



**CITY OF ELK GROVE
CITY COUNCIL STAFF REPORT**

AGENDA TITLE: A Public Hearing to consider certification of an Environmental Impact Report and adoption of Findings of Fact and Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program; and adoption of the 2019 General Plan

MEETING DATE: February 27, 2019

PREPARED BY: Christopher Jordan, AICP, Director of Strategic Planning and Innovation

DEPARTMENT HEAD: Jason Behrmann, City Manager

RECOMMENDED ACTION:

Staff and the Planning Commission recommend that the City Council:

1. Adopt a Resolution certifying the General Plan Update Environmental Impact Report and adopt the Findings of Fact and Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program; and
2. Adopt a Resolution adopting the 2019 General Plan.

BACKGROUND INFORMATION:

The City of Elk Grove is conducting a comprehensive update of its General Plan. State law (Government Code Section 65300) requires each city and county to adopt a comprehensive, long-term general plan for its physical development. The General Plan and implementing programs serve as the blueprint for future growth and development. These documents contain policies and programs designed to provide decision makers with a solid basis for future decisions related to land use and development.

The City's current General Plan was adopted in November 2003 following incorporation of the City. Since its adoption, the City has grown and

changed and numerous developer and City-initiated amendments to the current General Plan have been adopted, including, but not limited to:

- Laguna West, annexed 2004
- Laguna Ridge Specific Plan, adopted 2004
- Safety Element, updated 2005 and 2015
- Housing Element, updated 2009 and 2014
- Sustainability Element and Climate Action Plan, adopted 2013
- Southeast Policy Area Community Plan, adopted 2014

Additionally, new laws affecting general plans have been passed, new social and environmental issues have emerged, and new planning strategies and practices have been developed. Therefore, beginning in 2015, the City engaged the community through a series of events and workshops, as well as a series of City Council/Planning Commission study sessions, to develop the General Plan Update (Project). Major events/activities of the Project have included the following:

- Creating a project website and email distribution list for residents to learn about the project and stay involved.
- A Joint Study Session of the City Council and Planning Commission on June 1, 2015, to set the stage for the Project, informing on aspects of the scope and approach. Key issues and opportunities for the General Plan were also established covering economic vitality; rural areas; regional goals and influences; infill development and outward expansion; neighborhood, district and community identity; multimodal and active transportation; sustainable and healthy community; coordinated services, technology and infrastructure; and open space and resource management.
- A one-day Citizen's Planning Academy – an educational workshop that introduced community members to the General Plan update and prepared community members for ongoing and productive participation in the process.
- Five mobile studios at community events between September and December 2015.
- Individual and group meetings with community members, community service providers, regional governmental agencies, and nonresident interest groups (including non-profit and business interests).

- A Community Visioning Workshop, which provided a forum for community members to come together to deliberate and provide input on the future of their community.
- Topic workshops on growth strategies and transportation in early 2016.
- Workshops with homeowner and community groups.
- An on-line workshop on potential areas of land use change.
- A series of in-person and on-line workshops to discuss specific land use alternatives for opportunity and study area sites.
- Eight joint City Council-Planning Commission study sessions to discuss key topics relative to the Project, including land use, mobility, governance, complete streets, fixed transit, clustering, jobs and housing, and an annexation strategy.

The draft General Plan was released on July 27, 2018, for public review and comment. Beginning in September 2018, the Planning Commission held a series of study sessions to review the draft General Plan (and accompanying Climate Action Plan and Transportation Analysis Guidelines).

Table 1 summarizes the General Plan Review Schedule.

Table 1: General Plan Review Schedule

Date	Activity
July 27, 2018	Release Public Draft Documents
August 16, 2018	Planning Commission overview presentation (no action was taken)
August 22, 2018	City Council overview presentation (no action was taken)
September 6, 2018	Planning Commission Workshop #1: Vision; Economy and the Region; Services, Health, and Safety
September 13, 2018	Public meeting to accept any public comments on the Draft Environmental Impact Report
September 20, 2018	Planning Commission Workshop #2: Community and Resource Protection; Climate Action Plan
September 26, 2018	EIR 60-day review closed
October 4, 2018	Planning Commission Workshop #3: Urban and Rural Development; Community and Area Plans
October 18, 2018	Planning Commission Workshop #4: Mobility/Transportation Analysis Guidelines

Date	Activity
December 6, 2018	Planning Commission Workshop #5: Follow-Up Meeting on Climate Action Plan Update
January 4, 2019	Release Final EIR
January 17, 2019	Planning Commission Public Hearing and recommendation to City Council
February 27, 2019	City Council hearing

PLANNING COMMISSION REVIEW:

As noted in Table 1, the Planning Commission has conducted five public workshops to review the draft General Plan, which were in addition to their participation in the Joint Study Sessions with the City Council during development of the General Plan.

On January 17, 2019, the Planning Commission conducted the public hearing for the draft General Plan Update. At the conclusion of the meeting, the Commission voted 4-0 (Maita absent) to recommend certification of the Environmental Impact Report (EIR) and adoption of the General Plan, including the revisions contained in Exhibit B to Attachment 2 (the General Plan Errata).

Major revisions made to the General Plan as a result of public comment or Planning Commission review are summarized later in this report.

ANALYSIS/DISCUSSION:

Overview of the General Plan

The General Plan Update has been informed by the following issues and considerations identified through the community engagement process, analysis of existing conditions, and the community vision.

- **Regional Role.** The Plan focuses on communicating the role Elk Grove plays in the larger Sacramento region and moving Elk Grove forward as a prominent player in the region. Within the larger regional context, Elk Grove is often considered a bedroom community, with a large number of residents who live in the community but work elsewhere. Through the General Plan, the City will continue to encourage nonresidential development to provide opportunities for local employment. Designating areas for employment centers to act as hubs for new jobs and spaces for innovation is a central component of the Plan.

- **Growth Management.** The Plan strikes a desirable balance between growth – and the requisite increase in jobs, development, and amenities – and preserving existing structures, resources, and community character. These items are not necessarily in direct competition but can become so if growth is not managed carefully and aligned with community desires and values. By establishing clear parameters for future development, the General Plan facilitates development on vacant or underutilized lots in the City, while also providing opportunities for purposeful expansion aligned with the Community Vision and regional growth objectives.
- **Economic Vitality.** The Plan supports balanced and diverse growth to increase the level of commercial and industrial activity in the City and improve opportunities for residents to work in the community and/or have improved accessibility to their place of employment. Economic development goals and policies focus on business retention and expansion, business attraction, and economic diversity by promoting advanced technologies such as fiber optic Internet and Citywide information services. The Plan also reaffirms the City’s ongoing commitment to the preservation of rural lands in Elk Grove’s eastern portion, providing an opportunity to showcase this aspect of Elk Grove’s heritage through agri-tourism. Additionally, the Plan encourages a variety of housing across income levels and lifestyles creating options for employers and employees to live close to work or in an area with increased accessibility to work.
- **Community Identity.** The Plan promotes a welcoming and thriving civic core, preservation of Old Town as a showcase for community heritage, and a continued focus on the integration of parks and schools as focal points in the community.
- **Rural and Agricultural Heritage.** The Plan ensures that the character of Elk Grove, based on a legacy of agriculture and a rural lifestyle, is preserved. Rural housing and infrastructure options continue to protect agricultural uses.
- **Parks, Trails, and Open Space.** The Plan maintains the attractiveness, cleanliness, high level of safety, and well-kept amenities that characterize the City’s local parks. Support for walking and biking connections locally and regionally increases access to, and enjoyment of, both active and passive open spaces including

enhanced access to natural resources such as the Cosumnes River Preserve.

- **Mobility.** The Plan recognizes the need to tailor mobility infrastructure to an area's surrounding context, particularly in the eastern, more rural portions of the City where the population density is lower. A complete street in a rural area will be different from one in an urban area. The Plan recognizes local, regional, and State transportation objectives, reflecting a need to shift goals and policies regarding how roadway operations are measured and analyzed. The Plan provides for a range of transportation choices, including transit as a clean, safe, and accessible mobility option.
- **Healthy Living.** The Plan addresses sustainability and healthy living options in Elk Grove by improving resiliency to a changing climate, encouraging green technologies, and promoting resource conservation.
- **Community Services.** The Plan considers the needs of all demographic segments of the community including youth, the elderly and disadvantaged families. The Plan encourages access to public services that provide assistance to community members and promotes gathering spaces throughout the community that meet basic needs and improve the quality of life.

State law mandates that general plans address eight topics (referred to as "elements"): land use, circulation, housing, conservation, open space, noise, safety, and environmental justice. The local agency may incorporate optional elements to address issues of local importance. All elements, whether mandatory or optional, have the same level of importance and legal weight, and the plan must be an integrated, internally consistent, and compatible statement of policies. State law also specifically provides that a general plan may be adopted in any format deemed appropriate or convenient by the legislative body. This flexibility in organization recognizes that each local agency should have discretion in determining a format that best fits its unique circumstances. The draft General Plan takes advantage of this flexibility to organize chapters around a series of key themes to better reflect local issues and context and minimize redundancies between the mandated elements. This approach allows the General Plan goals and policies to focus on implementation of the Plan's vision while still incorporating the requirements of the eight mandated elements.

Table 2 and Figure 1 demonstrate how each mandated element is addressed in the applicable chapter(s) of the General Plan.

Table 2: Mandated Elements by General Plan Chapter

ELK GROVE GENERAL PLAN CHAPTERS	MANDATED ELEMENTS ¹							
	Land Use	Circulation	Housing	Conservation	Open Space	Noise	Safety	Environmental Justice
Chapter 1: Introduction								
Chapter 2: Vision								
Chapter 3: Planning Framework	O	O	O	O	O		O	O
Chapter 4: Urban and Rural Development ²	X		X					O
Chapter 5: Economy and the Region								
Chapter 6: Mobility		X					O	
Chapter 7: Community and Resource Protection				X	X			
Chapter 8: Services, Health, and Safety		O				X	X	X
Chapter 9: Community and Area Plans	O	O	O	O	O	O	O	O
Chapter 10: Implementation Strategy ^b	O	O	O	O	O	O	O	O
Chapter 11: Glossary and Acronyms								
Chapter 12: Technical Information	T	T	T			T	T	T

Key:

X = Chapter that primarily addresses element requirements pursuant to the Government Code.

O = Chapter that has policies or discussion that supports the element requirements or addresses components pursuant to the Government Code not addressed in the primary chapter.

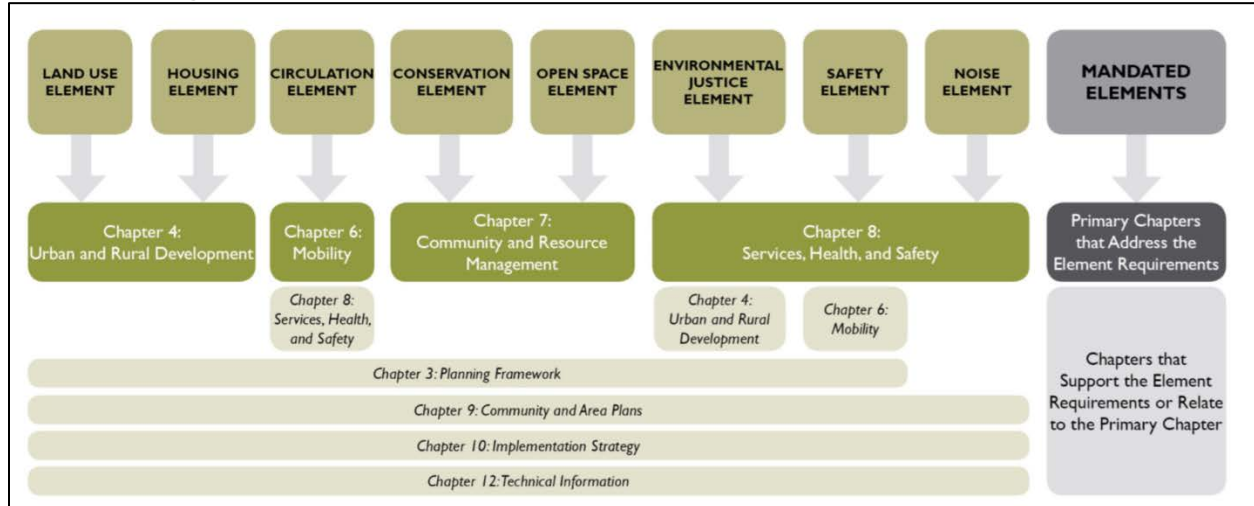
T = Chapter has technical information mandated by the element requirements in the Government Code.

Notes:

1. California Government Code Section 65302.

2. Chapter 4: Urban and Rural Development contains the Housing Element goals and policies, and Chapter 10: Implementation Strategy contains the Housing Element programs, which are updated separately from the remainder of the General Plan in order to comply with the mandated timelines for certification by the California Department of Housing and Community Development.

Figure 1: Mandated Elements by General Plan Chapter



Public Comments on the Draft General Plan

The City has received numerous public comments on the draft General Plan since it was released for public review. These comments have been provided in writing (letters, emails, and other written correspondence) and verbally at the Planning Commission workshops. In total, between the General Plan, the Climate Action Plan, and the Transportation Analysis Guidelines, over 560 indexed comments have been provided. Staff has reviewed all of these comments, compiled them into a comment log, and prepared responses to each. This log is provided as **Attachment 3** and is organized by chapter of the General Plan.

Revisions to the Draft General Plan

Changes Recommended by the Planning Commission

Based upon the public comments documented in the comment log, additional review by staff, and direction provided by the Planning Commission, revisions to the draft General Plan are proposed. These revisions can be found in **Exhibit B of Attachment 2 (Errata to the Draft General Plan)**. Revisions are presented in a matrix format in order by chapter/page of the document. Updated exhibits, as noted in the matrix, are presented at the end. Where revisions are based upon public comments, a cross reference to the comment is provided.

Major revisions to the draft General Plan identified in the Errata include the following:

- Revisions to the Supporting Principles based upon Planning Commission direction at the September 6 workshop.
- Revisions to the draft Land Use Map. These revisions address mapping errors, recent City Council-approved General Plan amendments (since July 2018), corrections to reflect current zoning (see East Elk Grove revision), and feedback from property owners during the outreach on the rezones being prepared in parallel with the General Plan Update.
- Updated language introducing the Study Area organizing principles.
- Revisions to policies in the Mobility Chapter based upon discussions between City staff and the Sacramento Area Council of Governments (SACOG).
- Removal of the Rural Area from the clustering policy as requested by public and Planning Commission (see both Chapters 7 and 9).
- Revisions to the policies regarding Tree Protection to also address canopy expansion as requested by the Planning Commission at the September 20 workshop.
- Update to the language in Chapter 8 regarding fire services based upon language provided by the Cosumnes Community Services District Fire Department.
- Updated introduction and policies under Goal EEG-1 for the Eastern Elk Grove Community Plan to clarify the distinction between the Triangle Area and East Elk Grove sub-areas.

At the August 22, 2018 City Council meeting, the Council directed that the North Study Area be revised to allow for 50-acres of public/quasi-public uses. This change was included in the draft Errata presented to the Planning Commission; however, the Commission recommends that the change be removed based upon compatibility concerns with the Rural Residential character of the area. The revisions provided in Exhibit B of Attachment 2 do not include the 50-acres of public/quasi-public uses but can be added back upon Council direction.

Triangle Area Revisions

At the January 23, 2019 City Council meeting, the Council provided direction on changes to the Triangle Area (between Bond Road, Bradshaw Road, and Grant Line Road, with Elk Grove Boulevard dividing the lower one-third from the upper two-thirds). The changes provide that:

- The area north of Elk Grove Boulevard will remain with minimum one-acre lot size
- The area south of Elk Grove Boulevard will include quarter-acre lots for the first 450± feet south, then fifth-acre lots for the balance.
- A berm would also be provided along Elk Grove Boulevard and along Grant Line Road north of Elk Grove Boulevard.
- Walls within landscape corridors would be provided along Grant Line Road south of Elk Grove Boulevard and along Bradshaw Road.
- Development on sites of one acre or less would be limited to single story.

Staff has reviewed this direction and the changes can be accommodated without triggering additional environmental review. The difference between these revisions and what was analyzed in the EIR is one dwelling unit less. The necessary mapping revisions have been incorporated into the Errata included in **Attachment 2**.

Additional Revisions

Staff recommends two additional revisions be made to the General Plan, which are included in the Errata and summarized as follows:

- Revise the discussion of Floor Area Ratio (FAR) in Chapter 3 (Planning Framework) to clarify what is included in the FAR calculation. Implementing language will be included in the upcoming Zoning Code update. This is identified in the Errata as revision number 14A.
- Revise the definition of Compatibility in Chapter 11 (Glossary and Acronyms) to provide more clarity on what compatibility means and how compatibility between existing and new development should be considered. This is identified in the Errata as revision number 147C.

ENVIRONMENTAL ANALYSIS

The California Environmental Quality Act (Section 21000, et. seq. of the California Public Resources Code, hereafter CEQA) requires analysis of agency approvals of discretionary “projects.” A “project,” under CEQA, is defined as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” The proposed General Plan Update is a project under CEQA. Adoption of the General Plan requires an Environmental Impact Report (EIR). The EIR is comprised of a Draft EIR (Draft EIR) and Final EIR (Final EIR) as described herein.

The City prepared a Notice of Preparation (NOP) and circulated it to public agencies and interested parties (including the general public) on June 23, 2017, once a draft Vision and supporting principles and preferred land plan were identified by the City Council. The NOP provided an introduction to the Project. Comments on the scope of the EIR were requested by July 24, 2017, consistent with the requirements of the State CEQA Guidelines. Comments received on the NOP are included in the Draft EIR (Appendix B) and responses are provided in Chapter 1.

The Draft EIR has been prepared as a Program EIR pursuant to CEQA Guidelines Section 15168. A Program EIR examines the environmental impacts of an overall area that may contain a series of subsequent projects. This type of EIR focuses on the changes in the environment that would result from implementation of the overall Project, including development of land uses and transportation systems identified in the Project, as well as other infrastructure required to serve the Project. The General Plan Update EIR will serve as the environmental review document for subsequent activities in the program. Consistent with CEQA Guidelines Section 15168(c), the City will review subsequent activities to determine whether the activity is within the scope of the Project covered by the Program EIR or whether an additional environmental document must be prepared.

The Draft EIR identified a range of potential impacts resulting from adoption of the General Plan. Some of these impacts are analyzed in comparison to existing plans and programs, including the existing General Plan. The impact areas come from the State’s CEQA guidelines (the CEQA Checklist).

Staff has also included pending changes to the CEQA Checklist, including the forthcoming revisions for Vehicle Miles Traveled. This Draft EIR bridges the existing and forthcoming CEQA Checklist in order to provide coverage for future projects.

The EIR has identified the following environmental issue areas as having potentially significant environmental impacts from implementation of the Project:

- Aesthetics, Light, and Glare
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology, Soils, Mineral Resources, and Paleontology
- Greenhouse Gas Emissions and Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services and Recreation
- Public Utilities
- Transportation

Conclusions to the potential impacts are classified as either less than significant, less than significant after incorporation of mitigation measures, or significant and unavoidable. Significant and unavoidable impacts do not limit the City's ability to approve a project. Rather, given CEQA's role in providing disclosure of potential impacts, the City may approve a project with significant impacts that cannot be mitigated to a less than significant level. CEQA Guidelines Section 15093 states that "CEQA requires the [City] to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.' When the [City] approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the [City] shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record." A Statement of Overriding Considerations is necessary to approve the General Plan Update.

On July 27, 2018, concurrent with the public availability of the draft General Plan, the City released the Draft EIR. The Draft EIR was made available for public review and comment on the City's website, at City Hall, and at the Elk Grove and Franklin libraries for a period of 60 days. Public comments on the Draft EIR were due to the City on September 26, 2018. A total of 17 comment letters were received. Responses to these comments have been prepared by staff and are included in the Final EIR.

The Final EIR also includes an erratum of changes to the Draft EIR as a result of the public comments on the Project, the comments to the Draft EIR, and other revisions to the Project as identified by the City (the Planning Commission, staff). The Final EIR indicates that the modifications to the Project are minor in nature and do not cause any change in significant impacts that were analyzed in the Draft EIR.

ALTERNATIVE ACTIONS:

All of the following options are available to the City Council:

1. Adopt the General Plan as recommended by the Planning Commission (note, this excludes the 50-acres of public/quasi-public use in the North Study Area);
2. Adopt the General Plan with additional revisions as directed by the City Council, such as including the 50-acres of public/quasi-public use in the North Study Area. Staff does not feel that this 50-acre addition would necessitate further environmental review. Note, however, that if there were other changes that call for major revisions to the land plan or policies, additional environmental review may be required; or
3. Continue the hearing to a future Council date to allow for additional review.

Staff notes that there are some development projects that are anticipating adoption of the General Plan and are awaiting hearing dates. These dates cannot be set until the General Plan is adopted. Delays in adoption of the General Plan may delay these projects.

FISCAL IMPACT:

The cost of preparation of the General Plan has been included over several Fiscal Year budgets. The City has a General Plan Impact Fee Program which collects some of the funding to reimburse for the cost of plan preparation.

ATTACHMENTS:

1. Resolution for CEQA
 - A. Draft EIR*
 - B. Final EIR
 - C. Findings of Fact and Statement of Overriding Considerations
 - D. Mitigation Monitoring and Reporting Program

2. Resolution Adopting the General Plan
 - A. Draft General Plan dated July 2019*
 - B. General Plan Errata

3. Public Comment Matrix

* *Denotes that, due to length, materials were provided under separate cover. Copies may be viewed at the City Clerk's Office or on the City's website at www.elkgrovecity.org/generalplan.*

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ELK GROVE
CERTIFYING THE ENVIRONMENTAL IMPACT REPORT FOR THE GENERAL PLAN
AND ADOPTING FINDINGS OF FACT AND STATEMENT OF OVERRIDING
CONSIDERATIONS AND A MITIGATION MONITORING AND REPORTING
PROGRAM**

**General Plan Update
Project No. PL0022**

WHEREAS, California Government Code Section 65300 requires the City adopt a comprehensive, long-term general plan for the physical development of the City; and

WHEREAS, the City adopted its first General Plan in on November 19, 2003; and

WHEREAS, since adoption of the General Plan in 2003, the City has grown and changed and numerous developer and City-initiated amendments to the current General Plan have been adopted, including, but not limited to, the following

- Laguna West, annexed 2004
- Laguna Ridge Specific Plan, adopted 2004
- Safety Element, updated 2005 and 2015
- Housing Element, updated 2009 and 2014
- Sustainability Element and Climate Action Plan, adopted 2013
- Southeast Policy Area Community Plan, adopted 2014; and

WHEREAS, since 2003, the City has not comprehensively updated its General Plan; and

WHEREAS, the conditions in the City and the requirements for general plans under State law have changed since 2003; and

WHEREAS, in 2015, the City Council directed that a comprehensive update to the City's General Plan be completed; and

WHEREAS, in accordance with Section 65351 of the California Government Code, the City has facilitated public participation in the General Plan process; and

WHEREAS, the City determined that the General Plan Update (also referred to herein as "Project") was a project requiring review pursuant to the California Environmental Quality Act (CEQA), Public Resources Code 21000 et seq. and that an Environmental Impact Report (EIR) shall be prepared to evaluate the potential environmental effects of the Project; and

WHEREAS, a Notice of Preparation was released for public and agency review and comment on June 23, 2017, for the General Plan Update Draft EIR, with the public review period starting June 23, 2017, and ending on July 24, 2017, and a public scoping meeting to receive comments on topics and issues which should be evaluated in the Draft EIR was held by the City on July 11, 2017; and

WHEREAS, upon receipt of the Notice of Preparation, the State Clearinghouse issued State Clearinghouse Number SCH# 2017062058 for the Project; and

WHEREAS, the Draft EIR, provided herein as Exhibit A, was released for public review on July 27, 2018, and was made available at City Hall, at the Elk Grove and Franklin Public Libraries, and on the City's website; and

WHEREAS, in accordance with Government Code Section 65352, the City referred the proposed draft General Plan to numerous agencies and entities and provided each with adequate time in which to comment on the draft General Plan; and

WHEREAS, the City distributed a Notice of Availability for the General Plan Update Draft EIR on July 27, 2018, which started a public review period, ending on September 26, 2018; and

WHEREAS, the Notice of Completion for the Draft EIR was also submitted to the State Clearinghouse for state agency review with Public Review Period starting July 27, 2018, and ending on September 26, 2018; and

WHEREAS, the City held a public meeting on September 13, 2018, to receive public comments on the Draft EIR and those comments were received and considered in the Final EIR; and

WHEREAS, the Draft EIR identified several significant and unavoidable environmental impacts of the General Plan. Approval of the General Plan therefore requires the adoption of a Statement of Overriding Considerations by the City Council; and

WHEREAS, the Draft EIR identified several potentially significant impacts that will be reduced to insignificance with specific mitigation measures. Approval of the General Plan will therefore require adoption of mitigation findings and a Mitigation Monitoring Program; and

WHEREAS, a Final EIR, provided herein as Exhibit B, has been prepared, identifying an erratum of changes to the Draft EIR as a result of the public comments on the Project, the comments to the Draft EIR, and other revisions to the Project, as identified by the City; and

WHEREAS, the Planning Commission held a duly-noticed public hearing on January 17, 2019, as required by law to consider all of the information presented by staff and public testimony presented in writing and at the meeting and voted 4-0 to recommend certification of the EIR; and

WHEREAS, the City Council held a duly-noticed public hearing on February 27, 2019, as required by law to consider all of the information presented by staff and public testimony presented in writing and at the meeting.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Elk Grove as follows:

1. Certification of the Final EIR

- A. The City Council hereby certifies that the Final EIR has been completed in compliance with the requirements of the California Environmental Quality Act.
- B. The City Council hereby certifies that the Final EIR was presented to the City Council and that the City Council reviewed and considered the information contained in the Final EIR prior to taking action on the Project.
- C. The City Council hereby certifies that the Final EIR reflects the independent judgment and analysis of the City Council.

2. Findings on Impacts

The City Council finds that the Final EIR identifies potentially significant impacts that cannot be mitigated to a less than significant level and are thus considered significant and unavoidable. The City Council makes the findings with respect to these significant and unavoidable impacts as set forth in Exhibit C.

