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September 26<sup>th</sup>, 2018

City of Elk Grove  
Attn: Christopher Jordan, AICP, Director of Strategic Planning and Innovation  
8401 Laguna Palms Way  
Elk Grove, CA 95758  
email: [cjordan@elkgrovecity.org](mailto:cjordan@elkgrovecity.org)

**RE: Elk Grove General Plan Update and DEIR, and the prospect of future expansion**

Dear Mr. Jordan,

This letter provides comment from the Environmental Council of Sacramento (ECOS) and Habitat 2020 regarding the City of Elk Grove's General Plan update and corresponding Draft Environmental Impact Report (DEIR).

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.

**Summary**

Following ECOS and Habitat 2020s' opposition to the recently adopted Kamerrer-99 Sphere of Influence Expansion, ECOS and Habitat 2020 are primarily concerned with the "study areas" for further expansion proposed in this General Plan Update. Elk Grove's anticipated growth can be accommodated within the existing City limits, and we find no justification for expansion beyond the Sacramento County Urban Services Boundary (USB) established in 1993 to be the ultimate growth boundary within the County. The

proposal is 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. There is an extreme lack of certainty that municipal water can be provided to this area without severe regional impacts, and the impacts to invaluable agricultural and biological resources by the proposal are potentially impossible to mitigate.

The justification given for study of further expansion is the need for Elk Grove to correct its job's housing balance. This is a goal that ECOS agrees with, but, again, the housing and employment that Elk Grove anticipates achieving from existing planning areas within the current City boundaries already far exceed that of SACOG'S projections for Elk Grove by 2040. If Elk Grove were to achieve these housing and employment projections in the SOIA as well, it would certainly have impacts on housing and employment in neighboring jurisdictions in the region.

While these proposed expansion areas are only "study areas," it is irresponsible of the City to signal intent for growth that is so divergent from the regional plan, and where the cumulative impacts to the region would be so great.

### **Land Use, Transportation, Air Quality, and Climate Change**

The proposed study areas for further expansion are inconsistent with SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy, and in direct opposition to the intent of the State, Federal and regional goals that are represented in that collaboratively designed regional plan. The MTP/SCS represents the best regionally-cumulative analysis available in providing the most viable strategy for allocating urban growth and transportation infrastructure needs across our 28 jurisdictions while meeting State mandated greenhouse gas (GHG) reductions, and Federal mandates for Air Quality Attainment under the State Improvement Plan (SIP).

The joint MTP/SCS is the mandated product of the Sustainable Communities and Climate Protection Act of 2008 (CA SB 375), which mandates that a land use strategy be developed in tandem with the federally required regional transportation plan in an effort to reduce GHG emission from the light vehicle sector. These GHG reductions found through the nexus of land use and transportation are largely represented by reductions in Vehicle Miles Travelled (VMT), by reducing travel distance between jobs, housing and services through more compact development and increased investment and access to non-automobile modes of travel. More compact land use and increased options for traveling (through transit, walking and biking) simultaneously offer significant benefits to public health and social equitable housing, and preserves our natural and working lands, as well as associated biodiversity and ecosystem services such as carbon sequestration, flood abatement, and groundwater recharge.

Considering all of the benefits the MTP/SCS strategy provides, deviation from the plan cannot be taken lightly. Both the State mandated GHG reduction targets and the federal air quality attainment requirements were extremely difficult for SACOG to achieve in the recent 2016 MTP/SCS update *and these reduction targets were strengthened in 2018*. SACOG's projected growth footprint will in turn be even more compact in 2020. Any deviation from the plan, particularly in urban expansion outside of the SCS footprint, would pose a significant challenge for any future ability of the region to achieve these requirements—the consequences of which would include loss or withdrawal of substantial Federal and State infrastructure funding.

Considering that there is no wiggle room in the current strategy, the only way the MTP/SCS could accommodate expansion of Elk Grove (or any jurisdiction) beyond the SCS footprint and still meet State and Federal requirements would be to take growth away from all the other jurisdictions in the region.

