

Table A-1. Notice of Prepara	tion Comment Letters		
Date Respondent	Organization	Topics	NOP Response
March 10, 2016 Matthew G Darrow, PE, TE, PTOE	DOT	Transportation	 Future urbanization will affect rural roadways. The City should participate in bringing any affected roadways up to standard. The City should enter into a maintenance and operations agreement for the public roadway infrastructure and shared public roadway facilities. Frontage improvements should be the responsibility of future development projects at the time future annexation occur. We do not anticipate making any financial contributions towards roadway widening of shared roads. The City should enter into a cross jurisdictional reciprocal funding agreement with the County to assess impacts and mitigation measures. The County's impacted roadways should be mitigated and improvements installed according to the County's standards. The traffic study in the environmental document should analyze all impacted roadways and intersections in both the existing and cumulative conditions. It's anticipated that these will include Grant Line Road, Kammerer Road, West Stockton Boulevard, Bruceville Road, Bilby Road, Franklin Boulevard, Hood Franklin Road, etc. and associated intersections at a minimum. The City should enter into a maintenance and operations agreement for the public roadway infrastructure and shared public roadway facilities. The City should enter into a cross jurisdictional reciprocal funding agreement with the County to assess impacts and mitigation measures.
March 14, 2016 Sarenna Moore	Regional San/SASD	Utilities	 SASD will provide local sewer service for the proposed project area. Regional San provides conveyance from local trunk sewers to the Sacramento Regional Wastewater Treatment Plant (SRWTP) through large pipelines called interceptors. Please review the Interceptor Sequencing Study (ISS), SRCSD Master Plan 2000, 2010 System Capacity Plan Update (SCP). Per the SCP, the project area lies adjacent to the Laguna Ranch expansion trunk shed. Developers can seek reimbursement for these facilities. Regional San and SASD are not land use authorities; they design their sewer systems using information provided by land use authorities. Currently, no SASD trunk facilities are located in or planned to serve the project. Pipelines are not designed to accommodate additional flows. Comments about the process for wastewater treatment and the requirements of the NPDES discharge permit. Regional San does not have any planned facilities that could provide recycled water to the proposed project or its vicinity. In addition, Regional San is not a water purveyor and any use of recycled water must be coordinated between key stakeholders. Customers are responsible for rates and fees. The SASD and Regional San Ordinances are available on their websites. The developer must complete a sewer study that includes connection points and phasing information to assess the capacity of the existing sewer system, including any on-site or off-site impacts associated with constructing facilities. In order to receive services, the developer will need to construct new facilities or upgrade existing ones, working closely with SASD development services.
March 17, 2016 Salen Singh	None (Homeowner)	Project	 Would like all land fronting the east side of Rau Road to be included in the SOIA application. Fully support the effort
March 17, 2016 Dr. Verghese Mathew Dr. Elisabeth Mathew		Project	 Would like all land fronting the east side of Rau Road to be included in the SOIA application. Fully support the effort
March 21, 2016 Sharaya Souza	Native American Heritage Commission	Cultural Resources	 Regulatory information on AB 42, SB 18, and Section 106. The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Recommend avoidance and preservation of the resources in place. Treating the resource with culturally-appropriate dignity. Permanent conservation easement. Include measures for identification and evaluation of inadvertently discovered archaeological resources, recovered cultural items, and human remains.
March 30, 2016 Stephanie Tadlock	Central Valley Regional Water Quality Control Board	Hydrology	Information on regulatory framework and permitting requirements
March 31, 2016 Scot Finley	Friends of the Stone Lakes National Wildlife Refuge	Biological resources, cumulative impacts	 Provided info on the Stone Lakes Refuge. The Refuge borders the western edge of Interstate 5, just west of the project area. The Refuge will therefore be directly impacted by the project. The project area includes significant acreages of important agricultural lands which provide foraging habitat for many waterfowl and raptor species. The annexation and development of additional land within the watershed draining into the Stone Lakes NWR could impact flood flow patterns and water quality of water entering the Refuge. The EIR must look at the growth inducing impacts of the project and cumulative impacts. Note the Kammerer Road Extension Project, the potential casino at Lent Ranch. Approval of the project will conflict with the Refuge's Comprehensive Conservation Plan. Development of the project area would impact the Refuge because it would increase land values, reduce the opportunity to acquire fee title and conservation easements, and increase urban use conflicts with resource management activities. A requirement that Elk Grove demonstrate prior to annexation that its proposed development plan will not change the amount, timing and quality of water entering the Refuge. Require that any annexation proposal include provisions for securing the acquisition of development rights for a buffer.