3. Findings on Alternatives

The City Council finds that the alternatives analyzed in the Final EIR are rejected because the alternatives would not achieve the project objectives. The City Council makes the finding as set forth in Exhibit C, attached hereto and incorporated herein by reference.

4. Statement of Overriding Considerations

The City Council finds that there are no feasible mitigation measures or project alternatives that would mitigate or substantially lessen the impacts from the Project. Despite the occurrence of these significant effects, however, the City Council chooses to approve the Project because, in its view, the environmental, social, and other benefits of the project will render the significant effects acceptable as described in Statement of Overriding Considerations as set forth in Exhibit C.

5. Adoption of the Mitigation Monitoring and Reporting Program

- A. The City Council hereby finds that the proposed mitigation measures described in the EIR and Findings are feasible, and therefore will become binding upon the City and on future actions. The Mitigation Monitoring and Reporting Program is included as Exhibit D.

B. The City Council hereby adopts the Mitigation Monitoring and Reporting Program, as set forth in Exhibit D, attached hereto and incorporated herein by reference.

PASSED AND ADOPTED by the City Council of the City of Elk Grove this 27th day of February 2019.

STEVE LY, MAYOR of the
CITY OF ELK GROVE

ATTEST:

APPROVED AS TO FORM:

JASON LINDGREN, CITY CLERK

JONATHAN P. HOBBS
CITY ATTORNEY

Exhibit A
General Plan Update Draft EIR

Due to length this material was provided under separate cover. Copies may be viewed at the City Clerk's Office or on the City's website at www.elkgrovecity.org/generalplan.

CITY OF ELK GROVE GENERAL PLAN UPDATE FINAL ENVIRONMENTAL IMPACT REPORT

SCH No. 2017062058



Prepared by:

CITY OF ELK GROVE
8401 LAGUNA PALMS WAY
ELK GROVE, CA 95758

JANUARY 2019

CITY OF ELK GROVE GENERAL PLAN UPDATE FINAL ENVIRONMENTAL IMPACT REPORT

SCH No. 2017062058

Prepared by:
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JANUARY 2019

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1.0 INTRODUCTION

1.1 PURPOSE AND BACKGROUND

This document is a Final Environmental Impact Report (EIR) prepared in accordance with the California Environmental Quality Act (CEQA; Public Resources Code Sections 21000–21177). This document contains public comments received on the Draft Environmental Impact Report (Draft EIR; SCH# 2017062058) for the City of Elk Grove General Plan Update (Project). Written comments were received by the City of Elk Grove during the public comment period from July 27, 2018, through September 26, 2018. This Final EIR includes written responses to environmental issues raised in comments on the Draft EIR. The responses in the Final EIR clarify, correct, and amplify text in the Draft EIR, as appropriate. Also included are revisions to the Draft EIR made in response to comments on the Draft EIR and/or at the initiative of the lead agency (City of Elk Grove). These changes do not alter the conclusions of the Draft EIR.

1.2 PROJECT UNDER REVIEW

1.2.1 PROJECT ANALYZED IN THE DRAFT EIR

The Project analyzed in the Draft EIR is the City's General Plan Update. The Project includes the following components as directed by the City Council:

- **General Plan Update.** The General Plan and implementing programs serve as the blueprint for future growth and development. The General Plan would provide for the future development of approximately 48,102 housing units, as well as the creation of approximately 77,339 jobs.
- **Climate Action Plan Update.** The updated Climate Action Plan (CAP) will include an updated community-wide emissions inventory for Elk Grove, along with updated emissions forecasts for 2020, 2030, and 2050 based on land use activities anticipated with implementation of the updated General Plan.
- **Specific Plan Actions.** To implement the policies and programs proposed in the General Plan update, the Project includes changes to the East Elk Grove Specific Plan, the East Franklin Specific Plan, and the Laguna Ridge Specific Plan.
- **Zoning Code Amendments.** To maintain consistency with the updated General Plan, the Project also includes a number of amendments to the Zoning Code.

Parks and Recreation Master Plan Update. The Cosumnes Community Services District (CCSD) is preparing an update to the Parks and Recreation Master Plan that will be coordinated with the General Plan Update.

The City has identified the following objectives for the proposed Project:

- 1) Provide for growth of the City to meet long-term needs, including housing, employment, and recreational opportunities.
- 2) Facilitate orderly and logical development, including economic development, while maintaining the character of existing communities.
- 3) Provide an improved transportation system that includes an array of travel modes and routes, including roadways, mass transit, walking, and cycling.

1.0 INTRODUCTION

- 4) Protect open space, providing trails, parkland, and a range of recreational opportunities.
- 5) Provide mechanisms to minimize noise and safety risks associated with natural and human-caused noise and safety hazards.
- 6) Promote sustainability and community resiliency through reductions in vehicle miles traveled, improved air quality, reductions in energy usage, and a diversified economy.
- 7) Provide and support public facilities and infrastructure with sufficient capacity to adequately serve the needs of the growing community.

1.3 TYPE OF DOCUMENT

The State CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. As discussed further below, a program EIR (State CEQA Guidelines Section 15168) is appropriate for land use decision-making at a broad level that contemplates further project-level review of subsequent individual development proposals. Project EIRs are appropriate for specific proposed projects that will not require additional site-specific environmental review (State CEQA Guidelines Section 15161). Thus, this document has been prepared as a program EIR pursuant to CEQA Guidelines Section 15168.

1.4 PUBLIC PARTICIPATION AND REVIEW PROCESS

The City of Elk Grove notified all responsible and trustee agencies and interested groups, organizations, and individuals that the Draft EIR on the proposed project was available for review. The following list of actions took place during the preparation, distribution, and review of the Draft EIR:

NOTICE OF PREPARATION AND INITIAL STUDY

In accordance with Section 15082 of the CEQA Guidelines, the City released a Notice of Preparation (NOP) on June 23, 2017, with a comment period from June 23, 2017, to July 24, 2017. This notice was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments on the Project. A copy of the NOP is included in Appendix A of the Draft EIR. Public and agency responses to the NOP are included in Appendix B of the Draft EIR in accordance with CEQA. The City held a scoping meeting on July 11, 2017. No public or agency comments were submitted at the scoping meeting.

DRAFT EIR PUBLIC NOTICE/PUBLIC REVIEW

The Draft EIR was circulated for public review and comment for a period of 60 days from July 27, 2018, through September 26, 2018. A public hearing was held on the Draft EIR for this Project on September 13, 2018.

Copies of the Draft EIR were available for review at the following locations:

- The City of Elk Grove City Hall, Planning Division, 8401 Laguna Palms Way
- The Elk Grove Branch of the Sacramento Public Library at 8962 Elk Grove Boulevard
- The City's Planning Department website at www.egplanning.org/environmental/

1.5 ORGANIZATION OF THIS DOCUMENT

For this Final EIR, comments and responses are grouped by comment letter. As the subject matter of one topic may overlap between letters, the reader must occasionally refer to one or more responses to review all the information on a given subject. To assist the reader, cross-references are provided. The comments and responses that make up the Final EIR, in conjunction with the Draft EIR, as amended by the text changes, constitute the EIR that will be considered for certification by the City of Elk Grove.

The Final EIR is organized as follows:

Section 1 – Introduction: This section includes a summary of the project description and the process and requirements of a Final EIR.

Section 2 – Errata: This section lists the revisions to the Draft EIR.

Section 3 – List of Agencies and Persons Commenting: This section contains a list of the agencies or persons who submitted comments on the Draft EIR during the public review period.

Section 4 – Comments and Responses: This section contains the comment letters received on the Draft EIR and the corresponding response to each comment. Public agency letters are given a letter designation, and private organizations and individuals are given a number designation, and each comment on an environmental issue in the letter is given a number designation. Responses are provided after the letter in the order in which the comments appear. Where appropriate, responses are cross-referenced between letters. The responses following each comment letter are intended to supplement, clarify, or amend information provided in the Draft EIR or refer the commenter to the appropriate place in the document where the requested information can be found. Those comments not directly related to environmental issues may be discussed or noted for the record.

1.0 INTRODUCTION

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2.0 ERRATA

2.1 INTRODUCTION

This section presents minor corrections and revisions made to the Draft EIR initiated by the public, the lead agency, and/or consultants based on their ongoing review. Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis. New text is indicated in underline, and text to be deleted is reflected by a strikethrough unless otherwise noted in the introduction preceding the text change. Revisions are presented in the page order in which they appear in the Draft EIR.

2.2 CHANGES AND EDITS TO THE DRAFT EIR

EXECUTIVE SUMMARY

Table ES-1 is revised to include the following changes in mitigation measure MM 5.12.1.1 on page ES-20:

Prior to LAFCo approval of annexation of any portion of the Planning Area into the City of Elk Grove ~~for which the SCWA would be the retail provider for water service~~, the City must prepare the Plan for Services to allow LAFCo to determine that: (1) the requirement for timely water availability, as required by law, is met; (2) its water purveyor is a signatory to the Water Forum Successor Effort and that groundwater will be provided in a manner that ensures no overdraft will occur, (3) the amount of water provided will be consistent with the geographical extent of the annexation territory; and (4) existing water customers will not be adversely affected. The Plan for Services shall be sufficient for LAFCo to determine timely water availability to the affected territory pursuant to Government Code Section 56668, subdivision (l), or its successor.

The Plan for Services shall demonstrate that the ~~SCWA~~ water supplies are adequate to serve the amount of development identified in the annexation territory, in addition to existing and planned development under normal, single-dry, and multiple-dry years. The Plan for Services shall depict the locations and approximate sizes of all on-site water system facilities to accommodate the amount of development identified for the specific annexation territory; demonstrate that the service provider ~~SCWA~~ has annexed the territory into its service area; and demonstrate that adequate ~~SCWA~~ off-site water facilities are available to accommodate the development identified in the annexation territory, or that fair-share funding will be provided for the construction of new or expanded treatment and/conveyance facilities and/or improvement of existing off-site water system facilities with no adverse fiscal impacts on existing ratepayers.

1.0 INTRODUCTION

No changes were made to this section.

2.0 PROJECT DESCRIPTION

Figures 2.0-3, Preferred Alternative Land Use Map, and 2.0-4, Transportation Network Diagram have been amended, as shown at the end of this chapter.

2.0 ERRATA

3.0 DEMOGRAPHICS

No changes were made to this section.

4.0 LAND USE

No changes were made to this section.

5.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

No changes were made to this section.

5.1 AESTHETICS, LIGHT, AND GLARE

No changes were made to this section.

5.2 AGRICULTURAL RESOURCES

No changes were made to this section.

5.3 AIR QUALITY

The following revisions have been made to the first paragraph on page 5.3-18:

The SMAQMD requires projects that exceed the PM10 and PM2.5 emissions thresholds after implementation of the Basic Practices to implement all feasible and applicable measures of the Enhanced Fugitive PM Dust Control Practices. Implementation of the Enhanced Fugitive PM Dust Control Practices will reduce total fugitive PM dust emissions by an additional 21 percent above the Basic Practices (SMAQMD 2017a).

The following text has been added following the bulleted list on page 5.3-27.

SMAQMD has developed guidance based on EPA's Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality. In April 2017, SMAQMD published the Landscaping Guidance for Improving Air Quality Near Roadways (Landscape Guidance) to provide recommendations to projects constructed within the Sacramento Valley Air Basin in consideration of local climate and appropriate flora. SMAQMD developed the Landscape Guidance in coordination with the Sacramento Tree Foundation. Based on the information presented in the Landscape Guidance, the following recommendations could apply to the project to reduce exposure from mobile-source TAC emissions (SMAQMD 2017b).

In light of the California Building Industry Association v. Bay Area Air Quality Management District (2015) 62Cal.4th 369, SMAQMD expanded its Guide to Air Quality Assessment in Sacramento County and published Recommendations for Siting New Project Near Existing Sources that Emit Odors and Toxic Air Contaminants. Recommendations to reduce TAC exposure that lead agencies could apply to development under the proposed Project include, but are not limited to, the following (SMAQMD 2017c):

- identifying sources that emit TACs within 0.5-miles of a proposed project site,

- evaluating the meteorology of a project site and area.
- conduct a health risk assessment (HRA).
- provide vegetative barriers between the source and receptors, and
- install HVAC systems capable of at least MERV 13 in each proposed building.

Compliance with the aforementioned SMAQMD guidance documents would serve to reduce the opportunity for a sensitive receptor to be subject to prolonged exposure to high concentrations of TACs.

The following revisions have been made to the first sentence of the fifth paragraph on page 5.3-27:

General Plan Policy NR-4-9 prohibits the future siting of sensitive land uses (including schools) within distances specified by the ~~SMAQMD-CARB~~ of stationary sources of TACs unless adequate mitigations measures are adopted and implemented.

The following revisions have been made to the first sentence of the second paragraph on page 5.3-28:

These permitting requirements are identical to the SMAQMD's thresholds of significance for TACs generated by stationary sources ~~or land uses that include nonpermitted sources (e.g., truck distribution yards)~~. Therefore, lead agencies can determine that a new stationary source of TACs that attains the authority to construct and permit to operate from the district would not exceed the SMAQMD's applicable TAC thresholds of significance.

The following revisions have been made to the fifth paragraph on page 5.3-28:

All feasible mobile source TAC health risk reduction measures have been incorporated into the Project through the inclusion of the General Plan policies discussed above. There could be additional project-specific mitigation measures to reduce the health risks of mobile-source TACs ~~to levels below the SMAQMD's thresholds of significance~~. However, the nature, feasibility, and effectiveness of such project-specific mitigation cannot be determined at this time. As such, the City cannot assume that mitigation would be available and implemented such that all future health risk increases (~~i.e.~~ e.g., an incremental increase in cancer risk greater than 10 in one million or concentrations of TACs with a Hazard Index greater than 1) from exposure to TACs would be reduced to less than significant levels. Therefore, this impact would remain significant and unavoidable.

The following revisions have been made on page 5.3-34:

_____. 2017a. CEQA Guidelines – Chapter 3, Construction-Generated Criteria Air Pollutant and Precursor Emissions. Accessed December 8, 2017.
<http://www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools>.

_____. 2017b (April). Landscaping Guidance for Improving Air Quality Near Roadways. Accessed October 20, 2017.

<http://www.airquality.org/LandUseTransportation/Documents/SMAQMDFinalLandscapeGuidanceApril2017.pdf>.

_____. 2017c (May). Recommendations for Siting New Projects Near Existing Sources that Emit Odors and Toxic Air Contaminants. Accessed October 20, 2018. <http://www.airquality.org/LandUseTransportation/Documents/ExistingOdorsToxicsRecommendationsFinal5-12-17.pdf>.

5.4 BIOLOGICAL RESOURCES

The following changes are made to natural resources policies on page 5.4-52:

Policy NR-2-1: Preserve large native oak and other native tree species as well as large non-native tree species that are an important part of the City's historic and aesthetic character. When reviewing native or non-native trees for preservation, consider the following criteria:

- Aesthetic value
- Biological value
- Shade benefits
- Water quality benefits
- Runoff reduction benefits
- Air quality benefits (pollutant reduction)
- Health of the tree
- Safety hazards posed by the tree
- Suitability for preservation in place

Policy NR-2-2: Maximize ~~and maintain~~ tree canopy coverage on public lands and in open spaces by continuing to plant new trees and ensuring sufficient right-of-way width for new developments to provide tree plantings.

Policy NR-2-3: Maintain tree health and canopy coverage throughout Elk Grove by managing and caring for all trees on public lands.

Policy NR-2-4: Preserve and plant trees in appropriate densities and locations to maximize energy conservation and air quality benefits.

Policy NR-2-35: Ensure that trees that function as an important part of the City's or a neighborhood's aesthetic character or as natural habitat on public and private land are retained or replaced to the extent possible during the development of new structures, roadways (public and private, including roadway widening), parks, drainage channels, and other uses and structures.

Policy NR-2-6: Promote the planting of shade trees with substantial canopies as part of private development projects and require, where feasible, site design that uses trees to shade rooftops, parking facilities, streets, and other facilities.

Policy NR-2-4: ~~Maintain and enhance an urban forest by preserving and planting trees in appropriate densities and locations to maximize energy conservation and air quality benefits.~~

5.5 CULTURAL RESOURCES

On page 5.5-15, mitigation measure

5.6 GEOLOGY, SOLIS, AND SEISMICITY

No changes were made to this section.

5.7 GREENHOUSE GAS EMISSIONS

The following change is made to policies on page 5.7-29:

Policy ER-6-6: Work with the Sacramento County Water Agency, Elk Grove Water ~~Agency District~~, and other water utilities to support programs and conservation activities intended to help water customers voluntarily conserve approximately 10 percent over time.

Policy ER-6-9: ~~Participate in the development and~~ Facilitate implementation of ~~measures identified in the Metro Fire's Cosumnes Fire Department's~~ Community Wildfire Protection Plan (CWPP) for the protection of human life and reduction in loss of property, critical infrastructure, and natural resources associated with wildfire.

5.8 HAZARDS AND HAZARDOUS MATERIALS

No changes were made to this section.

5.9 HYDROLOGY AND WATER QUALITY

Figure 5.9-3, 200-Year Floodplain, has been updated as shown at the end of this chapter.

The following change is made to policies on page 5.9-30:

Policy ER-2-14: Parcels should not be created where any of the parcel's access or preservation easements, floodplain, marsh or riparian habitat, or other features would leave insufficient land to build and operate structures. This policy shall not apply to open space lots specifically created for dedication to the City or another appropriate ~~entity party~~ for habitat protection, flood hazard management, drainage, or wetland maintenance.

Policy ER-2-17: Require all new ~~urban~~ development projects to incorporate runoff control measures to minimize peak flows of runoff and/or assist in financing or otherwise implementing comprehensive drainage plans.

Policy ER-2-18: Drainage facilities ~~should~~ shall be properly maintained to ensure their proper operation during storms.

The following change is made to Policy INF-1-1 on page 5.9-31:

2.0 ERRATA

Water supply and delivery systems shall be available in time to meet the demand created by new development, ~~or shall be assured through the use of bonds or other sureties to the City's satisfaction.~~

5.10 NOISE

No changes were made to this section.

5.11 PUBLIC SERVICES AND RECREATION

The following change is made on page 5.11-1 in the first paragraph under the "Cosumnes Community Services District Fire Department" subheading:

Fire protection services in the Planning Area are provided by the Cosumnes Community Services District (CCSD). Services include fire suppression, fire prevention, emergency medical services, technical rescue, and arson and explosion investigations in a 157-square-mile service area covering the City, Galt, and a portion of unincorporated southern Sacramento County. The service area encompasses a population of more than 202,000~~185,000~~. The CCSD has 175 personnel in its Operations Division and operates out of eight fire stations with eight advanced life support (ALS) engine companies, one aerial ladder truck company, six-seven rescue ambulance units, and one command vehicle, as well as other specialized apparatus for specialized emergency circumstances (CCSD 2017a). In 2017~~2016~~, the CCSD responded to 18,592 19,775 incidents, an ~~8.2~~ 6.3 percent ~~decrease~~ increase from 2016~~2015~~. The CCSD's fire stations are at the following locations:

The following change is made on page 5.11-1 in the paragraph following the bulleted items:

In addition, three new fire stations are planned in the Planning Area: (1) Station 77 to be located within the Laguna Ridge Specific Plan Area near the intersection of Poppy Ridge Road and Big Horn Boulevard ~~Whitelock Parkway~~; (2) Station 78, to be located within the South Pointe Land Use Policy Area near the intersection of Lotz Parkway and Bilby Road ~~Kammerer Road~~; and (3) Station 79 to be located within the Eastern Elk Grove Community Plan Area near the intersection of Bradshaw Road and Grant Line Road.

The following change is made on page 5.11-2 under the "Uniform Fire Code" subheading:

California Uniform Fire Code

The California Uniform Fire Code (Fire Code) (California Code of Regulations, Title 24, Part 9) contains regulations relating to construction, maintenance, and use of buildings.

The following text is added to the State regulatory setting portion on page 5.11-2 following the discussion of the California Health and Safety Code:

Fire Protection District Law of 1987

The Fire Protection District Law (Health & Safety Code §13800, et seq.) is the source of statutory authority for more than 380 fire protection districts. The Legislature adopted this revised statute in 1987 after a study that culminated in Senate Bill 515. Then the Chairman of the Senate Local Government Committee, State Senator Marian Bergeson, authored

SB 515, which was the first complete revision of the fire district laws since 1961. These edits do not change the conclusions of the EIR. No further response is required.

The following change is made to the policies on page 5.11-3:

Policy ER-4-1: Cooperate with the Cosumnes Community Services District (CCSD) Fire Department to reduce fire hazards, assist in fire suppression, and promote fire and life safety in Elk Grove.

Standard ER-4-1.a: Require, where appropriate, on-site fire suppression systems for all new commercial and industrial development to ~~reduce the dependence on fire department equipment and personnel~~ improve fire and life safety.

The following change is made to the impact statement and the first sentence of the paragraph immediately following on pages 5.11-3 and 5.11-4:

Impact 5.11.1.1 Implementation of the proposed Project would increase demand for fire prevention, fire protection, and emergency medical services, which could trigger the need for additional fire stations, the construction of which could result in impacts on the physical environment. This impact would be **less than significant.**

Implementation of the proposed Project in accordance with the proposed Land Use Diagram would result in new development and associated population growth, which would increase demand for fire prevention, fire protection, and emergency medical services, thus requiring additional fire inspectors, firefighters, paramedics, and other personnel. This increase in population is discussed in Section 3.0, Demographics, and the environmental impacts associated with the population increase are addressed throughout the technical sections (Sections 5.1 through 5.13) of this EIR.

The following change is made to the first sentence of the second paragraph under the "Existing Regulations and Standards and Proposed General Plan Policies That Provide Mitigation" subheading on page 5.11-4.

The CCSD Fire Department receives its funding through property taxes, development impact fees, fees for service, and grant funding and can, therefore, fund expanded services as new development occurs. Pursuant to Municipal Code Chapter 16.85, Elk Grove Fire Fee, all new development projects would be required to pay fire protection development fees to fund additional facilities and equipment. These funds would help to pay for costs associated with the development of new fire stations, if needed, including any required environmental analysis.

The following change is made to the first sentence in the paragraph under the "Conclusion" subheading on page 5.11-4:

Conclusion

Buildout of the Planning Area in accordance with the proposed Project would increase the number of residents and jobs in the City, which would increase demand for fire prevention, fire protection, and emergency medical services.

2.0 ERRATA

The following change is made to the impact statement 5.11.1.2 and the first sentence of the paragraph immediately following on page 5.11-5:

Impact 5.11.1.2 Implementation of the proposed Project, in combination with other development within the CCSD's service area, would increase demand for fire prevention, fire protection, and emergency medical services. This impact would be **less than cumulatively considerable**.

With adoption and implementation of the Project, proposed, approved, and reasonably foreseeable development in the CCSD service area would increase the demand for fire prevention, fire protection, and emergency medical services, which would result in the need for new fire protection facilities, the construction of which could result in physical environmental effects. This is a potentially significant cumulative impact.

The first sentence at the bottom of page 5.11-14, under subheading Cosumnes Community Services District is modified as follows:

The CCSD provides parks and recreation services to the City and in the CCSD boundaries through its Parks and Recreation Department.

The text in the first sentence in the second paragraph under subheading "Park Descriptions and Park Design Principles" on page 5.11-15 is amended as follows:

The CCSD ~~is preparing~~ approved an update to the Parks and Recreation Master Plan on August 15, 2018.

The following text is deleted from page 5.11-16:

Regional Park

~~Regional parks serve a large area of several communities, residents within a city or county, or across multiple counties. Depending on activities within a regional park, users may travel as many as 60 miles for a visit. Regional parks include recreational opportunities such as soccer, softball, golf, boating, camping, conservation wildlife viewing, and fishing. Although regional parks usually have a combination of passive areas and active facilities, they are likely to be predominantly natural resource-based parks.~~

~~Regional parks are commonly 100 to 1,000 acres, but some can be 2,000 to 5,000 acres in size. A regional park focuses on activities and natural features not included in most types of parks and are often based on a specific scenic or recreational opportunity. Facilities could include those found in a community park as well as specialized amenities such as an art center, amphitheater, boating facility, golf course, or natural area with interpretive trails. Regional parks can and should promote tourism and economic development, as they can enhance the economic vitality and identity of the entire region.~~

5.12 PUBLIC UTILITIES

The following changes are made to policies on page 5.12-20:

Policy ER-6-6: Work with the Sacramento County Water Agency, Elk Grove Water District, and other water utilities to support programs and conservation

activities intended to help water customers voluntarily conserve approximately 10 percent over time.

Policy SRA-2-4: Limit the extension of water service into the ~~Sheldon/Rural Area~~. Lot sizes should be large enough to accommodate private water wells. This policy shall not be construed to limit the ability of any water agency to construct transmission lines through or adjacent to the Sheldon/Rural Area.

Policy SRA-2-5: Lots ~~should~~ shall be large enough to accommodate private water wells with adequate spacing to minimize the potential for groundwater depletion. Lots shall have a minimum size of 2+ acres parcels that are large enough to accommodate private water wells with adequate spacing to minimize the potential for groundwater contamination with septic system.

The following change is made to mitigation measure MM 5.12.1.1 on page 5.12-23:

Prior to LAFCo approval of annexation of any portion of the Planning Area into the City of Elk Grove ~~for which the SCWA would be the retail provider for water service~~, the City must prepare the Plan for Services to allow LAFCo to determine that: (1) the requirement for timely water availability, as required by law, is met; (2) its water purveyor is a signatory to the Water Forum Successor Effort and that groundwater will be provided in a manner that ensures no overdraft will occur, (3) the amount of water provided will be consistent with the geographical extent of the annexation territory; and (4) existing water customers will not be adversely affected. The Plan for Services shall be sufficient for LAFCo to determine timely water availability to the affected territory pursuant to Government Code Section 56668, subdivision (l), or its successor.

