

6 REORGANIZATION

6.1 INTRODUCTION

The Cortese-Knox Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 5600, et. seq.) charges LAFCo with ensuring the timely and orderly formation of local government agencies and boundaries, to preserve prime agricultural and open space resources, and to discourage urban sprawl. Pursuant to the Act, LAFCo is responsible for reviewing logical and timely changes in local government boundaries, including reorganizations such as those considered in the Folsom Corporation Yard SOIA/annexation project. The reorganization chapter of the EIR summarizes setting information and identifies potential impacts related to reorganization of the project specific to the Sacramento Local Agency Formation Commission's (LAFCo) policies and standards related to the environment.

A reorganization is defined as two or more changes of organization. Reorganization of the project site consists of annexation of the project site to the City of Folsom (City) and Sacramento Regional County Sanitation District (Regional San) and detachment from affected special districts. The project and cumulative environmental impacts of the conversion of the project site from agricultural/vacant land to industrial development are addressed in Sections 3.1 through 3.12 of this EIR.

6.2 ENVIRONMENTAL SETTING

The following is the environmental setting that applies to the reorganization request. Please see Chapter 1, *Introduction*, Section 3.2, *Agricultural and Forestry Resources*, for regulations regarding agricultural resources, Section 3.9, *Hydrology and Water Quality*, and Section 3.12, *Utilities and Service Systems*, for discussion of population and housing, affordable housing, disadvantaged communities, environmental justice, recreation, agriculture, and public services.

6.2.1 Overview of Reorganization Request

The project would involve the reorganization of 57.8 acres in unincorporated Sacramento County, south of U.S. Highway 50 and the City of Folsom boundary (see Exhibit 2-2). This reorganization would involve annexation and detachment of the 57.8 acres from the following service districts:

- ▲ annexation to the City of Folsom,
- ▲ annexation to Regional San,
- ▲ detachment from Sacramento Regional Solid Waste Authority,
- ▲ detachment from Sacramento Metropolitan Fire District (fire protection and emergency services),
- ▲ detachment from County Service Area No. 1 (street and highway lighting),
- ▲ detachment from County Service Area No. 10 (enhanced transportation services),
- ▲ detachment from Wilton/Cosumnes Park and Recreation Area (County Service Area 4B),
- ▲ detachment from Zone 13 of the Sacramento County Water Agency Zone 13, and
- ▲ detachment from Sloughhouse Resource Conservation District.

6.2.2 Fire Protection

SACRAMENTO METROPOLITAN FIRE DISTRICT

The project site is currently located within the boundaries of the Sacramento Metropolitan Fire District. Sacramento Metropolitan Fire District (Metro Fire) is an independent, special fire district located in the northern, unincorporated portion of Sacramento County, and a small part of Placer County. Metro Fire is bordered by—but does not include—the Natomas Fire Protection District or the City of Sacramento to the west, the City of Folsom to the northeast, and the City of Elk Grove to the southwest. The Cities of Citrus Heights and Rancho Cordova are both located in the northern portion of the District. The other towns and communities within Metro Fire are unincorporated, and the County has land use jurisdiction over these communities.

Metro Fire provides emergency and fire response services to nearly 600,000 people in a 417-square-mile area from 42 stations and employs 750 uniformed and support personnel. Metro Fire provides fire protection, fire prevention, fire safety education, emergency medical aid, and other emergency response services. The closest fire stations to the Project site are approximately 9 and 8 miles away at Station 63 (12395 Folsom Boulevard, Rancho Cordova, CA 95670) and Station 32 (8890 Roediger Lane, Fair Oaks, CA 95628), respectively.

CITY OF FOLSOM FIRE DEPARTMENT

If the annexation is approved, fire protection services within the project site would become the responsibility of the City of Folsom Fire Department. The department has approximately 65 employees that provide fire protection and emergency medical services to approximately 77,271 residents in an area covering 30 square miles (City of Folsom 2017a). Fire personnel are typically assigned on a three-shift work schedule, which provides the city with coverage 24 hours a day, 7 days a week. The department maintains four fire stations within the City, with a fifth fire station currently being built and estimated to be completed in August of 2018:

- ▲ Station 35—535 Glenn Drive
- ▲ Station 36—9700 Oak Avenue Parkway
- ▲ Station 37—70 Clarksville Road
- ▲ Station 38—1300 Blue Ravine Road
- ▲ Station 39 (currently under construction)—2139 Ritchie Road

The department provides paramedic/advanced life support services from all four stations using cross-trained firefighter/paramedics. The department participates in a countywide resource deployment plan that ensures the closest available emergency crew responds to the scene of emergencies, regardless of geographic boundaries. In 2017, the department responded to 7,618 requests for service, an average of 20.8 per day. The City of Folsom currently has 0.864 firefighters per 1,000 residents (Rodriguez, pers. comm., 2018).

