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## **3.10 - Land Use and Planning**

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### **3.10.1 - Introduction**

This section describes the existing land uses and potential effects from project implementation on the site and its surrounding area. Descriptions and analysis in this section are based on review of the Sacramento County General Plan; the Sacramento County Zoning Ordinance Code; the Sacramento County Elk Grove Community Plan; the Sacramento County Laguna Community Plan; the City of Elk Grove General Plan; LAFCo Policies, Standards, and Procedures Guidelines; the Stone Lakes National Wildlife Refuge Comprehensive Conservation Plan; the Sacramento Delta Land Use and Resource Plan; and the Draft South Sacramento Habitat Conservation Plan.

### **3.10.2 - Environmental Setting**

#### **Regional Setting**

The Sphere of Influence Amendment (SOIA) Area is located adjacent to the southern and southeastern boundary of the Elk Grove City Limits within an unincorporated area of Sacramento County, California (Refer to Exhibit 2-1). Sacramento County is located adjacent to the Sacramento Delta within the transition area between the Sacramento and San Joaquin valleys. The San Francisco Bay is located beyond the Sacramento Delta to the west and the Sierra Nevada Mountains and foothills are located to the east. Areas north of the SOIA Area and Elk Grove are dominated by the unincorporated urban areas of Sacramento County, the City of Sacramento and surrounding cities and communities. Areas to the south are dominated by the Dry Creek and Consumes River floodplain, agriculture, and open space.

#### **Local Setting**

The City of Elk Grove Planning Area, as identified in Figure 1 of the Elk Grove General Plan (2003), includes land within the incorporated City limits of Elk Grove and unincorporated areas of Sacramento County surrounding the City (Exhibit 3.10-1). The City of Elk Grove's Sphere of Influence (SOI) boundaries are currently coterminous with the city limits. The Elk Grove General Plan provides land use planning for the City and the larger Planning Area. The Planning Area is intended to be an area in which the City has an interest in guiding land use decisions by the County of Sacramento, and is envisioned as the area into which the incorporated city boundaries may eventually expand. The County of Sacramento's Urban Service Boundary and Urban Policy Area are illustrated in Exhibit 3.10-2 as they relate to the proposed SOIA Area.

#### **Existing Land Uses**

The proposed SOIA Area consists of 7,869 acres. The Sacramento County General Plan establishes land use designations within the SOIA Area (Exhibit 2-7). The existing land uses within the SOIA Area are primarily agricultural. Other land uses include residential, industrial, commercial, open space, floodplains, and undeveloped lands (City of Elk Grove 2008, rev. 2010). Table 3.10-1 and

**Land Use**

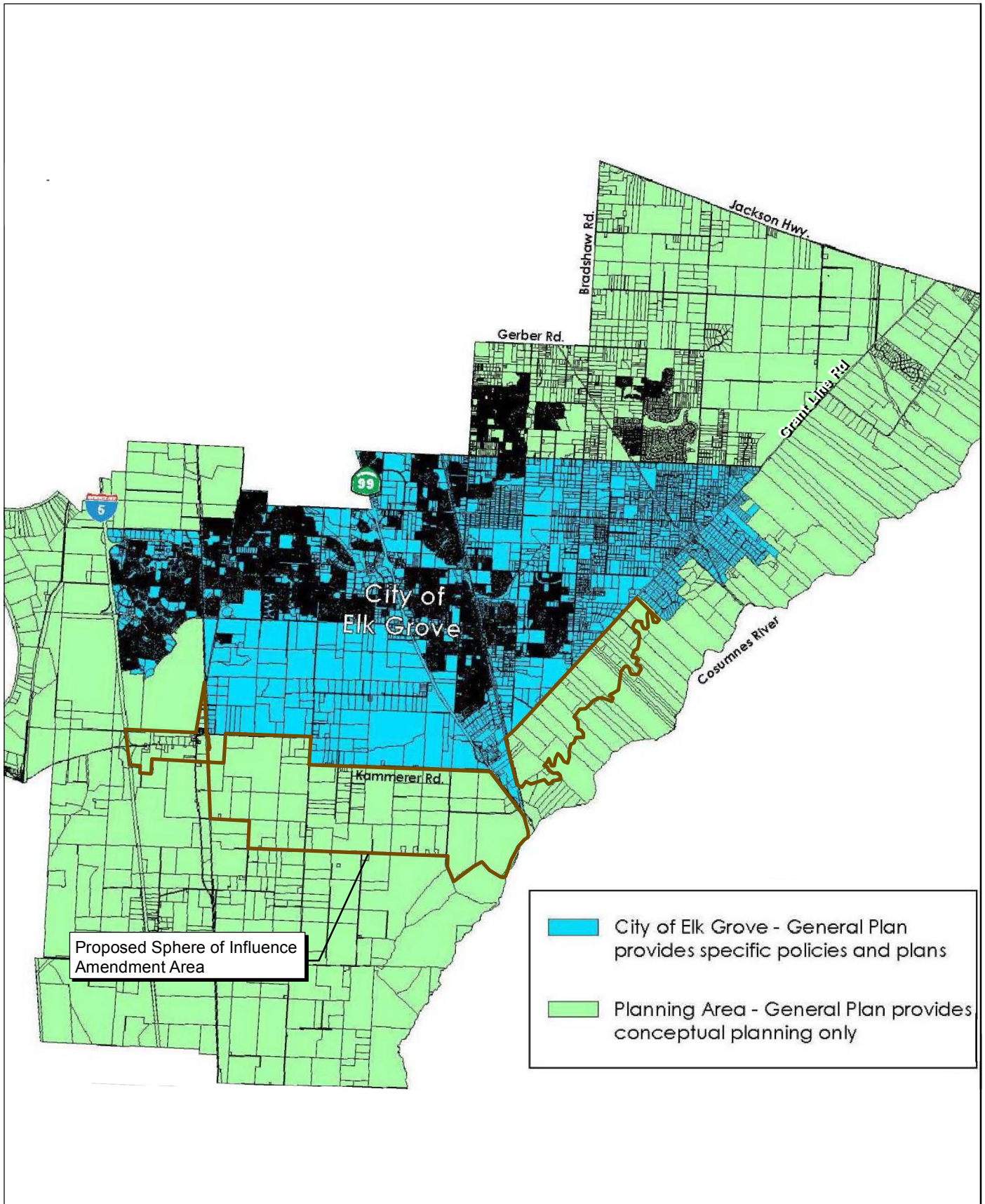
Table 3.10-2 include the current land use and zoning designations, as defined by Sacramento County, within the SOIA Area.

**Table 3.10-1: Land Use Designations within the SOIA Area**

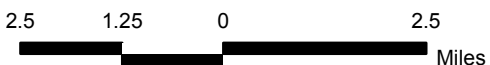
Sacramento County Land Use Designation	Acreage within SOIA
Agricultural Cropland	5,645
Agricultural Cropland – Resource Conservation Area	463
Agricultural-Residential	27
Commercial/Office	14
General Agriculture (20 acre minimum parcel size)	1,521
Intensive Industrial	34
Low Density Residential	87
Natural Preserve	78
<b>Total</b>	<b>7,869</b>
Source: City of Elk Grove 2008, rev. 2010.	

**Table 3.10-2: Zoning Designations within the SOIA Area**

Sacramento County General Zoning Designation	Acreage within SOIA
A2 (Interim Agricultural Zone – 2 acre minimum parcel size)	53
AG20 (Permanent Agricultural Zone – 20 acre minimum parcel size)	302
AG40 (Permanent Agricultural Zone – 40 acre minimum parcel size)	53
AG80 (Permanent Agricultural Zone – 80 acre minimum parcel size)	7,328
AR2 (Agricultural/Residential Zone – 2 acre minimum parcel size)	18
AR10 (Agricultural/Residential Zone – 10 acre minimum parcel size)	50
LC (Limited Commercial Zone)	8
M2 (Heavy Industrial Zone)	20
R1A (Single Family Zone – 5,200 square foot minimum lot size)	35
RR (Recreation Reserve Zone)	2
<b>Total</b>	<b>7,869</b>
Source: City of Elk Grove 2008, rev. 2010.	



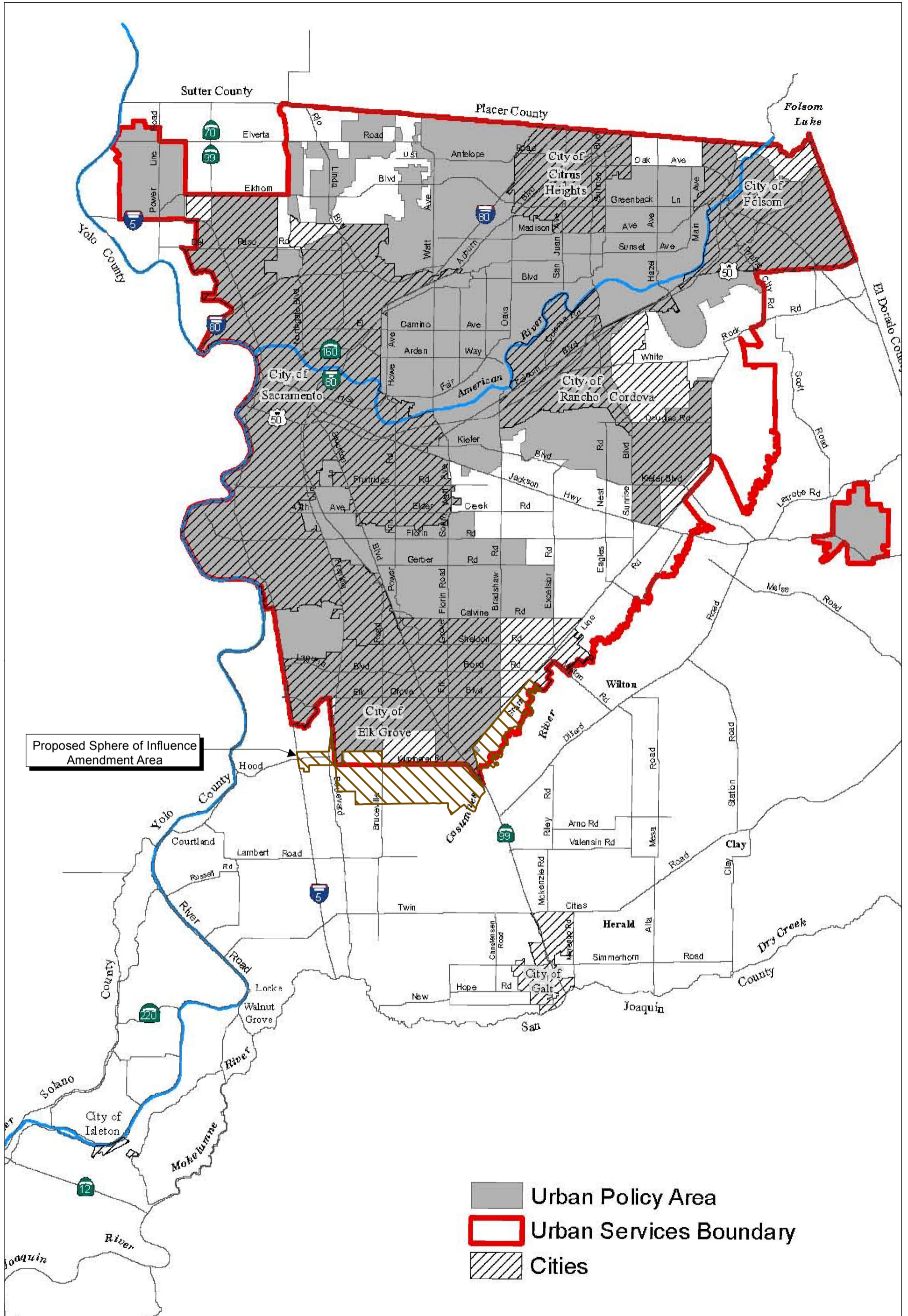
Source: City of Elk Grove.



## Exhibit 3.10-1 City of Elk Grove Planning Area







Source: County of Sacramento Planning & Community Development Department.