The Plan for Services shall demonstrate that the ~~SCWA~~ water supplies are adequate to serve the amount of development identified in the annexation territory, in addition to existing and planned development under normal, single-dry, and multiple-dry years. The Plan for Services shall depict the locations and approximate sizes of all on-site water system facilities to accommodate the amount of development identified for the specific annexation territory; demonstrate that the service provider SCWA has annexed the territory into its service area; and demonstrate that adequate ~~SCWA~~ off-site water facilities are available to accommodate the development identified in the annexation territory, or that fair-share funding will be provided for the construction of new or expanded treatment and/conveyance facilities and/or improvement of existing off-site water system facilities with no adverse fiscal impacts on existing ratepayers.

The following changes are made to policies on page 5.12-30:

Policy INF-2-4: Residential development on lots smaller than 2 gross acres shall be required to connect to public sewer service, except in the Rural Area. This policy shall not apply to lots smaller than 2 gross acres within the Rural Area Community Plan that existed as legal lots as of November 19, 2003.

Policy SRA-2-1: Prohibit the extension of sewer service into the Sheldon/Rural Area. Lots in the Sheldon/Rural Area ~~shall~~ should be large enough to accommodate septic systems. This policy shall not be construed to limit the ability of any sewer agency to construct interceptor lines through or adjacent to the Sheldon/Rural Area, provided that no trunk or service lines are included.

2.0 ERRATA

5.13 TRANSPORTATION

The following change is made to text in the second paragraph of Policy MOB-1-1 on page 5-13-30 is revised as follows:

Projects that do not achieve the daily VMT limits outlined below shall be subject to all feasible mitigation measures necessary to reduce the VMT for, or induced by, the project to the applicable limits. If the VMT for or induced by the project cannot be reduced consistent with the performance metrics outlined below, the City may consider approval of the project, subject to a statement of overriding considerations and mitigation of transportation impacts to the extent feasible, provided some other stated form of public objective including specific economic, legal, social, technological or other considerations is achieved by the project.

Standard MOB-3-2.a has been revised and new Standard MOB-3-2.b added to Policy MOB-3-2 on page 5.13-34, as follows:

Standard MOB-3-2.a:

~~Require new commercial development for projects equal to and greater than 100,000 square feet to provide an electric vehicle charging station and new one- and two-family dwelling units with attached private garages to residential development to be pre-wired for plug-in future installation of electric vehicles charging equipment. For new multi-family residential development, require at least 5% of required parking spaces to be EV capable, and for at least 50% of those EV-capable spaces to have necessary electric vehicle supply equipment to provide active charging stations.~~

Standard MOB-3-2.b: For new office development projects, require at least 10% of required parking spaces to be EV capable, and for at least 50% of those EV-capable spaces to have necessary electric vehicle supply equipment to provide active charging stations. For other types of non-residential development, require at least 6% of required parking spaces to be EV capable, and for at least 50% of those EV-capable spaces to have necessary electric vehicle supply equipment to provide active charging stations.

Policy MOB-4-1 on page 5.13-36 is revised as follows:

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.

6.0 OTHER CEQA CONSIDERATIONS

No changes were made to this section.

7.0 PROJECT ALTERNATIVES

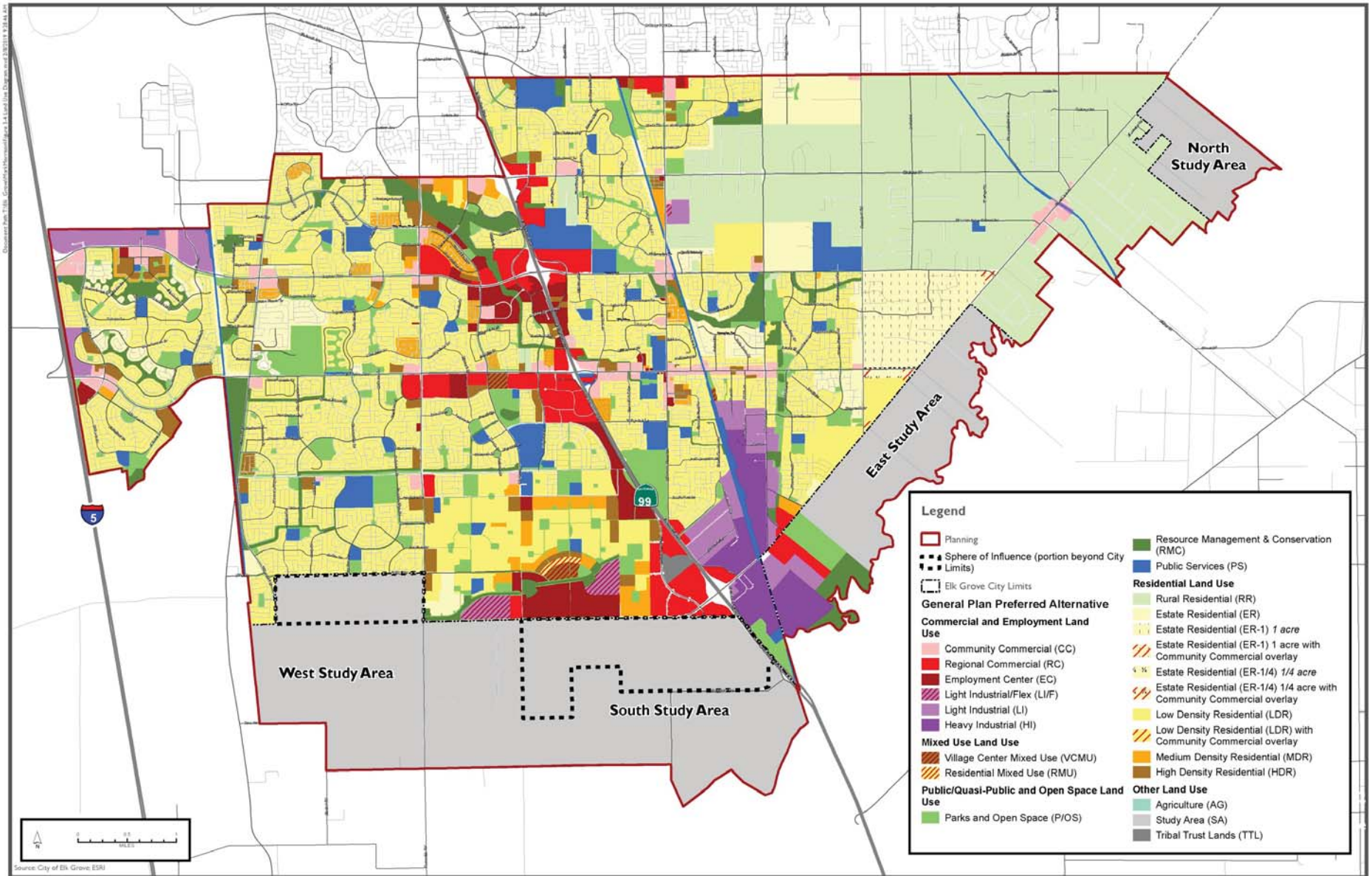
No changes were made to this section.

8.0 REPORT PREPARATION

No changes were made to this section.

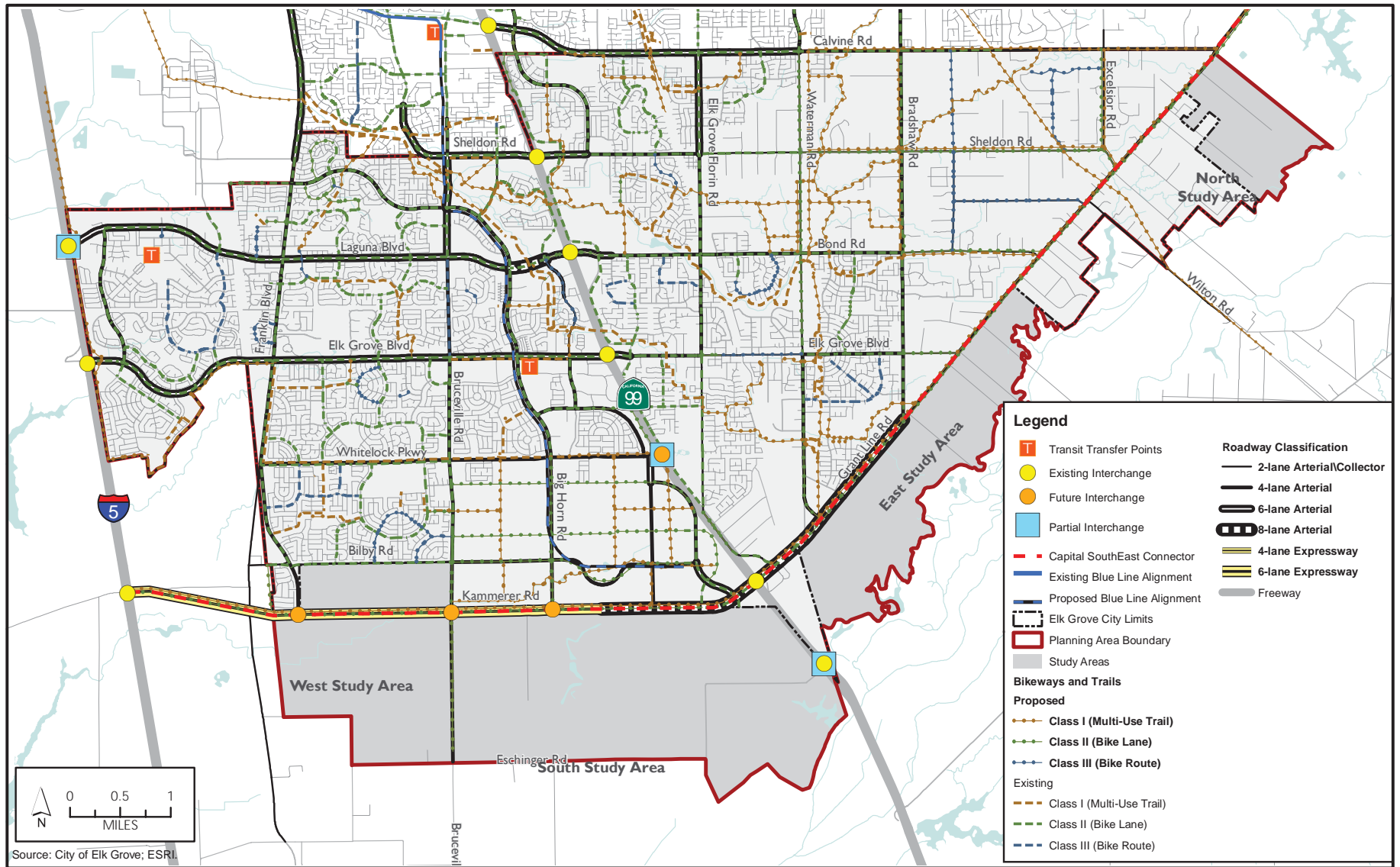
2.0 ERRATA

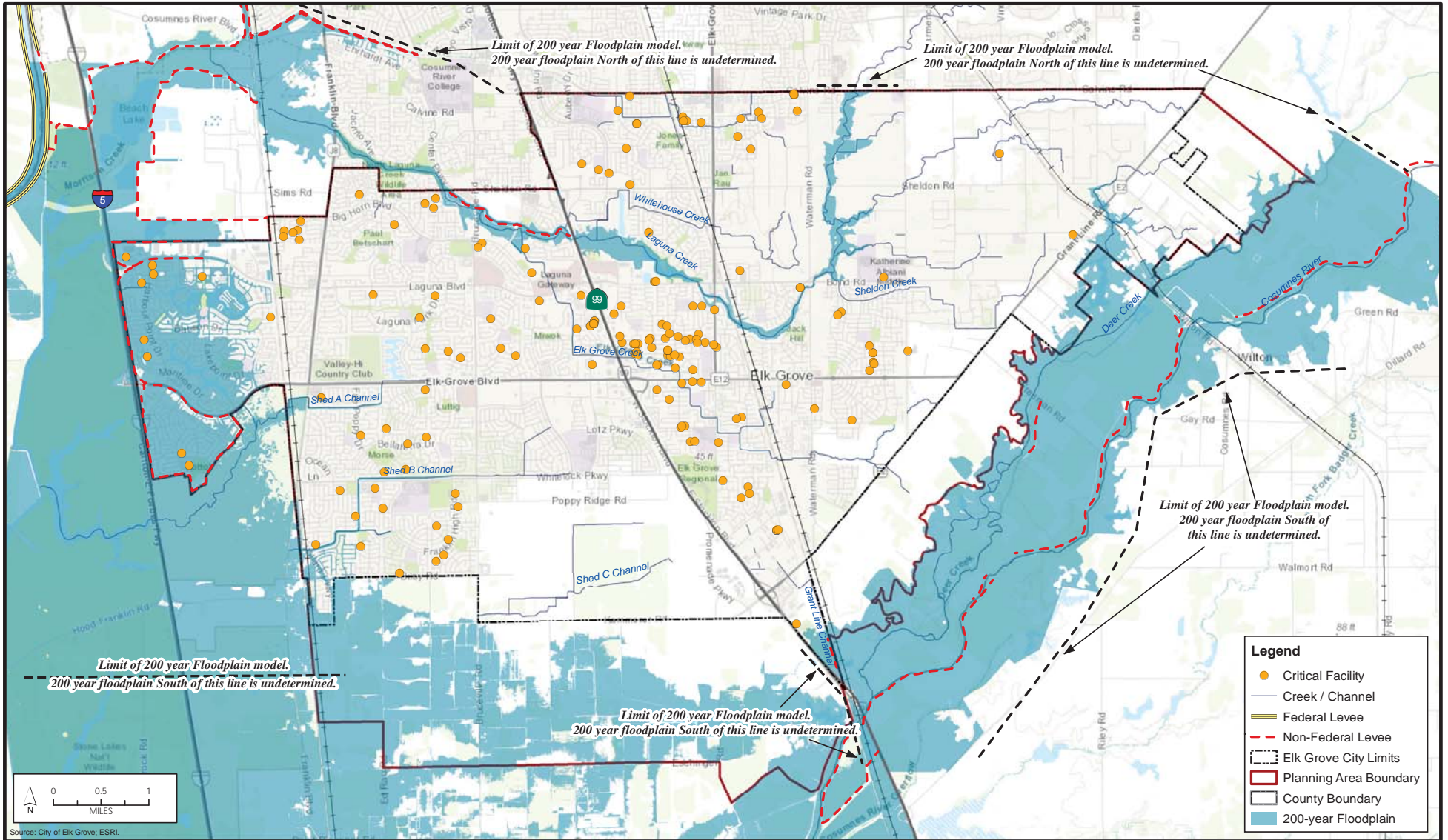
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Legend

- Planning
- Sphere of Influence (portion beyond City Limits)
- Elk Grove City Limits
- General Plan Preferred Alternative Commercial and Employment Land Use**
 - Community Commercial (CC)
 - Regional Commercial (RC)
 - Employment Center (EC)
 - Light Industrial/Flex (LI/F)
 - Light Industrial (LI)
 - Heavy Industrial (HI)
- Mixed Use Land Use**
 - Village Center Mixed Use (VCMU)
 - Residential Mixed Use (RMU)
- Public/Quasi-Public and Open Space Land Use**
 - Parks and Open Space (PIOS)
- Resource Management & Conservation (RMC)**
- Public Services (PS)**
- Residential Land Use**
 - Rural Residential (RR)
 - Estate Residential (ER)
 - Estate Residential (ER-1) 1 acre
 - Estate Residential (ER-1) 1 acre with Community Commercial overlay
 - Estate Residential (ER-1/4) 1/4 acre
 - Estate Residential (ER-1/4) 1/4 acre with Community Commercial overlay
 - Low Density Residential (LDR)
 - Low Density Residential (LDR) with Community Commercial overlay
 - Medium Density Residential (MDR)
 - High Density Residential (HDR)
- Other Land Use**
 - Agriculture (AG)
 - Study Area (SA)
 - Tribal Trust Lands (TTL)





3.0 LIST OF COMMENTERS

3.0 LIST OF AGENCIES AND PERSONS COMMENTING

3.1 LIST OF COMMENTERS

The following individuals and representatives of organizations and agencies submitted comments on the Draft EIR:

Letter	Individual or Signatory	Affiliation	Date
A	Matt Cervantes	California Public Utilities Commission	8/10/2018
B	Michael W. McLaughlin	Cosumnes Community Services District (CSD) Fire Department	9/24/2018
C	Fred Bremerman	Cosumnes CSD Parks and Recreation Department	9/26/2018
D	Kim Williams	Elk Grove Unified School District	9/26/2018
E	Tim Hawkins	Sacramento County Office of Planning and Environmental Review	9/26/2018
F	Paul Philley	Sacramento Metropolitan Air Quality Management District (SMAQMD)	9/26/2018
G	Nicole Goi	SMUD	9/25/2018
H	James Corless	Sacramento Area Council of Governments (SACOG)	9/26/2018
I	Gary S. Arnold	California Department of Transportation (Caltrans)	9/26/2018
J	Erik Vink	Delta Protection Commission	9/26/2018
1	Shirley Peters	Resident	9/20/2018
2	Lynn Wheat	Resident	9/25/2018
3	Ralph Propper Rob Burness Sean Wirth	ECOS	9/26/2018
4	Chris Tooker	Friends of Stone Lake	9/26/2018
5	Laurie Litman	350 Sacramento	9/26/2018
6	Suzanne Pecci	Resident	9/26/2018
7		DEIR Public Meeting Transcript	9/13/2018

3.0 LIST OF AGENCIES AND PERSONS COMMENTING

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4.0 COMMENTS AND RESPONSES

4.1 REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires the lead agency to evaluate all comments on environmental issues received on the Draft Environmental Impact Report (EIR) and prepare a written response. The written response must address the significant environmental issue raised and must provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by comment, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that where the response to comments results in revisions to the Draft EIR, those revisions be noted as a revision to the Draft EIR or in a separate section of the Final EIR.

4.2 COMMENTS RECEIVED AT THE PUBLIC WORKSHOP FOR THE DRAFT EIR

The City held a public workshop on the Draft EIR for the Project to solicit public comment on September 13, 2018.

4.3 RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

Public agency comment letters are coded by letters and each issue raised in the comment letter is assigned a number (e.g., Comment Letter A, comment 1: A-1).

Individual and interest group comment letters are coded by numbers and each issue raised in the comment letter is assigned a number (e.g., Comment Letter 1, comment 1: 1-1).

Where changes to the Draft EIR text result from responding to comments, those changes are included in the response and demarcated with revision marks (underline for new text, ~~strikeout~~ for deleted text). Comment-initiated text revisions to the Draft EIR and minor staff-initiated changes are also provided and are demarcated with revision marks in Section 2.0, Errata, of this Final EIR.

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013



August 10, 2018

Christopher Jordan
City of Elk Grove
8401 Laguna Palms Way
Elk Grove, CA 95758

Re: SCH **2017062058** – City of Elk Grove General Plan Update Project – *Draft Environmental Impact Report*

Dear Mr. Jordan:

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the *Draft Environmental Impact Report (Draft EIR)* for the proposed City of Elk Grove General Plan Update Project. City of Elk Grove (City) is the lead agency.

The City proposes to make improvements to its infrastructure in the general plan, including transportation infrastructure. The document indicates that a majority of crossings with the Union Pacific (UPRR) tracks along the Fresno Subdivision and the Sacramento Subdivision are at-grade. Furthermore, the General Plan Update indicates a policy to pursue funding for grade separation of highway-rail crossings when possible.

Any development adjacent to or near the railroad (ROW) should be planned with the safety of the rail corridor in mind. New developments may increase pedestrian or vehicular traffic volumes not only on streets and at intersections, but also at nearby rail crossings. Traffic impact studies should analyze rail crossing safety and potential mitigation measures. Safety improvement measures may include the planning for grade separations or improvements to existing at-grade crossings. Examples of improvements may include, but are not limited to: addition or upgrade of crossing warning devices, detectable warning surfaces and edge lines on sidewalks, and pedestrian channelization. Pedestrian and bicycle routes should be designed to clearly prohibit and discourage unauthorized access (trespassing) onto the tracks, except at authorized crossings.

A-1

In addition, modifications to existing public crossings require authorization from the Commission. RCEB representatives are available for consultation on any potential safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: <http://www.cpuc.ca.gov/crossings>.

A-2

If you have any questions, please contact Matt Cervantes at (213) 266-4716, or mci@cpuc.ca.gov.

Sincerely,

Matt Cervantes
Utilities Engineer
Rail Crossings Engineering Branch
Safety and Enforcement Division

CC: State Clearinghouse, state.clearinghouse@opr.ca.gov

Letter A – Matt Cervantes, California Public Utilities Commission (CPUC)

Response A-1:

The commenter states that traffic studies for future projects should analyze rail crossing safety and potentially include measures such as grade separations or improvements for at-grade crossings. This comment does not address the adequacy of the analysis in the Draft EIR. However, the Draft EIR acknowledges CPUC requirements pertaining to highway-rail crossings. As noted on Draft EIR page 5.13-24, the CPUC sets guidelines, implemented through general orders, for interactions between railroad facilities and ground transportation facilities, including location and type of crossing guards, design of railroad crossings, and other design criteria in and around railroad facilities. General Order NO. 75-D – *Regulations Governing Standards for Warning Devices for At-Grade Highway-Rail Crossings in the State of California*, govern the standards for warning devices for at-grade highway-rail crossings for motor vehicles, pedestrians, and/or bicycles. All warning devices must be in substantial conformance with the applicable Standards, Guidance and Options set forth in the Manual on Uniform Traffic Control Devices in the for adopted by Caltrans. Policy MOB-6-1 includes the planning and pursuit of funding for strategic grade-separated crossings of rail corridors (Draft EIR p. 5.13-61). Where future projects could result in conflicts at rail crossings, traffic studies would address automobile/ rail safety.

Response A-2:

The commenter states any modifications to existing public crossings would require CPUC approval. Comment noted. The proposed General Plan does not include any modifications to existing public crossings. No further response is required.



Letter B

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September 24, 2018

City of Elk Grove
Attn: Christopher Jordan, AICP, Director of Strategic Planning and Innovation
8401 Laguna Palms Way
Elk Grove, CA 95758
email: cjordan@elkgrovecity.org

SUBJECT: City of Elk Grove Draft General Plan Update and Environmental Impact Report

Dear Mr. Jordan:

You and your team have done an exceptional job of capturing the culture and need of the City of Elk Grove in the Draft General Plan Update. Thank you for providing us the opportunity to provide input on this important planning document.

The following comments are limited to the suggestions we have developed for the General Plan Update. Our comments on the Environmental Impact Report are attached for your use and reference.

Page 8-36

- Top paragraph, 2/3 of the way through: “Fire planning and ~~preparation~~ **prevention** activities in Elk Grove are ~~primarily undertaken~~ provided by the Cosumnes Fire Department, part of the CCSD.”

Page 8-39

- “Policy ER-6-9: **Participate in the development and** Facilitate implementation of ~~measures identified in the Metro Fire’s~~ **Cosumnes Fire Department’s** Community Wildfire Protection Plan (**CWPP**) for the protection of human life and reduction in loss of property, critical infrastructure, and natural resources associated with wildfire.”

Page 8-40

- First paragraph under the Fire and Emergency Medical Services Header: “~~Fire, rescue and emergency medical services are provided to Elk Grove through the CCSD, an independent special district. The Cosumnes Fire Department provides public information to residents about fire and injury prevention and responds to emergency~~

B-1

Letter B continued

~~calls in Elk Grove and Galt.~~ REPLACE paragraph with: **“The CCSD provides fire protection, fire prevention, and emergency medical, and rescue services to the cities of Elk Grove and Galt, as well as unincorporated areas in the region covering over 157 square miles. The CCSD Fire Department operates out of eight fire stations: six in Elk Grove area, and two in the City of Galt, and a state-of-the-art fire training facility. The fire stations are currently located in Elk Grove, East Franklin, East Elk Grove, Laguna Creek, Lakeside, the Elk Grove–West Vineyard area and Galt.”**

- Move the last paragraph on the page, which begins with “Due to the area’s...” immediately below the paragraph outlined in the bullet above. The same paragraph needs to be modified as follows: **“Due to the area’s rapid growth and subsequent increase in traffic congestion, the Cosumnes Fire Department responds to more emergency call than the State average. The established response time goal for the department is **the first unit should arrive on scene within seven minutes of receipt of the 911 call in the dispatch center, 90 percent of the time. 6 minutes or less for 90 percent of the calls in urbanized areas of the District. The response time goal for rural areas is 12 minutes or less for 90 percent of calls.**”**

Page 8-41

- **Automatic and Mutual Aid Agreements**
- Replace the first paragraph that begins with “The Cosumnes Fire Department...” with **“The CCSD is the primary fire protection and emergency medical response service within the SOIA Area. Sacramento Metropolitan Fire District (SMFD), the City of Sacramento Fire Department (SFD), and the CCSD share common jurisdictional boundaries and participate in a regional automatic/ mutual aid agreement. The CCSD Fire Department also has a mutual aid agreement with the surrounding volunteer fire districts in southern Sacramento County, including Wilton, Courtland, Walnut Grove, and Herald Fire Districts. As a result of the existing automatic and mutual aid agreements the closest unit available is dispatched to an incident and fire district boundaries are not an issue when an incident occurs.”**

Please contact me if I can provide any additional information or answer any questions you may have.

Respectfully,

Michael W. McLaughlin, CFO

Michael W. McLaughlin, CFO
Fire Chief

Attachment: 0511_PublicServices-CFD Comments

Letter B continued

This section discusses potential environmental impacts associated with public facilities and services that would serve the Planning Area. Public services include fire protection, law enforcement, schools, parks and recreation, and libraries.

