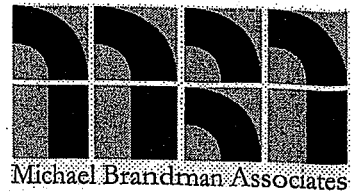


DRAFT



Memo

Date: October 28, 2010
To: Don Lockhart, Assistant Executive Officer
Sacramento LAFCo
From: Randy Chafin and Trevor Macenski

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Elk Grove SOIA EIR – Scoping Meeting, October 26, 2010 – Environmental Concerns Expressed Verbally

Subject:

The following are comments, arranged by topics of concern. Commenter names are not included in this listing of environmental concerns.

Agricultural Resources

Consider the potential impact of widening Grant Line Road on agricultural production.

Hazardous Materials/Hazards

The SOIA includes numerous potential hazards to human health, including railroad tracks, propane tanks, and noise sources.

Land Use / Planning

Portions of the proposed SOIA are contrary to LAFCO policy.

There is ample opportunity for infill development in the city of Elk Grove; additional land for development is not required.

The City should consider re-zoning undeveloped land to less intensive land use designations to compensate for development that will occur in the SOIA.

Some assumed level of urban development needs to be included in the SOIA project for purposes of the environmental impact. Consider using City growth projections as a way of identifying future development. LAFCO's role cannot be fully satisfied without knowing what land use designations are assumed in the SOIA.

Cultural Resources

Consider the potential impact on the historic Franklin community.

Population / Housing

The City's recent market study should be reviewed.

Transportation

All modes of transportation should be analyzed.

Biological Resources

The western extension of the SOIA, where it would abut I-5, presents a potential hazard to the Stone Lakes National Wildlife Refuge, particularly since this area of the SOIA may be designated for highway commercial uses. The increase in land values in this area could negatively impact the ability of the Preserve to acquire additional land.

The proposed HCP won't allow for selling development rights credits for lands within the SOIA.

Don't assume that the HCP will be adopted and available for use in the SOIA.

The SOIA contains a dense concentration of Swainson's hawk, a special-status species. Protection of this species will be difficult without adoption of the HCP.

Consider potential impacts to the Sandhill Crane, a special-status species. When the 100-year flood plain is inundated, this bird temporarily relocates to higher ground. Consider the impact of urbanization on this specie.

The SOIA contains abundant wild animals.

Growth Inducement

The western extension of the SOIA, where it would abut I-5, may induce highway commercial growth beyond the SOIA.

The Memorandum of Understanding includes language that will induce growth.

When considering the potential for growth inducement, consider the length of time required for processing of annexation and development proposals.

Consider the potential growth-inducing impact of the Southeast Connector project in the analysis.

Alternatives

A project alternative should be based on the SACOG Blueprint Plan.

Exclude the lands west of Franklin Boulevard as an alternative.

An alternative is recommended that requires dedication of an open space easement in exchange for development of any land south of Kammerer Road.

The No Project alternative should include a description of how this alternative would affect Elk Grove land use policy for lands within the city limits.

Consider an alternative that only proposes approximately 500 acres of SOIA, specifically designated for employment generating land uses, such as business parks and industrial.

Surface Hydrology / Water Quality

Consider the potential impact on the Stone Lakes watershed of urban runoff flowing into it. Consider including a mitigation measure that would prevent increased runoff into the Stone Lakes watershed.

Simply identifying and avoiding the 100-year flood zone is insufficient; the 200-year flood zone should also be avoided.

Consider the potential impacts of continued agricultural uses on water quality, as compared to urban water quality impacts, which would be subject to more restrict standards.

Urbanization of the SOIA could negatively impact groundwater recharge in the vicinity of the Cosumnes River.

If the potential water quality / hydrology impacts of the SOIA are examined, the higher statewide standards currently in place should be acknowledged, which would automatically mitigate potential impacts.

Public Services / Utilities

The development that would occur in the SOIA would exceed the limitations of the Water Forum allotment. SOIA water demand could negatively impact the ability of other areas to receive water allocations.

The SOIA will further exacerbate the water supply issue. The SOIA should include a mitigation measure to address potential water demand.

It is recommended that the SOIA include a water budget that is a calculation of potential demand relative to existing supplies. Potential development should be based on a worse-case scenario.

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