3.1 INTRODUCTION

The chapter presents the details of the proposed El Dorado Hills Apartments project in terms of the project's location and setting, project objectives and characteristics, and construction schedule and activities. The project applicant, Spanos Corporation (applicant) has applied to the County of El Dorado for approval of the proposed project ("proposed project") and related entitlements.

The applicant proposes to construct a 4-story, 214-unit apartment complex, comprising two apartment buildings, a parking structure, outdoor recreation areas, and an informal open space area.

3.2 PROJECT SETTING

3.2.1 Project Location and Surrounding Land Uses

The unincorporated community of El Dorado Hills is located in western El Dorado County (see **Figure 3.0-1, Project Location**). The project site is located in El Dorado Hills, approximately 500 feet south of U.S. Highway 50 (U.S. 50), approximately 23 miles east of downtown Sacramento and 60 miles southwest of Lake Tahoe. Folsom Lake is located approximately 4 miles to the northwest.

The approximately 4.56-acre project site, located on the northwestern corner of the intersection of Town Center Boulevard and Vine Street within the Town Center East Commercial Center in El Dorado Hills, is presently vacant. The site is bounded by Town Center Boulevard to the south, Vine Street to the east, Mercedes Lane to the north, and an open space area that includes Town Center Lake to the west.

The area surrounding the project site is fully developed and consists mainly of retail/commercial uses. An automobile dealership is to the north of the project site, across Mercedes Lane. Other retail/commercial uses are located to the east across Vine Street, which include restaurants and a movie theater (the Regal Cinemas El Dorado 14 and IMAX), and to the south across Town Center Boulevard, which include a Target store and other retail, restaurant and commercial businesses. Town Center Lake is immediately adjacent to the project site to the west. An El Dorado Sheriff's Department field office is located approximately 1,200 feet to the west, along Town Center Boulevard. The Blue Shield of California campus is further west, across Latrobe Road.

3.2.2 Existing Site Conditions

The project site consists of three parcels, Assessor's Parcel Numbers 121-290-60, 121-290-61, and 121-290-62. Under the County of El Dorado General Plan, the site is designated 'AP' (Adopted Plan), as the site is

located within the adopted El Dorado Hills Specific Plan (EDHSP) area (see Figure 3.0-2, General Plan Land Use Designation). In adopting the nearly 4,000 acre EDHSP, the County of El Dorado designated the area that includes the project site as Villages T and U (see Figure 3.0-3, EDHSP Village U and T Location Map and Figure 3.0-4, EDHSP Village T Planning Area Locations). Known collectively as the El Dorado Hills Town Center, these villages were "intended to provide for commercial uses of greater variety and at a higher intensity than provided elsewhere in the Specific Plan area or in the greater El Dorado Hills/Cameron Park area." Village T is now known as 'Town Center East' (TCE). The site is designated 'Commercial' in the EDHSP. All three project parcels are zoned CG-PD (General Commercial, Planned Development). Refer to Figure 3.0-5, Existing and Proposed Specific Plan Designations, and Figure 3.0-6, Existing and Proposed Zoning.

The project site ranges in elevation from approximately 605 to 620 feet above mean sea level and slopes gently east to west. The site is vacant and undeveloped, but indications of previous disturbance, including mass grading, are present. The vegetation on the project site is characterized as disturbed, non-native annual grassland; no large shrubs or trees are present on the site.

According to the geotechnical investigation prepared for the site, the native subsurface profile below the fill generally consists of soft sandy silts with minor organic material underlain by very dense metavolcanic rock. The permanent groundwater table is generally below 100 feet of the existing site grades. However, during and following the rainy season, perched water may exist within fractures or on top of the metavolcanic rock, due to the relative impermeable nature of the underlying rock.

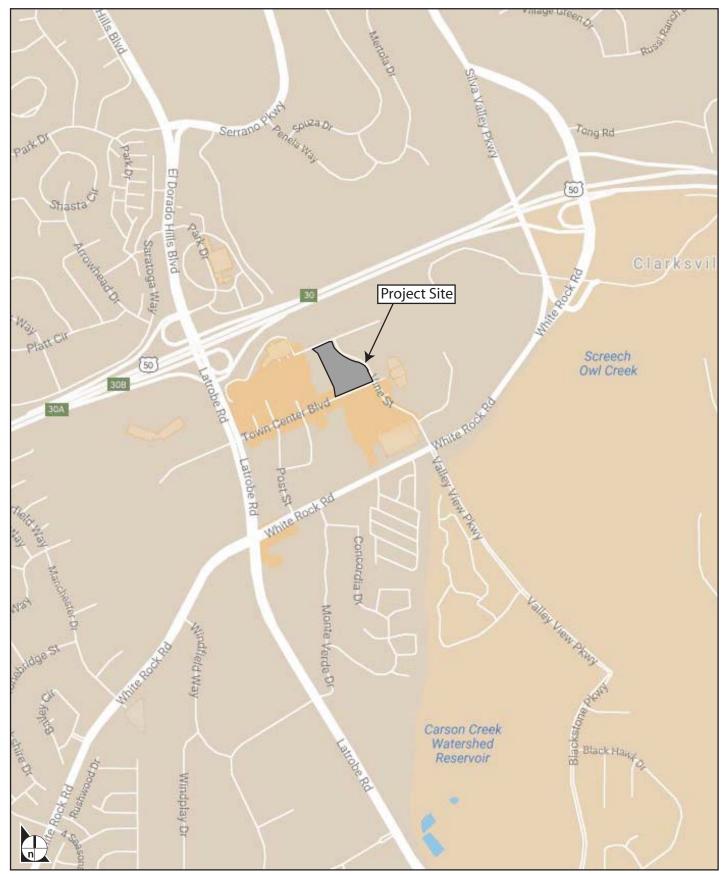
3.3 PROJECT OBJECTIVES

The objectives of the project are to develop a well-designed, economically feasible residential community that consists of a variety of residential unit types and incorporates smart growth elements. The applicant's key objectives for the proposed project are to:

- Implement the County's General Plan by directing growth to areas that are already developed with
 existing access to services, schools and transportation systems in order to preserve agricultural land
 and open space;
- Implement goals and objectives of the El Dorado Hills Specific Plan;¹
- Provide a residential population to support commercial development within the Town Center East Planned Development area;