The California Air Resources Board (CARB) has finalized the GHG Scoping Plan Update in 2018, finding that GHG reductions from other sectors including energy production, energy efficiency, clean fuels, and clean vehicles will not achieve California's 2050 goals alone--that we need 15% more VMT reduction through improved land use and transportation strategies *beyond* what our current regional plans project to achieve.

The region needs to reduce VMT significantly. The primary mechanism by which to do this is to reduce outward urban expansion and increase densities within existing urbanized areas.

SACOG growth projections for Elk Grove (in total) for the next 20 years is 12,790 houses, and 14,760 jobs (SACOG 2020 MTP/SCS Draft Growth Forecast, June 8, 2018 Staff Report). All of SACOG's anticipated housing growth can easily be accommodated within vacant land of existing communities and new developments already being planned in new development areas of the existing City, including Laguna Ridge, Lent Ranch, and the Southeast Planning Area (SEPA).

Elk Grove has repeatedly made the claim that it must expand to focus on job centers that will correct its greatly imbalanced jobs-housing ratio. This is a worthy goal, but again, this can be done within the existing City limits. The Southeast planning area alone, by Elk Grove's projection, will accommodate more than 20,000 jobs far more than what SACOG projects as feasible in the next 20+ years.

We believe that the job growth aspirations of the City are unrealistic, and that, as has been observed time and again in Elk Grove, this land will end up being low-density housing with little nearby job opportunity. But if we were to presume that Elk Grove did attract this extreme number of jobs, a significant amount of them would almost necessarily be drawn from other jurisdictions in the region—what would be the cumulative economic effect of that potentiality?

Looking at this potential growth through a regional lens should be the foremost priority for Elk Grove and all jurisdictions in the region. If the peripheral expansion that Elk Grove seeks were to proceed, it would make it almost impossible for the region to achieve our State VMT/GHG reductions and Federal air quality mandates.

Elk Grove's jobs-housing imbalance is a correctable problem of the City's own making, and it can and should be corrected within the existing footprint (and the regional plan) before expansion is considered at the expense of the region and the Public Trust.

## **Hydrology and Water Quality**

The document proposes to remove agricultural lands in the form of several Study areas; annex these Study areas from the County to the City of Elk Grove; and develop them into a mixture of uses with residential being the primary use. The City is unable to certify that water supplies can be provided for the Study areas. In addition, the Study areas appear to border the riparian habitat areas and water course of the Cosumnes River and its associated streams and creeks. As such a general case can be made that the lands in question are better served if they remain designated as agricultural and, as such continue to recharge the Sacramento Central Basin. The Cosumnes River basin is a GDE and groundwater levels below it do not adequately support the river or its immediate habitat. Additionally, as excess storm water from the American River network becomes available for recharge, one or more of the study areas may be candidate recharge areas.

Section 5.9, page 5.9.18 references California's Sustainable Groundwater Management Act (SGMA) and documents prepared by the Sacramento Central Groundwater Authority. However, the document does not refer to the importance of the Cosumnes River basin as a series of Groundwater Dependent Ecosystems (GDE or ecological communities of dependent species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface). The Cosumnes River has been disconnected from its underlying aquifer by years of groundwater pumping and diversion. This groundwater level disconnection is well-understood and includes impacts on the timing of the re-connection of flows of the Cosumnes River, which affects salmon migration; impacts on other important groundwater dependent ecosystems such as riparian forests and the species that depend on them; and, impacts on a wide range of other beneficial uses.

SCMA refers to the need for Management Areas where GDEs are present and are negatively impacted because of the lack of surface water that is normally connected to a continuous saturated zone of the underlying aquifer. This project will require additional groundwater extraction. Further demand for groundwater in the Southwestern and Southern portions of the Sacramento Central Groundwater Basin, as well as, along the River's water course, will exacerbate this problem and potentially negate current in lieu and groundwater recharge projects being implemented to partially address it.

Section 5.9, page 5-9-18 makes selective use of some of the Sacramento Central Groundwater Authority (SCGA) information contained in its 'Alternative Plan' and

Annual Report to present a positive picture regarding the status of Central Sub Basin and its ability to provide groundwater supplies for the City's potential project. While the basin's storage has increased in aggregate since 2005 it is important to note that there have been several years of negative storage. For example, during 2014 the storage level was 110,000-acre feet below the 2005 storage level.

