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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 LAFCo Policies, Standards, and Procedures Guidelines; 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; 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 (July 2010).

### **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 Cosumnes River floodplain, rural, residential, 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 influencing 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 Application 2008, rev. 2010). Table

**Land Use**

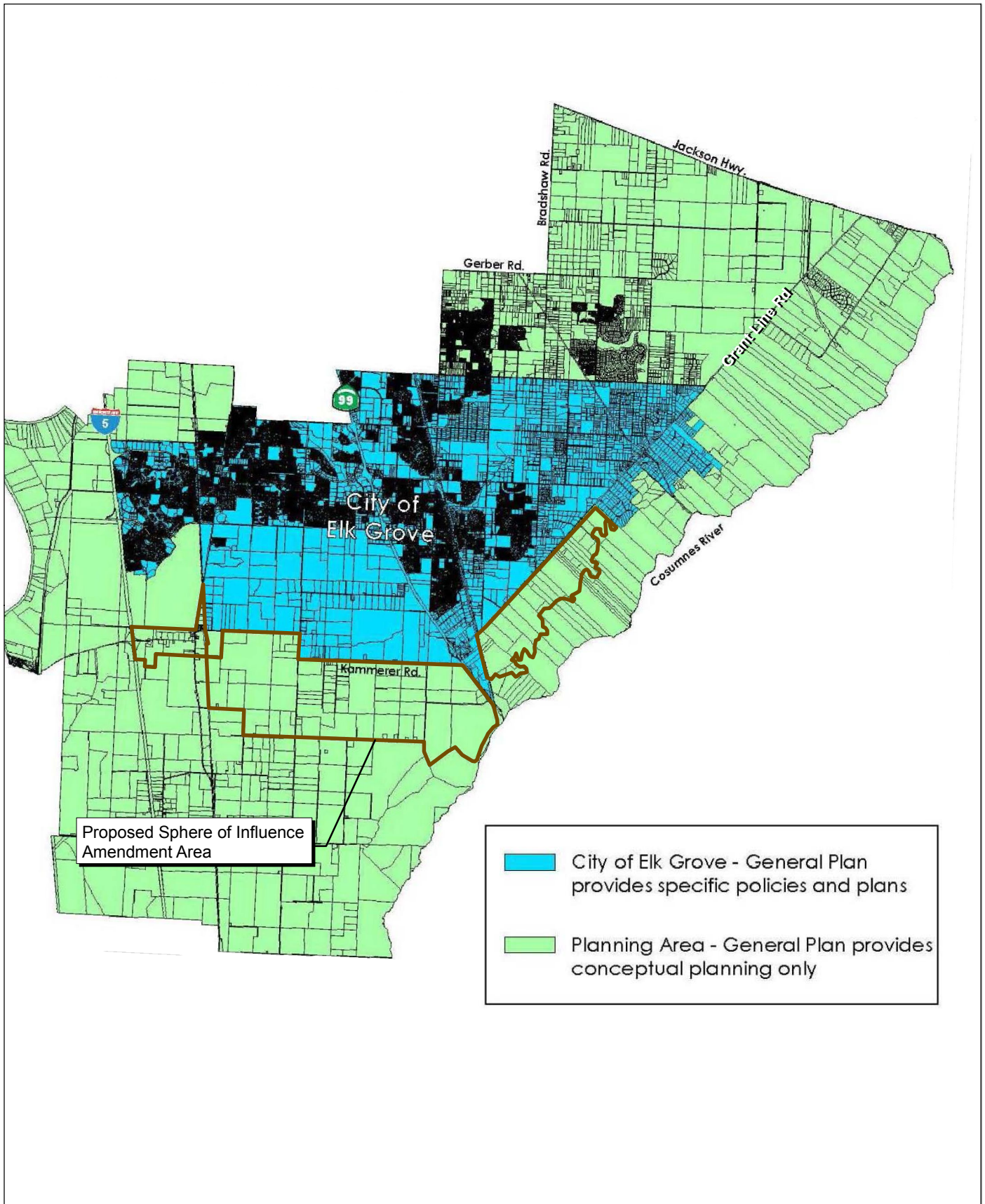
3.10-1 and Table 3.10-2 include the current Sacramento County land use and zoning designations within the SOIA Area.

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

Sacramento County Land Use Designation	Acreage within SOIA Area
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 Area
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.	



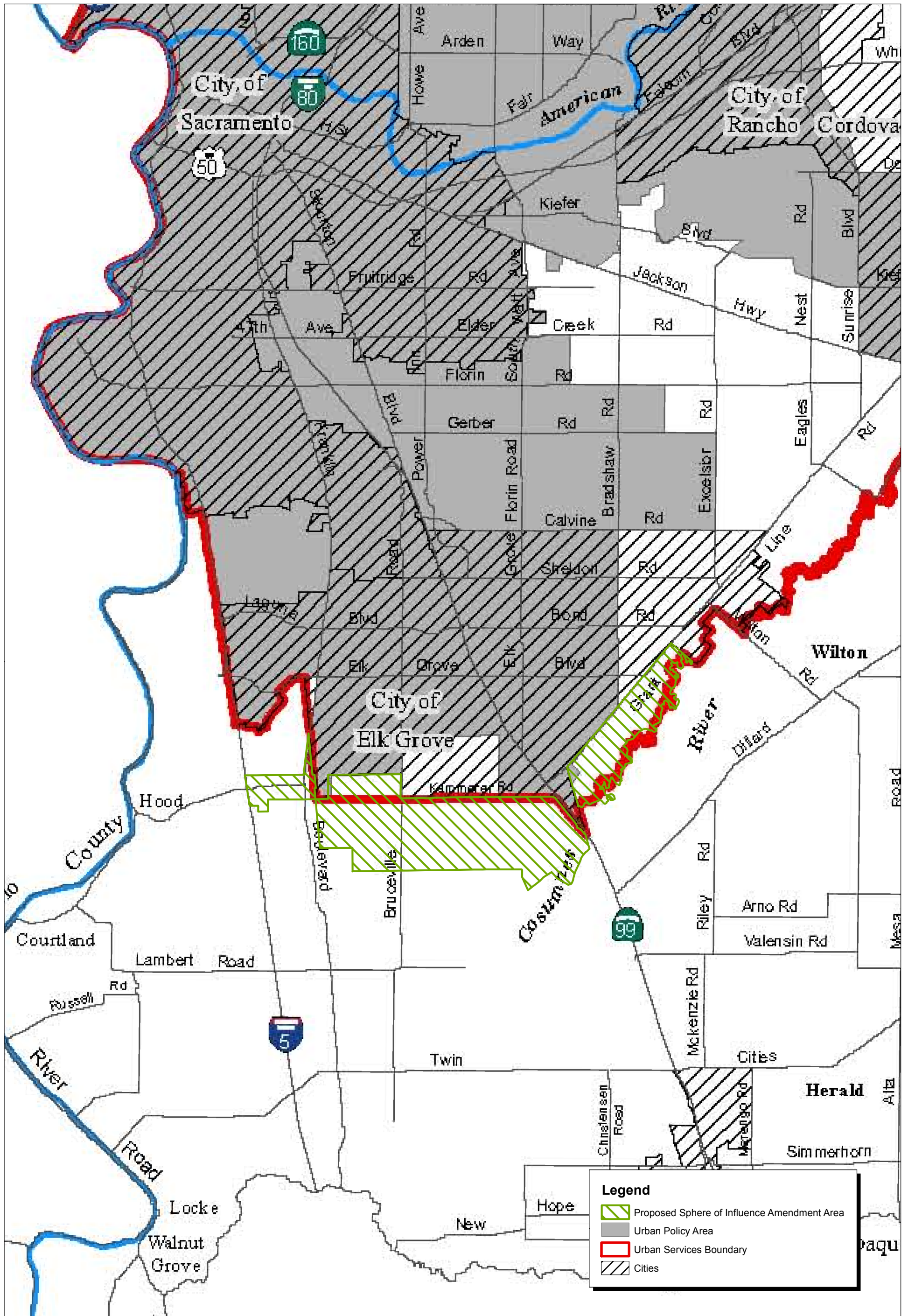
Source: City of Elk Grove.



## 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 Area'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 residential, agricultural uses occur in the western portion of the City, to the north of the SOIA Area 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 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 Area 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. Current land uses consist mostly of cattle rangeland.