The Insurance Services Office (ISO) rating is the recognized classification for a fire department or district's ability to defend against major fires. A rating of 10 generally indicates no protection, whereas an ISO rating of 1 indicates high firefighting capability. The department's ISO rating is currently a class 2.

First-response service to the project site would be provided by Station 35 at 535 Glenn Drive, approximately 4.3 miles north of the project site via Prairie City Road. A new fire station is planned to be built north of White Rock Road in the FPASP area and within 3.1 miles from the project site. When that station is built, it would serve as the closest emergency response for the SOIA/annexation area. That fire station will be Folsom's sixth fire station.

6.2.3 Street and Highway Lighting

COUNTY SERVICE AREA NO. 1

The project site is currently located within the boundaries of the Sacramento County Service Area 1. County Service Area 1 provides the street and highway safety light maintenance in the area with some road maintenance, as well (LAFCo 2017a). The service area encompasses Unincorporated Sacramento County, plus the city of Rancho Cordova. The County provides maintenance to 23,140 street lights and 3,770 highway safety lights (LAFCo 2017a). No street lights are located on the project site contains.

CITY OF FOLSOM STREET MAINTENANCE DIVISION

If the annexation is approved, the street maintenance would be provided by the City of Folsom Street Maintenance Division. The division provides pavement condition inspection, pavement maintenance, sidewalk uplift/trip hazard repair, alley maintenance, street sweeping, weed abatement, creek and storm drain inspections and maintenance, and streetlight maintenance. The City of Folsom has maintained a Pavement Management Five Year Capital Plan since Fiscal Year 2004 (City of Folsom 2017b).

6.2.4 Transportation Services

COUNTY SERVICE AREA NO. 10

The County Service Area No. 10 currently provides extended transportation and related services to the area which includes the project site; however, there are no services being provided to the project site. The only active zone of benefit consists of the North Vineyard Station Specific Plan area while the unincorporated portion of Mather Field Specific Plan remains an inactive part of the County Service Area No. 10 (LAFCo 2017b).

6.2.5 Drainage and Wastewater Service

SACRAMENTO REGIONAL COUNTY SANITATION DISTRICT

Regional San is authorized for operation, maintenance, and construction of wastewater conveyance, treatment, and recycling facilities of greater than 10 million gallon per day capacity. Regional San is controlled by a governing body consisting of representatives from Yolo County and from the Cities of Sacramento County, Folsom and Sacramento, Citrus Heights, and Elk Grove and Rancho Cordova and West Sacramento (LAFCo 2017c). If the project is approved the project site would be annexed into Regional San's SOI.

SACRAMENTO COUNTY WATER AGENCY, DRAINAGE DIVISION

The Sacramento County Water Agency is authorized to perform drainage, water supply and flood control. Zone 13 of the Sacramento County Water Agency was established in 1987 to perform studies related to water supply, drainage and flood control affecting all or part of the unincorporated areas of Sacramento (including the project site) and the City of Citrus Heights.

CITY OF FOLSOM DEPARTMENT OF PUBLIC WORKS

The City of Folsom Department of Public works provides storm drainage service to the City of Folsom. It is responsible for the design and management of capital improvement projects in the city including drainage facilities. Upon annexation, the project site would be located within the boundaries of the City of Folsom Department of Public Works.

6.2.6 Parks and Recreation

The project site is vacant grazing land and contains no existing park or recreation features. The only built features onsite are high-voltage transmission lines. Sacramento County zones this property as a Special Planning Area. To the west, California State Parks has an off-highway motor vehicle park, Prairie City State Vehicular Recreational Area (SVRA), which contains trails and tracks open to almost daily off-highway motor vehicle use.