## **Surrounding Land Uses**

Land uses surrounding the SOIA Area consist of residential, industrial, and commercial areas, open space areas, rural residences, and large areas of agriculture.

### *West*

Stone Lakes National Wildlife Refuge, consisting of natural habitats and agricultural resources, forms the western boundary of the project site. The Stone Lakes National Wildlife Refuge lies within the Community of Delta that lies west of the project site. Land uses within the Refuge include aquatic habitat, annual grasslands, seasonal wetlands, pastures, oak woodlands, and agricultural uses.

Agricultural uses occupy the area immediately adjacent to the proposed SOIA's western boundary. County of Sacramento land use designations west of the project site include Agricultural Cropland and Resource Conservation Area.

### *North*

The project site is bounded by the City of Elk Grove to the north. Residential uses dominate the eastern portion of the City and agricultural uses occur in the western portion of the City, to the north of the SOIA boundary. City of Elk Grove land use designations north of the project site include Commercial, Medium Density Residential, Southeast Policy Area, Low Density Residential, and Estate Residential. Proposed projects within the Southeast Policy Area include Sterling Meadows, which consists of 984 single-family homes and 200 multi-family units, and a mall.

### *East*

The community of Cosumnes and the unincorporated communities of Wilton and Sheldon lie to the east of the project site. Both Wilton and Sheldon are primarily rural in character and rural residential development on large lots is typical of the communities. Rural residential and agricultural uses exist immediately east of the project boundary. The Cosumnes River and Dry Creek with the associated FEMA 100-year floodplain form the eastern boundary. County of Sacramento land use designations east of the project site include Agricultural Cropland and Natural Preserve.

### *South*

The unincorporated communities of Bruceville and Point Pleasant lie to the south of the proposed SOIA boundary. Land uses in this area are similar to the adjacent agricultural land uses within the project site. County of Sacramento land use designations south of the project site include Agricultural Cropland.

## **3.10.3 - Regulatory Framework**

### **Federal**

#### ***Stone Lakes National Wildlife Refuge Comprehensive Conservation Plan***

The Stone Lakes National Wildlife Refuge (Refuge) is located approximately 10 miles south of the City of Sacramento, straddling Interstate 5 (I-5) from the town of Freeport south to Lost Slough. The Refuge conserves and enhances a range of Sacramento-San Joaquin Delta and Central Valley habitats

and the fish, wildlife, and plants they support. The Refuge reduces further habitat fragmentation and buffers the effects of urbanization on agricultural lands and adjacent natural areas within the Delta region. The Refuge's Comprehensive Conservation Plan was prepared to guide the management of fish, wildlife, plants, and other natural resources and visitor use on the Refuge (U.S. Fish and Wildlife Service 2007). The SOIA Area is located directly adjacent to the Refuge's western boundary near the Hood Franklin/I-5 interchange. While the Refuge's Comprehensive Conservation Plan does not contain policies specific to the SOIA Area, several policies are generally applicable to the proposed project:

- **Objective 1.L – Strategy 6:** Continue to participate actively in regional land use planning by State, county, and municipal entities that may affect Refuge resources or complement Refuge conservations goals.
- **Objective 1.N – Strategy 4:** Develop strategies to work with local landowners, businesses and neighborhood organizations within the watershed to educate and reduce quantities of pesticides and runoff entering the Refuge.
- **Objective 2.A – Strategy 4:** Develop and host workshops to provide private landowners with information about USDA, NRCS, other Federal, State, and private grant and incentive programs aimed at maintaining small grain fields for crane forage and protecting or enhancing other habitats important for wintering crane within a five-mile radius of the Refuge.

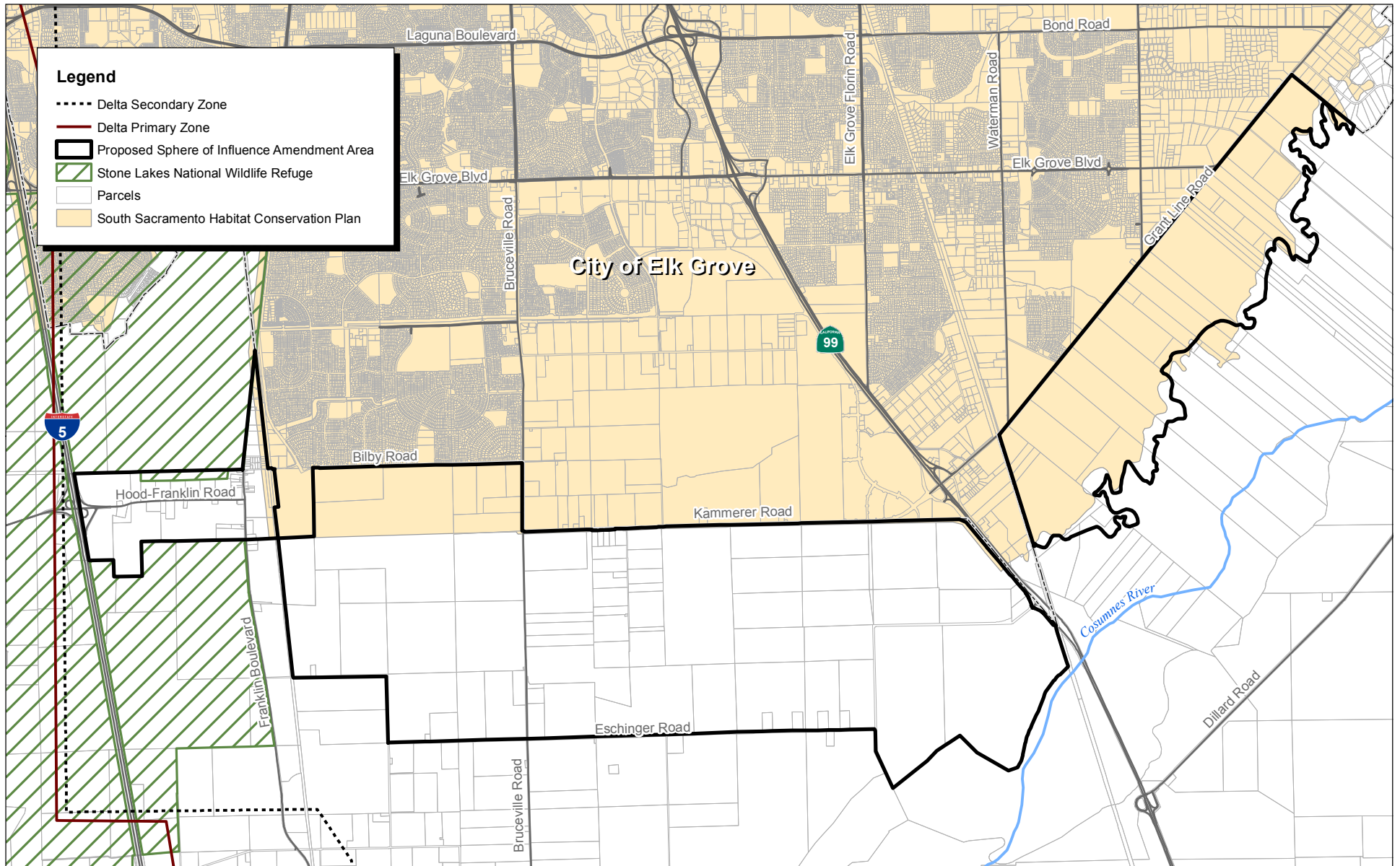
The Stone Lakes National Wildlife Refuge Comprehensive Conservation Plan, Sacramento Delta Land Use and Resource Plan, and Draft South Sacramento Habitat Conservation Plan include areas within or adjacent to the proposed SOIA Area, as shown in Exhibit 3.10-3. As shown in the exhibit, the SOIA Area is not in the Delta primary or secondary zones.

## **State**

### ***Cortese-Knox-Hertzberg Local Government Reorganization Act***

The Cortese-Knox-Hertzberg Local Government Reorganization Act (Act) of 2000 establishes procedures for the establishment, updating, or amendment of an SOI. The Sacramento Local Agency Formation Commission (LAFCo) is the agency responsible for the approval of the proposed Elk Grove SOIA and is responsible for implementing the Act. The Act's purpose (Section 56301) is the discouragement of urban sprawl and the encouragement of the orderly formation of local agencies based upon local conditions and circumstances. Section 56425 of the Act grants LAFCo the authority to carry out its purposes and responsibilities for planning and shaping the logical and orderly development and coordination of local governmental agencies to advantageously provide for the present and future needs of the County and its communities.



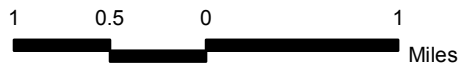


Source: County of Sacramento, City of Elk Grove, 2009. USFWS National Cadastral Data, 2011.



Michael Brandman Associates

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## Exhibit 3.10-3 Conservation Areas



The Commission shall develop and determine the SOI of each local governmental agency within the county to promote the logical and orderly development of areas within the sphere, consistent with written policies, procedures, and guidelines adopted by the Commission.

Specific policy elements established by the act are as follows:

- To encourage orderly growth and development patterns (Section 56001);
- To shape the development of local agencies so as to advantageously provide for the present and future needs of each county and its communities (Section 56301); and
- To guide development away from open space and prime agricultural land uses unless such action would not promote planned, orderly, and efficient development (Section 56377).

### ***Sacramento Delta Land Use and Resource Plan***

The Delta Protection Act of 1992 (Act) established the Delta Protection Commission, a State entity to plan for and guide the conservation and enhancement of the natural resources of the Delta, while sustaining agriculture and meeting increased recreational demand. The Act defined a Primary Zone, which comprises the principal jurisdiction of the Delta Protection Commission. The Secondary Zone is the area outside the Primary Zone and within the “Legal Delta.” The Secondary Zone is not within the planning area of the Delta Protection Commissions (Delta Protection Commission 2010). The proposed SOIA Area is located adjacent to the Primary and Secondary zones of the Delta.

## **Local**

### ***Sacramento LAFCo***

The Legislature has charged the LAFCo with carrying out changes in governmental organization to promote specified legislative policies now codified in the Act. LAFCo has both the local and countywide perspective necessary to implement the policies of the Act. Decisions relating to the most efficient form of local government and the preservation of agricultural land inherently involve the balancing of potentially competing interests of jurisdictions, because applications for change of organization may involve the interests of the County, a city, and one or more special districts. Sacramento LAFCo has developed standards and guidelines in its Policies, Standards, and Procedures Guidelines (discussed later in this section) that aid in the implementation of the Act.

### ***County of Sacramento General Plan***

In California, land use planning is primarily the responsibility of local government. The State requires that each California city and county adopt a General Plan that establishes goals, policies, and implementation measures for long-term development, for protection from environmental hazards, for neighborhood preservation, and for the conservation of identified natural resources, while also accommodating urban development. The County of Sacramento General Plan was adopted in 1993.

**Land Use**

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The County is currently in the process of updating its General Plan document. The 2030 Sacramento County General Plan was recommended for adoption at the May 27, 2010 Board of Supervisors hearing, and a series of ongoing hearings are currently underway to finalize approval. Because the 2030 Sacramento County General Plan is not yet adopted, elements and policies of the current, adopted General Plan that are pertinent to the proposed SOIA Area are summarized below.

*Land Use Element*

The goal of the General Plan Land Use Element is to encourage “. . . an orderly pattern of land use that concentrates urban development, enhances community character and identity through the creation and maintenance of neighborhoods, is functionally linked with transit, and protects the County’s natural, environmental, and agricultural resources.” The General Plan contains an Urban Growth Management Strategy with the intent of directing “Sacramento County towards an urban character by focusing policy upon a specific area where growth will occur, the Urban Policy Area (UPA), within a larger ultimate growth area delimited by an Urban Services Boundary (USB).”

Within the UPA, the General Plan directs how growth will occur through (1) redeveloping portions of the developed urban area and building out vacant urban areas, and (2) developing new urban growth areas and building out existing Agricultural-Residential land uses in urbanizing areas.

Strategies, goals, and objectives of the Plan pertinent to the proposed SOIA Area are discussed below.