## **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 (see Exhibit 3.10-3). The Refuge surrounds three sides of the westernmost extension of the proposed

SOIA Area between Franklin Boulevard and I-5. The basis for determining the Refuge boundary included the presence of wetlands and supporting upland habitat that sustain migratory waterfowl and other species of Federal and State Concern. 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 National Wildlife Service is authorized to acquire fee title or easements for lands within (and under certain circumstances near) the Refuge's boundary.

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.

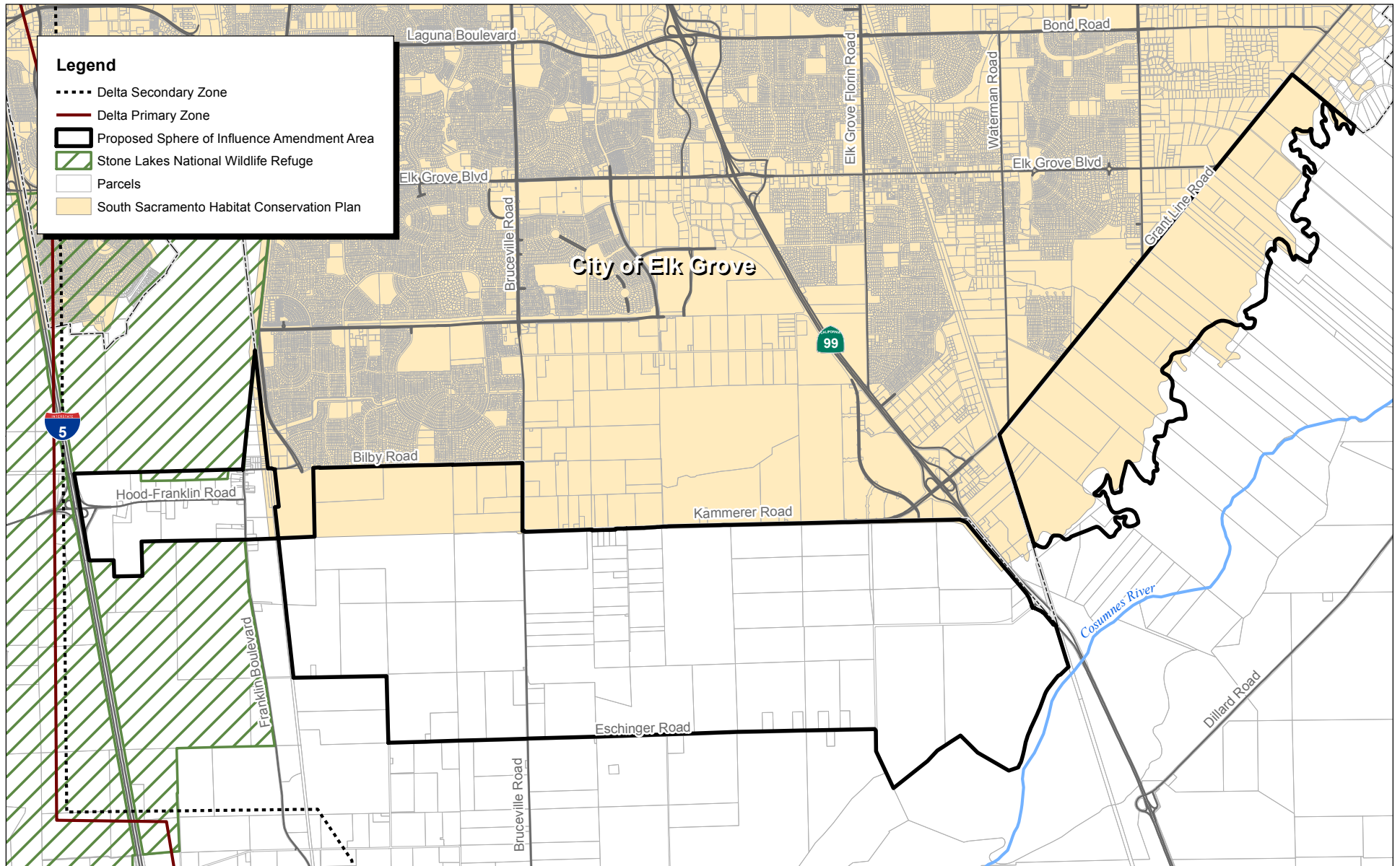
The Stone Lakes National Wildlife Refuge Comprehensive Conservation Plan, Sacramento Delta Land Use and Resource Plan, and Draft South Sacramento Habitat Conservation Plan include areas within or adjacent to the proposed SOIA Area, as shown in Exhibit 3.10-3. As shown in the exhibit, the SOIA Area is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

## **State**

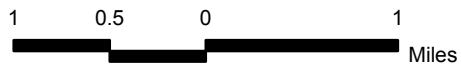
### ***Cortese-Knox-Hertzberg Local Government Reorganization Act***

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.





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



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## Exhibit 3.10-3 Conservation Areas



The Act's purpose (Section 56301) is the discouragement of urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, 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.

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 subject to LAFCo proceedings 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 that aid in the implementation of the Act and are provided below. LAFCo may make exceptions to these general and specific standards if it determines that such exceptions: are necessary

due to unique circumstances; are required to resolve conflicts between general and specific standards; result in improved quality or lower cost of services available; or there exists no feasible or logical alternative.

*Chapter III, General Policies*

- **Policy 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.
- **Policy 2.** LAFCo will encourage communication on actions among the County, cities, and special districts.
- **Policy 5.** 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:
  - (1) At its discretion, approve a project without changes if environmental impacts are insignificant;
  - (2) Require an applicant to modify a project;
  - (3) Establish mitigating measures as a condition of its approval of the proposal;
  - (4) Deny the proposal because of unacceptable adverse environmental impacts;
  - (5) Approve the project despite its significant effects by making findings of overriding concern.
- **Policy 7.** LAFCo will favorably consider those applications, which improve the balance between jobs and housing.

*Chapter IV, General Standards*

**Section A. Spheres of Influence**

- **Standard A.3.** The LAFCo will require that any agency making a proposal for action through LAFCo must have an updated Master Service Element (Municipal Services Review – MSR) 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.

**Section B. Conformance with Applicable General and Specific Plans**

- **Standard 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.
- **Standard B.2.** For Purposes of the above policy, the applicable 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 the city unless the project lies outside of the city's Sphere of Influence; and
  - d. For application for incorporations, this standard is inapplicable.
- **Standard B.3.** For the 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.

#### **Section F. Application of the California Environmental Quality Act to Changes of Organization or Reorganization and Spheres of Influence**

- **Standard F.1:** In general, LAFCo will function as a Lead Agency in situations where:
  - a. LAFCo is the first agency in time to act;
  - b. The primary decision relates to a change of organization or reorganization or sphere of influence;
  - c. The applicant agency is unable to act as the Lead Agency; or
  - d. There are no underlying land use approvals involved.
- **Standard F.2:** 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.
- **Standard F.5:** An EIR completed on a project subject to 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.

## **Section H. Sphere of Influence Plans**

A Sphere of Influence plan is a plan for the probable, ultimate physical boundaries and service areas of a local agency. This section of the LAFCo Policies and Standards sets forth the required contents of a Sphere of Influence Plan, the procedures for submittal and approval of Sphere of Influence Plans and amendments thereto, and the use of Sphere of Influence Plans in LAFCo determinations.

- **Standard H.1:** The Sphere of Influence Plan for all government agencies within the LAFCo's jurisdiction, shall contain the following:
  - a. A map defining the probable boundary of its service area;
  - b. A statement of the present and planned land uses in the area, including agricultural and open space lands;
  - c. The present and probable need for public facilities and services in the area;
  - d. The present capacity of public facilities and adequacy of public services, which the agency provides or is authorized to provide;
  - e. The existence of any relevant social or economic communities of interest in the area; and
  - f. With respect to all cities, sewer districts, water districts, community service districts, drainage districts, and multi-purpose districts within the jurisdiction of Sacramento LAFCo, a Master Services Element as defined in paragraph H.2. below. Other agencies may prepare a Master Services Element.
- **Standard H.2:** A Master Service Element shall contain the following:
  - a. A projection of the geographic extent of service capabilities during the next 20 years denominated in 5-year increments. In the case of cities, a shorter time frame may be appropriate if the applicable General Plan has a shorter planning period.
  - b. Projected level of service capabilities in the same time frames and geographical areas.
  - c. Actual and projected costs of services to consumers. This shall include a statement of actual and projected allocation of the cost of services between existing and new residents.
  - d. The Service Element shall contain sufficient information concerning current and projected capital improvement necessary to support the projected service capabilities for those areas set forth in the element.
- **Standard H.4:** LAFCo will adopt, amend, or revise Sphere of Influence Plans after a public hearing and pursuant to the procedures set forth in this section 56427 and 56428 of the Cortese-Knox Act. Sphere of Influence Plans shall be revised as necessary, but in all cases at least every five years
- **Standard H.10:** In the case of a Sphere of Influence Plan which contains a Master Services Element, if the evidence demonstrates that an agency is unusable provide an adequate level of service within a portion of its ultimate service area boundaries, the Sphere of Influence Plan shall be amended pursuant to the procedures for periodic review such that the ultimate service



boundaries are consistent with the Master Services Element. If the Master Services Element projections demonstrate an adequate level of service beyond the ultimate service boundary, the Sphere of Influence Plan may be amended accordingly.

