

City Response to LAFCo Policies

The following are the City's response to LAFCo's adopted policies with regard to the proposed Project.

LAFCo Policy #	Policy Text	City Response
A. Spheres of Influence		
1.	LAFCo will approve an application for a change of organization or reorganization only if the proposal is consistent with an approved Sphere of Influence plan for the affected agency or agencies. Spheres of Influence will not generally be amended concurrently with an action of an application. Spheres of Influence amendments will ordinarily take longer to process than applications for a change of organization or reorganization. Agencies are encouraged to keep their Spheres of Influence plans up to date so that individual applications for changes of organization or reorganization are not burdened with Spheres of Influence amendment requirements. Amendments to Spheres of Influence occasioned by individual applications for changes organization or reorganization which would render the Spheres of Influence internally inconsistent or inconsistent with the other policies or standards herein will not be approved.	The requested action is a Sphere of Influence amendment. The City is not seeking a concurrent annexation to this request.
2.	Spheres of Influence are the primary planning tool for LAFCo. The LAFCo has developed standards related to the Master Service Element of any agency's Spheres of Influence. Agencies must have an updated Master Services Element which meets the following standards:	
a.	Is consistent with the Master Services Element of the Spheres of Influence of any overlapping jurisdiction	The proposed Sphere of Influence Amendment includes an accompanying Municipal Service Review.
b.	Demonstrates that adequate services will be provided within the time frame needed by the inhabitants of the area included within the proposed boundary	While no residential uses are proposed with the Project, services will be provided to the Project as part of its development. This includes the construction of water and sewer lines, roads, and electrical transmission facilities.
c.	Identifies existing land use and a reasonable projection of land uses which would occur if services were provided consistent with the updated Element	The site has historically been used for agricultural purposes. Retention of some agricultural operations, as well as a nature preserve site, are included in the Project.

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	<p>d. Presents a map that clearly indicates the location of existing and proposed facilities, including plan for timing and location of facilities</p>	<p>Please see the attached exhibit of the proposed Sphere of Influence Amendment.</p>
	<p>e. Describes the nature of each service to be provided</p>	<p>Please see the application.</p>
	<p>f. Describes the service level capacity of the service provider's facilities</p>	<p>Please see the Municipal Service Review.</p>
	<p>g. Identifies the anticipated service level to be provided</p>	<p>Services will be limited to the Project area.</p>
	<p>h. Describes any actions, improvements, or construction necessary to reach required service levels, including costs and financing methods</p>	<p>The City anticipates construction of various roads, water, sewer, and storm drain facilities, and electrical and natural gas services. Phase 1 construction costs for the Multi-Sport Park Complex are estimated to be under \$40 million. Financing may be through municipal bonds or other mechanism.</p>
	<p>i. Provides copies of district enabling legislation pertinent to the provision of service levels, including costs and financing methods</p>	<p>Please see the Municipal Service Review.</p>
	<p>j. Identifies projected revenue and identifies savings occurring as a result of the action</p>	<p>The proposed Multi-Sport Park Complex is a City facility. Financing information will be provided with the annexation application.</p>
	<p>k. Provides existing and five year population projections within agency boundaries</p>	<p>Please see the Municipal Service Review.</p>
<p>3.</p>	<p>The LAFCo will require that any agency making a proposal for action through LAFCo must have an updated Master Service Element of its Spheres of Influence Plan. The LAFCo will approve a proposal only if the proposed service provider is the most efficient provider of services with an acceptable cost, as demonstrated in the provider's Master Service Element</p>	<p>A Municipal Service Review has been drafted for this application.</p>
<p>B. Conformance with Applicable General and Specific Plans</p>		
<p>1.</p>	<p>LAFCo will approve changes of organization or reorganization only if the proposal is consistent with the General Plan and applicable Specific Plans of the applicable planning jurisdiction</p>	<p>The proposed Project includes a General Plan amendment and rezoning to accommodate the Project.</p>
<p>2.</p>	<p>For purposes of the above policy, the applicable planning jurisdiction is as follows:</p>	
	<p>a. For annexations to a city, the applicable jurisdiction is the city to which annexation is proposed.</p>	<p>The City will undertake these actions.</p>

