

Appendix A: Notice of Preparation and Responses



Sacramento Local Agency Formation Commission

NOTICE OF PREPARATION

Proposed City of Elk Grove Sphere of Influence Amendment (LAFCo File No. 09-10)

Date: September 27, 2010

To: Public Agencies and Interested Parties

From: Sacramento Local Agency Formation Commission (LAFCo)

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Elk Grove Sphere of Influence Amendment Project

Sacramento Local Agency Formation Commission (LAFCo) will be the Lead Agency and will prepare a Draft Environmental Impact Report (EIR) for the project identified below. The City of Elk Grove has submitted an application to LAFCo to amend its Sphere of Influence.

The project description, location, and probable environmental effects of the proposed City of Elk Grove Sphere of Influence Amendment (SOIA) are described in the attached materials. An Initial Study has not been prepared, and in accordance with the CEQA Guidelines Section 15060(d), Sacramento LAFCo has determined that an EIR will be required for the project. Therefore, Sacramento LAFCo is soliciting comments regarding the scope and content of the environmental information, which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering permitting or other approvals. Because of time limits mandated by state law, your response must be sent at the earliest possible date but not later than **30 days** after receipt of this notice.

Please provide your written response to the address shown below by **4:00 p.m., October 27, 2010**. In addition, kindly provide the name of a contact person in your agency.

Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814-2836
Attn: Mr. Don Lockhart, AICP, Assistant Executive Officer
Phone: (916) 874.6458
Fax: (916) 874.2939
Email: Don.Lockhart@saclafco.org

ELK GROVE SPHERE OF INFLUENCE AMENDMENT

1.1 - Project Location

The project area is generally located south-southwest of the existing City of Elk Grove boundaries (Exhibit 1). More specifically, the area to be included in the City's Sphere of Influence (SOI) is generally described as the areas south of Bilby Road, Kammerer Road, and Grant Line Road, extending south to Eschinger Road and Cosumnes River; east towards Cosumnes River and just past Freeman Road; and west towards Interstate 5 (I-5) and the Union Pacific Railroad tracks (Exhibit 2). The proposed boundary does not reach the Cosumnes River east of State Route 99 but follows the 100-year FEMA floodplain. The proposed SOIA area is located on the Elk Grove, California, United States Geological Survey 7.5-minute topographic quadrangle map,¹ Township 6 North, Range 5 East, Section 13 (Latitude 38°21'37" North; Longitude 121°23'02" West).

1.2 - Existing Conditions

Currently, the project area within the proposed Sphere of Influence Amendment (SOIA) boundaries is largely developed with agricultural uses. The existing land uses for the proposed SOI area are primarily agricultural and are determined by the Sacramento County (County) General Plan. The current land use and zoning designations, as defined by the County's General Plan and Zoning Ordinance, are described in Table 1 and Table 2.

Table 1: Existing Land Use

County General Plan Land Use	Acreage
Agricultural Cropland	5,645
Agricultural Cropland-RCA	463
Agricultural Residential	27
Commercial/Office	14
General Agriculture (20 acre)	1,521
Intensive Industrial	34
Low Density Residential	87
Natural Preserve	78
Total	7,869
Source: City of Elk Grove, Sphere of Influence Amendment Application, 2010.	

¹ The SOIA area is located in four different quadrants and various townships and ranges. This topographic description is a general representation of the project site.

Table 2: Existing Zoning

County Zoning	Acreage
A2 ^a	53
Agricultural-20 acres (AG20)	302
Agricultural-40 acres (AG40)	53
Agricultural-80 acres (AG80)	7,328
Agricultural Residential-2 acres (AR2)	18
Agricultural Residential-10 acres (AR10)	50
Limited Commercial zone (LC)	8
Heavy Industrial (M2)	20
Single Family Zone (R-1-A)	35
RR	2
Total	7,869
Notes: ^a Multiple zoning designations: Agricultural-40 acres (AG40), Agricultural-80 acres (AG80) Source: City of Elk Grove, Sphere of Influence Amendment Application, 2010.	

1.3 - Project Description

The proposed project consists of an application to Sacramento Local Agency Formation Commission (LAFCo) to amend the City of Elk Grove's SOI. The current SOI is coterminous with the City boundary. The amended SOI would include an additional 7,869 acres generally described as the areas south of Bilby Road/Kammerer Road and Grant Line Road, as shown in Exhibit 2. Current land use projections indicate that future growth will require additional lands outside of the city boundary.² The City's available residential, industrial, and commercial land inventory is in the process of building out and may be unable to accommodate all anticipated growth within the City. As a result, the City needs to establish a direction to accommodate its anticipated future growth by defining the area for long-term planning. No specific land use developments are proposed at this time in conjunction with this proposed SOIA. The City may begin comprehensive planning of the area after the approval of the SOIA.

Nearby communities of interest include the communities of Bruceville, Old Town Franklin, Point Pleasant, and Wilton. Bruceville and Point Pleasant are south of the proposed SOIA area. Old Town Franklin is immediately adjacent to the City and is included within the proposed SOIA area. Wilton is located across the Cosumnes River outside of the proposed SOIA area.

The City of Elk Grove and the County of Sacramento are working collaboratively to establish a Memorandum of Understanding (MOU) that would incorporate the "joint vision" shared between the

² City of Elk Grove, Sphere of Influence Amendment Application. Please reference 8/26/10 application LAFC No. 09-10.

City and County regarding the future planning and preservation activities within the City's proposed SOI area.

1.3.1 - Proposed General Plan and Zoning

The City's General Plan designates the proposed area as the Urban Study Area. The Urban Study Area designation envisions the 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 rezoning is proposed or required at this point. Current land uses are anticipated to remain the same until such land planning occurs, and a prezone and annexation application is approved.

1.4 - Project Background

Over the course of 2007, the City Council initiated the process of comprehensively planning the Urban Study Areas as outlined in the City's General Plan. The initially identified boundary for the City's SOI was the same as the Urban Study Area boundary extending south of the existing City limits to the edge of the 100-year flood plain boundary. However, prior to submitting its application to LAFCo, the City discussed the proposed boundaries, development standards, and planning and zoning requirements with the County, pursuant to Government Code Section 56425(b). The City complied with this requirement by meeting with County staff during four city-county meetings between December 2007 and February 2008. During the meetings, the City and County staff discussed a number of mutual concerns, including lands needed to accommodate projected growth, drainage and flooding issues, future growth outside of the 100-year floodplain, infrastructure and municipal services, open space, agricultural users, and coordination with the South Sacramento Habitat Conservation Plan (SSHCP). Based on the discussions, the SOI boundaries were then amended to the proposed SOIA boundaries extending only as far as Eschinger Road to the south.

The proposed SOIA includes the area that connects to I-5 at the Hood-Franklin interchange. This area was not included in the Urban Study Area, but it is included in the proposed SOIA because it will serve as a logical gateway from I-5 to the City, with portions of this area likely to urbanize.

A draft MOU was previewed by the City Council on November 18, 2009 and by the Board of Supervisors on December 2, 2009. The draft MOU and Joint Vision documents were presented to the public through four public outreach meetings in March 2010. The Final MOU is still in the process and will be available at a later date.

1.5 - Required Approvals and Intended Uses

The proposed project would require the following discretionary approvals and actions:

- Sphere of Influence Amendment –Sacramento Local Agency Formation Commission

In the event of various subsequent land use entitlements, various local, state, or federal approvals or permits may be necessary, pursuant to applicable laws and regulations.

1.6 - Environmental Review

1.6.1 - Potential Environmental Effects

Sacramento LAFCo has reviewed the proposed project, as described in Section 15060 of the CEQA Guidelines, and determined that an EIR should be prepared. Based on this preliminary review, Sacramento LAFCo has identified that the EIR will analyze the potentially significant adverse environmental effects of the proposed SOIA. The following environmental issues will be evaluated in the EIR:

Aesthetics – The EIR will evaluate the existing aesthetics, light, and glare conditions within the proposed SOIA boundaries and evaluate potential impacts that may occur from future development and land use activities contemplated by the City of Elk Grove.

Agriculture – The EIR will evaluate the conversion of agricultural land to urban uses and will identify any indirect impacts on surrounding agricultural lands, such as potential land use conflicts and the potential to induce future conversion of surrounding agricultural land to urban uses.

Air Quality – The EIR will include a discussion of the regional and local air quality setting, and current air quality management efforts such as the City’s Climate Action Plan. The setting will include the environmental and regulatory setting for air quality, including state and regional emissions inventories, legislation, guidance, and programs.

Greenhouse Gas Emissions – The EIR will include a discussion of the potential for increased greenhouse gas emissions within the context of AB 32 and SB 375, which require the California Air Resources Board (ARB) to set regional targets for the purpose of reducing greenhouse gas emissions from passenger vehicles for target years 2020 and 2035. In addition, the discussion would include the Climate Change Scoping Plan adopted by ARB, which provides sector-specific, emission reduction measures and goals.

Biological Resources – The EIR will evaluate the proposed SOIA and its relationship with the South Sacramento Habitat Conservation Plan (SSHCP), and determine what species will need to be managed and how those resources will be monitored within the confines of the proposed SSHCP. Given the proximity of Preserve and Refuge lands, agricultural lands within the proposed SOIA provide foraging habitat for a number of species, including the State-listed as threatened Swainson’s hawk, which nests in mature riparian habitat along the Cosumnes River and forages in grasslands and row crop habitats. The potential for occurrence of special-status plant or wildlife species will be evaluated, based on existing information, and the presence of any habitats considered sensitive and/or tracked by the California Natural Diversity Database (CNDDB), such as riparian and oak woodland, or by the U.S. Army Corps of Engineers will be documented.

Cultural Resources – The EIR will include a cultural resource impact assessment. The EIR will describe the existing cultural resources on the project site and affected offsite areas, and will evaluate the potential impacts on these cultural resources, including the potential to affect undiscovered resources. The EIR will also include consultation with California Native American tribes to assess potential impacts that could result from the proposed SOIA.

Geology and Soils – The EIR will evaluate the geologic, soil, and seismic conditions within the proposed SOIA and evaluate potential impacts that may occur from future development and land use activities contemplated by the City of Elk Grove.

Hazards and Hazardous Materials – The EIR will identify potential hazards and hazardous materials on properties within the proposed SOIA boundaries, review agency hazardous materials databases, and conduct limited site reconnaissance if necessary. The EIR will evaluate the proposed SOIA's potential hazards and hazardous materials impacts and recommend mitigation measures where necessary.

Hydrology and Water Quality – The EIR will evaluate the hydrologic and water quality conditions within the proposed SOIA boundaries and evaluate potential impacts that may occur from future development and land use activities contemplated by the SOIA. The proposed SOIA boundary does not include lands located within the 100-year floodplain east of State Route 99 and along the Cosumnes River.

Land Use and Planning – The EIR will evaluate the consistency of the Sacramento County General Plan land use designations with the land use designations of the City of Elk Grove General Plan for the proposed SOIA. Additionally, the EIR will evaluate other adopted land use plans and policies, such as habitat conservation plans, agricultural preservation plans, specific plans, community plans, and any other relevant planning and land use documents that have a bearing on the proposed SOIA.

Mineral Resources – The EIR will evaluate the potential for development and land use activities contemplated by the City of Elk Grove to interfere or restrict mineral extraction operations or the availability of such resources.

Noise – The EIR will describe the potential construction and operational noise impacts and will compare these impacts with applicable noise thresholds.

Population, Employment, and Housing – The EIR will evaluate impacts on population and housing. Of particular concern is the potential for future development within the proposed SOIA to induce substantial direct population growth that exceeds the projections of either the Sacramento County General Plan or the Sacramento Area Council of Government's population forecasts.

Public Services and Recreation – The EIR will incorporate the determinations of the concurrently prepared Municipal Services Review for the proposed SOIA Area that was submitted with the City's 8/26/10 application (LAFC No. 09-10). The EIR will also evaluate

existing public service and recreation facilities and service levels within the SOIA boundaries and evaluate potential impacts that may occur from future development and land use activities contemplated by the SOIA Application. This review will include potential impacts to any affected special districts.

Utilities – The EIR will evaluate existing utility systems within the proposed SOIA boundaries and evaluate potential impacts that may occur. Of particular concern is the availability of potable water (Sacramento County Water Agency Zone 41, Elk Grove Water Works, and Omochumne-Hartnell Water District, and private wells) and wastewater services, collection and treatment (Sacramento Regional County Sanitation District) and Sacramento Area Sewer District (SASD) to the General Plan area.

Transportation – The EIR will evaluate potential impacts on local and regional transportation facilities, including several freeway segments and ramps. Issues of concern will include impacts on intersection and roadway operations, parking, public transit, bicycles, and pedestrians.

