



ECOS
ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO



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November 23, 2015

Attn: Mr. Peter Brundage
AICP, Executive Officer
Sacramento Local Agency Formation Commission (LAFCo)
11121 I Street, suite 100
Sacramento, CA 95814-2836

SENT VIA EMAIL (Peter.Brundage@saclafco.org)

RE: Comments on Notice of Preparation for proposed Elk Grove Sphere of Influence Amendment and multi-sport park complex

Dear Mr. Brundage:

This letter provides initial comments from the Environmental Council of Sacramento (ECOS) and Habitat 2020 (H2020) in response to a notice of preparation application for the proposed Elk Grove Sphere of Influence Amendment and multi-sport park complex. ECOS' membership 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 (formerly known as Sacramento Old City Association), Resources for Independent Living, Inc. (RIL), Sacramento Audubon Society, Sacramento Housing Alliance (SHA), Sacramento Natural Foods Co-op, Sacramento Valley Chapter of the California Native Plant Society, Sacramento Vegetarian Society, Save Our Sandhill Cranes (SOS Cranes), Save the American River Association (SARA), SEIU Local 1000 (Environmental Committee), Sierra Club Sacramento Group, The Green Democratic Club of Sacramento, and the Wellstone Progressive Democrats of Sacramento.

Habitat 2020 (H2020) is a coalition of environmental organizations collaborating on common issues in and affecting, the Sacramento region. 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.

Alternative sites need to be evaluated in the EIR

From a land use and transportation standpoint, the area the City of Elk Grove proposes to annex is a poor choice for a soccer complex. For use by soccer teams from Elk Grove that use the complex for practices and games, the complex would be better located closer to the center of the community, to reduce travel times and vehicle miles travelled. For use in tournaments and league games involving other teams from the Sacramento region, sites further north would reduce travel times and distances. For major tournaments, involving teams from outside the

Sacramento region, the site is particularly inconvenient, as it is not located near services on which the teams depend, including hotels and restaurants. The site will either result in additional vehicle miles travelled, as compared to other sites closer to these businesses, or induce development of these kinds of commercial development closer to the site of the complex, which is a growth inducing impact of the project that will need to be analyzed in the DEIR. Either way, the complex will have significant adverse environmental impacts that could be avoided by choice of a more appropriate site. The choice of a site on the urban fringe also means that the site will not be served by transit, which will result in transportation and air quality impacts that could be avoided by choosing a site better able to make use of transit services.

The problems are similar if the site is used for a stadium. If a stadium is located along a transit corridor, a substantial number of the trips to games can be accommodated by transit, reducing congestion and vehicle miles traveled. But a stadium alone will not support transit. Nor will a stadium on the urban fringe support the game day experience possible where the stadium is in the urban core, allowing fans to transit to near the stadium, meet fellow fans at nearby bars and restaurants, and march together to the stadium.

The environmental impact report should consider alternative sites for the soccer complex that will allow for shorter trips to the complex, closer proximity to hotels and other services relied on by visiting teams participating in tournaments, and accessibility to transit.

Biological resource considerations

The environmental impact report should consider the unique geographic placement of this site in relation to both the Stone Lakes National Wildlife Refuge to the West and the Cosumnes River Preserve to the South. The EIR should consider impacts to the many species that roost, or spend the night, in these large protected areas that then forage in the site under consideration for at least some portion of their natural history.

The EIR should consider the significance of the site as upland forage for species displaced during the cyclical flooding events that occur every seven to ten years in and around the Cosumnes River Preserve. For many species, such as the Greater Sandhill Crane, a large proportion of the habitat conserved for them will be temporarily unavailable during these stochastic events. Roosting is not such a concern because the cranes can utilize the shallow water along the margins of the floodplain. However, much of their traditional foraging grounds will be inaccessible. The upland areas, then, in any reasonable proximity to the floodplain take on significant importance. The EIR should analyze the impact on species from the loss of this important upland foraging area.

We would caution against using any portion of the biological resource chapter from the discredited Brandman and Associates' DEIR and RDEIR for the recently denied Elk Grove SOIA application to LAFCo. The chapter had so many flaws and inaccuracies that it should be completely avoided. As well, given the scandal over the Grasslands Solar debacle in Davis that relied upon what was characterized as a fraudulent EIR prepared by Brandman and Associates, any reuse of their work would be imprudent.