COUNTY SERVICE AREA 4B (WILTON-COSUMNES PARKS AND RECREATION AREA)

The project site is currently within the boundary of the Wilton Cosumnes Parks and Recreation Area 4B. This County Service Area is a rural area responsible for the park and recreation services in the area. There are 4 acres of developed land and 23 acres of undeveloped land in the district meant for recreation uses. The project site is not part of the lands meant for recreation uses in the district. The undeveloped land is the Wilton Community Park Site located approximately 20 miles southwest from the project site. There are two school parks and one park under development for which the County is responsible (LAFCo 2017d).

CITY OF FOLSOM PARKS AND RECREATION DEPARTMENT

The City of Folsom Parks and Recreation Department provides and maintains a full range of recreational activities and park facilities for the City. The Department also maintains the City's trail system and oversees the City's Lighting and Landscape Division.

6.2.7 Natural Resources

AGRICULTURAL LANDS

As described in Section 3.2, *Agriculture and Forestry Resources*, LAFCo utilizes a definition of agricultural lands that differ from those utilized under CEQA. Section 56064 of the Cortese-Knox-Hertzberg Local Government Reorganization Act defines "prime agricultural land" as:

"Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- (a) Land that qualifies, if irrigated, for rating as class I or class II in the U.S. Department of Agriculture (USDA) NRCS land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- (b) Land that qualifies for rating 80 through 100 Storie Index Rating.
- (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the USDA in the National Range and Pasture Handbook, Revision 1, December 2003.
- (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.
- (e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.

Approximately 80 percent of the site is would qualify as prime agricultural land under LAFCo's definition (b), above (see Table 3.2-2).

OPEN SPACE

The project site is vacant grazing land. The only built features onsite are high-voltage transmission lines. Sacramento County zones this property as a Special Planning Area (see Chapter 3.2 for detailed discussion).

SLOUGHHOUSE RESOURCE CONSERVATION DISTRICT

Resource Conservation Districts (RCDs) are special districts of the state of California, set up under California law to be locally governed agencies with their own locally appointed or elected, independent boards of directors. California RCDs implement projects on public and private lands and educate landowners and the public about resource conservation. The Sloughhouse RCD includes agricultural land in south Sacramento County, bordered by White Rock Road to the north, El Dorado County to the east, and San Joaquin County to the south. The western boundary is comprised of Grant Line Road, and the eastern boundaries of the cities of Elk Grove and Galt.

RCD activities specifically include: control of runoff water, prevention or control of soil erosion, development and distribution of water, improvement of land capabilities, dissemination of information and the conducting of demonstration projects in soil conservation. RCDs can, with the consent of the public agency or person owning the land, construct terraces, levees, dams, plant trees, shrubs, and other vegetation. The districts also promote wildlife conservation (LAFCo 2017e). The Sloughhouse RCD does not engage in any activities on the project site.

6.3 REGULATORY SETTING

The following are provisions that apply to the reorganization request. Please see Section 3.2, *Agricultural and Forestry Resources*, for regulations regarding agricultural resources, Section 3.9, *Hydrology and Water Quality*, and Section 3.12, *Utilities and Service Systems*, for regulations regarding public service provisions.

6.3.1 Sacramento Local Agency Formation Commission

Reorganization of the project site is subject to LAFCo's *Policy, Standards and Procedures Manual*. The following provisions are applicable to the project.

GENERAL POLICIES

1. CEQA requires that LAFCo assess the environmental consequences of its actions and decisions, and take actions to avoid or minimize a project's adverse environmental impacts, if feasible, or approve a project despite significant effects because it finds overriding considerations exist. To comply with CEQA, the LAFCo will take one or more of the following actions:
 - a. At its discretion, approve a project without changes if environmental impacts are insignificant;
 - b. Require an applicant to modify a project;
 - c. Establish mitigating measures as a condition of its approval of the proposal, (note the Commission may also impose terms and conditions of project approval other than CEQA identified mitigation measures.);

- d. Modify and approve to avoid or lessen environmental impacts, or disapprove the proposal because of unacceptable adverse environmental impacts;
 - e. Approve the project despite its significant effects by making findings of overriding concern.
2. LAFCo will favorably consider those applications that do not shift the cost for services and infrastructure benefits to other service areas.
 3. The LAFCo encourages the use of service providers which are governed by officials elected by the citizens.
 4. Community needs are met most efficiently and effectively by governmental agencies which:
 - ▲ are already in existence;
 - ▲ are capable of coordinating service delivery over a relatively large area;
 - ▲ provide more than one type of service to the territory which they serve.