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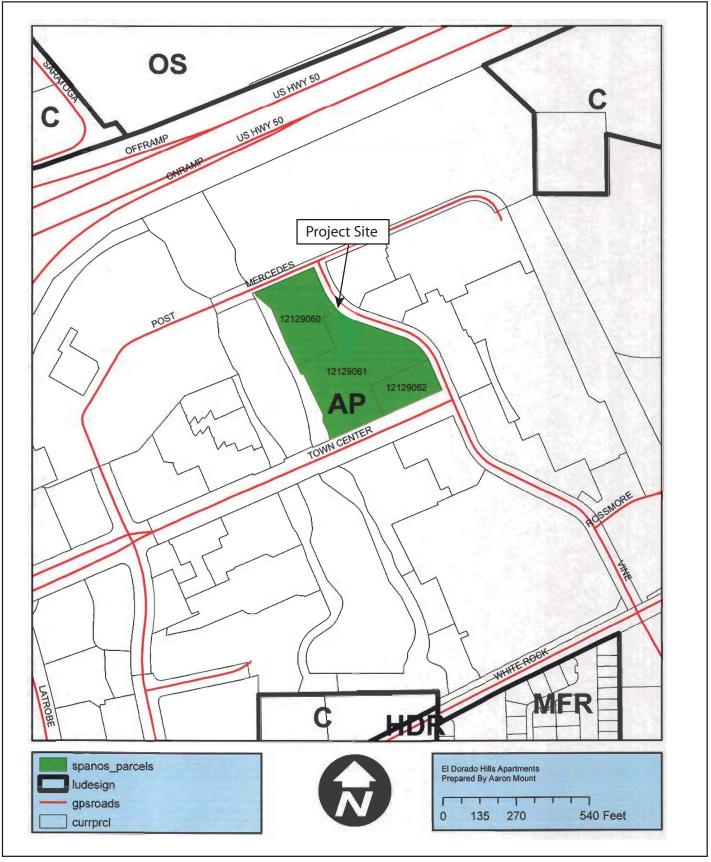
See http://www.edcgov.us/Government/Planning/Zoning_Ordinances_for_Specific_Plans.aspx#El%20Dorado% 20Hills for the goals and objectives listed in the El Dorado Hills Specific Plan.