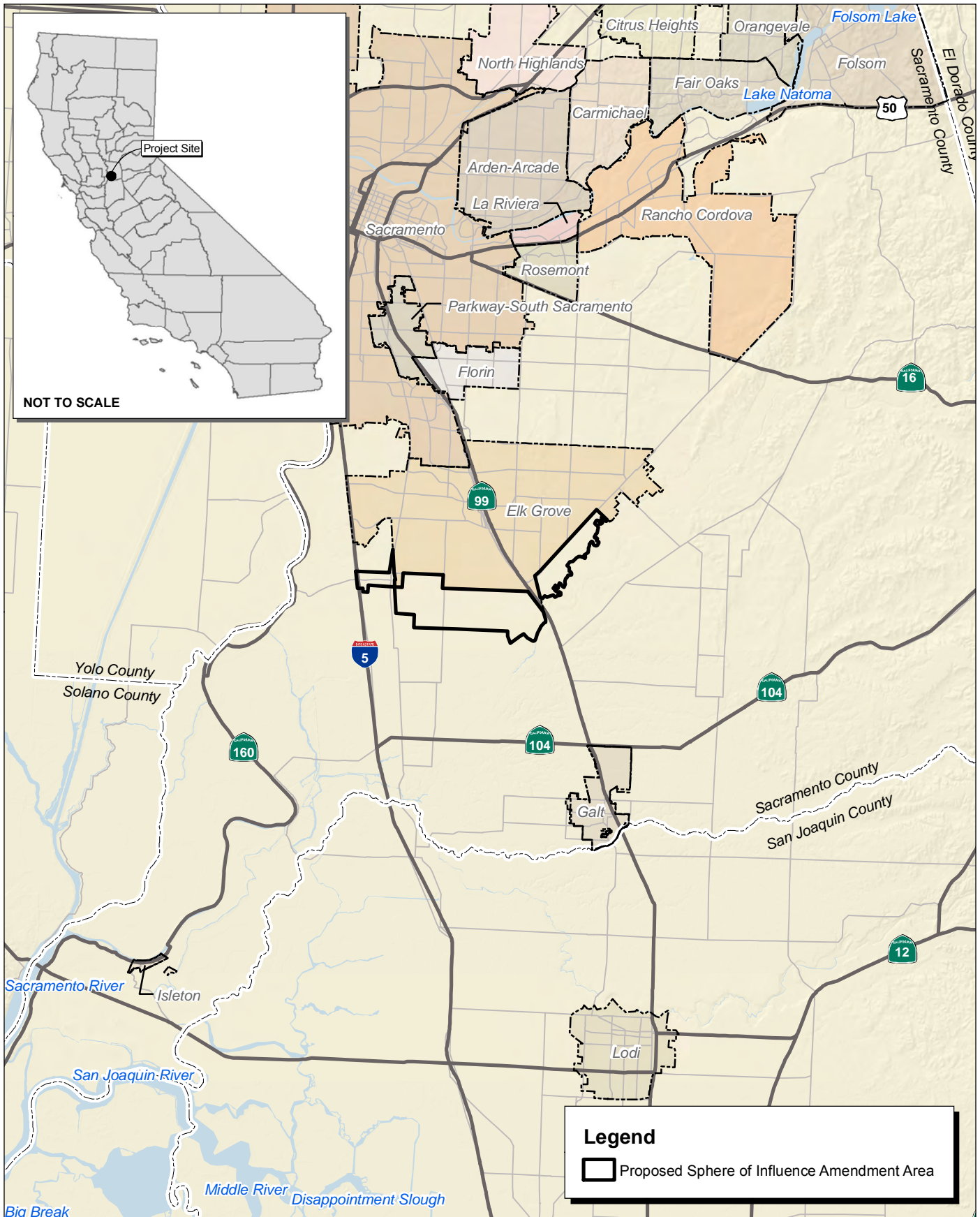
The EIR will analyze all of these issues and provide a determination of impact significance. At present, Sacramento LAFCo lacks sufficient information to make conclusive determinations on significance. Sacramento LAFCo will consider the written comments received in response to this Notice of Preparation in determining the topics and scope to be assessed in the Draft EIR.

1.7 - Scoping Meeting

A public scoping meeting will be held at **6:30 p.m., Tuesday, October 26, 2010**, at the following location:

City of Elk Grove
City Council Chambers
8400 Laguna Palms Way
Elk Grove, CA, 95758

At this meeting, agencies, organizations, and members of the public will be able to review the proposed project and provide comments on the scope of the environmental review process.



Source: Census 2000 Data, The CaSIL, MBA GIS 2010.

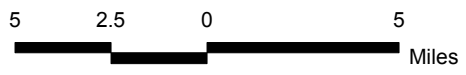
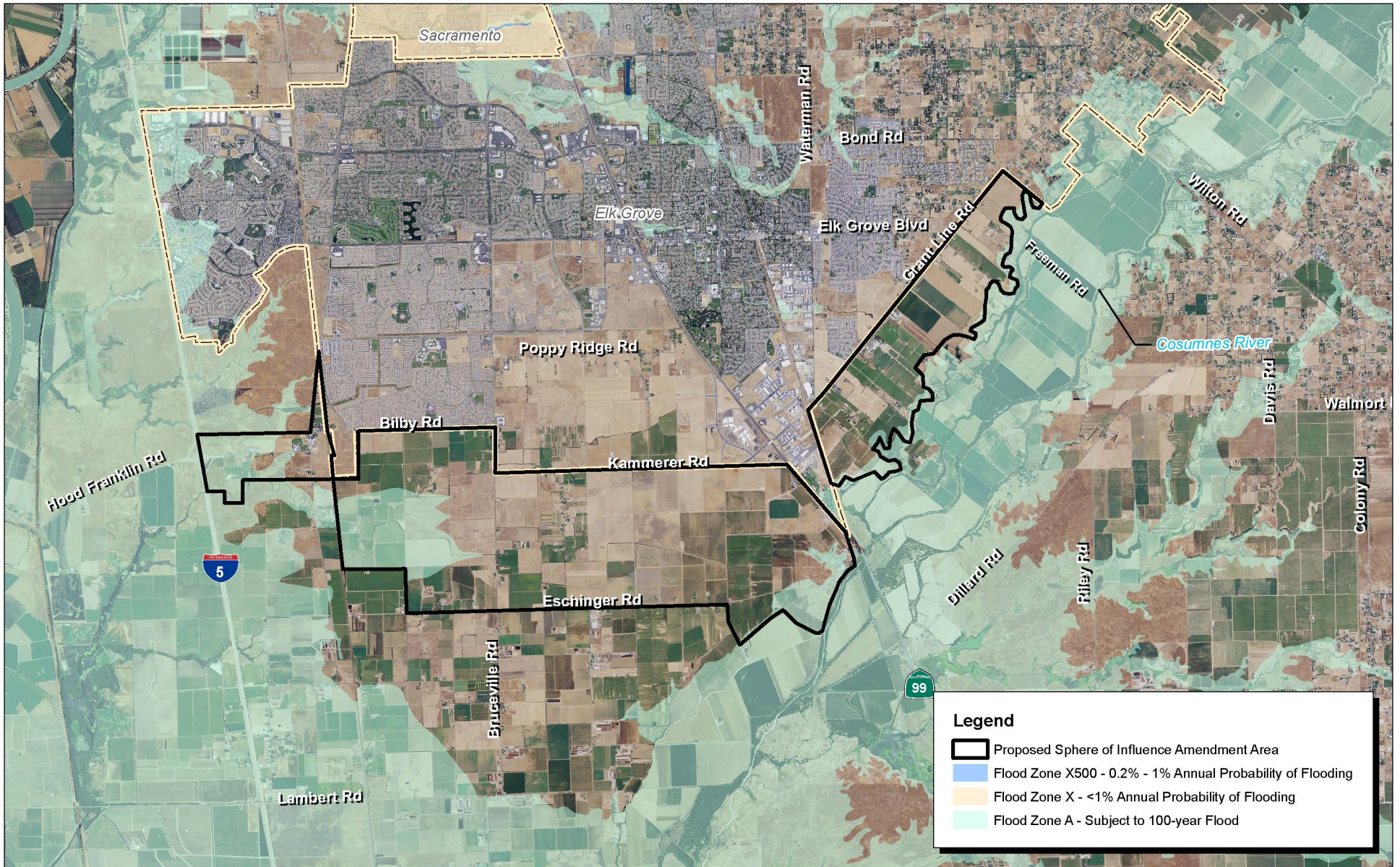


Exhibit 1 Regional Location Map



Source: Sacramento County NAIP, 2009, County of Sacramento, City of Elk Grove, 2009. FEMA MSC and Q3 Data.

Legend





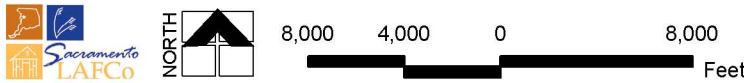
-  Proposed Sphere of Influence Amendment Area
-  Flood Zone X500 - 0.2% - 1% Annual Probability of Flooding
-  Flood Zone X - <1% Annual Probability of Flooding
-  Flood Zone A - Subject to 100-year Flood

Exhibit 2 Local Vicinity Map Aerial Base



Municipal Services Agency

Department of Waste
Management & Recycling
Paul Philleo, Director



**County of
Sacramento**

Terry Schutten, County Executive
Paul J. Hahn, Administrator

RECEIVED

JUL 14 2010

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

Date: July 30, 2008

To: Bob Davison, Infrastructure Finance Section
From: Paul Philleo, Director, Department of Waste Management and Recycling
Subject: City of Elk Grove Sphere of Influence Amendment Request (LAFC 04-08)

Sacramento County Waste Management and Recycling staff have reviewed the July 1, 2008 memorandum from the Sacramento Local Agency Formation Commission (LAFCo) for this request. Staff has also reviewed the accompanying material submitted by the City of Elk Grove to LAFCo in support of its request. Our Department has the following comments.

The Department of Waste Management and Recycling provides residential solid waste collection services in the area through a South Area Collections Contract. The contractor is Central Valley Waste Services, based in Lodi. The requested Sphere of Influence lies within this South Area. Billing of residential customers is conducted through the Coordinated Utility Billing Service.

While the number of customers in the area currently is relatively small, numbering only about 100, it is an area of the unincorporated County planned for growth from which the department would see a loss of business. The provision of residential solid waste collection service, for which our Departmental customer service has been highly commended, currently generates \$18.24 to \$28.16 in revenue for the County per household per month, depending on level of service.

The County is also a partner with the City of Sacramento in a Joint Powers Authority, the Sacramento Regional Solid Waste Authority, or SWA. The SWA administers a franchised system of commercial solid waste collection. Franchisees are charged a fee of 8% of gross collection revenue. Currently SWA franchise system revenues are approximately \$3.9 million, out of which approximately \$1.5 million is contributed to the County General Fund, after administrative expenses and equitable sharing with our City partners. The number of commercial accounts in the area is similarly small now but commercial growth is very likely along the Highway 99 corridor and the SWA, and thus the County, would be impacted in the event that the area is ultimately annexed.

Projections of the revenues are premature and likely to be inaccurate but the financial impact will be significant.

Please let me know if you need additional information.

DEPARTMENT OF TRANSPORTATION
DISTRICT 3 – SACRAMENTO AREA OFFICE
VENTURE OAKS, MS 15
P. O. BOX 942874
SACRAMENTO, CA 94274-0001
PHONE (916) 274-0635
FAX (916) 274-0648
TTY (530) 741-4509



*Flex your power!
Be energy efficient!*

August 22, 2008

08SAC0152
03 SAC-5/99 P.M. 8.493/8.960
City of Elk Grove Sphere of Influence Amendment
South of Kammerer Road (LAFC #04-08)
Early Consultation/Application

Mr. Peter Brundage, Executive Officer
Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

Dear Mr. Brundage:

Thank you for the opportunity to review and comment on the City of Elk Grove Sphere of Influence (SOI) Amendment application. The SOI amendment includes 10,536 acres south of Bilby Road/Kammerer Road and Grantline Road, extending south to Eschinger Road and the Cosumnes River, east towards the Cosumnes River and just past Freeman Road, and west towards Interstate 5 and the Union Pacific Railroad tracks. Our comments are as follows:

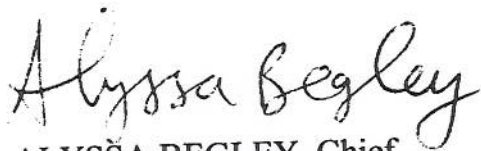
- Caltrans primary concern involving the proposed SOI is ensuring that transportation mobility is maintain, especially within the Interstate 5, State Route 99, and State Route 16 corridors which may be most directly affected by future development in the SOI area. An appropriately timed analysis of what highway, bus, rail, bicycle and pedestrian infrastructure improvements are necessary to serve the larger SOI area is needed.
- Funding structures for transportation improvements should be developed to make certain that the necessary transportation infrastructure can be built in concert with the future proposed land uses.
- When future land use decisions are made in the SOI area, the development should incorporate mixed-use design, a jobs-housing balance, and smart growth tenets which balances the use of transportation modes and reduces reliance on single occupant vehicle trips.

Mr. Peter Brundage
August 22, 2008
Page 2

- Caltrans can assist with the identification of potential impacts to the State Highway System resulting from future development proposals in the area and work in concert with the appropriate jurisdiction, agency, or transportation provider to develop and implement transportation projects that will assure mobility for travelers.

If you have any questions regarding these comments, please contact Ken Champion at (916) 274-0615.

Sincerely,



ALYSSA BEGLEY, Chief
Office of Transportation Planning – South

cc: Christine Crawford, City of Elk Grove Planning

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

South Sacramento Area - 252
6 Massie Court
Sacramento, CA 95823
916-681-2300
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)



September 23, 2010

File No.: 252.011718.SacLAFCO

RECEIVED

SEP 27 2010

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814
Attention: Mr. Peter Brundage, Executive Officer

RE: Elk Grove Sphere of Influence Amendment – 2010 Revised Application

Dear Mr. Brundage:

I am writing in response to your September 13, 2010 *Affected Agency/Interested Party* letter, regarding the Elk Grove Sphere of Influence Amendment – 2010 Revised Application. Included below are the responses you requested, supplied on behalf of the California Highway Patrol's South Sacramento Area Office:

1. *What official position, if any, has your agency taken on this proposal?*

None.

2. *If the proposal includes the detachment of territory from your agency:*

How will the proposal affect the ability of your agency to continue to provide services in the territory not included in the proposed change of the organization?

No affect.

How will the proposal affect the financing and operation of your agency?

No affect.