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April 1, 2016	Tom Zlotkowski	Capital Southeast Connector JPA	Traffic, air quality, noise	 Provided information on the Connector Project It appears that the Connector Project may provide the primary access to the proposed SOIA Area and therefore the planned uses could introduce significant additional trips on the Connector Project, which was never intended to serve urban uses south of Kammerer Road. Please sure that the trip generation provided by the traffic model is utilized to evaluate the traffic, air quality, and noise impacts for the Connector Project as both and peak hours of travel, Level of Service and Vehicle Miles Travelled, to the extent possible. 				
April 2, 2016	John R. Fletcher	John R. Fletcher Law Offices on behalf of Suburban Propane	Hazards and hazardous materials	 The vision and scope of the proposed project are fantastic for a different location. Consider cumulative impacts of the Sports Complex SOI and this project. Information provided on Suburban Propane facility, history, accident-free operation, etc. The City must consider the proximity of 24 million gallons of propane to 5,000 residential units and 20,000 new employees on the proposed site. Consider under Hazards and Hazardous Materials the effect that a catastrophe at Suburban Propane will have on the proposed development. The developers are small but the scope is impressively large. Their motivation is profit. Fire Chiefs of Elk Grove are opposed to any residential or dense development near Suburban Propane. Information provided on past expert analysis of risks from Suburban Propane. The City was influenced by a developer-selected consultant (Quest) and rejected the reports of all other consultants, including the report prepared by the Joint Task Force, paid for by the County of Sacramento. The City did not consider any information or findings that were contrary to the findings of Quest. It is ill advised to allow any development which brings dense populations within 1 mile of the facility. Suburban Propane has also opposed the 2006 Waterman Park project, the Triangle Point 75 Project, and the Lent Ranch marketplace. These arguments are applicable to the SOIA Amendment and should be reviewed. Although Suburban Propane has safety mechanisms and redundancies to lower the risk of accidents to that of statistical insignificance, neither Suburban Propane nor any governmental agency can guarantee that there will never be an intentional act which impacts the facility. Having a senior development, youth soccer tournament, County fair, or the proposed project with 5,000 residential units is ill-advised. 				
April 3, 2016	Paul Lindsay	None	Water, Traffic, Cumulative effects	 The City is currently reviewing its general plan and it is clear that the City intends to submit piecemeal applications for SOI decisions that basically include the entirety of its 2013 withdrawn application. The EIR must look at the city's expressed desire to include this and other areas designated as study areas for potential impacts in all the study areas. The EIR should include a water supply assessment. The applicant has stated his desire to mirror the proposed development to the north of Kammerer road. Similarly, the Transportation/traffic section states that it is not possible to estimate traffic. Consider the context in which this application appears. 				
April 4, 2016	Lynn Wheat, Allenya Kirby	Elk Grove Grasp	Water, Traffic, Cumulative effects	 The EIR must look at the broader context of development in Elk Grove. This SOIA is only one piece in a series of study areas that the City contemplates developing. The General Plan includes 4 separate study areas that mirror the failed attempt in 2013 to establish a SOI for approximately 8,000 acres on the southern border. The memo prepared for the scoping session was contradictory and failed to address larger issues. In some sections, development was assumed and the EIR was scoped to include this development. In Water and Transportation, the EIR was not scoped to include development. It is almost self-evident, especially given a private application for an SOI change, that the applicant's intent is to develop the land. Given recent drought, it is imperative that the EIR discuss water availability. The transportation/traffic impacts must be discussed. The main form of transportation is the automobile. E-Tran has had to cut back on services due to budget cuts. The City lacks the financial capability to maintain its existing roadways and is experiencing an 8 million dollar deficit each year. Transit cannot serve as mitigation. Consider the proposed usage of the Corridor (i.e., Kammerer Road) as the potential I-5 to US 50. The EIR should classify the SOIA as having an unavoidable significant impact on the City's fiscal ability to provide and maintain urban roadways in the project area. 				