SOURCE: Google Maps, 2017

FIGURE 3.0-1

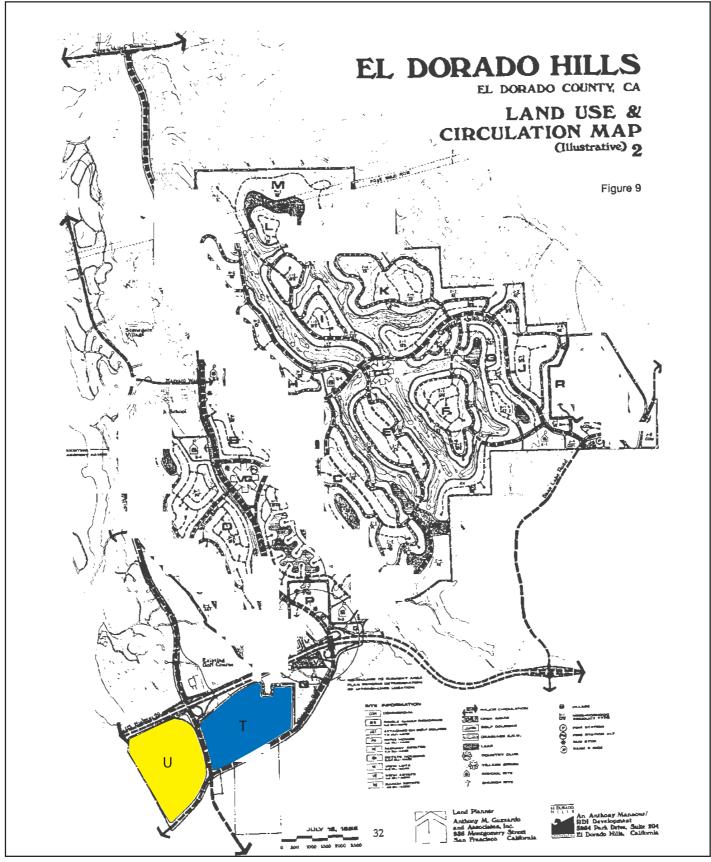
IMPACT SCIENCES **Project Location**



SOURCE: County of El Dorado

FIGURE 3.0-2

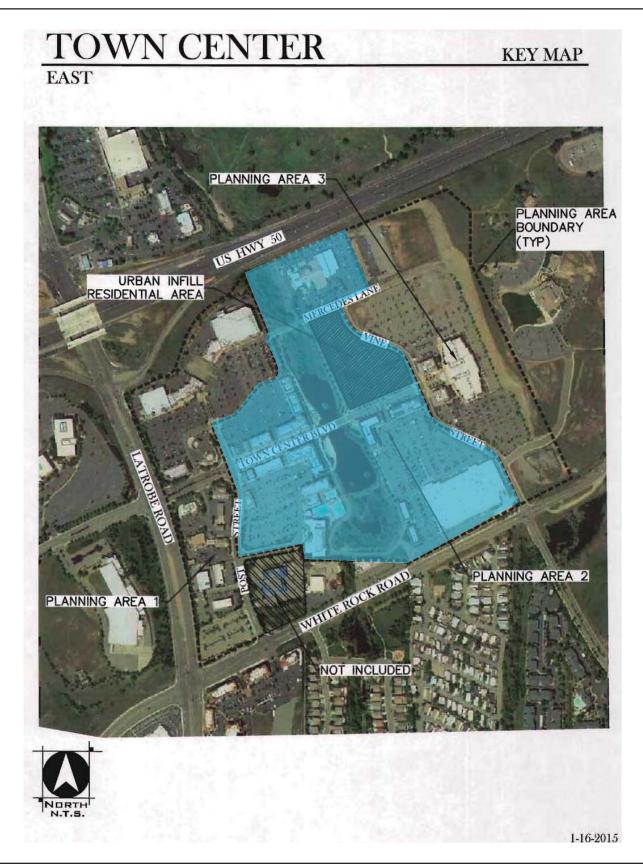
General Plan Land Use Designation



SOURCE: County of El Dorado

FIGURE 3.0-3

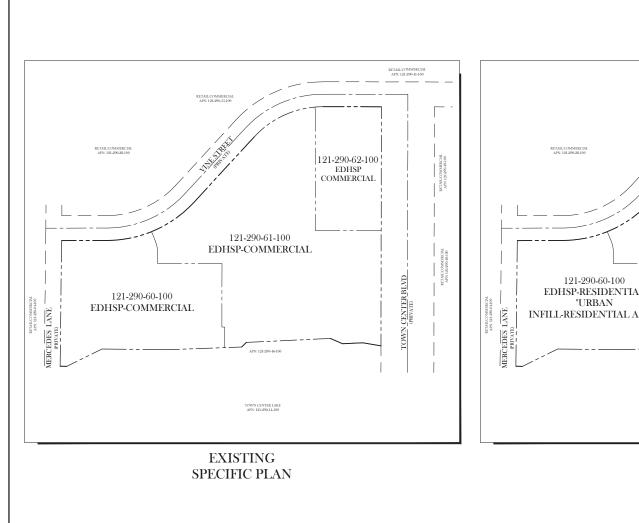


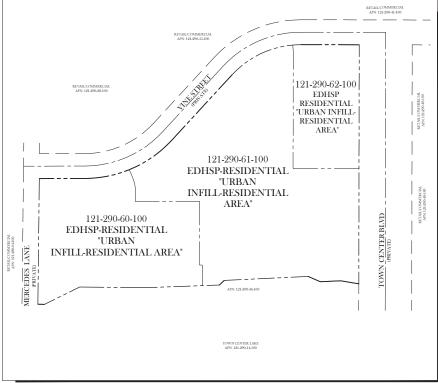


SOURCE: County of El Dorado

FIGURE **3.0-4**







PROPOSED SPECIFIC PLAN



SOURCE: Kephart, 2017

FIGURE 3.0-5

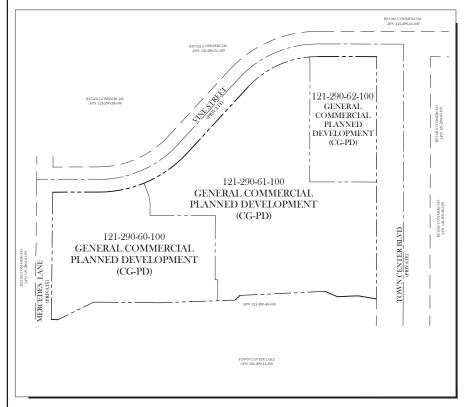
Existing and Proposed Specific Plan Designations

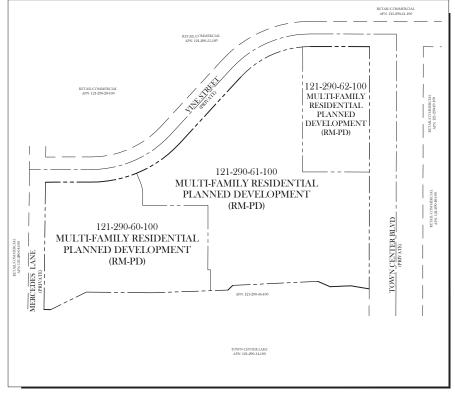


REZONE EXHIBIT

EL DORADO HILLS APARTMENTS

TOWN CENTER EL DORADO COUNTY, CA





EXISTING ZONING

PROPOSED ZONING



SOURCE: Kephart, 2017

FIGURE **3.0-6**

Existing and Proposed Zoning



- Assist in increasing the housing supply in El Dorado County to improve the job-housing imbalance, including housing that is more affordable;
- Implement smart growth principles by developing underutilized properties with higher density housing projects.
- Develop a sustainable community that incorporates smart-growth elements, places higher-density housing in close proximity to job centers, and complements adjacent commercial uses; and
- Create a residential development that maximizes density with accessibility to alternate transportation modes, and integrates pedestrian, bicycle, transit, open space and outdoor uses to encourage active centers.

3.4 PROJECT CHARACTERISTICS

3.4.1 Project Components

The proposed project would develop a multifamily residential project on the approximately 4.56-acre site. The 214-unit apartment complex would consist of two apartment buildings, a parking structure, outdoor recreation areas, and an informal open space area. The project components are shown in **Figure 3.0-7**, **Site Plan**.

Apartment Buildings

The proposed project includes 214 rental apartment units and would have an overall density of approximately 47 dwelling units per acre. The apartment units would range from 576 square feet to 1,195 square feet in size, with a mix of 114 studio/1-bedroom units and 100 2-bedroom units. The residential unit mix is summarized in **Table 3.0-1**, **Residential Unit Mix Summary**.

Table 3.0-1 Residential Unit Mix Summary

| Number of | | | Mix |
|--------------------------|-------|-----------------|-----------|
| Housing Type | Units | Unit Size (nsf) | (Percent) |
| Studio/One-Bedroom Units | 114 | 576 to 930 | 53.3 |
| Two-Bedroom Units | 100 | 1,022 to 1,195 | 46.7 |
| Totals | 214 | | 100 |
| | | | |

Source: Spanos Corporation, 2017 Notes: ns f= net square feet

The apartment units would be located in two residential buildings (Buildings 1 and 2) and the leasing office would be located in Building 2, near the corner of the building near the Town Center Boulevard

and Vine Street intersection. The residential buildings would be 4 stories high, with the building heights varying between 42 and 52 feet due to the approximately 15 foot elevation change from east to west on the project site. Some architectural elements of the two residential buildings would be up to 60 feet high.

Parking Structure

A 5-story parking garage would be located in the center of the project site between Buildings 1 and 2. The total garage area would be approximately 122,500 gross square feet (gsf) (approximately 30,625 square feet/level). The parking garage would provide a total of 409 vehicle parking spaces and 22 motorcycle parking spaces for residents and visitors. Entrances to the parking garage would be on Vine Street and Town Center Boulevard.

Outdoor Recreation Areas

The proposed project would include three outdoor recreation areas, as further described below and shown on Figure 3.0-8, Preliminary Landscape Plan.

Interior Courtyard

This courtyard would be located between Building 2 and the parking garage. Amenities in this area would include a natural gas fire pit with built-in seating on two sides, an arbor area designating a BBQ area, and a patio area allowing for informal seating and table arrangements. This area would be relatively shady during most of the day, requiring plant materials to be sustainable under low light conditions. The design theme for this area would be 'woodland' in nature consisting of bold leaf shrubs, perennials, and ornamental grasses. Selected trees would generally be deciduous, broad leaf varieties.