Thank you for soliciting our input on this matter. Please continue to include us on your parties of interest list for future contact. If you have any question, please feel free to contact me or Lieutenant Michael Richard of my staff at (916) 681-2300.

Sincerely,

A. R. Jones, CAPTAIN
Commander



RECEIVED

SEP 27 2010

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

September 24, 2010

Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

RE: Elk Grove Sphere of Influence Amendment – 2010 (09-10)

This proposal will not affect our organization.

Regards,

Thomas S. Bartlett, CPA, Finance Manager



RECEIVED

OCT 07 2010

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

October 1, 2010

Peter Brundage, Executive Officer
Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

Subject: Elk Grove Sphere of Influence Amendment – 2010 (09-10) Revised Application

Dear Mr. Brundage:

The Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Area Sewer District (SASD) have reviewed the City of Elk Grove Sphere of Influence Amendment Revised Application and have the following comments:

Sewer Service

Local sewer service for the City of Elk Grove is provided by SASD. Conveyance from the local SASD trunk lines to the Sacramento Regional Wastewater Treatment Plant (SRWTP) is provided by SRCSD through large pipelines called interceptors.

The SASD sewerage facilities Master Plan Update 2006 provides information regarding sewer trunk lines for both relief and expansion projects and is the only master planning document for SASD. Currently, SASD is in the process of creating the SASD 2010 Sewer System Capacity Plan Update which will update the previous 2006 Master Plan Update. This 2010 Update is anticipated to be completed in Fall 2011.

In general (with the exception of Folsom and West Sacramento), both the SASD and SRCSD Spheres of Influence (the service area officially defined for future planning purposes) correspond to the Sacramento County Urban Services Boundary (USB). The SRCSD ISS, along with the SASD 2010 Sewer System Capacity Plan Update are studying the areas that lie outside the USB (and therefore outside it's SOI) to determine potential impacts areas such as these may have should the appropriate land use authorities allow for future development; however, neither SASD nor SRCSD can actively plan for these areas until annexation occurs. The areas of the Elk Grove SOI expansion that are located outside the SASD and SRCSD service areas will need to be annexed

Technology in balance with nature

Main Office

10060 Goethe Road
Sacramento, CA 95827-3553
Tele: [916] 876-6000
Fax: [916] 876-6160

Sacramento Regional Wastewater Treatment Plant

8521 Laguna Station Road
Elk Grove, CA 95758-9550
Tele: [916] 875-9000
Fax: [916] 875-9068

Board of Directors Representing:

County of Sacramento

County of Yolo

City of Citrus Heights

City of Elk Grove

City of Folsom

City of Rancho Cordova

City of Sacramento

City of West Sacramento

Stan R. Dean
District Engineer

Prabhakar Somavarapu
Director of Policy and Planning

Ruben R. Robles
Director of Operations

Marcia Maurer
Chief Financial Officer

Claudia Goss
Director of Communications

through LAFCo to receive sewer service. This process should be initiated by the City of Elk Grove, not SASD or SRCSD.

The following areas are currently located in the SASD service area and identified within the 2006 SASD Master Plan Update:

The portion of the area Southeast of Grant Line Blvd. that is located within the USB will be served by the EG Elk Grove East Trunk Sheds. The EGO-1 trunk shed in this area is scheduled to be evaluated for possible construction between 2011 – 2020, with the EGO-2 Trunk Shed to be evaluated for possible construction after 2020.

The area North of Bilby Road will be served by the SO East Franklin Trunk Shed. The trunk line that will serve this area is tentatively scheduled to be evaluated for possible construction prior to 2011.

Financial

A certificate of compliance must be obtained from the Sacramento Area Sewer District and Sacramento Regional County Sanitation District before permit issuance. This certification must include a payment receipt for the sewer impact fees paid or a letter indicating the reason for exemption. Any additions or corrections to the project will require an amendment to the Certificate of Compliance.

Recycled Water Service

SRCSD and SCWA have a joint water recycling program to produce, wholesale, and retail recycled water to select areas. Recycled water is produced by the SRCSD and wholesaled to SCWA and used for non-potable purposes (such as irrigation and landscaping). Recycled water is used in portions of Laguna West, Lakeside, and Stone Lakes communities located within the City of Elk Grove. Water demand is met by groundwater and surface water supplies and a small amount of recycled water.

Municipal Services Review Comments

On page 4.0-11, it states that the SASD service area is divided into ten trunk sheds. This should be revised to state that *within the City of Elk Grove, the SASD service area is divided into ten trunk sheds.*

Page 4.0-12, paragraph 3 states that SRCSD is currently implementing large scale improvements of the regional interceptor system to correct existing deficiencies. Please revise to state that *SRCSD is in the process of completing an Interceptor Sequencing Study that will provide general information about the best way to serve this region.*

On page 4.0-12, Wastewater Treatment, it states that SRCSD is in the process of expanding the Sacramento Regional Wastewater Treatment Plant (SRWTP) to accommodate 250 MGD of ADWF. Please remove this statement as SRCSD has withdrawn the previous request to increase flow capacity to 218 MGD; therefore this statement is no longer valid.

Page 4.0-12, Wastewater Treatment, also states that current ADWF for the SRTWP is 165 MGD. Please revise to state *current ADWF for the SRWTP is 145 MGD.*

Page 4.0-12, Wastewater Treatment, second paragraph states that water recycling is a compliance strategy currently being used by SRCSD. Please revise to state *water recycling is a potential effluent management option for the SRCSD.*

Page 4.0-15, The Sacramento Regional County Sanitation District: Please add to the list of documents used to guide wastewater facilities in Sacramento county the *Water Recycling Opportunities Study (WROS), February 2007. The WROS explores potential opportunities for the possible implementation of recycled water projects within different areas of the Sacramento Region, including the Elk Grove Area.*

Page 4.0-16, Sacramento Area Sewer District, Second bullet discusses the Sacramento Area Sewer District Rehabilitation Master Plan. Please remove this bullet as this document does not exist.

If you have any questions regarding these comments, please contact me at (916) 876-9994.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarena Deeble", with a long horizontal flourish extending to the right.

Sarena Deeble

SRCSO/SASD

Policy and Planning

CC: Michael Meyer, SRCSD Development Services, SASD Development Services, Jim Edwards, Prabhakar Somavarapu, Robert Seyfried, Jose Ramirez



Members of the Board:

Jeanette J. Amavisca
Pollyanna Cooper-LeVangie
Priscilla S. Cox
Pamela A. Irely
William H. Lugg, Jr.
Chet Madison, Sr.
Al Rowlett

Robert Pierce
Associate Superintendent
Facilities and Planning

Robert L. Trigg Education Center, Room 206
9510 Elk Grove-Florin Road, Elk Grove, CA 95624

(916) 686-7711
FAX: (916) 686-7754

RECEIVED

OCT 13 2010

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

October 8, 2010

Mr. Peter Brundage, Executive Officer
Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

Subject: City of Elk Grove Sphere of Influence Amendment Request

Dear Mr. Brundage,

Please accept this letter as the Elk Grove Unified School District's response to your September 13, 2010 letter regarding the Elk Grove Sphere of Influence Amendment (SOIA).

This matter was discussed by our Governing Board on October 5, 2010. During the discussion the Governing Board chose to take no action on the matter and is therefore neither opposed nor supportive of the project.

Although approval of the SOIA project would not change the District's boundaries, mission, or obligations it is clear that any future actions leading to modifications of the subject area's land use designations would have a direct impact on the District. However, it is the District's understanding that the SOIA does not include any proposal for land use designations or development changes. As a result we are unable to quantify or comment on how any land use changes occurring after the potential SOIA would impact the District.

It is critical to note that any future residential development in the subject area has not been considered in the District's long range facilities master plan and would therefore have a negative effect on the district's existing school facilities. Therefore it is imperative, no matter whose influence the area is under, that the District be included in any future discussions regarding land use changes and development in the area. This will ensure that proper school sites, facilities, and education are provided to future families that may reside in the area.

If you have any questions, please call me at 916-686-7711. Thank you.

Sincerely,

Robert Pierce
Associate Superintendent, Facilities and Planning

Thorpe. Diane

From: Winter. Mike (MSA)
Sent: Wednesday, October 13, 2010 2:57 PM
To: Thorpe. Diane
Subject: Elk Grove SOI Information Request
Attachments: Responses to LAFCO survey on the Revised Elk Grove SOI Application.docx

RECEIVED

OCT 13 2010

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

Diane,

I have attached a list with the answers to the information requested related to the Elk Grove SOI. We didn't have easily available population numbers, but can generate them if necessary. Also, I have yet to contact our staff person working on the South Sacramento HCP. I may send a brief statement tonight related to the HCP.

I am leaving the office for the day in a few minutes, but I will be in tomorrow should you have any questions.

Mike

Michael Winter, Planner III

Planning and Community Development Department
827 7th Street, Room 230, Sacramento, CA 95814 | Office: (916) 874-6141 | Desk: (916) 874-5849 | Fax: (916) 874-7499 | E-mail: Winterm@SacCounty.net | www.planning.saccounty.net

Please note that the Planning Department Public Information Counter is open part-time. Please see our website for new hours

10/14/2010

RECEIVED

OCT 13 2010

Responses to LAFCO Information request on the Revised Elk Grove SOI Application

October 13, 2010

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

I. General Data

- A. Current Population *Mostly low density agriculture. Can provide a value based on census tract data, upon request.*
- B. Projected 5-year pop *No significant change anticipated.*
- C. General Plan LU category *Mostly agricultural with small amounts of commercial/office, Intensive Industrial, low density residential & natural preserve.*
- D. Comm/Sp Plan LU Desig? *None*
- E. Land Use Zone *Primarily Ag, with small amounts of Limited Commercial, Heavy Industrial, Single Family & RR.*
- F. Community Location *N/A*
- G. Potentially affected, or Adjacent communities. *Franklin and Wilton*
- H. Pending Applications
- 1. On-site *None*
 - 2. Project Vicinity *None*
- I. Recent or significant Approved Projects
- 1. On-site *None*
 - 2. Project Vicinity *None*
- J. Other significant projects, Studies or Project Denials
- 1. On-site *Sunset Sky Ranch Airport (Denial)*
 - 2. Project Vicinity *None*
- K. Significant site problems *Potential farmland and habitat losses*

II. PROJECT CHARACTERISTICS AND IMPACT

- | | |
|--|---|
| 1. SOI consistent with GP, etc.? | <i>No, to the extent that urbanization would occur under the SOI.</i> |
| SOI inconsistent with other plans? | <i>N/A</i> |
| 2. Previous project controversy? | <i>N/A</i> |
| 3. SOI to alter population? | <i>Significant increase in population density.</i> |
| 4. Current vacant non-prime avail. for urbanization? | <i>Yes</i> |
| 5. Will Proposal encourage non-contiguous development? | <i>No</i> |
| 6. Is vacant land available for infill. | <i>Yes</i> |
| 7. Is there prime Ag land on site? | <i>Minor amounts</i> |
| 8. Are there areas of "open space"? | <i>No preserve areas.</i> |
| Area in Gen./Sp Plans as OS or Rec? | <i>No. Western portion in Resource Conservation Area.</i> |
| 9. Reduction of SOI area appropriate? | <i>No</i> |
| 10. Any important conditions from previous approvals? | <i>None</i> |
| 11. Previous approvals with FFSOC? | <i>None</i> |

Lockhart. Don

From: Brundage. Peter
Sent: Monday, October 18, 2010 1:31 PM
To: Lockhart. Don
Subject: FW: Elk Grove SOI DEIR NOP - Sac Co DWMR comments
Attachments: ElkGrove SOLamend 080408.pdf

From: Ghirardelli. David (MSA)
Sent: Monday, October 18, 2010 1:01 PM
To: Brundage. Peter
Subject: Elk Grove SOI DEIR NOP - Sac Co DWMR comments

Hello Peter -- Sacramento County Department of Waste Management and Recycling has no further comment on the revised application for this project other than to refer you to our previous comments dated July 30, 2008. Those comments are also attached for your reference.

Thanks and please contact me if you need any more information.

Dave Ghirardelli
Sacramento County DWMR
875-4557

10/29/2010

October 26, 2010

SENT VIA EMAIL

Mr. Don Lockhart
Assistant Executive Officer
Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

**RE: City of Elk Grove Sphere of Influence Amendment Notice of Preparation
(LAFCo No. 09-10)**

Dear Mr. Lockhart:

The Sacramento Metropolitan Air Quality Management District (District) appreciates the opportunity to provide the following comments on the City of Elk Grove Sphere of Influence Amendment Notice of Preparation (NOP).

The outline of potential environmental effects in the NOP that are to be evaluated in the Draft Environmental Impact Report touches on the topics that are important for the District and the air quality of the region. The District supports and strongly encourages a close look at all aspects of air quality and greenhouse gases as outlined with particular attention to the legislative mandates that are currently undergoing development at the state level. In addition, I want to emphasize the importance of looking at these environmental effects in the context of the current SACOG 2035 Metropolitan Transportation Plan and the 8-hour Ozone State Implementation Plan (SIP).

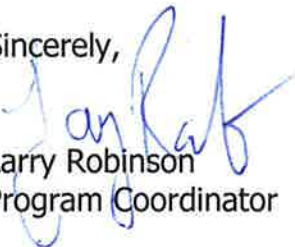
The 8-hour Ozone SIP, completed in December 2008, incorporates all transportation and growth projections found in the current 2035 MTP which assumed that all growth in the time horizon could be accommodated within the existing Elk Grove boundaries. As previously commented (August 14, 2008), the importance of this growth projection is that the proposed growth to Elk Grove represented by the proposed SOI area is not included as a component of the land use assumptions underlying those plans. With that in mind, we look forward to the Draft Environmental Impact Report (DEIR) and the mitigation measures that will address this important concern.