April 5, 2016	Eric Fredericks	Office of Transportation Planning-South Branch	Traffic	 The Institute of Transportation Engineers (ITE) book indicates that total trips generated by this development are approximately 5,000 trips for the A.M. peak hour and 6,000 trips for the P.M. peak hour. This increase in total trips generated will increase congestion on SR 99 and I-5 during the peak periods. Specifically, Caltrans has concerns regarding the Hood Franklin/I-5 interchange. 1. On the Hood Franklin/I-5 interchange: a. Any queue which creates a speed differential on freeway from off ramp b. Any queue that over-fills its allocated storage c. Any storage which blocks a driveway or intersection d. Signal Warrants e. Impacts for bicyclists and pedestrians 2. We recommend that the project applicant identify traffic impacts in terms of Vehicle Miles Traveled (VMT), including the following: a. Peak hour zone to zone Origin-Destination (0-D) matrixes b. Peak hour VMT Calculation based on 0-D matrixes and trip generation c. Weekday zone to zone 0-D matrixes and trip generation d. Weekday VMT calculation based 0-D matrixes and trip generation Measures that would decrease VMT impacts on the State Highway System should be included in the analysis. Caltrans would like to know if the City plans on using the I-5 SCMP, a voluntary impact fee that is used to fund a set of transportation improvements. 				

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April 5, 2016	Tanya Sheya	California Department of Fish and Wildlife	Biological resources	 Although the SSHCP is not yet finalized, the proposed project would make it unlikely that the SSHCP would be able to meet the required mitigation standards. Comments on the biological scope of the EIR and CDFW standard suggestions for the study (i.e., CNDDB records search, jurisdictional delineation, site surveys, etc.). The proposed project is high-quality foraging habitat for Swainson's Hawk. The potential impact to the SWHA as a result of the increase of the City's SOI is significant. Attached comment on previous project from Tina Bartlett dated May 20, 2013 had the following comments: The proposed project is high-quality foraging habitat for Swainson's Hawk. The project area contains a high population of Swainson's hawk. Proposed mitigation measures such as a reconnaissance level survey. Although the SSHCP is not yet finalized, the proposed project would make it unlikely that the SSHCP would be able to meet the required mitigation standards. Support no project alternative. Measures for Swainson's hawk, jurisdictional waters, migratory birds and birds of prey. Fees as necessary. Reconnaissance survey
April 5, 2016	Charlene McGhee	Sacramento Metropolitan Air Quality Management District		SMAQMD staff looks forward to the opportunity to review and comment on the Draft EIR when it is released.
April 5, 2016	Rob Ferrera	Sacramento Municipal Utility District	Utilities	 SMUD is the primary energy provider for Sacramento County and the proposed project location. The proposed Kammerer Road/Highway 99 Sphere of Influence Project will have a significant impact on SMUD's electrical system. This increase in the load could require a new substation site in the vicinity. The following specific electrical requirements should be considered for the Kammerer Road/Highway 99 Sphere of Influence Amendment Project NOP and project design: Maintain existing PUE on Kammerer Road for existing and future 12/69KV overhead electrical facilities. Provide new PUE if SMUD facilities are relocated. SMUD has 230kV overhead transmission lines and structures located inside and within the immediate vicinity of the proposed project. Any proposed SMUD transmission facilities modifications/relocations by the project owner shall be performed under an executed cost recovery agreement. Project owner shall provide 18 months' timeframe to allow for design and construction of identified facilities. Project owner shall provide detailed engineering drawings for any improvements that are proposed within the SMUD transmission line easement. SMUD engineering will review the plans and provide comments as required. Under no circumstance shall any grading or construction activities be permitted within SMUD's transmission line easements without the conveyance of rights from SMUD's real estate department. Project owner or contractor shall comply with the clearance requirements between the proposed rail tracks and SMUD overhead transmission lines per G.O 95. Project owner or contractor shall abide the clearance requirements from all CAL-OSHA Title 8 approach distance as stated in Subchapter 5, Group 2, Article 37, during project construction. SMUD reserves the right to construct new or move existing facilities as necessary within its legal
April 6, 2016	Michael Monasky	None	Land use, biological resources, utilities, hazards and hazardous materials, transportation/traffic	 Consider the cumulative impacts of the soccer facility SOI request as well as the General Plan update study areas. There is vacant, undeveloped land within the city limits and many shuttered businesses. There will be a land use change or taxation jurisdiction change if the SOIA is approved. The project will have direct and immediate effects associated with probably future urbanization of the area. Homo sapiens are endangered and should be included in the Commission's reports. The EIR should include a water supply assessment. The EIR should include a Health Impact Assessment. The EIR should analyze particular buildings or uses. Where will the project obtain water for its 18,000–20,000 employees and 4,000–5,000 homes? The Commission is purposefully unclear when it states that the analysis of policy inconsistency will be necessarily be conceptual. The Commission should be able to estimate traffic. Suggestion that the Commission review biologist E.O. Wilson remarks about contiguous preserves. The NOP/EIR should study a consideration of this and the other "study areas" in development for wildlife and farmland buffers dedicated to such uses in perpetuity. Such development could include commercial farming, eco-tourism, wildlife research, recreation, establishment of refuges, and agricultural education programs. An economic study should be conducted. Develop on vacant land instead.