5.11.1 FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES EXISTING SETTING

Cosumnes Community Services District Fire Department

Fire protection services in the Planning Area are provided by the Cosumnes Community Services District (CCSD). Services include fire suppression, [fire prevention](#), emergency medical services, technical rescue, and arson and explosion investigations in a 157-square-mile service area covering the City, Galt, and a portion of unincorporated southern Sacramento County. The service area encompasses a population of more than [202,000](#). The CCSD has 175 personnel in its Operations Division and operates out of eight fire stations with eight advanced life support (ALS) engine companies, one aerial ladder truck company, [seven](#) rescue ambulance units, and one command vehicle, as well as other specialized apparatus for specialized emergency circumstances. In [2017](#), the CCSD responded to [19,775](#) incidents, a [6.3](#) percent [increase](#) from [2016](#). The CCSD's fire stations are at the following locations:

- Fire Station 45, 229 5th Street, central Galt
- Fire Station 46, 1050 Walnut Avenue, northeast Galt
- Fire Station 71, 8760 Elk Grove Boulevard
- Fire Station 72, 10035 Atkins Drive
- Fire Station 73, 9607 Bond Road; this station provides fire and emergency medical services
- Fire Station 74, 6501 Laguna Park Drive
- Fire Station 75, 2300 Maritime Drive
- Fire Station 76, 8545 Sheldon Road

In addition, three new fire stations are planned in the Planning Area: (1) Station 77 to be located within the Laguna Ridge Specific Plan Area near [the intersection of Poppy Ridge Road and Big Horn Boulevard](#); (2) Station 78, to be located within the South Pointe Land Use Policy Area near [the intersection of Lotz Parkway and Bilby Road](#); and (3) Station 79 to be located within the Eastern Elk Grove Community Plan Area near [the intersection of Bradshw Road and Grant Line Road](#).

B-2

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Letter B continued

Wildland Fire Hazards

Wildland fire hazards in the Planning Area are limited; there are no moderate, high, or very high fire hazard severity zones identified by the California Department of Forestry and Fire Protection (Cal Fire) in or adjacent to the Planning Area. However, the Sacramento County Local Hazard Mitigation Plan Update (LHMP) indicates the probability of a wildfire is highly likely and could be extensive geographically, and that climate change may be a factor in the probability of future occurrence (Sacramento County 2016: Table ES-2). Wildland fire hazard is discussed further in Section 5.8, Hazards and Hazardous Materials.

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES REGULATORY FRAMEWORK

State

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8, Sections 1270 “Fire Prevention” and 6773 “Fire Protection and Fire Fighting Equipment,” the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California Fire Code

The California Fire Code (Fire Code) (California Code of Regulations, Title 24, Part 9) contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the Fire Code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The Fire Code also contains specialized technical regulations related to fire and life safety.

California Health and Safety Code

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code. Regulations address building standards, fire protection and notification systems, fire protection devices such as extinguishers, smoke alarms, high-rise buildings, child care facility standards, and fire suppression training, among other topics.

The Fire Protection District Law of 1987

**B-2
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Letter B continued

The Fire Protection District Law (Health & Safety Code §13800, et seq.) is the source of statutory authority for more than 380 fire protection districts. The Legislature adopted this revised statute in 1987 after a study that culminated in Senate Bill 515. Then the Chairman of the Senate Local Government Committee, State Senator Marian Bergeson, authored SB 515 which was the first complete revision of the fire district laws since 1961.

Local

Elk Grove Municipal Code Chapter 16.85 Elk Grove Fire Fee

Municipal Code Chapter 16.85 establishes a fee program to fund the cost of capital facilities, the need for which is generated by the type and level of development designated in the current General Plan (City of Elk Grove 2003). The fee program applies to both residential and nonresidential development.

Elk Grove Municipal Code Chapter 17.04 California Fire Code

Municipal Code Chapter 17.04 codifies the City's adoption of the 2016 California Fire Code in its entirety.

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES IMPACTS AND MITIGATION MEASURES

Standards of Significance

The impact analysis provided below is based on the following CEQA Guidelines Appendix G threshold of significance. A project is considered to have a significant effect on the environment if it will:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Methodology

The following impact analysis is based on a review of the proposed Land Use Diagram and General Plan policies related to fire protection and emergency medical services as well as discussions with CCSD Fire Department staff.

General Plan Policies and Standards

**B-2
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Letter B continued

The proposed General Plan contains the following policies and standards for managing future development in the City to ensure adequate public services are provided for future development.

Policy ER-4-1: Cooperate with the Cosumnes Community Services District (CCSD) Fire Department to reduce fire hazards, assist in fire suppression, and promote fire and life safety in Elk Grove.

Standard ER-4-1.a: Require, where appropriate, on-site fire suppression systems for all new commercial and industrial development to improve fire and life safety.

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Standard ER-4-1.b: Require the installation of earthquake-triggered automatic gas shut-off sensors in high-occupancy facilities and in industrial and commercial structures.

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Policy ER-4-2: Work with the CCSD to develop a fire prevention plan that lists major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard.

Policy SAF-1-3: Coordinate with the CCSD Fire Department to ensure that new station siting and resources are available to serve local needs.

Policy SAF-1-4: Expand emergency response services as needed due to community growth.

**B-2
cont.**

Project Impacts and Mitigation Measures

Fire Protection and Emergency Medical Services

Impact 5.11.1.1: Implementation of the proposed Project would increase demand for fire prevention, fire protection and emergency medical services, which could trigger the need for additional fire stations, the construction of which could result in impacts on the physical environment. This impact would be less than significant.

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Implementation of the proposed Project in accordance with the proposed Land Use Diagram would result in new development and associated population growth, which would increase demand for fire prevention, fire protection and emergency medical services, thus requiring

Letter B continued

additional [fire inspectors](#), firefighters, paramedics, and other personnel. This increase in population is discussed in Section 3.0, Demographics, and the environmental impacts associated with the population increase are addressed throughout the technical sections (Sections 5.1 through 5.13) of this EIR.

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Developed areas of the Planning Area are adequately served by the CCSD's existing fire stations and substantial new growth is not anticipated in these areas under the proposed Project. Where new growth areas within the City have been identified, new fire stations are planned to accommodate the anticipated growth. Because the timing of development that would occur in the Planning Area is not yet known, the physical impacts of construction of these facilities cannot be evaluated at this time.

Existing Regulations and Standards and Proposed General Policies That Provide Mitigation

Prior to development in the Study Areas, the City will require preparation of specific plans or other master planning, which would identify sites and funding sources for future stations determined necessary to meet anticipated demand. CEQA review of project-level impacts of future community plans would also be [required and](#) would evaluate the environmental effects of any new facilities. Proposed General Plan Policies ER-4-1 and ER-4-2 are intended to reduce fire risk in the Planning Area by encouraging cooperation between the City and the CCSD as well as development of a fire prevention plan. Policies SAF-1-3 and SAF-1-4 call for coordination with the CCSD Fire Department to ensure that new station siting and resources are available to serve local needs and emergency response services are expanded as needed due to community growth.

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The CCSD Fire Department receives its funding through property taxes, [development impact fees](#), fees for service, and grant funding and, therefore, fund expanded services as new development occurs. Pursuant to Municipal Code Chapter 16.85, Elk Grove Fire Fee, all new development projects would be required to pay fire protection development fees to fund additional facilities and equipment. These funds would help to pay for costs associated with the development of new fire stations, if needed, including any required environmental analysis.

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Conclusion

Buildout of the Planning Area in accordance with the proposed Project would increase the number of residents and jobs in the City, which would increase demand for [fire prevention](#), fire protection and emergency medical services. Compliance with applicable regulations and proposed General Plan policies would ensure new fire station siting and resources are available and that required environmental review would be conducted as specific fire protection facilities are proposed. Impacts associated with the construction of needed fire protection facilities would not exceed construction impacts disclosed in the technical sections of this EIR. Therefore, impacts related to the provision of fire services would be less than significant.

Mitigation Measures

**B-2
cont.**

Letter B continued

No additional mitigation required beyond compliance with existing regulations and proposed General Plan policies.

General Plan Update Draft Environmental Impact Report

City of Elk Grove July 2018

5.11-4 5.11 PUBLIC SERVICES AND RECREATION

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

Cumulative Setting

The cumulative setting for fire and emergency medical services includes all approved, proposed, and reasonably foreseeable development projects in the service area of the CCSD Fire Department.

Cumulative Impacts and Mitigation Measures

Cumulative Impacts to Fire Protection and Emergency Medical Services

Impact 5.11.1.2

Implementation of the proposed Project, in combination with other development within the CCSD's service area, would increase demand for [fire prevention](#), fire protection and emergency medical services. **This impact would be less than cumulatively considerable.**

With adoption and implementation of the Project, proposed, approved, and reasonably foreseeable development in the CCSD service area would increase the demand for fire protection and emergency medical services, which would result in the need for new fire protection facilities, the construction of which could result in physical environmental effects. This is a potentially significant cumulative impact.

Funding from property taxes, development impact fees, and other sources of funding would provide sufficient resources to expand the department's staff, equipment, and facilities to accommodate future growth within the CCSD service area. In addition, as described previously, the City requires preparation of community plans prior to development in the Study Areas, which would determine the need for new stations and, if necessary, identify sites and funding sources. Further CEQA review of project-level impacts would be required prior to development of any new facilities. Implementation of applicable regulations and policies contained in the proposed Project would ensure further environmental review would be conducted as specific

**B-2
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Letter B continued

facilities are proposed, which would reduce the proposed Project's contribution to this impact to less than cumulatively considerable.

Mitigation Measures

No additional mitigation required beyond compliance with existing regulations and proposed General Plan policies.

**B-2
cont.**

Letter B – Michael W. McLaughlin, Cosumnes Community Services District Fire Department

Response B-1:

The commenter suggests changes to the General Plan text, some of which appears in the Draft EIR. See Section 2.0, Errata in this Final EIR. None of the recommended changes affect the adequacy of the analysis in the Draft EIR pertaining to the determination whether additional fire protection facility space is required. The Draft EIR does not assume the specific locations of fire facilities, but programmatically evaluates for construction impacts in the Planning Area. Therefore, whether fire stations are constructed based on the need for a 6-minute, 7-minute, or 12-minute response time, the physical impacts of the development of fire stations would not differ from that disclosed in the EIR.

Response B-2:

The commenter has recommended several changes to the text in subsection 5.11.1, Fire Protection and Emergency Medical Services, in the Draft EIR. The requested changes include updated information and minor editorial revisions that do not affect the conclusions of the Draft EIR.

The following change is made to the Draft EIR on page 5.11-1 in the first paragraph under the “Cosumnes Community Services District Fire Department” subheading to reflect 2017 data:

Fire protection services in the Planning Area are provided by the Cosumnes Community Services District (CCSD). Services include fire suppression, fire prevention, emergency medical services, technical rescue, and arson and explosion investigations in a 157-square-mile service area covering the City, Galt, and a portion of unincorporated southern Sacramento County. The service area encompasses a population of more than 202,000~~185,000~~. The CCSD has 175 personnel in its Operations Division and operates out of eight fire stations with eight advanced life support (ALS) engine companies, one aerial ladder truck company, six~~seven~~ rescue ambulance units, and one command vehicle, as well as other specialized apparatus for specialized emergency circumstances (CCSD 2017a). In 2017~~2016~~, the CCSD responded to 18,592 19,775 incidents, an 8.2~~6.3~~ percent decrease increase from 2016~~2015~~. The CCSD’s fire stations are at the following locations:

The following change is made to the Draft EIR on page 5.11-1 in the paragraph following the bulleted items:

In addition, three new fire stations are planned in the Planning Area: (1) Station 77 to be located within the Laguna Ridge Specific Plan Area near the intersection of Poppy Ridge Road and Big Horn Boulevard ~~Whitelock Parkway~~; (2) Station 78, to be located within the South Pointe Land Use Policy Area near the intersection of Lotz Parkway and Bilby Road ~~Kammerer Road~~; and (3) Station 79 to be located within the Eastern Elk Grove Community Plan Area near the intersection of Bradshaw Road and Grant Line Road.

The following change is made to the Draft EIR on page 5.11-2 under the “Uniform Fire Code” subheading:

4.0 COMMENTS AND RESPONSES

California Uniform Fire Code

The California Uniform Fire Code (Fire Code) (California Code of Regulations, Title 24, Part 9) contains regulations relating to construction, maintenance, and use of buildings.

The following text is added to the State regulatory setting portion of the Draft EIR on page 5.11-2 following the discussion of the California Health and Safety Code:

Fire Protection District Law of 1987

The Fire Protection District Law (Health & Safety Code §13800, et seq.) is the source of statutory authority for more than 380 fire protection districts. The Legislature adopted this revised statute in 1987 after a study that culminated in Senate Bill 515. Then the Chairman of the Senate Local Government Committee, State Senator Marian Bergeson, authored SB 515, which was the first complete revision of the fire district laws since 1961. These edits do not change the conclusions of the EIR. No further response is required.

The following change is made to the policies on Draft EIR page 5.11-3:

Policy ER-4-1: Cooperate with the Cosumnes Community Services District (CCSD) Fire Department to reduce fire hazards, assist in fire suppression, and promote fire and life safety in Elk Grove.

Standard ER-4-1.a: Require, where appropriate, on-site fire suppression systems for all new commercial and industrial development to ~~reduce the dependence on fire department equipment and personnel~~ improve fire and life safety.

The following change is made to the impact statement and the first sentence of the paragraph immediately following on pages 5.11-3 and 5.11-4:

Impact 5.11.1.1 Implementation of the proposed Project would increase demand for fire prevention, fire protection, and emergency medical services, which could trigger the need for additional fire stations, the construction of which could result in impacts on the physical environment. This impact would be **less than significant**.

Implementation of the proposed Project in accordance with the proposed Land Use Diagram would result in new development and associated population growth, which would increase demand for fire prevention, fire protection, and emergency medical services, thus requiring additional fire inspectors, firefighters, paramedics, and other personnel. This increase in population is discussed in Section 3.0, Demographics, and the environmental impacts associated with the population increase are addressed throughout the technical sections (Sections 5.1 through 5.13) of this EIR.

The following change is made to the first sentence of the second paragraph under the "Existing Regulations and Standards and Proposed General Plan Policies That Provide Mitigation" subheading on page 5.11-4.

The CCSD Fire Department receives its funding through property taxes, development impact fees, fees for service, and grant funding and can, therefore, fund expanded services as new development occurs. Pursuant to Municipal Code Chapter 16.85, Elk

Grove Fire Fee, all new development projects would be required to pay fire protection development fees to fund additional facilities and equipment. These funds would help to pay for costs associated with the development of new fire stations, if needed, including any required environmental analysis.

The following change is made to the first sentence in the paragraph under the "Conclusion" subheading on page 5.11-4:

Conclusion

Buildout of the Planning Area in accordance with the proposed Project would increase the number of residents and jobs in the City, which would increase demand for fire prevention, fire protection, and emergency medical services.

The following change is made to the impact statement 5.11.1.2 and the first sentence of the paragraph immediately following on page 5.11-5:

Impact 5.11.1.2 Implementation of the proposed Project, in combination with other development within the CCSD's service area, would increase demand for fire prevention, fire protection, and emergency medical services. This impact would be **less than cumulatively considerable**.

With adoption and implementation of the Project, proposed, approved, and reasonably foreseeable development in the CCSD service area would increase the demand for fire prevention, fire protection, and emergency medical services, which would result in the need for new fire protection facilities, the construction of which could result in physical environmental effects. This is a potentially significant cumulative impact.



Letter C

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September 26, 2018

City of Elk Grove
Attn: Christopher Jordan, AICP, Director Strategic Planning and Innovation
8401 Laguna Palms Way
Elk Grove, CA 95758

RE: Draft Environmental Impact Report for City of Elk Grove General Plan Update

Dear Mr. Jordan,

The Cosumnes Community Services District (CSD) is pleased to provide comments on the Draft Environmental Impact Report (DEIR) for the Elk Grove General Plan Update, dated July 2018. The comments below address parks, trails, open space, and recreation items in the DEIR.

- 1) Project Objectives (Pg.2.0-2) – The CSD supports the objectives which address parks and recreation items including:
 - a) Objective 1) Provide for growth of the City to meet long-term needs, including... recreational opportunities.
 - b) Objective 3) An improved transportation system including walking and biking options.
 - c) Objective 4) Protect open space, providing trails, parkland, and a range of recreational opportunities.
- 2) Vision Principle - Sustainable and Healthy Community – Clean, Green Practices & Healthy Living (Pg. 2.0-9) – The City’s “healthy living” vision principle is consistent with the vision statement developed as part of the 2018 CSD Parks and Recreation Master Plan: *An inclusive and connected park, recreation, and trails system that delivers opportunities for health and wellness, social interaction, and delight to the Elk Grove community.* The CSD envisions working cooperatively with the City to make the healthy living vision a reality.
- 3) 5.11.4 Parks and Recreation (Pg. 5.11-14 to 5.11-23)
 - a) CSD Overview (P.5.11-14 to 5.11-15) – The first sentence at the bottom of Pg. 5.11-14 should be updated with the underlined text: The CCSD provides parks and recreation services to the City and in the CCSD boundaries through its Parks and Recreation Department.

C-1

C-2

C-3

The information in this section correctly notes the CSD provides parks and recreation services in the community, the CSD plans and designs new parks, the City and the CSD joint goal of 5 acres active parkland per 1,000 residents, the CSD provision of recreation services for all ages, and the City-CSD Memorandum of Understanding for park and recreation facilities addressing funding, programming, construction, ownership, and maintenance in the City limits.

C-4

- i) Park Descriptions and Park Design Principles (Pg.5.11-15 to 5.11-17) – The 2018 CSD Parks and Recreation Master Plan was approved by the CSD Board on August 15, 2018. Among many things, the Master Plan includes updated Park Design Principles (PDP). The PDP were developed with City input and then reviewed by City staff to ensure the PDP meet the needs of both agencies. The PDP are ready for consideration and adoption as part of the City General Plan Update.

Letter C continued

The “Regional Park” category (P.5.11-16) has been removed from the updated PDP. This category is not used in the CSD park system. If a Regional Park was proposed in the future, criteria would be developed using input from all involved entities.

C-5

- b) Parks and Recreation Master Plan (Pg.5.11-19) – The DEIR correctly notes:
 - i) The Master Plan is a joint document prepared and approved by the CSD and the City.
 - ii) The Master Plan was developed to guide both agencies in providing parks and recreation opportunities.
 - iii) The Master Plan establishes clear direction for the CSD’s core services and responsibilities. The CSD Master Plan included input from 2,275 people, ensuring that CSD direction for parks and recreation will match needs and desires of the community.

- c) General Plan Policies and Standards (Pg.5.11-20 to 5.11-21) – The overall direction of policies is consistent the 2018 CSD Parks and Recreation Master Plan. The importance and value of joint coordination between the City and CSD is recognized through specific phrases: “Work in conjunction with the CSD”, “Work with the CSD”, and “Coordinate with the CSD.”

C-6

C-7

The CSD requests removal of Policy PT-1-8 (P.5.11-20), which dates back to the 2003 City General Plan. The CSD does not think this policy applicable in light of other listed policies and the City-CSD MOU.

C-8

Thank you for the opportunity to review and comment on the DEIR.

Sincerely,



Fred Bremerman
Project Manager

4.0 COMMENTS AND RESPONSES

Letter C – Fred Bremerman, Cosumnes CSD Parks

Response C-1:

The commenter expresses support for the project objectives related to parks and recreation. This comment does not address the adequacy of the Draft EIR. Comment noted.

Response C-2:

The commenter notes the CSD envisions working cooperatively with the City in support of the City's "healthy living" visions principle. This comment does not address the adequacy of the Draft EIR. Comment noted.

Response C-3:

The commenter suggests a text revision for the Draft EIR. The first sentence at the bottom of page 5.11-14 is modified as follows:

The CCSD provides parks and recreation services to the City and in the CCSD boundaries through its Parks and Recreation Department.

This does not change the conclusions of the EIR. No further response is required.

Response C-4:

The commenter notes that the CSD Board approved the 2018 CSD Parks and Recreation Master Plan on August 15, 2018. Therefore, the text in the first sentence in the second paragraph under subheading "Park Descriptions and Park Design Principles" on Draft EIR page 5.11-15 is amended as follows:

The CCSD ~~is preparing~~ approved an update to the Parks and Recreation Master Plan on August 15, 2018.

This does not change the conclusions of the EIR. No further response is required.

Response C-5:

The commenter states that the "Regional Park" category has been removed from the updated PDP. The following text is removed from Draft EIR page 5.11-16:

Regional Park

~~Regional parks serve a large area of several communities, residents within a city or county, or across multiple counties. Depending on activities within a regional park, users may travel as many as 60 miles for a visit. Regional parks include recreational opportunities such as soccer, softball, golf, boating, camping, conservation wildlife viewing, and fishing. Although regional parks usually have a combination of passive areas and active facilities, they are likely to be predominantly natural resource based parks.~~

~~Regional parks are commonly 100 to 1,000 acres, but some can be 2,000 to 5,000 acres in size. A regional park focuses on activities and natural features not included in most types~~

~~of parks and are often based on a specific scenic or recreational opportunity. Facilities could include those found in a community park as well as specialized amenities such as an art center, amphitheater, boating facility, golf course, or natural area with interpretive trails. Regional parks can and should promote tourism and economic development, as they can enhance the economic vitality and identity of the entire region.~~

This does not change the conclusions of the EIR. No further response is required.

Response C-6:

The commenter concurs with the discussion of the Parks and Recreation Master Plan on Draft EIR page 5.11-19. Comment noted.

Response C-7:

The commenter concurs with the statements regarding joint coordination between the City and CSD on pages 5.11-20 and 5.11-21. Comment noted.

Response C-8:

The CSD requests removal of Policy PT-1-8 (DEIR p. 5.11-20). Based upon subsequent discussions with the CSD, policy PT-1-8 has been revised to read as follows:

~~Policy PT-1-8: Encourage the CCSD to develop self-supporting recreation programs for those activities that go beyond basic recreation needs. Examples include outdoor and indoor swimming lessons or sports teams, and classes (such as a preschool or day care facility) or reading groups at community centers. The City may also develop and operate such programs independently. To the extent appropriate and mutually agreed, partner with the CCSD on programs and activities that benefit residents and/or improve services.~~



Members of the Board:

Beth Albiani
Nancy Chaires Espinoza
Carmine S. Forcina
Chet Madison, Sr.
Dr. Crystal Martinez-Alire
Anthony "Tony" Perez
Bobbie Singh-Allen

Letter D

Susan Bell
Chief Facilities Officer
Facilities and Planning

Robert L. Trigg Education Center
9510 Elk Grove-Florin Road, Elk Grove, CA 95624

(916) 686-7711
FAX: (916) 686-7754

September 26, 2018

Christopher Jordan, Director of Strategic Planning and Innovation
City of Elk Grove
8401 Laguna Palms Way
Elk Grove, CA 95758

SUBJECT: Comments on the City of Elk Grove General Plan Update – Draft Environmental Impact Report

Dear Mr. Jordan:

Elk Grove Unified School District (EGUSD) appreciates the opportunity to review and comment on the General Plan Update Draft Environmental Impact Report (DEIR). EGUSD requests that the following comments be considered and included in the Final Environmental Impact Report.

Requested Correction on Page 5.11-10

Please correct the text of the paragraph below as shown.

Elk Grove Unified School District Funding

*EGUSD operations are primarily funded through local property tax revenue that is first accrued in a common statewide pool, and then allocated to each school district based on average daily attendance. State law also permits the charging of development fees to assist the EGUSD in funding capital acquisition and improvements to programs for school facilities, based on documented justification that residential and nonresidential development projects generate students. The EGUSD allows the imposition of fees that can be adjusted periodically, consistent with SB 50. Developer fees, adopted by the Board of Education on ~~May 16, 2017, are \$5.43~~ **May 1, 2018 are \$5.65** per square foot of residential space and \$0.56 per square foot of commercial/industrial space. **The EGUSD also collects a Mello-Roos tax on every land parcel within EGUSD, with the taxes applied at various stages during project review and development. Additionally, in 2016 the voters approved a General Obligation bond measure that resulted in the assessment of an ad valorem property tax.***

D-1

General Comments on Pages 5.11-10 to 5.11-14

A comment letter that EGUSD submitted on July 24, 2017 in response to the Notice of Preparation for this DEIR was referenced in Table 1.0-1 on page 1.0-7. The table summarized the District's comments and states that these comments were addressed in Section 5.11 of the DEIR. However, some of the impacts and concerns listed in that letter were not addressed in the document.

D-2

Letter D continued

EGUSD appreciates that the DEIR acknowledges that implementation of this project would generate thousands of new students and could contribute to school overcrowding. We do not agree that the payment of school impact fees fully or completely mitigates the project's impact.

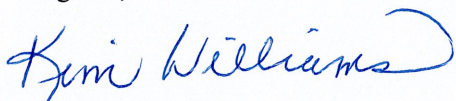
Assuming school facilities funding could be secured under the current State facilities funding mechanism, EGUSD concurs with the conclusion in the Schools section of the DEIR that there will be opportunities to mitigate the impact of students generated from new housing in the Planning areas. As development occurs, EGUSD planning staff will work with City staff and developers to identify and locate within land use plans the appropriate number of future school sites. It should also be noted that funding applications already submitted to the State building program exceed the State's authorized bonding capacity, and as of September 2018, EGUSD is still waiting for reimbursement by the State of over \$50 million for 2015 and 2016 school construction projects.

Unfortunately, the same opportunities for mitigation do not exist with infill development. Rezoning infill parcels to increase residential density will generate many unanticipated students without providing the opportunity to mitigate the impact with additional schools.

The proposed project will result in a significant regional and cumulative impact to our students and educational facilities. The fact that EGUSD will collect school impact fees on any new infill housing projects in the "Opportunity Areas" will not completely mitigate this impact. Building new schools or expanding existing facilities in these otherwise built-out neighborhoods is not feasible, and therefore should not be considered a mitigation measure for this impact.

EGUSD appreciates the City's consideration of the comments in this letter.

Regards,



Kim Williams
Planning Manager

**D-2
cont.**

Letter D – Kim Williams, Elk Grove Unified School District

Response D-1:

The commenter notes the updated developer fees. The 2017 fees noted in the Draft EIR were the most recent available during EIR preparation. While the fees for 2018 differ from those reported in the Draft EIR, the updated fees do not change the conclusions of the EIR. The paragraph under the heading "Elk Grove Unified School District Funding" on page 5.11-10 is modified as follows:

EGUSD operations are primarily funded through local property tax revenue that is first accrued in a common statewide pool, and then allocated to each school district based on average daily attendance. State law also permits the charging of development fees to assist the EGUSD in funding capital acquisition and improvements to programs for school facilities, based on documented justification that residential and nonresidential development projects generate students. The EGUSD allows the imposition of fees that can be adjusted periodically, consistent with SB 50. Developer fees, adopted by the Board of Education on May 1, ~~2018~~ ~~16, 2017~~, are ~~\$5.43~~ ~~\$5.65~~ per square foot of residential space and \$0.56 per square foot of commercial/industrial space. The EGUSD also collects a Mello-Roos tax on every land parcel within EGUSD, with the taxes applied at various stages during project review and development. Additionally, in 2016, the voters approved a General Obligation bond measure that resulted in the assessment of an ad valorem property tax.