GENERAL STANDARDS

B. Conformance with applicable general and specific plans

1. LAFCo will approve changes of organization or reorganization only if the proposal is consistent with the General Plan and applicable Specific Plans of the applicable planning jurisdiction.
2. For purposes of the above policy, the applicable planning jurisdiction is as follows:
 - a. For annexations to a city, the applicable jurisdiction is the city to which annexation is proposed;
 - b. For applications for annexation to or detachment from a district all of whose territory lies within an adopted Sphere of Influence of a city, the General Plan of the city;
 - c. For an application for annexation to a special district for lands outside an adopted city Sphere of Influence, the Sacramento County General Plan;
 - d. For an application for annexation or detachment from a district whose territory lies in both the city and the unincorporated area of the county, the General Plan of the city unless the project lies outside of the city's Sphere of Influence; and
 - e. For applications for incorporations, this standard is inapplicable.
3. For purposes of this standard, the proposal shall be deemed consistent if the proposed use is consistent with the applicable General Plan designation and text, the applicable General Plan is legally adequate and internally consistent and the anticipated types of services to be provided are appropriate to the land use designated for the area.
4. The governing body of the applicable planning jurisdiction shall recommend by resolution whether the proposal meets all applicable consistency requirements of state law, including internal consistency. LAFCo shall retain jurisdiction to determine consistency pursuant to its jurisdiction to approve, disapprove or condition changes of organization or reorganization and may require additional information if necessary.

C. Boundaries

1. LAFCo will not accept as complete any application for a proposal unless it includes boundaries that are definite, certain, and fully described.

2. The LAFCo will approve only applications with boundaries that do the following:
 - a. Seek to correct where relevant illogical boundaries within the affected agency's Sphere of Influence;
 - b. Provide for a mixture of revenue producing and non- or limited- revenue producing properties; and
 - c. Follow where relevant natural or man-made features and include logical service areas.
3. The LAFCo will not approve applications with boundaries which:
 - a. Split neighborhoods or divide an existing identifiable community, commercial district, or other areas having a social or economic identity;
 - b. Result in islands, corridors or peninsulas of incorporated or unincorporated territory or otherwise cause or further the distortion of existing boundaries;
 - c. Are drawn for the exclusive purpose of encompassing revenue-producing territories;
 - d. Create areas for which it is difficult to provide services; or
 - e. Split parcels.
4. LAFCo will make exceptions to the requirements of this standard only if the exception:
 - a. Is rendered necessary because of unique circumstances;
 - b. Results in improved quality or lower cost of service available to the affected parties; or
 - c. There exists no feasible and logical alternative.

E. Agricultural Land Conservation

LAFCo will exercise its powers to conserve agricultural land pursuant to the following standards:

1. LAFCo will approve a change of organization or reorganization which will result in the conversion of prime agricultural land in open space use to other uses only if the Commission finds that the proposal will lead to the planned, orderly and efficient development of an area. For purposes of this standard, a proposal leads to the planned, orderly and efficient development of an area only if all of the following criteria are met:
 - a. The land subject to the change of organization or reorganization is contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development.
 - b. The proposed development of the subject lands is consistent with the Spheres of Influence Plan, including the Master Services Element (Municipal Services Review) of the affected agency or agencies.
 - c. Development of all or a substantial portion of the subject land is likely to occur within five years. In the case of very large developments, annexation should be phased whenever feasible. If the Commission finds phasing infeasible for the specific reasons, it may approve annexation if all or a substantial portion of the subject land is likely to develop within a reasonable period of time.
 - d. Insufficient vacant non-prime lands exists within the applicable Spheres of Influence that are planned, accessible, and developable for the same general type of use.