Pool Area

The pool area would be located adjacent to the west side of Building 1 and would have a view of Town Center Lake. This area is designed to provide multiple areas for recreation and lounging. Entry to the pool area would be from two locations, the main lobby area, and the clubhouse area. Stairs would provide access between the elevation differences, with ramps both inside and outside the clubhouse providing accessibility for all.

The lower area associated with the clubhouse would include a natural gas fire pit, lounge area, BBQ arbor area, and areas for informal seating and table setups for resident events. The pool area would be access-controlled by gates and low fencing in order to control the hours of use, while still allowing the outdoor lounge and fire pit area (next to the clubhouse) to be used "after hours."

Plant materials utilized around the pool would be selected for their compatibility with the pool (low maintenance, soft texture, color, etc.) and low to medium water use. Tall and narrow deciduous and smaller flowering trees would be planted to provide shade and color. A small lawn area furnished with tent cabanas and umbrellas would be included to provide opportunities for shade and lounging.

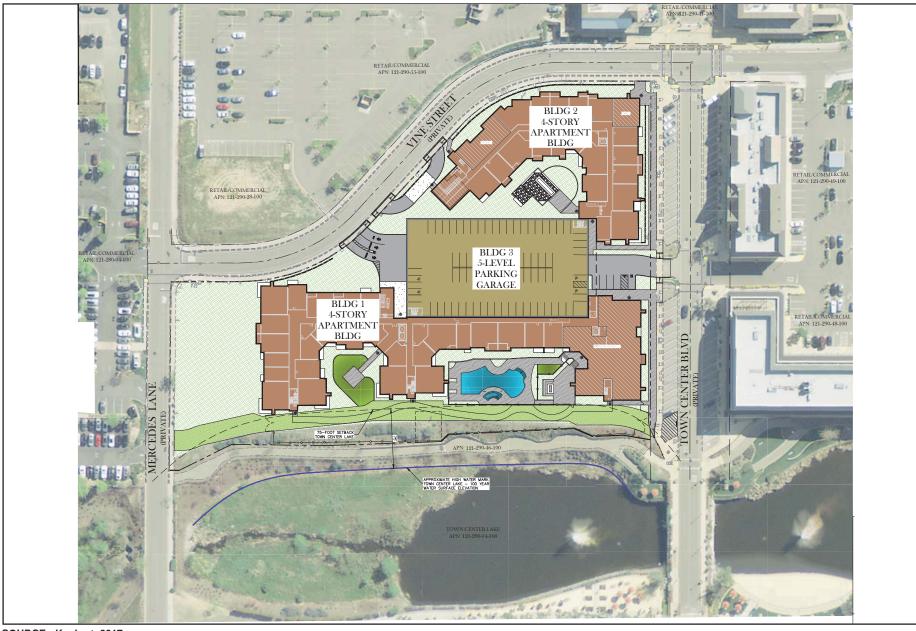
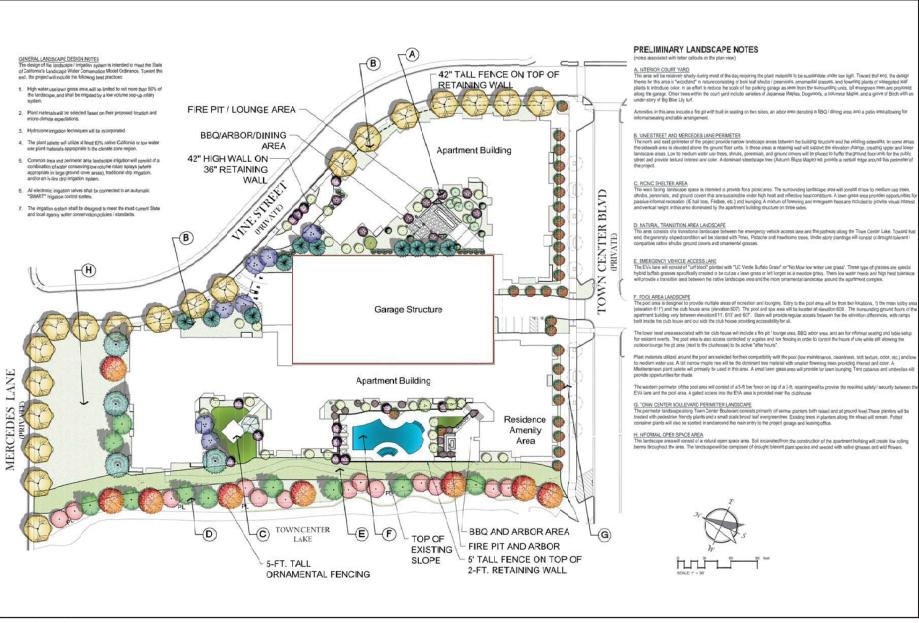


FIGURE 3.0-7

Site Plan



SOURCE: TSD Engineering, Inc., 2017

IMPACT SCIENCES

Preliminary Landscaping Plan

FIGURE **3.0-8**

The western perimeter of the pool area would consist of a 5-foot low fence on top of a 2-foot retaining wall to provide the required safety and security between the emergency vehicle lane and the pool area. Gated access into the emergency vehicle lane would be provided near the clubhouse.

Picnic Shelter Area

This west-facing landscape space would be on the west side of Building 1, north of the pool area. This area is intended to provide for a picnic area. The surrounding landscape area would be planted with low to medium water use trees, shrubs, perennials, and ground covers that are sustainable under reflective heat conditions. A lawn grass area would provide opportunities for passive informal recreation (e.g., ball tossing, Frisbee, etc.) and lounging. A mixture of flowering and evergreen trees would provide shade, visual interest, and vertical height in this area dominated by the apartment building structures.

Informal Open Space Area

This approximately 0.51-acre open space area would be located between the northern end of Building 1 and Mercedes Lane. Soil excavated from the construction of the apartment buildings and the garage would be used to create low rolling berms throughout the area. This area would be seeded with native grasses and wild flowers with drought tolerant plant species along the perimeter of the area.

Other Landscaped Areas

The north and east perimeter of the project site along Mercedes Lane and Vine Street would provide narrow landscaped areas between the building structures and the existing sidewalks. In some areas the sidewalk area would be elevated above the ground floor units. In these areas a retaining wall would support the elevation change, creating upper and lower landscape areas. Low to medium water use trees, shrubs, perennials, and ground covers would be placed to buffer the ground floor units from the public street and provide textural interest and color. A dominant streetscape tree would provide a vertical edge around this perimeter of the project.

