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June 21, 2021

**SENT VIA EMAIL (CityClerk@cityofranhocordova.org)**

Hon. Garrett Gatewood, Mayor and  
Members of the City Council  
c/o City Clerk  
City of Rancho Cordova  
2729 Prospect Park Drive  
Rancho Cordova, CA 95670

**RE: Rancho Cordova June 21, 2021- City Council Meeting  
Agenda Item 11.1 - Adoption of the 2021-2029 Housing Element  
Update, and Addendum to the City's General Plan Financial  
Impact Report**

Dear Mayor Gatewood and Members of the City Council:

These comments are submitted on behalf of the Tiffany Farms Homeowners' Association regarding the City's adoption of the 2021-2029 Housing Element Update and the Addendum to the City's General Plan Final Environmental Impact Report ("Addendum") for the Housing Element Update. These comments relate specifically to the Housing Update's treatment of the Kassis property, which is identified as site C-1.

The 2013-2019 Housing Element Update includes only ten acres of the Kassis property within the identified "vacant infill sites" identified in Table A-20. The "comments" section of Table A-20 clarifies "10 acres of Folsom Blvd frontage (Assumes 80% of 30 du/acre for 10 acres)." (See 2013-2019 Housing Element, p. 35.) This is appropriate since the approximately 20 acres of the balance of the Kassis property is located in the 100-year floodplain and consists primarily of black walnut trees providing habitat for various species, including special status species, and thus unsuitable to development. This portion of the Kassis property in the floodplain was also excluded from consideration for development in the Mitigated Negative Declaration prepared to re-designate the Kassis Property from Agricultural to Residential Mixed Use as part of the adoption of the Folsom Boulevard Specific Plan.

Consistent with the 2013-2019 Housing Element, the public review draft 2021-2019 Housing Element includes the same description of the Kassis property in Table A-

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20 (p. 31), and also includes a figure identifying only the southernmost 10-acre portion of the Kassis property. (See Exhibit 1, “Attachment 3, Sites Inventory – Map 2”.)

The “final approval” version of the Housing Element 2021-2029, however, includes a modified figure including the entire Kassis property (i.e., not limited to the southernmost ten acres fronting Folsom Boulevard) and also eliminates from Table A-20 the clarifying comment “10 acres of Folsom Blvd frontage.” Thus, while the “final approval” version of the Housing Element Update 2021-2029 confirms that only ten acres of the Kassis property is within the City’s housing needs assessment, there is some question regarding whether it is the same ten acres as previously identified.

We are well aware of Trumark’s proposal to develop the entire Kassis property, including a portion adjacent to the American River and within its 100-year floodplain. In light of this, we ask the City confirm that the ten-acre portion of the Kassis property described in Table A-20 remains the same southernmost ten acres identified in Exhibit 1. If the City were to include a different ten-acre portion of the Kassis Property within the 2021-2029 Housing Element in light of the application already submitted by Trumark, this would represent a change in the Housing Element triggering the need to include an evaluation of the Trumark proposal’s environmental impacts to avoid a project piecemealing challenge. (*Black Property Owners Assn. v. City of Berkeley* (1994) 22 Cal.App.4th 974, 985; CEQA Guidelines, § 15378, subd. (c).) Including the required analysis of Trumark’s development proposal would implicate new and exacerbated environmental impacts for resources including, but not limited to, biological resources, hydrology and flooding, and land use that would make reliance on a CEQA Addendum improper here.

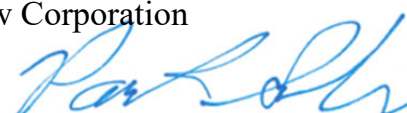
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We thank you in advance for clarifying this issue, which will avoid a concern about the City impermissibly piecemealing its environmental review of the proposed Trumark development.

Very truly yours,

**SOLURI MESERVE**  
A Law Corporation

By:

  
Patrick M. Soluri

PS/wra

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Attachments:

Exhibit 1: Attachment 3 to Item 15.1, Public Review Draft 2021-2029 Housing Element Update, “Sites Inventory – Map 2”

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