KJMS Project to fund protection, conservation,

improved land use planning, and restoration of public resources related to the aquatic and riparian ecosystems bordering the Project property as well as funding public safety aspects including wildfire prevention, vegetation management and wildfire suppression and access for emergency medical and law enforcement vehicles. The San Juan Unified School District (SJUSD) as lead agency needs to conduct further evaluations on the design and impacts of the proposed KJMS Project to assess reducing footprint and hardscape impacts to stormwater runoff and flooding into the Chicken Ranch Slough watershed especially under State and federal assessed Climate Change prediction modeling and downscaling for the Sacramento region.

LID strategies should be fully applied in all possible building and hardscape footprint design alternatives, especially and including designs that minimize the overall hardscape footprint of rooftops and hardscape areas. Mitigation for water quality impacts should require all hardscape surfaces to be constructed with watergarden and runoff infiltration swales and galleries to capture as much runoff as possible and hold it for trapping sediment, pollutants, and cleaning/filtering water before infiltration into the ground. There may be other methodologies that could be applied to use natural features that will reduce and treat stormwater runoff and provide protection to water resources and aquatic environments adjacent to the property.

7. **County General Plan Open Space Element: Keeping floodplains undeveloped is likewise an important way to implement flood protection goals in the Safety Element.**

## **Land Use and Planning and Open Space Protection**

NOP states: *Land Use and Planning—The EIR will describe existing land uses and zoning and evaluate the potential for the proposed project to divide an existing community, or to conflict with existing, adopted land use and natural resource plans or regulations that were adopted for the purpose of reducing or avoiding environmental effects.*

**County General Plan Open Space Element:** Keeping floodplains undeveloped is likewise an important way to implement flood protection goals in the Safety Element. And, preserving open space areas within the fabric of urban development can address Land Use Element policies relating to neighborhood identity and land use conflicts. Indeed, the key role that open space plays in synthesizing land use objectives lends it the distinction as *the only Element where an action plan is specifically required by state law.*

The proposed KJMS Project must fully evaluate the impacts of the development and its footprint to the adjacent public open space that is accessed only across the property of the KJMS Project. This project needs to be fully evaluated for its impacts to and identity of the local adjacent neighborhoods and their identities and needs. Open space in a fully urbanized environment is critical to protect and enhance whenever possible for the public and environmental benefits. The County General Plan Policies identify these issues as priorities for decision making in all development proposals, including schools.

To evaluate the potential conflicts of the KJMS Project with Open Space needs in the local and regional communities (DAC or others) requires further public outreach and engagement to address local neighborhood concerns and requirements. Public safety and community support through Open Space planning is a critical component to any project but especially this one as the direct impacts are foreseeable to existing open space management by the County agencies and should not be skirted for reasons that are outside of public engagement and interests. County and local governments are elected to carry out voter intent and policies and reducing public engagement for “time efficiency sake” of projects is in conflict with elected and board officials in charge of decision making for a community.

The school district has told the public (at its community workshop on June 23, 2022) that the site plan and building design has been set at a single-story concept level to fit with the adjacent neighborhood and that neither the site plan nor the building design will be changed. The EIR needs to address those stipulations, as they appear to 1) conflict with the zoning that applies to the current adjacent single family dwellings, duplexes, apartments and commercial properties in the immediate vicinity and 2) work against mitigation that could be achieved with reduced building footprint(s) associated with a multi-story design concept. Because of recent changes in state law in response to substantial shortages of housing at all price levels (market rate, affordable, low-income and homeless) the EIR should also address the County Housing Element and the upzoning potential for increased housing density in the immediate area.

## **Cultural and Tribal Cultural Resources**

NOP states: *Cultural and Tribal Cultural Resources—The EIR will describe any existing cultural and Tribal Cultural Resources and evaluate potential impacts on those resources, including the potential to affect undiscovered resources during excavation and grading. The EIR will be informed by consultation with California Native American tribes to assess potential impacts on Tribal Cultural Resources*

County Policy CO-32. Support programs and activities conducted by watershed groups and citizen volunteers that help to ensure compliance with the NPDES Municipal Permit by increasing public awareness and encouraging stewardship of water resources.