In addition to other mitigation measures being vetted through the Elk Grove SOI environmental process I urge the Commission to consider a 35% operational performance standard. This standard has been proposed and/or required in other

growth areas of Sacramento County, including North Natomas, Folsom and Galt. The measure will require a 35% reduction of operational emissions for all projects in the proposed expansion area; however, it will not fully mitigate the air quality impacts of this SOI expansion but will only partially offset them.

Thank you for your consideration of these comments and I look forward to receiving the DEIR for review. Any questions regarding these comments can be directed to my Charlene McGhee of my staff at cmcghee@airquality.org or 916.874.4883.

Sincerely,



Larry Robinson
Program Coordinator

c: Taro Echiburu, Interim Planning Director, City of Elk Grove
Charlene McGhee, Associate Air Quality Planner, Sacramento Metropolitan AQMD

Municipal Services Agency

Department of Environmental
Review and Assessment

Joyce Horizumi, Director



Steven C. Szalay, Interim County Executive
Nav Gil, Chief Operations Manager

October 26, 2010

Donald J. Lockhart, AICP
Assistant Executive Officer
Sacramento Local Agency Formation Commission
1112 "I" Street, Suite 100
Sacramento, CA 95814

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Elk Grove Sphere of Influence Amendment

Dear Mr. Lockhart:

Sacramento County has reviewed the subject NOP and provides the following responses.

Teresa Mack, Senior Civil Engineer, Infrastructure Finance Section, Development and Surveyor Services Division, Department of County Engineering:

The territory proposed for the Elk Grove SOI is within the Cosumnes Community Services District (CCSD). The CCSD includes territory in both the City of Elk Grove and the County. The CCSD implemented a development impact fee to fund capital improvements for Fire Services. The County collects the CCSD Fire Fee in the unincorporated area of the County and the City of Elk Grove collects the CCSD Fire Fee in the City. In the event that territory within the CCSD is annexed into the City, the CCSD and the City would have to make arrangements for the collection of the Fire Fee in the annexed territory.

There are no other districts administered by the Infrastructure Finance Section that are within the proposed Elk Grove SOI territory.

Matt Darrow, Senior Civil Engineer, Department of Transportation:

The Department of Transportation has reviewed the NOP for the SOI Amendment. We previously submitted a letter dated July 30, 2008. Some of the contents of that letter are reiterated here.

We would request that the traffic impacts be studied and mitigation identified on all affected County roadway and intersection facilities. The impacts should not be determined to be

significant and unavoidable because of newly formed jurisdiction lines.

It is not clear at this time if the maintenance and operations of any County roadway facilities would be affected by this proposal. If so, the County would request that any financial impact to its roadway programs be rectified.

If any joint roadway maintenance facilities exist that will be affected by this proposal then agreements as to who will be financially responsible for maintenance and operations of the roadways should be made. This should be coordinated with the Maintenance and Operations Division of the Department of Transportation.

Please coordinate these efforts regarding the functionality and access of the future connector with Tom Zlotkowski, the Executive Director of the Elk Gove-Rancho Cordova-El Dorado Connector JPA.

We appreciate the opportunity to review this document. If you have any questions, please call me at 874-6291.

Mike Peterson, Principal Civil Engineer, Department of Water Resources:

The amended SOI area is proposed to remain outside of the 100-year floodplain south of Grant Line Road. Exhibit 2 of the Notice of Preparation depicts a 100-year floodplain (shaded green) which is incorrect. However the proposed boundary of the SOI area along the Cosumnes River floodplain appears to coincide with the current FEMA 100-year floodplain. Current 100-year floodplain map information is available from the County Department of Water Resources and should be reflected in the DEIR.

County - Drainage

Approval of the SOI would not result in a change in services provided by the County to the SOI area and would not significantly affect the financing of County drainage services. The SOI area is outside of the County Stormwater Utility. However, should this area be annexed to the City of Elk Grove in the future, the County would no longer review development projects in the SOI area for conformance with County development and floodplain standards and would no longer be responsible for administering the requirements of the joint NPDES permit in the SOI area. Additionally, the County would not provide flood control, drainage maintenance, flood response, floodplain management, improvement plan review or other County drainage related services to the SOI area.

Sacramento County Water Agency - Drainage

Approval of the SOI would not result in a change in drainage services provided by the Sacramento County Water Agency and would not significantly affect the financing of SCWA drainage services provided by SCWA Zone 11A and Zone 13. The majority of the SOI area is outside of SCWA Zone 11A. The entire SOI area is within SCWA Zone 13. Should the SOI area be annexed to the City of Elk Grove in the future, SCWA would continue to administer the Zone 11A drainage developer fee program for the funding of development trunk drainage facilities within the Zone and the SCWA Beach Stone Lake Flood Mitigation Fund, but would no longer provide drainage plan review or floodplain management services. The SCWA would continue to provide Zone 13 drainage services.

The SCWA currently collects the Beach Stone Lake Flood Mitigation Fund from developments within Zone 11A to provide funding for a future project(s) to mitigate flood volume impacts in the Beach Stone Lake-Point Pleasant area. If the SOI area is to annex to the City of Elk Grove in the future, the City should be required to establish a similar program to fund or contribute to this mitigation. The DEIR should address this issue in conjunction with future development and land use activities contemplated in the SOI amendment.

Please contact me if you have any questions at 874-8913.

Terry Kociemba, Environmental Health Specialist, Environmental Management Department:

Septic Systems

Existing agricultural and rural residential land uses are served by individual septic systems. Major portions of the SOI Amendment area not served by a public wastewater service are served by private septic systems. The Sacramento County Environmental Management Department (EMD) provides mandated regulatory services in food service, hazardous materials, solid waste facilities and septic service. Conventional septic systems use seepage pits of varying depths. The standard pit depth in the area is 35 feet.

Planning and Environmental Issues (Antonia Barry, Principal Environmental Analyst, DERA and Leighann Moffitt, Interim Planning Manager, Planning Department

The EIR should provide a discussion of the following land use issues:

- Evaluation of land uses in the floodplain
- Impacts to properties with conservation easements
- Relationship of the SOI in regard to the South Sacramento Habitat Conservation Plan. What SOI projects would be mitigated by the SSHCP? How will resources be mitigated should the SSHCP be delayed indefinitely?
- Relationship of future land uses to agricultural uses to the south. Will there be transitional land uses to protect agriculture?
- Mitigation for the loss of agricultural lands
- Impacts on the GHG emission inventories for the City and County

Thank you for the opportunity to comment on this Notice of Preparation. We look forward to the Draft Environmental Impact Report.

Sincerely,

Antonia Barry
Principal Environmental Analyst

DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE

2379 GATEWAY OAKS DRIVE, SUITE 150

SACRAMENTO, CA 95833

PHONE (916) 274-0635

FAX (916) 272-0602

TTY 711

*Flex your power!
Be energy efficient!*

October 27, 2010

032010-SAC0052

03-SAC-VAR

Proposed City of Elk Grove Sphere of Influence Amendment

Notice of Preparation

SCH #2010092076

Mr. Don Lockhart

Sacramento Local Agency Formation Commission (LAFCo)

1112 I Street #100

Sacramento, CA 95814-2836

Dear Mr. Lockhart,

Thank you for the opportunity to review the Notice of Preparation (NOP) for the Proposed City of Elk Grove Sphere of Influence (SOI) Amendment. The SOI includes 7,869 acres south of Bilby Road, Kammerer Road, and Grant Line Road, extending south to Eschinger Road and the Cosumnes River; east towards Cosumnes River and just past Freeman Road; and west towards Interstate 5 (I-5) and the Union Pacific Railroad tracks. Our comments are as follows:

- A Traffic Impact Study (TIS) should be completed and include an analysis of impacts to the State Highway System (SHS). The TIS should include the main line segments on SR 99 from Elk Grove Boulevard to Dillard Road and on I-5 from Elk Grove Boulevard to Twin Cities Road and all interchanges within those segments. The TIS should consider all possible traffic impacts to all ramps, ramp intersections, and mainline segments. The "Guide for Preparation of Traffic Impact Studies" can be found on our website at: <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/>. The TIS should use a Select Zone Analysis to identify trip distribution of the proposed project on the SHS. A queuing analysis and merge/diverge analysis should be completed, especially where the highway facility is already at Level of Service F. We would appreciate the opportunity to review and comment on the scope of the TIS before the Study begins.
- If the Traffic Impact Study identifies any significant traffic impacts, please coordinate with Caltrans to investigate feasible mitigation measures. Potential mitigation measures could include ramp widening and ramp metering, ramp intersection improvements, signalization modification, auxiliary lanes, mainline improvements, off-highway projects as well as fair share funding.

Mr. Don Lockhart
October 27, 2010
Page 2

- Caltrans looks forward to continuing work with the City of Elk Grove to improve mobility through the I-5 and SR 99 corridors. We request a meeting with the City prior to the draft environmental document's release to discuss the scope, timing, and funding of transportation improvements, with an emphasis on creating a multi-modal transportation system that provides mode choice to Elk Grove residents, employees and visitors.
- Future transit service to the area should be identified and options for funding capital and operations should be identified in the financing plan.

A Drainage Report needs to be prepared and submitted to the District 3 Caltrans Hydraulics Branch for review. Please provide a report with the following information to Mr. Gurdeep Bhattal for review prior to final project approval. Mr. Bhattal can be contacted at (530) 740-4830.

- Alteration of drainage patterns, erosion, storm-water discharges, and flooding.
- The comprehensive 100-year event plan detailing how storm-water will be handled, and increases in water run-off and water quality.
- An Encroachment Permit will be required for any work conducted in the State's right of way such as sign placement, traffic control, light installation, culvert maintenance, drainage pattern changes, or sidewalk installation. For more information on Encroachment Permit requirements or to secure an application contact the Encroachment Permits Central Office at (530) 741-4403.
- Any proposed advertising signs or billboards that would be directed towards travelers on I-5 or SR 99, and located within 500 feet of State right of way, would need to be reviewed by our Outdoor Advertising Branch in the Office of Traffic Operations. Please contact James Arbis at (916) 654-6413.

If you have any questions regarding these comments, please contact Sadie Smith at (530) 741-4004 or sadie_smith@dot.ca.gov.

Sincerely,



ALYSSA BEGLEY, Chief
Office of Transportation Planning – South

cc: State Clearinghouse



SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT

The Power To Do More.®

P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

Date: November 2, 2010

To: Sacramento Local Agency Formation Commission
1112 I Street #100
Sacramento, Ca 95814

Subject: Response to Notice of Preparation of a Draft Environmental Impact Report for the Elk Grove Sphere of Influence Amendment Project

(LAFCo File No. 09-10)

To: Don Lockhart, AICP, Assistant Executive Officer

If the land use designations in the Sphere of Influence were to stay consistent with what presently exist there would be little to no effect to SMUD.

It is reasonable to assume that the large area between Kammerer and Eschinger Roads and the Hood-Franklin Road interchange at I-5 will ultimately be developed similar to the East Franklin /Laguna Ridge area. Therefore, it is estimated that no less than four neighborhood substations would be required. The typically substation has 2- 69kV to 12kV transformers and 6 to 8 feeders per substation. The source for the neighborhood substations is the 69KV sub-transmission system, thus overhead 69kV lines are required.

We have purchased a site for a future Franklin Bulk substation. The site is located along Franklin Boulevard north of Kammerer Road's future extension. Franklin Bulk substation will be the source for the 69kV circuits required to serve existing growth and will have the ability to serve the SOI.

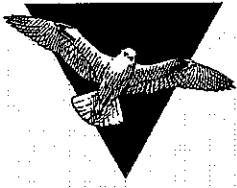
The SOI east of HWY 99 has existing 69KV along Grant Line and East Stockton that emanate from Elk Grove Bulk substation. There is potential growth in this area to warrant multiple neighborhood substations.

In summary the Sphere of Influence will require major infrastructure expansion if the land use designations were to change to match the typical land uses within Elk Grove's City limits.

Thank you,

Jerry Clark
Land Agent-Real Estate Services
SMUD
6201 S Street, B304
Sacramento, CA 95817
(916) 732-5246
Jclark2@smud.org

CC: Gilbert Angeja
Ray Ferraro
Harry Mark III



Sacramento Audubon Society

P. O. Box 160694, Sacramento, CA 95816-0694

July 26, 2006

Mayor Rick Soares and City Councilmembers
City of Elk Grove
8380 Laguna Palms Way
Elk Grove, CA 95758

Re: Comments on the Initiation of a Study Process for Southward and Southeastward
Expansion by the City of Elk Grove

Dear Mayor Soares and Council Members:

This letter comes on behalf of Sacramento Audubon Society. On January 18, 2006, Sacramento Audubon, in coalition with the Sierra Foothills Audubon Society, the San Joaquin Audubon Society, and Audubon California submitted a letter to the City of Galt categorically opposing any intrusion of urbanization into the landscape south of the City of Elk Grove and north and west of the City's of Galt's current northern boundary, whether by Galt, Elk Grove, or Sacramento County. The City of Elk Grove's proposal to now initiate a study to sprawl southward into this same landscape raises the same concerns. Southward sprawl by Elk Grove would be a serious mistake because of the global significance of this area's wildlife habitats. Sacramento Audubon urges the City to instead adhere to a growth strategy that is consistent with the Sacramento Area Council of Governments' ("SACOG") Blueprint principles.