*Urban Service Boundary*

The General Plan designates a USB to indicate the ultimate boundary of the urban area in the unincorporated area of Sacramento County. The General Plan states the following:

The Urban Service Boundary indicates the ultimate boundary of the urban area in the unincorporated County. This boundary, which is based upon natural and environmental constraints to urban growth, is intended to be a permanent boundary not subject to modification except under extraordinary circumstances. The USB should be used by urban infrastructure providers for developing very long-range master plans which can be implemented over time as the urbanized area expands (Sacramento County 1993).

As shown in Exhibit 3.10-2, the proposed SOIA Area west of State Route 99 (SR-99) is located directly south of the USB’s southernmost boundary, while a majority of the SOIA Area east of SR-99 is located within the USB.

*Urban Policy Area*

The County of Sacramento also designates an Urban Policy Area (UPA), which is intended to indicate geographic areas where urban development is expected to occur during the projected buildout of the General Plan (year 2013). The UPA is intended to provide a 20-year supply of developable

land sufficient to accommodate projected growth. The UPA also includes additional land to ensure an appropriate supply. The General Plan states:

The Urban Policy Area defines the area expected to receive urban levels of public infrastructure and services within the 20-year planning period. Defining the Urban Policy Area is of key importance in the provision of urban services and infrastructure to the unincorporated County, as it provides the geographic basis for infrastructure master plans, particularly for public water and sewerage, which require large capital investment and relatively long lead time for the installation of capital improvements (Sacramento County 1993).

The entirety of the proposed SOIA Area falls outside the UPA.

#### ***Sacramento County Ordinance Code***

The Sacramento County Ordinances and Codes provide regulation of land and structures in order to promote health, safety, and welfare of the public, and to insure the orderly development of the County. The Sacramento Zoning Code describes where specific allowed uses, such as residential development, may be located.

#### ***Sacramento County Elk Grove Community Plan***

The Sacramento County Board of Supervisors adopted the Elk Grove Community Plan in 1978. This document served as a guide for the future development of the Elk Grove area. This area covered approximately 26,500 acres, and included a portion of the current City of Elk Grove as well as portions of the currently defined Planning Area and proposed SOIA Area. The Elk Grove Community Plan was prepared to serve as a guide for future growth and development of the Elk Grove area. The plan included community goals, objectives, development policies, and a recommended pattern of future land uses based on community attitudes and aspirations (Elk Grove 2003).

#### ***Sacramento County Laguna Community Plan***

The Laguna Community Plan was adopted in December 1978 by the Sacramento County Board of Supervisors. This area covers approximately 18 square miles, between I-5, SR-99, Sheldon Road, and Elk Grove Boulevard. The Laguna Community Plan provided a policy framework for conservation and development within the Laguna community (Elk Grove 2003).

#### ***City of Elk Grove General Plan***

The City of Elk Grove General Plan is a broad framework for planning the future of Elk Grove. It is the official policy statement of the City Council to guide the private and public development of the City in a manner to gain the maximum social and economic benefit to the citizens.



The Elk Grove General Plan addresses a Planning Area outside the city limits in which the proposed SOIA Area is located. The Planning Area is larger than the proposed SOIA Area and represents the area that the City envisions may ultimately be included either in its Sphere of Influence or in the incorporated city limits (as shown on Figure 1 of the Elk Grove General Plan). While the City has no jurisdiction over the determination of land uses in the Planning Area, it can advise Sacramento County on land use policy within the Planning Area. While the Elk Grove General Plan provides a statement of the uses the City desires in the Planning Area, those statements are purely advisory.

The General Plan envisions the potential for converting agricultural land uses to urban land uses within the General Plan's Urban Study Areas located east of Grant Line Road and South of Kammerer Road. The majority of the proposed SOIA Area is located within the Elk Grove's General Plan Urban Study Areas (refer to Figure LU-2 of the Elk Grove General Plan).

### ***South Sacramento Habitat Conservation Plan***

The Draft South Sacramento Habitat Conservation Plan provides a regional approach to balancing development in concert with conservation and protection of habitat, open space, and agricultural lands. It protects 30 species of plants and wildlife, including 10 that are listed as threatened or endangered under the federal Endangered Species Act, the California Endangered Species Act, or both. The South Sacramento Habitat Conservation Plan also protects vernal pool, wetland, and stream habitats that are subject to the federal Clean Water Act and California's Porter-Cologne Water Quality Control Act. The South Sacramento Habitat Conservation Plan area lies between U.S. Highway 50 to the north, the Sacramento River levee and County Road J11 to the west, the Sacramento County line with El Dorado and Amador counties to the east, and the San Joaquin County line to the south, but it excludes the City of Sacramento, City of Folsom and its SOI area, lands of the Miwok tribe, and the community of Rancho Murrieta (County of Sacramento, et al. 2010).

### **3.10.4 - Methodology**

Michael Brandman Associates (MBA) evaluated the potential for land use impacts through the review of applicable land use policy documents. MBA reviewed the Sacramento County General Plan, the Sacramento County Ordinance Code, the Stone Lakes National Wildlife Refuge Comprehensive Conservation Plan, the South Sacramento Habitat Conservation Plan, and the Sacramento Delta Land Use and Resource Plan to identify applicable policies and provisions that pertain to the proposed project.

### 3.10.5 - Thresholds of Significance

According to Appendix G, Environmental Checklist, of the CEQA Guidelines, land use impacts resulting from the implementation of the proposed project would be considered significant if the project would:

- a) Physically divide an established community;
- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or,
- c) Conflict with any applicable habitat conservation plan or natural communities conservation plan.

Impacts related to the conversion of open space resources to urban uses are also analyzed in Impact LU-4.

### 3.10.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

#### Division of an Established Community

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**Impact LU-1:           The project would not physically divide an established community.**

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#### ***Impact Analysis***

The proposed project would extend Elk Grove's SOI boundaries as shown on Exhibit 2-2. Several small communities are located adjacent or proximate to the proposed SOIA Area, including Bruceville, Old Town Franklin, Point Pleasant, Sheldon and Wilton (Refer to Exhibit 2-6). Bruceville and Point Pleasant are south of the proposed SOIA Area and would not be affected by the SOIA. Old Town Franklin is immediately adjacent to the City and would be completely included within the SOIA Area. Implementation of the SOIA would place Old Town Franklin into the City SOI but would not result in any actions that may divide the community. Wilton and Sheldon are located across the Cosumnes River, outside of the proposed SOIA Area, and would not be included in the proposed SOIA Area. As such, the SOIA is consistent with the LAFCo policy requiring that an SOIA shall not split neighborhoods or divide an existing identifiable community of interest and no impact would occur.

#### ***Level of Significance Before Mitigation***

No impact.

**Land Use**

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**Mitigation Measures**

No mitigation is necessary.

**Level of Significance After Mitigation**

No impact.

**Conflict with Applicable Plans, Policies, or Regulations**

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**Impact LU-2:**            **The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.**

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**Impact Analysis**

The SOIA Area is included in the following regulatory land use documents:

- Sacramento County General Plan and Ordinance Code
- Sacramento County Elk Grove Community Plan and Laguna Community Plan
- LAFCo Policies, Standards, and Procedures Guidelines

*General Plan Consistency Analysis*

*County of Sacramento*

There are no proposed changes in land use or zoning within the proposed SOIA Area. The SOIA Area is located outside the Sacramento County General Plan’s Urban Policy Area. The SOIA Area located south of Kammerer Road and west of SR-99 is outside of the County’s Urban Service boundary. Land use designations and zoning are unchanged, and will remain consistent with the Sacramento County General Plan. Collaborative land use planning between the City of Elk Grove and Sacramento County for the SOIA Area may commence at an undetermined future time after the proposed SOI is established. Current land uses are anticipated to remain the same until such land planning occurs. As such, the proposed project would not change any existing land use or zoning designations and does not include the construction or development of any structures or infrastructure. Although there would be no direct physical impacts from the proposed project, it would result in the possibility of annexation and potential future development. Table 3.10-3 provides General Plan consistency determination with the County of Sacramento General Plan. Appendix D discusses other policies that were evaluated for consistency and would be more applicable once a definitive land use plan is proposed within the SOIA Area.

**Table 3.10-3: Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
Land Use	LU-7	The County shall not approve land use projects which are for noncontiguous development, i.e. leapfrog.	<b>Consistent:</b> The proposed project is consistent with this policy, as future urbanization of the project area by the City of Elk Grove would require annexation and will be evaluated separately under CEQA for development patterns.
	LU-9	Specific plans may be prepared for subareas of an urban growth area for the purpose of prioritizing development opportunities. In such cases, the Plan shall have defensible boundaries and address development of all lands within them.	<b>Consistent:</b> The proposed project is consistent with this policy, as future urbanization of the project area will be evaluated separately under CEQA. Development patters would be established through implementation of appropriate tools such as specific plans or master plans.
	LU-73	The County shall consult with state and federal regulatory and resource agencies during initial review of development projects to identify potential environmental conflicts and establish, if appropriate, concurrent application processing schedules.	<b>Consistent:</b> Any future development within the SOIA Area would comply with CEQA review that requires consultation with applicable regulatory agencies based on the type of development activity and impacts identified.
	LU-75	Except as permitted by LU-42, the County shall not accept applications to amend the General Plan Land Use Diagram from a designation in Column A to a designation in Column B for property located outside of the Urban Policy Area but within the Urban Service Boundary unless: <ul style="list-style-type: none"> <li>• The property adjoins property designated for urban land uses and its shape and extent comprise a logical extension of infrastructure and services; and</li> <li>• There is clear evidence that infrastructure capacity and service availability exist or can be easily extended to the property; and</li> </ul>	<b>Consistent:</b> The proposed project does not include a General Plan Amendment application. Any future development would be subject to CEQA review and address any land use conflict with the County General Plan.

**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		<p>The Board finds that the unincorporated area land supply within the Urban Policy Area contains an insufficient land supply to accommodate a 15 year supply of growth; or</p> <ul style="list-style-type: none"> <li>The Board determines that the property represents a minor and logical extension of the Urban Policy Area for the purpose of preparation of a Specific Plan or other development request.</li> </ul>	
Circulation	CI-2	Sacramento County shall conduct land use and transportation planning with a regional perspective.	<b>Consistent:</b> The proposed project does not result in any new land use designations or uses that would impact regional transportation. No physical development is being proposed at this time and no project applications have been submitted. However, future development would be subject to CEQA review and address land use and transportation impacts with a regional perspective to the extent feasible.
	CI-7	Sacramento County shall support market-based incentives and disincentives that promote the use of transportation alternatives.	<b>Consistent:</b> Any future development within the SOIA Area would evaluate opportunities for alternate transportation.
Open Space	OS-1	Permanently protect, as open space, areas of natural resource value, including wetlands preserves, riparian corridors, woodlands, and floodplains.	<b>Consistent:</b> The proposed project is consistent with this policy, as no development is being proposed that would impact open space areas, areas of natural resource including wetlands preserves, riparian corridors, woodlands, and floodplains. Approximately 87 percent of the project area is outside the FEMA 100-year floodplain except for the portions of the western SOIA Area. Future urbanization of the project area by the City of Elk Grove would require annexation and will be evaluated separately under CEQA. Any floodplain issues would be addressed at that time.



