



SACRAMENTO COUNTY FARM BUREAU

8970 Elk Grove Boulevard • Elk Grove, California 95624-1946
(916) 685-6958 • Fax (916) 685-7125

March 19, 2012

Gay Jones, Chair
Sacramento Local Agency Formation Commission
1112 I Street, Suite 100
Sacramento, CA 95814

RE: Elk Grove Sphere of Influence Application

Dear Chair Jones and Members of the Commission,

The Sacramento County Farm Bureau is a non-governmental, non-profit, grassroots organization. Our purpose is to protect and promote agricultural interests throughout Sacramento County and to find solutions to the problems of the farm, the farm home, and rural communities. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

As you are aware, farmers and ranchers have testified before you in both supporting and opposing the proposed sphere of influence application by the City of Elk Grove. Some welcome the change and wish to be a part of future development, while others desire to remain under the County jurisdiction. We respect all positions and emphasize that we champion private property rights and individual decisions farmers and ranchers make regarding their land. We also strongly agree that the current Elk Grove expansion has several major flaws that go beyond the protection of private property rights and ignore good land use planning.

Farm Bureau supports local planning to accommodate orderly, logical contiguous patterns of urban development. A sphere of influence process is an appropriate tool to plan for future needs of local jurisdictions. However, Farm Bureau *cannot* support urban development of agricultural land when the need for expansion is not substantiated by credible and current projections for future urban growth.

Sacramento County Farm Bureau opposes the current SOI expansion of the City of Elk Grove to include over 7,000 acres of agriculture land. Any expansion should not exceed the number of acres projected by market studies that project future acreage needed for the City of Elk Grove to grow in an orderly and logical manner. The application fails to adequately substantiate the need for additional acreage to accommodate future development over the next 20 years. The Elk Grove Market Study released in December 2010 indicates the land supply and demand analysis supports the need for an additional 200 to 1,400 acres of land to accommodate projected 2029

To Represent and Promote Agriculture in Sacramento County

levels of demand. *(Page iii, Elk Grove Market Study, 12/29/2010.)* A draft municipal service review estimates the vacant land available is approximately 3,314 acres. *(City of Elk Grove's Draft Municipal Service Review, Sphere of Influence Amendment Area, August 18, 2010).* There appears to be little evidence to support the need for an additional 8,000 acres of land to accomplish orderly urban development.

Farm Bureau has submitted comments on the Draft Environmental Impact Report (DEIR) and we wish to take this opportunity to not only to express our opposition on the pending application but also, to reiterate the following concerns:

1. The SOI boundary extends past Sacramento County's Urban Service Boundary (USB). The USB establishes the ultimate boundary of the urban area of Sacramento County. It is intended to allow for the protection of agriculture and rangelands, critical habitat and natural resources, and directs growth within the County's Urban Policy Area (UPA). Logical, orderly planning must respect ultimate boundaries. We encourage LAFCo to examine the regional effects the SOI may have on urban planning in the County.
2. The SOI boundary east of Highway 99 and south of Grant Line Road follows an indefinable line--the floodplain. The floodplain line is not clearly marked either on the land or on a map. This arbitrary boundary would also divide parcels. This situation is extremely problematic for a number of reasons. With some landowners' farm operations (shop, barns, equipment sheds) divided between two jurisdictions, the current confusion of who provides services, such as law enforcement, would be accentuated. Divided parcels could also limit farmers' and ranchers' long-term interest in investing in their agricultural operations by potentially having to seek permits from both the County and City.
3. The SOI includes active Williamson Act contracts. It was recognized that California was losing, at a fast rate, some of the most productive farmland and diverse natural resources in the world. As a result, The California Land Conservation Act of 1965, commonly known as the Williamson Act, was enacted. This voluntary program is a contract between private landowners and the County to restrict development activities on agricultural land in return for a lower assessed property tax. LAFCo should not ignore the 2,474 acres of farmland enrolled in the Williamson Act and the commitment landowners and the County have made to the protection of these resources.
4. Farmland is irreplaceable. The SOI area currently produces \$14 million of agricultural commodities. This value does not represent further processing, transportation, marketing, jobs, tax revenues, research or development. The City's General Plan clearly disregards the loss of agricultural land as a consequence of development. In addition, Elk Grove's General Plan does not provide buffers between urban areas and agricultural operations and provides that conflicts arising between urban and agricultural uses will be addressed only through the City's "Right to Farm" ordinance. Two businesses that operate on the south side of Eschinger Road represent both national and international companies with combined

local sales of over \$20 million and employ 69 employees. Their operations would be negatively affected by urban development. The City of Elk Grove's General Plan is short-sighted and disregards the economic contributions these lands provide to the economy.

If LAFCo does not encourage efficient development regionally and require cities to make efficient use of lands already within their jurisdiction before expanding further into agricultural areas it will be impossible to protect the viability of agriculture and our incredibly productive and important family farms and ranches. Every jurisdiction, including the City of Elk Grove, must carefully consider any request to expand, annex or make land use changes. Changes to agricultural land have long-term adverse effects on wildlife, habitat, environmental sustainability, economic growth and compromise the goals and regional efforts by the County of Sacramento, Sacramento Area Council of Governments, Next Economy, and Valley Vision just to name a few groups which are working towards long-term sustainable growth. They value agriculture not only as an economic engine but also as a protector of the environment and open space.

Thank you for the opportunity to share our concerns.

Sincerely,



Kevin Steward
President



Charlotte Mitchell
Executive Director

cc. LAFCo Commissioners
LAFCo Alternate Commissioners
Peter Brundage, Executive Officer
Don Lockhard, Assistant Executive Officer
Don Nottoli, 5th District County Board of Supervisor
Mayor James Cooper, City of Elk Grove
Taro Echiburu, City of Elk Grove