- e. The proposal will have no significant adverse effect on the physical and economic integrity of other agricultural lands. In making this determination, LAFCo will consider the following factors:
 - (1) The agricultural significance of the subject and adjacent areas relative to other agricultural lands in the region.
 - (2) The use of the subject and the adjacent areas.
 - (3) Whether public facilities related to the proposal would be sized or situated so as to facilitate the conversion of adjacent or nearby agricultural land, or will be extended through or adjacent to, any other agricultural lands which lie between the project site and existing facilities.
 - (4) Whether natural or man-made barriers serve to buffer adjacent or nearby agricultural land from the effects of the proposed development.
 - (5) Applicable provisions of the General Plan open space and land use elements, applicable growth management policies, or other statutory provisions designed to protect agriculture.
2. LAFCo will not make the affirmative findings that the proposed development of the subject lands is consistent with the Spheres of Influence in the absence of an approved Sphere of Influence Plan. LAFCo will not make the affirmative findings that insufficient vacant non- prime land exists within the Spheres of Influence Plan unless the applicable jurisdiction has:
 - a. Identified within its Spheres of Influence all "prime agricultural land" as defined herein.
 - b. Enacted measures to preserve prime agricultural land identified within its Sphere of Influence for agricultural use.
 - c. Adopted as part of its General Plan specific measures to facilitate and encourage in-fill development as an alternative to the development of agricultural lands.

SPECIFIC STANDARDS BY TYPE OF ACTION

A. Annexation to Cities

1. LAFCo will utilize Spheres of Influence through application of the following standards:
 - a. The LAFCo will approve an application for annexation only if the proposal conforms to and lies wholly within the approved Spheres of Influence boundary for the affected agency;
 - b. The LAFCo generally will not allow Spheres of Influence to be amended concurrently with annexation proposals;
 - c. The LAFCo will favorably consider proposals that are a part of an orderly, phased annexation program by an agency for territory within its Sphere of Influence;
 - d. An annexation must be consistent with a city's Municipal Service Review (aka Master Services Element) of its Sphere of Influence Plan; and
 - e. The LAFCo encourages the annexation to each city of all islands of unincorporated territory and all substantially surrounded unincorporated areas located within the city's Sphere of Influence.
2. The LAFCo will not approve proposals in which boundaries are not contiguous with the existing boundaries of the city to which the territory will be annexed, unless the area meets all of the following requirements:

- a. Does not exceed 300 acres;
 - b. Is owned by the city;
 - c. Is used for municipal purposes; and
 - d. Is located within the same county as the city.
3. The LAFCo will favorably consider proposals to annex streets where adjacent municipal lands will generate additional traffic and where there are isolated sections of county road that will result from an annexation proposal. Cities shall annex a roadway portion when 50 percent of the property on either or both sides of the street is within the city.
 4. The LAFCo will favorably consider annexations with boundary lines located so that all streets and rights-of-way will be placed within the same city as the properties which either abut thereon or for the benefit of which such streets and rights-of-way are intended.
 5. An annexation may not result in islands of incorporated or unincorporated territory or otherwise cause or further the distortion of existing boundaries unless it is determined that the annexation as proposed is necessary for orderly growth, and cannot be annexed to another city or incorporated as a new city. Annexations of territory must be contiguous to the annexing city. Territory is not contiguous if its only connection is a strip of land more than 300 feet long and less than 200 feet wide.
 6. The LAFCo opposes extension of services by a city without annexation, unless such extension is by contract with another governmental entity or a private utility.

B. Reorganization

The LAFCo will evaluate each component organizational change which makes up a reorganization proposal independently. In so doing, the LAFCo will follow the standards presented below:

1. LAFCo will strive to ensure that each separate territory included in the proposal, as well as affected neighboring residents, tenants, and landowners, receive services of an acceptable quality from the most efficient and effective service provider after the reorganization is complete.
2. The service quality, efficiency and effectiveness available prior to reorganization shall constitute a benchmark for determining significant adverse effects upon an interested party. The LAFCo will approve a proposal for reorganization which results in this type of significant adverse effects only if effective measures are included in the proposal.

6.3.2 Environmental Justice

Government Code Section 65040.12

Government Code Section 65040.12 (e) defines environmental justice as: “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws and policies.”

Cortese-Knox-Hertzberg Local Government Reorganization Act

The Cortese-Knox-Hertzberg Local Government Reorganization Act Section 56668(o) defines environmental justice as the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services. Environmental justice addresses issues concerning whether an activity could expose minority or disadvantaged populations to proportionately greater impacts compared with those borne by other individuals.