Response D-2:

The commenter states all the comments from the District's letter on the Notice of Preparation (NOP) were not addressed. The District's NOP comment letter, which was included in Appendix A in the Draft EIR, stated that rezoning of infill sites would result in challenges to provide space at existing schools, noting that Opportunity Sites 2 and 3 would result in a significant cumulative impact on existing facilities. The District recommended that until actual development plans are presented for Opportunity Sites 2 and 3, it seems prudent to plan for the maximum number of dwelling units identified by City staff because additional students could trigger the need for additional schools. The District also advised that it would be necessary for District staff to work in concert with City staff and developers to identify school sites to serve future planned communities.

Impacts on school facilities were evaluated in the Draft EIR in Impact 5.11.3.1 in Section 5.11, Public Services and Recreation. The Draft EIR projected that future development could generate over 28,000 school-aged children, that school capacities could be exceeded, and that new or expanded school facilities would be required. Contrary to the commenter's assertion, the Draft EIR does not include any mitigation measures to build new schools or expand facilities. Rather, it states that Policy CIF-4-2 requires specific plans and other land use master plans to identify future school sites and propose guidance for incorporating new schools into overall neighborhood design. Further, as noted in the Draft EIR on page 5.11-13, pursuant to California Government Code Section 65995(h), payment of fees is deemed to be mitigation of the impacts related to school impacts as it pertains to providing facility space. Issues pertaining to funding are not within the purview of CEQA, but the Draft EIR is required to disclose if there would be environmental impacts resulting from the provision of new or expanded school facility space. The Draft EIR has complied with this requirement, providing a general analysis of environmental impacts on page 5.11-13, concluding that impacts from school construction would result in significant and unavoidable environmental impacts under existing plus project and cumulative

conditions because the mitigation measures identified in the Draft EIR to reduce or avoid environmental impacts would not be within the City's authority to implement.

Office of Planning and
Environmental Review
Leighann Moffitt, Director



Letter E

County Executive
Navdeep S. Gill

City of Elk Grove
Attn: Christopher Jordan, AICP, Director Strategic Planning and Innovation
8401 Laguna Palms Way
Elk Grove, CA 95758
cjordan@elkgrovecity.org

September 26, 2018

Subject: City of Elk Grove – General Plan Update Draft Environmental Impact Report

Attached are the comments from the Sacramento County Department of Transportation in response to the Notice of Availability of a Draft Environmental Impact Report for the Elk Grove General Plan Update Draft Environmental Impact Report. Sacramento County and its respective departments appreciate the opportunity to participate in providing comments for the Elk Grove General Plan Update and the Draft Environmental Impact Report.

Sincerely,


Tim Hawkins
Environmental Coordinator

Letter E continued

COUNTY OF SACRAMENTO *Inter-Department Correspondence*

September 17, 2018

TO: Kurtis Steinert
Office of Planning and Environmental Review

FROM: Matthew Darrow 
Department of Transportation

SUBJECT: CITY OF ELK GROVE – GENERAL PLAN UPDATE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

The Department of Transportation appreciates to opportunity to review the various documents associated with the City of Elk Grove General Plan Update DEIR. We'd like to offer the following comments that we understand will be incorporated into one countywide letter and sent to the City of Elk Grove.

- 1. Transportation Analysis Guidelines, Figure 4** – Several of the roadways shown on this figure appear to indicate roadway classifications different than those identified on the Sacramento County General Plan. Does the City plan to change classifications on these roads with this update? For example, Bradshaw Road is identified as a 6 lane thoroughfare in the County and through the City. This plan shows a 4 lane facility. Calvine Road east of Waterman Road is identified as a 6 lane thoroughfare in the current County General Plan. This update shows it as a 4 lane facility. Elk Grove Florin Road is shown as a 6 lane thoroughfare between Sheldon and Bond on the County General Plan. This update shows a 4 lane facility. Elk Grove Boulevard east of Waterman shows something different on the County General Plan as opposed to what this plan shows. Also, there doesn't seem to be any indication of the Connector JPA expressway identified along Grant Line Road. It seems like the Connector should be identified on the City General Plan.
- 2. City of Elk Grove General Plan Update DEIR July 2018 FINAL, Figure 5.13-10** – See comment 1.
- 3. City of Elk Grove General Plan Update DEIR July 2018 FINAL, Figure 5.13-13** – Many of the roads mentioned in comments 1 and 2 don't operate at acceptable levels of service. Does the City plan to "downgrade" these roads even though this is the case?
- 4. Elk Grove General Plan Public Review Draft FINAL 07.25.18, Figures 3-6 and 3-7** - See comments 1 and 2.
- 5. General** – If the City is planning to "downgrade" the various roads mentioned in comment 1 there will be potential for negative traffic impacts, including degradation of levels of service

E-1

Letter E continued

Kurtis Steinert
September 17, 2018
Page 2 of 2

and increased queuing and congestion, as the roads transition from wider to narrower widths at the City and County interface. Please identify those locations and coordinate mitigation measures with the County where county facilities are affected.

**E-1
cont.**

If you have any questions, please call me at 874-6291.

MGD

Cc: Ron Vicari - DOT
Dan Shoeman - DOT
Dean Blank - DOT

Letter E – Tim Hawkins, Sacramento County

Response E-1:

The commenter identifies several roadways in the City of Elk Grove that are shown as having roadway classifications (i.e., the number travel lanes) that are different from the roadway classifications in the Sacramento County General Plan, and states that the changes would result in negative traffic impacts. The roadways identified in the comment, which are shown in Figure 5.13-10 in the Draft EIR, include the following:

Roadway	Roadway Classification (Travel Lanes)	
	Sacramento County General Plan	City of Elk Grove General Plan Update
Bradshaw Road	6	4
Calvine Road (East of Waterman Road)	6	4
Elk Grove Florin Road (Sheldon Road to Bond Road)	6	4
Elk Grove Boulevard (Waterman Road to Bradshaw Road)	2	4
Elk Grove Boulevard (Bradshaw Road to Grant Line Road)	4	2

The effects of these changes on intersection levels of service were evaluated in Impact 5.13.1 beginning on page 5.13-38 in Section 5.13, Transportation, in the Draft EIR. The location of potential impacted locations at the City/County interface are shown on Draft EIR Figures 5.13-11 and 5.13-12. Figure 5.13-13 shows roadway segment LOS with General Plan Update buildout. The Draft EIR concluded there would be unmitigable impacts. Other than a general comment, the commenter did not provide any technical analysis that contradicts the conclusions of the Draft EIR or identifies a new impact.

With the General Plan Update, the City intends to change the roadway classifications and reduce the number of travel lanes on the roadways identified above. These changes are being made in recognition that the facilities will operate at reduced levels of service at buildout of the General Plan. However, the changes in the transportation system will help the City better balance the preservation of the City's rural character, which is described in Chapter 4 (*Urban and Rural Development*), support the development of complete streets that provide for the mobility of all users (Policy MOB-3-1 and MOB-3-2), and support Policy MOB-1-1 in striving to achieve State-mandated reductions in VMT. In addition, Policy MOB-7-2 identifies that the City will coordinate and participate with the City of Sacramento, Sacramento County, Capital SouthEast Connector Joint Powers Authority, and Caltrans on roadway improvements that are shared by jurisdictions in order to improve operations, which may include joint transportation planning efforts, roadway construction, and funding. Consistent with Policy MOB-7-2, the City will coordinate with the County at those locations that may be impacted by development in the City at the City/County interface. However, the timing and magnitude of potential impacts will depend on the rate and location of growth in the City and County.

Letter F

September 26, 2018

SENT VIA EMAIL

Mr. Christopher Jordan, AICP – Director of Strategic Planning & Innovation
City of Elk Grove
8401 Laguna Palms Way
Elk Grove, CA 95758

RE: City of Elk Grove General Plan 2018 Update

Dear Mr. Jordan:

Thank you for providing an opportunity for the Sacramento Metropolitan Air Quality Management District (SMAQMD) to review and comment on the City of Elk Grove's (City) Draft General Plan 2018 Update, including the accompanying Environmental Impact Report (DEIR), Transportation Analysis (TA) Guidelines and Climate Action Plan (CAP) 2018 Update. Overall, the City has prepared a comprehensive and user-friendly General Plan that residents and agency partners can easily understand. We appreciate the inclusion of numerous policies supporting sustainable modes of transportation, mixes of land uses and residential densities, and conservation efforts that aid in air quality and climate change improvements.

F-1

The SMAQMD is required to represent the citizens within Sacramento County in influencing the decisions of other agencies whose actions may have an adverse impact on air quality.¹ We review and provide comments through the lead agency planning, environmental and entitlement processes with the goal of reducing adverse air quality impacts and ensuring compliance with the California Environmental Quality Act (CEQA). In that spirit, our staff is providing comments to clarify and strengthen the City's General Plan, DEIR, TA Guidelines and CAP.

General Plan Policy Document Comments

1. We recommend that a reference to our State Implementation Plan (SIP) be included with the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) in **Policy LU-3-26, Criteria 4**.
2. We appreciate policies, such as **MOB-3-10, MOB-3-11 and MOB-4-3** that prioritize the safety of the most vulnerable user first in the design and planning of roadways. Policies that prioritize pedestrian and bicyclist safety support reducing the use of single-occupancy vehicles which reduces vehicle miles traveled (VMT). Additionally, we appreciate the narrative connecting the environment, human health and accessible transportation options for **Goal MOB-4 Active Transportation for All**.
3. **Standard MOB-3-2.a** requires installation of electric vehicle charging stations for new commercial development projects equal to and greater than 100,000 square feet. We strongly recommend the City expand the standard to require EV charging stations at all

F-2

¹ California Health and Safety Code §40961
https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=26.&title=&part=3.&chapter=11.&article=2.

Letter F continued

multi-family residential development projects, consistent with language included in **Implementation Measure 1.1** and further supporting CAP Measure **TACM-9 Install EV Charging Stations**.

4. We recommend rephrasing **Policy MOB-4-2** to be consistent with **CAP Measure TACM-4**, which includes bicycle support facilities (e.g., lockers, shower rooms).

5. In support of **Policies LU-3-2, LU-3-4, MOB-5-1, NR-4-6** and others related to transit service, we encourage the City to amend the zoning code (as part of **Implementation Measure 1.1**) to prohibit land use types within ¼ mile of a major transit station that are not transit supportive. Providing a clear zoning code on land use types that are supportive and prohibited near transit stations also facilitates implementation of **CAP Measure TACM-2, Transit-Oriented Development**.

6. We recommend the design guidelines and mitigation measures for the Capital SouthEast Connector also be referenced in **Policy MOB-7-6**.

7. We recommend rephrasing **Policy NR-2-4** to be consistent with **CAP Measure BE-9 Increase City Tree Planting**, which sets an average annual tree planting goal of 700 trees Citywide with assistance from the Sacramento Tree Foundation or similar organizations. Also consider developing an urban forestry master plan that outlines optimal plantings for urban and non-urbanized areas.

8. **Policy NR-4-2** replaces *former policy CAQ-26* and its action items; however, we encourage the City to require a provision that provides preference in the City's requests for proposals to contractors and vendors that use zero-emission vehicles and technologies, where appropriate.

9. We appreciate the comprehensive discussion of construction-related criteria air pollutants, SMAQMD emission thresholds and the off-site mitigation fee program in **Policy NR-4-8**.

10. In addition to the reference to the California Air Resources Board (CARB) guidance, we request the City add a general reference to the most recent version of SMAQMD's Guide to Air Quality Assessment in Sacramento County and the SMAQMD's Mobile Sources Air Toxics (MSAT) Protocol² to **Policy NR-4-9**. We recognize the MSAT Protocol was not available until recently, but it contains exposure reduction measures that align with the General Plan's health protective measures.

11. **Policy NR-4-10** addresses sensitive land uses and new air pollution point sources, such as industrial, manufacturing, and processing facilities. **Standard NR-4-10a** should include reference to toxic air contaminants in addition to odors.

12. Please clarify the third bulleted item under **Implementation Strategy Action 1.5**. There is a discrepancy between the policy number referenced and the topic. Operational criteria air pollutants are discussed in Policy NR-4-1. Construction related criteria air pollutants emissions are discussed in Policy NR-4-8.

13. We recommend adding the most recent version of our Landscaping Guidance for Improving Air Quality near Roadways³ and the Sacramento Tree Foundation's tree list to

² Sacramento Metropolitan Air Quality Management District. Mobile Sources Air Toxics Protocol (July 2018) <http://www.airquality.org/businesses/ceqa-land-use-planning/mobile-sources-air-toxics-protocol>

³ Sacramento Metropolitan Air Quality Management District. Landscaping Guidance for Improving Air Quality near Roadways (April 2017)

Letter F continued

support the development of the City's tree list in **Implementation Strategy Action 12.1 Urban Forestry**. As mentioned above, also consider developing an urban forestry master plan that outlines optimal plantings for urban and non-urbanized areas.

F-2
cont.

DEIR Comments

1. In the bulleted list on **page 5.3-27**, we recommend including SMAQMD's Landscaping Guidance for Improving Air Quality near Roadways and SMAQMD's Recommendations for Siting New Projects Near Existing Sources that Emit Odors and Toxic Air Contaminants.⁴ SMAQMD's landscape guidance was developed in cooperation with the Sacramento Tree Foundation to provide local guidance and best practices for installing vegetative barriers between major roadways and sensitive receptors.
2. The first sentence under the Stationary Sources section on **page 5.3-27** should be updated to clarify that the distances are specified by CARB, not SMAQMD. The DEIR language used to reference **Policy NR-4-9** is not consistent with the policy language in the General Plan.
3. The first sentence in the paragraph above the Conclusion section on **page 5.3-28** should remove "...or land uses that include nonpermitted sources (e.g., truck distribution yards)." Please note that SMAQMD does not apply the 10 in a million threshold to nonpermitted sources of toxic air contaminants.
4. The second paragraph, lines 3-4, of the Mitigation Measures section on **page 5.3-28** should remove "...to levels below the SMAQMD's thresholds of significance." Please note that SMAQMD does not apply the 10 in a million threshold to nonpermitted sources of toxic air contaminants.
5. In order for us to reconcile the data reported in **Table 5.3-5**, please provide additional clarification on the scaling methods used in the air quality analysis and include the updated CalEEMod model outputs, if necessary.

F-3

F-4

F-5

F-6

F-7

TA Guidelines Comments

1. We commend the City for being the first jurisdiction in Sacramento County to incorporate Senate Bill (SB) 743 (Steinberg, 2013) and VMT analysis into its General Plan. Since VMT is directly linked to greenhouse gas (GHG) emissions and criteria air pollution, reducing VMT represents an important component in meeting clean air and GHG reduction goals.
2. In order to ensure consistency between the TA Guidelines and the VMT mitigation programs in **CAP Measure TACM-6**, we recommend including a reference to the CAP on:
 - **page 4** of the VMT Analysis section, by adding the underlined language below:
"*...Projects with VMT exceeding the established limits that are unable to reduce VMT through reduction strategies identified in Table 12:
1. May be required by the City to demonstrate clear community benefit, within the context of the General Plan and consistent with the Climate Action Plan; and...*"
 - **page 29** within the Reduction Strategies (Mitigation).

F-8

<http://www.airquality.org/LandUseTransportation/Documents/SMAQMDFinalLandscapingGuidanceApril2017.pdf>

⁴ Sacramento Metropolitan Air Quality Management District. Recommendations for Siting New Projects Near Existing Sources that Emit Odors and Toxic Air Contaminants (May 2017)

<http://www.airquality.org/LandUseTransportation/Documents/ExistingOdorsToxicsRecommendationsFinal5-12-17.pdf>

Letter F continued

3. The Land Use Project VMT Screening Map shown in **Figure 2 on page 7** shows the VMT exempt areas in white; however, the map does not show the current City boundary. Some of the City's new growth areas, referred to as Study Areas in the General Plan, are also shown in white. Currently, these new growth areas experience much lower than the average VMT because the areas are mostly agricultural land; however, these new growth areas would likely generate higher VMT as development occurs. We recommend that the City clarify the boundary of the current VMT exempt areas.
4. General Plan **Policy MOB-1-1** is also a mitigation measure that requires new development to demonstrate a 15 percent reduction in VMT from 2015 conditions, including induced demand. We recommend that the TA Guidelines provide guidance on assessing induced demand, and that discussion be included in the Mobility Chapter. The California Governor's Office of Planning and Research April 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA⁵ provides guidance on assessing and reporting VMT, including induced VMT.
5. The TA Guidelines only require long-term VMT analysis if a project is not consistent with the current MTP/SCS; however, SB 375 (Steinberg, 2008) implementation of the MTP/SCS alone may not provide sufficient VMT reductions to meet the California Air Resources Board's 2017 Climate Change Scoping Plan's statutory GHG reduction goals.⁶ Therefore, we suggest using VMT analysis and applying the City's CAP thresholds in addition to using MTP/SCS compliance as a screening measure.

F-8
cont.

CAP Comments

1. On page 1-2 of the Introduction, we recommend the use of the term complementary rather than complimentary.
2. In the last paragraph of page 2-5, we recommend the City consider mentioning that wildfire smoke contributes to decreased economic activity, as people tend to avoid venturing outside for shopping, recreational, and other non-essential activities. Scientific evidence suggests that there could be 42,000 deaths related to wildfire smoke by 2050.⁷
3. On page 2-7, line 4, it is not clear which report or study "the new study" references.
4. In light of recent developments, the discussion of federal measures on page 2-10 appears to be incomplete. It may be better to either 1) provide more context and explanation of how lawsuits over the Federal EPA's new rulemaking on fuel economy standards and the Clean Power Plan would play out in the near term; or, 2) omit altogether.
5. We are encouraged that the City is on track to meet its 2020 GHG emissions target based on its 2013 inventory and plans to update its inventory every three years beginning in 2018 to ensure that it is still on target. The regional housing and jobs

F-9

⁵ State of California. Governor's Office of Planning and Research. Technical Advisory on Evaluating Transportation Impacts in CEQA (April 2018)

http://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf

⁶ California Air Resources Board. Updated Final Staff Report on the Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, p.15 and p.35 (February 2018)

https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf

⁷ American Geophysical Union. Wiley Online Library. *Future Fire Impacts on Smoke Concentrations, Visibility, and Health in the Contiguous United States* (July 6, 2018)

<https://agupubs.onlinelibrary.wiley.com/doi/full/10.1029/2018GH000144>

market has improved considerably in the past 5 years, and trends in play in 2013 – in particular, for transportation – may no longer be representative of the region today.

Statewide, transportation emissions have been trending up since 2013, as the economy moved out of recession and gasoline prices remained low. According to CARB’s latest GHG inventory update, transportation emissions declined through 2013, but then grew by 4 percent (7.1 million metric tons CO₂e) from 2014 to 2016, due to gasoline use by on-road vehicles. As the City has continued to be an attractive draw for families and workers, it is likely to reflect these statewide trends, with increased population growth and improved employment and economic conditions, as well as low gasoline prices, all contributing to higher transportation levels.

Thus, the City’s on-road transportation emissions, and possibly overall emissions, may have increased since its 2013 inventory, and the City may be farther from meeting its 2020 GHG target than its 2013 levels would suggest. With on-road transportation making up 47 percent of Elk Grove’s inventory, this is a key sector that deserves more attention to ensure the City can meet its 2020 and 2030 targets.

6. We are encouraged that the City is planning to update the CAP in 2024, which will measure its progress and facilitate its meeting the 2030 target. Because new buildings and roads constructed today can help lock in emissions for at least the next 50 years, early planning and implementation can be critical to helping the City meet its 2030 and 2050 targets efficiently and effectively, without resorting to more expensive emissions-reduction measures.

As noted in **Implementation Measure 4, Action 2.3** if the annual report identifies that additional measures are needed to achieve the City’s GHG reduction goals. We recommend the City phase in zero net energy standards in new commercial development in the 2024 CAP update, or earlier, rather than wait until 2030, as currently stated in **BE-5 Building Stock: Phase in Zero Net Energy Standards in New Construction**.

7. The cost analysis for each CAP measure does not adequately account for potential revenue or other benefits and co-benefits to either the City or the public. Both measures that require no investment and those that generate a profit are categorized the same way, as “Negligible” on page 4-2, failing to distinguish positive-revenue measures from no-cost ones. Highlighting measures that either bring in revenue or increase net benefits provide a more complete picture for the public and decision makers to consider. Similarly, it would be beneficial to create the distinction between minimal costs and net positive gains for private investments. Finally, costs and benefits do not necessarily cancel out; for example, it may cost \$2 million to reduce the risk of developing asthma and lung cancer for 172,000 people, but the City may choose to make that investment. Highlighting public and private direct and co-benefits – such as increased property values – could be helpful to build support for CAP implementation.
8. For measure **BE-2 Upgrade Residential Appliances in Existing Development**, we recommend including a discussion of SMUD’s new incentives to upgrade homes to use all-electric appliances and systems, including water heaters, dryers, cooking range, and HVAC systems. Eliminating the use of natural gas in energy systems is a critical part of decarbonizing the energy system, as natural gas is itself a greenhouse gas. We also recommend broadening the focus from solar water heaters alone to including other options, such as high-efficiency heat pump water heaters.

F-9
cont.

9. The City should consider incorporating energy conservation education, resources, available rebates, etc., into required permitting processes, such as the process of obtaining a business permit to promote measure **BE-3 Nonresidential Appliances in Existing Development**. Additionally, the City should consider including education about SMUD's incentive for replacing high-GWP refrigerants with low-GWP alternatives. This is particularly relevant for businesses with refrigeration, such as gas station stores, corner stores and convenience stores, supermarkets, food-manufacturers and processors.
10. For measure **BE-4 Encourage or Require Green Building Practices in New Construction**, we recommend the City provide additional incentives or streamlining to encourage developers to build all-electric homes, on top of SMUD's existing incentive for new all-electric homes for builders. All-electric homes are safer and cleaner than homes with natural gas – which contain formaldehyde and VOCs – and can reduce the risk of pipeline and at-home leaks. Additionally, all-electric homes are less expensive to construct and may create a more affordable housing stock. The City could work in partnership with SMUD to host demonstration and education events for developers and the public on the efficiency of heat pumps, induction ranges, and smart homes.
11. Please provide more details for **BE-6 Encourage or Require Green Building Practices in Existing Buildings** on how the City plans to provide information, education, and encouragement on energy efficiency improvements for renovations. It is critical to provide this information early so that businesses and residents can factor these improvements into project budgets, timelines, and designs. We suggest that the City define thresholds above which renovations must meet CALGreen Tier 1 standards, such as a percentage of total area or building value, so that there is clear-cut guidance.
12. Consider taking a more technology-neutral approach for measure **BE-7 Solar Photovoltaics and Solar Water Heating in Residential and Commercial Development** that could include high-efficiency heat pump water heaters (which could still be solar-powered).
13. We recommend prioritizing the alternatives listed in measure **RC-2 Organic Waste Reduction** by the alternatives that obtain the most GHG reductions.
14. As requested in comment 4 on the General Plan Policy Document (above), in support of **TACM-2 Transit-Oriented Development**, we request the City to amend the zoning code (as part of Implementation Measure 1.1) to prohibit land use types within ¼ mile of a major transit station that are not transit supportive. Examples of auto-oriented uses include drive-through restaurants and services, car washes, and gas stations. Transit-oriented development should focus on people-oriented uses such as employment, housing, shopping, and dining.
15. In regards to the target indicators in measure **TACM-5 Affordable Housing**, please clarify if the 2030 target of 4,000 homes below market value is in addition to the 2020 target of 3,000 affordable housing units.
16. We commend the City for developing **TACM-6 Achieve a 15 percent reduction in daily VMT compared to existing conditions (2015) for all new development in the City, consistent with state-mandated VMT reduction targets for land use and transportation projects** and its actions items, specifically, the fee based mitigation program to offset project-level and cumulative VMT impacts from projects, with funding

F-9
cont.

Letter F continued

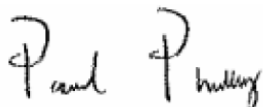
allocated towards implementation of the City's Bicycle, Pedestrian and Trails Master Plan.

17. We support the specific actions defined under measure **TACM-6 Limit Vehicle Miles Traveled** to reduce VMT and appreciate the thresholds defined by the City to support the measure. The City should review the effectiveness of the VMT thresholds annually to ensure continued progress toward VMT reductions and include an update in its scheduled CAP update in 2024.
18. For measure **TACM-9 Install EV Charging Stations** we recommend the City consider innovative strategies to support multi-modal EV charging (including both light and heavy duty vehicles), as well as chargers that can support public and private fleet use, general public use, and use by transportation network companies and car-share operators. This measure is also supportive of **General Plan Policy MOB-3-2 and Standard MOB-3-2a**.
19. We are excited about measure **TACM-8 Tier 4 Final Construction Equipment** due to the co-benefits of criteria and toxic air contaminant reductions. We strongly encourage the City to include TACM-8 in General Plan Policy NR-4-8 along with all the other construction related emissions reducing policies.
20. Overall, we appreciate the level of detail in **Chapter 5** regarding CAP implementation measures and actions items, including the formation of an intra-agency Climate Action Team comprised of CAP Liaisons from City departments, the CAP Development Review Checklist, and quarterly monitoring of the CAP progress.
21. We recommend including a specific timeframe for **Implementation Measure 2, Actions 2.1 and 2.2** for integrating the CAP Development Review Checklist into the City's current planning and development process.
22. It is important for **Implementation Measure 3** that the City designate key staff within the Climate Action Team to be responsible for annual monitoring and reporting (action 3.5) before conducting actions 3.3 and 3.4, so the staff could participate in actions 3.3 and 3.4. It is not clear whether this numerical sequencing of events is also chronological.
23. The flowchart in Figure 5-1 shows the GHG Analysis Streamlining Process. As a general reminder, projects that fall within the CEQA exempt category in this flowchart may still be subject to an existing Air Quality Mitigation Plan and/or Greenhouse Gas Reduction Plan adopted prior to the City developing its CAP. The City must ensure these projects implement adopted reduction measures.