**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
Safety	SA-1	The County shall require geotechnical reports and impose the appropriate mitigation measures for new development located in seismic and geologically sensitive areas.	<b>Consistent:</b> Future development of the SOIA Area would be subject to CEQA review and require preparation of geotechnical report to comply with applicable seismic code. Refer to Section 3.6, Geology and Soils for further discussion.
	SA-3	The County shall support efforts by Federal, State, and other local jurisdictions to investigate local seismic and geological hazards and support those programs that effectively mitigate these hazards.	<b>Consistent:</b> Future development of the SOIA Area would be subject to CEQA review and address impacts from geologic and seismic conditions. Refer to Section 3.6, Geology and Soils for further discussion.
	SA-5	A comprehensive drainage plan shall be prepared for urbanizing streams and their tributaries prior to any development within the 100-year floodplain defined by full watershed development without channel modifications. The plan shall: <ol style="list-style-type: none"> <li>a. Determine the future 100-year flood elevations associated with planned and full development of the watershed;</li> <li>b. Determine the future 100-year floodplain boundaries for both flood elevations (planned and full development) based on minimum 2-foot contour intervals;</li> <li>c. Assess the feasibility of gravity drainage into the existing flowline of the stream;</li> <li>d. Assess the feasibility of alternative means of drainage into the stream;</li> <li>e. Identify potential locations for sedimentation ponds and other stormwater treatment facilities;</li> <li>f. Determine the minimum lowering of the stream bottom necessary and develop a channel design consistent with General Plan policies;</li> <li>g. Determine the location and extent of marsh, vernal pool and riparian habitat; and</li> <li>h. Develop measures for protecting and mitigating natural habitat.</li> </ol>	<b>Consistent:</b> The proposed project is consistent with this policy. Future projects would be evaluated on a case-by-case basis pursuant to CEQA and address impacts within 100-year flood zone and require preparation of a drainage plan. Refer to Section 3.9, Hydrology and Water Quality for further discussion.

**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		i. Develop measures to ensure vector abatement control. This policy is not applicable to downstream portions of urbanizing creeks identified as infill areas in Public Works Department policies for which the County does not intend to prepare master drainage plans.	
	SA-13	The County shall regulate, through zoning and other ordinances, land use and development in all areas subject to potential flooding and prohibit urban uses on unprotected flood land.	<b>Consistent:</b> The proposed project is consistent with this policy, as no development is being proposed that would impact open space areas, areas of natural resource value, including wetlands preserves, riparian corridors, woodlands, and floodplains. Approximately 87 percent of the proposed project area is outside the FEMA 100-year floodplain except for the portions of the western SOIA Area. Future urbanization of the project area by the City of Elk Grove would require annexation and will be evaluated separately under CEQA. Any floodplain issues would be addressed at that time.
Air Quality	AQ-4	Support AQMD’s development of improved ambient air quality monitoring capabilities and the establishment of standards, thresholds and rules to more adequately address the air quality impacts of proposed project plans and proposals.	<b>Consistent:</b> The proposed project is consistent with this policy as any future development would be required to comply with AQMD’s regulations and would be subject to CEQA review.
	AQ-5	Require the use of Best Available Control Technology (BACT) to reduce air pollution emissions.	<b>Consistent:</b> The proposed project is consistent with this policy as any future development would be subject to CEQA review and evaluate use of BACT to reduce air pollution.
	AQ-7	Support the use of demand management and pricing controls as near-term measures for attaining Air Quality Attainment Plan goals and policies.	<b>Consistent:</b> The proposed project is consistent with this policy, as any future development would be required to attain Air Quality Attainment Plan goals and policies.
	AQ-19	Identify the air quality impacts of development proposals to avoid	<b>Consistent:</b> The proposed project is consistent with this policy as any

Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis

Element	Policy		Consistency Determination
	No.	Text	
		significant adverse impacts and require appropriate mitigation measures or offset fees.	future development would be subject to CEQA review and evaluate air quality impacts.
	AQ-20	Submit development proposals to AQMD for review and comment in compliance with CEQA prior to consideration by the appropriate decision making body.	<b>Consistent:</b> The proposed project is consistent with this policy, as any future CEQA documents would be available to the Sacramento Metropolitan Air Quality Management District for review pursuant to CEQA.
	AQ-36	Coordinate air quality planning efforts with other local, regional, and state agencies.	<b>Consistent:</b> The proposed project is consistent with this policy, as any future CEQA documents would include discussion of air quality impacts that would result from the proposed project in coordination with other applicable agencies. Refer to Section 3.3, Air Quality for further discussion.
	AQ-38	A conformity analysis shall be conducted to assure that transportation plans, programs, and projects will not impair efforts to meet air quality standards.	<b>Consistent:</b> The proposed project is consistent with this policy, as any future CEQA documents would include discussion of air quality impacts that would result from the proposed project. Refer to Section 3.3, Air Quality for further discussion.
Public Facilities	PF-2	Municipal and industrial development within the Urban Service Boundary but outside of existing water purveyors' service areas shall be served by either annexation to an existing public agency providing water service or by creation or extension of a benefit zone of the SCWA.	<b>Consistent:</b> The proposed project is consistent with this policy as future urbanization and development within the SOIA Area may require service to be provided by the Sacramento County Water Agency. Refer to Section 3.16, Utilities and Service Systems for further discussion.
	PF-3	Public water agencies shall comply with General Plan policies prior to annexation of additional service areas.	<b>Consistent:</b> The proposed project is consistent with this policy as future urbanization and development within the SOIA Area may require service to be provided by the Sacramento County Water Agency. It is logical to assume that water agencies would comply with the applicable jurisdiction's general plan policies. Refer to Section 3.16, Utilities and Service Systems for further discussion.

**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
Hazardous Materials	HM-8	Continue the effort to prevent ground water and soil contamination.	<b>Consistent:</b> The proposed project is consistent with this policy as it acknowledges that future urbanization and development within the SOIA Area would be subject to local and federal regulations regarding leaking of hazardous materials and water and soil contamination. Refer to Section 3.8, Hazards and Hazardous Materials for further discussion.
	HM-9	Continue the effort to prevent surface water contamination.	<b>Consistent:</b> The proposed project is consistent with this policy as it acknowledges that future urbanization and development within the SOIA Area would be subject to local and federal regulations regarding leaking of hazardous materials and water contamination. Refer to Section 3.8, Hazards and Hazardous Materials for further discussion.
	HM-10	Reduce the occurrences of hazardous material accidents and the subsequent need for incident response by developing and implementing effective prevention strategies.	<b>Consistent:</b> The proposed project is consistent with this policy as it acknowledges that future urbanization and development within the SOIA Area would be subject to CEQA review and implement feasible measures to prevent accidents.
	HM-11	Protect residents and sensitive facilities from incidents which may occur during the transport of hazardous materials in the County.	<b>Consistent:</b> The proposed project is consistent with this policy as it acknowledges that future urbanization and development within the SOIA Area would be subject to local and federal regulations regarding hazardous materials. Refer to Section 3.8, Hazards and Hazardous Materials for further discussion.
	HM-12	Continue the effort through the Sacramento Metropolitan Air Quality Management District (AQMD) to inventory and reduce toxic air contaminants as emission standards are developed.	<b>Consistent:</b> The proposed project is consistent with this policy as any future development would be required to comply with AQMD's regulations and would be subject to CEQA review.
	HM-14	Support local enforcement of hazardous materials regulations.	<b>Consistent:</b> The proposed project is consistent with this policy as it acknowledges that future urbanization

Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis

Element	Policy		Consistency Determination
	No.	Text	
			and development within the SOIA Area would be subject to local and federal regulations regarding hazardous materials. Refer to Section 3.8, Hazards and Hazardous Materials for further discussion.
Agricultural	AG-1	The County shall protect prime farmlands and lands with intensive agricultural investments from urban encroachments.	<b>Inconsistent:</b> The proposed SOIA Area primarily consists of lands designated as Important Farmland. Approval of the proposed project in itself would not result in loss of farmland. However, it acknowledges that future urbanization would result in conversion of agricultural lands and constitutes a significant impact. Refer to Section 3.2, Agricultural Resources for further discussion.
	AG-5	Mitigate loss of prime farmlands or lands with intensive agricultural investments through CEQA requirements to provide in-kind protection of nearby farmland.	<b>Inconsistent:</b> The proposed project is inconsistent with this policy, as it could result in the loss of prime farmlands. Refer to Section 3.2, Agricultural Resources for further discussion.
	AG-19	County encourages the preservation of prime agricultural land as open space, including opposing any residential or commercial development for the Cosumnes River or Deer Creek riparian areas that are not compatible with agricultural use.	<b>Inconsistent:</b> The proposed project is inconsistent with this policy, as it could impact agricultural lands. Refer to Section 3.2, Agricultural Resources for further discussion.
Conservation	CO-1	Long range plans for accommodating population and economic growth shall not be based on the assumption of additional [water] supplies from future storage facilities on the Sacramento, American or Cosumnes River unless the projects are approved and funding secured.	<b>Consistent:</b> The proposed project is consistent with this policy as it acknowledges that City of Elk Grove in collaboration with County of Sacramento will begin comprehensive planning at an undetermined time pursuant to approval of the SOIA. No physical development is proposed at this time.
	CO-2	In new growth areas, until such time as the water plan being developed by the City-County Office of Metropolitan Water Planning (CCOMWP) provides for an alternative contracting authority, the Sacramento County Water Agency (SCWA) shall be the primary	<b>Consistent:</b> The proposed project is consistent with this policy as it acknowledges that the SOIA Area would likely be served by the Sacramento County Water Agency (SCWA). Refer to Section 3.16, Utilities and Service Systems for further discussion



**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		contracting agency with the United States Bureau of Reclamation to obtain additional surface water for delivery to new growth areas in the unincorporated area, where the SCWA will be the purveyor.	
	CO-9	Community and specific plans shall specify urban runoff control strategies and requirements, consistent with Master Drainage Plans and Public Work’s urban runoff management program, for development in newly urbanizing areas and identify sites where retention and treatment are warranted consistent with discharge permit requirement and county-wide runoff measures.	<b>Consistent:</b> Future development of the SOIA Area would be subject to CEQA review and address impacts from runoff. Refer to Section 3.9, Hydrology and Water Quality for further discussion.
	CO-26	Modify the yield estimates of ground water supply as supported by available data and, working in conjunction with area water purveyors, revise conjunctive use and other water supply policies as necessary during five-year General Plan updates.	<b>Consistent:</b> The City of Elk Grove has completed a Municipal Services Review to identify logical service providers for the proposed SOIA Area. Please note that all future development will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.
	CO-27	Maintain agricultural zoning, and existing agricultural uses, in primary aquifer recharge areas identified as having a moderate to very high recharge capability (Figure 1). Rezone applications for categories other than agricultural within one quarter mile of ground water recharge capability boundaries shall supply hydrologic data pertinent to recharge capability before the rezone application shall be considered complete.	<b>Consistent:</b> The proposed project is consistent with this policy, as it does not lie within an area of primary aquifer recharge. Refer to Section 3.2, Agricultural Resources for further discussion.
	CO-28	Discourage urban land uses in unincorporated areas with moderate to very high ground water recharge capability.	<b>Consistent:</b> The proposed project is consistent with this policy, as it does not lie within an area of primary aquifer recharge. Refer to Section 3.9, Hydrology and Water Quality for further discussion

**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
	CO-29	Discourage any nonagricultural land use in unincorporated areas with moderate to very high ground water recharge capability which could allow the percolation of pollutants into the ground water table.	<b>Consistent:</b> The proposed project is consistent with this policy, as it does not lie within an area of primary aquifer recharge. Refer to Section 3.9, Hydrology and Water Quality for further discussion
	CO-33	Implement the “Memorandum of Understanding Regarding Urban Water Conservation in California” in those areas where the County provides water service. Encourage all urban water purveyors in Sacramento County to execute and implement the MOU.	<b>Consistent:</b> The proposed project acknowledges that SCWA would be the likely provider for the proposed SOIA Area. CEQA review for any future development would coordinate with the water agency and follow procedures as determined by the agency. Refer to Section 3.16, Public Utilities and Service Systems for further discussion
	CO-54	Direct development away from prime or statewide importance soils or otherwise provide for mitigation that slows the loss of additional farmland conversion to other uses.	<b>Inconsistent:</b> The proposed project could potentially result in conversion of prime or statewide farmland. Refer to Section 3.2, Agricultural Resources for further discussion.
	CO-55	Direct development away from prime or statewide importance soils or otherwise provide for mitigation that slows the loss of additional farmland conversion to other uses. Projects resulting in the conversion of more than fifty (50) acres of prime or statewide in importance farmland shall be deemed to have a significant environmental effect, as defined by CEQA.	<b>Consistent:</b> The proposed project acknowledges that future urbanization may result in conversion of agricultural lands and constitutes a significant impact. Refer to Section 3.2, Agricultural Resources for further discussion.
	CO-60	Marshland and riparian areas of special significance shall be designated as natural preserves on the General Plan.	<b>Consistent:</b> The proposed SOIA Area is not identified as marshland or natural preserve on the County General Plan. Future development would address project specific impacts on biological resources and implement mitigation measures pursuant to CEQA.
	CO-63	Community Plans and specific plans shall include a complete inventory of seasonal and permanent marshland, riparian habitat, and riparian woodland.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development would address project specific impacts on biological resources. Refer to Section 3.4, Biological Resources for further discussion.