The basin is susceptible to the impacts of climate change. Climate scientists project an increase in both the frequency and severity of droughts in our region. The potential impacts on aquifer recharge and the availability of groundwater to meet future demands under these conditions are not yet known.

The ability of the Cosumnes river basin to effectively recharge to provide the needed connection between the aquifer and the river's surface water, as well as maintain the groundwater at levels sufficient to provide for the riparian habitats within the GDE has not been demonstrated by SCGA. Recent spring monitoring data does show that after two wet years the Cosumnes River has seen some recharge and that spring well levels have improved over levels seen in 2005 and during the drought. However, aquifer water levels are still well below the tree root zones of the riparian forests for most of the 24 miles of river course through the Sacramento Central Groundwater Basin. Without additional recharge efforts it is highly uncertain that the Cosumnes River basin and its GDE will be recovered. Additional groundwater extraction to supply water for the City's project could exacerbate the basin's long-term health.

The EIR also makes assertions that the development of the study areas may actually increase the amount of recharge that occurs. This statement is unsupported. Recent studies indicate typical undeveloped or fallow fields in the region can recharge up to 3-acre feet, per acre, per year. It is hard to believe that a residential development with all its hardscape will provide the same recharge potential even if storm water is treated and becomes part of the in-lieu recharge program. Also, unless the recharge occurs in the same riparian areas that will be impacted by the loss of natural recharge, the benefits may not be equivalent.

Impact 5.9.4 states that the City's proposed project increases demand for water supplies, some of which would be provided from groundwater sources. This impact is described as 'Potentially Significant'. The EIR goes on to state the project could contribute to conditions affecting aquifer volume or groundwater levels, and that the City has no authority to effectuate additional supplies. The EIR states that Sacramento County Water Agency cannot consistently provide sufficient water supplies in 2020 and 2025 in all conditions.

This finding is understated. It is unconscionable to propose a new growth area when the water supply purveyor asserts that it cannot provide adequate supplies in drought conditions. The City knows full well that this Region experiences periodic droughts, and that climate scientists are projecting more significant and frequent droughts for the State in the years to come.

Impact 5.9.7 states the project areas, in combination with other development in the Central Basin would increase groundwater demand and potentially interfere with the recharge of the aquifer. This impact is described as 'Potentially Cumulatively Considerable'. The document goes on to state that there is no mitigation possible by the City.

Again, this finding is understated for the same reasons discussed in response to 5.9.4. The Project should be rejected on the basis of insufficient water supply; the impacts it would have on the region's water supplies; and the impacts it would have on the Cosumnes River and its water course.

## **Biological Resources**

### **The impact of increased land values on the SSHCP and other conservation efforts was not analyzed**

The inclusion of the West and South Study Areas in the General Plan Update inflates land prices in those areas significantly above what typical values would be for agricultural lands in the region. This price inflation directly affects the ability of the SSHCP or any other conservation effort to purchase those lands. This is an environmental impact and it was not discussed and analyzed

### **The importance of the Environmental Setting for the Study Area was not fully explicated**

The proximity of the Cosumnes River Preserve to the south and Stone Lakes National Wildlife refuge to the west confers to the Study Areas added biological significance as a foraging area for many species that roost or nest in those preserved landscapes. What the DEIR lacks is a description that attempts to encompass the significant geographical and biological relationship between the Study Areas and the lands of the Stone Lakes National Wildlife Refuge (SLNWR) and the Cosumnes River Preserve (CRP). In this context, the Study Areas represent extremely important foraging areas and wildlife movement corridors for species from both SLNWR and CRP. As well, the Study Areas act as very important buffers to absorb direct and indirect impacts from urban activities. The removal of any part of this important foraging, wildlife movement, and buffering area will have demonstrable impacts on both SLNWR and CRP. These are not analyzed or considered. The important species survey data collected in both of these important protected areas does not even seem to have been utilized to determine the presence of listed species in the Study Areas either.

