

Brundage. Peter

From: Bill Kutzer [kutzerb@frontiernet.net]
Sent: Tuesday, August 18, 2009 6:54 AM
To: Commission. Clerk
Cc: Hume Pat; Scherman, Sophia; Cooper Jim; Gary - Davis; Detrick Steve; Nottoli. Don; Schutten. Terry; Brundage. Peter; Lockhart. Don; Echiburu Taro; Hazen Don; Gill Laura; Blacklock Patrick; Matthew Baker; Burness Rob; holtart4u@yahoo.com; Radmacher. Richard (MSA); Ford Linda
Subject: Elk Grove SOI

Hi Diane,

Please forward the letter copied/pasted below to the Commissioners.

Thank You.

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To Whom It May Concern:

The attached flyer was prepared by the Wilton Action Group (WAG) to address continuing concerns about the approach the City of Elk Grove is taking toward expanding the City's Sphere of Influence (SOI). This flyer supplements a flyer WAG sent out in July. It calls upon the City Council to carefully study the lessons of the City of Folsom's recently completed SOI expansion with the aim of avoiding a waste of time and money by taking steps to "right size" the SOI application being submitted to the Local Agency Formation Commission (LAFCO). Right sizing is the term Elk Grove City staff applies to the process of bringing City programs into line with current City budget requirements. In the case of the SOI application, this process would involve the following steps:

- Eliminating the floodplain from the SOI. This element of the application provides minimal benefit to the City but exposes the SOI expansion process to significant controversy that is likely to add substantial time, cost and uncertainty to the process.
- Getting the land use projections cited in the SOI application in order. As presently presented, the City's estimate of its acreage needs for accommodating future residential and employment growth is grossly inflated and lacks credibility. This deficiency will add to the controversy surrounding the SOI expansion process and increase the potential for delay, unnecessary expenditure and uncertainty.

We are hopeful that decision makers with a role to play in this process will consider these concerns and we look forward to playing a constructive role in helping Elk Grove get its SOI application right-sized before more of the City's time and money is unnecessarily wasted.

Elk Grove: Stop Wasting Time & Money....."Right-Size" the SOI

The Elk Grove City Council should learn the lessons of the 10-year SOI expansion process recently completed by the City of Folsom (Folsom) and get the size of its own SOI expansion process right. What can be learned from Folsom's experiences?

Lesson 1: Don't Overreach – Eliminate the Floodplain from the SOI

Folsom initiated its SOI expansion project in 1997 with an attempt to push its SOI south across Highway 50 and west all the way to Rancho Cordova, encompassing an area of almost 30,000 acres. Like Elk Grove's attempt to claim the Cosumnes River floodplain, this expansion greatly overreached anything remotely related to Folsom's actual growth needs. After two years, Folsom was forced to reduce the size of its proposed expansion to 3,500 acres, a 90% reduction! Elk Grove is bound to experience a similar waste of time and money unless the City eliminates the Cosumnes River floodplain from its SOI amendment.

Lesson 2. Get the Land Use Projections Right

The heart of an SOI amendment is a set of well-supported land use projections that demonstrate how much land is needed to accommodate future population and employment growth. Once Folsom was forced to reduce the size of its SOI expansion, they adopted land use projections that were consistent with those recommended in the Sacramento Area Council of Government's preferred regional Blueprint. Folsom concluded that it could accommodate up to 30,000 new residents on about 1,160 acres. By comparison, Elk Grove's SOI amendment application claims that the City needs 12,587 acres to accommodate an increase in population of 41,000 people over the next 25 years.

Residential Land Use Condition	Folsom SOI	Proposed for Elk Grove
Housing units/acre	10	1.5
People/acre	25	4

Elk Grove's proposed future housing density is less than half that of the current population of the City, which includes a significant rural residential area with very low density (1 unit on 2 acres), and is only a fraction of the density proposed in the Folsom SOI.

With respect to employment, Folsom concluded that it could accommodate up to 10,300 new employees in new commercial/retail and office uses covering about 450 acres. Elk Grove's application claims that the City needs 4,608 acres to accommodate 31,639 new employees. Elk Grove's density is about 40 percent of the employment density anticipated by the Folsom SOI expansion.

Elk Grove's land use analysis is out of line with current regional planning benchmarks and with emerging State requirements

Non-Residential Land Use Condition	Folsom SOI	Proposed for Elk Grove
Employees / acre	23	9

(Senate Bill 375) for reducing greenhouse gases. The analysis contains numerous methodological errors that significantly inflate the amount of land the City actually needs to accommodate its projected population growth and improve its jobs housing balance.

These errors should be corrected and the analysis should be revised before the Local Agency Formation Commission (LAFCO) is asked to proceed with the SOI amendment. Otherwise, like the initial version of Folsom's SOI amendment, the Elk Grove SOI expansion will justifiably be perceived as a prescription for urban sprawl and the City will be compelled to restructure the amendment after unnecessarily wasting time and money on the current poorly prepared application.

Estimates of actual vs. asserted land use needs (2035)		
<i>Acreage Needed thru 2035</i>	<i>Elk Grove's estimates</i>	<i>WAG's estimates</i>
Residential acres	12,587	2,300
Non-residential acres	4,608	1,000
Grand Total	17,195 acres	3,300 acres
Current vacant acres	5,200 acres	--

NOTE: WAG's estimates are based on a residential density of 9 housing units per acre, 23 people per acre, and a non-residential density of about 40 employees per acre associated primarily with office development. It was assumed that 23% of the land allocated to residential and non-residential uses would be occupied by roads, sidewalks, parks and other public infrastructure. Vacant acres estimated based on verbal communications with Elk Grove Planning Dept. staff.

Even if Elk Grove projects their needs out to 2060, as Mayor Hume has suggested, the City should not need more than roughly 6,600 acres, or about 1400 acres outside the current city limits.

Lesson 3: Settle with the County before Initiating the Environmental Review Process

One of Folsom's biggest problems was commencing the SOI amendment process, including the environmental review, before reaching agreement with the County on key elements of the SOI expansion. Most notably, the environmental review process was initiated without an agreement with the County on how important environmental resources in the SOI area would be protected. This caused a two-year delay in the amendment process. Elk Grove should not make the same mistake. Before asking LAFCO to initiate the environmental review process, the City should complete its negotiations with the County and agree upon the following: (a) appropriate protections for the floodplain, and (b) clearly defined mechanisms for landowners east of Grantline Road to develop those areas of their property outside the floodplain, should they wish to do so.

In Summary

By 'right-sizing' the SOI's projected land uses requirements, including dropping the floodplain from application and reaching agreement with County up front, the City can avoid the long drawn out and expensive process that Folsom experienced. This will avoid unnecessary expenditures of time and money on the SOI expansion at a time when other City projects and programs that affect the immediate needs of City residents are being cut.

