

March 26, 2007

Mr. Ben Ritchie
City of Rancho Cordova Planning Department
2729 Prospect Park Drive
Rancho Cordova CA 95670

RE: Sphere of Influence (SOI) Annexation and Rezoning
SMAQMD # sac200701101

Dear Mr. Ritchie:

Thank you for the opportunity to comment on the Notice of intent to adopt an Initial Study/Negative Declaration for the *Sphere of Influence Annexation and Pre-zoning* (SOI). Staff comments are as follows:

The SOI states that the project does not conflict with or obstruct implementation of the *Sacramento Regional Non-attainment Area 8-Hour Ozone Rate of Progress Plan* (Ozone Plan). The document supports this statement by making the finding that this potential impact is "less than significant" and was "reviewed under a previous document", specifically the Final Environmental Impact Report for the Rancho Cordova General Plan (GP-FEIR). Section 3.0-8a (Environmental Setting and Impacts-Air Quality) of the SOI makes the following finding:

"According to the GP-FEIR, projected buildout of the General Plan Planning Area would be consistent with assumptions used during the preparation of the Ozone Plan (GP FEIR, pp. 4.0-6)."

This finding is based on section 4.0-6 of the GP-FEIR, which states:

"The Sacramento Region Blueprint was intended to provide for reduced air quality impacts by compact development that reduces vehicle miles traveled..."

"SACOG's Blueprint has projected population of 329,110, 143,091 housing units, and 235,913 jobs for the area by the year 2050 for the General Plan Planning Area."

"The proposed Rancho Cordova General Plan projects a total buildout population of 310,568, 126,241 housing units and 195,021 jobs."

The District is concerned that the projected buildout for the area covered by the SOI is not, in actuality, consistent with the assumptions used in the preparation of the Ozone Plan. The Ozone plan is based on the land use assumptions from the SACOG Regional Blueprint, preferred scenario (Blueprint). The GP-FEIR indicates that General Plan planning area (which includes the area covered in the SOI) will have 18,542 fewer

people, 19,520 fewer housing units, and 40,892 fewer jobs than anticipated by the Blueprint. The District is concerned that this general reduction in density may negate the reduction in vehicle miles traveled (VMT) associated with the more compact development pattern envisioned in the Blueprint. The loss of the anticipated reduction in VMT will mean a greater impact on regional Air Quality through an increase in vehicle emissions. While this increase in emissions may seem counterintuitive due to the reduction in population proposed by the projected buildout, the Blueprint is a zero-sum plan. If the population, housing, and job growth anticipated by the Blueprint are not achieved in the area anticipated, they must be accommodated in another area within the region. This deviation from the Blueprint may dissipate the air quality benefits associated with comprehensive regional planning.

The district encourages the City of Rancho Cordova to re-evaluate the current projected buildout with the goal of better mitigating the discrepancy between the proposed General Plan build-out projections for the area encompassed by the SOI and those used in SACOG's Preferred Blueprint Scenario. Further, the District recommends that city enact a mechanism to allow project proponents the flexibility to "upzone" or increase the density of individual projects when appropriate within the area covered by the SOI.

Thank you for your consideration of these comments. If you have any questions, please contact me at (916) 874-2694 or jhurley@airquality.org.

Sincerely,

Joseph J. Hurley
Assistant Air Quality Analyst

c: Larry Robinson, Sacramento Metropolitan AQMD

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