



# SACRAMENTO COUNTY FARM BUREAU

PUTTING THE FOOD ON YOUR FORK SINCE 1917

August 14, 2018

Don Lockhart, AICP  
Sacramento Local Agency Formation Commission  
1112 I Street, Suite 100  
Sacramento, CA 95814

**RE: Elk Grove Sphere of Influence Amendment and Multi-Sport Complex Environmental Impact Report**

Dear Mr. Lockhart 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 amendments 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

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.

To determine that the direct and indirect loss of agricultural land, including Farmland of Statewide Importance, is considered *potentially significant* is a direct avoidance of the truth of the situation. By converting existing agricultural lands, including Farmland of Statewide Importance to nonagricultural urban uses the Commission must acknowledge that this is a significant and unavoidable impact regardless of mitigation measures.

The SOIA 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 179 acres of farmland enrolled in the Williamson Act and the commitment landowners and the County have made to the protection of these resources.



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Water resources should be of the utmost importance when considering the feasibility of this proposed project. A project of this size and scope and planned usage, will have a significant impact on the groundwater supply of that area and potentially an impact on the surrounding agricultural properties. In a time where groundwater resources are being scrutinized, monitored and measured, the potential impact on this resource is not something to be determined as a *less than significant* measure, regardless of planned mitigation.

Increased traffic flow in the immediate and surrounding areas will affect neighboring farming operations at various times throughout the growing season. The movement of agricultural vehicles, tractors and implements will be impacted with increased traffic flow to this facility, regardless of the phase of its construction or future use.

Urban development is ever encroaching on agricultural and open space lands. There needs to be consideration of a buffer zone between the urban and rural interface of this expansion. Developing a facility such as this, will increase the population in this area and without an acknowledgement of the practices on the surrounding agricultural lands, the lack of a buffer may lead to future challenges or complaints about farming practices so close to a development.

It must be stressed that this project, will directly result in the loss of prime farmland within Sacramento County. Additionally, to mitigate for this loss through simple wildlife or conservation programs does not adequately address the loss of farmland. Farm Bureau would like the Commission to acknowledge the fact that precious farmland acres will be lost if this development is approved, regardless of mitigation measures.

To protect the viability of agriculture and our incredibly productive and important family farms and ranches, LAFCo must encourage efficient development regionally and require cities to make efficient use of lands already within their jurisdiction before expanding further into agricultural areas. 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 and economic 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,

Lindsey Liebig  
Executive Director