

**Sacramento Area  
Council of  
Governments**

1415 I Street,  
Suite 300  
Sacramento, CA  
95814

tel: 916.321.9000  
fax: 916.321.9551  
tdd: 916.321.9550  
www.sacog.org



**RECEIVED**

**MAY 23 2011**

**SACRAMENTO LOCAL AGENCY  
FORMATION COMMISSION**

May 18, 2011

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

Dear Mr. Lockhart,

Thank you for inviting SACOG's comments on the Elk Grove Municipal Service Review for the Elk Grove Sphere of Influence Amendment Request. The revisions to "Area Growth and Population" chapter, dated April 27, 2011, include information on SACOG's current housing and employment projections and suggest those projections as the basis for the city needing additional development land outside the current city limits. We do not find these statements to be accurate and would like to correct the following points.

- Page 3.0-2 states, "The City utilized the MTP 2035 growth projection numbers in calculating future needed acreage for the initial Sphere of Influence Amendment application submitted in May 2008 and subsequent application update submitted in August 2010." SACOG submitted comments to LAFCO and the City explaining the misstatement of our projections for this purpose. Please reference the attached letter to the City dated January 23, 2008 and the letter to LAFCO dated August 13, 2008.
- Page 3.0-3 provides a table showing a "SACOG 2035 MTP Projection" for population. We did not provide this information and we have not released population projections for individual jurisdictions at this point in our MTP update process.
- Page 3.0-4 states, "The City has based future land demands on SACOG's MTP 2035 Preliminary Draft Preferred Scenario projections to estimate the amount of vacant lands necessary to accommodate the projected growth" and references "Table 3.0-45 Land Demand Projections for the MTP 2035 Preliminary Draft Preferred Scenario". The same paragraph then continues, "Based on the availability of 2,918 acres within the City, a total of 6,327 acres will be needed outside of the City limits to accommodate the projected growth to 2035". Again, we did not provide the acreage numbers shown in that table nor do we believe that additional acreage outside of the city is needed to meet our draft 2035 projections. For your reference, the projections we are using in our MTP 2035 Preliminary Draft Preferred Scenario are below. These projections were coordinated with city staff to ensure consistency with the city's latest capacity estimates for development *within* the current city limits. The projections do not assume development outside of the current city limits. The research supporting our current projections for the region indicate the region will grow less and at a slower pace than previously forecasted. This trend affects all parts of the region, including the city of Elk Grove.

Auburn  
Citrus Heights  
Colfax  
Davis  
El Dorado County  
Elk Grove  
Folsom  
Galt  
Isleton  
Lincoln  
Live Oak  
Loomis  
Marysville  
Placer County  
Placerville  
Rancho Cordova  
Rocklin  
Roseville  
Sacramento  
Sacramento County  
Sutter County  
West Sacramento  
Wheatland  
Winters  
Woodland  
Yolo County  
Yuba City  
Yuba County

Donald J. Lockhart, AICP  
Page 2  
May 18, 2011

SACOG Projections for Preliminary Draft Preferred Scenario for the 2035 MTP Update


	2008 Employees	2008 Housing Units	2035 Employees	2035 Housing Units
City of Elk Grove (current City limits)	28,431	49,018	48,429	66,014

As we indicated in prior communications, we believe our estimates of development capacity inside current city boundaries are likely to be low because they do not account for any redevelopment activity. Over the next two to three decades, some level of redevelopment seems highly likely. In fact, the City is working hard to encourage this as a revitalization strategy.

To summarize, neither the currently adopted MTP projections nor the draft Preliminary Preferred Scenario projections being used in the MTP update assume growth in the proposed SOI area. To be clear, the purpose of the MTP is to forecast actual constructed development during the planning period. This is different from a land supply contingency needed to support a healthy land market. We agree that Elk Grove may need additional land outside of the current city limits at some point beyond 2035 to support additional job growth to help the City's current imbalance of jobs and housing. We do not see a need for land in the SOI for housing for a very long time. The key issues around such an expansion would involve the timing of urbanization and conditions for development.

Thank you for consideration in this matter.

Sincerely,



Mike McKeever  
Chief Executive Officer

MM:KL:ef

Attachment



February 28, 2011

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

RECEIVED

MAR 02 2011

SACRAMENTO LOCAL AGENCY  
FORMATION COMMISSION

Dear Mr. Lockhart,

Thank you for inviting SACOG's comments on the Elk Grove Municipal Service Review for the Elk Grove Sphere of Influence Amendment Project (L AFC 09-10) and the support Elk Grove Market Study. We also thank the City of Elk Grove for commissioning the market study to determine the long term land use needs of the City. SACOG supports the City's aim to improve job opportunities in its jurisdiction and this market study is an important step toward that end. We also appreciate that the City asked its market study consultant team to meet with us to discuss and compare employment projections. We've since reviewed the final market study and find it to be a technically solid study of employment demand.

Our understanding of the market study is that it projected two potential growth scenarios – a low growth, high density scenario and a high growth, low density scenario – for the City of Elk Grove through the year 2029. The scenarios are intended to bracket the range of possible employment and housing growth that the City would need to plan for during that time period, including the amount of land that would need to be available to support that growth. The study states that these scenarios are intended to provide varying estimates of growth potential, but “are not meant to incorporate judgments about the likelihood of projections results or embedded assumptions” (Page A-14, Elk Grove Market Study). We have compared the market study to our preliminary MTP projections and generally agree that it is possible the city could need more employment land beyond the city limits sometime after the next 20 years and that the amount of land likely to be needed is within the amount identified by the Elk Grove Market Study. We do have a few observations as to the reason for some of this additional land supply:

- The market study discounts 80% of vacant unentitled land as unlikely to develop fully.
- The market study assumes very low residential densities for the high land consumption scenario (Scenario 2), at approximately 6.5 dwelling units per acre on average city-wide, which contributes substantially to the scenario's higher land demand.