The perimeter landscape along Town Center Boulevard would consist primarily of narrow planters both raised and at ground level. These planters would be planted with pedestrian friendly plants and small scale broad leaf evergreen trees. Existing trees in planters along the street would remain. Potted container plants would be placed in and around the main entry to the project garage and leasing office.

The site perimeter along Town Center Lake would consist of an emergency vehicle access (EVA) lane and a natural transition area. The EVA would run parallel to the west side of Building 1. It would not be a paved surface but would consist of turf blocks of special hybrid grasses specifically cultivated to be cut as a lawn grass, but may be allowed to grow taller as a meadow grass. The EVA lane would provide a transition area between the more ornamental landscape around the apartment complex and the natural transition area (see below).

Between the EVA lane and the existing paved pathway along the lake, the generally sloped area would serve as a natural transition area and would be landscaped with pines, pistache and hawthorn trees. Under-story plantings would consist of drought tolerant native shrubs, ground covers, and ornamental grasses.

3.4.2 Building Design

As noted above, the two residential buildings would be between 42 and 52 feet in height, with some architectural elements reaching 60 feet. Parking would be provided in a 5-level parking structure. The parking structure would be located in the center of the project site and flanked on two sides by the proposed residential buildings. Project site plans are provided in **Figures 3.0-9** through **3.0-12**.

The design concept for the proposed project would include varied architectural finishes, including stone veneers and stucco. Decorative elements, including decorative wrought iron railing and awnings, would be incorporated to add visual interest. Building materials would be non-reflective. **Figures 3.0-13** through **3.0-15**, **Illustrative Project Elevations**, show the exterior elevations along Town Center Boulevard, at the corner of Town Center Boulevard and Vine Street, along Vine Street, at the corner of Vine Street and Mercedes Lane and views of the greenbelt/EVA lane from Mercedes Lane and Town Center Boulevard.

The proposed project would be designed in conformance with the proposed *El Dorado Hills Town Center East Urban Infill Residential Area Residential Design Guidelines and Development Standards* (EDH Design Guidelines). The guidelines will be used by the County to ensure that the proposed project will conform to the character of the surrounding area. Way-finding, security lighting, and perimeter fencing would be provided in conformance to EDH Design Guidelines and County standards.

3.5 PARKING, CIRCULATION, AND EMERGENCY ACCESS

Two vehicle access points would be provided to enter and exit the parking garage (see **Figure 3.0-7**, Site Plan). The main entrance would be from a piazza on Town Center Boulevard (see **Figure 3.0-16**, Town Center Piazza Rendering), with the secondary access point on Vine Street. These roads connect to major County roads, including White Rock Road to the south and Latrobe Road to the west. The proposed project would not alter vehicular circulation patterns in the project area.

The total garage area would be approximately 122,500 gsf. The parking garage would provide a total of 409 vehicle parking spaces and 22 motorcycle parking spaces for residents and visitors, with an additional five spaces of surface parking provided elsewhere on the project site.

A 25-foot wide EVA that connects Town Center Boulevard to Mercedes Lane is also proposed along the western property line, adjacent to Town Center Lake. Pedestrian paths would be provided on-site that lead to building entrance areas. These paths would also connect to the existing sidewalks along Town Center Boulevard and Vine Street that join the existing pedestrian paths within the TCE area.