EIR preparers need to engage and ask for input or review by the local communities, including but not limited to Watershed and Creek Stewardship groups or DAC communities specifically adjacent or impacted by the redevelopment proposal. We request that the KJMS Project leadership conduct a complete and thorough community outreach and communications planning effort to gather community input into the KJMS design parameters. This is required to fully address building and property footprint and design aspects that would more completely address community values and needs.

## **Greenhouse Gas Emissions and Climate Change**

NOP states: *Greenhouse Gas Emissions—The EIR will include a description of the current science surrounding climate change. The EIR will quantify greenhouse gas (GHG) emissions for construction and subsequent operation based on the proposed middle school use. Emissions estimates will be evaluated for consistency with the State legislative framework for reducing GHG emissions reductions.*

County Policy CO-22. Support water management practices that are responsive to the impacts of Global Climate Change. The EIR should suggest playing fields and any other water intensive uses that are part of the project.

## **Population/Housing/Homelessness/Disadvantaged Communities/Environmental Justice**

The NOP states: *Population and Housing—The EIR will evaluate the potential for the proposed redevelopment to induce substantial unplanned population growth. Because the project site has been developed as a school since 1953, no impacts are anticipated related to displacing substantial numbers of housing units or people that could lead to potentially significant physical environmental effects.*

However, the school district made it clear to the public at the June 23, 2022 community meeting that traffic to and from the site was expected to conflict with use of adjacent streets for parking. Since on street parking in the immediate vicinity is associated with multi-family dwellings, a child care facility and an assisted living facility, the EIR should speak to how the adjacent population and housing will be affected by the traffic associated with the project and identify appropriate mitigation measures.

1. County General Plan - Environmental Justice Element - Prioritize “Complete Projects” for EJ Communities. Remodel streets for transit, pedestrian and bicycle use as well as vehicles. There is a lack of focus on prioritizing money to EJ communities for sidewalks and bike facilities.
  - This specific GP EJ planning goal is directly from community outreach feedback for the Arden-Arcade area. Therefore, it is the County’s priority to make sure this action is addressed in all development proposals for the Arden-Arcade Area. This would call for additional public meetings set for the area residents for a time and location that will ensure neighborhood public engagement and participation. This has not been adequately addressed by the SJUSD project proposal to date. Therefore, we recommend extending public comment timeframes to allow for SJUSD to add new times and locations to gather public and neighborhood input to the KJMS Project planning effort.

- The County’s EJ goals set a priority to address procedural inequities that lead to lack of participation by residents of EJ Communities in the decision-making process.
  - The SJUSD needs to do further DAC community outreach for planning needed improvements to access for the proposed school so that families and school kids have safe and useful access to and away from the school grounds.
  - This would require the SJUSD to conduct additional community engagement project planning and design meetings to get meaningful input from the neighborhoods surrounding the project and for the area the school would service. This outreach could address both transportation needs and public safety improvements to access the school location. There is a greater need for junior high schools to fully consider and plan for safe walking and bicycling access for kids attending the school. This is especially important for DAC neighborhoods that may have limited access to cars. As well, the plans for transportation need to consider the mix of bus, car, bike and walking access pathways to make sure all routes that kids may take are safe and protected from vehicular traffic. (See Transportation Section)
2. County General Plan - Environmental Justice Element EJ-3. Sacramento County acknowledges the distinction and significance of archaeological resources and tribal cultural resources. Sacramento County recognizes the expertise of both qualified professional archaeologists and California Native American Tribal representatives who may have knowledge regarding tribal cultural resources.
- Native Americans have a long history of living along many waterways of the Sacramento Valley. The KJMS Project EIR needs to conduct a thorough review with tribal representatives that have a history in the region to help identify any culturally significant sites that might be located on or near the project site. If heritage sites of significance are identified, the District, County or State would need to work with the tribal liaisons and representatives to identify appropriate actions to protect or acknowledge the site’s significance to Native American history of the area.
- We request that appropriate cultural Native American engagement and surveys be conducted prior to completing any plans for the proposed project site.
- Appropriate mitigation could include but would not be limited to developing historical review reports and information signage that describes the history of local Native American tribal occupation in the region or specifically at this location prior to European-American settlement and development.