### Section I. Amendments to Spheres of Influence

- **Standard I.1:** The LAFCo will generally treat a proposed amendment to an agency's Sphere of Influence similarly to an application for approval of a Sphere of Influence. The LAFCo's policies will be applied to applications planned for the mid- to long-range future. For that reason, each of the following sets of policies will apply to applications for amendment to Spheres of Influence:
  - a. General policies;
  - b. Specific policies and standards for annexations to cities and special districts; and
  - c. Specific policies and standards for amendments for amendments to Spheres of Influence.
- **Standard I.2:** The Sphere of Influence Master Services Element (MSR) must be current before additions to a Sphere of Influence will be approved by LAFCo.
- **Standard I.3:** The Sphere of Influence amendments shall precede applications for annexations.
- **Standard I.7:** A phased plan for annexation of Sphere of Influence territory should be included in the Sphere of Influence proposal.
- **Standard I.8:** No amendments to a Sphere of Influence Plan will be approved unless a Master Services Element of the Sphere of Influence Plan exists that has been prepared by a local agency and adopted by LAFCo if required.
- **Standard I.10:** The LAFCo will approve a proposed amendment to a Sphere of Influence only if the subject agency will be the most logical and prospectively most efficient provider of services to the subject territory.

#### *Definition of Open Space*

#### **Sacramento LAFCo uses the following criteria to define open space:**

According to Cortese-Knox-Hertzberg Section 56059, Open Space: Open space means any parcel or area of land or water which is substantially unimproved and devoted to an open-space use, as defined in Section 65560.

Planning, Zoning & Development Law Section 65560 further defines Open Space:

- a. "Local open-space plan" is the open-space element of a county or city general plan adopted by the board or council...."

- b. “Open-space land” is any parcel or area of land or water which is essentially unimproved and devoted to an open-space use as defined in this section, and which is designated on a local, regional or state open space plan as any of the following:
- (1) Open space for the preservation of natural resources including, but not limited to, areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays and estuaries; and coastal beaches, lakeshores, banks of rivers and streams, and watershed lands.
  - (2) Open space used for the managed production of resources, including but not limited to, forest lands, rangeland, agricultural lands and areas of economic importance for the production of food or fiber; areas required for recharge of ground water basins; bays, estuaries, marshes, rivers and streams which are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.
  - (3) Open space for outdoor recreation, including but not limited to, areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas which serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.
  - (4) Open space for public health and safety, including, but not limited to, areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs and areas required for the protection and enhancement of air quality.

***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 current County of Sacramento General Plan, titled Sacramento County General Plan of 2005-2030 (2030 General Plan), was adopted on November 9, 2011. Key changes from the 1993 Sacramento County General Plan include a new growth management strategy, a stronger focus on addressing existing communities and revitalizing aging commercial corridors, a new Economic Development Element, and strategies to reduce greenhouse gas emissions consistent with state law. Elements and policies of the current, adopted General Plan that are pertinent to the proposed SOIA 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 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 jurisdictional 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 2011).

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 2030). The UPA is intended to provide a 25-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 25-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 and 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 plan included community goals, objectives, development policies, and a recommended pattern of future land uses based on community attitudes and aspirations (Elk Grove 2003).

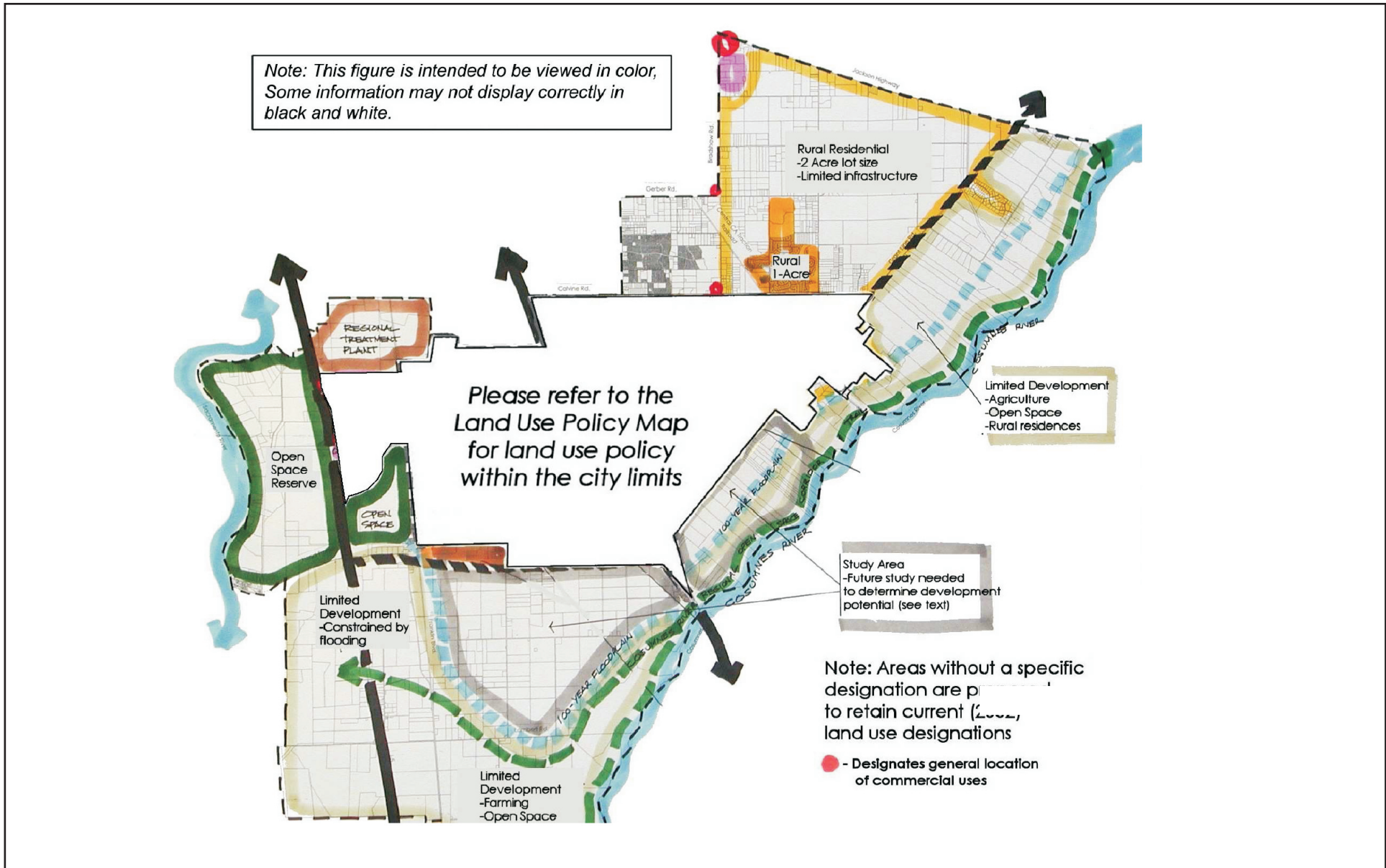
***Sacramento County Laguna Community Plan***

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.



Source: City of Elk Grove.



Michael Brandman Associates

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## Exhibit 3.10-4 Elk Grove General Plan Urban Study Areas

SACRAMENTO LAFCo • ELK GROVE SPHERE OF INFLUENCE AMENDMENT  
RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT





### ***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, lands of the Miwok tribe, and the community of Rancho Murrieta (County of Sacramento, et al. 2010).