April 6, 2016	Jeff Ramos	Cosumnes Community Services District	Public services	 This future potential development will have an impact on parks, recreation and fire services provided by the Cosumnes Community Services District. The CCSD requests that these potential development impacts be considered. The commenter also provided recommended changes to the language from the Elk Grove previous SOI application that described fire protection services.

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April 7, 2016	George E. Phillips on behalf of Dale and Pat Mahon and the Kautz family (homeowners)	Phillips Land Law, Inc.	Cumulative effects	Mahon and Kautz are homeowners within the South of Grant Line (SoGL) visioning. The EIR should consider cumulative effects with respect to the multisport complex and the SoGL visioning area.
April 7, 2016	Robert Pierce	Elk Grove Unified School District	Public services	Any future intensification of land use within the proposed SOIA would have an impact on the EGUSD. It is imperative that the EGUSD be included in the preparation of the DEIR, in particular the analysis of the increased demand on public services, specifically schools. Additionally, we strongly recommend that transportation and traffic analysis in the DEIR include impacts related to school siting and supporting infrastructure.
April 7, 2016	Brandon Rose	Environmental Council of Sacramento (ECOS)	Biological resources, agricultural resources, water supply, greenhouse gases, growth inducement and cumulative impacts.	The IR must provide a need. The previous application did not and we do not feel the situation that schanged. A detailed accounting of File forw's holding apopropriate white included in the DIRI with thorough justification for the need for expansion. The DIRI must address Farmlands of Local Importance and provide appropriate mitigation. The DIRI would justify why the reasons for cotabilisting the Urban Services Boundary are no longer appropriate and applicable. This DIRI must clearly establish that this SOIA is inconsistent with the Mectropolina Transportation Plan / Sustainable Communities Strategy (MTP-SCS) and the Air Quality Artainment Plan (AQF). If this property were to be developed, achieving or maintaining greenhouse gas reductions to redeated accounts standards would be seriously imparted. The DIRI must not only address these two plans, but it must also quantify impacts to generolouse gas reductions tragets and electral cozone standards would be seriously imparted. The DIRI must not only address these two plans, but it must also quantify impacts to generolouse gas reductions tragets and electral cozone standards would be seriously imparted. Well of the provide and the seriously proposed transitional and uses to mitigate for growth using all available modeling tools and address the MOU between Sacramento County and Eld Grove that specifically proposes transitional land uses to mitigate for growth inducing impacts. Consider also the Southeast Connector Project. The EIR should consider the Southeast Connector Project. The EIR should explain how the development of this project will impact the conservation strategy of the SSIRCP. Brandon Rose and provided or copy of their comments on the DEIR for the previous SOIA (November 18, 2011). However, the majority of these comments are about the adequacy of that abcomment, not the scr

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				• At the time of submittal of any application to annex territory within the SOIA Area, the city of Elk Grove shall demonstrate consistency with the Sacramento Area Council of Government's Metropolitan Transportation Plan and Sustainable Communities Strategy.	
April 8, 2016	P. Scott Browne on behalf of the Cypress Abbey Company.	Law Office of P. Scott Browne	Scope	 We would like to keep the door open to possible expansion of the SOIA and EIR to include the Cypress Abbey Company property, at least the portion above the 100 year floodplain line. The property is adjacent to the railroad tracks with good access to Hwy 99 over the recently upgraded Grant Line Road. It is particularly suitable for employment related business and industrial development which could assist the City in improving its jobs-housing balance. In addition, a substantial portion of the Cypress Abbey Company property could be available for consideration for permanent agricultural and habitat conservation as a mitigation for development of other property within the Sphere Amendment territory. 	
April 8, 2016	Leighann Moffitt	Department of Community Development, Sacramento County	Cumulative impacts, Alternatives	 The EIR should include analysis of potential impacts on the proposed SSHCP. Given the SSHCP and General Plan policy goals, the EIR should include an alternative that provides a buffer between urban development and the potential future USB location. This buffer could be used for habitat restoration or agricultural activities. If the project is approved, an amendment to the Sacramento County General Plan will be necessary to move the USB. Information on the South of Grant Line (SoGL) Visioning. The project may have growth-inducing impacts. The SoGL land use visioning process must be considered under cumulative impacts. 	