**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
	CO-66	Encroachments within the designated floodway of Sacramento waterways shall be consistent with policies to protect marsh and riparian areas.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development would address project specific impacts on marsh and riparian areas within waterways. Refer to Section 3.4, Biological Resources for further discussion.
	CO-69	Review projects for potential to restore marsh/riparian woodlands, considering effects on vernal pools, ground water, flooding, and proposed fill or removal of marsh and riparian habitat.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development would address project specific impacts on biological resources. Refer to Section 3.4, Biological Resources for further discussion.
	CO-70	Public or private projects involving filling or removal of marsh/riparian habitat shall be mitigated outside of natural preserves where onsite mitigation is not desirable or appropriate shall be mitigated through the purchase of mitigation credits for restored wetlands/riparian areas at no net loss.	<b>Consistent:</b> Future development would be subject to CEQA review and address project specific impacts on wetlands. Refer to Section 3.4, Biological Resources for further discussion.
	CO-82	Establish criteria and guidelines addressing the need for siting and management of natural preserves. At a minimum, the following should be considered: <ul style="list-style-type: none"> <li>• Resource(s) to be lost, restored and/or replaced, functional values,</li> <li>• Mitigation alternatives, including mitigation banks.</li> </ul>	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development would address project specific impacts on biological resources and implement mitigation measures pursuant to CEQA. Refer to Section 3.4, Biological Resources for further discussion.
	CO-102	The County will provide information to applicants with projects in potential wetland areas and provide coordination assistance with the Army Corps of Engineers in order to facilitate the development review and Section 404 permit review processes.	<b>Consistent:</b> Based on National Wetlands Inventory Maps, wetlands are identified in the proposed SOIA Area. The proposed project is consistent with this policy and acknowledges that future development would address project specific impacts on wetlands. Refer to Section 3.4, Biological Resources for further discussion.

**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
	CO-103	Allow no fill in the 100-year floodplain as delineated by currently effective FEMA Flood Insurance Rate Maps or subsequent comprehensive drainage plans adopted by the County unless the fill would cause no increase in flood surface elevation; in the absence of a floodway master plan the resulting floodplain would not be less than 600 feet in width or actual width of the floodplain, whichever is less, except at road crossings; depth of fill would not exceed two feet, except as may be specified for drainage swales in a comprehensive drainage plan; the proposed fill area is not necessary to serve as a detention basin for stormwater runoff; and no wetlands as defined by the U.S. Army Corps of Engineers exist within the proposed fill area.	<b>Consistent:</b> Approximately 13 percent of the SOIA Area lies within FEMA 100-year floodplain. Future development of the SOIA Area would be subject to CEQA to ensure that impacts due to flooding are not significant.
	CO-147	Identify suitable habitat for threatened and endangered species through the Community and Specific Plan process.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development would address project specific impacts on sensitive species pursuant to CEQA. Refer to Section 3.4, Biological Resources for further discussion.
	CO-148	Habitat conservation plans shall be adopted by the county for any listed species that are year-round inhabitants of the county, are subject to significant cumulative impacts from development, and are not otherwise adequately protected by designated systems of riparian corridors, vernal pool and wetland preserves and mitigation banks, or other nature preserves or wildlife refuges.	<b>Consistent:</b> The proposed project is consistent with this policy and future developments would comply with the South Sacramento Habitat Conservation Plan (SSHCP), once adopted, or other applicable documentation as feasible. Please note that the South Sacramento Habitat Conservation Plan (SSHCP) is in the process of development and environmental review and has not been adopted as of this writing.
	CO-156	Refer projects with identified archeological and cultural resources to the Cultural Resources Committee to determine significance of resource and recommend appropriate means of protection and mitigation. The	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development activities would implement procedures to protect archaeological and cultural resources

**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		Committee shall coordinate with the Native American Heritage Commission in developing recommendations.	pursuant to CEQA. Refer to Section 3.5, Cultural Resources for further discussion.
	CO-157	Significant archaeological, prehistoric, or historic sites shall be protected as open space for potential future excavation.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development activities would implement procedures to protect archaeological and cultural resources pursuant to CEQA. Refer to Section 3.5, Cultural Resources for further discussion.
	CO-158	Native American burial sites encountered during preapproved survey or during construction shall, whenever possible, remain in situ. Excavation and reburial shall occur when in situ preservation is not possible or when the archaeological significance of the site merits excavation and recording procedure. Onsite reinterment shall have priority. The project developer shall provide the burden of proof that off site reinterment is the only feasible alternative. Reinterment shall be the responsibility of local tribal representatives.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development activities would implement procedures to protect native burial sites pursuant to CEQA. Refer to Section 3.5, Cultural Resources for further discussion.
	CO-161	As a condition of approval of discretionary permits, a procedure shall be included to cover the potential discovery of archaeological resources during development or construction.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development activities would implement procedures to protect archaeological and cultural resources pursuant to CEQA. Refer to Section 3.5, Cultural Resources for further discussion.
	CO-162	As a condition of approval for discretionary projects which are in areas of cultural resource sensitivity, the following procedure shall be included to cover the potential discovery of archeological resource during development or construction: Should any cultural resources, such as structural features, unusual	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development activities would implement procedures to protect archaeological and cultural resources pursuant to CEQA. Refer to Section 3.5, Cultural Resources for further discussion.

**Table 3.10-3 (cont.): Sacramento County General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		<p>amounts of bone or shell, artifacts, human remains, or architectural remains be encountered during any development activities, work shall be suspended and the Sacramento County Department of Environmental Review and Assessment shall be immediately notified.</p> <p>At that time, the Department of Environmental Review and Assessment will coordinate any necessary investigation of the site with appropriate specialists, as needed. The project proponent shall be required to implement any mitigation deemed necessary for the protection of the cultural resources. In addition, pursuant to Section 5097.98 of the State Public Resources Code and Section 7050.5 of the State Health and Safety Code, in the event of the discovery of human remains, all work is to stop and the County Coroner shall be immediately notified. If the remains are determined to be Native American, guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains.</p>	

Source: Sacramento County General Plan, 1993.

**Elk Grove General Plan**

The City’s General Plan designates portions of the proposed SOIA Area as Urban Study Areas (refer to Figure LU-2 of the Elk Grove General Plan). The Urban Study Area designation envisions those areas in which future growth, to some extent, could occur. The General Plan does not identify a formal land use plan for these areas but lays out policies to guide the study of future development in cooperation with the public and other agencies and parties. No specific land use designation or pre-zoning are proposed or required at this point. No pre-zoning is associated with this proposed SOI Amendment. Pre-zoning is required prior to annexation of the area. There are no changes proposed to existing land uses for the SOI Area. Land uses will remain consistent with the County’s land use designations. Future studies would determine the extent to which anticipated future growth should

occur and in what form growth should be permitted, including any proposed land uses. Comprehensive land use planning for the area may commence after the SOI is amended. Current land uses are anticipated to remain the same until such land planning occurs, and a pre-zoning and annexation application may be approved.

The land use assumptions discussed in Section 2, Project Description indicate that future urbanization of the project area would result in urban land uses that do not conform to agricultural land use designations. Table 3.10-4 provides a General Plan consistency determination with the City of Elk Grove General Plan. Appendix D discusses other policies that were evaluated for consistency and would be more applicable once a definitive land use plan is proposed within the SOIA Area.

**Table 3.10-4: City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
Circulation	CI-1	Circulation planning for all modes of travel (vehicle, transit, bicycle, pedestrian, etc.) shall be coordinated with efforts to reduce air pollution.	<b>Consistent:</b> The proposed project is consistent with this policy as any future city development within the proposed SOIA Area would be subject to an independent CEQA review and analysis of alternative modes of transportation.
	CI-4	Specific Plans, Special Planning Areas, and development projects shall be designed to promote pedestrian movement through direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area.	<b>Consistent:</b> The proposed project is consistent with this policy as any future city development within the proposed SOIA Area would be subject to an independent CEQA review and address pedestrian connectivity.
	CI-8	The City shall encourage the extension of bus rapid transit and/or light rail service to the planned office and retail areas north of Kammerer Road and west of Hwy 99.	<b>Likely Consistent:</b> The proposed project is likely consistent with this policy as any future development within the proposed SOIA Area would be subject to an independent CEQA review and annexation process and address availability of public transit. Future projects would coordinate with City of Elk Grove transit agency (e-tran) as feasible.
	CI-13	The City shall require that all roadways and intersections in Elk Grove operate at a minimum Level of Service “D” at all times.	<b>Likely Consistent:</b> The proposed project is likely consistent with this policy. Any future development within the proposed SOIA Area would be subject to an independent CEQA review and will be required to prepare a traffic impact analysis that would address Level of Service.

Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis

Element	Policy		Consistency Determination
	No.	Text	
	CI-15	Development projects shall be required to provide funding or to construct roadway/intersection improvements to implement the City’s Circulation Master Plan. The payment of established traffic impact or similar fees shall be considered to provide compliance with the requirements of this policy with regard to those facilities included in the fee program, provided that the City finds that the fee adequately funds all required roadway and intersection improvements. If payment of established fees is used to provide compliance with this policy, the City may also require the payment of additional fees if necessary to cover the fair share cost of facilities not included in the fee program.	<b>Consistent:</b> The proposed project is consistent with this policy. Any future development within the proposed SOIA Area would be subject to an independent CEQA review and mitigate impacts through payment of impact fees in accordance with the City’s “impact fee ordinance.”
Conservation and Air Quality Element	CAQ-2	The loss of agricultural productivity on lands designated for urban uses within the city limits as of January 2004 is accepted as a consequence of the development of Elk Grove. As discussed in the Land Use Element, the City’s land use concept for the Planning Area outside the 2004 city limits anticipates the retention of significant areas of agricultural production outside the current city limits.	<b>Consistent:</b> The proposed project is consistent with this policy. The City of Elk Grove would begin comprehensive planning of the SOIA Area at an undetermined future time, and expansion of Sphere of Influence is a logical step towards that goal.
	CAQ-3	The City of Elk Grove considers the only mitigation for the loss of agricultural land to consist of the creation of new agricultural land in the Sacramento region equal in area, productivity, and other characteristics to the area that would be lost due to development. The protection of existing agricultural land through the purchase of fee title or easements is not considered by the City to provide mitigation, since programs of this type result in a net loss of farmland.	<b>Likely Consistent:</b> The proposed project is likely consistent with this policy, based upon implementation of Mitigation Measure AG-1. Refer to Section 3.2, Agricultural Resources for further discussion.



**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
	CAQ-9	Wetlands, vernal pools, marshland and riparian (streamside) areas are considered to be important resources. Impacts to these resources shall be avoided unless shown to be technically infeasible. The City shall seek to ensure that no net loss of wetland areas occurs, which may be accomplished by avoidance, re-vegetation and restoration onsite or creation of riparian habitat corridors.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development would prepare project specific biological resources analysis that would address project specific impacts and mitigation on wetlands and riparian areas. Refer to Section 3.4, Biological Resources for further discussion.
	CAQ-10	Consider the adoption of habitat conservation plans for rare, threatened, or endangered species.	<b>Consistent:</b> The proposed project is consistent with this policy and future developments would comply with the Draft South Sacramento Habitat Conservation Plan (SSHCP) as feasible. Please note that the South Sacramento Habitat Conservation Plan (SSHCP) is in the process of development and environmental review and has not been adopted as of this writing.
	CAQ-11	The City shall seek to preserve areas, where feasible, where special-status plant and animal species and critical habitat areas are known to be present or potentially occurring based on City biological resource mapping and data provided in the General Plan EIR or other technical material that may be adversely affected by public or private development projects. Where preservation is not possible, appropriate mitigation shall be included in the public or private project. "Special-status" species are generally defined as species considered to be rare, threatened, endangered, or otherwise protected under local, state, and/or federal policies, regulations or laws.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development would address project specific impacts on biological resources. Refer to Section 3.4, Biological Resources for further discussion.
	CAQ-12	The City shall seek to ensure that the quality of groundwater and surface water is protected to the extent possible.	<b>Consistent:</b> The proposed project is consistent with this policy. Future development would be subject to its own CEQA review and would address water quality. Refer to Section 3.9, Hydrology and Water Quality for further discussion.

