

## 2 RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft SEIR, which concluded on March 29, 2021. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft SEIR.

### 2.1 LIST OF COMMENTERS ON THE DRAFT SEIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

**Table 2-1 List of Commenters**

Letter No.	Commenter	Date
AGENCIES		
A1	California Department of Transportation (Caltrans) Doug Adams, Associate Transportation Planner	February 16, 2021
A2	Sacramento Regional County Sanitation District (Regional San) Robb Armstrong, Principal Engineering Technician	February 17, 2021
A3	Sacramento Municipal Utility District (SMUD) Amy Spitzer, Environmental Services Specialist	March 23, 2021
A4	Sacramento Metropolitan Air Quality Management District (SMAQMD) Joseph J. Hurley, Associate Air Quality Planner/Analyst	March 29, 2021
ORGANIZATIONS		
O1	The Pacific Companies, Mike Kelley	March 1, 2021

### 2.2 COMMENTS AND RESPONSES

The written individual comments received on the Draft SEIR and the responses to those comments are provided below. The comment letters are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

## 2.2.1 Agencies

**Letter  
A1**

**From:** [Christopher Jordan](#)  
**To:** [Cori Resha](#)  
**Cc:** [Pat Angell](#)  
**Subject:** FW: Caltrans No Comment: Public Draft Housing Element Available for Review  
**Date:** Tuesday, February 16, 2021 1:43:32 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)

FYI

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**From:** Adams, Douglas@DOT <Douglas.Adams@dot.ca.gov>  
**Sent:** Tuesday, February 16, 2021 1:40 PM  
**To:** Christopher Jordan <cjordan@elkgrovecity.org>  
**Subject:** Caltrans No Comment: Public Draft Housing Element Available for Review

[EXTERNAL EMAIL]

Hello Christopher,

I wanted to let you know that Caltrans will have no comment on the Public Draft of the Housing Element.

┌ A1-1

Thank you,

Doug Adams  
 Associate Transportation Planner  
 Planning, Local Assistance, and Sustainability  
 California Department of Transportation, District 3  
 703 B Street | Marysville CA 95901  
 Phone: (530) 741-4543  
 Email: [douglas.adams@dot.ca.gov](mailto:douglas.adams@dot.ca.gov)  
[www.dot.ca.gov/d3/](http://www.dot.ca.gov/d3/)

**For real-time highway conditions:** <http://quickmap.dot.ca.gov/>




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**From:** City of Elk Grove <[strategicplanning@elkgrovecity.org](mailto:strategicplanning@elkgrovecity.org)>  
**Sent:** Friday, February 12, 2021 9:31 AM  
**To:** Fong, Alexander Y@DOT <[alexander.fong@dot.ca.gov](mailto:alexander.fong@dot.ca.gov)>  
**Subject:** Public Draft Housing Element Available for Review

**EXTERNAL EMAIL.** Links/attachments may not be safe.

**Letter A1 California Department of Transportation (Caltrans)**

Doug Adams, Associate Transportation Planner

February 16, 2021

A1-1

The comment states that Caltrans has no comment on the Draft SEIR.

This comment is noted.

**From:** [Christopher Jordan](#)  
**To:** [Cori Resha](#)  
**Cc:** [Pat Angell](#)  
**Subject:** FW: Elk Grove Housing Element and Safety Element Update\_DSEIR\_Notice of Availability  
**Date:** Wednesday, February 17, 2021 1:30:34 PM  
**Attachments:** [City of Elk Grove Housing Element and Safety Element Update\\_NOA\\_DSEIR\\_Final\\_20210217.pdf](#)

Letter  
A2

FYI

**From:** Armstrong, Robert <armstrongro@sacsewer.com>  
**Sent:** Wednesday, February 17, 2021 1:18 PM  
**To:** Christopher Jordan <cjordan@elkgrovecity.org>  
**Cc:** Sandy Kyles <skyles@elkgrovecity.org>  
**Subject:** Elk Grove Housing Element and Safety Element Update\_DSEIR\_Notice of Availability

[EXTERNAL EMAIL]

Good Afternoon Christopher,

Please find the attached response letter from Regional San pertaining to the above-mentioned project.

Feel free to contact me with any additional questions or concerns.

-Robb

A2-1

**Robb Armstrong**  
*Principal Engineering Technician*

Regional San – Development Services & Plan Check  
 10060 Goethe Road  
 Sacramento, CA 95827  
 Phone: (916) 876-6104  
 Email: [armstrongro@sacsewer.com](mailto:armstrongro@sacsewer.com)  
[www.regionalsan.com](http://www.regionalsan.com)



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February 17, 2021

Mr. Christopher Jordan  
 City of Elk Grove – Development Services Department  
 8401 Laguna Palms Way  
 Elk Grove, CA 95758

**Subject: Notice of Availability of a Draft Supplemental Environmental Impact Report for the City of Elk Grove Housing Element and Safety Element Update**

Dear Mr. Jordan,

Sacramento Regional County Sanitation District (Regional San) has the following comments pertaining to the Notice of Availability of the Draft Supplemental Environmental Impact Report for the City of Elk Grove’s (City) Housing Element and Safety Element Update.