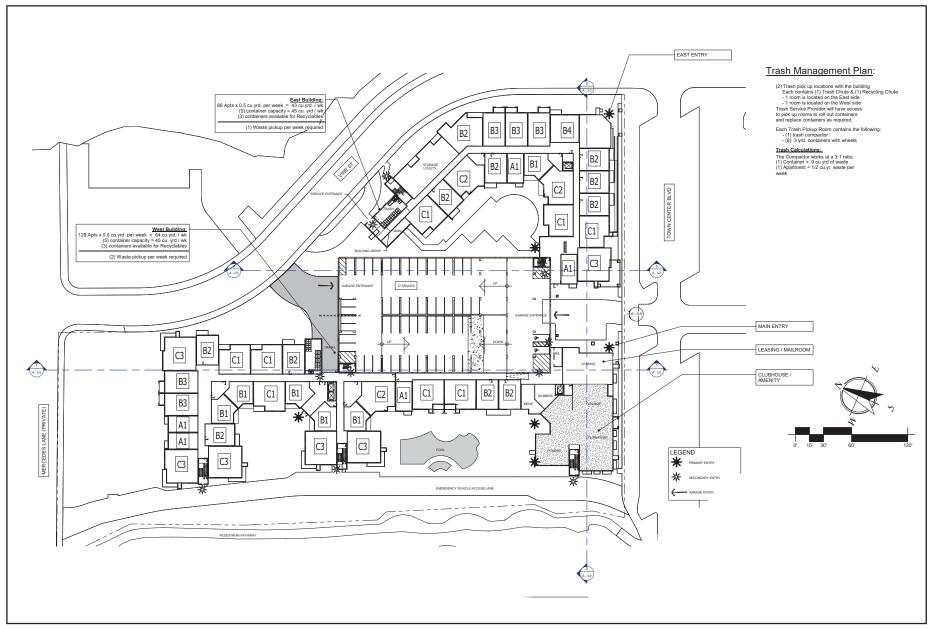


FIGURE 3.0-9

Project Site Plan — First Level



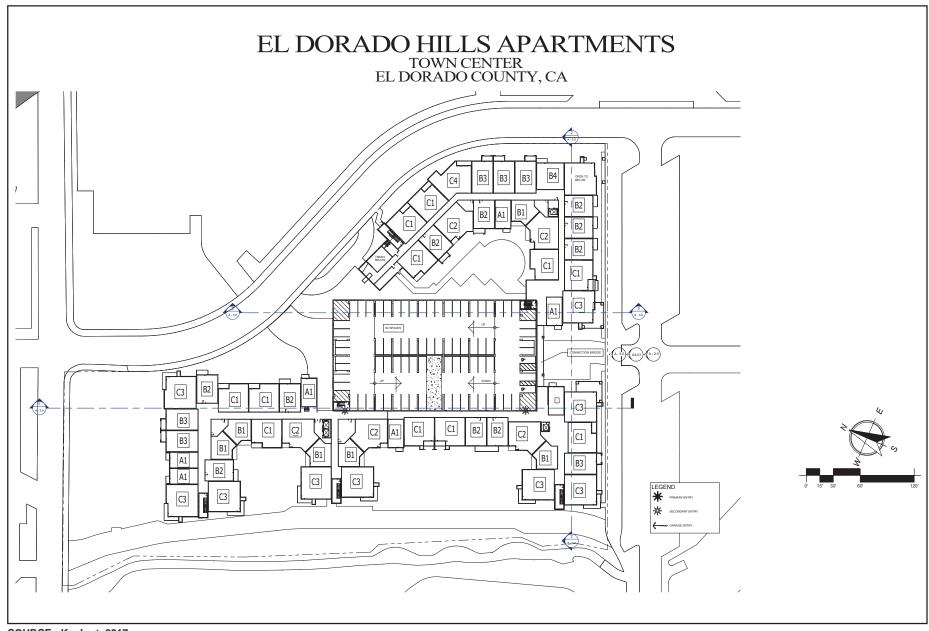


FIGURE **3.0-10**

Project Site Plan — Second Level



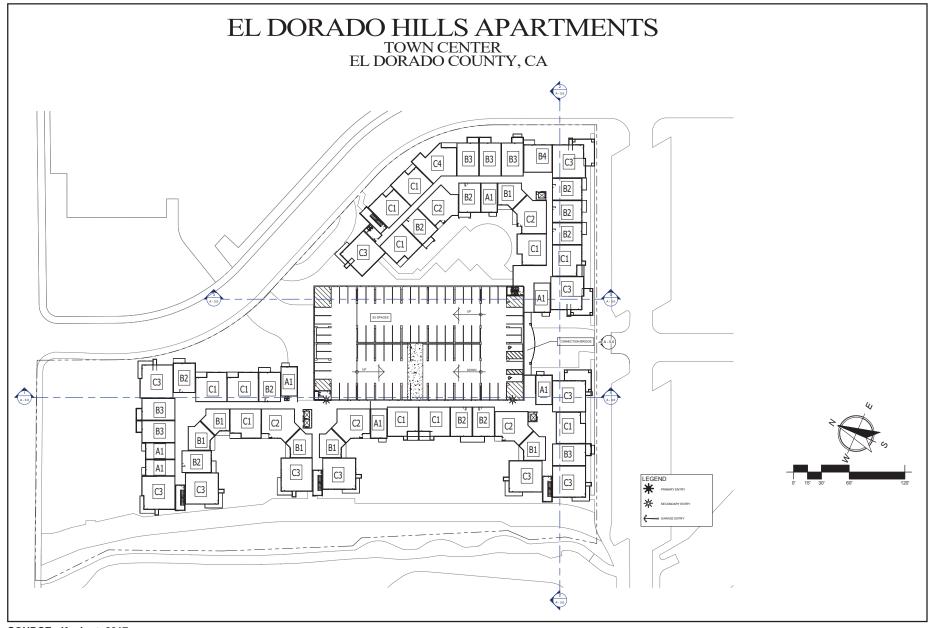


FIGURE 3.0-11

Project Site Plan — Levels 3 and 4

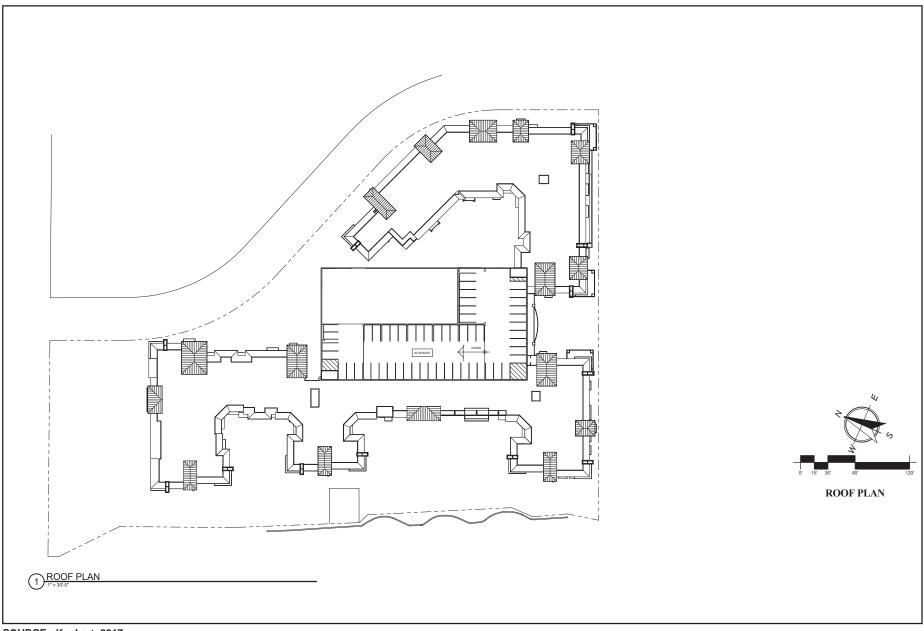


FIGURE **3.0-12**

IMPACT SCIENCES

Roof Plan



IMPACT SCIENCES

Illustrative Project Elevations

FIGURE **3.0-1**3



VINE ST. & MERCEDES



STUCCO A

STUCCO B

STUCCO C

COMPOSITE SHINGLE ROOFIN

1" = 20'-0"

SOURCE: Kephart, 2017

FIGURE 3.0-14

Illustrative Project Elevations







MERCEDES & GREENBELT



SOURCE: Kephart, 2017

IMPACT SCIENCES

FIGURE **3.0-15**

Illustrative Project Elevations



FIGURE **3.0-16**

Town Center Piazza Rendering



3.6 UTILITIES

3.6.1 Potable and Irrigation Water

The El Dorado Irrigation District (EID) is an irrigation special district, organized and existing under the California Irrigation District Law (Water Code Section 20500, et seq.) and authorizing statutes (Water Code Section 22975, et seq.). EID, which serves nearly 110,000 residents in El Dorado County, would supply potable water to the proposed project. As shown in **Figure 3.0-17**, **Preliminary Utility Plan**, the project would extend a line from the 12-inch water main in Vine Street to a 4-inch point of connection near the entry driveway. This water line would provide potable domestic water service to the entire development. A second point of connection would be made from the 12-inch water main in Town Center Boulevard to provide a connection for fire service to the development via a 6-inch service line. A 12-inch service line would be extended between the 12-inch main lines in Town Center Boulevard and Mercedes Lane along the western edge of the project site to allow for the installation of three new fire hydrants; no domestic water service would be provided from this line.