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	<p>b. For applications for annexation to or detachment from a district all of whose territory lies within an adopted Sphere of Influence of a city, the General Plans of the city</p>	<p>The requested action is a Sphere of Influence amendment. The City is not seeking a concurrent annexation to this request.</p>
	<p>c. For an application for annexation to a special district for lands outside an adopted city Sphere of Influence, the Sacramento County General Plan</p>	<p>The requested action is a Sphere of Influence amendment. The City is not seeking a concurrent annexation to this request.</p>
	<p>d. For an application for annexation or detachment from a district whose territory lies in both the city and the unincorporated area of the county, the General Plan of the city unless the project lies outside of the city's Sphere of Influence; and</p>	<p>The requested action is a Sphere of Influence amendment. The City is not seeking a concurrent annexation to this request.</p>
	<p>e. For applications for incorporations, this standard is inapplicable</p>	<p>This is not an application for incorporation.</p>
<p>3.</p>	<p>For purposes of this standard, the proposal shall be deemed consistent if the proposed use is consistent with the applicable General Plan designation and text, the applicable General Plan is legally adequate and internally consistent and the anticipated types of services to be provided are appropriate to the land use designated for the area</p>	<p>The proposed Project is consistent with the proposed General Plan land use designation. See accompanying General Plan consistency discussion.</p>
<p>4.</p>	<p>The governing body of the applicable planning jurisdiction shall recommend by resolution whether the proposal meets all applicable consistency requirements of state law, including internal consistency. LAFCo shall retain jurisdiction to determine consistency pursuant to its jurisdiction to approve, disapprove or condition changes of organization or reorganization and may require additional information if necessary.</p>	<p>The proposed Project is consistent with the proposed General Plan land use designation. See accompanying General Plan consistency discussion.</p>
<p>C. Boundaries</p>		
<p>1.</p>	<p>LAFCo will not accept as complete any application for a proposal unless it includes boundaries that are definite, certain, and fully described.</p>	<p>The proposed boundaries for the Sphere of Influence Amendment have been identified based upon LAFCo policies and direction from the Commission.</p>
<p>2.</p>	<p>The LAFCo will approve only applications with boundaries that do the following:</p>	
	<p>a. Seek to correct where relevant illogical boundaries within the affected agency's Sphere of Influence</p>	<p>This situation is not applicable.</p>
	<p>b. Provide for a mixture of revenue producing and non- or limited-revenue producing properties; and</p>	<p>The proposed boundary includes various properties that, under the Project, will be zoned for commercial, industrial, and civic uses.</p>

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	<p>c. Follow where relevant natural or man-made features and include logical service areas</p>	<p>The proposed boundaries for the Sphere of Influence Amendment are the existing City limits and the County's Urban Services Boundary.</p>
<p>3.</p>	<p>The LAFCo will not approve applications with boundaries which:</p>	
	<p>a. Split neighborhoods or divide an existing identifiable community, commercial district, or other areas having a social or economic identity;</p>	<p>The proposed Project does not divide a neighborhood. The nearest unincorporated neighborhood/community is Wilton, which is east of the site across the Cosumnes River.</p>
	<p>b. Result in islands, corridors or peninsulas of incorporated or unincorporated territory or otherwise cause or further the distortion of existing boundaries;</p>	<p>The proposed Sphere of Influence Amendment boundary, as requested by LAFCo, does not result in any islands, corridors, or peninsulas of incorporated or unincorporated territory.</p>
	<p>c. Are drawn for the exclusive purpose of encompassing revenue-producing territories;</p>	<p>The proposed Sphere of Influence Amendment boundary is drawn specifically for the Project as requested by LAFCo.</p>
	<p>d. Create areas for which it is difficult to provide services; or</p>	<p>The proposed boundary will not be difficult to serve as urban services are available along the Project's frontage at Grant Line Road.</p>
	<p>e. Split parcels.</p>	<p>The proposed boundary does split parcels based upon the boundary of the County's Urban Services Boundary. An exception to this requirement is necessary.</p>
<p>4.</p>	<p>LAFCo will make exceptions to the requirements of this standard only if the exception:</p>	
	<p>a. Is rendered necessary due to unique circumstances;</p>	<p>The exemption to the split parcel policy is necessary based upon the configuration of the County's Urban Services Boundary. The City does not desire to include any area beyond the Urban Services Boundary.</p>
	<p>b. Results in improved quality or lower cost of service available to the affected parties; or</p>	<p>The proposed Project will improve recreational services for area residents. Land uses for adjoining lands within the Project area include commercial and industrial, which provide employment opportunities.</p>
	<p>c. There exists no feasible and logical alternative.</p>	<p>There are no feasible or logical alternatives to the requested boundary without exceeding the limits of the County's Urban Services Boundary.</p>
<p>D. Revenue Neutrality</p>		<p>This is an application for a Sphere of Influence Amendment; therefore, these policies are not applicable.</p>