Auburn  
Citrus Heights  
Colfax  
Davis  
El Dorado County  
Elk Grove  
Folsom  
Galt  
Isleton  
Lincoln  
Live Oak  
Loomis  
Marysville  
Placer County  
Placerville  
Rancho Cordova  
Rocklin  
Roseville  
Sacramento  
Sacramento County  
Sutter County  
West Sacramento  
Wheatland  
Winters  
Woodland  
Yolo County  
Yuba City  
Yuba County

Donald J. Lockhart, AICP

Page 2

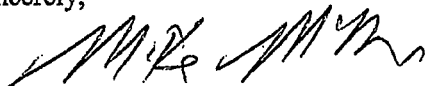
February 28, 2011

- The market study assumes no redevelopment potential in its land supply analysis.
- The market study land supply analysis assumes no re-designation of vacant land, either from residential to employment or between employment designations. With no re-designation of land use assumed, the market study indicates that the employment acres in shortest supply are for institutional and school uses, which are public, not private uses.
- The market study arrives at land demand by adding an additional 20% of land capacity as a land supply contingency. Of the additional land needed in Scenario 1 (low growth, high intensity development), 100 percent of the 200 acre additional land supply is part of this contingency. For Scenario 2 (high growth, low intensity development), about 53% of the additional 1,422 acre additional land supply is part of this contingency. It is worth noting that this aspect of the land demand projections is different from SACOG's land use forecasts, which must represent actual anticipated development.

Lastly, as you know, SACOG is in the midst of the Rural-Urban Connection Strategy (RUCS) project, which focuses on economic and environmental sustainability in the region's rural areas. The project has not yet resulted in policy or program recommendations but we have been conducting groundbreaking technical research on the urban-rural interface and in particular, the effects of urban uses on neighboring agricultural use. Our preliminary research and modeling indicates that the more certainty there is to the edge of future urbanization, the lesser the impact will be on neighboring farming operations. A higher percentage of land is more likely to remain in active agriculture if there is some long-term certainty that farming is an economically viable use of the land.

Thank you again for inviting SACOG's comment in this process. We would be happy to discuss any of this information in more detail with the City and LAFCO if it would be of use.

Sincerely,



Mike McKeever  
Chief Executive Officer

MM:KL:ef



August 13, 2008

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

Dear Mr. Brundage:

I am writing to comment on the City of Elk Grove Sphere of Influence  
Amendment Request (LAFCO 04-08). The application's "Municipal Service  
Review" document refers to SACOG projections, stating that:

*"The City based future land demands on SACOG's projections to estimate  
the amount of vacant lands necessary to accommodate the projected  
growth." (p. 3.0-3)*

*"SACOG anticipates that existing neighborhoods and subdivisions within  
the City are expected to build out in the vacant areas within SACOG's (2035  
Metropolitan Transportation Plan) planning period." (p. 3.0-2)*

I don't believe that these statements accurately convey SACOG's adopted  
growth projections for Elk Grove. Our recently adopted 2035 Metropolitan  
Transportation Plan land use allocation shows all of the projected housing and  
employment growth for Elk Grove through 2035 occurring within the existing  
city limits, with an additional 1,700 acres of vacant land in 2035 that the City's  
General Plan currently designates for development. Additionally, within the  
city limits the 2050 Blueprint growth pattern projects another 19,000 employees  
and 1,500 housing units from 2035 to 2050. These figures were carefully  
coordinated with Elk Grove staff when the final Blueprint map was created  
because the City Council had asked SACOG to ensure complete consistency  
between the Blueprint map and the City's recently adopted General Plan. We  
had communicated our concerns about these issues to the City in the attached  
letter dated January 23, 2008.

Recently, SACOG met with Elk Grove senior management staff and consultants  
to discuss these issues and agreed that our staff would meet in the near future to  
compare information and hopefully resolve, within the next few weeks, the  
discrepancies noted above. We will keep you posted on the progress of those  
discussions.

burn  
tus Heights  
yria  
vis  
Dorado County  
Grova  
som  
L  
tain  
coln  
Oak  
mis  
ysville  
er County  
er-ville  
cho Cordova  
klin  
eville  
rairenta  
anento County  
er County  
t Sacramento  
otland  
ters  
dland  
County  
City  
County

Peter Brundage, Executive Officer

Page 2

August 13, 2008

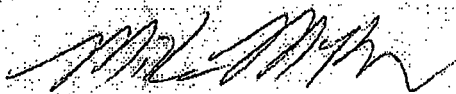
I have indicated to City staff that as they move forward to establish a Sphere of Influence, we encourage them to consider:

- the timing of urbanization in the Sphere of Influence and its possible impact on the build-out of the General Plan within the city's current municipal boundaries; and,
- focusing on jobs-housing balance and prioritizing future development that promote employment growth and development of a strong economic base for the City.

These issues matter to SACOG because of their strong connection to travel behavior and air emissions. I believe City leadership shares these concerns and we look forward to a good partnership working with them on these issues as this process moves forward.

Thank you for your consideration on this matter. Please let me know if you have questions.

Sincerely,



Mike McKeever  
Executive Director

MM:JH:ef

cc: Laura Gill, Elk Grove

S:\Projects\07-08\0501-Blueprint\Brundage\tr.081308.doc