**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
	CAQ-13	Implement the City’s NPDES permit through the review and approval of development projects and other activities regulated by the permit.	<b>Consistent:</b> The proposed project is consistent with this policy. Future development would be subject to its own CEQA review and project activities would implement the City’s NPDES permit when feasible. Refer to Section 3.9, Hydrology and Water Quality for further discussion.
	CAQ-14	The city shall seek to minimize the amount of impervious surfaces and directly connected impervious surfaces in areas of new development and redevelopment and use onsite infiltration of runoff in areas with appropriate soils where the infiltration of storm water would not pose a potential threat to groundwater quality.	<b>Consistent:</b> The proposed project is consistent with this policy. Future development would be subject to its own CEQA review and would address water quality. Refer to Section 3.9, Hydrology and Water Quality for further discussion.
	CAQ-20	Fill may not be placed in any 100-year floodplain as delineated by currently effective FEMA Flood Insurance Rate Maps or subsequent comprehensive drainage plans unless specifically approved by the City. No fill shall be permitted in wetland areas unless approved by the City and appropriate state and federal agencies.	<b>Consistent:</b> The proposed project is consistent with this policy. Future projects would be evaluated on a case-by-case basis pursuant to CEQA and address impacts within 100-year flood zone. Refer to Section 3.9, Hydrology and Water Quality for further discussion.
	CAQ-26	It is the policy of the City of Elk Grove to minimize air pollutant emissions from all City facilities and operations to the extent feasible and consistent with the City’s need to provide a high level of public service.	<b>Consistent:</b> The proposed project is consistent with this policy. Future projects would be evaluated on a case-by-case basis pursuant to CEQA and address air quality impacts. Refer to Section 3.3, Air Quality for further discussion.
	CAQ-30	All new development projects which have the potential to result in substantial air quality impacts shall incorporate design, construction, and/or operational features to result in a reduction in emissions equal to 15 percent compared to an “unmitigated baseline” project. An “unmitigated baseline project” is a development project which is built and/or operated without the implementation of trip-reduction, energy conservation, or	<b>Consistent:</b> The proposed project is consistent with this policy. Future projects would be evaluated on a case-by-case basis pursuant to CEQA and address air quality impacts. Refer to Section 3.3, Air Quality for further discussion.

**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		similar features, including any such features which may be required by the Zoning Code or other applicable codes.	
	CAQ-32	As part of the environmental review of projects, the City shall identify the air quality impacts of development proposals to avoid significant adverse impacts and require appropriate mitigation measures, potentially including—in the case of projects which may conflict with applicable air quality plans—emission reductions in addition to those required by Policy CAQ-30.	<b>Consistent:</b> The proposed project is consistent with this policy. Future projects would be evaluated on a case-by-case basis pursuant to CEQA and address air quality impacts. Refer to Section 3.3, Air Quality for further discussion.
Historic Resources Element	HR-1	Encourage the preservation and enhancement of existing historical and archaeological resources in the City.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development activities would implement mitigation measures to protect archaeological and cultural resources pursuant to CEQA. Refer to Section 3.5, Cultural Resources for further discussion.
	HR-3	Encourage restoration, renovation, and/or rehabilitation of all historic structures.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development activities would implement mitigation measures to protect historic resources pursuant to CEQA. Refer to Section 3.5, Cultural Resources for further discussion.
	HR-6	Protect and preserve prehistoric and historic archaeological resources throughout the City.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that future development activities would implement mitigation measures to protect archaeological and cultural resources pursuant to CEQA. Refer to Section 3.5, Cultural Resources for further discussion.
Housing	H-1	Maintain an adequate supply of appropriately zoned land with available or planned public services and infrastructure to accommodate the City’s projected housing needs for all income levels and for special needs groups. The acreage of	<b>Consistent:</b> The proposed project is consistent with this policy. The City of Elk Grove would begin comprehensive planning of the SOIA Area at an undetermined future time and expansion of Sphere of Influence is a logical step towards that.

**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		appropriately zoned land needed to meet housing needs will be updated annually, based on construction of housing units (tallied by income group and special needs group) and loss of sites through rezoning, in accordance with Action 10	
	H-17	Review the Housing Element to determine the appropriateness of the document to current conditions.	<b>Consistent:</b> The City of Elk Grove would review its Housing Element pursuant to Government Code (Sections 65580-65590).
Land Use	LU-1	The City of Elk Grove recognizes the value of using the City’s land use authority to regulate the use of land within the city, the uses which can take place upon lands in Elk Grove, the arrangement of public and private buildings, and the design of public and private development in order to create an attractive, vibrant community which fulfills the goals expressed in this General Plan.	<b>Consistent:</b> The proposed project is consistent with this policy as it acknowledges that City of Elk Grove in collaboration with County of Sacramento may begin comprehensive land use planning at an undetermined time pursuant to approval of the SOIA.
	LU-2	The City’s Land Use Policy Map (figure LU-1) illustrates the planned land uses for lands within Elk Grove and the Planning Area outside the city limits. The following land use categories and definitions shall be used in the assignment of zoning categories and in the review of proposed projects. (Note: The “Former GP Designation” reflects the land use designation[s] from the previous General Plan which most closely correspond to the designations used in this General Plan. This is provided for informational purposes only.)	<b>Consistent:</b> The proposed SOIA Area lies within the City of Elk Grove’s planning area. City of Elk Grove in collaboration with County of Sacramento may begin comprehensive planning at an undetermined time pursuant to approval of the SOIA. Any land use designations would be assigned at that time and are anticipated to be consistent with the City’s General Plan.
	LU-3	The following table illustrates the Zoning Districts, which implement the land use categories shown on the Land Use Policy Map of this General Plan.	<b>Consistent:</b> City of Elk Grove in collaboration with County of Sacramento may begin comprehensive planning at an undetermined time pursuant to approval of the SOIA. Any rezoning designation consistent with the proposed land use designations would be assigned at that time.

**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination																																				
	No.	Text																																					
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Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis

Element	Policy		Consistency Determination
	No.	Text	
		Residential	
		Rural Agriculture	AR-10, AG-20
		General Agriculture	AG-20, AG-80
		Urban study area	AG zoning districts
		Private Streets	Any zoning district
		Transit Oriented Development (TOD)	Reference underlying land use designation for consistent Zoning Districts
		The "O" (Recreation) zone is a consistent zoning district in all land use categories.	
	LU-4	All land use approvals, including, but not limited to: <ul style="list-style-type: none"> <li>• Zoning,</li> <li>• Planning documents (such as Specific</li> <li>• Plans and Special Planning Areas),</li> <li>• Tentative Maps,</li> <li>• Conditional Use Permits,</li> <li>• Etc.,</li> </ul> shall be required to conform with the General Plan.	<b>Consistent:</b> City of Elk Grove in collaboration with County of Sacramento may begin comprehensive planning at an undetermined time pursuant to approval of the SOIA. Any proposed development would be required to demonstrate consistency with the General Plan.
	LU-10	The City should seek to designate sufficient land in all employment-generating categories to provide a minimum 1:1 correspondence between Elk Grove's working population and jobs in categories matching their employment level.	<b>Consistent:</b> The SOIA Area is envisioned to accommodate future growth and assist the City in achieving a jobs-to-housing balance.
	LU-12	The Land Use Policy Map for the Planning Area (Figure LU-2) provides conceptual land use policy for the area outside the current incorporated boundaries of Elk Grove. This policy is intended as a statement of the City's long-term vision for this area; these lands remain under the jurisdiction of Sacramento County. Except where	<b>Consistent:</b> No land use policies or designations are proposed in conjunction with the SOIA application. The SOIA Area conforms to Sacramento County General Plan land use designations.

**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		specifically indicated, the City’s land use policy for areas outside the city limits reflects the County of Sacramento’s land use policy as it existed on December 31, 2002.	
	LU-13	The City will work with the Sacramento Local Agency Formation Commission to establish and update a Sphere of Influence, which reflects the City’s near-term goals for potential additions to the corporate boundaries.	<b>Consistent:</b> The proposed SOIA is consistent, because the City of Elk Grove will coordinate with LAFCO consistent with Policy LU-13.
	LU-14	<p>The City shall apply the following policies to potential annexations: Annexations should conform to an orderly expansion of city boundaries within planned urban growth areas and provide for a contiguous development pattern.</p> <p>Annexations should include a comprehensive land use plan for the affected territory, including Pre-zoning and a plan for infrastructure financing and phasing.</p> <p>Annexations should:</p> <ul style="list-style-type: none"> <li>• Constitute fiscally sound additions to the existing City.</li> <li>• Be consistent with State law and Local Agency Formation Commission policies, standards and criteria</li> <li>• Preserve neighborhood identities.</li> <li>• Ensure the provision of adequate municipal services.</li> <li>• Be consistent with General Plan and Community Plan land use policies.</li> <li>• Incorporate Smart Growth criteria for sustainable economic growth while maintaining environmental integrity, and providing for social equity.</li> <li>• Promote fiscally sound, efficient service boundaries.</li> </ul>	<b>Consistent:</b> Future development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. Please note that all these activities will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.

**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
	LU-15	The City shall encourage annexations initiated by landowner/residents, which are consistent with the City’s policies.	<b>Consistent.</b> Multiple landowners are in support of the proposed SOIA and have requested to be included within the City’s SOI.
	LU-16	<p>The areas designated in the Planning Area as “Urban Study Areas” are envisioned as areas in which urbanization to some extent could occur, generally in compliance with the following criteria:</p> <ul style="list-style-type: none"> <li>• Development should be limited to areas outside of the 100-year flood-plain.</li> <li>• Development should take place in compliance with the goals and policies of this General Plan.</li> <li>• Any study of potential land uses in these areas should be accomplished in cooperation with the County of Sacramento, the Sacramento Local Agency Formation Commission, and other agencies and parties with ownership or jurisdiction of lands in and near the study area.</li> <li>• Any study of land uses in these areas should be accompanied by an environmental evaluation of the potential impacts of development.</li> <li>• Prior to the completion of land use studies, the City’s policy is that County of Sacramento land use designations in effect as of December 31, 2002, are retained.</li> </ul>	<b>Consistent:</b> No city land use designations are proposed in conjunction with the SOIA application. The SOIA Area conforms to Sacramento County General Plan land use designations. Future city development of the SOIA Area would require annexation by the City of Elk Grove and includes comprehensive land use planning. Please note that all these activities will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.
	LU-17	Implement a comprehensive and city-wide strategy for the preservation of open space, habitat and agriculture, both inside and outside the City’s existing city limits.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. Please note that all these activities will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.



**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
Noise	NO-1	New development of the uses listed in Table NO-C shall conform with the noise levels contained in that Table. All indoor and outdoor areas shall be located, constructed, and/or shielded from noise sources in order to achieve compliance with the City’s noise standards.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. Please note that all these activities will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.
	NO-3	Noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table NO-A as measured immediately within the property line of lands designated for noise-sensitive uses.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. Please note that all these activities will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.
	NO-5	Noise created by the construction of new transportation noise sources (such as new roadways or new light rail service) shall be mitigated so as not to exceed the levels specified in Table NO-C at outdoor activity areas or interior spaces of existing noise-sensitive land uses. Please see Policy NO-6 for discussion of improvements to existing roadways.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. Please note that all these activities will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.
Parks Trail and Open Space	PTO-18	To the extent possible, retain natural drainage courses in all cases where preservation of natural drainage is physically feasible and consistent with the need to provide flood protection.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. Please note that all these activities will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.
Public Facilities and Finance	PF-1	Except when prohibited by state law, the City shall require that sufficient capacity in all public services and facilities will be available on time to maintain desired service levels and avoid capacity shortages, traffic congestion, or other negative effects on safety and quality of life.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. The City of Elk Grove has completed a Municipal Services Review to identify likely service providers for the proposed SOIA Area.