### ***SACOG 2035 Metropolitan Transportation Plan***

The Sacramento Area Council of Governments (SACOG) is responsible for the preparation of, and updates to, the Metropolitan Transportation Plan and the new state-required Sustainable Communities Strategy (MTP/SCS), as well as the corresponding Metropolitan Transportation Improvement Program (MTIP). The MTP provides a 20-year transportation vision and corresponding list of projects. The SACOG Board adopted the MTP/SCS at its April 19, 2012 meeting. The MTIP identifies short-term projects (7-year horizon) in more detail.

SACOG is also responsible for the oversight and distribution of most federal and state transportation funding sources. SACOG also develops the air quality plans and compliance measures, which incorporate mobile (vehicular) pollution sources.

### **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.

The impacts related to land use and planning from implementation of the 2003 Elk Grove General Plan were evaluated in the General Plan Environmental Impact Report (EIR). All mitigation measures identified for impacts in the Elk Grove General Plan EIR and adopted by the City continue to remain the responsibility of the City as part of implementation of the General Plan. Consequently, upon approval of any future annexation request for the SOIA Area, those General Plan policies and EIR mitigation measures are assumed to apply to development within the SOIA Area.

### 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, 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 is 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 not split neighborhoods or divide an existing identifiable community of interest and no impact would occur.

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

No impact.

#### ***Mitigation Measures***

No mitigation is required.

**Level of Significance After Mitigation**

No impact.

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

**Impact LU-2:** The project may conflict with an 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.

**Impact Analysis**

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

- Sacramento County General Plan and Zoning Ordinance
- 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 is 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 not proposed to be changed with the SOIA Area, 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.

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

Element	Policy		Consistency Determination
	No.	Text	
Land Use	LU-12	The County shall prohibit land use projects which are not contiguous to the existing UPA, city boundaries, or existing planned communities or master plan areas (i.e. leapfrog development).	<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, are not anticipated to leapfrog, and will be evaluated separately under CEQA for development patterns.
	LU-14	Master or 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 should take into account the physical nature and characteristic of the sub planning areas. The boundaries of these subareas should consider the following constraints and features: roadways, drainage watersheds, school districts, water districts, parks districts, etc.	<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 patterns would be established through implementation of appropriate tools such as specific plans or master plans.
	LU-116	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 potential 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-123	Before granting approval of an amendment to the Land Use Diagram, the Board of Supervisors shall find that: <ul style="list-style-type: none"> <li>the request is consistent with the objectives and policies of the General Plan;</li> <li>the request is consistent with the goals and objectives of a Sacramento County adopted Habitat Conservation Plan;</li> <li>approval of the proposal will not adversely affect the fiscal resources of the County;</li> <li>the project will be consistent with the performance standards in this Plan and, for urban uses in urban growth areas, the project complies with the requirements of LU-13.</li> </ul>	<b>Consistent:</b> The proposed project does not include a General Plan Amendment application. Any potential future development would be subject to CEQA review and address any physical 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	
	LU-125	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 in Table 10 for property located outside of Urban Service Boundary unless consistent with Policy LU-72 (Expansion of urban uses in the Delta).	<b>Consistent:</b> The proposed project does not include a General Plan Amendment application. Any potential future development would be subject to CEQA review and address any land use conflict with the County General Plan.
	LU-126	The County shall not accept applications to amend the Land Use Diagram from a designation in Column A, in Table 10 to an Agricultural-Residential Land Use Designation for property outside the Urban Service Boundary, unless: <ul style="list-style-type: none"> <li>• The property is proximate to an existing area designated for agricultural-residential land use.</li> <li>• The property is consistent with Policy LU-82 &amp; LU-83.</li> <li>• The change in designation will not trigger the need for urban services and cumulative traffic impacts will be within the capacity of the planned road system.</li> </ul>	<b>Consistent:</b> The proposed project does not include a General Plan Amendment application. Any potential future development would be subject to CEQA review and address any physical land use conflict with the County General Plan.
	LU-127	The County shall not expand the Urban Service Boundary unless: <ul style="list-style-type: none"> <li>• There is inadequate vacant land within the USB to accommodate the projected 25 year demand for urban uses; and</li> <li>• The proposal calling for such expansion can satisfy the requirements of a master water plan as contained in the Conservation Element; and</li> <li>• The proposal calling for such expansion can satisfy the requirements of the Sacramento County Air Quality Attainment Plan; and</li> <li>• The area of expansion does not incorporate open space areas for which previously secured open space easements would need to be relinquished; and</li> <li>• The area of expansion does not include the development of important natural resource areas, aquifer recharge lands or prime agricultural lands;</li> <li>• The area of expansion does not preclude implementation of a Sacramento County-adopted Habitat Conservation Plan;</li> </ul> OR	<b>Consistent:</b> The proposed project does not include an expansion of the County’s Urban Service Boundary. Any potential future development would be subject to CEQA review and address any physical 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	
		<ul style="list-style-type: none"> <li>The Board approves such expansion by a 4/5ths vote based upon on finding that the expansion would provide extraordinary environmental, social or economic benefits and opportunities to the County.</li> </ul>	
Circulation	CI-3	Travel modes shall be interconnected to form an integrated, coordinated and balanced multi-modal transportation system, planned and developed consistent with the land uses to be served.	<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, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.
	CI-4	Provide multiple transportation choices to link housing, recreational, employment, commercial, educational, and social services.	<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, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.
	CI-5	Land use and transportation planning and development should be cohesive, mutually supportive, and complement the objective of reducing per capita vehicle miles traveled (VMT).	<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, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.



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

Element	Policy		Consistency Determination
	No.	Text	
	CI-11	To preserve public mobility, freeways and thoroughfares should have limited access and maintain functional characteristics that predominantly accommodate through traffic.	<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, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.
	CI-13	Collaborate with regional transportation planning agencies and neighboring jurisdictions to provide cross jurisdictional mobility.	<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, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.
	CI-21	Collaborate with neighboring jurisdictions and other agencies to achieve land use patterns and densities in areas planned for development that support transit services, preserve adequate rights-of-way, and enhance transit services in the designated transit corridors.	<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, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.
	CI-22	Collaborate with the Sacramento Area Council of Governments and transit service providers to pursue all available sources of funding for transit services when consistent with General Plan policies and long-term funding capabilities.	<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, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.

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

Element	Policy		Consistency Determination
	No.	Text	
	CI-36	Collaborate with neighboring jurisdictions and regional agencies to coordinate planning and development of the County's bikeways, pedestrian facilities and multiuse trails with those of neighboring jurisdictions, and to support a regional bicycle and pedestrian network.	<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, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.
	CI-42	Collaborate with other agencies to develop measures to provide for more efficient traffic flow, reduce vehicular travel demand and meet air quality goals.	<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, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.
Open Space	OS-1	Actively plan to protect, as open space, areas of natural resource value, which may include, but are not limited to, wetlands preserves, riparian corridors, woodlands, and floodplains associated with riparian drainages.	<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	
	OS-2	Maintain open space and natural areas that are interconnected and of sufficient size to protect biodiversity, accommodate wildlife movement, and sustain ecosystems.	<b>Consistent:</b> The proposed project is consistent with this policy, as no development is being proposed that would affect 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.
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> Potential 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> Potential 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 for major planning efforts shall be prepared for 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>Determine the future 100-year flood elevations associated with planned and full development of the watershed;</li> <li>Determine the future 100-year floodplain boundaries for both flood elevations (planned and full development) based on minimum 2-foot contour intervals;</li> <li>Assess the feasibility of gravity drainage into the existing flowline of the stream;</li> <li>Assess the feasibility of alternative means of drainage into the stream;</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	
		<ul style="list-style-type: none"> <li>e. Identify potential locations for sedimentation ponds and other stormwater treatment facilities;</li> <li>f. Determine practical channel improvements and/or detention basins to provide the flood control needs of the proposed development;</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> <li>i. Develop measures for protecting and mitigating for federal and state listed endangered species.</li> <li>j. Develop and ensure implementation of measures that would reduce vector larvae;</li> <li>k. Identify appropriate plant species to be included as part of the natural features of the comprehensive drainage plan.</li> </ul>	
	SA-15	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.
	SA-17	For residential zoning, the area outside the 100-year floodplain must be contiguous or reasonably situated to provide buildable area for a residence and associated structures. Examples of structures include swimming pools, sheds, barns, detached garages, and other outbuildings that are normally associated with residential development. There may be exceptions (such as the Delta area) as allowed in the Floodplain Management Ordinance.	<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	
	SA-22	Areas within a 100-year floodplain shall not be upzoned to a more intensive use unless and until a Master Drainage Plan is prepared that identifies areas of the floodplain that may be developed.	<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.
	SA-33	The County shall continue its coordinative efforts, including evacuation planning, with service agencies, the cities within the County, and cities within surrounding counties.	<b>Consistent:</b> The City will continue to consult with the County for evacuation planning for all potential future development in the SOIA Area.
	SA-36	The County shall require that high intensity land uses proposed in areas highly susceptible to multiple hazards, such as the Delta, provide mitigation measures that include emergency evacuation routes. Consideration shall be given to the need for additional roads, particularly in the Delta, that may serve as evacuation routes. The County Regional Emergency Operations Office has a study of evacuation routes for various levee breach scenarios for reaches of the Sacramento River north of Freeport and for the American River.	<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 hazardous materials impacts. Refer to Section 3.8, Hazards and Hazardous Materials for further discussion.
Air Quality	AQ-1	New development shall be designed to promote pedestrian/bicycle access and circulation to encourage community residents to use alternative modes of transportation to conserve air quality and minimize direct and indirect emission of air contaminants.	<b>Consistent:</b> The proposed project is consistent with this policy as any potential future development would be subject to CEQA review and evaluate pedestrian/bicycle access and circulation.
	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 potential future development would be subject to CEQA review and evaluate use of BACT to reduce air pollution.
	AQ-14	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 plans and proposals proposed by the County.	<b>Consistent:</b> The proposed project is consistent with this policy as any potential future development would be required to comply with AQMD's regulations and would be subject to CEQA review.