We would also caution on relying too heavily upon the California Natural Diversity Database (CNDDDB) for species occurrences in the site under consideration. The CNDDDB is a notoriously incomplete database, and particularly for avian species it is weighted heavily towards nesting data rather than foraging or simple occurrence data. There are many listed species and species of concern that regularly occur in and in the vicinity of the site under consideration that do not nest there. It would be prudent to balance the CNDDDB with data from eBird and the local Christmas counts in the area, as well as the species lists for both the Stone Lakes National Wildlife Refuge and the Cosumnes River Preserve. If a species occurs in either of those protected areas and uses the equivalent land cover types as those present in the site under consideration, chances are good that it is present there.

Considerations regarding light pollution

Because artificial light at night is both cumulative and significant, consideration of lighting in this and other areas of the city and county as well as adjacent uses must be considered and mitigated, including their present and future uses and effects.

Numerous studies have shown that artificial light at night has many negative and deadly effects on many types of wildlife including birds, amphibians, insects, fish and mammals. These impacts should be fully analyzed.

Based on negative impacts from encroachment of night time light into or beyond the FEMA Floodplain limit of Deer Creek and Cosumnes River and the Cosumnes River Corridor, the DEIR should be sure to evaluate both the no project and alternative project scenarios with this lighting concern in mind. For fully purpose of protecting listed species, it can argued that not only should artificial lighting be avoided in the area of this site, but its total exclusion from this area should be mandatory.

Encroachment of night time light into Cosumnes River Preserve and Stone Lakes Preserve to the south and west should also be analyzed and the impacts of the light to the species there should be fully discussed.

Natural floodplains such as those near the project site are rich biologically productive ecosystems, encroachment of the most minute night time light can impact species such as zooplankton, terrestrial invertebrates and many other. These impacts should be analyzed in the DEIR. It should be noted that approximately 30% of vertebrates and 60% of invertebrates are nocturnal and therefore can be highly influenced by the presence of artificial light at night. The Cosumnes River is the only remaining unregulated river on the western slope of the Sierra Nevada. Therefore, its riparian and floodplain habitats are critical resources locally and downstream to the Delta's native species by enhancing the estuaries food web.

These areas south, east and west of proposed expansion of the SOI are without question environmentally sensitive and areas adjacent to it should be areas in which permanent lighting is not expected and when used, is limited in the amount of lighting and the period of operation.

The special content of spill light can also be a factor, blue rich white light has been shown to scatter more in the atmosphere and create a slyer glow. Sky glow can eliminate monthly variations in light levers essential to biological mechanisms. Night time cloudy conditions presents additional concerns as clouds have been shown to increase ambient light levels by a factor of 10. Light levels equivalent to that of the half-moon have been identified as disruptive, spill light from this the proposed SOI could easily exceed these levels.

In one plan to support Swainson's hawk, seasonal wetlands such the adjacent flood plain provide overwinter refuge for rodents to provide source prey populations. Rodents are especially sensitive to stray light into their habitat.

Stray light of similar intensity to moonlight can cause rodents and other nocturnal mammals to reduce their activity, movement, restricting foraging activity, and food consumption. Rodents and other nocturnal mammals respond to stimuli equivalent to that of a half-moon (0.1 lux) as well as a full moon (0.3 lux). Rodents most nocturnal mammals experience disruption of the circadian clock at very low light levels, leading to disruption of annual changes in body mass, hormones, reproductive status, hibernation, and other activity patterns.

Thus local Swainson's hawk foraging may be influenced and degraded by the degraded fitness and availability of pray species such as rodents.

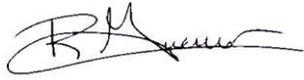
All of these factors are of special concern with the advent of LED outdoor lighting which if not selected properly can contain excessive blue light content. Duration as well as dosage can be a factor, a single artificial light at night may disrupt important ecological functions over a wide spread area, if this disruption is long lasted it can have even more serious consequences. The analysis of lighting impacts should include the use of this particularly impactful type of artificial lighting.

Conclusion

ECOS and Habitat 2020 are far from convinced that the use of this site for a multi-sport complex is warranted based upon the significant impacts that will result from its development. We would caution LAFCo that many of the significant impacts could be completely avoided with a more northerly or central location being chosen as an alternative site.

We would also caution LAFCo that it is unclear whether there is any available municipal funding to make this complex a reality, and once the sphere increase and the annexation are granted, LAFCo will have no regulatory nexus to inhibit a typical low density sprawl development replacing this complex. As well, even if the complex does become a reality, for reasons already discussed, the complex would be a major growth inducer for further development into the important agricultural and natural open spaces south of the city. We see no justification for utilizing a biologically significant greenfield at the absolute margin of the existing city when more suitable infill opportunities exist which would avoid all of the impacts associated with this site.

Sincerely

A handwritten signature in black ink, appearing to read "Rick Guerrero". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rick Guerrero, President, Environmental Council of Sacramento

Rob Burness, co-chair, Habitat 2020