**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
	PF-2	The City shall coordinate with outside service agencies—including water and sewer providers, the Elk Grove Community Services District, and the Elk Grove Unified School District—during the review of plans and development projects.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. The City of Elk Grove has completed a Municipal Services Review to identify likely service providers for the proposed SOIA Area. Please note that all future development will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.
	PF-3	Water supply and delivery systems shall be available in time to meet the demand created by new development, or shall be assured through the use of bonds or other sureties to the City’s satisfaction.	<b>Consistent:</b> The Municipal Services Review identifies SCWA as the likely municipal water service provider for future growth in the SOIA Area. SCWA would need to plan for and extend infrastructure and services to fully serve the entire SOIA Area.
	PF-8	Sewage conveyance and treatment capacity shall be available in time to meet the demand created by new development, or shall be assured through the use of bonds or other sureties to the City’s satisfaction.	<b>Consistent:</b> The Municipal Services Review identifies the Sacramento Area Sewer District (SASD) and the Sacramento Regional County Sanitation District (SRCSD) as the most likely regional wastewater collection and treatment service providers for residents in the SOIA Area. The City of Elk Grove would need to annex the SOI Amendment area to the SASD and SRCSD service area in order to receive regional wastewater treatment services. Please note that all these activities will be subject to CEQA to ensure that growth occurs in a logical manner and does not result in significant impacts.
	PF-15	The City shall cooperate with the County of Sacramento in the planning and implementation of future library facilities and facility expansions in Elk Grove.	<b>Consistent:</b> Sacramento Public Library Authority (SPL) would provide service to the SOIA Area. Refer to Section 3.14, Public Services for further information.
	PF-19	Public facilities should be phased in a logical manner which avoids “leapfrog” development and	<b>Consistent:</b> The proposed project is consistent with this policy. The City of Elk Grove would begin

**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		encourages the orderly development of roadways, water and sewer, and other public facilities. The City shall not provide public financing or assistance for projects that do not comply with the planned phasing of public facilities. Interim facilities may be used only if specifically approved by the City Council.	comprehensive planning of the SOIA Area at an undetermined future time.
	PF-21	New development shall fund its fair share portion of its impacts to all public facilities and infrastructure as provided for in state law.	<b>Consistent:</b> The proposed project is consistent with this policy. Any future city development within the proposed SOIA Area would be subject to an independent CEQA review and mitigate impacts through payment of impact fees in accordance with City’s impact fee ordinance.
	PF-23	The City will coordinate with independent public service providers, including schools, parks and recreation, reclamation, water, transit, electric and other service districts, in developing financial and service planning strategies.	<b>Consistent:</b> The proposed project is consistent with this policy. The City of Elk Grove may comprehensively plan for urbanization of the SOIA Area at an undetermined future time and coordinate with appropriate agencies for provision of services.
Safety	SA-1	The City will seek to maintain acceptable levels of risk of injury, death, and property damage resulting from reasonably foreseeable safety hazards in Elk Grove.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. Please note that all future development will be subject to CEQA to address safety concerns and ensure that growth does not result in significant impacts.
	SA-5	The City will cooperate with other local, regional, state, and federal agencies, and with rail carriers in an effort to secure the safety of all residents and businesses in Elk Grove.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and will be subject to CEQA to ensure that projects comply with applicable agencies’ regulations.
	SA-11	Support continued coordination with the State Office of Emergency Services, the State Department of Toxic Substances Control, the State Highway Patrol, the Sacramento County Department of Environmental Health Services, the Elk Grove CSD Fire District, the	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. Please note that all future development will be subject to CEQA to ensure that projects comply with applicable regulatory measures.

Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis

Element	Policy		Consistency Determination
	No.	Text	
		Sheriff's Department, and other appropriate agencies in hazardous materials route planning and incident response.	
	SA-13	The City shall require that all new projects not result in new or increased flooding impacts on adjoining parcels on upstream and downstream areas.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and subject to CEQA review. This would ensure that projects would not result in significant impacts. Refer to Section 3.9, Hydrology and Water Quality for further discussion.
	SA-14	The City shall give priority to the designation of appropriate land uses in areas subject to flooding to reduce risks to life and property. Construction of new flood control projects shall have a lower priority, unless land use controls (such as limiting new development in flood-prone areas) is not sufficient to reduce hazards to life and property to acceptable levels.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning. Please note that all future development will be subject to CEQA to ensure that impacts are not significant.
	SA-15	Development shall not be permitted on land subject to flooding during a 100-year event, based on the most recent floodplain mapping prepared by the Federal Emergency Management Agency (FEMA) or updated mapping acceptable to the City of Elk Grove. Potential development in areas subject to flooding may be clustered onto portions of a site which are not subject to flooding, consistent with other policies of this General Plan.	<b>Consistent:</b> Approximately 13 percent of the SOIA Area lies within FEMA 100-year floodplain. Future development of the SOIA Area would be subject to CEQA to ensure that impacts due to flooding are not significant.
	SA-23	The City shall require all new urban development projects to incorporate runoff control measures to minimize peak flows of runoff and/or assist in financing or otherwise implementing Comprehensive Drainage Plans.	<b>Consistent:</b> Future city development of the SOIA Area would be subject to CEQA review and address impacts from runoff. Refer to Section 3.9, Hydrology and Water Quality for further discussion.
	SA-25	The City supports efforts by Federal, State, and other local jurisdictions to investigate local seismic and geological hazards and support those	<b>Consistent:</b> Future city development of the SOIA Area would be subject to CEQA review and comply with applicable seismic code, as required

**Table 3.10-4 (cont.): City of Elk Grove General Plan Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		programs that effectively mitigate these hazards.	by the recommended mitigation measures. Refer to Section 3.6, Geology and Soils for further discussion.
	SA-26	The City shall seek to ensure that new structures are protected from damage caused by geologic and/or soil conditions.	<b>Consistent:</b> Future city development of the SOIA Area would be subject to CEQA review and address impacts from geologic and seismic conditions, as required by the recommended mitigation measures. Refer to Section 3.6, Geology and Soils for further discussion.
	SA-32	Cooperate with the Elk Grove Community Services District (EGCSD) Fire Department to reduce fire hazards, assist in fire suppression, and promote fire safety in Elk Grove.	<b>Consistent:</b> The proposed project is consistent with this policy, as any future city development within the proposed SOIA Area would be subject to an independent CEQA review and annexation process and would be served by Elk Grove Community Services District (EGCSD) Fire Department.
Source: City of Elk Grove General Plan, 2003.			

**Sacramento LAFCO Policies, Standards, and Procedures Guidelines**

As outlined in the Elk Grove’s SOIA Application (City of Elk Grove 2008 Application, rev. 2010), and shown in the analysis below, the proposed SOIA complies with LAFCo’s specific policies and standards for amendments to an SOI with the exception of Policy IV.E.1 regarding the conversion of farmland to urban uses. As discussed in Section 3.2, Agricultural Resources, since approval of an SOIA by LAFCo indicates that the Commission has designated the revised SOIA Area for future urbanization, impacts related to permanent conversion of agricultural uses to urban uses would be potentially significant. Implementation of Mitigation Measure AG-1 would reduce the conversion of farmland, but impacts would remain significant and unavoidable.

As listed in Chapter 4, General Standards of the LAFCo Policies, Standards, and Procedures Manual, LAFCo will approve SOIA requests only if the proposal is consistent with the General Plan and applicable Specific Plans of the applicable planning jurisdiction. In this case, the applicable planning jurisdiction is the City of Elk Grove.

California Government Code Section 56668 sets forth criteria for evaluation of annexation projects. This statute establishes factors that LAFCo agencies must use in reviewing annexation proposals. Any future city urban development would require annexation by the City of Elk Grove and would be

subject to this statute and evaluated for consistency at that time. Table 3.10-5 provide consistency determination with the LAFCo policies.

**Table 3.10-5: Sacramento LAFCo Policy Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
III. LAFCo General Policies	1	The LAFCo will encourage participation in its decision-making process. LAFCo will contact community members through community councils, give published notice, and, where LAFCo determines appropriate, give mailed notice to the owners of property within 500 feet of a project site.	<b>Consistent:</b> The proposed project is consistent with this policy, as the Draft EIR will be circulated for public review to interested public and private agencies pursuant to CEQA.
	2	The LAFCo will encourage communication on actions among the County, cities, and special districts.	<b>Consistent:</b> The proposed project is consistent with this policy. It acknowledges that future urbanization may occur under a draft Memorandum of Understanding between the County of Sacramento and the City of Elk Grove.
	4	The CEQA requires that LAFCo assess the environmental consequences of its actions and decisions, and take actions to avoid or minimize a project’s adverse environmental impacts, if feasible, or approve a project despite significant effects because it finds overriding considerations exist. To comply with CEQA, the LAFCo will take one or more of the following actions: a. At its discretion, approve a project without changes if environmental impacts are insignificant; b. Require an applicant to modify a project; c. Establish mitigating measures as a condition of its approval of the proposal; d. Deny the proposal because of unacceptable adverse environmental impacts; e. Approve the project despite its significant effects by making findings of overriding concern.	<b>Consistent:</b> The Draft EIR is prepared pursuant to CEQA to analyze environmental impacts associated with the proposed project. Any future city development would require annexation by the City of Elk Grove and would be subject to LAFCo policies for annexation. All these regulatory procedures would ensure consistency with this policy.
	7	LAFCo will favorably consider those applications which improve the balance between jobs and housing.	<b>Consistent:</b> The SOIA Area is envisioned to accommodate future growth and assist City in achieving a job housing balance.

**Table 3.10-5 (cont.): Sacramento LAFCo Policy Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
	B.3	For purposes of this standard, the proposal shall be deemed consistent if the proposed use is consistent with the applicable General Plan designation and text, the applicable General Plan is legally adequate and internally consistent and the anticipated types of services to be provided are appropriate to the land use designated for the area.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning and rezoning consistent with the City’s General Plan.
	A.3	The LAFCo will require that any agency malting a proposal for action through LAFCo must have an updated Master Service Element of its Spheres of Influence Plan. The LAFCo will approve a proposal only if the proposed service provider is the most efficient provider of services with an acceptable cost, as demonstrated in the provider’s Master Service Element.	<b>Consistent:</b> The proposed project is consistent with this policy. The City of Elk Grove may begin comprehensive planning of the SOIA Area at an undetermined future time and expansion of the Sphere of Influence is a reasonable policy decision towards that goal. The City has prepared a Municipal Services Review that identifies logical service providers for the SOIA Area.
	B.1	LAFCo will approve changes of organization or reorganization only if the proposal is consistent with the General Plan and applicable Specific Plans of the applicable planning jurisdiction.	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning and consistency with the City’s General Plan.
	B.2	For purposes of the above policy, the applicable planning jurisdiction is as follows: a. For annexations to a city, the applicable jurisdiction is the city to which annexation is proposed; b. For applications for annexation to or detachment from a district all of whose territory lies within an adopted Sphere of Influence of a city, the General Plans of the city; c. For an application for annexation to a special district for lands outside an adopted city Sphere of Influence, the Sacramento County General Plan. d. For an application for annexation or detachment from a district whose territory lies in both the city and the unincorporated area of the county, the General Plan of	<b>Consistent:</b> Future city development of the SOIA Area would require annexation by the City of Elk Grove and include comprehensive land use planning and rezoning consistent with the City’s General Plan.