The Housing Element Update addresses any changes that have occurred since adoption of the City’s current (2013-2021) Housing Element as well as amending the City’s General Plan land use designations and rezone sites within the City to accommodate the changes specified in the Housing Element Update.

Local sanitary sewer service for the proposed project will be provided by the Sacramento Area Sewer District’s (SASD) local sewer collection system. Ultimate conveyance of wastewater from the SASD collection system to the Sacramento Regional Wastewater Treatment Plant (SRWTP) for treatment and disposal will be provided by the Regional San Interceptor system.

A2-2

Customers receiving service from Regional San and SASD are responsible for rates and fees outlined within the latest Regional San and SASD ordinances. Fees for connecting to the sewer system are set up to recover the capital investment of sewer treatment facilities that provides service to new customers. The SASD ordinance is located on the SASD website at <https://www.sacsewer.com/sewer-ordinance> and the Regional San ordinance is located on the Regional San website at <https://www.regionalsan.com/ordinance>.

In February 2013, the Regional San Board of Directors adopted the Interceptor Sequencing Study (ISS). The ISS updated the Regional San Master Plan 2000. The ISS is located on the Regional San website at [www.regionalsan.com/ISS](http://www.regionalsan.com/ISS).

A2-3

In January 2012, the SASD Board of Directors approved the most current SASD planning document, the 2010 System Capacity Plan Update (SCP). The SCP is located on the SASD website at [www.sacsewer.com/devres-standards.html](http://www.sacsewer.com/devres-standards.html).

Mr. Christopher Jordan  
February 17, 2021  
Page 2

Regional San and SASD are not land-use authorities. Projects identified within Regional San and SASD planning documents are based on growth projections provided by land-use authorities. Sewer studies may need to be completed to assess the impacts of any proposed project that has the potential to increase flow demands.

A2-4

If you have any questions regarding this letter, please feel free to contact me at (916) 876-6104 or by email: [armstrongro@sacsewer.com](mailto:armstrongro@sacsewer.com).

Sincerely,

*Robb Armstrong*

Robb Armstrong  
Regional San Development Services & Plan Check

cc: SASD Development Services

**Letter A2 Sacramento Regional County Sanitation District (Regional San)**

Robb Armstrong, Principal Engineering Technician

February 17, 2021

- A2-1 The comment states that comments from the Sacramento Regional County Sanitation District (Regional San) are attached.
- This comment is noted. Response to these comments are provided in Responses to Comments A2-2 through A2-4.
- A2-2 The comment summarizes the Project and outlines the requirements for new connections.
- This comment is noted. Draft SEIR page 3.14-3 describes the Region San Master Plan (also referred to as the SRWTP Master Plan) and the Regional Interceptor Master Plan.
- A2-3 The comment discusses relevant documents, including the Regional San Master Plan 2000 and the 2010 System Capacity Plan Update.
- The reader is referred to Response to Comment A2-2.
- A2-4 The comment states that sewer studies may need to be completed to assess the impacts of any proposed project that has the potential to increase flow.
- An analysis of potential increases in wastewater flows from implementation of the Project are addressed in Draft SEIR Impact 3.14-2 on Draft SEIR page 3.14-20. As the City receives applications for housing development, project details will be sent to Regional San for review.

Powering forward. Together

Letter  
A3



**Sent Via E-Mail**

March 23, 2021

Christopher Jordan  
Director of Strategic Planning and Innovation  
8401 Laguna Palms Way  
Elk Grove, CA 95758  
[cjordan@elkgrovecity.org](mailto:cjordan@elkgrovecity.org)

Subject: **2021-2029 Housing Element and Safety Element Update / EIR / 2020069032**

Dear Mr. Jordan:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Environmental Impact Report (EIR) for the 2021-2029 Housing Element and Safety Element Update Project (Project, SCH 2020069032). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

A3-1

We have no comments to offer at this time but would appreciate if the City of Elk Grove would continue to keep SMUD facilities in mind as environmental review of the Project moves forward. Please reroute the Project analysis for SMUD's review if there are any changes to the scope of the Project.

If you have any questions regarding this letter, please do not hesitate to contact me at 916.732.5384, or by email at [Amy.Spitzer@smud.org](mailto:Amy.Spitzer@smud.org).

Sincerely,

Amy Spitzer  
Environmental Services Specialist  
Sacramento Municipal Utility District  
6201 S Street  
Sacramento, CA 95817

cc: Entitlements



**Letter A3 Sacramento Municipal Utility District (SMUD)**

Amy Spitzer, Environmental Services Specialist

March 23, 2021

A3-1

The comment states that SMUD has no comments to offer at this time but requests that the City send project-specific details for review when development projects are proposed pursuant to the Project.

The comment is noted. As the City receives applications for housing development, project details will be sent to SMUD for review.