Senate Bill 244, Disadvantaged Unincorporated Communities

In 2011, Senate Bill (SB) 244 was enacted, resulting in changes to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Cortese-Knox-Hertzberg Act). LAFcos are now required to deny any application to annex to a city territory that is contiguous to a disadvantaged unincorporated community unless a second application is submitted to annex the disadvantaged community as well and LAFcos are required to evaluate disadvantaged unincorporated communities in a municipal service review. SB 244 defines “disadvantaged unincorporated community” as any area with 12 or more registered voters where the median household income is less than 80 percent of the statewide annual median.

6.3.3 Open Space

STATE

Cortese-Knox-Hertzberg Local Government Reorganization Act

Cortese-Knox-Hertzberg Local Government Reorganization Act Section 56059 defines “open space” as any parcel or area of land or water which is substantially unimproved and devoted to an open-space use, as defined in Government Code Section 65560.

Government Code Section 65560 defines open space in the following manner:

(b)"Open-space land" is any parcel or area of land or water that is essentially unimproved and devoted to an open-space use as defined in this section, and that is designated on a local, regional or state open-space plan as any of the following:

(1) Open space for the preservation of natural resources including, but not limited to, areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays and estuaries; and coastal beaches, lakeshores, banks of rivers and streams, and watershed lands.

(2) Open space used for the managed production of resources, including but not limited to, forest lands, rangeland, agricultural lands and areas of economic importance for the production of food or fiber; areas required for recharge of groundwater basins; bays, estuaries, marshes, rivers and streams which are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.

(3) Open space for outdoor recreation, including but not limited to, areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas which serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.

(4) Open space for public health and safety, including, but not limited to, areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs and areas required for the protection and enhancement of air quality.

(5) Open space in support of the mission of military installations that comprises areas adjacent to military installations, military training routes, and underlying restricted airspace that can provide additional buffer zones to military activities and complement the resource values of the military lands.

(6) Open space for the protection of places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

6.4 IMPACTS AND MITIGATION MEASURES

METHODS AND ASSUMPTIONS

As noted above, the analysis below is focused on impacts related to reorganization of the project specific to the Sacramento LAFCo policies and standards for public services and the environment. The project and cumulative environmental impacts of conversion of the project site from agricultural/vacant land to industrial/corporation yard development are addressed in Sections 3.1 through 3.12 of this EIR.

SIGNIFICANCE CRITERIA

Impacts related to reorganization of the project would be considered significant if the project would result in conflicts with LAFCo policies and standards related to public service provision and the environment for any of the following:

- ▲ affordable housing;
- ▲ fire protection services;
- ▲ parks and recreation;
- ▲ wastewater and drainage service;
- ▲ transportation and lighting services;
- ▲ loss of prime agricultural lands (as defined by Section 56064 of the Cortese-Knox-Hertzberg Local Government Reorganization Act); or
- ▲ loss of open space (as defined in Government Code Section 65560).

In addition, impacts related to the reorganization of the project site would be considered significant if the reorganization would result in adverse effects or impacts that are appreciably more severe in magnitude or are predominately borne by any segment of the population, for example, household population with low income or a minority population in comparison with a population that is not low income or minority (i.e., environmental justice impacts).

ISSUES NOT DISCUSSED FURTHER

A discussion of the potential for the project to affect parks and recreation, affordable housing, and disadvantaged communities, is discussed and dismissed in Chapter 1, *Introduction*. The discussion of the potential for the project to result in a loss of prime agricultural lands is discussed in Section 3.2, *Agricultural and Forestry Resources*. As these would be the same impacts as relates to open space defined per Government Code Section 65560, this topic is not further addressed in this chapter. Impacts on drainage service related to the City's provision of new service is discussed in Section 3.12, *Utilities and Service Systems*.

The Folsom Fire Department currently provides fire protection and emergency services to the existing corporation yard and other City facilities. The annexation of the project site into the City of Folsom would put the area under Folsom Fire Department protection as provided by the City. First-response service to the project site would be primarily provided by Station 35 at 535 Glenn Drive, approximately 4.3 miles north of the project site via Prairie City Road that has adequate capacity to serve the project. A new fire station is planned to be built north of White Rock Road in the FPASP area. When that station is built, it would serve as the closest emergency response for the SOIA/annexation area. Development of the site would be required to comply with the City's Fire Code (Chapter 8.36 of the Folsom Municipal Code). There would not be an impact to the Folsom Fire Department and this issue is not discussed further in this EIR.