F-9
cont.

Thank you for your consideration of these comments. Please contact one of my staff listed below if you would like to discuss any topic areas further.

Sincerely,



Paul Philley, AICP
Program Supervisor – CEQA & Land Use Section, SMAQMD
(916) 874-4882, Philley@airquality.org

Letter F continued

Cc: Joanne Chan, Air Quality Planner/Analyst – CEQA & Land Use Section, SMAQMD
Phone: (916) 874-6267 Email: JChan@airquality.org

Karen Huss, Air Quality Planner/Analyst – CEQA & Land Use Section, SMAQMD
Phone: (916) 874-4881 Email: KHuss@airquality.org

Molly Wright, Air Quality Planner/Analyst – CEQA & Land Use Section, SMAQMD
Phone: (916) 874-4207 Email: MWright@airquality.org

Shelley Jiang, Climate Change Coordinator – CEQA & Land Use Section, SMAQMD
Phone: (916) 874-4885 Email: SJiang@airquality.org

4.0 COMMENTS AND RESPONSES

Letter F – Paul Philley, Sacramento Metropolitan Air Quality Management District (SMAQMD)

Response F-1:

This is an introductory comment in which the commenter states the City has prepared a comprehensive and user-friendly General Plan and provides information on SMAQMD's mission with regard to air quality and offers specific comments on General Plan policies, the Draft EIR, TA Guidelines, and the Climate Action Plan. Each of these topics are addressed in Responses F-2 through F-9.

Response F-2:

The commenter recommends changes to several General Plan policies. There are no comments in the "General Plan Policy Document Comments" addressing the analysis in the Draft EIR or its conclusions. The City's responses to the comments on the General Plan policies are provided under separate cover and are available at www.elkgrovecity.org/generalplan.

Response F-3:

The commenter recommends amending the bulleted list on page 5.3-27 of the Draft EIR to include the Sacramento Metropolitan Air Quality Management District's (SMAQMD's) Landscaping Guidance for Improving Air Quality near roadways and SMAQMD's Recommendations for Siting New Project Near Existing Sources that Emit Odors and Toxic Air Contaminants.

The commenter proposes revisions to the discussion of toxic air contaminants (TACs) under Impact 5.3.4 which commences on page 5.3-24 of the Draft EIR. The analysis provided under Impact 5.3.4 includes a discussion of existing regulations, guidelines, and proposed general plan policies that would serve to mitigate for long-term exposure to harmful levels of TACs for development build-out under the proposed Project.

In response to this comment, the following text has been added following the bulleted list on page 5.3-27 to include additional existing measures that serve to minimize TAC exposure as recommended by SMAQMD:

SMAQMD has developed guidance based on EPA's Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality. In April 2017, SMAQMD published the Landscaping Guidance for Improving Air Quality Near Roadways (Landscape Guidance) to provide recommendations to projects constructed within the Sacramento Valley Air Basin in consideration of local climate and appropriate flora. SMAQMD developed the Landscape Guidance in coordination with the Sacramento Tree Foundation. Based on the information presented in the Landscape Guidance, the following recommendations could apply to development projects to reduce exposure from mobile-source TAC emissions (SMAQMD 2017b).

SMAQMD expanded its Guide to Air Quality Assessment in Sacramento County and published Recommendations for Siting New Project Near Existing Sources that Emit Odors and Toxic Air Contaminants. Recommendations to reduce TAC exposure that would lead agencies could apply to development under the proposed Project include, but are not limited to, the following (SMAQMD 2017c):

- identifying sources that emit TACs within 0.5-miles of a proposed project site.

- evaluating the meteorology of a project site and area.
- conduct a health risk assessment (HRA).
- provide vegetative barriers between the source and receptors, and
- install HVAC systems capable of at least MERV 13 in each proposed building.

Compliance with the aforementioned SMAQMD guidance documents would serve to reduce the opportunity for a sensitive receptor to be subject to prolonged exposure to high concentrations of TACs.

In response to this comment, the following revisions have been made to the first paragraph of page 5.3-18 of the Draft EIR:

The SMAQMD requires projects that exceed the PM10 and PM2.5 emissions thresholds after implementation of the Basic Practices to implement all feasible and applicable measures of the Enhanced Fugitive PM Dust Control Practices. Implementation of the Enhanced Fugitive PM Dust Control Practices will reduce total fugitive PM dust emissions by an additional 21 percent above the Basic Practices (SMAQMD 2017a).

In response to this comment, the following revisions have been made to Chapter 5.3 of the Draft EIR on page 5.3-34:

_____. 2017a. CEQA Guidelines – Chapter 3, Construction-Generated Criteria Air Pollutant and Precursor Emissions. Accessed December 8, 2017.
<http://www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools>.

_____. 2017b (April). Landscaping Guidance for Improving Air Quality Near Roadways. Accessed October 20, 2017.
<http://www.airquality.org/LandUseTransportation/Documents/SMAQMDFinalLandscapingGuidanceApril2017.pdf>.

_____. 2017c (May). Recommendations for Siting New Projects Near Existing Sources that Emit Odors and Toxic Air Contaminants. Accessed October 20, 2018.
<http://www.airquality.org/LandUseTransportation/Documents/ExistingOdorsToxicsRecommendationsFinal5-12-17.pdf>.

Response F-4:

The commenter recommends that the language of the first sentence under the Stationary Sources section on page 5.3-27 be amended to clarify that distances from sources are recommended by the California Air Resources Board (CARB) and not SMAQMD.

In response to this comment, the following revisions have been made to the first sentence of the fifth paragraph on page 5.3-27 of the Draft EIR:

General Plan Policy NR-4-9 prohibits the future siting of sensitive land uses (including schools) within distances specified by the ~~SMAQMD~~ CARB of stationary sources of TACs unless adequate mitigations measures are adopted and implemented.

4.0 COMMENTS AND RESPONSES

Response F-5:

The commenter recommends that the first sentence in the paragraph above the “Conclusion” subsection on page 5.3-28 should be revised to reflect that SMAQMD does not apply the 10 in one million threshold to nonpermitted sources of TACs.

In response to this comment, the following revisions have been made to the first sentence of the second paragraph on page 5.3-28 of the Draft EIR:

These permitting requirements are identical to the SMAQMD's thresholds of significance for TACs generated by stationary sources ~~or land uses that include nonpermitted sources (e.g., truck distribution yards)~~. Therefore, lead agencies can determine that a new stationary source of TACs that attains the authority to construct and permit to operate from the district would not exceed the SMAQMD's applicable TAC thresholds of significance.

Response F-6:

The commenter recommends that the second paragraph of the Mitigation Measures section on page 5.3-28 should be revised to reflect that SMAQMD does not apply the 10 in one million threshold to nonpermitted sources of TACs.

In response to this comment the following revisions have been made to the fifth paragraph on page 5.3-28 of the Draft EIR.

All feasible mobile source TAC health risk reduction measures have been incorporated into the Project through the inclusion of the General Plan policies discussed above. There could be additional project-specific mitigation measures to reduce the health risks of mobile-source TACs ~~to levels below the SMAQMD's thresholds of significance~~. However, the nature, feasibility, and effectiveness of such project-specific mitigation cannot be determined at this time. As such, the City cannot assume that mitigation would be available and implemented such that all future health risk increases (~~i.e., e.g.~~, an incremental increase in cancer risk greater than 10 in one million or concentrations of TACs with a Hazard Index greater than 1) from exposure to TACs would be reduced to less than significant levels. Therefore, this impact would remain significant and unavoidable.

Response F-7:

The commenter requests more clarification regarding the scaling methodology used in the air quality analysis to reconcile the data provided in Table 5.3-5 of the Draft EIR.

As discussed in Appendix C of the Draft EIR, construction land uses were derived from subtracting the total land uses under the proposed Project by the total land uses contained in the City's existing General Plan, then divided by 20 to conservatively assume that construction of development would occur consistently over the lifetime of the proposed Project (i.e., 20 years). The CalEEMod 2016.3.2 computer program was used to estimate emission of criteria air pollutants and ozone precursors (i.e., reactive organic gases, oxides of nitrogen, respirable particulate matter, and fine particulate matter) for which SMAQMD had adopted construction thresholds of significance. The land uses represented in Appendix C were scaled back by five so as to avoid overwhelming the program. These emissions outputs were then scaled up by five in

the Microsoft Office Excel program, which is contained in Appendix C and summarized in Table 5.3-5. No changes to the Draft EIR are required in response to this comment. No further response is required.

Response F-8:

The comments in the "TA Guidelines" subsection of the comment letter address TA Guidelines. There are no comments on the adequacy or conclusions of the Draft EIR. The City's responses to the TA Guidelines comments are provided under separate cover and are available at www.elkgrovecity.org/generalplan.

Response F-9:

The comments in the "CAP comments" subsection of the comment letter address the City's Climate Action Plan. There are no comments on the adequacy or conclusions of the Draft EIR. The City's responses to the CAP comments are provided under separate cover and are available at www.elkgrovecity.org/generalplan.



Sent Via E-Mail

September 25, 2018

Christopher Jordan
City of Elk Grove
8401 Laguna Palms Way
Elk Grove, CA 95758
cjordan@elkgrovecity.org

Subject: City of Elk Grove General Plan Update Project / EIR / 2017062058

Dear Mr. Jordan:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Environmental Impact Report (EIR) for the City of Elk Grove General Plan Update Project (Project, SCH 2017062058). 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.

It is our desire that the Project EIR will acknowledge any Project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
 - <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
 - <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery

G-1

G-2

Letter G continued

SMUD staff will attend the public workshops on the individual elements and would like to provide additional comments and information to City of Elk Grove staff as the discussion continues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this EIR. If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Ashlen McGinnis, at ashlen.mcginnis@smud.org or 916.732.6775.

Sincerely,



Nicole Goi
Regional & Local Government Affairs
Sacramento Municipal Utility District
6301 S Street, Mail Stop A313
Sacramento, CA 95817
nicole.goi@smud.org

Cc: Ashlen McGinnis

G-3

Letter G – Nicole Goi, Sacramento Metropolitan Utilities District (SMUD)

Response G-1:

The commenter provides information on SMUD's vision regarding provision of energy. This is not a comment on the adequacy of the EIR and no response is required.

Response G-2:

The commenter notes several topics that should be acknowledged in the EIR. Because the Project does not propose development at this time, the EIR addresses potential impacts programmatically. Future development projects will address potential conflicts with overhead or underground utilities, utilities routing, and load requirements when plans are developed. Energy efficiency, climate change, and cumulative energy delivery are addressed in Draft EIR section 5.7, Greenhouse Gases and Energy. No further response is required.

Response G-3:

The commenter expresses a desire to work with the City as the General Plan and EIR process continues. This is not a comment on the adequacy of the EIR and no response is required.

Letter H



September 26, 2018

City of Elk Grove
Attn: Christopher Jordan, AICP, Director of Strategic Planning and Innovation
8401 Laguna Palms Way
Elk Grove, CA 95758

Re: Comments on the Draft General Plan and Draft Environmental Impact Report

Dear Mr. Jordan,

Thank you for inviting SACOG's comments on the Draft General Plan and Draft Environmental Impact Report (DEIR). The basis for our comments is the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and Blueprint. SACOG's primary responsibility is developing and implementing the MTP/SCS, a document that establishes transportation spending priorities throughout the region. The MTP/SCS must be based on the most likely land use pattern to be built over the 20+ year planning period, and it must conform with federal and state air quality regulations. The foundation for the MTP/SCS land use forecast is local government general plans, community plans, specific plans, and other local policies and regulations. Other market and regulatory/policy variables that are considered help refine the sum of the local plans in order to determine the most likely future development pattern for a specific period of time. The Blueprint vision is based on the principles of smart growth and is intended to give general direction on how the region should develop to reap the benefits of the Blueprint Preferred Scenario (and related MTP/SCS). Implementation of the Blueprint vision depends greatly on the efforts of cities and counties to implement that vision through local plans and projects. The MTP/SCS and Blueprint are in alignment with each other because of these local efforts.

The current Metropolitan Transportation Plan/Sustainable Communities Strategy (2016 MTP/SCS) was adopted in February 2016. The 2016 MTP/SCS includes a transportation project list and forecast of housing and employment expected through 2036. The Draft General Plan Land Use Diagram and Transportation Network Diagram includes potential growth areas and proposed transportation projects that are not included in the MTP/SCS. In general, it is not uncommon that a General Plan will include more growth and transportation projects than what is in the MTP/SCS. General Plans typically envision the ultimate build out of the jurisdiction whereas the MTP/SCS is a financially constrained plan for a particular period of time, is updated every four years, and is subject to a transportation conformity requirement under the federal Clean Air Act. As you know, SACOG is midway through its quadrennial update of the MTP/SCS and will continue

Auburn
Citrus Heights
Colfax
Davis
El Dorado County
Elk Grove
Folsom
Galt
Isleton
Live Oak
Lincoln
Loomis
Marysville
Placer County
Placerville
Rancho Cordova
Rocklin
Roseville
Sacramento
Sacramento County
Sutter County
West Sacramento
Wheatland
Winters

H-1

Letter H continued

to work with City of Elk Grove to determine if there is a need to update the project list and/or projections for the City in the 2020 MTP/SCS.

H-1
cont.

SACOG is supportive of the City’s efforts to grow jobs to balance the currently high ratio of housing to jobs. In addition to the quality of life benefits residents get when they have jobs and services close where they live, we know there is a strong connection between land use patterns, travel behavior, and air quality. Specifically, certain land use strategies, such as jobs-housing balance, lead to increased walking, biking, and transit use, shorter automobile trips, and reduced mobile-source air pollution. For the region to realize the vehicle miles travel reduction, congestion reduction, and air pollution reductions that the MTP/SCS achieves, it is important for communities that currently have a low ratio of jobs to housing, such as Elk Grove, to plan for and attract enough job growth over time to minimize the need for long-distance commuting out of the city. To ensure that the City implements the vision of the Draft General Plan, we would like to work with the City on adding strong, measurable, implementation-focused policies. Specifically, we recommend that the City include policies around the timing and phasing of the proposed “Study Areas.” Policies that require phased growth encourage a complete neighborhood and can be used to help the City ensure its goal of more employment is being met before a significant number of new homes are added in this area. Examples of this type of policy could include timing and conditions for when development can occur in relation to the build out of the Southeast Policy Area, establishing thresholds for employment and/or neighborhood serving commercial that must be reached before additional housing growth can occur, or roadway usage metrics. We appreciate the discussions that we’ve had on this to date and would like the opportunity to work with the City in the coming months to incorporate such policies into the General Plan.

H-2

Additionally, the “Study Areas” outside the existing limits encompass a larger area than the future urbanized area that the Blueprint Preferred Scenario envisioned post-2050. We encourage the City to implement strong and clear policies around any potential future development of these areas for the reasons stated above, and also because research from our Rural-Urban Connection Strategy (RUCS) project indicates that the more certainty there is about the edge of future urbanization, the lesser the impact will be on neighboring farming operations. A higher percentage of land is more likely to remain in active agriculture if there is some long-term certainty that farming is an economically viable use of the land. As a region, we should do all we can to support agriculture, which is one of our few tradable industries. We also know that development speculation can have a ripple effect on agriculture, so strong policies related to the City’s intentions beyond the Study Areas would have multiple benefits.

This MTP/SCS update is connected to a Regional Housing Needs Allocation (RHNA) cycle as well. The Draft General Plan shows most of the City’s current RHNA being accommodated in a concentration of land in the Laguna Ridge and Southeast Policy Area new growth areas. In light of the legislative changes of the 2017 State Housing Package, concentrating the sites in this way is likely to be problematic for the City because of the new “no net loss” provision. This provision stipulates that if a site identified for lower income units is built at market rate, or even at a lesser number of affordable units, the City must “identify and make available” a new site within 180 days. This would entail rezoning a different site to accommodate the lower-income units that could no longer be accommodated on the original site. We strongly recommend the City use the opportunity of the General Plan Update to add additional by-right multi-family sites in more locations throughout the City.

H-3

It is evident from the Draft General Plan that the City is committed to, and supportive of, building transit service, including new bus rapid transit, light rail, and commuter rail options. In the draft document, Policy

H-4

Letter H continued

LU-6-8 is supporting transit-friendly uses and densities to support future light rail. SACOG is supportive of the City's effort to plan for future transit. However, a robust transit system, including funding for it, is dependent on supportive land uses. To support the City's transit goals, we suggest strengthening that policy and making additional changes to help implementation of such policies. Specifically, we recommend increases to the allowed densities near transit, exclusion of auto-oriented uses, and providing objective standards for infill projects. Village Commercial Mixed Use and Residential Mixed Use are the two primary land uses centered around the potential future light rail alignment. These uses have a minimum density of 15 units per acre and a maximum of 40 units per acre. We suggest a minimum of 20 units per acres to be supportive of future transit. Also, we would like to see additional policies around what specific uses are most desired near the future transit areas and what uses are prohibited (such as gas stations, car washes, mini storage, and other auto-oriented uses). This type of specificity is essential to good implementation of Policy LU-6-8. We have examples of these types of policies from other jurisdictions in our region and would be happy to share or discuss further with you. Related, policies like Policy LU-2-4, which "requires new development infill projects to be compatible with the character of surrounding areas and neighborhoods..." can be at odds with increasing densities near transit and make it difficult to implement other policies in the draft plan. Instead, we would suggest providing objective standards and more clarity on what type of uses are and are not allowed and are or are not transit supportive.

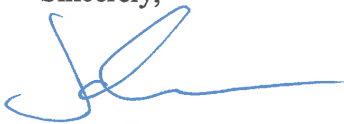
H-4
cont.

Lastly, we commend the City for being one of the first in our region to develop guidelines for implementing SB 743. However, we would like to have a better understanding of the City's Draft Transportation Analysis. Because it is a new law, we would like to have a meeting with you dedicated to this. We believe it is imperative that both SACOG and the City understand how the City's Draft Transportation Analysis Guidelines relate to the regional framework for implementing SB 743.

H-5

Thank you again for the opportunity to comment and for continuing to engage us in this important process. We look forward to further discussions with the City. Please don't hesitate to contact myself or Kacey Lizon, Planning Manager at klizon@sacog.org or 916-340-6265 if you have further questions.

Sincerely,



James Corless
Chief Executive Officer

Letter H – James Corless, Sacramento Area Council of Governments (SACOG)

Response H-1:

The commenter describes SACOG's Metropolitan Transportation Plan Plan/Sustainable Communities Strategy (MTP/SCS). The commenter notes that, while the proposed General Plan includes growth that is not assumed in the MTP/SCS, it is not uncommon for general plans to include more growth than assumed in the MTP/SCS and SACOG will continue to work with the City as SACOG updates the MTP/SCS. This is not a comment on the adequacy of the EIR and no response is required.

Response H-2:

The commenter recommends that the General Plan include policies regarding timing and phasing of the Study Areas and encourage complete neighborhoods to achieve the City's goal of more employment. The commenter is referred to General Plan Chapter 4, which includes policies intended to create safe, livable, and complete neighborhoods, while preserving traditional neighborhoods and rural areas and fostering employment. This is not a comment on the adequacy of the EIR and no response is required.

Response H-3:

The commenter encourages more by-right multi-family sites in the General Plan to aid in future compliance with the 2017 State Housing Package. Comment noted. This is not a comment on the adequacy of the EIR and no response is required.

Response H-4:

The commenter recommends increased residential density and exclusion of auto-oriented uses near transit. Comment noted. This is not a comment on the adequacy of the EIR and no response is required.

Response H-5:

The commenter requests a meeting with the City to discuss the Draft Transportation Analysis. This is not a comment on the adequacy of the EIR and no response is required.

DEPARTMENT OF TRANSPORTATION**DISTRICT 3**

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 MARYSVILLE, CA 95901
 PHONE (530) 741-4004
 FAX (530) 741-4245
 TTY 711
 www.dot.ca.gov/dist3

Letter I

*Making Conservation
 a California Way of Life.*

September 26, 2018

Ref. SCH #2017062058

Christopher Jordan, AICP
 City of Elk Grove
 8401 Laguna Palms Way
 Elk Grove, CA 95758

Dear Mr. Jordan:

Thank you for including the California Department of Transportation (Caltrans) in the opportunity to review the Draft Environmental Impact Report (DEIR) for the City of Elk Grove General Plan Update. The following comments are based on the DEIR.

Project Understanding

The Planning Area for the General Plan Update contains all land within City boundaries, as well as lands outside the City in unincorporated Sacramento County to the south and east that have been included in the City's planning activities. The Planning Area encompasses approximately 48.8 square miles (31,238 acres) in south-central Sacramento County. The City is generally bounded by Interstate 5 (I-5) on the west, Calvine Road and the City of Sacramento on the north, Grant Line Road on the east, and Kammerer Road on the south. State Route (SR) 99 runs north-south, bisecting the City near its center. The Planning Area boundaries generally coincide with the City limits on the north and west, but the Planning Area extends to Core Road and Eschinger Road to the south and to the Deer Creek floodplain to the east.

I-1

Impacts to SR 99 and I-5

Caltrans agrees with the statement made for Impact 5.13.2 on page 5.13-54; "Implementation of the proposed Project would exacerbate unacceptable (LOS F) conditions on SR 99 and I-5. This impact is considered potentially significant. The proposed Project includes land use and transportation network changes that would increase future traffic volumes on SR 99 and I-5...all study segments of SR 99 and I-5 would operate at LOS F in 2036 (Table 5.13-6). Implementation of the proposed Project would contribute to unacceptable operations on these facilities."

I-2

Letter I continued

Mr. Christopher Jordan
September 26, 2018
Page 2

Appropriate mitigation that alleviates congestion exacerbated by the project should be implemented. Policy MOB-7-5 states “Assist Caltrans in implementing improvements to Interstate 5 and State Route 99 within the City as outlined in the most recent Caltrans Transportation Concept Report (TCR).” Caltrans agrees with this statement.

I-2
cont.

Specific Comments on the DEIR

- Policy MOB-7-5 cites the TCR as a standard to guide improvements to I-5 and SR 99. In addition to the TCR, location-specific and other circumstances may bring additional operational or design considerations that may inform the need for future improvements. Please include a note to this effect where the TCR is referenced for project identification.
- Please review the Synchro files for the I-5/Hood Franklin interchange. The AM and PM peak hour left turning volumes from southbound I-5 appear to be too comparable, without accounting for volumes on reciprocal travel directions between AM and PM peak periods.

I-3

I-4

I-5 Subregional Corridor Impact Mitigation Fee Program

We encourage the City to coordinate and contribute to future projects on the state highway system in Elk Grove. Such projects within the Elk Grove City limits include adding auxiliary lanes on SR 99, HOV Lanes on I-5, and improving ramp metering/other ITS elements throughout both corridors. These, and other similar projects, would help relieve congestion, increase transit efficiency, and improve travel time reliability. These projects to improve the state highway system are essential to residents of Elk Grove because of the significant number of work trips traveling to regional employment centers in Downtown Sacramento and Rancho Cordova, as illustrated in Figures 5.13-1 and 5.13-2. The proposed Project will also have significant impacts to the SR 99/Grant Line Rd and I-5/Hood Franklin Rd Interchanges. The SB SR 99/Grant Line Rd offramp and intersection will operate at LOS F in the AM and PM (as shown in the Transportation Impact Study for the Elk Grove Sphere of Influence Amendment and Multi-Sport Park Complex). The SB I-5/Hood Franklin Road offramp and intersection will be severely impacted by the proposed Kammerer Rd Extension, which is discussed further on in this letter.

I-5

I-6

Kammerer Road Extension

Caltrans is working with the City of Elk Grove and the Capital SouthEast Connector Road Joint Powers Authority (JPA) with regard to the Kammerer Road extension and the existing I-5/Hood Franklin Road interchange. While we did not provide input specific to the Kammerer Road Extension in our comment letter for the Notice of Preparation for the General Plan Update EIR, we have been engaged in identifying appropriate approaches toward programmatic funding strategies for future phases of the Connector Road. The General Plan Update provides an excellent opportunity to synchronize the Kammerer Road Extension with the I-5 Subregional

I-7

Letter I continued

Mr. Christopher Jordan
September 26, 2018
Page 3

Corridor Impact Mitigation Fee Program, with an eye on the I-5/Hood Franklin interchange and mainline I-5.

I-7
cont.

The General Plan Update DEIR

The DEIR forecasts the capacity for 25,208 new dwelling units within the Kammerer Road Corridor between I-5 and SR 99, in the West and South Study Areas. The JPA incorporated the appropriate land use assumptions based on available information on approved projects in their analysis for the I-5/Hood Franklin interchange. However, page 6.0-2 of the DEIR affirms the City's intent to annex and develop these areas, introducing approximately 14,542 dwelling units not accounted for in the analysis for the interchange, which forecasts 10,666 dwelling units within the corridor for design year 2044.

I-8

Impacts and Mitigation

Due to operational and design standards, Caltrans requires a set of improvements to the I-5/Hood Franklin interchange and mainline I-5 associated with the Kammerer Road Extension portion of the Capital SouthEast Connector Road. The requirements are actuated through the additional demand introduced by the Kammerer Road Extension, and through subsequent land use actions citywide and within the Kammerer Road corridor.