Letter  
A4



March 29, 2021

Mr. Christopher Jordan  
 City of Elk Grove  
 Office of Strategic Planning and Innovation  
 8401 Laguna Palms Way  
 Elk Grove, CA 95758  
[cjordan@elkgrovecity.org](mailto:cjordan@elkgrovecity.org)

**Subject: Draft Subsequent Environmental Impact Report for the City of Elk Grove Housing Element and Safety Element-State Clearinghouse No. 2020069032**

Dear Mr. Jordan:

Thank you for providing an opportunity for the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) to review the Draft Subsequent Environmental Impact Report (DSEIR) for the City of Elk Grove 2021 Housing Element Update (HEU). As described in the SDEIR, the purpose of the 2021 Housing Element Update is to establish parameters for future residential development and provide opportunities for purposeful expansion that are aligned with community desires, as well as regional growth objectives and State law. Sac Metro Air District staff (District staff) comments on the HEU and SDEIR follow.

A4-1

**1. Locating Sensitive Receptors Near Sources of Air Toxics:**

District staff notes the implementation of General Plan Policies NR-2-4, NR-4-9, NR-4-10, MOB-3-1, MOB-3-2, MOB-3-5, MOB-3-6, MOB-3-7, MOB-3-13, and MOB-7-5 would lower exposure of sensitive receptors to sources of toxic air contaminants (TACs) throughout the General Plan Planning Area. District staff commends the City for the inclusion of these measures.

A4-2

Additionally, District staff recommends the HEU include requirements to provide vegetative barriers between new housing and major roadways to reduce TAC exposure. More information and best practices are described in the Sac Metro Air District's *Landscaping Guidance for Improving Air Quality near Roadways*<sup>1</sup> for installing vegetative barriers between major roadways and sensitive receptors.

**2. Energy Conservation:**

District staff notes the discussion of opportunities for Energy Conservation in Chapter 9. In addition to the policies listed in the Elk Grove Climate Action Plan and General Plan, District staff recommends expanding this section to encourage electrification of HVAC, water heating, and kitchen equipment, which can conserve energy, reduce greenhouse gas (GHG) emissions, and improve indoor air quality.<sup>2</sup>

A4-3

<sup>1</sup> [Landscaping Guidance for Improving Air Quality near Roadways](#), Sacramento Metropolitan Air Quality Management District, April 2017

<sup>2</sup> Gas Stoves: Health and Air Quality Impacts and Solutions; Brady Seals & Andee Krasner, Rocky Mountain Institute, 2020 <https://rmi.org/insight/gas-stoves-pollution-health/>

Along with the City of Elk Grove, the Sac Metro Air District participated in the Capital Region Transportation Sector Urban Heat Island Mitigation Project (UHI Project)<sup>3</sup>, producing a report on urban heat island effect impacts on the Sacramento region, and mitigation strategies for these impacts. The urban heat island already presents a serious challenge for our region. Urbanized areas are 3 to 9 degrees Fahrenheit warmer than surrounding areas, which results in decreased air quality and associated public health impacts along with increased energy usage. Chapter 9 could also include policies to reduce the urban heat island effects in Elk Grove and the region by encouraging cool roofs<sup>4</sup> and high albedo pavements<sup>5</sup>, which would further reduce the energy needed to heat and cool homes.

A4-4

### 3. Transit-Oriented Development:

The HEU DSEIR references General Plan policies that are supportive of transit-oriented development, which is critical to reducing vehicle miles traveled and meeting climate change and air quality goals. As described in Section 3.13 Transportation, on page 3.13-5; policies MOB-4-4, MOB-5-1, MOB-5-4, and MOB-5-6 will support and encourage transit-oriented development<sup>6</sup>.

A4-5

Thank you for your consideration of these comments. If you have any questions, please contact me at 916-874-2694 or [jhurley@airquality.org](mailto:jhurley@airquality.org).

Regards,

-JJ Hurley

Joseph J. Hurley  
Associate Air Quality Planner/Analyst

cc: Paul Phillely, AICP, CEQA & Land Use Program Supervisor

<sup>3</sup> Capital Region Urban Heat Island Mitigation Project website: <https://urbanheat-smaqmd.hub.arcgis.com/>

<sup>4</sup> [The California Energy Commission's Title 24, Part 6](#), suggests an aged solar reflectance of at least 0.63 for low-sloped roofs and at least 0.20 for steep-sloped roofs, and minimum thermal emittance of 0.75. The Cool Roof Rating Council provides [a product directory of roofs](#).

<sup>5</sup> <http://www.airquality.org/LandUseTransportation/Documents/SMAQMDRecommendedCoolPavementStrategies.pdf>

<sup>6</sup> HUE DSEIR Section 3.13 Transportation; page 3.13-5;

**Policy MOB-4-1:** Ensure that community and area plans, specific plans, and development projects promote context-sensitive pedestrian and bicycle movement via direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area. This may include convenient pedestrian and bicycle connections to public transportation.