## Recreation

The NOP states: *Recreation—The EIR will describe existing recreational facilities in the project area, and will evaluate whether the proposed middle school would result in an increased demand for recreation facilities, and whether any increased use of existing neighborhood and regional parks or other recreational facilities would result in substantial physical deterioration of such facilities.*”

1. *Sacramento County General Plan - Open Space Element - Stream and Canal Corridors*: Undeveloped areas along streams and canals that provide a buffer between the water and nearby development and can be used as pedestrian trails and/or wildlife corridors.
2. *SCGP Open Space Element - Natural Resources*: Areas that provide important ecological functions such as wetlands, floodplains, vernal pools, and urban forests. They may also offer educational opportunities for urban residents. This includes areas designated as Natural Preserves on the County’s Land Use Diagram.
3. The following land uses *are not* considered urban open space by the County. This list is not a comprehensive inventory but provides some basis for a better understanding of what is not considered open space by the County.
  - Required elements within a development such as private park and yard areas.
  - Land dedications required for public infrastructure such as strips of land adjacent to roadways, drainage canals or utilities, that do not provide for recreational and/or habitat uses.
4. *Sacramento County Open Space/Rural Principles* - Sacramento County has significant high quality natural/rural areas devoted to agriculture, natural resource protection, and recreational uses. As development continues to occur, it is important to protect these areas as they provide valuable habitat for both humans and wildlife as well

as help retain the rural character of the County that makes it a desirable place to live. To meet this objective, Sacramento County has identified five open space/rural principles that serve as the basis for the Open Space Vision Diagram.

- *Floodplain Protection:* As the County becomes more developed, rainfall runoff will become more of a challenge resulting in increased flooding and expanding 100 year floodplains for area creeks. Limiting the number of development projects within floodplains will provide protection from flooding and help to maintain the integrity of the County's water quality and the regional water supply.
- *Habitat Preservation:* Sacramento County is home to numerous threatened and endangered species and their habitats. Protection of vernal pools, wetlands, creeks, oak woodlands, and other native plant communities throughout Sacramento County will aid in the preservation/recovery of these species. Protecting these areas from encroaching development projects and incompatible uses will aid in the prevention of floods, preservation of endangered species, and provision of open space areas. These areas can also act as greenbelts and enhance residents' overall quality of life by providing a distinct community identity.
- *Greenbelts/Parkways:* Maintaining areas for passive and active recreation contributes to the overall health and well being of County residents. Trails and parkways encourage pedestrian and bicycle travel while providing connectivity between open space areas. Through the incorporation of public use open space within development projects, above state requirements, a valuable sense of place is also created.

