

August 14, 2008

Mr. Peter Brundage
Executive Officer
Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

RE: City of Elk Grove Sphere of Influence Amendment Request (LAFC 04-08)

Dear Mr. Brundage:

The Sacramento Metropolitan Air Quality Management District (District) appreciates the opportunity to provide the following comments on the City of Elk Grove Sphere of Influence Amendment (SOIA).

The District's current 1-hour State Implementation Plan (SIP) assumes no growth will occur outside the Sacramento County Urban Services Boundary (USB). Based upon maps provided in the proposal, over half of the proposed area is outside the existing USB and the air quality impact of this growth was not considered in the SIP.

All analyses for the upcoming 8-hour SIP are based on the land use and transportation projections contained in the recently adopted 2035 Metropolitan Transportation Plan. The 2035 MTP assumed all growth for that time horizon could be accommodated within existing Elk Grove boundaries. As a result, the emissions associated with the growth area being proposed have not been considered in the MTP or SIP environmental documents.

Expansion of the urbanized area in Sacramento has the great potential to make more difficult the already challenging task we all face in meeting the AB32 goal of reducing carbon emissions statewide by approximately 25% by 2020. Timing of new development, maintaining a good jobs/housing balance and linking development patterns to the transportation network (especially transit) all will have a strong influence on the region's greenhouse gas footprint.

Should the Commission approve the proposal before them, I urge them to consider an operational performance standard of 35% (requiring a 35% reduction in operational emissions for all projects within the approved SOIA area). Though it is comparable to mitigation required in the other growth areas in Sacramento County, namely North Natomas and the already approved Folsom SOIA, a 35% performance standard will not fully mitigate and will only partially offset the significant adverse impacts.

Thank you for your consideration of these matters and how air quality in our region may be affected. Please contact me if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Greene". The signature is fluid and cursive, with a long horizontal stroke at the end.

Larry Greene
Executive Director/Air Pollution Control Officer

c: Gary Davis, SMAQMD Board of Directors
Don Nottoli, SMAQMD Board of Directors
Mike McKeever, SACOG Executive Director