**Policy MOB-5-1:** Support a pattern of land uses and development projects that are conducive to the provision of a robust transit service. Consider amendments to the land use plan, as appropriate, that increase the density and intensity of development along the City's fixed transit alignment and other major transit corridors.

**Policy MOB-5-4:** Support mixed-use and high-density development applications close to existing and planned transit stops.

**Policy MOB-5-6:** The City shall work to incorporate transit facilities into new private development and City project designs including incorporation of transit infrastructure (e.g. electricity and fiber-optic cable), alignments for transit route extensions, new station locations, bus stops, and transit patron waiting area amenities (e.g. benches and real-time traveler information screens).

## Letter A4 Sacramento Metropolitan Air Quality Management District (SMAQMD)

Joseph J. Hurley, Associate Air Quality Planner/Analyst

March 29, 2021

- A4-1 The comment is an introductory remark summarizing the Project.  
The comment is noted.
- A4-2 The comment states that implementation of General Plan Policies would lower exposure of sensitive receptors to sources of toxic air contaminants (TACs) and recommends that the Housing Element Update include requirements to provide vegetative barriers between new housing and major roadways to reduce TAC exposure.  
  
As identified under Draft SEIR Impact 3.2-4, implementation of the Project would not result in a new TAC impact or a substantially more severe TAC impact than was addressed in the General Plan EIR (Draft SEIR pages 3.2-21 and 3.2-22). Implementation of General Plan policies NR-4-9, NR-4-10, and Standard NR-4-10a on applicable subsequent projects would include the consideration of buffering to address pollutant exposure and would include consideration of vegetative barriers as identified in the Sacramento Metropolitan Air Quality Management District's *Landscaping Guidance for Improving Air Quality near Roadways*.
- A4-3 The comment notes the discussion of opportunities for Energy Conservation in Chapter 9 and recommends expanding this section to encourage electrification of HVAC, water heating, and kitchen equipment, which can conserve energy, reduce greenhouse gas (GHG) emissions, and improve indoor air quality.  
  
The comment is noted. The Project consists of the update of the General Plan Housing Element and Safety Element and does not propose updates to the City's Climate Action Plan. As identified in Draft SEIR Impacts 3.5-1, 3.5-2, and 3.7-1, implementation of the Project would not result in new energy or greenhouse impacts or substantially more severe impacts than was addressed in the General Plan EIR (Draft SEIR pages 3.5-8 through 3.5-11 and 3.7-10 through 3.7-11).
- A4-4 The comment discusses participation in the Capital Region Transportation Sector Urban Heat Island Mitigation Project (UHI Project) and states that Chapter 9 could also include policies to reduce the urban heat island effects in Elk Grove and the region by encouraging cool roofs and high albedo pavements, which would further reduce the energy needed to heat and cool homes.  
  
The comment is noted and will be forwarded to the Planning Commission and City Council for consideration. No comments on the adequacy of the Draft SEIR were provided so no further response is provided.
- A4-5 The comment notes that General Plan Policies described in Section 3.13 will support and encourage transit-oriented development.  
  
The comment is noted and will be forwarded to the Planning Commission and City Council for consideration.

## 2.2.2 Organizations

Letter  
01

**From:** [Christopher Jordan](#)  
**To:** [Cori Resha](#); [Pat Angell](#)  
**Subject:** FW: Laguna Bruceville Property  
**Date:** Monday, March 1, 2021 2:59:29 PM

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FYI... for site C-3.

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**From:** Mike Kelley <mikek@tpchousing.com>  
**Sent:** Monday, March 1, 2021 2:56 PM  
**To:** Christopher Jordan <cjordan@elkgrovecity.org>; Sarah Kirchgessner <skirchgessner@elkgrovecity.org>  
**Subject:** RE: Laguna Bruceville Property

[EXTERNAL EMAIL]

Hi Christopher,

Just a note to let you know RD 40 (min 30.1 du/acre – 40 du/acre) works for the program we are pursuing. We are much more familiar with the site today than when we last communicated.

Please let me know if you have questions or require any additional information.

Best regards,  
Mike

01-1

## Letter O1 The Pacific Companies

Mike Kelley

March 1, 2021

O1-1 The comment requests that housing site C-3 be changed to reflect RD-40 zoning.