Audubon's involvement in this landscape runs deep. The regional Audubon chapters and Audubon California have a long-standing history and demonstrated commitment to conserving and protecting the Cosumnes River corridor's critically important resident and migratory bird habitats. The following points, which were previously raised in our January 18, 2006 letter to the City of Galt, summarize Audubon's activist tradition, and the reasons for our willingness to fight to protect and conserve these lands for their vital wildlife and habitat values.

Audubon members and volunteers were among the first to document the avian resources of this area, with field trips beginning as early as the 1940's, along with volunteer activities in collaboration with private landowners, to monitor and enhance bird habitat. In the early 1970s, Audubon highlighted the natural resources of this area in a report entitled "Areas of Critical Environmental Concern." In the late 1980s, with the first purchases of property in the lower Cosumnes floodplain by The Nature Conservancy, Ducks Unlimited, and the US Bureau of Land Management, Audubon organized systematic bird surveys on the Cosumnes River Preserve, surveys which continue to this day and help provide an important science-based framework for

land management and restoration in this area. Most recently, based in large part on this knowledge base, Audubon California has designated the lower Cosumnes basin an "Important Bird Area" in recognition of its global importance for a wide range of bird species.

The grasslands and open agricultural fields of the area provide a primary winter roosting and foraging area for a significant percentage of California's sandhill cranes, which annually migrate from as far north as Alaska and Siberia, and whose seasonal return to the area sparks local festivals and visits by Audubon members from around the world to enjoy their singular grace and beauty. These same grasslands also provide essential foraging ground for the federally "threatened" Swainson's hawk, and many other resident and migratory raptor species.

The lower Cosumnes basin hosts one of the largest remaining valley oak riparian woodland complexes in California. These stands of oaks provide critical nesting habitat for migratory songbirds that winter in the tropics and return to California each spring to breed and raise their young. They also constitute nesting habitat for one of two remaining population clusters of Swainson's hawk in California.

The wetlands and stream courses west of the Cosumnes River host the largest remaining population of California's Giant Garter Snake, a species that is also presently listed as "threatened" under the Federal Endangered Species Act.

Due to urban expansion and sprawl, many of the species that depend on the lower Cosumnes River's unique mix of habitats have diminished in number to the point where they are classified by the state or federal government as threatened or endangered. Many other species that are not presently listed depend on the lower Cosumnes basin to maintain their current population numbers. If the remaining vestiges of these critically important habitats are further compromised by further urban encroachment and sprawl, many of these species would also likely diminish in number to the point that they, too, would need to be considered threatened or endangered.

The significance of California's Great Central Valley as habitat for a broad range of bird species is well documented by Audubon's Christmas Bird Count (CBC) database. Each year Christmas Bird Counts are conducted in nearly 2000 Count Circles (15 mile diameter) throughout North America. Rankings of these circles over the past several years, based on the total number of grassland-associated raptors found, reveal that the Central Valley of California is one of, if not *the*, most important wintering area in the entire continent for these species. In fact, four of the top five Count Circles are in the Central Valley (Lincoln, Benecia, Cosumnes, and Sacramento).

The bases for Audubon's ranking of the lower Cosumnes basin as an "Important Bird Area" are documented in Audubon California's book, Important Bird Areas of California, and include, in addition to the matters stated above, the global importance of the Cosumnes basin for migratory shorebirds (including the long-billed curlew), the Sandhill crane, 13 sensitive wetlands-, grasslands-, and forest-dependent species, and the thousands of waterfowl that winter in the area.

Audubon volunteers have participated in local government policy development for management of Sacramento County's important natural areas for several decades. Audubon, for example, helped develop and actively supported the strong conservation policies in Sacramento County's general plan – policies that explicitly call out the important resource and habitat values of the lower Cosumnes area.

More recently, Audubon volunteers have been actively involved in the development of a proposed habitat conservation plan for southern Sacramento County. This involvement has strengthened our belief that protection of the remaining habitats in the lower Cosumnes and associated agricultural areas is a *vital* component for the success of any habitat mitigation and conservation strategy for the greater Sacramento region.

The regional Audubon chapters also support the principles espoused in SACOG's "Blueprint," a set of land use principles expressly designed to avoid the need for new development on sensitive habitats and important farmlands, to minimize traffic-generation and air pollution from new development, and to meet our increasingly-urgent obligation to grow in ways that are energy-efficient and climate-friendly.

As part of these activities and their long-running involvement in conserving and preserving this critical landscape, Sacramento Audubon has been working with the regional chapters and Audubon California to track the future planning activities of local governments in the area. While we were initially encouraged by Elk Grove's leadership in habitat mitigation and expressed desire to protect and enhance existing populations of Swainson's hawk and other migratory species, we have been increasingly concerned about the lack of transparency in that habitat mitigation program and the City's failure to collaborate effectively with existing conservation organizations. We are now deeply concerned that the City has even suggested that it might authorize the consideration of a growth scenario that would allow southward sprawl onto the highly sensitive landscape described above and further encroachment into the Deer Creek-Cosumnes River corridor upstream of Highway 99. Our concerns are heightened by language in the City's staff report that appears to frame the habitat and agricultural land protection issue for this landscape in a misleading manner, specifically by suggesting that just the areas at the southern edge of the "planning area" have significant habitat values. In fact, as the City of Elk Grove is well aware, the *entire* planning area is critically important habitat for the Swainson's hawk and a broad range of other species. You may also recall that the Environmental Impact Report for your General Plan was viewed by the state and federal resource agencies as presenting an embarrassingly inadequate assessment of habitat values in this area.

We understand that the City of Elk Grove must comply with CEQA prior to making any final decision about future growth, and that we will have the opportunity to review and comment on the City's environmental documents. However, we take this opportunity to provide our preliminary comments in order leave no misimpression regarding our resolve to do whatever is necessary to protect these critically important habitats, and to ensure that the City is fully aware of the depth and basis of our concern.

Mayor Soares & Elk Grove City Councilmembers

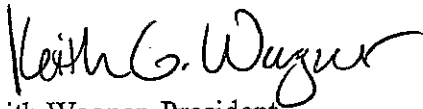
July 26, 2006

Page 4 of 4

Southward sprawl by Elk Grove would be a serious mistake. We urge you to categorically reject from consideration any proposal that would encroach on the critically important habitats to the south and southeast of the City's current boundaries. Instead, the City should focus on developing a future growth plan that is consistent with the Blueprint's principles by continuing to develop effective and coordinated mitigation programs, and by designing a plan that will allow the City to benefit as much as possible from the *existing* open space resources at its *existing* southern edge and, in turn, be a good neighbor to the conservation and agricultural lands to the south.

We look forward to working with you in this process.

Sincerely,

A handwritten signature in black ink that reads "Keith G. Wagner". The signature is written in a cursive style with a large, prominent "K" and "W".

Keith Wagner, President
Sacramento Audubon Society

-----Original Message-----

From: Marilyn Armbruster <mailto:maa57@surewest.net>

Sent: Sunday, October 24, 2010 8:06 PM

To: Lockhart, Don

Subject: Elk Grove proposal for expansion

Good evening Mr. Lockhart:

It has been brought to my attention that lands used by the Swainson's Hawks for breeding and nesting are at risk with the proposed expansion of Elk Grove. Please consider these native species have no voice other than those of us who are interested in the habitats for birds and other species. I live in Sacramento and appreciate the awareness for open spaces to preserve animals, birds and plants of our area. Please take this into serious consideration at the hearing this Tuesday. I am unable to attend but do not hesitate to contact me if needed. Thank you. Marilyn Armbruster, M.S., OTR/L, CHT

COUNTY OF SACRAMENTO EMAIL DISCLAIMER:

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by other than the County of Sacramento or the intended recipient is strictly prohibited.

If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.

October 26, 2010

Donald J. Lockhart, AICP
Assistant Executive Officer
Sacramento LAFCo
1112 I Street, Suite 100
Sacramento, CA 95814

Re: Notice of Preparation for a Draft Environmental Impact Report for the Elk Grove (City) Sphere of Influence Amendment (SOIA), LAFCo #09-10

Dear Mr. Lockhart:

Thank you for the opportunity to provide recommendations regarding the scope of LAFCO's draft environmental impact report (DEIR) that will be prepared for the City of Elk Grove's proposed Sphere of Influence Amendment ("SOIA"). The Nature Conservancy recommends that the DEIR address the following issue areas:

1. Aesthetics

Development within the proposed SOIA will have a substantial adverse effect on the rural character of the existing environment, substantially degrading the existing farmland and open space visual character and quality. Urbanized development will also create a new source of glare during the day and substantial light at night which will adversely affect day and nighttime views in the area.

2. Agricultural Resources

The conversion of farmland to non-agricultural uses is a significant adverse impact of the proposed SOIA. Approximately 90% of the land in the proposed SOIA is prime farmland, unique farmland, or farmland of statewide or local importance. Aside from the impacts within the proposed SOIA, it should also be recognized that without some instrument that maintains the viability of existing land uses at the outside edge of the new proposed boundary, the establishment of a new Sphere of Influence (SOI) boundary inevitably leads to speculation and development pressure on those lands immediately adjacent to the new SOI boundary.

Our staff has witnessed the impact of these economic pressures that drive the conversion of agricultural land first-hand. Lands south of the current city limits at Kammerer Road have a much higher land value expectation than lands farther from the urban boundary.

3. Air Quality

The effect of more suburban sprawl in the SOIA will increase vehicle miles travelled per household, which will cumulatively add more air contaminants to the region's already poor existing air quality conditions. Increased vehicle miles travelled per household will also increase greenhouse gas ("GHG") generation frustrating the region's ability to meet recently established GHG targets established by the California Air Resources Board. (See Climate Change/Global Warming and Land Use & Planning Issue Areas, below.)

4. Biological Resources

The proposed SOIA includes a variety of habitat types that support several sensitive plant and animal species. These include winter roosting and foraging areas for the greater Sandhill crane and foraging ground and nesting trees for the Swainson's hawk, both of which are threatened species under the California Endangered Species Act. The proposed SOIA area also hosts other resident and migratory raptor, shorebird, and grassland bird species. The lower Cosumnes River basin hosts one of the largest remaining valley oak riparian woodland complexes in California, which provides critical nesting habitat for migratory songbirds. The wetlands and stream courses feeding into the Cosumnes River host the largest remaining population of California's giant garter snake, a threatened species under the Federal Endangered Species Act.

Many other species that are not presently listed depend on the lower Cosumnes River basin to maintain their current population numbers. If the remaining vestiges of these critically important habitats are further compromised by urban encroachment and sprawl, many of these species would likely diminish in number to the point that they, too, would need to be considered threatened with extinction. We encourage you to consider the regional significance of this area, in light of the considerable investment of public dollars represented by the Cosumnes River Preserve, Stone Lakes National Wildlife Refuge, and Sacramento County's Bufferlands Project—multi-agency projects that protect and encourage wildlife to use this area. South Sacramento County is one of the last areas of the County where wildlife thrives, and the increasing importance of this area as a wildlife resource, as other areas within this region (Natomas and western Placer and El Dorado Counties) are developed, cannot be over emphasized.

The DEIR must do the required surveys at the appropriate time, consistent with the required protocols for gathering information about the mosaic of existing species and habitats that inhabit the proposed SOIA and adjacent areas. The lead agency must also consult with the state and federal trustee agencies including, the California Department of Fish and Game, California State Lands Commission, U.S. Fish and Wildlife Service, and National Marine Fisheries Service (for anadromous fish species).

5. Climate Change/Global Warming

One of the most significant irreversible impacts of this SOIA is its contribution to global warming. LAFCo should review recently revised CEQA Guidelines regarding climate change and greenhouse gas generation. The DEIR should do an inventory of the current generation of greenhouse gases in order to establish baseline conditions and then estimate, as accurately as possible, the quantity of CO₂ that would be added to the environment if the City grows into the proposed SOIA.

Two especially large sources of greenhouse gas emissions are the state's transportation system, insofar as vehicles using it consume greenhouse gas-generating fuels, and the electrical grid, insofar as greenhouse gas generating energy sources are used to create electricity. Land use decisions also give rise to increased emissions to the extent that such decisions affect the extent of power generation and vehicle miles traveled. Consistent with the California Global Warming Solutions Act of 2006 (Health & Safety Code § 38500 et seq.), the lead agency must consider the following, where applicable, in evaluating greenhouse gas emissions associated with the SOIA, potentially significant effects associated with such emissions, and mitigation measures to minimize any such potentially significant effects:

- 1) The extent to which the project could help or hinder attainment of the state's goals of reducing greenhouse gas emissions to 1990 levels by the year 2020, and achieving further reductions thereafter;
- 2) The extent to which the project could increase the demand for fuels or other energy resources, especially fossil fuels that contribute to global warming when consumed; and,
- 3) The extent to which the project would facilitate, or be consistent with, any applicable state, regional, or local plans intended to reduce greenhouse gas emissions.

6. Hydrology & Water Quality

The EIR cannot ignore or assume a solution to the problem of supplying water to a proposed development project. The water needs of this area at full build-out, as well as the source of that water, and the environmental impacts of the use of that water, must be evaluated. The Global Warming Solutions Act identifies specific categories of environmental effects that are consequences of global warming, including a reduction in the quality and supply of water to the state from the Sierra snowpack. The lead agency's EIR needs to address global warming's effect on long term water supplies.

The area targeted by the City for expansion of its current Sphere of Influence (SOI) poses a number of important sensitivities from the standpoints of water supply, floodwater management, and urban discharge. The SOIA is outside of the American River Place of Use and thus poses particular, and complex, challenges for water service; this area is not currently

eligible for water service from Sacramento's Zone 40 program or the Freeport Diversion. It is a critically important area for groundwater recharge in an area where groundwater levels are severely lowered by groundwater pumping as compared with historic levels. In addition, no other area within the County offers similar potential for the agricultural reuse of treated effluent from the Regional Sanitation plant in a manner that bolsters Sacramento County's conjunctive groundwater management program.