April 8, 2016	Suzanne Pecci	None	Water	 The proposed project is within the Sacramento County Water Agency (SCWA) Zone 40. The application area is also within the 2030 Water Study Area. Although there is no public service to the SOIA Area at this time, the domestic and agricultural wells that exist in the area fall under SCWA's regulatory authority to charge fees, tax, and fine. A letter of agreement from SCWA should be filed in order to reflect that the area will be served by SCWA. Bruce Kamilos is on the Advisory Committee of Florin Resources Research and Conservation District /Elk Grove Water District and was appointed 8-27-10 by Resolution of the Elk Grove City to SCWA. Mark Madison, manager of the Elk Grove Water District, stated in January that the city planned to remain in SCWA and did not have plans to form a local water agency. One of the applicants is Gerry Kamilos. I feel the relationship between the two Kamilos should be a matter of inquiry by LAFCo to dispel any appearance of conflict of interest. Information provided on the Groundwater Sustainability Management Act (SGMA). The SOIA will cause the SCWA to be split and require modification to existing groundwater management plans. The EIR should be in compliance with the SGMA. 	
O-D = AB = CDFW = City = CNDDB = County = DEIR = DOT = EIR = GHG = I-5 = ISS = ITE = kV = MOU = NAHC = NOP =	Origin-Destination Assembly Bill California Departmen City of Sacramento California Natural Div Sacramento County Draft Environmental In California Departmen Environmental Impact greenhouse gas Interstate 5 Interceptor Sequencir Institute of Transporta kiloVolt memorandum of under Native American Heri	ersity Database mpact Report t of Transportation Report ng Study stion Engineers		NPDES = National Pollutant Discharge Elimination System NWR = National Wildlife Refuge PUE = power usage effectiveness SACOG = Sacramento Area Council of Governments SASD = Sacramento Area Sewer District SB = Senate Bill SCMP = Subregional Corridor Mitigation Program SMAQMD = Sacramento Municipal Air Quality Management District SMUD = Sacramento Municipal Utility District SOI = Sphere of Influence SOIA = Sphere of Influence Amendment SR 99 = State Route 99 SSHCP = South Sacramento Habitat Conservation Plan SWHA = Swainson's Hawk SWRTP = Sacramento Regional Water Treatment Plant US 50 = U.S. Highway 50 USB = urban service boundary	

Commenter	Comment/Question
Commissioners	How does the Sphere of Influence (SOI) Amendment action relate to the future set of actions that would be required prior to urban development?
	Why wouldn't LAFCo wish to review a Municipal Services Review (MSR) prior to preparing an environmental impact report (EIR) to make sure that there is a feasible potential future project first?
	Will we discuss the potential impacts of changing the County of Sacramento County Urban Services Boundary (USB)? Would it be appropriate in the EIR to discuss potential future changes to the USB?
	Can we get input from the City of Elk Grove?
	When is timeline for completion of the EIR?
	How will you look at the impacts of the no-project alternative? Will you consider the impacts associated with employment development elsewhere if it does not occur in the proposed SOI Amendment Area? Jobs/Housing Ratio implications should be considered.
	What are the parameters that would be used for habitat mitigation and conservation/restoration goals now that Elk Grove is no longer part of the South Sacramento Habitat Conservation Plan?
Public Testimony	Consider relationship between project, the proposed multi-sports complex, and the City's ongoing General Plan Update
	Concern about land speculation
	Disagreement that the project does not have land use change
	City of Elk Grove should focus development in existing vacant and new businesses should go to buildings that are currently vacant
	LAFCo should study direct impacts associated with home building activities that could occur in the future on the project site
	LAFCo should consider impacts of the SOI Amendment on humans
	Commenter disagrees that a water supply assessment will not be prepared
	Commenter believes that a health impact assessment should be prepared
	Discussion of most of the development within the SOI Amendment Area being focused along the future Capital Connector corridor
	EIR should study hydrology and water quality effects associated with development of the SOI Amendment Area
	Commenter disagrees that without a land use plan, traffic along specific facilities cannot be estimated
	The EIR should consider withdrawal of the City of Elk Grove from the South Sacramento County Habitat Conservation Plan and cumulative effects associated with development of other areas on wildlife
	The EIR should consider dedicating the SOI Amendment Area and other study areas to farmland, eco-tourism, wildlife research, recreation, establishment of refuges, and agricultural education programs and the EIR should include an economic study describing and investigating the viability of these options, including through regional conservation partnerships
	LAFCo should review biologist E.O. Wilson's writings about setting aside large areas for natural open space