Add to this the fact that the Cosumnes River is the last remaining free flowing river out of the West side of the Sierra Nevada Mountains and that CRP and SLNWR are active floodplains that inundate cyclically every seven to ten years. Since much of the conservation in this area is within an active floodplain, upland foraging lands become critical. The West and South Study Areas are such upland foraging areas and as such are

extremely important during the cyclical inundations mentioned. This was not analyzed or even mentioned.

And further, given the relative elevations of the Cosumnes River Preserve, Stone Lakes National Wildlife Refuge, and the Study Areas, even further significance is conferred because beyond the cyclical flooding that is inherent in the Cosumnes River Preserve, there is the prospect of habitat loss to the entire of the north Delta due to global climate change and sea level rise – both topics covered in more detail elsewhere in this comment letter.

### **Cyclical Flooding and Sea Level Rise Are Major Gaps in the Biological Resource Analysis**

The biological resource analysis fails to consider cyclical flooding of the lower Cosumnes River Basin, the impact of sea level rise on the north Delta, and the effect of both on the Greater Sandhill Crane and the lesser sandhill crane, as well as all other species who share same habitats. Together they comprise a major gap in the analysis.

The Study Areas lay just north of the Cosumnes River flood plain, which is active and is inundated periodically. The Cosumnes River is the only undammed river flowing out of the west side of the Sierra Nevada Mountains, and due to past levee breaches, intentional and unintentional, the river actively floods the lower Cosumnes River basin on a cyclical basis. Severe flooding has occurred on average every seven to ten years. Recent significant flood events have occurred in 1997, 2005-2006, and 2015-2016. Similarly, Stone Lakes National Wildlife Refuge, both in the actual Refuge and within the legislative boundaries of the Refuge, has many low elevation areas that are also subject to flooding.

Historically, the Study Areas area have provided critical upland foraging habitat for the Greater Sandhill Crane during the frequent flood events in the lower Cosumnes basin. Dr. John Trochet worked for the Nature Conservancy and Gary Ivey in 2005 between January and March and documented Greater Sandhill Crane usage of agricultural lands either in the immediate vicinity of the SOIA area during a flood event (Ivey, “Mitigating Loss of Sandhill Crane Habitat in South Sacramento County, March 25, 2005). Though it has been acknowledged that significant portions of the lands in and around the Stone Lakes National Wildlife Refuge that were added to the “inventory” of the SSHCP are at or below sea level, no investigation or scientific determination has been made as to the impact of the removal of upland foraging habitat for the Greater Sandhill Crane, given its importance during flood episodes. Most of the preservation of sandhill crane habitat has been within the floodplain, and significant areas that are not technically within the floodplain, such as Staten Island, are at risk of catastrophic failure during significant flood events if their antiquated levees fail – this nearly happened to the Staten Island levees during the 2005-6 flood event and it was only emergency repairs that kept it from becoming a lake. A significant flood episode with inadequate upland foraging habitat remaining could have catastrophic consequences for the Greater Sandhill Crane.

Similarly, other listed and species of concern would also be impacted. This was not discussed or analyzed in the DEIR.

Beyond the cyclical flooding, global climate change and the resultant rise in sea level poses additional risks to low lying areas in the lower Cosumnes basin, Stone Lakes National Wildlife Refuge, and the entirety of the Delta. Dr. Rod Kelsey at the Nature Conservancy has done some preliminary modeling in the north Delta as part of TNC's participation in the Crane Technical Advisory Committee (a committee, formed in 2015 which includes representatives from CDFW, USFWS, DWR and the Nature Conservancy, as well as preserve managers, scientists and environmentalists, that is working on a sandhill crane conservation strategy for California) and as an exercise to refine TNC's own land acquisition priorities for sandhill crane conservation. The modeling exercise looked at conservative sea level rise predictions for between now and 2100 for the Delta and surrounding landscapes. The initial draft maps that resulted from this exercise are attached. The maps are undergoing refinement to also consider relative crane abundance, but these draft maps are still useful in demonstrating the concerns about sea level rise and the potential threats to sandhill cranes, as well as all of the other terrestrial wildlife that reside in or near the north Delta.