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

Element	Policy		Consistency Determination
	No.	Text	
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 reasonably foreseeable 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.
	PF-6	Interceptor, trunk lines, and flow attenuation facilities shall operate within their capacity limits without overflowing.	<b>Consistent:</b> The proposed project is consistent with this policy as future urbanization and development within the SOIA Area would be subject to its own CEQA review to ensure that utilities would continue to operate within their capacity. Refer to Section 3.16, Utilities and Service Systems for further discussion.
	PF-119	County Planning will notify SMUD's Real Estate Services Department and PG&E's Land Department when Planning initiates studies to prepare, modify, or update the County General Plan, a Community Plan, or Public Facilities Infrastructure Plan.	<b>Consistent:</b> The proposed project is consistent with this policy as future urbanization and development within the SOIA Area would continue to be required to notify these agencies. Refer to Section 3.16, Utilities and Service Systems for further discussion.
	PF-120	The County will work cooperatively with the local recreation and park districts to help assure that the provision of additional parks and recreation facilities keeps pace with urban growth within the County.	<b>Consistent:</b> The proposed project is consistent with this policy as future urbanization and development within the SOIA Area would continue to consult with regional parks agencies to ensure that adequate parks are available in the SOIA Area. Refer to Section 3.14, Public Services for further discussion.



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

Element	Policy		Consistency Determination
	No.	Text	
Hazardous Materials	HM-4	The handling, storage, and transport of hazardous materials shall be conducted in a manner so as not to compromise public health and safety standards.	<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 the handling, storage, and transport of hazardous materials. Refer to Section 3.8, Hazards and Hazardous Materials for further discussion.
	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 3.9, Hydrology and Water Quality 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 3.9, Hydrology and Water Quality 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.

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

Element	Policy		Consistency Determination
	No.	Text	
	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 potential 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 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, statewide importance, unique and local importance farmlands located outside of the USB from urban encroachments.	Consistent with Mitigation: 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. Mitigation Measure AG-1 reduces the severity of this impact and serves to protect prime farmlands within the County. Refer to Section 3.2, Agricultural Resources for further discussion.
	AG-5	Projects resulting in the conversion of more than fifty (50) acres of farmland shall be mitigated within Sacramento County, except as specified in the paragraph below, based on a 1:1 ratio, for the loss of the following farmland categories through the specific planning process or individual project entitlement requests to provide in-	<b>Consistent with Mitigation:</b> The proposed project could result in the loss of prime farmlands; however, the project is consistent with this policy after implementation of Mitigation Measure AG-1. Refer to Section 3.2, Agricultural Resources for further discussion.

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

Element	Policy		Consistency Determination
	No.	Text	
		<p>kind or similar resource value protection (such as easements for agricultural purposes):</p> <ul style="list-style-type: none"> <li>• prime, statewide importance, unique, local importance, and grazing farmlands located outside the USB;</li> <li>• prime, statewide importance, unique, and local importance farmlands located inside the USB.</li> </ul> <p>The Board of Supervisors retains the authority to override impacts to Unique, Local, and Grazing farmlands, but not with respect to Prime and Statewide farmlands.</p> <p>However, if that land is also required to provide mitigation pursuant to a Sacramento County endorsed or approved Habitat Conservation Plan (HCP), then the Board of Supervisors may consider the mitigation land provided in accordance with the HCP as meeting the requirements of this section including land outside of Sacramento County.</p> <p>Note: This policy is not tied to any maps contained in the Agricultural Element. Instead, the most current Important Farmland map from the Department of Conservation should be used to calculate mitigation.</p>	
	AG-21	The County encourages the preservation of prime, statewide importance, unique and local importance farmlands, including opposing any residential or commercial development for the Cosumnes River or Deer Creek riparian areas that are not compatible with agricultural use.	<b>Consistent with Mitigation:</b> The proposed project is consistent with this policy, as it makes efforts to preserve important farmland in the SOIA Area by requiring agricultural mitigation. Refer to Section 3.2, Agricultural Resources for further discussion.
Conservation	CO-2	Support the perfection of local water rights and entitlements.	
	CO-8	Applicants proposing developments in areas with significant groundwater recharge characteristics shall evaluate the impact of said development on groundwater recharge and quality. This evaluation should recognize criteria defined in any broader Countywide determination and/or evaluation of groundwater recharge areas.	<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-14	Direct development away from prime or statewide importance farmlands or otherwise provide for mitigation as required by AG-5 slowing the loss of additional farmland conversion to other uses.	<b>Consistent with Mitigation:</b> The proposed project could potentially result in conversion of prime or statewide farmland. Mitigation Measure MM AG-1 ensures that this impact would be less than significant. Refer to Section 3.2, Agricultural Resources for further discussion.
	CO-24	Comply with the Sacramento Areawide National Pollutant Discharge Elimination System Municipal Stormwater Permit (NPDES Municipal Permit) or subsequent permits, issued by the Central Valley Regional Water Quality Control Board (Regional Board) to the County, and the Cities of Sacramento, Elk Grove, Citrus Heights, Folsom, Rancho Cordova, and Galt (collectively known as the Sacramento Stormwater Quality Partnership [SSQP]).	<b>Consistent:</b> The proposed project is consistent with this policy. Potential 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.
	CO-28	Comply with other water quality regulations and NPDES permits as they apply to County projects or activities, such as the State's Construction General Permit and Aquatic Pesticides Permit.	<b>Consistent:</b> The proposed project is consistent with this policy. Potential 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.
	CO-53	Encourage BMPs and appropriate soil conservation practices regularly utilized by farmers and ranchers.	<b>Consistent:</b> All potential future development would be subject to preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) under the NPDES Permit for construction activities that would disturb an area of 1 acre or more. The SWPPP must identify and implement BMPs. Refer to Section 3.6, Geology, Soils and Seismicity for further discussion.

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

Element	Policy		Consistency Determination
	No.	Text	
	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-58	Ensure no net loss of wetlands, riparian woodlands, and oak woodlands.	<b>Consistent:</b> Potential 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-59	Ensure mitigation occurs for any loss of or modification to the following types of acreage and habitat function: <ul style="list-style-type: none"> <li>• vernal pools,</li> <li>• wetlands,</li> <li>• riparian,</li> <li>• native vegetative habitat, and</li> <li>• special status species habitat.</li> </ul>	<b>Consistent:</b> Potential future development would be subject to CEQA review and address project specific impacts on vernal pools, wetlands, riparian, native vegetation habitat, and special status species habitat. Refer to Section 3.4, Biological Resources for further discussion.
	CO-60	Mitigation should be directed to lands identified on the Open Space Vision Diagram and associated component maps (please refer to the Open Space Element).	<b>Consistent:</b> Potential future development would be subject to CEQA review and address project specific impacts on biological mitigation lands. Refer to Section 3.4, Biological Resources for further discussion.
	CO-61	Mitigation should be consistent with Sacramento County-adopted habitat conservation plans.	<b>Consistent:</b> MM BIO-1a requires the City of Elk Grove to participate in the South Sacramento County Habitat Conservation Plan or the preparation and implementation of a Habitat Conservation Management Plan (HCMP) for all affected special status species and habitats.
	CO-62	Permanently protect land required as mitigation.	<b>Consistent:</b> Land within the SOIA area required as mitigation will continue to be permanently protected under the proposed project.

