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June 25<sup>th</sup>, 2018

Scott A. Johnson, AICP  
Planning Manager  
City of Folsom Community Development Department  
50 Natoma Street  
Folsom, CA 95630  
e. [generalplan@folsom.ca.us](mailto:generalplan@folsom.ca.us)

**RE: Folsom General Plan Update and the prospect of Future Folsom Expansion**

Dear Mr. Johnson,

The Environmental Council of Sacramento (ECOS), a 501c3 organization, and Habitat 2020, the Conservation Committee of ECOS, are partner coalitions dedicated to protecting the natural resources and communities of the greater Sacramento region. ECOS-Habitat 2020 member organizations include: 350 Sacramento, Breathe California of Sacramento-Emigrant Trails, International Dark-Sky Association, Los Rios College Federation of Teachers, Mutual Housing California, Physicians for Social Responsibility Sacramento Chapter, Preservation Sacramento, Resources for Independent Living, Sacramento Housing Alliance, Sacramento Natural Foods Co-op, Sacramento Vegetarian Society, SEIU Local 1000, Sierra Club Sacramento Group, The Green Democratic Club of Sacramento, and the Wellstone Progressive Democrats of Sacramento, Sacramento Audubon Society, California Native Plant Society, Friends of the Swainson's Hawk, Save the American River Association, Save Our Sandhill Cranes, Sierra Club Sacramento Group, Friends of Stone Lakes National Wildlife Refuge, and the Sacramento Area Creeks Council.

**ECOS and Habitat 2020 are greatly relieved to see that the Study Area for new City growth south of Whiterock road has been removed from the General plan.**

Further growth in this area would pose potentially un-mitigatable impacts to invaluable agricultural and biological resources and severely inhibit successful implementation of the South Sacramento Habitat Conservation Plan (SSHCP), currently in its final phase of adoption after decades of development.

Further growth in this area would be critically inconsistent with the Sacramento Area Council of Governments' (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) for meeting State mandated greenhouse gas (GHG) reductions, Federal mandates for Air Quality Attainment under the State Improvement Plan (SIP), as well as myriad regional goals for social equity, public health and natural resource conservation.

Finally, ECOS is extremely concerned about the ability of the City to supply adequate water supplies to this potential growth area, or any new expansion area. With the decision to supply the City's current expansion south of US 50 solely with conservation efforts of existing supplies, it is apparent that the City has fully allocated those supplies. We remain concerned that the City will not be able to supply the *current* expansion area without severe burdens on existing residents with the mandatory cut-backs in supply that the City is subject to in Dry and Extremely Dry years. We have not seen evidence that the City has yet acquired back up supplies to prevent these burdens, and given this, it is extremely difficult to see how the City could speculate on further expansion of their footprint.

Again we are happy that the City has decided to officially remove the Study Area for new growth south of Whiterock from the current Update. However, as the City has obviously been speculating on this new growth, ECOS recommends that the City adopt the following three new policies to responsibly plan for any future expansion of the City:

1. No application for a Sphere of Influence expansion will be sought until such time that the necessary acquisitions to meet the conservation targets of the SSHCP for the sector in question are executed .
2. No application for a Sphere of Influence expansion will be sought until such time that the area in question is identified by SACOG as a potential growth area that would be consistent with the MTP/SCS in meeting mandated regional GHG reductions and Air Quality Attainment.
3. No application for a Sphere of Influence expansion will be sought until such time that an adequate water supply for the given area is demonstrable and *fully executed* under law.

Thank you for your consideration and the opportunity to comment.

Sincerely,



Ralph Propper  
ECOS Board President



Rob Burness  
Co-Chair, Habitat 2020



Sean Wirth  
Co-Chair, Habitat 2020