The project site is not located near an existing developed community (project site and surrounding areas are undeveloped). Therefore, the SOIA/annexation area and surrounding areas do not contain low-income and/or minority populations or unincorporated disadvantaged communities. Therefore, the project would not affect any disadvantaged unincorporated communities or populations, and this issue is not discussed further in this EIR.

IMPACTS AND MITIGATION MEASURES

Impact 6-1: Impacts to the Sacramento Metropolitan Fire District

Detachment of the project site from Metro Fire would not result in significant service impacts to the district because the project site does not require fire services and the City and the County will negotiate a tax sharing agreement to address potential funding issues. Therefore, the project's impacts to Metro Fire would be **less than significant**.

The proposed annexation of the project site would involve the detachment of 57.8 acres from Metro Fire and annexation to the City that would be served by the Folsom Fire Department. This detachment would result in a minor reduction of Metro Fire service area by approximately 1.8 percent. This would decrease the land area Metro Fire is responsible for servicing and would also lose potential future funding that could be generated by the project site if the site is not for governmental purposes. However, the project site is currently open space and does not require fire services and generates no or minimal tax revenue for fire services. According to a recent tax bill, there is no separate levy for Metro Fire (Sacramento County 2017). It is possible that the countywide tax may include some fees towards Metro Fire; however, if the project is approved, the City is required to negotiate with the County regarding a tax sharing agreement. Any additional concerns related to potential loss of funding would be resolved through this negotiation. As a result, the detachment of the project site from Metro Fire would be a **less-than-significant** impact and would not create new or altered service impacts.

Mitigation Measures

No mitigation is required.

Impact 6-2: Impacts to Sacramento County Water Agency Zone 13

Detachment of the project site from Sacramento County Water Agency Zone 13 would not result in significant drainage service impacts because Zone 13 was established for the funding of water supply and drainage studies and does not include the maintenance of drainage facilities. Therefore, project's impacts to Sacramento County Water Agency Zone 13 would be **less than significant**.

Zone 13 of the Sacramento County Water Agency was established in 1987 to perform studies related to water supply, drainage and flood control affecting all or part of the unincorporated areas of Sacramento and the City of Citrus Heights. As noted above, the project site drainage and flood control would be provided by the City (no drainage facilities currently exist on the site). As identified in Section 3.8, *Hydrology and Water Quality*, implementation of Mitigation Measure 3.9-1 would require that stormwater drainage master planning be prepared for the entire project site as part of future site development. This process would require compliance with City stormwater quality requirements that are tied to its NDPES permit requirements to protect surface water quality. Thus, project's impact to the Zone 13 of the Sacramento County Water Agency would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 6-3: Impacts to Sacramento County Service Area No. 1 and 10

Detachment of the project site from Sacramento County Service Area No.1 (street and highway lighting) and No. 10 (enhanced transportation services) would not result in significant roadway facility service impacts because the project site is undeveloped and does not pose current transportation facility service impacts. Therefore, project's impacts to Sacramento County Service Area No. 1 and 10 would be **less than significant**.

Sacramento County Service Area No. 1 was formed in 1986 to consolidate all street and highway safety lighting services into one countywide district and to provide a financing mechanism for the portion of those services not otherwise financed by property taxes. Sacramento County Service Area No. 10 was established on May 13, 2003 to provide extended transportation services for new development to assist in complying with air quality control measures. The project site is undeveloped and currently generates no demands for these services. Upon annexation, the City of Folsom would maintain the project roadways and associated safety lighting. As described in Section 3.3, *Air Quality*, operation-related activities would not exceed SMAQMD-recommended thresholds of significance for any criteria air pollutant and would not require transportation services to address air quality impacts (see Table 3.3-6). Thus, the project's impact to Sacramento County Service Area No. 1 and 10 would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 6-4: Impacts related to Sloughhouse Resource Conservation District.

Detachment of the project site from Sloughhouse RCD would not result in significant impacts to the district because the detachment would reduce the service area and would not remove the ability of the district to continue service to other areas for which it remains responsible. Therefore, project's impacts to Sloughhouse RCD would be **less than significant**.