Specifically associated with the Kammerer Road Extension, Caltrans requires:

- Dual left turn lanes at the southbound I-5/Hood Franklin offramp
- Dual receiving lanes on eastbound Hood Franklin (Kammerer/Connector) Road, including widening of the structure
- Ramp meters on the I-5/Hood Franklin onramps, northbound and southbound
- Auxiliary lanes extending 2,000 feet north of the I-5/Hood Franklin interchange, in both directions
- Extend the I-5 Managed Lane Project to one mile south of the I-5/Hood Franklin interchange

I-9

Phasing, Actuating Conditions and Funding Opportunities

We require the turn lanes, receiving lanes and ramp meters as of opening day for the Kammerer Road Extension. The auxiliary lanes and extension of Managed Lane Project are apt candidates for inclusion alongside future phasing toward ultimate configuration for the Kammerer Road Extension. A number of actions would need to occur to introduce demand sufficient for cost sharing and future phasing, such as approval of the Kammerer Road Extension, approval of this General Plan Update, future annexations and future specific plan/project approvals as discussed in the DEIR. A closer analysis will identify appropriate actuating conditions or trigger points to

Letter I continued

Mr. Christopher Jordan
 September 26, 2018
 Page 4

implement the mainline improvements. These improvements, responsible/contributing/oversight agencies and potential funding opportunities are indexed in Table 1, below:

Table 1 – Capital SouthEast Connector, A1/A2 Kammerer Road Mitigation Requirements

Improvement	Location	Actuating Condition	Lead/Contributing/Oversight Agencies	Potential Opportunities	Potential Fee Program Applicability
Dual left turn lanes	SB offramp, I-5/Hood Franklin	Opening Day	JPA, City of Elk Grove, Caltrans	Connector Road Approval	No
Dual receiving lanes (includes structure widening)	Eastbound Hood Franklin Rd, beginning at SB I-5 offramp, length TBD	Opening Day	JPA, City of Elk Grove, Caltrans	Connector Road Approval	No
Ramp meters	Hood Franklin/I-5 onramps, both directions	Opening Day	JPA, City of Elk Grove, Caltrans	Connector Road Approval	No
Aux lanes, 2000 ft.	I-5 north of Hood Franklin, both directions	TBD through analysis	JPA, LAFCO, City of Elk Grove, Caltrans, SACOG	General Plan Update Approval, MTP Update Approval, Connector Road Approval, Annexation of Study Areas, Specific Plan Approval	Yes
Extend I-5 Managed Lane Project	Extend from Elk Grove Blvd to 1 mile south of Hood Franklin Interchange	TBD through analysis	JPA, LAFCO, City of Elk Grove, Caltrans, SACOG	General Plan Update Approval, MTP Update Approval, Connector Road Approval, Annexation of Study Areas, Specific Plan Approval	Yes

I-9
 cont.

Available Air Pollutant Emissions Avoidance

We applaud the City’s efforts toward Zero Emission Vehicle (ZEV) infrastructure as conditions of approval. Where additional VMT cannot be avoided, its greenhouse gas (GHG) emissions can at least be reduced.

Governor’s Executive Order B-48-18 states that California is the largest market in the United States for ZEVs. The number of ZEVs in California increased by 1,300% in six years, from 25,000 in 2012 to more than 350,000 as of January of this year. While the transportation sector still emits half of California’s total GHG emissions and 80% of nitrogen oxides, which form smog, it is the state’s goal to increase the number of ZEVs in California to 1.5 million by the year 2025. For new and existing facilities, a number of incentive programs are available through the California Energy Commission, the California Air Resources Board, the California Public Utilities Commission and other organizations, following the enactment of Senate Bill 350. Caltrans requests the opportunity to review the results of quantitative analysis demonstrating what emission reductions could be achieved through the implementation of such a strategy.

I-10

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”

Letter I continued

Mr. Christopher Jordan
September 26, 2018
Page 5

Please see the web pages at the links below for more information on ZEV infrastructure incentives:

California Energy Commission – Plug-In Electric Vehicles (PEVs)

<http://www.energy.ca.gov/transportation/zev/pev/>

California Air Resources Board – DriveClean PEV Resource Center

<https://www.driveclean.ca.gov/pev/Incentives.php?submit=submit&bev=1>

California Public Utilities Commission – Zero-Emission Vehicles

<http://www.cpuc.ca.gov/zev/>

Please contact Gary Arnold, Special Projects and Sustainability Manager, at (530) 741-4004 or by email at gary.arnold@dot.ca.gov or Alex Fong, Chief, Transportation Planning – South, at (530) 634-7616, or by email at alexander.fong@dot.ca.gov.

Sincerely,



GARY S. ARNOLD
Special Projects and Sustainability Manager

cc: State Clearinghouse

I-10
cont.

4.0 COMMENTS AND RESPONSES

Letter I – Gary S. Arnold, California Department of Transportation (Caltrans)

Response I-1:

The commenter summarizes the proposed Project. No response is required.

Response I-2:

The commenter agrees with the conclusions in Draft EIR Impact 5.13.2 regarding levels of service conditions on SR 99 and I-5 and expresses support for General Plan Policy MOB-7-5. No response is required.

Response I-3:

The commenter states, in reference to Policy MOB-7, that location-specific and other circumstances may bring additional operational or design considerations that may inform the need for future improvements. Policy MOB-7-5 is intended to ensure that improvements identified in the Caltrans Transportation Concept Report can be implemented, but it does not preclude implementation of future improvements where location-specific and other circumstances require additional or different improvements.

Response I-4:

The commenter requests review of the Synchro traffic operations analysis of the I-5/Hood Franklin Road Interchange to confirm the AM and PM peak hour input volumes. After review, it appears that the AM and PM peak hour volumes for the westbound right-turn movement at the signal controlled northbound ramp terminal intersection were incorrectly entered. In the AM peak hour, the volume entered was 410, but should have been 1,510; in the PM peak hour, the volume entered was 110 and should have been 930. However, the analysis results are unchanged when using the correct volumes, since the right-turn movement was assumed to be a free movement and not controlled by the traffic signal.

Response I-5:

The commenter describes the I-5 Subregional Corridor Impact Mitigation Fee Program (SCMP) as it relates to projects in Elk Grove and encourages the City of Elk Grove to contribute to future projects on the state highway system in Elk Grove. In September 2017, the City of Elk Grove adopted the Subregional Corridor Mitigation Fee Program as an option to mitigate impacts on the State Highway System. The SCMP is a voluntary program for new development within the I-5, SR 99, SR 51, and US 50 corridors between the cities of Elk Grove, Sacramento, and West Sacramento, which was developed with each city in collaboration with Caltrans. SCMP impact fee contributions can be made in lieu of conducting a detailed traffic impact study for freeway mainline impacts, include freeway mainline analysis, "merge and diverge" analysis and weaving analysis on the mainline under both existing and cumulative conditions. However, improvements to the I-5/Hood Franklin Road interchange, which would include improvements to the merge/diverge operations at I-5, are not included in the SCMP at this time.

The following General Plan Policies address funding roadway and intersection improvements to implement the City's Transportation Network Diagram, implementing improvements on the state highway system, and development of the Capital SouthEast Connector:

Policy MOB-7-4 – Require new development projects to provide funding or to construct roadway/intersection improvement to implement the City's Transportation Network Diagram. The payment of adopted roadway development or similar fees, including the City Roadway Fee Program and the voluntary I-5 Subregional Fee, shall be considered compliant with the requirements of this policy with regard to those facilities included in the fee program, provided the City finds that the fee adequately funds required roadway and intersection improvements. If payment of adopted fees is used to achieve compliance with this policy, the City may also require the payment of additional fees if necessary to cover the fair share cost of facilities not included in the fee program.

Policy MOB-7-5 – Assist Caltrans in implementing improvement to Interstate 5 and State Route 99 within the City as outlined in the most recent Caltrans Transportation Concept Report.

Policy MOB-7-6 – Support efforts to develop the Capital SouthEast Connector, providing a regional roadway connection from Interstate 5 and State Route 99 to US 50. The will work with the Capital SouthEast Connector Joint Powers Authority in implementing the planned roadway improvements.

These policies demonstrate the City's commitment to contribute to the funding of future transportation improvements. No changes to the Draft EIR are required.

Response I-6:

The commenter states the Project will have significant impacts to the SR 99/Grant Line Road and I-5/Hood Franklin Road Interchanges. The Draft EIR for the General Plan Update is a programmatic EIR as defined in Section 15168 of the State CEQA Guidelines. That section defines a programmatic EIR as one that applies to "a series of actions that can be characterized as one large project and are related either (1) geographically; (2) as logical parts in the chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways." Subsequent activities would be reviewed by the City to determine if they are covered by the program EIR or whether a project-specific environmental document must be prepared. CEQA Guidelines Section 15161 defines a project EIR as one that "examines the environmental impacts of a specific development project." For example, while an EIR for a general plan would be a programmatic EIR, the environmental review for a specific development application or roadway improvement would be a subsequent project-level analysis.

Draft EIR Impact 5.13-1 addresses level of service conditions at study intersections and on roadway segments, based on the City's current General Plan level of service policy. The impact identifies unacceptable LOS at and near the SR 99/Grant Line Road interchange and acceptable operations at the I-5/Hood Franklin Road interchange ramp-terminal intersections with implementation of the General Plan Update Project.

In addition, the commenter makes the following statements that appear to be based on and reference transportation analysis conducted for environmental analysis for separate projects:

- The SB SR 99/Grant Line Road Off-ramp and intersection will operate at LOS F in the AM and PM (as shown in the Transportation Impact Study for the Elk Grove Sphere of Influence Amendment and Multi-Sport Park Complex).

4.0 COMMENTS AND RESPONSES

- The SB I-5/Hood Franklin Road off-ramp and intersection will be severely impacted by the proposed Kammerer Road Extension.

The analysis conducted for these various projects were based upon the timing and phasing of each individually as it relates to population and employment growth and the transportation network, including the number of travel lanes on Grant Line Road and Kammerer Road. For example, this EIR for the General Plan Update looks at cumulative conditions at full buildout of the General Plan, which (based upon current growth trends) would be after 2050. Full buildout of the General Plan is assumed at 102,865 dwelling units and 122,155 jobs with a resident population of 332,254 people. Again, this Draft EIR is a programmatic analysis and considers the all the potential activities that may occur, in total, towards implementation of the General Plan as a project.

The Kammerer Road Extension considers two initial phases of construction for that roadway, based upon near-term need of development, with first phase construction in 2021 and second phase in 2024. The improvements, as defined in that project, have a design year of 2044 (conditions 20 years beyond construction, consistent with Caltrans Project Development Procedures Manual). This analysis is a project-level analysis and is based upon current growth trends and information from the Sacramento Area Council of Governments (SACOG) 2016 Metropolitan Transportation Plan. As such, the Kammerer Road Extension Mitigated Negative Declaration considered development in 2044 with 66,361 dwelling units and 61,097 jobs. Both data points are less than the draft General Plan's programmatic buildout total and is within the development assumptions for the buildout of the existing City Limits.

The Kammerer Road Extension project is a phase of the ultimate roadway sizing for Kammerer Road, which is defined at the programmatic level in the Draft General Plan EIR. The larger facility is not necessary until development occurs beyond the existing City limits, in addition to full development of lands within the City limits, has occurred. These additional phases are necessary to support additional development in the area, principally the South and West Study Areas. At such time as those improvements are necessary, or in conjunction with development approvals for those Study Areas as provided in the draft General Plan policies, additional project-level environmental review will be completed. That analysis will consider the effects of the additional roadway improvements and necessary mitigation to address those impacts. Consideration of those impacts and establishment of mitigation measures would be speculative at this time as no specific development project is being considered and the South and West Study Areas have not been annexed to the City.

For the Multi-Sport Park Complex, traffic volume forecasts developed for the transportation impact study were based on the City of Elk Grove's current General Plan, but also included buildout of the Bilby Ridge Sphere of Influence Amendment area and the Kammerer Road/Highway 99 Sphere of Influence Amendment area as a worst-case analysis because the Multi-Sports Park Complex EIR considers both the programmatic impacts of the Sphere of Influence Amendment by the Sacramento Local Agency Formation Commission and the project-level impacts of the Multi-Sports Park Complex itself. The project-level impacts analyzed in the Multi-Sports Park Complex EIR include an analysis of fair-share mitigation for improvements to the transportation system.

Traffic volume forecasts developed for the General Plan Update include buildout of the current City Limits and the entirety of the Study Areas. As stated above, Draft EIR Impact 5.13-1 identifies acceptable operations at the I-5/Hood Franklin Road interchange ramp-terminal intersections with implementation of roadway improvements identified in the General Plan Update Project, which includes improvements proposed to the I-5/Hood Franklin Road interchange. The timing

of these improvements will be determined as part of subsequent project-level environmental review, such as with subsequent development or annexation applications.

Response I-7:

The commenter notes that the General Plan Update provides an opportunity to synchronize the Kammerer Road extension with the voluntary I-5 Subregional Corridor Impact Mitigation Fee Program. The voluntary I-5 Subregional Fee was based upon a certain level of assumed development and corresponding facility improvements necessary to support this development. These assumptions considered full buildout of the existing City limits, consistent with the development assumptions described in Response I-6. It did not consider any development beyond the existing City limits, including in the South or West Study Areas. At such time as development is proposed in those areas and corresponding project-level CEQA analysis is completed, either the voluntary I-5 Subregional Fee may be updated or mitigation measures identifying the fair-share improvements necessary to support those projects will be determined.

This is not a comment on the adequacy of the Draft EIR and no further response is required. Please see Response I-5 for a discussion of General Plan Update policies related to transportation improvement funding and coordination with other jurisdictions and agencies.

Response I-8

The commenter notes that the new dwelling units that are part of the West and South Study Areas were not included in the land use assumptions used for the analysis of the Kammerer Road Extension Project DEIR, but that the Connector JPA did incorporate the appropriate land use assumptions. As noted in the comment, the forecasts developed for the Kammerer Road Extension Project project-level Mitigated Negative Declaration, represented a design year of 2044. Consequently, the additional dwelling units that are part of the West and South Study Areas would represent conditions well beyond a 2044 horizon. See Response I-6 for additional details. The analysis for General Plan Update Project is a program-level analysis and includes the units in the West and South Study Areas and no changes to the Draft EIR are required.

Response I-9

The commenter describes improvements required at the I-5/Hood Franklin interchange and mainline I-5 associated with the Kammerer Road Extension portion of the Capital SouthEast Connector Road and timing and funding for these improvements. These comments appear appropriate for that project's project-level Mitigated Negative Declaration and not for the General Plan Update's program-level EIR. That stated, the following information is provided in addressing the broader concerns of the commenter.

As discussed in Response I-5, policies included in the proposed General Plan Update related to transportation improvement funding and coordination with other jurisdictions and agencies demonstrate the City's commitment to contribute to the funding of future transportation improvements.

The separate Kammerer Road Extension project investigates the need for improvements to the I-5/Kammerer Road interchange. As noted in Response I-6, Kammerer Road Extension project, and associated project-level Mitigated Negative Declaration, consider an extension of Kammerer Road based on a 2044 design year. Based upon this analysis, the improvements described by the commenter are not warranted and have not been included in the Kammerer Road Extension project.

4.0 COMMENTS AND RESPONSES

As development occurs and consistent with the General Plan Policies outlined in Response I-6, the City of Elk Grove will collaborate with Caltrans to develop and fund additional improvements needed to accommodate development beyond that incorporated into the 2044 design year forecasts. However, the planning and implementation of needed improvements will occur in response to population and employment growth and as development projects are analyzed in project-level environmental documents.

Overall, this is not a comment on the adequacy of the EIR and no changes to the Draft EIR are required.

Response I-10

The commenter expresses support for the City's efforts related to zero emission vehicles and provides additional information related to zero emission vehicles. This is not a comment on the adequacy of the Draft EIR and no response is required.

Letter J

DELTA PROTECTION COMMISSION

2101 Stone Blvd., Suite 240
West Sacramento, CA 95691
(916) 375-4800 / FAX (916) 376-3962
www.delta.ca.gov



Skip Thomson, Chair
Solano County Board of Supervisors

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Yolo County Board of Supervisors

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CA State Lands Commission

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California State Assembly

Honorable Cathleen Galgiani
California State Senate

September 26, 2018

Christopher Jordan
City of Elk Grove
8401 Laguna Palms Way
Elk Grove, CA 95758

Re: City of Elk Grove General Plan Update Project (SCH# 2017062058)

Dear Mr. Jordan:

Thank you for providing the Delta Protection Commission (Commission) the opportunity to review the Draft Environmental Impact Report (EIR) for the City of Elk Grove General Plan Update Project (Project). The Project involves a comprehensive update of the City's General Plan to ensure that the guiding policy document remains a useful tool, keeps pace with change, and provides workable solutions to current and future issues.

The Commission is a state agency charged with ensuring orderly, balanced conservation and development of Delta land resources and improved flood protection. Proposed local government projects within the Primary Zone of the Legal Delta must be consistent with the Commission's Land Use and Resource Management Plan (LURMP). Portions of the city of Elk Grove border the Primary Zone and are located within the Secondary Zone.

Although the Project does not fall within the Commission's jurisdiction over "development" in the Primary Zone, we submit these comments under Public Resource Code Sections 29770(d) and 5852-5855 (The Great California Delta Trail Act). These sections state that the Commission may comment on projects in the Secondary Zone that impact the Primary Zone, and direct the Commission to develop and adopt a plan and implementation program for a continuous regional recreational corridor extending throughout the five Delta Counties linking to the San Francisco Bay Trail and Sacramento River Trail.

In our previous letter to the City, dated July 25, 2017, regarding the Notice of Preparation for the Draft EIR, we encouraged the City to

J-1

Letter J continued

consider the LURMP and its policies when assessing the General Plan Update's consistency with applicable land use plans, policies, and regulations and to discuss the Delta Trail in the recreation and transportation setting. The Draft EIR states that our comment about the LURMP was addressed in Section 4.0, Land Use, but this section refers only to the Delta Plan, which is developed by another state agency, the Delta Stewardship Council. There is also no discussion of the Delta Trail in Sections 5.11, Public Services and Recreation, and 5.13, Transportation. We renew our request that the City consider the LURMP and its policies and the Delta Trail when preparing the Final EIR.

J-1
cont.

Thank you for the opportunity to provide input. Please contact Blake Roberts, Senior Environmental Planner, at (916) 375-4237 for any questions regarding the comments provided.

Sincerely,



Erik Vink
Executive Director

cc: Don Nottoli, Sacramento County Board of Supervisors and Commission member

Letter J – Erik Vink, Delta Protection Commission

Response J-1:


The commenter states local government projects within the Primary Zone of the Legal Delta must be consistent with the Commission's Land Use and Resource Management Plan (LURMP). The comment notes that portions of the City's border is near the Primary Zone and within the Secondary Zone. As noted in the comment, the proposed General Plan is not within the Primary Zone and would not be subject to the LURMP. Regarding potential effects on the Delta Trail, the General Plan Planning Area does not include the Delta Trail and would have no direct or indirect effects on the trail.

Letter 1

Correspondence #5
Agenda Item No. 6.1
September 20, 2018

To: Christopher Jordan, AICP

CC: Planning Commissioners: Frank Maita, Chair. Mackenzie Wieser, Vice Chair.
George Murphey, Keven Spease, and Andrew Shuck.

From: Shirley Peters, President 
Greater Sheldon Road Estates HOA (GSREHA)
8623 Bamarcia Dr., Elk Grove, CA. 95624
916-682-9243

Date: September 18, 2018

Re: Comments on the draft General Plan and draft Environmental Impact Report.

Perusing both documents, the draft General Plan and the draft EIR, and representing GSREHA, you will find attached, amendments to the language on the page of the referenced documents.

The amendments submitted are the consensus of the GSREHA residents. In addition, this information can be corroborated by the results of the City of Elk Grove Mobility Study.

Letter 1 continued

Please make the following amendments to the language on the pages of the referenced documents below:

1. Draft EG General Plan, Page 7-30

Policy NR-1-9:

Encourage development clustering where it would facilitate on-site protection of woodlands, grasslands, wetlands, stream corridors, scenic areas, or other appropriate features such as active agricultural uses and historic or cultural resources under the following conditions and requirements.

~~Except as provided below, clustering.~~ Clustering shall not be allowed in the Sheldon Rural Area.

- ~~• Urban infrastructure capacity is available for urban use. If clustering is allowed in the Rural Area, those properties shall be exempt from providing urban water and sewer connections in accordance with the policies of the Sheldon/Rural Area Community Plan (see Chapter 9).~~
- On-site resource protection is appropriate and consistent with other General Plan policies.
- The architecture and scale of development are appropriate for and consistent with the intended character of the area.
- Development rights for the open space area are permanently dedicated and appropriate long-term management, with funding in perpetuity, is provided for by a public agency or another appropriate entity

1-1

2. Draft Environmental Impact Report, Page 5.2-17

Policy ~~NR-1-8~~ NR-1-9:

Encourage development clustering where it would facilitate on-site protection of woodlands, grasslands, wetlands, stream corridors, scenic areas, or other appropriate features such as active agricultural uses and historic or cultural resources under the following conditions and requirements. ~~Except as otherwise provided, clustering.~~

Clustering shall not be allowed in the Sheldon Rural Area.

- ~~• Urban infrastructure capacity is available for urban use. If clustering is allowed in the Rural Area, those properties shall be exempt from providing urban water and sewer connections in accordance with the policies of the Sheldon/Rural Area Community Plan (see Chapter 9).~~
- On-site resource protection is appropriate and consistent with other General Plan policies.
- The architecture and scale of development are appropriate for and consistent with the intended character of the area.
- Development rights for the open space area are permanently dedicated and appropriate long-term management, with funding in perpetuity, is provided for by a public agency or another appropriate entity.

1-2

Letter 1 continued

3. Please make the following changes and amendments on page 4-22 of the EG Draft General Plan:

Policy LU-3-7: Residential land uses in Residential Neighborhood

Districts should meet the following guidelines:

- Rural Residential (RR-2) uses should be buffered from higher-intensity uses with Open Space, Community Commercial, or Estate ~~or Low-Density~~ Residential (ER-1)uses.

1-3

Letter 1 – Shirley Peters, Greater Sheldon Road Estates HOA

Response 1-1:

The commenter provides suggested changes to proposed Policy NR-1-9, which addresses development clustering. This change has been incorporated based upon Planning Commission direction during review of the draft General Plan. This is not a comment on the adequacy of the EIR and no changes to the Draft EIR are required.

Response 1-2:

The commenter requests that the Draft EIR be revised to reflect the requested policy language changes for Policy NR-1-9. While the commenter references this policy in the Draft EIR, it is not a comment on the Draft EIR analysis or its conclusions.

Response 1-3:

The commenter also recommends a change to Policy LU-3-7 (Residential land uses in residential neighborhood). The City has not revised this policy as it only relates to the Study Areas and not the Sheldon Rural Area and is consistent with the buffering and transition provisions described under Goal LU-3. No changes are proposed. This is not a comment on the adequacy of the EIR and no changes to the Draft EIR are required.

Letter 2

City of Elk Grove
City Manager's Office
Strategic Initiatives and Long Range Planning
c/o Christopher Jordan AICP
8401 Laguna Palms Way, Elk Grove Ca 95758
cjordan@elkgrovecity.org

September 25, 2018

Regarding: The City of Elk Grove General Plan Update Draft Environmental Impact Report

The DEIR relied heavily upon the 2003 General Plan EIR and did not provide the referenced documents cited or the most current research available. The Final EIR needs to include in the appendix all referenced documents and information.

2-1

The DEIR of the proposed General Plan update has numerous significant and unavoidable impacts which will require findings of overriding considerations

2-2

Aesthetics, Light, and Glare:

1. The General Plan will encourage new development that could degrade the existing visual character or quality of the Planning Area (city). *My suggestion: Enhance Citywide Design Guidelines to stress higher architectural quality of new development consistent with the higher quality cities in the region.*

2-3

2. Implementation of the General Plan will create new sources of daytime glare and nighttime sky glow. *My suggestion: Consider requirement for low pressure sodium lighting for all new development.*

2-4

Agricultural Resources:

3. Development of farmland designated Important Farmland and/or covered under Williamson Act contract. *My suggestion: The loss of farmland is justified if the conversion is to accommodate projected housing needs in the region and Elk Grove should provide its fair-share. However, the FEIR needs to quantify the projected fair-share housing need of the region and acknowledge the growth-inducing policies that may result in Elk Grove providing more than its fair share to the detriment of farmland.*

2-5

Letter 2 continued

Air Quality:

8. The FEIR needs to do a sampling of real time ambient air quality located in Elk Grove between Hwy 99 and I-5 along Elk Grove Blvd.

2-6

Biological Resources:

9. Implementation of the General Plan could have adverse impacts on endangered, threatened, rare plants and animal species. *My comment: No further mitigation beyond state or fed regulations possible. However, the mitigation fee needs to be routinely evaluated as the cost of real estate land purchases increase over time.*

2-7

Greenhouse Gas Emissions and Energy:

10. The City cannot meet the statewide greenhouse reduction targets for 2050. *My comment: Commit to regular updates of the Climate Action Plan and incorporate policies that exceed the minimum required state/federal requirements in order to have a competitive edge in receiving grants.*

2-8

Hydrology and Water Quality:

11. The General Plan policies will increase the demand on water supplies, some of which will be groundwater. *My comment: see Item 15*

2-9

12. The General Plan policies will increase demand for groundwater and could potentially interfere with recharge of the aquifer. *My comment: see Item 15*

Noise:

13. Implementation will result in significant increases in transportation noise along roadways. *My comment: Require noise buffering treatments along the noisiest roadways and incorporate as conditions of project approval as applicable. Budget capital funds to retrofit noise attenuation measures along with grants to improve quality of life along major existing roadways and other noise sources. Adopt state-recognized noise standards and methodology.*

2-10

Public Services and Recreation:

14. Development will result in an increase of school-aged children and require new public school facilities which could have an impact on the environment. *My comment: The school district as Lead Agency will need to evaluate the impacts of all new proposed schools.*

2-11

Letter 2 continued

Public Utilities:

15. Development of the city will increase demand for domestic water supply, which may result in the need for additional water supplies.

My comment: MM5.12.1.1 is inadequate because it only deals with land annexations for which the SCWA would be the retail provider for water service. What is the mitigation measure if SCWA cannot or will not be the retail provider of water? Elk Grove Water District has already gone on record as being interested in serving some of the future Sphere area. MM5.12.1.1 needs to include those requirements for any retail provider of water service. Also, delaying until annexation the proof of water service is too incremental and does not identify the larger water needs of the entire Spheres of Influence. Water infrastructure planning must occur on a more comprehensive basis than deferring until each annexation application. General Plan policies need to include requiring the City to develop a conceptual land use or rezoning of the entire Spheres prior to any annexation request. In addition to identifying the water supply needs, that plan needs to include the required backbone distribution infrastructure needs, estimated costs, and source of funding before any annexation application is entertained.