Based on this comment, the City proposes the text changes shown below to reflect proposed RD-40 zoning on site C-3. While this zoning change would increase the potential number of net new dwelling units beyond what was evaluated in the General Plan EIR, this would not change the overall development footprint anticipated in the General Plan EIR. Thus, the additional units would not change the analyses or conclusions for impacts based on the development footprint. The air quality, greenhouse gas (GHG) emissions, energy, and noise impact analysis and modeling used the RHNA allocation for the very low, low, and moderate income levels (5,451 units) rather than net new units (i.e., beyond what was considered in the General Plan EIR) presented in the Draft SEIR (2,722 units). Because those analyses assumed up to 5,451 new residential units, the addition of 23 additional units to the net new number of units beyond what was evaluated in the General Plan EIR would still be lower than the amount assumed by these analyses. Therefore, the addition of units in response to this comment would not change the information presented in those analyses or their conclusions. For vehicle miles traveled (VMT) analysis, the increase of additional units within a site already evaluated would have the potential to decrease overall VMT by increasing the housing density. For other issues related to public services and utilities that are based on unit count or number of residents, text changes below reflect the slight increases. This information does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

Text deletions are shown in ~~striethrough~~, and text additions are shown in underline. The following edits are made to the Draft SEIR. These edits are minor and do not constitute "significant new information" that would require recirculation of the Draft EIR under State CEQA Guidelines Section 15088.5.

Table 2-2 beginning on page 2-14 is revised as follows:

**Table 2-2 Existing Sites and Candidate Sites for Very Low and Low Income Groups**

Map ID	General Location	Acreage	Existing General Plan Designation	Existing Zoning	Proposed General Plan Designation	Proposed Rezoning	Dwelling Units
E-1	M&H Site in Lent Ranch	12.8	HDR	RD-20	HDR	RD-20	230
E-2	Quail Run	4.88	HDR	RD-25	HDR	RD-25	102
E-3	Southeast corner of Bruceville Road and Poppy Ridge Road	15.48	HDR	RD-20	HDR	RD-30	418
E-4	Northwest corner of Bruceville Road and Big Horn Boulevard	6.5	HDR	RD-25	HDR	RD-30	178
E-5	SEPA, Clark Property, Poppy Ridge at Lotz Parkway	9	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (25-30)	243
E-6	SEPA, Suyanaga Property, Southeast corner of Poppy Ridge and Big Horn	8.6	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (25-30)	233

Map ID	General Location	Acreage	Existing General Plan Designation	Existing Zoning	Proposed General Plan Designation	Proposed Rezoning	Dwelling Units
E-7	SEPA, Souza Lot 1096	7.1	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	192
E-8	SEPA, Souza Lot 1097	7.9	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	198
E-9	SEPA, Souza Lot 1098	6.5	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	163
E-10	SEPA, Souza Lot 1098	7.2	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	180
E-11	SEPA, Souza Lot 1105	9.3	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	233
E-12	SEPA, Bruceville Meadows	8.4	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (25-30)	227
E-13	Laguna Ridge, Backer Property, Southwest corner of Big Horn and Poppy Ridge	11.1	HDR	RD-25	HDR	<del>RD-25</del> <u>RD-30</u>	300
E-14	Elk Grove Florin Road at Brown Road	4.4	HDR	RD-25	HDR	RD-30	119
E-15	Harbour Point Drive and Maritime Drive	3.06	HDR	RD-25	HDR	RD-30	83
E-16	East Stockton Boulevard at Bow Street	2.9	HDR	RD-25	HDR	RD-30	78
E-17	Sheldon Farms North, Stein	5.3	HDR	RD-25	HDR	RD-30	143
E-18	Sheldon Farms South, Arsone	9	HDR	RD-25	HDR	<del>RD-25</del> <u>RD-30</u>	243
C-1	Sterling Meadows HDR Site (southeast corner of Lotz Parkway and Bilby Road)	10.68	HDR	RD-20	HDR	RD-30	289
C-2	End of Dunisch Road	2.87	RC	SC	HDR	RD-25	72
C-3	Laguna Boulevard and Bruceville Road (COBRA/Pacific Properties)	7.6	MDR	RD-15	HDR	<del>RD-30</del> <u>RD-40</u>	<del>205</del> <u>228</u>
C-4	2804 Elk Grove Boulevard (Samos)	7.49	MDR	RD-15	HDR	RD-30	202
C-5	Southeast corner Sheldon Road and East Stockton Boulevard	12.3	RC	SC	HDR	RD-30	332
C-6	Northeast corner Sheldon Road and Power Inn Road	8	CC	GC	HDR	RD-30	216
C-7	Waterman Road at Rancho Drive	3.5	LDR	RD-4	HDR	RD-25	88