The first map (figure 1) depicts current high value crane habitat based on suitable ground cover-type and distance from established roost sites (within a 2-mile diameter of established site). This draft map has yet to be adjusted for relative abundance of cranes, which would increase the priority of available habitat close to roost sites with greater numbers of cranes. The second map (figure 2) depicts the areas that are at risk of permanent inundation based on conservative sea level rise predictions, relative existing elevations, and potential for levee failure. Virtually all of the lands currently conserved for Greater Sandhill Cranes are at risk of being lost. This realization has resulted in the need to rethink long term conservation strategies for sandhill cranes in the Delta and its surrounding landscapes, not to mention all of the other listed and special concern species that share the same landscapes. The third map (figure 3) attempts to depict how conservation priorities need to shift to address the threat of sea level rise. It attempts to balance the importance of habitat near historic roost sites with the need to shift populations to the east where there is higher elevation and thus more sustainable long-term habitats.

The West and South study Areas fall squarely within the highest priority long term areas for conservation due to its proximity to existing roost sites, its relative higher elevation, and its critical position as a bridge to the east for both Stone Lakes National Wildlife Refuge and Consumnes River basin crane populations. The loss of the West and South Study Area were not analyzed looking at the effects of climate change on sea level rise and the resultant loss of lower elevation habitat. Because of both the increased importance for foraging during cyclical flood events and the long-term importance for conservation for the greater sandhill, and other listed and species of concern, because of impacts of climate change, the loss of the SOIA area would result in potentially significant and unavoidable impacts to Greater Sandhill Cranes and lesser sandhill cranes.

Though this DEIR is not specifically required to analyze the impact of climate change, the SSHCP is required to do so, and it identified the upland foraging areas like that in the West and South Study Areas, as well as upland habitat near Galt, to be an important part of the Conservation Strategy for Greater Sandhill Cranes and as a result requires that at least 1,000 acres of this important foraging habitat to be conserved. The fact that Elk Grove has West and South Areas makes that SSHP requirement at a minimum increasingly expensive, and at a maximum not possible. This important impact on the SSHCP was not analyzed.

### **Impact on the South Sacramento Habitat Conservation Plan**

Impact 5.4.6 states:

Because the SSHCP has not been adopted or implemented at this time, there would be **no impact** related to potential conflicts with an adopted habitat conservation plan under existing conditions...

The proposed West and South Study Areas, which total approximately 5,200 acres, are located outside the UDA and within PPU 6. Though future development in the West and South Study Areas would preclude the use of this area as mitigation lands in PPU 6, the mitigation for the loss of Swainson's Hawk foraging habitat, which would be required of all development projects in these areas, as well as mitigation for impacts for other biological resources, would contribute to the SSHCP's overall conservation goals. Thus, development allowed under the General Plan would not be inconsistent with the provisions of the SSHCP, if it is adopted.

It is disingenuous to dismiss significant and damaging impacts on the SSHCP because it has not yet been adopted, especially because adoption is imminent. It is also simply untrue that removing 5,200 acres from the inventory from the SSHCP "would not be inconsistent with the provisions of the SSHCP."

The SSHCP must be able to assure that it can successfully implement the conservation strategy, which is the heart of the Plan. One of the issues with the West and South Study Area and the SSHCP is that in the western portion of the SSHCP plan area it undermines the "feasibility of acquisition," which reflects the likelihood of being able to successfully acquire the necessary amount of mitigation land. The "feasibility of acquisition" is expressed as a percentage of the available "inventory" that must be purchased to meet mitigation needs – the higher the percentage the harder it is to meet the acquisition needs. A "feasibility" of 50% means that half of all suitable land in the "inventory" side of the Plan area would need to be purchased to comply with the conservation strategy. Since lands will only be purchased from willing sellers, the likelihood for success would be extraordinarily small. The current "feasibility for acquisition" in the western portion of the plan area is close to the 15% that the California Department of Fish and Wildlife feels will ensure that enough willing sellers can be found to complete the land acquisitions

required in the Plan. The loss of the inventory that is within the West and South Areas would drive that number upward above that which the CDFW feels is acceptable.

