

January 31, 2011

Supervisor Roberta MacGlashan, Chair
Sacramento County Board of Supervisors
700 H Street, Suite 2450
Sacramento, CA 95814

**SUBJECT: Design, Community & Environment Proposed Evaluation Criteria for the Sacramento County General Plan Update 2030
SMAQMD#: SAC200701173**

Dear Ms. MacGlashan:

Thank you for considering the Sacramento Metropolitan Air Quality Management District (District) comments on the Design, Community & Environment (DCE) proposed evaluation criteria for the Sacramento County General Plan Update 2030 (Update). We have met with County staff on several occasions in an attempt to ensure that the final Update fully supports the 2009 Sacramento Metropolitan Area 8-hour Ozone Attainment Plan (State Implementation Plan or SIP). Overall, we are in favor of the changes outlined by the DCE recommendations to County staff as they will move the General Plan in a more air quality and smart growth-oriented direction. We have provided comments to staff via email and would like to formalize those for your Board here.

In general, the focus of the proposed Evaluation Criteria on specific requirements to be fulfilled for larger new growth projects to move forward is an air quality-friendly change for the General Plan Update, especially in light of concerns over growth projections. Criteria for new development, including a minimum 9 dwelling unit per gross acre density; 15% of residential being required to be vertical mixed use; and the requirement for 37% of residential units being multi-family are all examples of approaches that will reduce vehicle miles travelled (VMT) and, thus, reduce emissions.

Regarding the Community Benefit criterion, the District's preference would be to eliminate it. However, if that is not feasible our strong recommendation is that this requirement not be used in lieu of, or to "trump", other criteria - and therefore undermine the very foundation under which this criteria are based. If this criterion remains, we suggest the following language be added: "Provision of clear community benefit ***that cannot be feasibly accommodated within the current UPA.***"

Additionally, the decision to drop new growth area and future study area maps from the General Plan is a good one and, we believe, will help to eliminate ambiguity and confusion as these criteria are put into effect. Also, we appreciate the staff recommendation to require ALL projects coming forward to adhere to these criteria and not allowing any projects without entitlements to be grandfathered in under the prior General Plan.

In discussions with County staff we were pleased to learn that the SIP will be added to the list of documents with which a project must be "compatible"; along with Blueprint, the MTP and the Regional Transit Master Plan. We also recommend that the SB375 Sustainable Communities Strategies (SCS) should also be included here. As well, County staff indicated they will be working to draft new development metrics that are GHG-based – the SMAQMD staff stands ready to assist.

My staff and I are encouraged by the changes being proposed by County staff in collaboration with DCE. We want to continue to be part of the discussions and to offer our assistance in all efforts to get the General Plan Update approved in the next several months.

Please contact me or Larry Robinson 916/874-4816 or my staff if we can answer any questions about these comments or be of any help.

Regards,

Larry Greene
Executive Director/Air Pollution Control Officer

c: Leighann Moffitt, Sacramento County
Dave Defanti, Sacramento County
Larry Robinson, Sacramento Metropolitan AQMD
Charlene McGhee, Sacramento Metropolitan AQMD
Rachel Dubose, Sacramento Metropolitan AQMD