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

Element	Policy		Consistency Determination
	No.	Text	
	CO-63	Vernal pools, wetlands, and streams within identified preserves shall not be drained, excavated, or filled for the purpose of converting the land to another use. If fill or modification is required for Drainage Master Plans, stormwater quality, or levee maintenance, creation or restoration of an equal amount must occur within the boundaries of the preserve to achieve no net loss consistent with policy CO-58.	<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.
	CO-66	Mitigation sites shall have a monitoring and management program including an adaptive management component including an established funding mechanism. The programs shall be consistent with Habitat Conservation Plans that have been adopted or are in draft format.	<b>Consistent:</b> MM BIO-1a requires the City of Elk Grove to participate in the South Sacramento County Habitat Conservation Plan or the preparation and implementation of a Habitat Conservation Management Plan (HCMP) for all affected special status species and habitats.
	CO-70	Community Plans, Specific Plans, Master Plans and development projects shall: <ul style="list-style-type: none"> <li>include the location, extent, proximity and diversity of existing natural habitats and special status species in order to determine potential impacts, necessary mitigation and opportunities for preservation and restoration.</li> <li>be reviewed for the potential to identify nondevelopment areas and establish preserves, mitigation banks and restore natural habitats, including those for special status species, considering effects on vernal pools, groundwater, flooding, and proposed fill or removal of wetland habitat.</li> <li>be reviewed for applicability of protection zones identified in this Element, including the Floodplain Protection Zone, Stream Corridor Ordinance, Cosumnes River Protection Combining Zone and the Laguna Creek Combining Zone.</li> </ul>	<b>Consistent:</b> Potential 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.

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

Element	Policy		Consistency Determination
	No.	Text	
	CO-75	Maintain viable populations of special status species through the protection of habitat in preserves and linked with natural wildlife corridors.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that potential future development would address project specific impacts on biological resources. Refer to Section 3.4, Biological Resources for further discussion.
	CO-76	Habitat conservation plans shall be adopted by the county to provide a comprehensive strategy to protect and aid in the recovery of special status species.	<b>Consistent:</b> The proposed project is consistent with this policy and potential 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 being prepared and will be subject to environmental review. It has not been adopted as of this writing.
	CO-78	Plans for urban development and flood control shall incorporate habitat corridors linking habitat sites for special status species. (Please also refer to the Open Space Element for related policies.)	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that potential future development would address project specific impacts on biological resources. Refer to Section 3.4, Biological Resources for further discussion.
	CO-79	Manage vegetation on public lands with special status species to encourage locally native species and discourage nonnative invasive species.	<b>Consistent:</b> Under the SOIA, re-vegetation using native plant species will be encouraged; use of non-native species shall be discouraged. Use of invasive species will be prohibited. Refer to Section 3.4, Biological Resources for further discussion.
	CO-80	Control human access to sensitive habitat areas on public lands to minimize impact upon and disturbance of special status species.	<b>Consistent:</b> Sensitive habitat areas within the SOIA Area will continue to have controlled human access. Refer to Section 3.4, Biological Resources for further discussion.
	CO-89	Protect, enhance and maintain riparian habitat in Sacramento County.	<b>Consistent:</b> Riparian habitats within the SOIA Area will continue to be protected, enhanced and maintained under the SOIA. 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-91	Discourage introductions of invasive, non-native aquatic plants and animals.	<b>Consistent:</b> Invasive, non-native aquatic plants and animals will continue to be discouraged under the SOIA. Refer to Section 3.4, Biological Resources for further discussion.
	CO-93	Discourage fill in the 100-year floodplain (Please also refer to CO-117).	<b>Consistent:</b> Fill within the 100 year floodplain in the SOIA Area will continue to be discouraged under the SOIA. Refer to Section 3.4, Biological Resources for further discussion.
	CO-94	Development within the 100-year floodplain and designated floodway of Sacramento streams, sloughs, creeks or rivers shall be: <ul style="list-style-type: none"> <li>• Consistent with policies to protect wetlands and riparian areas; and</li> <li>• Limited to land uses that can support seasonal inundation</li> </ul>	<b>Consistent:</b> Approximately 13 percent of the SOIA Area lies within FEMA 100-year floodplain. Potential future development of the SOIA Area would be subject to CEQA to ensure that impacts due to flooding are not significant.
	CO-102	Promote and encourage habitat restoration efforts on and adjacent to our river floodways.	<b>Consistent:</b> Habitat restoration efforts in the SOIA Area will continue to be encouraged under the SOIA. Refer to Section 3.4, Biological Resources for further discussion.
	CO-114	Protect stream corridors to enhance water quality, provide public amenities, maintain flood control objectives, preserve and enhance habitat, and offer recreational and educational opportunities.	<b>Consistent:</b> Stream corridors in the SOIA Area will continue to be protected under the SOIA. Refer to Section 3.4, Biological Resources for further discussion.
	CO-126	Prohibit obstruction or underground diversion of natural waterways.	<b>Consistent:</b> Obstruction of natural waterways in the SOIA Area will continue to be prohibited under the SOIA. Refer to Section 3.4, Biological Resources for further discussion.
	CO-127	Protect, preserve, and restore migratory routes for anadromous species.	<b>Consistent:</b> Migratory routes in the SOIA Area will continue to be protected, preserved and restored under the SOIA. Refer to Section 3.4, Biological Resources for further discussion.
	CO-136	Prohibit the loss of mitigated resource areas.	<b>Consistent:</b> Loss of mitigated resources areas in the SOIA Area will continue to be prohibited under the SOIA. 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-143	Work cooperatively with local utilities to assure that new trees are planted in locations that will maximize energy conservation and air quality benefits.	<b>Consistent:</b> Elk Grove will continue to consult with local utilities in the SOIA Area to ensure conservation and air quality benefits of tree planting under the SOIA. Refer to Section 3.4, Biological Resources for further discussion.
	CO-144	Support a regional approach consistent with the provisions of Greenprint for the protection, replacement, and mitigation of trees.	<b>Consistent:</b> The SOIA will be consistent with the Greenprint regional approach for the protection, replacement and mitigation of trees. Refer to Section 3.4, Biological Resources for further discussion.
	CO-152	Consultations with Native American tribes shall be handled with confidentiality and respect regarding sensitive cultural resources on traditional tribal lands.	<b>Consistent:</b> Consultations with Native American tribes regarding sensitive cultural resources will continue to be handled with confidentiality and respect under the SOIA. Refer to Section 3.5, Cultural Resources for further discussion.
	CO-153	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 Committee shall coordinate with the Native American Heritage Commission in developing recommendations.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that potential 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-154	Protection of significant prehistoric, ethnohistoric and historic sites within open space easements to ensure that these resources are preserved in situ for perpetuity.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that potential 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-155	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	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that potential future development activities would implement procedures to protect native burial sites 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	
		of proof that off site reinterment is the only feasible alternative. Reinterment shall be the responsibility of local tribal representatives.	
	CO-158	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 potential 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-161	As a condition of approval for discretionary projects, require appropriate mitigation to reduce potential impacts where development could adversely affect paleontological resources.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that potential 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	Projects located within areas known to be sensitive for paleontological resources, should be monitored to ensure proper treatment of resources and to ensure crews follow proper reporting, safeguards, and procedures.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that potential future development activities would implement procedures to monitor to ensure proper treatment of resources pursuant to CEQA. Refer to Section 3.5, Cultural Resources for further discussion.
	CO-164	Structures having historical and architectural importance shall be preserved and protected.	<b>Consistent:</b> The proposed project is consistent with this policy and acknowledges that potential future development activities would implement procedures to ensure the protection of historical structures 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	
Economic Development	ED-3	Ensure a controlled, balanced, and sustainable development pattern on a sub-regional and regional level through comprehensive planning incorporating multiple disciplines.	<b>Consistent:</b> No physical development is being proposed by the project at this time and no project applications have been submitted. However, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use impacts with a regional perspective.
	ED-16	Encourage the establishment of agriculture uses, specialty crops, and specialized animal facilities in the Agriculture land-use category, including complimentary uses.	<b>Consistent:</b> No physical development is being proposed by the project at this time and no project applications have been submitted. However, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use impacts with a regional perspective.
Energy	EN-3	Encourage the conservation and rehabilitation of existing housing and the revitalization of older, more intensively developed neighborhoods in the urban area.	<b>Consistent:</b> No physical development is being proposed by the project at this time and no project applications have been submitted. However, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use impacts with a regional perspective.
	EN-5	Reduce travel distances and reliance on the automobile and facilitate increased use of public transit through appropriate land use plans and regulations.	<b>Consistent:</b> No physical development is being proposed by the project at this time and no project applications have been submitted. However, potential future development requiring discretionary approvals would be subject to CEQA review and address physical land use and transportation impacts with a regional perspective.
Source: Sacramento County General Plan, 2011.			