Detachment from the Sloughhouse RCD would reduce area for which the district is responsible; therefore, the project would not significantly reduce the efficiency of service delivery to the remaining properties within the District's service boundaries. It should be noted that nothing within the project site is owned or operated by Sloughhouse RCD. According to a recent tax bill, there is no separate levy for Sloughhouse RCD (Sacramento County 2017). It is possible that the countywide tax may include some fees towards the Sloughhouse RCD; however, if the project is approved, the City is required to negotiate with the County regarding a tax sharing agreement. Any additional concerns related to potential loss of funding would be resolved through this negotiation. The impact would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 6-5: Impacts related to Regional San.

Annexation of the project site into Regional San's SOI would increase the service area as well as the infrastructure Regional San must maintain and serve. However, the City would provide connections to the site through the FPASP area and Regional San has the capacity to serve the project site without additional upgrades to facilities. Therefore, project impacts to Regional San would be **less than significant**.

If the project is approved the project site would be annexed into Regional San's SOI. Regional San would provide wastewater conveyance, treatment, and recycling facilities to serve the project site. As described in Section 3.12, *Utilities and Service Systems*, the City would connect to infrastructure already planned for in the FPASP. In addition, Regional San has adequate capacity to serve the project site. The City would be required to pay appropriate fees to offset the additional infrastructure costs. Therefore, the project's impact to Regional San would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 6-6: Impacts related to consistency with Sacramento Local Agency Formation Commission policies and standards

The project would generally be consistent with Sacramento Local Agency Formation Commission standards associated with annexation requests that address environmental issues as set forth in its *Policy, Standards and Procedures Manual*. Therefore, the project's impact would be **less than significant**.

The following is a consistency analysis of the project based on the general standards and specific standards by action type set forth in Sacramento LAFCo's *Policy, Standards and Procedures Manual*.

General Standard B. Conformance with Applicable General and Specific Plans

The project site's current land use designation is Agricultural under the Sacramento County General Plan. Upon annexation to the City, the project site would be designated Public and Quasi-Public Facility (PQP) under the City's General Plan. This new designation would be consistent with the anticipated land uses for the site.

General Standard C. Boundaries

The proposed reorganization of the project site would move the City's boundary across White Rock Road to encompass the 57.8-acre area. The future corporation yard would serve existing and future development to the north and would not extend new residential or commercial growth south of White Rock Road. The area is contiguous with City boundaries and would be directly adjacent to other new development in the City. As described in Chapter 2, *Project Description*, if the project is approved, the remainder of land within the legal parcel would continue to be one parcel. Per Sacramento County, the realignment of Scott Road would not result in splitting the parcel. This ensures that the project is consistent with General Standard C(3)(e). While the project would create a slight distortion, contract to General Standard C(3)(b), General Standard C(4)(c) allows LAFCo to make an exception to this standard if there "exists no feasible and logical alternative." As described in Chapter 5, *Alternatives*, the City was unable to find a feasible alternative to the project site which would meet the project objectives.

General Standard E. Agricultural Land Conservation

The following provides a summary of the consistency of the project with LAFCo's policies related to agricultural land conversion standards.

- ▲ The project would be contiguous with the adjacent development to the north which consists of lands approved for suburban uses.
- ▲ A Plan for Services has been prepared for the project that addresses public service provision and utilities.
- ▲ As noted in Chapter 5, *Alternatives*, there are currently no sites within the city boundaries that could feasibly accommodate a new corporation yard. The project site is the only land area adjacent to the City's boundary which could accommodate such a use and has a willing seller. Thus, it can be concluded that insufficient vacant nonprime land exists within the City's boundaries.

LAFCo requires the determination of whether the project would have a significant adverse effect on the physical and economic integrity of other agricultural lands. Although the project is in proximity to other agricultural lands, there are no active farmland uses. Farmland on the east and south of the project site is grazing land. A corporation yard facility would not disallow use of neighboring properties from continuing grazing uses.

Specific Standard A. Annexation to Cities

A Plan for Services has been prepared for the project that addresses public service provision and utilities. The proposed reorganization of the project site would create a 57.8-acre peninsula within the City south of White Rock Road. The area north of this site in the FPASP area is already planned for development for residential and suburban uses. The annexation of the project site and future corporation yard would be for a municipal purpose only.

Based on the analysis above, the project would be consistent with Sacramento LAFCo policies that address environmental issues and this impact would be **less than significant**,

Mitigation Measures

No mitigation is required.

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