While TNC is pleased that the city has removed areas within the 100-year flood plain east of Highway 99 from the proposed SOIA, the DEIR must evaluate the impact that expansion into the 100-year floodplain west of Highway 99 will have on flooding, agriculture, groundwater recharge and habitat.

7. Land Use & Planning

The proposed SOIA conflicts with both the Sacramento Area Council of Governments' (SACOG) 2035 Metropolitan Transportation Plan and the City's General Plan. Both of these plans show capacity for employment and housing growth within the current city limits through 2035. Additionally, SACOG's 2050 Blueprint growth pattern projects capacity for another 19,000 employees and 1,500 housing units from 2035 to 2050. These projections, pointing to a sufficient land inventory for the next 42 years, bring into question the need for bringing additional land into the City's SOI at this time.

We urge LAFCO to consult with SACOG staff about SACOG's update of the regional transportation plan and compliance with Senate Bill 375 – Sustainable Communities Strategies Act. The issue is whether the City of Elk Grove's proposed SOIA is consistent with the regional GHG reduction targets that SACOG must meet when preparing a sustainable community strategy for the region.

8. Utilities & Service Delivery Systems

At full build-out, what will the energy needs of this area be? How will that energy be produced? What effect will this project have on peak and base period demands? These questions should all be addressed in order to determine the need for new services as well as to evaluate their contribution to global warming. This proposed project poses significant, irreversible adverse impacts to the environment resulting from the eventual loss of farmlands, floodplains, habitat, and open space. The commitment of these nonrenewable resources to uses that future generations will be unable to reverse should be carefully weighed and considered.

Thank you again for the opportunity to comment on the scope of an EIR for the SOIA.

Donald J. Lockhart, AICP
Sacramento LAFCo
October 26, 2010
Page 5 of 5

Sincerely,



Michael Conner, Project Director
Cosumnes River Preserve

CC: Beatrix Treiterer, Stones Lakes National Wildlife Refuge
Charlotte Mitchell, Sacramento County Farm Bureau
Todd Gardner, California Department of Fish and Game
Dan Taylor, Audubon
Harry McQuillen, U.S. Bureau of Land Management
Jill Ritzman, County of Sacramento Department of Regional Parks
Jim Pacht, Friends of the Swainson's Hawk
Jude Lamare, Friends of the Swainson's Hawk
Mark Biddlecomb, Ducks Unlimited
Matt Reeve, California Department of Water Resources
Mike McKeever, Sacramento Area Council of Governments
Steven Szalay, County of Sacramento
Don Nottoli, Supervisor, 5th District
Eric Milstein, State Lands Commission
Taro Echiburu, City of Elk Grove

To: Sacramento Local Agency Formation Commission(LAFCo)

Attention: Mr. Don Lockhart AICP Assistant Executive Officer

Subject: Comments regarding the Notice of Preparation of a DEIR for the Elk Grove Sphere of Influence Amendment Project (LAFCo File No 09-10)

In response to Elk Grove's application I want it to be known that as a resident of Elk Grove I am against the proposed SOI and expansion. However as the Draft Environmental Impact Report moves forward I want and request the following be addressed within this report.

Hazards and Hazardous Materials:

- Rail lines that extend through the SOI and potential for hazardous waste spills and or risk of explosion.
- The proximity of the propane tanks and identifying a safe distance for development based on fire safety industry standards.
- The potential risk of the propane tanks in relationship to homeland security and terrorist threats.

Noise

- Identify and address existing noise and future sources including rail lines, freeway, and widened roadways including the JPA connector.
- There are two general aviation airports located within the city and SOI that have the potential for expansion so the DEIR should address realistic expansion potential and its corresponding impacts on noise and safety.

Land Use and Planning

- The study needs to include a specific analysis related to the revised SACOG (Sacramento Area Council of Government) Blue Print Growth Projection for the region as well as the City of Elk Grove.

Population, Employment, and Housing

- The City of Elk Grove has done a Market Study and the results of this report need to be included in the DEIR.

Transportation

- The environmental impact of new transportation networks (bus routes, light rail infrastructure, bike lanes, roadways for cars) that will be required as a result of urbanization of the SOI.

Sincerely,


Lynn Wheat

9136 Quail Terrace Ct Elk Grove 95624

From: Dempseys [<mailto:dempseys123@gmail.com>]
Sent: Tuesday, October 26, 2010 4:44 PM
To: Lockhart, Don
Subject: Elk Grove Expansion

Dear Mr. Lockhart,

I've looked over the proposed Elk Grove Expansion, and it appears to be the prelude to developing even more outlying land. Believe it or not, I actually want to encourage the right kind of development. This proposal is less-than-optimum in several ways.

1. Sacramento has 20 years worth of development land already within the boundaries of existing communities. There's no need for more development (certainly not now, given the market), unless our communities are in the business of encouraging land speculation. The land speculators would really be the only ones to profit from this proposal.
2. Removing farmland from production is not desirable, given the enormous amount we've already removed.
3. Development even farther out on the edge of the community means we will be literally casting our petroleum dependence in concrete for all those new, and even more distant, commuters.

U.S. domestic oil production peaked in 1971 (at less than \$2/bbl, with only 30% imports), and no matter how much drilling onshore or offshore, we will never return to that peak--or so says the American Petroleum Institute (the oil lobby). We currently import nearly 70% of the oil we burn at roughly \$80/bbl, are waging two wars overseas for oil, and have over 500 military bases to protect pipelines and trade routes for this critical commodity.

Aren't we supposed to be getting off of the oil? Approving this application to develop even more long commutes seems counter-productive, unless we really need some more resource wars.

What do you think?

--Regards,
--Mark Dempsey

COUNTY OF SACRAMENTO
EMAIL DISCLAIMER: This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by other than the County of Sacramento or the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto. _____

James P. Pachl
Attorney at Law
717 K Street, Suite 529
Sacramento, California, 95814
Tel: (916) 446-3978
Fax: (916) 244-0507

jpachl@sbcglobal.net

October 27, 2010

Sacramento LAFCo
ATTN: Don Lockhart, AICP
Assistant Executive Officer
1112 "I" Street, Suite 100
Sacramento, CA 95814

RE: Comments of Friends of the Swainson's Hawk on the Notice of Preparation for DEIR for proposed Elk Grove SOI amendment

Dear Mr. Lockhart,

I represent Friends of the Swainson's Hawk, a nonprofit California corporation. The following are the comments of my client regarding the NOP for the DEIR for the proposed Elk Grove SOI amendment. The EIR will analyze the probable impacts of future urban development that may occur in that area.

The EIR should include disclosure and analyze the following:

Impacts on Swainson's Hawk:

The NOP, p. 5, states that Swainson's Hawks ("SWH") nest in mature riparian habitat along the Cosumnes river. In fact, there are a number of documents SWH nest sites throughout the area between Elk Grove and the Cosumnes River, and within Elk Grove, with one of the highest densities of SWH nests being within and close to the proposed SOI area. Jude Lamare e-mailed maps of SWH nest sites to you yesterday for the use of LAFCo's consultant who is preparing the EIR.

We are particularly concerned about Elk Grove's proposed urban expansion because Elk Grove is located within a dense and significant nesting area for the SWH, listed as threatened under the California Endangered Species Act. Nesting sites both within the City and the proposed SOI area, and southward, depend upon foraging habitat within the nearly 8000 acres proposed for eventual urbanization. The loss of foraging and nesting habitat will be significant. The EIR's analysis should recognize that the density of nesting in the Elk Grove area is among the highest densities recorded for the species.

The EIR analysis should include all the data available from studies conducted by Jim Estep for the City and the South Sacramento County HCP effort, and the California Department of Fish and Game over the last six years. Information in the NDDB is often incomplete and outdated, and thus cannot be relied upon.

The success of SWH reproductive activity and survival of SWH young is directly dependent upon availability of food supply (small rodents) which is reasonably available to nesting SWH during the breeding and nesting season. Destruction of foraging habitat (low-growing vegetation which harbors small rodents) by development eliminates this food supply and forces SWH to travel greater distances to find prey, resulting in less food for the nest and a greater likelihood of nest failure and nestling mortality.

Potential direct and cumulative impacts on the species range and reproductive activity should be identified, including but not limited to the following:

- a) potential impacts on reproductive activity in nesting sites within the City of Elk Grove;
- b) potential impacts on reproductive activity in nesting sites within the SOI area;
- c) potential impacts on reproductive activity of other nesting sites within 2 - 5 miles;
- d) potential impacts on survivability of fledged juveniles from these nesting sites;
- e) potential impacts on the adequacy of nourishment of SWH needed to provide the strength and energy required to survive the annual SWH Fall migration. Undernourished birds, especially undernourished first-year birds, are unlikely to survive the rigors of long-distance migration to central Mexico and southward.
- f) discuss other reasonably foreseeable projects that would eliminate SWH foraging and nesting habitat, as part of the EIR's discussion of cumulative impacts. These would include but are not limited to the proposed Bay Delta Conservation Plan, which proposes to convert large areas of agricultural land in Yolo County and the Yolo Bypass, which is SWH foraging habitat, with managed marshes for fish habitat, eventual build-out of Rancho Cordova and of the Florin-Vineyard area, all of which are SWH foraging habitat, and predicted sea-level rise which will inundate low-lying areas west of Elk Grove which are currently agricultural land that serve as SWH foraging habitat.

Inconsistencies with LAFCo policies IV.C.3.b and c.

The EIR must disclose the project's inconsistencies with applicable plans and policies, and analyze the environmental effects of such inconsistencies.

The part of the SOI between Franklin Boulevard and I-5 would be inconsistent with LAFCo Policy IV.C.3.b. which states that LAFCo will not approve applications with boundaries which result in peninsulas of incorporated territory or otherwise cause distortion of existing boundaries. That portion of the SOI between Franklin Boulevard and I-5 is a peninsula bounded on the north by the USFWS Stone Lake Refuge (land owned by AKT, with perpetual easement to USFWS for management as part of the Refuge); and on the south by agricultural land in a 100-year floodplain.

The SOI peninsula between Franklin Boulevard and I-5 would also be inconsistent with LAFCo Policy IV.C.3.c. which states that LAFCo will not approve applications with boundaries drawn for the exclusive purpose of encompassing revenue-producing territories. The Connector expressway will run the length of the peninsula from I-5 to Franklin Blvd, to Hwy 99, and ultimately to Hwy 50 in El Dorado County, and will attract many more times traffic onto the Connector than presently use the existing Hood-Franklin Road. Elk Grove included the peninsula SOI within the proposed SOI so that Elk Grove may later annex it and line the Connector and/or Hood-Franklin Road with intense revenue-producing retail and commercial development between I-5 and Franklin Blvd. Otherwise, developing the peninsula makes no sense due to infrastructure costs, constrained area, the 100-year floodplain, and incompatibility with the neighboring Refuge and agricultural uses.

Inconsistencies with Government Code §§ 56001, 56300(a).

The Legislature has charged LAFCo's with encouraging orderly growth and development, discouraging urban sprawl, and preserving open space and prime agricultural lands. (Government Code §§ 56001). LAFCo's shall adopt policies which encourage and provide well-ordered and efficient urban development patterns with appropriate consideration for preserving open space and agricultural lands. (Government Code 56300(a)). See LAFCo Policy Manual (pg. 3).

The EIR must disclose inconsistencies between LAFCo's statutory charge and the proposed SOI, and analyze the environmental impacts of such inconsistencies. There are 8000 acres of undeveloped land within the Elk Grove City limit (per Mayor Hume) which could be developed but are not. This includes properties that have been permitted for new development which has not occurred and properties where development started but then stalled or was abandoned. The 2000-acre Laguna Ridge project is one example; another is Lent Ranch Mall. The EIR must disclose the undeveloped areas (including project starts which have stalled) within Elk Grove that could be developed, and the status of development efforts on each such property. The EIR must disclose the environmental impacts of LAFCo approval of an 8000-acre SOI while substantial areas of developable land within Elk Grove remain undeveloped, and the consistency or inconsistency with Government Code §§ 56001, and 56300(a) and LAFCo policies of the proposed approval of the proposed SOI while large tracts within Elk Grove remain undeveloped.

Elk Grove's growth projections should be scrutinized

The City's application asserts that the SOI area will be needed to accommodate future urban growth predicted by unidentified studies. These studies have been discredited by the current reality and were contradicted by SACOG's earlier growth projections. The EIR must evaluate the the studies relied upon by Elk Grove to determine if they are currently credible and show a need for future urban development of the proposed SOI area.

Environmental effects of potential urban decay

CEQA requires an EIR to disclose and analyze the potential environmental effects of potential urban decay that could result from approval of a project, including an SOI. See *Bakersfield citizens for Local Control v City of Bakersfield* (2004) 124 Cal. App. 4th 1184, and discussion below regarding effects of prematurely committing more land to urbanization than can be absorbed by the market, which could lead to urban decay as land within the City remains undeveloped and thousands of foreclosed homes remain unsold due, in part, to competition from new development within the SOI area.

Detrimental effects of prematurely committing more land to urbanization than can be absorbed.

For the reasons stated above, there is a good likelihood that approval of the SOI, in combination with the existence of 8000 acres of undeveloped but developable land within the City and thousands of foreclosed homes needing a market, would result in the premature commitment of more land to urbanization than can be absorbed. The EIR needs to analyze and disclose the environmental impacts of such a scenario.