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E. Agricultural Land Conversion		
1.	LAFCo will approve a change of organization or reorganization which will result in the conversion of prime agricultural land in open space use to other uses only if the Commission finds that the proposal will lead to the planned, orderly and efficient development of an area.	The Project site includes land designated Farmland of Statewide Importance, Farmland of Local Importance, and Grazing Land. However, the proposed Sphere of Influence boundaries are logical and orderly as the expansion is adjacent to existing urban development and the area is within the County's Urban Services Boundary.
2	LAFCo will not make the affirmative findings that the proposed development of the subject lands is consistent with the Spheres of Influence in the absence of an approved Sphere of Influence Plan. LAFCo will not make the affirmative findings that insufficient vacant non- prime land exists within the Spheres of Influence Plan unless the applicable jurisdiction has:	The City's current Sphere of Influence is coterminous with the City limits.
	a. Identified within its Spheres of Influence all "prime agricultural land" as defined herein.	The City has reviewed the State's Important Farmland Map for 2012 and has determined that there are limited areas of the City designated as Farmland of Statewide Importance (mostly in the Sheldon area). The majority of the undeveloped City is designated as Farmland of Local Importance or Other Land.
	b. Enacted measures to preserve prime agricultural land identified within its Sphere of Influence for agricultural use.	The City has adopted policies retaining the rural character of the Sheldon Area and promotion of the area for farming operations. Within the proposed Project, an area is identified for the retention of agricultural operations.
	c. Adopted as part of its General Plan specific measures to facilitate and encourage in-fill development as an alternative to the development of agricultural lands.	The City has adopted policies for the development of land with the current City limits. The Sphere of Influence amendment is proposed for the Multi-Sport Park Complex. The additional lands were added at the request of LAFCo and adjoining property owners. As discussed in the application, the City was unable to identify a site for the Multi-Sport Park Complex within the City limits that met all of the search criteria.

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3.	The LAFCo will comment upon, whenever feasible, Notices of Preparation for Environmental Impact Reports or projects which involve the development of large tracts of open space and agricultural land and that are not scheduled for urbanization within a five-year period. Potential adverse impacts related to the loss of open space or agricultural land also will be commented upon by LAFCo.	This policy is not applicable to the request as LAFCo is a lead agency to the Project.
F. Application of the California Environmental Quality Act to Changes of Organization or Reorganization and Spheres of Influence		The City is requesting that LAFCo enter into a Memorandum of Understanding (MOU) to prepare the CEQA document. Under the draft MOU, the City would prepare the document with review by LAFCo. LAFCo would serve as the Lead Agency for the Sphere of Influence Amendment and the City would serve as the Lead Agency for the General Plan Amendment, rezoning, Project entitlement, and annexation.
G. Efficient Services and Orderly Development The LAFCo has determined that community needs for efficient services and orderly development are generally met most effectively by proposals which:		
1.	Correct a threat to the public health and safety	There are no threats to public health and safety.
2.	Consolidate the activities of public agencies in order to obtain economies from the provision of consolidated services	The proposed Project is supported by Cosumnes Community Services District and does not duplicate services.
3.	Consolidate services and service providers if such consolidations enhance the efficiency and quality of service (see I.5.a below); and	The proposed Project is supported by Cosumnes Community Services District and does not duplicate services.
4.	Restructure agency boundaries and service areas to provide more logical, effective, and efficient local government services.	This is not an application for restructuring of boundaries or services.
H. Need for Services The LAFCo will determine that a need for service exists if either of the following situations is present:		
1.	The growth rate and density pattern indicate that the subject area will be developed for urban use within five years; or	The City plans to begin construction of the Project in 2016.
2.	The subject territory has been pre-zoned, is designated for urban uses in the appropriate land use authority's General Plan and development at the site is not inconsistent with the policies of the General Plan.	The Project site will be the subject of a General Plan Amendment and rezoning after approval of the Sphere of Influence Amendment.
I. Standards for Annexation to and the Detachment from All Agencies		This is an application for a Sphere of Influence Amendment; therefore, these policies are not applicable.

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J. Determination of Costs		This is an application for a Sphere of Influence Amendment; therefore, these policies are not applicable.