The fact that Elk Grove is no longer a participant in the SSHCP does not change the fact that they would need to be doing land acquisition mitigations in the same footprint as the SSHCP. (Please refer to the January 12, 2018 letter from the California Fish and Wildlife Service that clearly states that mitigation Swainson's Hawk impacts in the area immediately to the south of Elk Grove need to be mitigated in Preserve Planning Unit 6 of the SSHCP) The impact to the SSHCP is doubled by the fact that any West and South Study Area urbanizations would remove needed acreage from the "inventory" side of the plan (the side where land is acquired) reducing the available footprint that the SSHCP has to do its own mitigations, and then it would remove another equal amount of land from the "inventory" side of the Plan because it would have its own land acquisition mitigation requirements to fulfill. So as an example, if LAFCo approved an expansion in the SOI of 1,000 acres, the hit to the SSHCP's inventory of available lands for acquisition would be 2,000 acres.

### **Special Status Wildlife and the reliance on the CNDDB**

It is fairly clear that the CNDDB (California Natural Diversity Database) was the main source of information that was used in determining what special species should be considered for analysis. The CNDDB states that "(i)t is a positive detection database. Records in the database exist only where species were detected." The CNDDB states as a disclaimer to use of its databases: "We work very hard to keep the CNDDB and the Spotted Owl Database as current and up-to-date as possible given our capabilities and resources. However, we cannot and do not portray the CNDDB as an exhaustive and comprehensive inventory of all rare species and natural communities statewide. Field verification for the presence or absence of sensitive species will always be an important obligation of our customers." This means that the absence of a record does not mean that a species is not present. It is also important to realize that for avian species there is a bias towards nesting data over occurrence data. There were and are many other available sources of occurrence data available for the vicinity of the SOIA area including information from the Cosumnes River Preserve, Stone Lakes National Wildlife Refuge, Christmas bird counts (the Rio Cosumnes count includes the SOI area), and eBird to list a few. Reviewing some of this other available data, and a literature search of specific species, indicates species that should have been included in the analysis that weren't.

Some of the additional special status avian species that should have been considered based on occurrence information from Christmas bird counts for the Rio Cosumnes Area, as well as species occurrence data from the Bufferlands and the Cosumnes River Preserve, are: double crested cormorant, white faced ibis, whimbrel, long billed curlew, California gull, cooper's hawk, sharp shinned hawk, ferruginous hawk, prairie falcon, merlin, short eared owl and Lewis' woodpecker. For some of these ignored avian species, the West and South Study Areas are important habitat, like the long billed curlew. We again caution on relying solely on the CNDDB for analysis of these species and suggest a deeper literature review as well. As an example, long billed curlew habitat

is commonly listed as grassland, but a more in depth review also indicates that in the Central Valley of California it commonly uses agricultural fields as well, and has a marked preference for irrigated alfalfa and irrigated pasture (Shuford et al, “The importance of Agriculture to the Long-Billed Curlew in California’s Central Valley in Fall”), both of which are present in the West and South Study Areas.

Some additional mammalian species that should have been considered are: the Ornate Shrew, Pallid Bat, Spotted Bat, Townsend’s Big-Eared Bat, Western Mastiff Bat, and the California Kangaroo Rat. For reptiles, the Coast Horned Lizard should have been considered and analyzed.

## Conclusion

The environmental document is inadequate and incomplete in its discussion and recognition of 1) the significance of MTP/SCS Plan inconsistency, 2) water supply uncertainty and groundwater aquifer impacts, 3) the importance of foraging habitat in the growth study areas for sandhill cranes and 4) consistency with the SSHCP.

We believe that these concerns are significant to the extent that removal of the growth study areas from the General Plan is warranted. Regardless, the environmental document is remiss and inadequate in its failure to recognize that there are feasible policy mitigation measures.

ECOS recommends that environmental document recognize the following policy mitigation measures:

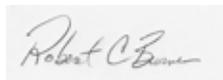
1. Elk Grove will not apply for or support applications for Sphere of Influence expansion until the necessary acquisitions to meet the conservation targets of the SSHCP for the sector in question are executed.
2. Elk Grove will not apply for or support applications for Sphere of Influence expansion until 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. Elk Grove will not apply for or support applications for Sphere of Influence expansion 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