Map ID	General Location	Acreage	Existing General Plan Designation	Existing Zoning	Proposed General Plan Designation	Proposed Rezoning	Dwelling Units
C-8	8994 Calvine Road	2.32	RC	RD-5	HDR	RD-25	58
C-9	8770 Calvine Road	3.5	HDR	RD-20	HDR	RD-25	88
C-10	Laguna Boulevard and Haussmann Street	6.96	CC	LC	HDR	RD-30	198
C-11	Laguna Vaux	2.59	CC	LC	HDR	RD-30	70
C-12	Laguna Boulevard and Gropius Street	5.85	EC	MP	HDR	RD-30	158
C-13	9296 E Stockton Boulevard	3.81	HDR	RD-20	HDR	RD-30	103
C-14	9343 E Stockton Boulevard	1.96	EC	BP	HDR	RD-30	53
C-15	Northwest corner Bond Road and Waterman Road	4.6	CC	GC	HDR	RD-25	115
C-16	Stathos Property (Elk Grove Blvd, west of Carlton assisted care facility)	3.19	LDR	RD-5	HDR	RD-30	86
C-17	Waterman 75 (Mosher Road and Grant Line Road)	5	RC	RD-10	HDR	RD-30	135
C-18	Bow Street Northwest	10.3	LDR	RD-6	HDR	RD-30	258
C-19	Old Town, southwest corner of Elk Grove Boulevard and Webb Street	1.87	CC	OTSPA	HDR	RD-25	53
C-20	Southeast corner Bond Road and Waterman Road	1.5	RR	AR-2	HDR	RD-25	38
C-21	Bond Road and Stonebrook Drive	1.66	MDR	RD-15	HDR	RD-25	42
C-22	Calvine Road and Jordan Ranch Road	2.06	ER	RD-4	HDR	RD-25	52
C-23	Calvine Road and Bradshaw Road	2.02	CC	GC/AR-5	HDR	RD-25	21
C-24	Southwest corner Lotz Parkway and Whitelock Parkway	5	LDR	RD-5	HDR	RD-25	125
C-25	Bradshaw, just south of Calvine, behind/adjoining Eden Gardens Event Center	5.17	ER	AR-5	HDR	RD-25	129
Total		261.5 acres					<del>6,749</del> <u>6,772</u>



The paragraph beginning at the bottom of page 2-14 is revised as follows:

As shown in Table 2-2, the proposed Housing Element Update would accommodate up to ~~6,749~~ 6,772 units for the RHNA very low and low income groups, which exceeds the City's requirement of providing 4,265 units for these income groups.

The first paragraph on page 2-15 of the Draft SEIR is revised as follows:

Table 2-3 below identifies the potential number of units under the adopted General Plan and the maximum number of units under the proposed Housing Element Update. As shown in Table 2-3, the adopted General Plan and current zoning anticipates 4,027 units on the existing and candidate housing sites. Under the proposed Housing Element Update, up to an additional ~~2,722~~ 2,745 units would be provided based upon the assumed average density. The proposed rezoning of candidate housing sites C-2, C-5, C-6, C-10, C-11, C-12, C-14, C-15, C-17, C-19, and C-23 would result in the loss of planned nonresidential uses and approximately 1,419 jobs under buildout of the General Plan.

Table 2-3 beginning on page 2-15 is revised as follows:

**Table 2-3 Existing and Proposed Development Potential under the General Plan**

Map ID	Potential Dwelling Units Adopted General Plan Land Use Designations	Potential Dwelling Units Housing Element Update	Development Potential Change From Adopted General Plan
E-1	230	230	0
E-2	102	102	0
E-3	310	418	108
E-4	163	178	15
E-5	225	243	18
E-6	215	233	18
E-7	178	192	14
E-8	198	198	0
E-9	163	163	0
E-10	180	180	0
E-11	233	233	0
E-12	210	227	17
E-13	300	300	0
E-14	110	119	9
E-15	77	83	6
E-16	73	78	5
E-17	133	143	10
E-18	225	243	18
C-1	192	289	97
C-2	0	72	72
C-3	91	<del>205</del> <u>228</u>	<del>114</del> <u>137</u>
C-4	90	202	112
C-5	0	332	332
C-6	0	216	216
C-7	14	88	74

Map ID	Potential Dwelling Units Adopted General Plan Land Use Designations	Potential Dwelling Units Housing Element Update	Development Potential Change From Adopted General Plan
C-8	12	58	46
C-9	63	88	25
C-10	0	198	198
C-11	0	70	70
C-12	0	158	158
C-13	67	103	36
C-14	0	53	53
C-15	0	115	115
C-16	16	86	70
C-17	40	135	95
C-18	62	258	196
C-19	0	53	53
C-20	1	38	37
C-21	20	42	22
C-22	8	52	44
C-23	0	21	21
C-24	25	125	100
C-25	1	129	128
Total	4,027	<del>6,749</del> <u>6,772</u>	<del>2,722</del> <u>2,745</u>

The first paragraph on page 3.5-9 is revised as follows:

For instance, parcels C-1, Sterling Meadows High-Density Residential Site, C-3, Laguna Boulevard and Bruceville Road, and C-4, 2804 Elk Grove Boulevard (among several others) are proposed to be rezoned to RD-30 or RD-40 to provided additional higher-density, affordable housing to meet the City's housing needs (see Table 2-2 in Chapter 2, "Project Description."

