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**Sacramento Local Agency Formation Commission (LAFCo)**  
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**Re: MUNICIPAL SERVICE REVIEW for the PROPOSED KAMMERER/99 SPHERE OF INFLUENCE AMENDMENT APPLICATION to the CITY OF ELK GROVE**

Dear Mr. Lockhart,

This letter provides comment from the Environmental Council of Sacramento (ECOS) and Habitat 2020 regarding the Municipal Services Review (MSR) for the Kammerer/99 Sphere of Influence Amendment Application (SOIA) to the City of Elk Grove.

ECOS, a 501c3 organization, and Habitat 2020, the Conservation Committee of ECOS, are partner coalitions dedicated to protecting the natural resources of the greater Sacramento region. ECOS member organizations include: 350 Sacramento, Breathe California of Sacramento-Emigrant Trails, Friends of Stone Lakes National Wildlife Refuge, International Dark-Sky Association, Los Rios College Federation of Teachers, Mutual Housing California, Physicians for Social Responsibility Sacramento Chapter, Preservation Sacramento, Resources for Independent Living, Sacramento Audubon Society, Sacramento Housing Alliance, Sacramento Natural Foods Co-op, Sacramento Valley Chapter of the California Native Plant Society, Sacramento Vegetarian Society, Save Our Sandhill Cranes, Save the American River Association, SEIU Local 1000, Sierra Club Sacramento Group, The Green Democratic Club of Sacramento, and the Wellstone Progressive Democrats of Sacramento.

Members of Habitat 2020 include the Sacramento Audubon Society, California Native Plant Society, Friends of the Swainson's Hawk, Save the American River Association, Save Our Sandhill Cranes, Sierra Club Sacramento Group, Friends of Stone Lakes National Wildlife Refuge, and the Sacramento Area Creeks Council.

While we have many concerns about the Elk Grove expansion proposal, with regard to the MSR our primary concern is future water supply. Water is an essential service for prospective urban development and an important factor in the LAFCo approval process. The availability of water to meet the competing needs of habitat, agriculture and urban uses is an ongoing and increasingly acute issue in the Sacramento region and elsewhere in the state. This is one of the threshold issues facing LAFCo, and we feel that the prospects of future water supply to this area have not been adequately analyzed or illustrated in the MSR.

The Municipal Service Review notes (page 18) that the Sacramento County Water Agency's (SCWA) boundary extends to the north boundary of the Kammerer SOIA and, though not stated specifically, presumes SCWA as the logical service provider. We agree with that assumption, though the proposed expansion area lies outside of the long-accepted Urban Services Boundary (USB), a boundary that the Water Forum agreement is also predicated upon. Expansion of this boundary is of great concern to ECOS and Habitat 2020.

The MSR recognizes that the Water Forum agreement establishes a long term annual sustainable yield from the South American River Sub-basin of 273,000 acre-feet. It goes on to note that there is a significant cone of depression in groundwater elevations centered near Elk Grove and that the Central Sacramento Groundwater Authority (SCGA) has adopted a management plan to address the issue.

Stability of the groundwater basin is of course of primary importance, and recent passage of the Sustainable Groundwater Management Act of 2014 (SGMA) provides an unprecedented regulatory process to ensure the stability of our ground water in California. However, implementation of this process is only in its nascent stages in the South American Sub-basin. SCGA has recently proposed that its 2006 Groundwater Management Plan (GMP) be adopted as an acceptable alternative under the law as a suitable plan. However, a determination of the suitability of this plan has yet to be made, and the GMP's handling of the cone of depression around Elk Grove is a particular point of debate. These determinations must be made and a groundwater plan must be adopted under SGMA before any consideration of an expansion of SCWA's service beyond the current Urban Services Boundary is made.

While the SCWA may be the most efficient provider of water to the area, and may have enough water to do so today, the MSR does not at all address the feasibility of SCWA's ability to provide municipal and industrial water to the Kammerer Road SOIA in the future in addition to other development already approved by the Sacramento County General Plan, including multiple specific plans already adopted or in process in Zone 40 (which would now include this expansion).

**The Sacramento County General Plan Update adopted in 2011 clearly acknowledges a 4,913 Acre Feet Annual (AFA) shortfall of supply in Zone 40 at build-out of the plan:**

As described in the Setting section, the current Zone 40 yield is 131,727 AFA. The water demand from the cities plus from the 1993 General Plan (equivalent to the Zone 40 Water Supply Master Plan) is 103,712 AFA, and the water demand from the cities plus the No Project is 109,922. Both of these amounts can be accommodated by current projected water yields. However, with the [General Plan Update] the demand increases to 136,640 AFA, which is approximately 4,913 AFA beyond projected supply and well beyond the amount planned for 2030 distribution in the Zone 40 Water Supply Master Plan. (2006 Sacramento County General Plan Update (2011), pg 6-47)

The General Plan presents a range of possible strategies to make up that shortfall, but the viability of these strategies remain speculative. A supply must be demonstrably secured before a SOI expansion is granted that would entail the expansion of the USB. While LAFCo has contended in the past that they are not required to analyze the findings of the plans of potential service

providers, a lack of acknowledgment of this basic conflict with the County's General Plan is irresponsible and runs contrary to the mission of LAFCo.

This is a threshold question in considering approval of the SOIA request—How will SCWA supply (an approximated) 2185 AFA of additional water to Elk Grove if it does not have enough water for its existing adopted plan at build out in 2030?

For far too long, land use decisions have assumed adequate water availability to supply development. As the MSR notes, state law now requires such findings, but those findings come late in the development process, when the fundamental urbanization question has already been decided, alternative land uses have been foreclosed, and mitigation options have been narrowed. Because the proposed SOIA request would lead to urban growth beyond any area previously considered for urban development, Sacramento LAFCo must address this key issue for the SOIA, not at annexation.

Both the MSR and the EIR for the SOIA request must adequately address the sufficiency of SCWA's available water supply to accommodate, within the Sustainable Yield requirements of the Water Forum Agreement, both the water requirements of the expansion area and the water requirements at buildout within SCWA's existing boundaries.

This analysis needs to be thorough, logically presented and comprehensible. ECOS and Habitat 2020 stand ready to engage with LAFCo staff in how to develop this essential information.

Sincerely,



Brandon Rose  
ECOS Board President



Rob Burness  
Co-Chair Habitat 2020