*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 and Exhibit 3.10-4). 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>Consistent::</b> The proposed project is 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 consult 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>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 will be required to prepare a traffic impact analysis that would address Level of Service.
	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.”

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

Element	Policy		Consistency Determination
	No.	Text	
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>Consistent:</b> The proposed project is consistent with this policy, based upon implementation of Mitigation Measure AG-1. Refer to Section 3.2, Agricultural Resources for further discussion.
	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.

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

Element	Policy		Consistency Determination
	No.	Text	
	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.
	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.

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

Element	Policy		Consistency Determination
	No.	Text	
	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 similar features, including any such features which may be required by the Zoning Code or other applicable codes.	<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	
	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 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	<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											
	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	<p>The following table illustrates the Zoning Districts, which implement the land use categories shown on the Land Use Policy Map of this General Plan.</p> <table border="1" data-bbox="577 1133 1247 1393"> <thead> <tr> <th>Land Use Category</th> <th>Zoning Districts</th> </tr> </thead> <tbody> <tr> <td>Commercial</td> <td>AC, LC, GC, SC, TC</td> </tr> <tr> <td>Office</td> <td>BP, MP</td> </tr> <tr> <td>Office/Multi-Family</td> <td>BP, MP, (MF) overlay</td> </tr> <tr> <td>Commercial/Office</td> <td>AC, LC, GC, SC, TC, C-O, BP, MP</td> </tr> </tbody> </table>	Land Use Category	Zoning Districts	Commercial	AC, LC, GC, SC, TC	Office	BP, MP	Office/Multi-Family	BP, MP, (MF) overlay	Commercial/Office	AC, LC, GC, SC, TC, C-O, BP, MP	<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.
Land Use Category	Zoning Districts												
Commercial	AC, LC, GC, SC, TC												
Office	BP, MP												
Office/Multi-Family	BP, MP, (MF) overlay												
Commercial/Office	AC, LC, GC, SC, TC, C-O, BP, MP												

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

Element	Policy		Consistency Determination																								
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Land Use Category	Zoning Districts																										
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Public and Private Open Space/ Recreation	O zoning district; any agricultural and residential zoning district; C-O zoning district																										
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Estate Residential	AR-1, RD-1, RD-2, RD-3, RD-4																										
Low Density Residential	RD-4, RD-5, RD-6, RD-7																										

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

Element	Policy		Consistency Determination																		
	No.	Text																			
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	LU-4	<p>All land use approvals, including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Zoning,</li> <li>• Planning documents (such as Specific Plans and Special Planning Areas),</li> <li>• Tentative Maps,</li> <li>• Conditional Use Permits,</li> <li>• Etc.,</li> </ul> <p>shall be required to conform with the General Plan.</p>	<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	<p>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.</p>	<b>Consistent:</b> The SOIA Area is envisioned to accommodate future growth and assist the City in achieving a jobs-to-housing balance.																		

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

Element	Policy		Consistency Determination
	No.	Text	
	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 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.	<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.
	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 consult with LAFCo consistent with Policy LU-13.
	LU-14	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. Annexations should include a comprehensive land use plan for the affected territory, including Pre-zoning and a plan for infrastructure financing and phasing. Annexations should: <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.	Consistent: 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.



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

Element	Policy		Consistency Determination
	No.	Text	
	PF-19	Public facilities should be phased in a logical manner which avoids “leapfrog” development and 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.	<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.
	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 consult 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.
	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.

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

Element	Policy		Consistency Determination
	No.	Text	
	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 Sheriff’s Department, and other appropriate agencies in hazardous materials route planning and incident response.	<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.
	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.

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

Element	Policy		Consistency Determination
	No.	Text	
	SA-25	The City supports 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 city development of the SOIA Area would be subject to CEQA review and comply with applicable seismic code, as required 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 Cosumnes Community Services District (CCSD) 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 the CCSD 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 Recirculated 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.
	5	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> This Recirculated 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	
IV. LAFCo General Standards	A.2	<p>Spheres of Influence are the primary planning tool for LAFCo. The LAFCo has developed standards related to the Master Services Element of any agency’s Spheres of Influence. Agencies must have an updated Master Services Element which meets the following standards:</p> <ul style="list-style-type: none"> <li>• Is consistent with the Master Services Element (Municipal Services Review) of the Spheres of Influence of any overlapping jurisdiction;</li> <li>• Demonstrates that adequate services will be provided within the time frame needed by the inhabitants of the area included in the proposed boundary;</li> <li>• Identifies existing land use and a reasonable projection of land uses which would occur if services would be provided consistent with the updated element;</li> <li>• Presents a map that clearly indicates the location of existing and proposed facilities, including plan for timing and location of facilities;</li> <li>• Describes the nature of service to be provided;</li> <li>• Describes the service level capacity of the service provider’s facilities;</li> <li>• Identifies service level to be provided;</li> <li>• Describes any actions, improvements, or construction necessary to reach required service levels, including costs and financing methods;</li> <li>• Provides copies of district enabling legislation pertinent to the provision of service levels, including costs and financing methods;</li> <li>• Identifies projected revenue and identifies savings occurring as a result of the action; and</li> <li>• Provides existing and five year population projections within agency boundaries.</li> </ul>	<p><b>Consistent:</b> The proposed project is consistent with this policy. The City of Elk Grove prepared a Municipal Services Review that is consistent with the requirements of Policy A.2.</p>

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

Element	Policy		Consistency Determination
	No.	Text	
	A.3	The LAFCo will require that any agency making 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.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.
IV. LAFCo General Standards	E.1	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: a. The land subject to the change of organization or reorganization is contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development. 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. 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	<b>Consistent with Determination:</b> The project could result in the loss of prime farmlands. The proposed project may be consistent with this policy, pursuant to LAFCo findings for Policy E.1 criteria a through e. Certain criteria for consistency are outside the scope of CEQA and this document. Specifically, criteria d, which requires a finding that insufficient vacant non-prime lands existing within the applicable SOI, is not within the analysis purview of this document. Refer to Section 3.2, Agricultural Resources for further discussion.

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

Element	Policy		Consistency Determination
	No.	Text	
		<p>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> <p>The agricultural significance of the subject and adjacent areas relative to other agricultural lands in the region.</p> <p>The use of the subject and the adjacent areas.</p> <p>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 through or adjacent to, any other agricultural lands which lie between the project site and existing facilities.</p> <p>Whether natural or man-made barriers serve to buffer adjacent or nearby agricultural land from the effects of the proposed development.</p> <p>Applicable provisions of the General Plan open space and land use elements, applicable growth-management policies, or other statutory provisions designed to protect agriculture.</p>	