The paragraph under Impact 3.8-2 on page 3.8-12 is revised as follows:

General Plan EIR Impact 5.8.3 evaluated the potential for hazardous emissions within one-quarter mile of existing or proposed schools. The analysis noted that there are several elementary schools, middle schools, and high schools as well as several private schools, preschools, and childcare facilities within the City. The analysis concluded that while the General Plan could result in activities that would involve the use of hazardous materials within one-quarter mile of a school, adherence to existing regulations and General Plan policies would ensure that impacts would be less than significant. Eighteen potential housing sites (Sites C-3, C-4, C-5, C-6, C-8, C-9, C-10, C-13, C-14, C-16, C-21, C-22, C-23, C-25, E-2, E-4, E-15, and E-18) are located within one-quarter mile of an existing or proposed school. Implementation of the Project could result in a net increase in the number of residential units in the City over what is planned for under the General Plan by up to ~~2,722~~ 2,745 net new residential units depending on the final selection of housing sites for the Housing Element Update. Residential land uses do not typically involve the storage or usage of substantial quantities of hazardous materials, and thus, Project implementation would not result in a substantial increase of hazardous materials located near schools.

Impact 3.10-1 on page 3.10-14 is revised as follows:

### **Impact 3.10-1: Induce Substantial Population Growth**

The Housing Element Update would accommodate up to ~~2,722~~ 2,745 net new dwelling units, which would accommodate approximately ~~8,765~~ 8,839 people (based on 3.22 persons per household). This growth would be within the projections generally assumed under the City's General Plan and regional planning efforts completed by SACOG. This impact would be less than significant.

Table 2-2 and Figure 2-2 in Chapter 2, "Project Description," indicate the location and size of existing and candidate sites. While no specific development projects are proposed at this time, subsequent multi-family development on any or all of the existing and candidate sites would be not considered additional population or housing growth above that projected in the General Plan and analyzed in the General Plan EIR. The Housing Element Update does not require new construction or expansion of existing roadway infrastructure (e.g., new roads); however, infrastructure improvements to provide utilities to the existing and candidate sites would be necessary. Necessary infrastructure improvements would be limited to those necessary to serve projects associated with the Housing Element Update and would not be sized to accommodate additional population growth beyond the growth disclosed herein.

The Housing Element Update would accommodate up to ~~2,722~~ 2,745 net new dwelling units, which would accommodate approximately ~~8,765~~ 8,839 people (based on 3.22 persons per household). Above the existing conditions, the Housing Element Update would result in a potential total of ~~58,357~~ 58,380 dwelling units and a population level of ~~184,552~~ 184,626. The General Plan projects that at buildout (in 30 years or more), the City and its study areas would accommodate 332,254 people within 102,865 dwelling units. In addition, SACOG's 2036 projections for Elk Grove estimate that the City will have a population of 201,197 people accommodating 65,367 dwelling units (City of Elk Grove 2018:3.0-2, SACOG 2012). The population increase and development potential associated with the Housing Element Update and SACOG projections would be included within the relevant estimates and thus generally consistent with City and regional growth assumptions.

The first full paragraph on page 3.10-15 is revised as follows:

Elk Grove's total RHNA for the 2021–2029 planning period is 8,263 units, allocated to specific income groups. The City currently has an adequate number of zoned residential sites to meet RHNA requirements for the moderate and above moderate income groups. It has identified 43 possible housing sites (18 existing sites and 25 new candidate sites) located within City limits that could accommodate housing to meet the RHNA very low and low income levels. The 25 candidate sites, sites C-1 through C-25, would require rezoning, which covers 122.03 acres. Implementation of the Housing Element Update could accommodate up to ~~2,722~~ 2,745 units over the adopted General Plan land use designations. All 43 of the proposed housing sites are designated for urban or residential uses in the adopted General Plan; none of the existing and candidate sites are designated for conservation or preservation uses.

The first full paragraph below the summary of Impact 3.12-2 on page 3.12-8 is revised as follows:

Implementation of the Housing Element Update would increase housing and density in the City. The Housing Element Update would accommodate up to ~~2,722~~ 2,745 additional dwelling units beyond the number anticipated in the original General Plan EIR. The additional units would accommodate approximately ~~8,773~~ 8,839 people (based on 3.223 persons per household). To maintain EGPD's current officer-to-resident population ratio of 0.81 sworn police officers per 1,000 residents, approximately eight new officers and/or administrative staff may be needed to

serve the City. The EGPD operates out of a centralized facility at the City Hall complex and additional police services to accommodate development can be accomplished through additional personnel and equipment. The main police service campus is growing to accommodate the need for more police department office and storage space.

The first full paragraph below the summary of Impact 3.12-3 on page 3.12-9 is revised as follows:

As stated previously, implementation of the Housing Element Update would result in additional housing in the City. Overall, the Housing Element Update could increase the number of dwelling units in the City up to ~~2,722~~ 2,745 units beyond those identified in the General Plan. This increase of ~~2,722~~ 2,745 net new housing units would result in a potential population increase in the City of up to ~~8,773~~ 8,839 persons when compared to the adopted General Plan. Implementation of the Safety Element Update would update current policies but would not increase development that would generate new students. Therefore, the Safety Element Update would not result in effects related to the increased demand for public school facilities.