Sacramento County staff, in response to proposals to greatly expand the County Urban Policy Area in its General Plan Update, addressed that issue in a staff report which recommended against the oversized expansion of the County Urban Policy Area. The County staff listed potential undesirable outcomes as follows:

1. Leapfrog development pressure;
2. Imbalance in focus between revitalizing the existing mature communities creating and serving new neighborhoods;
3. Unintended consequences to the partially built-out planned communities and if newer areas out-compete for buyers;
4. Inefficient extension of infrastructure and public services resulting in higher operating costs.
5. Pressure to approve uses that provide near term economic benefits to the developer over a long-term economically sustainable mix of land uses;
6. Impacts to the proposed SSCHCP and to the Connector expressway;
7. Difficulty in meeting State mandates related to climate change initiatives.

A copy of the County's staff report, with relevant pages 6 - 11, is attached as **EXHIBIT A.**

The EIR needs to consider the likelihood of occurrence of each of these potential scenarios and the potential environmental consequences, including the effects of potential urban decay that may result from prematurely committing more land to urbanization than can be absorbed.

Alternatives

An EIR must discuss alternatives to the proposed project. Certain City Councilpersons and staff have stated that the purpose of the SOI is to provide locations for unspecified employment centers, to remedy Elk Grove's unfavorable jobs-housing balance. An 8000-acre SOI is much larger than any foreseeable need for job centers. Therefore the EIR should consider the alternative of a smaller SOI amendment of 500 - 600 acres, at Highway 99 and Kammerer Road, that would be limited exclusively to development of office and industrial parks.

South Sacramento County HCP ("SSCHCP")

The environmental analysis cannot rely upon the purported benefits of the SSCHCP nor can it rely on the SSCHCP to mitigate for the impacts of development, because the SSCHCP is a changing draft document which will undergo more changes, and may never be adopted or approved by local government and the Federal and State wildlife agencies.

However, the EIR also needs to consider the possibility that the SSCHCP will in fact be adopted, and the effects of the SOI upon the proposed SSCHCP. One effect will be the removal of 8000 acres of farmland that could otherwise be considered for inclusion within the conservation program of the SSCHCP by conservation easement, and the effect of 8000 acres of new development within the SOI area upon the viability of the SSCHCP conservation plan.

At the request of Elk Grove, the draft SSCHCP includes a provision which prohibits the SSCHCP conservation program from acquiring conservation easements ("CE") or land title within the proposed SOI area. The EIR must disclose and analyze the environmental effects of preventing landowners in the SOI area from selling CE's or fee title to the SSCHCP conservation program. One obvious effect is to eliminate the option for landowners to earn sizable sums by selling conservation easements as an alternative to optioning or selling to developers. This prohibition on acquisition by SSCHCP of land or CE's within the SOI area would be a strong growth-inducing impact of the SOI.

Flooding Impacts

The EIR must delineate the 200-year floodplain, disclose which portions of the SOI area are within the 200-year floodplain, and disclose and analyze the impacts of potential for flooding at the FEMA 200-year flood level.

Water Code §9600(e) says: "The Legislature recognizes that the current federal flood standard [100-year standard] is not sufficient in protecting urban and urbanizing areas

within flood prone areas throughout the Central Valley." Water Code §9602(i) and Govt. Code § 65007(k) say: "Urban level of flood protection means the level of protection that is necessary to withstand flooding that has a 1-in- 200 chance of occurring in any given year." (Water Code §9602(h), Govt. Code §§5096.805(j), 65007(i).) Government Code §§ 65865.5(a)(b), 65962(a), (b), and 66474.5(a), (b), prohibit development approvals after certain dates in urban or urbanizing areas which lack 200-year flood protection.

Thank you for the opportunity to comment.

Very Truly Yours,

James P. Pachl

October 27, 2010

Don Lockhart, Assistant Executive Officer
Sacramento Local Agency Formation Commission
1112 "I" Street, Suite 100
Sacramento, CA 95814

RE: Notice of Preparation for DEIR for proposed Elk Grove SOI amendment

Dear Don:

On behalf of the Cosumnes Basin Habitat Defense Project, a collaboration of Audubon California and Defenders of Wildlife, I am providing these comments on the Notice of Preparation. The Project will be preparing formal comments on the Draft EIR when available.

We make these general observations:

1. Preparation of a Draft EIR for this project is premature. The NOP notes the relevance to the DEIR of two documents not yet available, the MOU with Sacramento County and the South Sacramento Habitat Conservation Plan (SSHCP), and logically will need to rely on both, and in particular the latter. Proceeding without those documents, or using draft versions of either document, risks the waste of significant amounts of public dollars. Given the obvious lack of urgency (i.e. the acknowledged enormous amount of unbuilt land and unoccupied commercial and residential properties within the current boundaries of Elk Grove), it is perplexing that LAFCO would deem it appropriate to move forward with an EIR at this time.
2. The NOP's summary characterization of the potential impacts on biological resources is inadequate in several respects, including its implication that the lands within the proposed SOIA have habitat value only because of their proximity to "Preserve and Refuge lands." This gets the relationship backwards – the large investment in conservation in the south county (most of which protects and assures continuing agricultural operations) reflects the global significance of the habitats south of Elk Grove, including the proposed SOIA. I attach a 2006 letter from Sacramento Audubon that provides a brief overview of the biological values of the SOIA. For additional background, the Project's comment letter on the draft SSHCP is at <http://www.cosumnesdefense.com/> (and includes important additional

background information on water supply and hydrology as well).

3. Similarly, the NOP's brief characterization of hydrology fails to mention some key issues. These include the question of the appropriateness of relying upon the current FEMA floodplain delineation, the major issue of water supply (the SOIA is outside the American River place of use), the severe groundwater overdraft condition of the lower Cosumnes River area, and the potential for downstream water quality or flood elevation impacts on Stone Lakes and the Delta.
4. Finally, the NOP proposes an inappropriately narrow consideration of climate issues ("Greenhouse Gas Emission," page 5). In addition to AB 32 and AB 375, the EIR must consider predicted effects of climate change (more severe storm sequences impacting larger floodplain areas, more extended drought periods, substantial sea level rise) on the project. See, for example, <http://e360.yale.edu/content/feature.msp?id=2230> and <http://www.arctic.noaa.gov/reportcard/>.

Assuring that urban forms evolve in a manner that is both sensitive to climate impacts and resilient in light of predicted changes in climate and hydrology is an essential element of LAFCO's statutory obligation under both LAFCO law and CEQA.

Thank you for this opportunity to comment.

Mike Eaton
Cosumnes Basin Habitat Defense Project
PO Box 336
Galt, CA 95632

From: rmburness@comcast.net [mailto:rmburness@comcast.net]

Sent: Wednesday, October 27, 2010 4:09 PM

To: Lockhart, Don

Cc: Sean Wirth

Subject: Habitat 2020 Comments on Elk Grove SOI Amendment NOP for EIR

Don,

I wanted to follow up with at least an email to provide written support for my comments at Sacramento LAFCo's meeting on the Notice of Preparation for the Elk Grove SOI Application EIR.

My comments pertaining to water supply were on behalf of Habitat 2020. Habitat 2020 is a committee of environmental organizations collaborating on common issues in and affecting Sacramento County. The mission of Habitat 2020 is to protect the lands and waters where our wildlife and native plants live in Sacramento County. The member organizations are Sacramento Audubon, Save the American River Association, Sacramento Urban Creeks Council, California Native Plant Society- Sacramento Valley Chapter, Environmental Council of Sacramento, Sierra Club- Mother Lode Chapter, Friends of Swainson's Hawk, Save Our Sandhill Cranes, and Stone Lake National Wildlife Association. Habitat 2020 also serves as an advisory committee to the Environmental Council of Sacramento, with diverse member organizations supporting smart development and the protection of environmental resources in the Sacramento Region.

The Environmental Document for the Sacramento County General Plan update evaluated water demand and supply for proposed growth within the unincorporated South County area and found that the water required to provide for that growth together with adopted city and county plans exceeds the combined available surface water supply and safe groundwater yield established by the Water Forum Agreement by approximately 20,000 AF/year. The area within the proposed SOI was not included in this analysis. Therefore, it is reasonable to assume that development within the EG SOI could add to the shortfall of safe yield groundwater and surface water supplies to meet combined demand for new development in the south Sacramento area.

The EIR on the EG SOI Request needs to carefully evaluate the water impacts of urban development within the SOI. To do this it must consider the potential water demand from a reasonably likely development scenario that would have a high demand for water, such as low-density residential use throughout the proposed SOI. Assumptions regarding water conservation should be in line with targets established by the Water Forum Agreement.

The potential demand for water needs to be compared with the historic pumping of groundwater and any diversion of any Cosumnes River water for irrigation within the SOI. The EIR must look at the range of irrigated acreage over the last 20-30 years, crops grown on that acreage and their associated water demand, and pumping data to arrive at a reasonable estimate of average or typical consumption of water within the SOI for agricultural purposes.

This data should be used to assess the ability of the Sacramento County Water Agency to implement the provisions of the water forum agreement if the EG SOI is approved to allow eventual urban development.

This analysis is important to determine if any mitigation measures are appropriate with respect to additional demand for water. The Sacramento LAFCo established a precedent with its condition pertaining to water supply in the Folsom SOI Approval. The Environmental Document must provide the basis for assisting LAFCo in determining whether similar conditions are warranted.

Thank you for the opportunity to comment

Rob Burness
Habitat 2020

COUNTY OF SACRAMENTO
EMAIL DISCLAIMER: This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by other than the County of Sacramento or the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto. _____



Dedicated to the appreciation of wildlife

October 27, 2010

Sacramento Local Agency Formation Commission

1112 I Street, Suite 100

Sacramento, CA 95814

Attn: Don Lockhart

RE: Notice of Preparation for Proposed City of Elk Grove Sphere of Influence Amendment (LAFCo File No. 09-10)

Dear Mr. Lockhart:

This letter provides the comments of the Stone Lakes National Wildlife Refuge Association (Association) on the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) for the Proposed City of Elk Grove Sphere of Influence Amendment (EG SOI Request). The Association is a nonprofit organization dedicated to preserving and protecting the Stone Lakes National Wildlife Refuge (Stone Lakes NWR). Among other activities, the Association has worked to ensure that Stone Lakes NWR is protected from adverse impacts relating to changes in flows and water quality due to surrounding development in coordination with local, state and federal agencies.

The Refuge is the single largest complex of natural wetlands, lakes and riparian areas remaining in the Sacramento-San Joaquin Delta, and provides critical habitat for waterfowl and other migratory birds of international concern, as well as a number of endangered plant and animal species. Stone Lakes NWR and its surrounding agricultural areas are home to several special status species, including the tri-colored blackbird, greater sandhill crane, white-face ibis, long-billed curlew, Swainson's hawk, burrowing owl, giant garter snake and valley elderberry longhorn beetle.

Please consult the "Draft Comprehensive Conservation Plan and Environmental Assessment for the Stone Lakes National Wildlife Refuge", available at http://library.fws.gov/CCPs/stonelakes_draft.pdf for specific information regarding Stone Lakes NWR resources and as a potential resource in developing the content of the EIR/EIS.

Impacts on Stone Lakes NWR from Land Use Changes Resulting from the SOI Request

The EG SOI Request extends west of Franklin Road to include both sides of Hood Franklin Road as far west as Interstate 5. Despite Sacramento LAFCo policy, the City of Elk Grove has declined to provide any specific information about potential urban development within this area



Dedicated to the appreciation of wildlife

or any portion of the EG SOI Request. Nevertheless, the environmental document must consider the impact of the ultimate annexation and development of the area on the Stone Lakes NWR. Specifically, the planned Capitol SouthEast Connector, a major expressway between Interstate 5 and Highway 50 linking Elk Grove and Rancho Cordova, is proposed to pass through this area. The approval of the EG SOI Request would lead to urbanization of the land around this interchange. It would be the first interchange entering the Sacramento urban area for northbound traffic on Interstate 5, and as such, there is a high probability for intensive development of travel commercial uses, including 4 to 8 story hotels, truck stops and related travel commercial facilities.

The Project Boundary of the Stone Lakes NWR is directly north, west and south of this area. Hood Franklin Road west of I-5 is the gateway to the NWR. The headquarters office and visitor center of the refuge is located approximately ¾-mile west of I-5 on this road.

The environmental document for the SOI Expansion should examine the impact of intensive travel commercial development on the Stone Lakes NWR and its habitat areas. This evaluation should include, but not necessarily be limited to, the potential increased avoidance of the refuge by migratory waterfowl due to adjacent urban development and the potential increase in bird strikes on multi-story buildings.

The environmental document also should examine the potential growth inducing impacts of the EG SOI Request on the ability of the Stone Lakes NWR to realize the full potential for wildlife habitat protection and enhancement within its project boundary. Among the likely impacts are the location of ancillary urban uses, such as truck parking areas, on lands outside the expanded city limits but within the Stone Lakes NWR Project Boundary, the increase in development potential and corresponding increase in land values for adjacent lands within the Stone Lakes NWR boundary, and the reduced opportunity for habitat enhancements for waterfowl resting and feeding areas due to the immediate proximity of urban uses.

In addition to the impacts on the Stone Lakes NWR, the environmental document should examine the impacts of urban development on maintaining the rural character of the historic town of Franklin.

Finally, the environmental document needs to identify and evaluate an alternative project boundary that would exclude the area west of Franklin Road from the EG SOI Request, thereby protecting Stone Lakes NWR from the adverse impacts described above.



Dedicated to the appreciation of wildlife

| Water Quality and Flooding Impacts

The annexation and development of additional land within Watershed C draining into the Stone Lakes NWR could impact flood flow patterns and water quality of water entering the Refuge. The environmental document needs to identify these potential impacts and recommend mitigation measures that could be incorporated as a requirement for project annexation. An example would be a requirement that Elk Grove demonstrate prior to annexation that its proposed development plan will not change the amount, timing and quality of water entering the Refuge from Shed C.