5. Parkway Public Access to Open Space Comments

- The KJMS Project property adjoins protected urban open space park land (the Creekside Nature Area) and provides the only public access point to the park area across a de facto public easement path and pedestrian bridge. It is critical to the public enjoyment and accessibility of the park to maintain and enhance this access - including modifications for ADA access - through the KJMS Project site for both public use, site maintenance and even school science education class uses that would be made available to students and researchers across the metropolitan region.
- Potential mitigation could include but is not limited to improving public pathways across the KJMS property to the park area. Improving and augmenting the existing pedestrian bridge to allow for pedestrian and emergency vehicle access for fire-fighting and public safety routes into or out of the park area, ADA access and improved pathway maintenance and development through to the public natural park lands for public enjoyment and use.
- As identified in the GP Open Space Report, development projects are identified as the specific times that the County has the appropriate opportunity to protect and develop new or additional public open space to create "valuable sense of place" and for residents' overall quality of life. As well, the expansion of habitat corridors along the creek channel provides additional values to limited riparian forest habitat and species that require those habitats to survive in urban environments. The County should consider its role and responsibilities under this General Plan Open Space Element to minimize the potential for this KJMS Project to impact existing and new potential open space next to a school and through neighborhoods (DAC specific impacts). Mitigation for new school development should include protection and possible expansion of the existing creek and riparian floodplain habitat and public access improvements.

## **Transportation**

NOP states: *Transportation—The EIR will identify existing conditions, existing plus project conditions, cumulative no project conditions, and cumulative plus project conditions. The EIR will summarize an analysis of vehicle miles traveled (VMT) related impacts of the proposed project, and explain that all adverse physical environmental impacts associated with VMT are included in the air quality, greenhouse gas emissions, and other relevant topic sections of the EIR. The proposed project site plan will be evaluated for access and onsite circulation, including interface with the public roadway network, emergency vehicle access and circulation, and pedestrian and bicycle access and circulation within and adjacent to the site. The EIR will include an evaluation of the project's consistency with the County's multi-modal transportation policies.*

The second goal addresses procedural inequities that lead to lack of participation by residents of EJ Communities in the decision-making process.

## Wildland Fire Hazards/Public Safety

NOP states: *Wildland Fire Hazards — The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, the EIR will explain why no significant impacts related to wildland fire hazards would occur.*

We dispute this statement. The site includes vegetation along its northeastern, northern, northwestern and western boundaries that are susceptible to wildfire during the dry season and the site is adjacent to the Creekside Nature Area that has similar wildfire risks. The EIR should address the wildfire risks inherent at the site that can pose potential harm to adjacent lands and buildings.

## Alternatives

One of the Alternatives should include LID design, dark sky friendly lighting, and a reduced footprint to lessen impacts on the creek, Creekside Nature Area and neighborhood.

## Exhibits

All exhibits showing the proposed project and alternatives should include the existing development footprint and quantify the change in impermeable surface from existing to proposed.

## Documentation & References

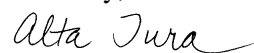
*Contact Persons:*

*Additional Reference Documents and Links:*

- Sacramento County General Plan - Conservation Policies  
(<https://planning.saccounty.net/LandUseRegulationDocuments/Documents/General-Plan/Conservation%20Element%20-%20Amended%2009-26-17.pdf>)
- California Department of Water Resources Central Valley Flood Protection Plan Conservation Strategy (2021).  
[https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Flood-Management/Flood-Planning-and-Studies/CVFPP-Conservation-Strategy/Files/2022-CS-Update-and-Appendices/Conservation\\_Strategy\\_Update\\_with-Appendices.pdf](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Flood-Management/Flood-Planning-and-Studies/CVFPP-Conservation-Strategy/Files/2022-CS-Update-and-Appendices/Conservation_Strategy_Update_with-Appendices.pdf)
- Sacramento County General Plan - Open Space Element
- <https://planning.saccounty.net/LandUseRegulationDocuments/Documents/General-Plan/Open%20Space%20Element%20-%20Amended%2009-26-17.pdf>
- Sacramento County General Plan - Office of Planning and Environmental Review, Environmental Justice Element
- <https://planning.saccounty.net/PlansandProjectsIn-Progress/Documents/General%20Plan%202030/Environmental%20Justice%20Element.pdf?csf=1&e=1VDeDp>

Any questions regarding the above letter should be directed to me, AltaTura, [saccreeks@gmail.com](mailto:saccreeks@gmail.com), 916 454-3544.

Sincerely,



Alta Tura  
President

ec: FECRPD attn. Emily Ballus