Recycled water would be used for landscape irrigation on the project site. The project would extend the 6-inch recycled water main in Vine Street to a 1-1/2-inch point of connection near the entry driveway. This recycled water line would provide service to the entire development.

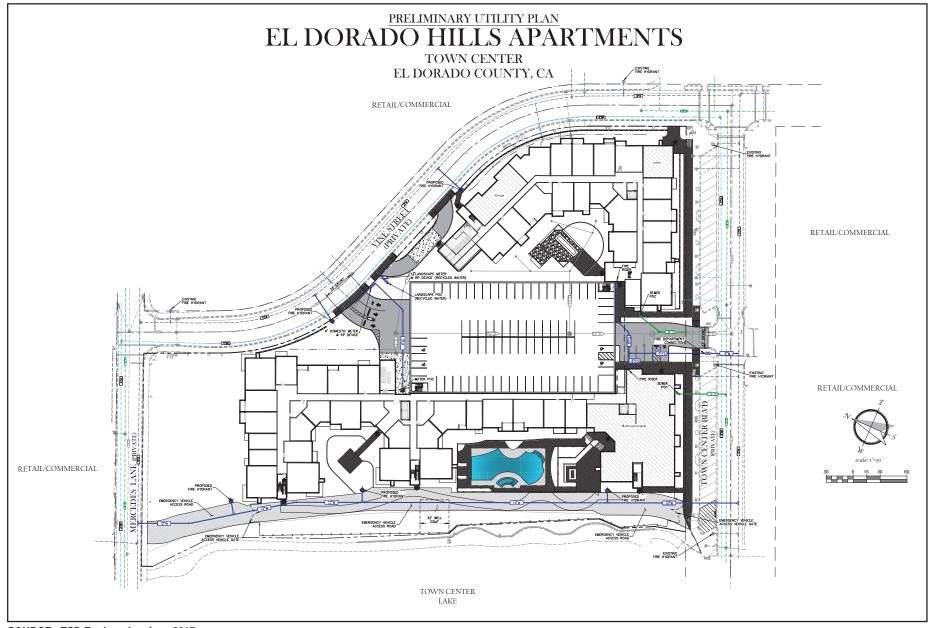
No off-site improvements to the existing water mains or the recycled water main are needed to serve the proposed project.

3.6.2 Wastewater

EID also provides wastewater collection and treatment services to the project area. The project would be served by the El Dorado Hills collection system, which consists of a series of lift stations, force mains, and gravity sewer mains that convey wastewater to the El Dorado Hills Wastewater Treatment Plant (EDHWWTP). As shown in **Figure 3.0-17**, the project would extend two lines from the 8-inch sewer main in Town Center Boulevard to two 6-inch points of connection (one for each building) near the main entry driveway to convey wastewater from the development. The 8-inch sewer main in Town Center Boulevard discharges into the 18-inch mainline El Dorado Hills Boulevard (EDHB) trunk gravity sewer line in the vicinity of White Rock Road and Post Street, sections of which might not have adequate capacity to handle project flows. As a result, off-site improvements to the EDHB trunk gravity sewer line may be required.

3.6.3 Storm Drainage

The site is currently served by private storm drainage facilities. A private entity owns and maintains a 12-inch storm drain in Town Center Boulevard. The proposed project would not alter the drainage system



SOURCE: TSD Engineering, Inc., 2017

FIGURE **3.0-17**

Preliminary Utility Plan



along Town Center Boulevard. Storm water from proposed impervious surfaces on the site would be collected, treated, and discharged to the existing storm drain system. No off-site improvements to the existing storm drains are needed to serve the proposed project.

3.6.4 Electricity and Natural Gas

The Pacific Gas and Electric Company (PG&E) provides electricity and natural gas service to the El Dorado Hills community. PG&E charges connection and user fees for all new development, in addition to sliding rates for electrical and natural gas service based on use.

3.6.5 Sustainable Development Features

The proposed project proposes high-density residential on an infill site in close proximity to commercial development and employment centers. The project proposes to incorporate the following measures to: minimize energy and water consumption; improve indoor environmental quality; minimize waste disposed in landfills; and minimize vehicular traffic and associated air pollutant emissions.

Water

- Reclaimed irrigation water
 - The recycled water main will be extended from a 6-inch line in Vine Street. This recycled water line will provide service to the entire development.
 - Recycled water will be used for irrigation of all landscaped areas.
- New landscape plants will be drought tolerant, native to California or other Mediterranean climates, or other low water use species.
- High efficiency irrigation systems with water-efficient sprinkler heads, and smart controllers that use satellite weather data will be used.
- All water fixtures (faucets, showerheads, and toilets) will be low flow and/or WaterSense certified for low water use.
- All units will be equipped with Energy Star certified dishwashers for low water use.
- High-efficiency hot water boiler systems will be used for efficient hot water distribution.

Energy

- All buildings will exceed Title 24 energy requirements by a minimum of 10 percent.
- All apartments will be equipped with Energy Star certified appliances (dishwashers and refrigerators).

- Energy efficient LED light fixtures will be installed within the apartment buildings and for exterior lighting.
- All residential units will incorporate energy efficient Low-E windows.
- A minimum of 15 percent of the roof areas will be reserved for future photovoltaic (PV) solar installation. Infrastructure (conduit, structural elements, etc.) will be provided to facilitate the future PV solar installation.
- The parking garage will be designed for future Electric Vehicle (EV) charging station expansion.
- Temperature controllers will be installed for pool and spa heaters.

Materials

- More than 55 percent of all demolition materials and construction debris will be recycled.
- Durable, non-combustible materials, and fire resistant roofing will be used.
- Low/no VOC paints and coatings will be used in project construction and maintenance.
- Low VOC caulks, construction adhesives, and sealants will be used in project construction and maintenance.