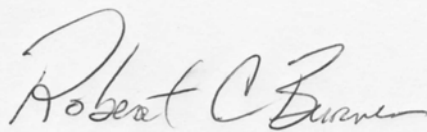
| Growth Inducing Impacts

Under CEQA, the environmental document must look at the growth inducing impacts of the project. The proposed Memorandum of Understanding between Sacramento County and Elk Grove City suggests that growth be mitigated by providing a buffer of agricultural residential land south of Kammerer Road. The environmental document should consider an environmentally superior alternative or mitigation measure that would require that any annexation proposal include provisions for securing the acquisition of development rights for a ½ to 1 mile buffer south of Kammerer Road.

* * *

We urge that the preparers of the environmental document work with Refuge and Association staff to examine these and other potential impacts on the Stone Lakes NWR. Thank you for the opportunity to provide these comments.

Sincerely,



Robert Burness
Chair, Watershed Committee
Stone Lakes NWR Association

-----Original Message-----

From: tinasm@surewest.net [mailto:tinasm@surewest.net]

Sent: Wednesday, October 27, 2010 12:52 AM

To: Lockhart, Don

Subject: Elk Grove SOI

Mr. Lockhart-

I went to the Scoping Session this evening to see what would be discussed. I know that only environmental issues can be considered in the EIR, but I wanted to find out when economic issues are considered.

Economics also shape land use and land use affects natural resources. Natural Resources are the basis for economic development, especially in the context of trading and markets. Since they are all related, I find it disappointing that environmental and economic impacts are considered separately in the LAFCO process. I fear that isolating the components means their impacts are evaluated independently and not cumulatively. The result could defeat the LAFCO purpose, if we end up with a sprawled county that wastes land and despoils resources. So, I have series of questions that should be answered thoughtfully and fairly.

I am a resident of unincorporated Sacramento County. Our services are being cut, slowly and steadily. Is it because we don't have enough retail revenue? Is that what everyone is scrambling for? Is there a fair share of revenue opportunities for each of the incorporated areas and the unincorporated area of Sacramento County now? Will that continue into the future? If the stated (or unstated) reason for Elk Grove's proposed SOI expansion is to capture control of what will presumably be high value land at the intersections of both Route 99 and I-5 with a potential connecting highway to Route 50, then is that land use control a justifiably fair thing for the unincorporated area of the County to suffer losing?

Another fair share question: Is everyone outside of Elk Grove giving up limited water resources for Elk Grove's benefit? Does Elk Grove need the potential revenue from the potential interchanges to pay for extension of utilities and services to the land (and interchanges) it wants to control?

Looking into the future, I fear to see a County paved over and filled with vacant, boarded-up structures sheltering homeless (perhaps a good thing) or housing untaxable illegal economies (not a good thing). I wonder who has the guts to say "Is this what we really mean to create?" Does this orderly, step-by-inevitable-step of expanding incorporated borders result in a complete carving up Sacramento County into warring units of revenue grabbing neighbors?

I am relieved that Elk Grove is stepping back from the 100-year floodplain, letting the County care for this highly functional land and water resource. But we also need to be mindful that paving anything outside the floodplain changes the hydrologic balance so as to increase flood stage, flood frequency, and/or the floodplain extent, not to mention impeding groundwater recharge. Now, imagine that we consider only the 100-year floodplain and in the future allow all the incorporated areas in the County to expand just as far as the 100-year floodplain. The County would be a series of paved islands with wildlife, natural areas, and farms relegated to floodplain corridors winding around them. All are valuable resources, but can they function effectively piled on top of each other? By the way, dare I ask what a fair and judicious way of paying for the County's existing and future levees would be?

I just want LAFCO to be able to step back from the immediate situation and consider where the

County might be heading as a patchworked unit. From an environmental and economic perspective, what resources are we losing and what costs must we (who) now finance? I trust LAFCO and the LAFCO staff will make the time to answer these questions in the process of deliberating who benefits and who suffers if Elk Grove expands its SOI.

It is daunting to put into writing what I would rather hold as a conversation. But perhaps this way more people can be brought into the discussion of where this County is heading. Thank you for the opportunity.

Respectfully,
Tina Suarez-Murias
Antelope

COUNTY OF SACRAMENTO EMAIL DISCLAIMER:

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by other than the County of Sacramento or the intended recipient is strictly prohibited.

If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.

Lockhart. Don

From: Sean Wirth [wirthsoscranes@yahoo.com]
Sent: Thursday, October 28, 2010 7:29 PM
To: Lockhart. Don; rmburness@comcast.net
Cc: Rob Burness
Subject: Re: Habitat 2020 and Sierra Club Comments on Elk Grove SOI Amendment NOP for EIR
 Don,

This is a brief effort to memorialize and capture verbal comments delivered in person at the October 26 NOP scoping hearing at Elk Grove city council chambers.

I am with the Sierra Club, as well as the chair of Habitat 2020 and my comments reflect concerns from both groups.

Since the SSHCP is an ongoing 15 year effort that is far from a done deal, and far from a certainty that it will ever be in effect, it is critical that it not be relied on as the conservation component of your analysis. The Sacramento County General Plan Update EIR had attempted to rely on the SSHCP in this way and in the end had to retract language that expressed anything other than the possibility of such a Plan being available in the future. In the absence of the SSHCP, your analysis will need to address impacts to the biological resources in the expansion area with the realization that a more regional approach to conservation is the only one likely to succeed, hence the need for the SSHCP in the first place.

Given that the SSHCP is not a reality, the impacts to Swainson's Hawks will be unlikely to be fully mitigated, as replacement of like habitat does not address the take of individuals who have been displaced from an area that has the greatest density of nesting and roosting habitat. A regional approach to conservation would have a greater likelihood of potentially assessing and addressing suitable mitigation for such dramatic "take," but the project by project mitigations with the Swainson's Hawk ordinance would be vastly inadequate.

In your analysis of impacts to Greater Sandhill Cranes, please note that in the event of a flood, the floodplain would be unusable habitat and the cranes would need uplands above the floodplain for foraging. This upland habitat would be the area that is proposed for development, with the floodplain being used as likeley mitigation.

Sincerely,

Sean Wirth

--- On Wed, 10/27/10, rmburness@comcast.net <rmburness@comcast.net> wrote:

From: rmburness@comcast.net <rmburness@comcast.net>
 Subject: Habitat 2020 Comments on Elk Grove SOI Amendment NOP for EIR
 To: Don.Lockhart@saclafco.org
 Cc: "Sean Wirth" <wirthsoscranes@yahoo.com>

10/29/2010

appropriate with respect to additional demand for water. The Sacramento LAFCo established a precedent with its condition pertaining to water supply in the Folsom SOI Approval. The Environmental Document must provide the basis for assisting LAFCo in determining whether similar conditions are warranted.

Thank you for the opportunity to comment

Rob Burness
Habitat 2020

COSUMNES



ADMINISTRATIVE SERVICES DEPARTMENT

8820 Elk Grove Blvd.
Elk Grove, CA 95624

(916) 405-7150
Fax (916) 405-5216
www.egcsd.ca.gov

RECEIVED

OCT 14 2010

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

October 13, 2010

Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

Re: Elk Grove Sphere of Influence Amendment – 2010 Revised Application

Commissioners:

Thank you for the opportunity to comment on the City of Elk Grove's revised application to annex a portion of southern Sacramento County into its Sphere of Influence.

The Cosumnes Community Services District (CCSD) currently provides all parks, recreation, fire protection and emergency medical services within Elk Grove's current city limits as well as the proposed Sphere of Influence expansion area (SOI Amendment Area). Our comments will be limited to the impact such an expansion and possible future development would have on parks, recreation and fire services provided by the CCSD.

With respect to the provision of fire protection and emergency medical response services, we concur with the conclusions contained within the revised MSR that the CCSD would remain the most logical provider of these services.

The CCSD also wishes to comment on the proposed provision of parks and recreation services to the SOI Amendment Area, including, especially, the development of new parks and recreation facilities. Generally, the subject of the development of new parks and recreation facilities within the City of Elk Grove is addressed in a Memorandum of Understanding and Settlement Agreement executed in August 2007 between the City of Elk Grove and the CCSD (Settlement Agreement). The Settlement Agreement states generally that all new park and recreation facilities within the geographic limits of the City will be:

- 1) Jointly and cooperatively developed and constructed, including the acquisition of land, collection of fees and location of facilities;
- 2) Jointly owned by and/or dedicated to the City and CCSD; and
- 3) Maintained by the CCSD.

One exception to the above is the city's planned Civic Center and adjacent park, which the city would finance, build and manage independently of the CCSD.

The CCSD is pleased to report that the Settlement Agreement has been implemented and is in effect for several new parks in the Laguna Ridge Specific Plan Area. The CCSD, as well, has signed a maintenance agreement with the City of Elk Grove in which the CCSD is now maintaining all City-owned street median areas within the city limits.

When reviewing the MSR to ensure it provided an accurate description of the CCSD's responsibility for providing current and future parks and recreation services to the SOI Amendment Area, the CCSD found several inaccuracies and ambiguities that should be addressed:

- 1) Page 4.0-48, Section 4.10 Parks and Recreation – the MSR states "The Cosumnes Community Services District (CCSD) is the current authorized parks and recreation service provider in the proposed SOI Amendment area. However, there are no parks and recreation services provided within the SOI Amendment area, as there is little demand for such services."

While it is true that there currently are no parks or recreation facilities within the SOI Amendment Area, the CCSD does provide a myriad of leisure classes, before- and after-school programs, preschool classes, sports programs and community-wide special events that are offered to the residents of the SOI Amendment Area.

- 2) Page 4.0-48 – within the description of the Cosumnes Community Services District, the MSR states "The Cosumnes Community Services District (CCSD) provides park and recreation to the cities of Elk Grove and Galt, as well as unincorporated areas in the region."

This statement is incorrect in that the CCSD does not provide parks and recreation services to the City of Galt.

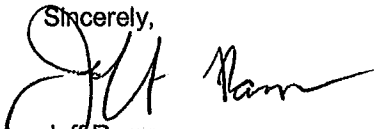
- 3) Page 4.0-55, Determination, Parks and Recreation – the MSR states "The City of Elk Grove and the Cosumnes Community Services District, Parks Department are both adequate parks and recreational service providers. Both the City and CCSD can be the logical parks and recreation service provider for the SOI Amendment area to adequately serve anticipated growth."

This statement is ambiguous as it does not take into account the existing Settlement Agreement which again states generally that all new park and recreation facilities within the geographic limits of the City will be jointly and cooperatively developed and constructed, including the acquisition of land, collection of fees and location of facilities; jointly owned by and/or dedicated to the City and CCSD; and maintained by the CCSD. The MSR should be revised to eliminate this ambiguity and clarify how parks and recreation facilities will be owned and managed if the SOI Amendment Area is annexed into the City of Elk Grove.

Once these concerns are addressed, the CCSD fully expects to adopt a position in support of the proposed amendment and work in cooperation with the City of Elk Grove to ensure that the current and future residents of the SOI Amendment Area receive exemplary parks and recreation services.

Again, thank you for the opportunity to comment on the City of Elk Grove's application to expand its Sphere of Influence.

Sincerely,



Jeff Ramos
General Manager



Regional Transit

**Sacramento Regional
Transit District**
A Public Transit Agency
and Equal Opportunity Employer

Mailing Address:
P.O. Box 2110
Sacramento, CA 95812-2110

Administrative Office:
1400 29th Street
Sacramento, CA 95816
(916) 321-2800
(29th St. Light Rail Station/
Bus 36,38,50E,67,68)

Light Rail Office:
2700 Academy Way
Sacramento, CA 95815
(916) 648-8400

**Human Resources Office:
Employee Relations Office:**
2830 G Street, 2nd Floor
Sacramento, CA 95816
(916) 321-3800
(Bus 30,31,34,67,68)

Public Transit Since 1973

www.sacrt.com

October 13, 2010

Peter Brundage
Executive Officer
Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

**RE: Elk Grove Sphere of Influence Amendment – 2010 (09-10) Revised
Application**

This letter is in response to your request for information regarding the impact of the Elk Grove Sphere of Influence proposal on the Sacramento Regional Transit District (RT).

The proposed sphere of influence location is currently outside of RT's service area and therefore has no present impact upon the territory RT serves. The City of Elk Grove provides its own transit service adjacent to the sphere of influence location. However, RT's 2035 TransitAction Plan identifies either hi-bus service or light rail transit service south to Krammerer Road with a station at Krammerer and Highway 99 in the future.

With that in mind, an effective transit system is dependent upon land use patterns within ½ mile of bus stops and light rail stations. Transit supportive development densities need to be in the medium to high-density ranges and street configurations and lot patterns need to support the transit system. Physical barriers such as walls, cul-de-sacs, circuitous street patterns and speed bumps all impede access to transit. These items should be taken into consideration when the City develops new land uses for the sphere of influence area.

In addition, the provision of high-capacity regional transit service to this area will be dependant upon future funding opportunities to cover capital expenses to build the facility as well as operating costs. Therefore, the City may want to consider including transit fees for this purpose into any infrastructure financing plans being developed for the sphere of influence.


Thank you for the opportunity to comment. Please send any subsequent documents and hearing notices that pertain to this project as they become available. If you have further questions regarding these recommendations, please contact me at (916) 556-0340 or rcovington@sacrt.com.

RECEIVED

OCT 14 2010

SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

Sincerely,



Rosemary Covington

AGM Planning and Transit Service Development