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

Element	Policy		Consistency Determination
	No.	Text	
	E2	<p>LAFCo will not make the affirmative findings that the proposed development of the subject lands is consistent with the Spheres of Influence in the absence of an approved Sphere of Influence Plan. LAFCo will not make the affirmative findings that sufficient non-prime land exists within the Spheres of Influence Plan unless the applicable jurisdiction has:</p> <ul style="list-style-type: none"> <li>• Identified within its Spheres of Influence all “prime agricultural land” as defined herein.</li> <li>• Enacted Measures to preserve prime agricultural land identified within its Sphere of Influence for agricultural use.</li> <li>• Adopted as part of its General Plan specific measures to facilitate and encourage infill development as an alternative to development of agricultural lands.</li> </ul>	<p><b>Consistent with Determination:</b> This policy pertains to annexation applications and the proposed project is a Sphere of Influence Amendment. The city has identified prime agricultural land within its Sphere of influence. This Draft EIR includes measures to preserve agricultural land (MM AG-1) and for the preparation of an agricultural land use compatibility plan for the SOIA Area to reduce conflicts that could result in premature conversion of agricultural land (MM AG-3). The City of Elk Grove General Plan contains policies CAQ-2 through 4, which address conservation of agricultural resources. These determinations would be made at annexation.</p>
IV. LAFCo General Standards	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> This Recirculated 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.
	H1	The Sphere of Influence Plan for all government agencies within the LAFCo’s jurisdiction, shall contain the following: a. A map defining the probable boundary of its service area; b. A statement of the present and planned land uses in the area, including agricultural and open space lands; c. The present and probable need for public facilities and services in the area; d. The present capacity of public facilities and adequacy of public services, which the agency provides or is authorized to provide; e. The existence of any relevant social or economic communities of interest in the area; and f. With respect to all cities, sewer districts, water districts, community service districts, drainage districts, and multi-purpose districts within the jurisdiction of Sacramento LAFCo, a Master Services Element as defined in paragraph H.2. below. Other agencies may prepare a Master Services Element.	<b>Consistent:</b> The City is required to prepare a Sphere of Influence Plan that must be approved by LAFCo. The Plan would be based in part upon information provided in the Municipal Service Review prepared for the SOIA.

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

Element	Policy		Consistency Determination
	No.	Text	
	H2	A Master Service Element shall contain the following: a. A projection of the geographic extent of service capabilities during the next 20 years denominated in 5-year increments. In the case of cities, a shorter time frame may be appropriate if the applicable General Plan has a shorter planning period. b. Projected level of service capabilities in the same time frames and geographical areas. c. Actual and projected costs of services to consumers. This shall include a statement of actual and projected allocation of the cost of services between existing and new residents. d. The Service Element shall contain sufficient information concerning current and projected capital improvement necessary to support the projected service capabilities for those areas set forth in the element.	<b>Consistent:</b> The City is required to prepare a Master Service Element that must be approved by LAFCo. The Plan would be based in part upon information provided in the Municipal Service Review prepared for the SOIA.
	H4	LAFCo will adopt, amend, or revise Sphere of Influence Plans after a public hearing and pursuant to the procedures set forth in this section 56427 and 56428 of the Cortese-Knox Act. Sphere of Influence Plans shall be revised as necessary, but in all cases at least every five years.	<b>Consistent.</b> The proposed SOIA will be subject to a public hearing.
	H10	In the case of a Sphere of Influence Plan which contains a Master Services Element, if the evidence demonstrates that an agency is unusable provide an adequate level of service within a portion if its ultimate service area boundaries, the Sphere of Influence Plan shall be amended pursuant to the procedures for periodic review such that the ultimate service boundaries are consistent with the Master Services Element. If the Master Services Element projections demonstrate an adequate level of service beyond the ultimate service boundary, the Sphere of Influence Plan may be amended accordingly.	<b>Consistent.</b> The proposed SOIA includes an updated Municipal Services Review that will be reviewed by LAFCo.
Source: Sacramento LAFCo Policy, Standards and Procedures Manual.			

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

The proposed SOIA would maintain Sacramento County General Plan Land Use designations, and the project would not conflict with the general direction of applicable Community Plans. 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 be consistent with the Elk Grove and Laguna Community plans.

*SACOG 2035 Metropolitan Transportation Plan/Sustainable Communities Strategy*

The SACOG MTP/SCS does not identify the SOIA Area for growth as identified in this Recirculated Draft EIR. Therefore, the SOIA does have a consistency conflict with the MTP/SCS.

Physical impacts related to inconsistency with area land use plans are addressed throughout this Recirculated Draft EIR. Implementation of the mitigation measures found in this document would ensure that physical impacts related to land use plan inconsistencies would be mitigated to the extent feasible.

***Level of Significance Before Mitigation***

Potentially significant impact.

***Mitigation Measures***

Implementation of all mitigation measures in this Recirculated Draft EIR.

***Level of Significance After Mitigation***

Implementation of the project would result in the expansion of the SOI for the City of Elk Grove. For this reason, the Sacramento County General Plan policies would not apply because there are no policies associated specifically with the consideration of sphere of influence proposals.

Less than significant impact.

**Conservation Plan Consistency**

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**Impact LU-3:           The project may 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 Area boundaries have been delineated to avoid inclusion of areas that are a part of the Stone Lakes Natural Wildlife Refuge. As shown in Exhibit 3.10-3, the SOIA Area would encroach onto the refuge boundaries in a small portion of parcels located north of Hood-Franklin Road and west of I-5. The National Wildlife Service holds a permanent conservation easement intended to protect vernal pools and grasslands on this acreage as well as the large area immediately north of the SOIA Area. The proposed project would not violate any of the Comprehensive Conservation Plan policies identified above. Furthermore, no potential future development under the proposed SOIA would occur in the Stone Lakes National Wildlife Refuge, as conservation easements would restrict such development. Elk Grove designates the Stone Lakes land as Open Space Reserve in their land use map. The City would continue to respect the boundaries of the Refuge under the SOIA. Physical impacts related to the Stone Lakes National Wildlife Refuge, including discussion of foraging habitats, are discussed in Section 3.4 Biological Resources in this document. Nevertheless, the proposed project, because of minor encroachment onto refuge boundaries, may conflict with the refuge's Comprehensive Conservation Plan. Implementation of Mitigation Measure BIO-1a, as described in Section 3.4 Biological Resources would reduce this impact to less than significant.

### *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.

### *Cosumnes River Preserve*

The Cosumnes River Preserve consists of natural and working agricultural lands protected by government agencies and private conservation organizations holding fee title, a conservation easement, or both. Portions of the Preserve have been recognized as an Eco-Reserve by the California Fish and Game Commission, a Globally Important Bird Area by the National Audubon Society and the American Bird Conservancy, and a National Natural Landmark by the National Park Service.

The proposed SOIA Area would encroach onto an agricultural buffer that currently exists between the Cosumnes River Preserve and the urbanized area of Elk Grove, removing habitat for special-status species that depend on this preserve and the area within the proposed SOIA Area.

### *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 Area is 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. Conversion of undeveloped lands to urban development in land located outside the SSHCP's designated Urban Development Area would require adjustments to the City's boundary, approval by LAFCo, general plan amendments, rezoning, and changes to policies regarding the provision of services. Implementation of Mitigation Measure BIO-1a, as described in Section 3.4 Biological Resources, 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. Future specific development has not yet been determined, and as such, potential impacts related to the location of such development near the sensitive land uses described in this impact cannot be addressed. However, future projects within the SOIA Area will be subject to their own environmental review, and would be required to follow the City's land use requirements, as well as comply with the mitigation measures related to physical environmental effects found throughout this Recirculated Draft EIR.

***Level of Significance Before Mitigation***

Potentially significant impact.

***Mitigation Measures***

Implementation of Mitigation Measure MM BIO-1a, which requires the City of Elk Grove to participate in the South Sacramento County Habitat Conservation Plan or the preparation and implementation of a Habitat Conservation Management Plan (HCMP) for all affected special status species and habitats.

***Level of Significance After Mitigation***

Significant and unavoidable impact.

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## Open Space Resources Conversion

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**Impact LU-4:** The project may lead to the conversion of open space resources, as defined by Sacramento LAFCo, 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. As stated in the Regulatory Framework above, LAFCo includes unimproved lands devoted to agricultural lands within its definition of open space. 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. The proposed project by itself does not involve 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. However, approval of an SOIA by LAFCo indicates that the Commission has designated the revised SOIA Area for future urbanization; therefore, impacts related to permanent conversion of open space uses to urban uses would be potentially significant. Although the project does not involve any development proposals or changes to land use, it is assumed that the project would indirectly result in urbanization of the SOIA Area, as discussed in the Project Description. Therefore, as the project would allow the City to prepare a Land Use Plan and submit applications for annexation of the SOIA Area, the project may indirectly create pressure to convert open space to urban uses. Implementation of Mitigation Measure AG-1 would reduce the conversion of open space resources through requiring offsets be set aside in permanent conservation easements; however, impacts would remain significant and unavoidable due to the net loss of open space that would occur on a regional and county basis.

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

Potentially significant impact.

### ***Mitigation Measures***

Implement Mitigation Measure AG-1.

### ***Level of Significance After Mitigation***

Significant and unavoidable impact.