Table 3.12-1 on page 3.12-9 is revised as follows:

**Table 3.12-1 Potential New Students**

Grade Level	Multi-Family Units	Maximum Potential of Additional Units Beyond General Plan Buildout	New Students
Elementary K-6	0.2108	<del>2,722</del> <u>2,745</u>	<del>574</del> <u>579</u>
Middle School 7-8	0.0541		<del>147</del> <u>149</u>
High School 9-12	0.1270		<del>346</del> <u>349</u>
Total		<del>2,722</del> <u>2,745</u>	<del>1,067</del> <u>1,077</u>

The first paragraph following Table 3.12-1 on page 3.12-9 is revised as follows:

Based on the existing student generation factors, the Housing Element Update could result in an additional ~~1,144~~ 1,077 students to be enrolled at EGUSD schools.

The first paragraph below the summary of Impact 3.12-4 on page 3.12-10 is revised as follows:

Implementation of the Housing Element Update would in additional housing beyond what is currently allowed under the General Plan. This could result in an additional ~~2,722~~ 2,745 dwelling units and a net increase of ~~8,773~~ 8,839 in City population beyond what is currently anticipated at buildout under the General Plan. CCSD parkland standards, City Municipal Code Chapter 22.40 and General Plan Policy PT-1-3 require a minimum of 5 acres of developed parkland per 1,000 residents; the Laguna Ridge Specific Plan calls for parkland at a rate of 7 acres per 1,000 residents. The City has also established requirements for bicycle, pedestrian, and trail facilities as part of new development, either through the City’s Bicycle, Pedestrian, and Trails Master Plan, or through the requirements of an area plan, such as LRSP or SEPA; though, these facilities are in addition to the required park facilities. The City requires that private developers proposing residential projects in the City either dedicate land for park facilities or pay a fee in lieu of providing parkland. These dedications and fees are collected by the City or CCSD as part of the development process and used for the purpose of developing new park facilities to serve the development for which the fees were paid. The dedication of parkland and the payment of fees in lieu of dedication were identified in Impact 5.11.4.1 of the General Plan EIR.

The first full paragraph under the summary for Impact 3.14-1 on page 3.14-16 is revised as follows:

Implementation of the Housing Element and Safety Element Update would not, in and of itself, construct new housing in the City. However, the Housing Element Update would facilitate the development of residential units by providing policies and actions that would promote housing

for all persons. The majority of policies and actions in the Housing Element Update commit the City to continuing to encourage the provisions of affordable housing and housing appropriate for special needs groups and to encourage the maintenance of existing housing. Implementation of the Housing Element Update could increase the number of dwelling units in the City by up to ~~2,722~~ 2,745 units over development anticipated in the adopted General Plan through redesignation of General Plan land uses and associated rezoning.

The first paragraph in page 3.14-17 is revised as follows:

Implementation of the Housing Element Update would increase the number of dwelling units in the City by up to ~~2,722~~ 2,745 units over development anticipated in the adopted General Plan through redesignation of General Plan land uses. Table 5.14-4 of the General Plan EIR shows the water demand factors for each General Plan land use designation and calculates the water demand for each land use based on acreage. Using the water demand factors for each existing and proposed land use, Table 3.14-5 below calculates the difference in water demand that would occur with implementation of the land use changes in the Housing Element Update. As calculated below, the Project could result in an increase in water demand of approximately 45.11 AFY. No increase in water demand is anticipated from implementation of the Safety Element Update because no changes in General Plan designated land uses would occur.

The second paragraph below the summary of Impact 3.14-3 on page 3.14-21 is revised as follows:

The Housing Element Update would result in up to ~~2,722~~ 2,745 additional residential units beyond the number assumed in the General Plan EIR, which could result in approximately ~~8,765~~ 8,839 additional residents (assuming 3.22 residents per dwelling unit). Using the solid waste disposal rate of 1.08 tons per resident per year (equivalent to 5.9 pounds per day), implementation of the Housing Element and Safety Element Update would generate approximately ~~9,466~~ 9,546 tons of waste per year. This represents an increase beyond those discussed in the General Plan EIR. However, this increase would reasonably be expected to remain below the statewide per capita target, because the current per capita disposal rate in 2015 was 2.8 pounds per capita per day, and this increase would not be substantial enough to increase the City-Wide per capita disposal rate above the State's goal of 5.9 pounds per capita per day. Implementation of the Safety Element Update would not result in land uses or activities that would generate solid waste service demands.

The second paragraph on page 6-3 is revised as follows:

As noted in Chapter 2, "Project Description," of this Draft SEIR, the Project would result in up to ~~2,722~~ 2,745 new dwelling units beyond what was evaluated in the General Plan EIR (City of Elk Grove 2018). While the Project would increase housing units, all Project parcels were already anticipated for various levels of development under the General Plan (City of Elk Grove 2019). While housing units would increase, the Project could result in a reduced level of commercial development as compared with that anticipated by the General Plan, the Project would not increase the City's development footprint. Implementation of the Housing Element and Safety Element Update could result in the irreversible and irretrievable commitment of material resources and energy during construction and operation of future development, including:

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