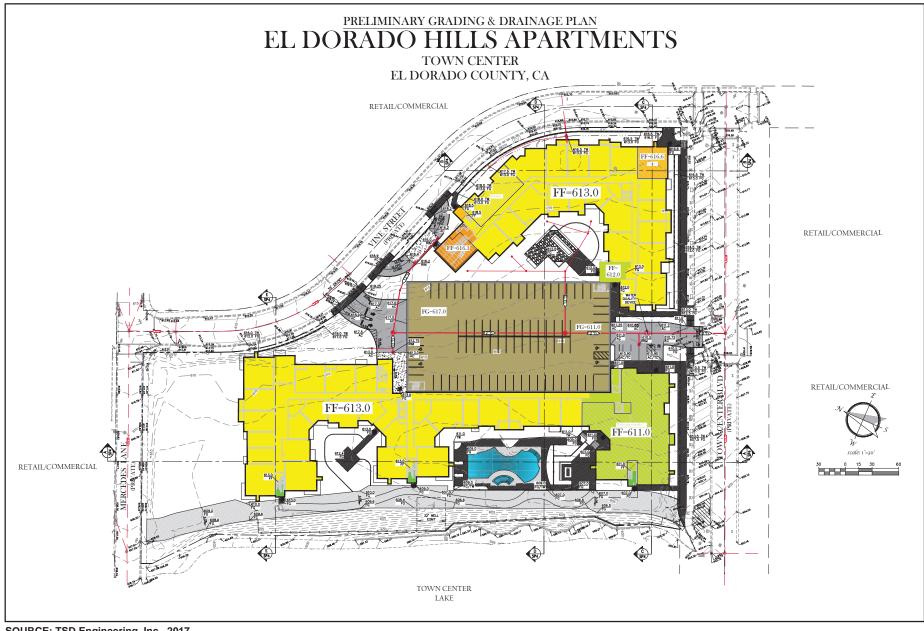
Site Planning & Design

The proposed project will be equipped with secure bike lockers for residents.

3.7 CONSTRUCTION ACTIVITIES AND SCHEDULE

Site clearing would be followed by excavation and grading. Site construction would include finish grading to establish necessary pads and foundations, construction of retaining walls and site encroachment, and installation of underground utility lines (i.e., water, recycled water, sewer, storm-drainage, and fire hydrants). Subsequent phases will include building construction, completion of exterior and interior improvements, and installation of landscaping. The project has been designed to balance earthwork on the site between cut and fill (see **Figure 3.0-18**, **Preliminary Grading and Drainage Plan**). However, during excavation of the building footings, plumbing, etc., some incidental excavated material will need to be hauled off site.

It is anticipated that the County Board of Supervisors would consider the Draft EIR for certification in fall 2017. If the proposed project were approved, project construction would occur over a period of 15 to 16 months. Construction would begin in spring 2018, with site grading and utility infrastructure work completed by late summer 2018. Construction of residential units is expected to commence in fall 2018 with completion by summer 2019, with full occupancy of the units shortly after that.



SOURCE: TSD Engineering, Inc., 2017

FIGURE **3.0-18**

Preliminary Grading and Drainage Plan



3.8 PROJECT APPROVALS

The project site is currently designated General Commercial-Planned Development (CG-PD) in the El Dorado Hills Specific Plan. As the proposed project would develop housing on the project site and would have a density of approximately 47 du/ac, the Spanos Corporation has applied to the County for the following four entitlements for the proposed project:

- 1) General Plan Amendment adding a new Policy (Policy 2.2.6.6) under Objective 2.2.6 (Site Specific Policy Section) to increase the maximum residential density allowed in the General Plan from 24 dwelling units per acre to a maximum of 47 dwelling units per acre specifically for the 4.565-acre project site within the TCE Planned Development area identified as Assessor's Parcel Numbers 121-290-60, 61, and 62.
- 2) El Dorado Hills Specific Plan Amendment incorporating multi-family residential use, density, and related standards for the project site. The project site would be designated as "Urban Infill Residential" within the Village T area of the El Dorado Hills Specific Plan (see **Figure 3.0-5**, Existing and Proposed Specific Plan Designations).
- 3) Rezoning of the project site from General Commercial-Planned Development (CG-PD) to Multi-Family Residential-Planned Development (RM-PD) and revisions to the RM-zone district development standards applicable to the proposed 214-unit apartment project (see **Figure 3.0-6**, Existing and Proposed Zoning).
- 4) Revision to the approved TCE Development Plan incorporating multi-family residential use, density, and related design and development standards for the proposed 214-unit apartment project within Planning Area 2 of the TCE Plan area (see **Figure 3.0-4**).

3.9 LEAD AND RESPONSIBLE AGENCIES

The County of El Dorado has the principal responsibility for approving the proposed project. For this reason, the County is the "Lead Agency" as defined by CEQA and is responsible for preparation of this EIR.

As defined by CEQA, "Responsible Agencies" are public agencies other than the Lead Agency that have discretionary approval over the project. The Draft EIR prepared for the proposed project would serve as the primary source of environmental information for each responsible agency. The following agencies are considered responsible agencies for the proposed project.

California Department of Transportation (Caltrans). Caltrans is a California government department that manages the state highway system and is actively involved with public transportation systems within the state. The project site is located approximately 500 feet south of U.S. 50. Although no permits or approvals are needed from Caltrans for the construction and operation of the proposed project, it is anticipated that Caltrans will review the Draft EIR and potentially provide comments to the County for consideration in the preparation of the Final EIR.

Regional Water Quality Control Board (RWQCB). The RWQCB is a state agency responsible for the implementation of programs for the protection of the waters of the state. Although no discretionary permits² are needed from the RWQCB for the construction and operation of the proposed project, it is anticipated that the RWQCB will review the Draft EIR and potentially provide comments to the County for consideration in the preparation of the Final EIR.

The El Dorado County Air Quality Management District (EDCAQMD). The EDCAQMD is responsible for monitoring ambient air pollutant levels throughout the west slope portion of El Dorado County and developing and implementing attainment strategies to ensure that future air quality will be within federal and state standards. Although no permits are needed from EDCAQMD for the construction and operation of the proposed project, it is anticipated that EDCAQMD will review the Draft EIR and potentially provide comments to the County for consideration in the preparation of the Final EIR.

El Dorado Irrigation District (EID). The EID is an irrigation special district, organized and existing under the California Irrigation District Law (Water Code Section 20500, et seq.) and authorizing statutes (Water Code Section 22975, et seq.). The EID oversees potable and recycled water supplies, as well as wastewater conveyance and management within the County. Although no permits or approvals are needed from EID for the construction and operation of the proposed project, it is anticipated that EID will review the Draft EIR and potentially provide comments to the County for consideration in the preparation of the Final EIR.

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The applicant will need to submit a Notice of Intent for coverage under the State National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Stormwater Runoff Associated with Construction Activity (General Construction Permit). This is a ministerial approval.