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November 27, 2017

MEMORANDUM

To: All LAFCo Commissioners; Don Lockhart
Re: SOIA Application "Kammerer 99"

Habitat 2020 is a coalition of nine environmental organizations. We ask that you not support the Kammerer/99 SOIA application on your agenda Dec. 6, 2017. This memo summarizes our objections to approval of an amendment to Elk Grove's Sphere of Influence to expand urbanization south of the Urban Services Boundary by 1,158 acres.

1. The granting of an SOIA is a regional commitment to expanded urbanization in that area. Therefore, **Commissioners must consider the impacts of urbanization. It is LAFCO's job to prevent urban sprawl, leapfrog development, and premature loss of agriculture. (See attached LAFCo law.) In 2013 the LAFCo commissioners declined to support an expanded Elk Grove SOIA, and Elk Grove withdrew its Application. All of the reasons for denial then remain valid today.**
2. Kammerer/99 SOIA does not meet a reasonable "needs" or "demand" test. There is ample empty land within Elk Grove and the County USB available for development for many years. The SOIA is speculative and will harm orderly development in the County. (See attached Google maps.)
3. The EIR finds the project will have **14 direct significant and unavoidable impacts** (cannot be mitigated) and **8 cumulative significant and unavoidable impacts** on the environment.
4. This SOIA proposal is contrary to all regional infrastructure planning relied upon to ensure orderly development of the region that is in the public interest. **Letters from SACOG, the County, and Regional Water Agency confirm that the proposal is premature.**
5. Chief among the regional planning tools is **SACOG's Metropolitan Transportation Plan**. It governs regional infrastructure investment including all federal transportation funds. The regional air quality plan is based on the MTP and its land use assumptions. **SACOG has stated emphatically that the proposed SOI is not consistent with the MTP.** Commissioners should ask **"what are the likely regional costs and benefits of approving a new urban boundary 30 years ahead of regional infrastructure?"**
6. Water planning is a core prerequisite for orderly development. The County Water Agency has found that **all available water is allocated for elsewhere** (Zone 40, within the USB). Speculation that a presently unknown other source can be found after SOIA approval is not a valid basis for an SOIA.
7. Regional habitat conservation planning will be harmed by the SOIA, which will fuel land speculation, increase competition for "inventory" of appropriate mitigation lands, raising conservation costs, and **undermining orderly implementation of the South Sacramento Habitat Conservation Plan.** (ECOS, County of Sacramento, Cal. Department of Fish and Wildlife) A very **key problem is availability of enough upland due to sea level rise from climate change**. (See attached map, floodplain area.)