Table 3.10-5 (cont.): Sacramento LAFCo Policy Consistency Analysis

Element	Policy		Consistency Determination
	No.	Text	
		the city unless the project lies outside of the city’s Sphere of Influence; and e. For applications for incorporations, this standard is inapplicable.	
	C.1	LAFCo will not accept as complete any application for a proposal unless it includes boundaries that are definite, certain, and fully described.	<b>Consistent:</b> The proposed project is consistent with this policy and includes areas south of Bilby Road, Kammerer Road, and Grant Line Road, extending south to Eschinger Road and Cosumnes River; east towards Cosumnes River and just past Freeman Road; and west towards I-5 and the Union Pacific Railroad tracks.
	C.3	The LAFCo will not approve applications with boundaries which: a. neighborhoods or divide an existing identifiable community, commercial district, or other areas having a social or economic identity; b. Result in islands, corridors or peninsulas of incorporated or unincorporated territory or otherwise cause or further the distortion of existing boundaries; c. Are drawn for the exclusive purpose of encompassing revenue-producing territories; d. Create areas for which it is difficult to provide services; or e. Split parcels.	<b>Consistent:</b> The proposed project is consistent with this policy. The proposed SOIA boundaries extend the existing City’s SOI boundary’s further east, west, and south and would not divide or create islands.
	D.1	LAFCo will approve a proposal for a change of organization or reorganization only if the Commission finds that the proposal is revenue neutral at the time the proposal comes before the Commission. A proposal is deemed revenue neutral if: a. The proposal ensures that the amount of revenue transferred from an agency or agencies currently providing services in the subject territory to the proposed service-providing agency equals	<b>Consistent:</b> Future city developments would be subject to CEQA and would be required to pay their fair share of development fee in accordance with City’s impact fee ordinance.



**Table 3.10-5 (cont.): Sacramento LAFCo Policy Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		<p>the expense which the current service provider bears in providing the services to be transferred.</p> <p>b. In the event the expense to the current service provider exceeds the amount or revenue transferred, the current service provider and the new service providing agency agree to revenue transfer provisions to compensate for the imbalance. Such provisions may include, but are not limited to tax-sharing, lump-sum payments and payments over a fixed period of time.</p> <p>c. Where revenue neutrality is not possible because of the requirements of state law or these standards, LAFCo shall impose all feasible conditions available to reduce any revenue in balance or it may deny the proposal.</p> <p>d. property tax exchange agreement has been reached pursuant to the Revenue and Taxation Code by the agencies participating in the change of organization or reorganization as required by law.</p> <p>e. Appendix E of the LAFCo's policies and standards provides additional information related to the financial guidelines for evaluating incorporation proposals.</p>	
	E.1	<p>LAFCo will approve a change of organization or reorganization which will result in the conversion of prime agricultural land in open space use to other uses only if the Commission finds that the proposal will lead to the planned, orderly and efficient development of an area. For purposes of this standard, a proposal leads to the planned, orderly and efficient development of an area only if all of the following criteria are met:</p> <p>a. The land subject to the change of organization or reorganization is</p>	<p><b>Inconsistent:</b> The proposed project is inconsistent with this policy, as it could result in the loss of prime farmlands. Refer to Section 3.2, Agricultural Resources for further discussion.</p>

**Table 3.10-5 (cont.): Sacramento LAFCo Policy Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		<p>contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development.</p> <p>b. The proposed development of the subject lands is consistent with the Spheres of Influence Plan, including the Master Services Element of the affected agency or agencies.</p> <p>c. Development of all or a substantial portion of the subject land is likely to occur within five years. In the case of very large developments, annexation should be phased whenever feasible. If the Commission finds phasing infeasible for the specific reasons, it may approve annexation if all or a substantial portion of the subject land is likely to develop within a reasonable period of time.</p> <p>d. Insufficient vacant non-prime lands exists within the applicable Spheres of Influence that are planned, accessible, and developable for the same general type of use.</p> <p>e. The proposal will have no significant adverse effect on the physical and economic integrity of other agricultural lands. In making this determination, LAFCo will consider the following factors:</p> <ul style="list-style-type: none"> <li>• The agricultural significance of the subject and adjacent areas relative to other agricultural lands in the region.</li> <li>• The use of the subject and the adjacent areas.</li> <li>• Whether public facilities related to the proposal would be sized or situated so as to facilitate the conversion of adjacent or nearby agricultural land, or will be extended</li> </ul>	

**Table 3.10-5 (cont.): Sacramento LAFCo Policy Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
		<p>through or adjacent to, any other agricultural lands which lie between the project site and existing facilities.</p> <ul style="list-style-type: none"> <li>• Whether natural or man-made barriers serve to buffer adjacent or nearby agricultural land from the effects of the proposed development.</li> <li>• Applicable provisions of the General Plan open space and land use elements, applicable growth-management policies, or other statutory provisions designed to protect agriculture.</li> </ul>	
	F.1	<p>In general, LAFCo will function as a Lead Agency in situations where:</p> <ol style="list-style-type: none"> <li>a. LAFCo is the first agency in time to act;</li> <li>b. The primary decision relates to a change of organization or reorganization or sphere of influence;</li> <li>c. The applicant agency is unable to act as the Lead Agency; or</li> <li>d. There are no underlying land use approvals involved.</li> </ol>	<p><b>Consistent:</b> The proposed project is consistent with this policy as Sacramento LAFCo is the lead agency for the proposed project.</p>
	F.2	<p>The Executive Officer shall have the authority to prepare or cause to be prepared the appropriate environmental documentation. LAFCo will not act upon any proposal for a change of organization until environmental documentation has been completed which adequately addresses the requirements of CEQA. The Executive Officer of LAFCo shall serve as LAFCo's Environmental Coordinator and shall make an environmental determination per the requirements of CEQA.</p>	<p><b>Consistent:</b> The Draft EIR is prepared in compliance with CEQA regulatory requirements. LAFCo is the lead agency and has the authority to approve, modify and approve, or deny the project.</p>

**Table 3.10-5 (cont.): Sacramento LAFCo Policy Consistency Analysis**

Element	Policy		Consistency Determination
	No.	Text	
	F.5	An EIR completed on a project subject LAFCo review shall contain a discussion of the following topics: a. County-wide or cumulative impacts which concern LAFCo. b. Where the EIR identifies significant effects, a description of the range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project. The range of alternatives to be considered shall include, at a minimum, the “no-action” alternative, alternative boundary locations, and a discussion of using other agencies to provide the facility or service proposed to be provided as a result of the proposed change of organization or reorganization.	<b>Consistent:</b> The proposed project is consistent with this policy. Refer to Section 4, Cumulative Effects and Section 5.0, Alternatives Analysis for further discussion.
Source: Sacramento LAFCo Policy, Standards and Procedures Manual.			

*County of Sacramento Elk Grove Community Plan and Laguna Community Plan*

The Elk Grove and Laguna Community plans were prepared by Sacramento County and, therefore, are consistent with the Sacramento County General Plan, and since the proposed project would maintain Sacramento County General Plan Land Use designations, the project would not conflict with applicable policies in either Community Plan. The Elk Grove General Plan Draft EIR considered the Elk Grove and Laguna Community plans in the land use and plan consistency analysis (Elk Grove 2003). The Elk Grove General Plan Draft EIR did not find that the Elk Grove General Plan or its planning area (in which the SOIA Area is located) was inconsistent with the Elk Grove or Laguna Community plans. Accordingly, the proposed SOIA would not be inconsistent with the Elk Grove or Laguna Community plans.

**Level of Significance Before Mitigation**

Potentially significant impact.

**Mitigation Measures**

Implement Mitigation Measure AG-1.

***Level of Significance After Mitigation***

Significant and unavoidable impact.

***Conservation Plan Consistency***

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**Impact LU-3:**            **The project would not conflict with any applicable habitat conservation plan or natural community conservation plan.**

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***Impact Analysis***

The Stone Lakes National Wildlife Refuge Comprehensive Conservation Plan, Sacramento Delta Land Use and Resource Plan, and Draft South Sacramento Habitat Conservation Plan include areas within or adjacent to the proposed SOIA Area, as shown in Exhibit 3.10-3. Each plan is discussed below.

***Stone Lakes National Wildlife Refuge***

The proposed SOIA Area’s western boundary is located directly adjacent to a portion of the Refuge’s eastern boundary. The proposed SOIA boundaries have been delineated to avoid inclusion of areas that are a part of the Stone Lakes Natural Wildlife Refuge. As shown in Exhibit 3.10-2, the SOIA Area would not encroach onto the refuge boundaries. Moreover, the proposed project would not violate any of the Comprehensive Conservation Plan policies identified above. As such, the proposed project would not conflict with the refuge’s Comprehensive Conservation Plan.

***Sacramento Delta Land Use and Resource Plan***

The Sacramento Delta Land Use and Resource Plan protects the Sacramento Delta’s Primary Zone and expresses concern regarding the potential for urbanization and projects in the Secondary Zone to impact the Primary Zone. The eastern boundary of the Delta’s Primary and Secondary Zones generally follow I-5 near the proposed SOIA Area. The SOIA Area is not located within the Primary or Secondary Zone of the Sacramento Delta. As such, the SOIA Area would not be in conflict with the Sacramento Delta Land Use and Resource Plan.

***South Sacramento Habitat Conservation Plan (Draft)***

The proposed SOIA Area is located completely within the South Sacramento Habitat Conservation Plan (SSHCP). The western and center portions of the SOIA Areas are located outside of the SSHCP’s designated Urban Development Area, while the eastern SOIA Area is located within the Urban Development Area. The proposed SOIA Area has been included and considered in the HCP as shown in Figure 4-1 of the HCP. As shown in Figure 4-7 of the HCP, the SOIA Area does not include any areas protected by easement, fee title, policy, or mitigation bank. However, because portions of the SOIA Area are located outside of the SSHCP’s designated Urban Development Area, the proposed project could potentially conflict with the South Sacramento HCP. Implementation of Mitigation Measure LU-3 would reduce potential impacts to special habitats and endangered species to a less than significant level.

In summary, the proposed SOIA, if approved, could result in future urbanization of the project site. Accordingly, this could result in potential conflicts with applicable habitat or natural community plans within the proposed SOIA Area. As discussed above, implementation of Mitigation Measure LU-3 would reduce such potential conflicts to a less than significant level.

***Level of Significance Before Mitigation***

Potentially significant impact.

***Mitigation Measures***

**MM LU-3** At the time of submittal of any application to annex territory within the Sphere of Influence Amendment (SOIA) Area, the City of Elk Grove shall either demonstrate participation in the South Sacramento County Habitat Conservation Plan or provide mitigation consistent with the requirements of state and federal regulatory authorities regarding impacts to special habitats and endangered species. If the proposed SOIA project is inconsistent with the South Sacramento County Habitat Conservation Plan, the City shall seek to have the Plan amended. The City shall continue to mitigate impacts on special habitats and endangered species in consultation with applicable federal and state agencies prior to adoption of the South Sacramento County Habitat Conservation Plan.

***Level of Significance After Mitigation***

Less than significant impact.

**Open Space Resources Conversion**

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**Impact LU-4: The project would convert open space resources to urban uses.**

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***Impact Analysis***

This impact will evaluate the potential for the proposed project to convert open space resources to urban uses.

The proposed SOIA would expand the City's SOI boundary to include open space resources including 78 acres of lands classified as natural preserve. The land use assumptions discussed in Section 2.0, Project Description, consider the SOIA Area to be potentially developed with urban uses that would result in the preservation of 987 acres of open space. However, the proposed project by itself precludes direct development proposals or proposed changes to General Plan land use designations or zoning classifications that would have the potential to convert open space resources; therefore, direct conversion of open space resources would not occur. Since approval of an SOIA by LAFCo indicates that the Commission has designated the revised SOIA Area for future urbanization, impacts related to permanent conversion of open space uses to urban uses would be potentially significant. Implementation of Mitigation Measure AG-1 would reduce the conversion of open space resources, but impacts would remain significant and unavoidable.

*Land Use*

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***Level of Significance Before Mitigation***

Potentially significant impact.

***Mitigation Measures***

Implement Mitigation Measure AG-1.

***Level of Significance After Mitigation***

Significant and unavoidable impact.