



Carmichael Creek Neighborhood Association, Inc.

Est. 1986

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May 24, 2006

Sacramento County Environmental Coordinator
827 7th Street, Room 220
Sacramento, California 95814

Re: Notice of intent to file a negative declaration, Langley Estates Community Plan Amendment, Control Number 04-CZB-SDP-EXP-0407, revised April 28, 2006

The purpose of this letter is to express our opposition to the proposed revised negative declaration and to provide you with information not included in the revised Initial Study of the environmental impacts of this project. In our opinion, this controversial project requires an Environmental Impact Report. We commented on the initial proposed negative declaration in the attached letter dated December 8, 2005.

In our letter dated December 8, 2005, we stated our belief that this project would set a precedent for upzoning within the NPA because there has never been an upzone in the Carmichael Creek NPA. A precedent is something done or said that may serve as an example or rule to authorize or justify a subsequent act of the same or an analogous kind. Once a parcel is upzoned, it then becomes a high density parcel. High density development begins to encroach on the semi-rural open space. Parcels that were isolated from high density development become adjacent to it and eligible for upzoning according to the reasoning of the revised Initial Study. Encroachment continues and eventually semi-rural open space vanishes. This domino-like loss of open space is demonstrated in the figure included in our December 8, 2005, letter.

The Initial Study was revised to state 'However, when upzones are approved that are adjacent to similarly zoned parcels already, the overall integrity of the lower density area remains intact and this argument in favor of further redevelopment becomes moot.' This statement is incorrect: the area of lower density is smaller and owners of low-density large lots adjacent to new high density development would expect to be able to upzone based on the precedent established when their neighbor was allowed to upzone.

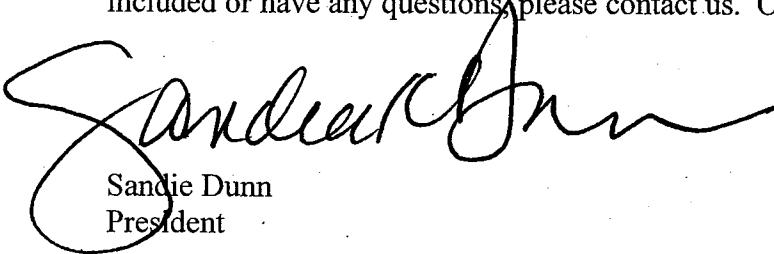
In addition, the Initial Study was revised to state 'The approval of the expansion of this sphere for one project would not automatically cause subsequent requests for further expansion to be granted; each would be considered independently.' This statement is irrelevant because all upzones have to be considered one at a time. Future upzone requests would rely on the precedent established by this upzone request.

The impact of upzoning all the RD1 and RD2 lots in the NPA to RD3 should be considered by an Environmental Impact Report. Our analysis of lots within the NPA found that there are 156

RD1 and RD2 lots greater than or equal to 0.66 acres. If these lots were upzoned to RD3, approximately 353 additional lots beyond existing zoning would be buildable in the NPA. Assuming 2.7 new residents per lot, this would result in 953 additional residents in the NPA beyond existing zoning.

Thus the reasonably foreseeable environmental consequences from this precedent-setting action would be un-planned growth, i.e. growth inducement. The cumulative effect of 353 additional homes and 953 additional residents in the NPA above existing zoning on the environment must be studied before the magnitude of its effects is known. This unplanned growth would impact the environment of our semi-rural neighborhood, reducing habitat for wildlife, which the large low density lots sustain, adding lighting, adding noise, adding vehicular traffic, worsening air quality, and increasing flood hazards.

We oppose the proposed negative declaration and believe that this controversial project requires an Environmental Impact Report. If you would like copies of supporting documents we have not included or have any questions, please contact us. Our Email is ccna@carmichaelcreek.org.



Sandie Dunn
President

attachment:

December 8, 2005 letter from CCNA to DERA

cc:

Sacramento County Supervisor Susan Peters
Carmichael Colony Neighborhood Association
Kenneth Garfield Neighborhood Association