2-12

16. Development would require construction of new and expanded supply infrastructure which could result in impacts to the physical environment. *My Comment: See #15 above*

Transportation:

17. Development could cause unacceptable level of service conditions at some intersections and roadway segments. *My comment: The proposed General Plan policies have created the significant unavoidable degrees of significance. The FEIR needs to include a Project Alternative that proposes a land use plan that does not exceed the Threshold of Significance for traffic. Overbuilding the city while relying on finds of overriding consideration for traffic is poor public policy. The city has choices.*

2-13

18. Development will exacerbate unacceptable (LOS F) conditions on SR99 and I-5. *My comment: See comment 17 above, and commit to reassessing the I-5 Subregional Impact fee on an annual basis.*

19. Development will increase the VMT. *My comment: Future land use plans/annexation plans need to encourage compact development and appropriate spacing of transit bus bays.*

2-14

The FEIR needs to expand the traffic study hours to include from 3:00pm to 6:00pm. The schools in Elk Grove have different release times and some of the schools begin release at 2:30pm increasing the traffic along the major streets and roadways such as Elk Grove Blvd.

2-15

Letter 2 continued

The FEIR needs to include the Elk Grove City's Citizen Survey as this document includes the modes of transportation and traffic behavior of the residents.

2-16

Safety:

The city of Elk Grove has long ignored the concerns expressed by residents, first responders, as well as Suburban Propane regarding increased density around the two 12 million gallon propane storage tanks.

The Suburban Propane Facility has been identified in many reports by the City of Elk Grove, Sacramento County, and Cosumnes Community Service District as a hazardous waste facility.

2-17a

The City of Elk Grove, Cosumnes Community Service District (CSD), and Sacramento County collaborated on the Local Multi- Hazard Mitigation plan in September 2011. CSD does identify the propane tanks as local hazards in their section of the Plan. This document should be referenced in this DEIR. The updated 2017 Sacramento County Local Multi-Hazard Mitigation plan referencing Suburban Propane needs to be referenced and included in the appendix of the Final EIR.

In May of 2015, CSD hired the firm of City Gate Associates to complete an assessment of services entitled "Technical Report Standards of Cover and Headquarter Services". Volume 2 of the Technical Report Standards of Cover and Headquarter Services Assessment identified the propane tanks as a "high/special risk occupancy". This was defined in the report as: *"Any facility, including without limitation, a structure, infrastructure, property, equipment or service, that if adversely affected during a hazard event may result in severe consequences to public health and safety or interrupt essential services and operations for the community at any time before, during and after the hazard"*. This report described the storage propane tanks as follows: *"Finally the District, just off Highway 99, has the largest propane storage facility west of the Mississippi"*. This document should be referenced in this FEIR.

2-17b

In close proximity to the above propane storage tanks is the City of Elk Grove Household Hazardous Waste Facility. This facility needs to be assessed, identified, and addressed in the FEIR. The City of Elk Grove proposes and plans to expand the facility which will include increase truck transportation increasing the risks to the safety and well-being of the population in event of a natural accident or man-made caused.

2-17c

The Local Multi-Hazardous Mitigation Plan and the 2016 Elk Grove General Plan Safety Element do not address human caused risk such as terrorism. This FEIR should do so.

Department of Homeland Security identified 64 of the highest risk urban areas in the country for possible terrorist attack. Sacramento/Elk Grove were identified in the second highest risk tier of 54 cities. As cited in the Elk Grove Citizen of December 2009 *"The 2009-10 federal Homeland Security Appropriations Bill, signed in late October, included a \$750,000 Federal Emergency Management Agency (FEMA) earmark for an emergency operations center in Elk Grove. The center would be a communications hub used by various agencies to coordinate the response to a large-scale disaster. The funding will also provide for video cameras that would provide views of traffic at major intersections and roadways leading into and out of the city to relieve traffic congestion as well as*

2-17d

Letter 2 continued

"locations determined to be 'sensitive' for the purposes of Homeland Security," according to a January Elk Grove staff report spelling out the city's request for the funding. "It will be a tremendous asset to have in the south Sacramento region in the case of a natural or man-made disaster," Hume said in the statement. In a statement issued by the city, Elk Grove Mayor Pat Hume said the center has been a priority for the Elk Grove City Council. The center will be the only one of its kind in south Sacramento County. The city council discussed a desire for federal funding for an emergency operations center as early as 2005, city records show. Outside agencies such as the city and county of Sacramento, and the California and U.S. Departments of Homeland Security could also be called on to use the center, Frost said."

**2-17d
cont.**

The DEIR does not reference any current research of propane storage tanks as it relates to risks associated with increased population density which have occurred since the city incorporated. The original County land use plan designated the surrounding area as agriculture and industrial. The study does not address the cumulative effects of increased density and consequences of increased traffic congestion should an evacuation be necessary within the urban setting.

Elk Grove Zoning Code states: *"the zoning code is adopted to protect and promote the public health, safety, convenience, prosperity and general welfare of residence and business in Elk Grove"*. In previous land use approvals and decisions the city council has ignored the voiced concerns of residents and Suburban Propane regarding increased densities surrounding the propane tanks and railroad. This is in direct conflict with the "safety" and general welfare of residents and businesses.

2-17e

A February 2015 Report prepared by Northwest Citizen Science Initiative entitled "Portland Propane Terminal" discussed large propane storage facilities within urban areas. This report discussed and referenced the propane tanks located in Elk Grove. The report describes one credible scenario that if the 1999 terrorist plot not been stopped by the FBI, significant loss of life and property damage would have occurred in the immediate area. The report recommends an evacuation zone of at least 2.6 miles based on the collected data and ALOHA source point (NWCSI 3rd revised edition, February 27, 2015).

The FEIR fails to address the population risks associated with increased density within the recommended evacuation area of the propane tanks; fails to identify risk of unplanned terror events; and fails to describe an approved evacuation plan if one exists.

The FEIR in addressing the transport of Hazardous Material neglects to identify and address the nearby railroad tracks. The busy freight lines could be carrying potentially hazardous materials.

2-18

The FEIR is inadequate in addressing potential scenarios involving Suburban Propane, City of Elk Grove Household Hazardous Waste Facility, and the railroad tracks and travel in Elk Grove.

2-19

Letter 2 continued


The DEIR relied heavily upon the previous general plan EIR and did not research or include the most current research or study resources available. The FEIR needs to include or state within the document no other studies or research exists. More importantly for the safety of the community and future residents this FEIR needs to do so as the City of Elk Grove will not proactively approach intentional human caused hazards of terrorism.

2-20

The City of Roseville's 2016 Local Multi-Hazard Mitigation Plan broadly describes the risks associated with "human caused hazards" to include terrorism. The FEIR needs to take a proactive approach to risk assessment because Elk Grove's unique situation of having 24 million gallons of above ground propane storage served by a rail line.

2-21

Sincerely,



Lynn Wheat

Wheat91@yahoo.com

Letter 2 – Lynn Wheat

Response 2-1:

The commenter states the EIR relied heavily on the 2003 General Plan EIR and needs to include all documents referenced in the EIR in appendices to the EIR. The commenter mischaracterizes and overstates the use of the 2003 General Plan Draft EIR for the analysis in the General Plan Update Draft EIR. The analysis in the Draft EIR relied upon many sources of information to characterize existing conditions. While some of topics and/or resource areas described in the 2003 General Plan EIR carried forward to the current Draft EIR, all information was updated to reflect current conditions, to the extent that newer information was available. As explained on page 5.0-1 in Section 5.0, Introduction to the Environmental Analysis and Assumptions Used, the environmental setting conditions are the conditions as they existed when the NOP for the Project was released in June 2017, as required under CEQA Guidelines Section 15125(a). The analysis and conclusions in the General Plan Update Draft EIR were not based on the 2003 General Plan EIR.

CEQA Guidelines Section 15148 (Citation) establishes that “preparation of EIRs is dependent upon information from many sources.... These documents should be cited but not included in the EIR.” The Draft EIR has complied with this requirement. Bibliographic citations for all information relied upon was provided in the References subsection at the end of the technical sections in the Draft EIR. CEQA Guidelines Section 15147 (Technical Detail) provides that appendices may be used for supporting information and analysis, but it does not prescribe or mandate that all documents used in the preparing an EIR should be included in an appendix. The Draft EIR does include in the appendices those documents that include project-specific analysis relevant to the General Plan.

Other than implying the Draft EIR did not use most current research, the commenter did not provide any specific information about topics of concern or identify what current research should have been considered. No further response is possible. No change to the EIR is required as a result of this comment.

Response 2-2:

The commenter notes that significant and unavoidable impacts were identified in the EIR and that a statement of overriding considerations would be required. The commenter is correct. As explained on page 6.0-4 in the Draft EIR, prior to project approval, the City Council will be required to adopt findings of fact and a statement of overriding considerations. This is not a comment on the adequacy of the EIR.

Response 2-3:

The commenter suggests design guidelines to stress higher architectural quality to reduce aesthetic impacts. The Draft EIR evaluated how implementation of the General Plan Update could affect the visual character or quality of the planning area in Impact 5.1.2 in Section 5.1, Aesthetics, Light, and Glare. Aesthetic impacts identified in the Draft EIR are not a result of anticipated low-quality architecture. As noted on Draft EIR page 5.1-9, compliance with the City’s Design Guidelines, supplemental guidelines, and proposed General Plan policies would guide future projects to provide a quality visual character of future development. However, the conversion from the current rural/natural character in the Study Areas to a more urbanized character was considered significant and unavoidable.

Response 2-4:

The commenter suggests a requirement for low pressure sodium lighting for all new development to reduce daytime glare and skyglow. Nighttime lighting impacts were evaluated in Impact 5.1.3 in Section 5.1, *Aesthetics, Light, and Glare*, in the Draft EIR. While low pressure sodium lighting causes low skyglow compared to other types of lighting, it is not appropriate for all applications for a number of reasons (e.g., poor color rendition, resulting in potentially security issues). Thus, a requirement for low pressure sodium lighting for all development would not be appropriate. It should be noted, however, that as part of energy reduction in compliance with greenhouse gas reduction policies, low pressure sodium lighting could be utilized when appropriate.

Response 2-5:

The commenter states the EIR should quantify regional housing needs and acknowledge impacts due to growth-inducing policies that impact farmland. Regional housing needs are developed by the California Department of Housing and Community and development in collaboration with the local Councils of Governments. A determination whether Elk Grove would provide more than its fair share of housing to the detriment of farmland or to justify why farmland should be converted to urban uses is not an environmental impact and is therefore beyond the scope of a CEQA analysis. However, to the extent that implementation of the General Plan would result in the loss of farmland, the Draft EIR provided analysis of farmland loss in Impact 5.2.1 in Section 5.2, *Agricultural Resources*.

Response 2-6:

The commenter states the EIR needs to include real-time air quality sampling in Elk Grove between Highway 99 and I-5 along Elk Grove Boulevard. However, the comment did not include any explanation why those locations should be sampled.

As stated on Page 5.3-5 of the Draft EIR, real-time ambient air quality in the City can be inferred from ambient air quality measurements taken at nearby air quality monitoring stations that are maintained by the Sacramento Metropolitan Air Quality Management District (SMAQMD). To evaluate local ambient air quality concentrations in the Plan Area, measurements for the federal and state standards for ozone were used from the Elk Grove-Bruceville Road Air Quality Monitoring Station, as well as measurements for the federal and state standards for ozone, respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM10), and fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less (PM2.5) were used from the Sacramento-T Street Air Quality Monitoring Station and are summarized in Table 5.3-4. The measurements shown in Table 5.3-4 are considered sufficient to characterize existing ambient air quality within the Plan Area. Ambient concentrations of air pollutants are determined by several factors including climate conditions, meteorological influences on air quality, and the quantity and types of pollutants released. As such, ambient air quality is highly variable. However, as shown in Table 5.3-4, monitoring data substantiates the City of Elk Grove's nonattainment status, as summarized in Table 5.3-3 (i.e., nonattainment for the federal and state standards for ozone, and nonattainment for the state PM10 standards, and nonattainment for the federal PM2.5 standards). As such, the data provided in Table 5.3-4 is sufficient to inform the analysis contained in Chapter 5.3 of the Draft EIR. No changes to the Draft EIR are required in response to this comment.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. CEQA requires adequate and

4.0 COMMENTS AND RESPONSES

complete analysis and a good-faith effort at full disclosure in an EIR, but it does not require “technical perfection” (CEQA Guidelines Section 15003). Additional sampling at other locations in the City would not yield substantially different results for regional pollutants. No additional analysis or revisions to the Draft EIR are necessary as a result of this comment.

Response 2-7:

The commenter references impacts on endangered, threatened, and rare plant and animal species, which were evaluated in Impact 5.4.1 in Section 5.4, Biological Resources, in the Draft EIR. The commenter suggests mitigation fees need to be updated as land costs increase. It is unclear to which fee the commenter is referring; however, where fees are collected as mitigation, such as in certain instances as Swainson's hawk mitigation, those fees are periodically updated to ensure adequate land can be obtained. This is not a comment on the adequacy of the Draft EIR, and no further response is necessary.

Response 2-8:

The commenter suggests regular updates to the Climate Action Plan (CAP) and to include policies that exceed minimum federal and State requirements. This is not a comment on the adequacy of the Draft EIR. The Draft EIR (Impact 5.7.2) acknowledged that even with General Plan Update policies and Climate Action Plan (CAP), the City would likely not be able to achieve sufficient reductions in greenhouse gas (GHG) emissions to meet the long-term goal for 2050 as stated in Executive Order EO S-3-5.

As stated on page 5.7-37 in the Draft EIR, “the City would continue to monitor the status of communitywide [greenhouse gas] GHG emissions over time; monitor and report on progress toward achieving adopted GHG reduction goals through implementation of the General Plan and CAP; and, identify new or modified GHG reduction measures that would achieve longer-term, post-2030 targets...” The City intends to regularly monitor and update the CAP and add or revise measures as new technologies that result in GHG reductions become available, as stated in Chapter 5 of the CAP under Implementation Measures 3 (CAP Implementation and Monitoring) and Implementation Measure 4 (Update GHG Inventory and CAP).

Response 2-9:

The Draft EIR (Impact 5.12.1.1) provided an analysis of the effects of increased demand of future development on water supplies, a portion of which is groundwater. The commenter references a subsequent comment in the letter. See Response 2-12, which addresses water supplies.

Response 2-10:

The commenter recommends requirements for noise treatments along busy roads, retrofitting of existing noise treatments, and adoption of State-recognized standards. Each of these topics is addressed below.

Traffic-related noise impacts were evaluated in Impact 5.10.2 in Section 5.10, Noise, in the Draft EIR. The commenter has correctly stated that, as discussed in Impact 5.10.2, the General Plan Update would result in substantial permanent increases in traffic noise levels in the City and result in a significant and unavoidable impact. The commenter suggests that noise buffering treatments along the noisiest roadways should be incorporated as conditions of project approval. The Draft EIR is a programmatic analysis of all land uses proposed as part of the General Plan Update and does not have detailed information to analyze individual land use

development that could occur in the future. As such, the transportation noise impacts are not attributed to any one development project and, therefore, cannot be mitigated for traffic noise impacts on an individual project basis through conditions of approval as suggested by the commenter. However, as discussed under Impact 5.10.2, the proposed GPU includes several policies that are focused specifically on mitigating potential traffic noise impacts on sensitive receptors from individual land use projects proposed under the Project. Policy N-1.1 states that all new development of the uses listed in Table 8-3 of the GPU shall conform with the noise levels contained in the table and ensure that all indoor and outdoor areas be located, constructed, and/or shielded from noise sources in order to achieve compliance with the City's noise standards. Additionally, Policy N-1.2 requires that where noise mitigation measures are required to achieve the City's proposed noise standards, an emphasis of such measures shall be placed upon site planning and project design. The policy goes on to state that noise barriers shall be considered to mitigate noise impacts as a means of achieving the noise standards only after all other practical design related noise mitigation measures, including the use of distance from noise sources, have been integrated into the project. Policy N-1.5 of the GPU states that where noise-sensitive land uses are proposed in areas exposed to existing or projected exterior noise levels exceeding the levels specified in Table 8-3 or the performance standards of Table 8-4 of the GPU, an acoustical analysis shall be required as part of the environmental review process so that noise mitigation would be included in the project design. Where future projects contribute noise along existing roadways that would exceed standards, project developers may be required to mitigate for the increase in noise. However, as discussed in Impact 5.10.2, the ability to reduce impacts along some roadways with measures such as sound walls or berms may not be feasible.

The commenter suggests that capital funds or grant funds be dedicated to improving the quality of life along major existing roadways. The project is not responsible for improving existing conditions. As supported by Policy N-1.1, N-1.2 and N-1.5 in the proposed GPU, traffic noise impacts from new development projects as part of the GPU will be mitigated to adhere to the City's noise standard, ensuring that sensitive receptors will not be significantly impacted by traffic noise increases from these projects.

With regard to the request to adopt State-recognized standards and methodologies, the City has complied with the applicable requirements for Noise Elements as set forth under State Planning Law (California Government Code Section 65302). Table 8-3 in the General Plan Update (page 8-57), which is reproduced as Table 5.10-8 on page 5.10-23 in the Draft EIR, identifies maximum allowable noise exposure levels from transportation noise sources. The City also has an existing interior noise standard of 45 dB, which is consistent with the State's noise insulation standards in Government Code Section 65302(f)(4)). The methodologies used to establish the City's current standards and proposed standards in the GPU are consistent with the recommended methods for developing a general plan noise element in Appendix D of the State of California's 2017 General Plan Guidelines. The City is using appropriate methodologies and has established noise standards for both transportation and non-transportation noise sources to protect sensitive receptors. The commenter did not provide examples of numerical standards or methods that should have been used instead of those presented in the Draft EIR and why such standards or methods, if applied, would result in a different result than presented in the Draft EIR.

Response 2-11:

The Draft EIR (Impact 5.11.3.1) states that implementation of the General Plan Update would allow for future development that would result in an increase in school-age children, and that construction of new schools could result in environmental impacts. The commenter states that

4.0 COMMENTS AND RESPONSES

the school district, as lead agency, would be required to evaluate impacts of any new schools. This information is presented on Draft EIR page 5.11-13. The comment does not raise any issues regarding the adequacy of the analysis in the Draft EIR, and no further response is necessary.

Response 2-12:

The commenter states mitigation measure MM 5.12.1.1 is not adequate because it only applies to the Sacramento County Water Agency (SCWA). The Draft EIR (Impact 5.12.1.1) provided an analysis of the effects of increased demand of future development on water supplies, a portion of which is groundwater, and analysis of impacts on water supply infrastructure (Impact 5.12.1.2). While it is anticipated that SCWA would be the likely water service provider in the Study Areas, another agency could provide water in these areas. This assumption is based upon the fact that the East Study Area is already within the boundaries of SCWA's Zone 40 service area; for the West and South Study Areas SCWA is the service provider directly to the north and it would be a logical and orderly action to extend their service to the south. For the North Study Area, the draft General Plan identifies future uses at a minimum of two gross acres in size, allowing for private well services; therefore, a public water provider is not required.

That said, the comment does identify an opportunity to provide flexibility for future conditions. Therefore, mitigation measure MM 5.12.1.1 is amended below. The General Plan calls for any development within a Study Area to be comprehensively planned, which would include infrastructure planning. In addition, proposed General Plan Policy LU-3-26 has been amended to require that, at the time of annexation, the Groundwater Sustainability Plan, as applicable, and the applicable water purveyor's water master plan(s) identify available water supply for the annexation project.

MM 5.12.1.1 Prior to LAFCo approval of annexation of any portion of the Planning Area into the City of Elk Grove ~~for which the SCWA would be the retail provider for water service~~, the City must prepare the Plan for Services to allow LAFCo to determine that: (1) the requirement for timely water availability, as required by law, is met; (2) its water purveyor is a signatory to the Water Forum Successor Effort and that groundwater will be provided in a manner that ensures no overdraft will occur, (3) the amount of water provided will be consistent with the geographical extent of the annexation territory; and (4) existing water customers will not be adversely affected. The Plan for Services shall be sufficient for LAFCo to determine timely water availability to the affected territory pursuant to Government Code Section 56668, subdivision (l), or its successor.

The Plan for Services shall demonstrate that the ~~SCWA~~ water supplies are adequate to serve the amount of development identified in the annexation territory, in addition to existing and planned development under normal, single-dry, and multiple-dry years. The Plan for Services shall depict the locations and approximate sizes of all on-site water system facilities to accommodate the amount of development identified for the specific annexation territory; demonstrate that the service provider ~~SCWA~~ has annexed the territory into its service area; and demonstrate that adequate ~~SCWA~~ off-site water facilities are available to accommodate the development identified in the annexation territory, or that fair-share funding will be provided for the construction of new or expanded treatment and/conveyance facilities and/or improvement of existing off-site water system facilities with no adverse fiscal impacts on existing ratepayers.

Response 2-13:

Traffic level of service impacts were evaluated in Impact 5.13.1 and Impact 5.13.2 in Section 5.13, Transportation, which concluded that there is no feasible mitigation beyond General Plan Update policies that would reduce impacts to less than significant for certain roadways and intersections. The commenter requests evaluation of an alternative that would not result in significant traffic impacts. The Draft EIR evaluated a No Project Alternative, which would allow only development in the current Planning Area. However, as shown in Draft EIR Table 5.13-7, there are intersections that operate at unacceptable levels under current conditions; trips added by development within the current Planning Area boundaries would exacerbate the unacceptable conditions and could result in impacts at intersections that currently operate at acceptable levels.

Section 15126.6 of the CEQA Guidelines establishes the requirements for an alternatives analysis. An EIR is not required to consider alternatives that are infeasible. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The alternative suggested by the commenter would not meet any of the project objectives and for the reasons explained above, an alternative that would not result in any traffic impacts would not be a feasible alternative requiring detailed evaluation in the Draft EIR.

Response 2-14:

The commenter states future development should encourage compact development and transit. Policies in the proposed General Plan Update encourage compact development and greater use of transit, and the Draft EIR evaluated the relationship between vehicle miles traveled (VMT) and compact development. As explained on Draft EIR pages 5.13-53 to 5.13-54, the City recognizes that VMT reductions may be achieved through the implementation of individual development projects as the General Plan is implemented and has proposed General Plan Policy MOB-1-1 that provides VMT metrics to guide new development that require development projects to demonstrate a 15 percent reduction in VMT from existing (2015) conditions. Policy MOB-1-1 includes VMT per service population metrics by land use category, VMT limits for development in the existing City, and VMT limits for Study Areas. To support the VMT reductions incorporated into Policy MOB-1-1, the General Plan includes policies to support development of complete streets (MOB-3-1 through MOB-3-9), mobility for all system users (MOB-3-10 through MOB-3-13), managed parking supply (MOB-3-14 through MOB-3-17), improvements to the bicycle and pedestrian network (MOB-4-1 through MOB-4-3), transportation demand management (MOB-4-4 through MOB-4-5), and transit (MOB-5-1 through MOB-5-10).

Response 2-15:

The commenter requests the traffic study expand the hours to include school release times. The traffic study is not intended to provide a comprehensive analysis of every road segment and intersection in the City, but it is a programmatic analysis that discloses the magnitude of the increase in traffic Citywide. The traffic study utilized the typical approach to traffic impact analysis, which analyzes A.M. and P.M. peak hours. While there could be localized congestion near schools during school release times, background traffic during peak hours would be generally higher than school release hours. As such, the magnitude of impacts disclosed for peak hour traffic would exceed after school traffic. Nonetheless, as future projects are proposed, project-specific traffic studies would be prepared that would consider local conditions, such as the proximity to schools.

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Response 2-16:

The commenter requests that the Elk Grove Citizen's Survey be added to the EIR. The comment does not state how the survey relates to environmental impacts disclosed in the EIR or the conclusions of the impact analysis.

Response 2-17a:

This comment raises several issues related to the Suburban Propane facility and potential safety hazards associated with the facility. The commenter is of the opinion the City has long ignored concerns expressed by residents, first responders, and Suburban Propane regarding increased density around the two 12-million-gallon storage tanks. The comment contains several inaccuracies and mischaracterizations about the facility and relevant emergency planning documents, which are addressed below.

The commenter states that the Suburban Propane Facility is a "hazardous waste facility." This is incorrect. As described on pages 5.8-1 to 5.8-2 in Section 5.8, Hazards and Hazardous Materials, in the Draft EIR, the Suburban Propane facility receives propane from tank trucks and railcars and stores ambient temperature and refrigerated liquid propane. The propane is subsequently loaded onto trucks or railcars and transported off-site for delivery. The stored propane is not a hazardous waste, nor are there any processes involved in the handling of propane at the facility that generate hazardous waste.

The commenter references a "Local Multi-Hazard Mitigation Plan" from 2011 and an "updated 2017" plan and states that the City, Cosumnes Community Service District (CCSD), and Sacramento County collaborated on the plan, and that the plan should be referenced in the Draft EIR. The Draft EIR (page 5.8-13) referenced the most current version of the plan, entitled *Local Hazard Mitigation Plan Update* (LHMP) and summarized the contents of the plan. Although the Sacramento County website, where the plan can be found, refers to a "2017 Update" and a "2017 LHMP Report," the document that is found by clicking on the website link is dated 2016. A bibliographic citation for the 2016 LHMP document was provided on page 5.8-26 in the Draft EIR.

As the commenter correctly notes, the LHMP does acknowledge the Suburban Propane facility. The facility is included as a Hazardous Materials Facility in Table 4-42 "Sacramento County Planning Area – Critical Facilities Inventory" in the Table B-11 "City of Elk Grove – Critical Facilities Inventory" in the Elk Grove Annex B-11 to the LHMP and in Table H-5 "CFD Critical Facilities: Summary Table" in the LHMP. These documents are readily available to the public at: <http://www.waterresources.saccounty.net/stormready/Pages/Local-Hazard-Mitigation-Report.aspx>, and do not need to be included as an appendix to the EIR.

No changes to the Draft EIR are necessary as a result of this comment.

Response 2-17b:

The commenter states a report prepared by "City Gate Associates," which states the Suburban Propane tanks are "high/special risk occupancy," should be referenced in the EIR. The comment includes excerpts from the document entitled *Standards of Cover and Headquarters Services Assessment for the Cosumnes CSD Fire Department" Volume 2 of 3 – Technical Report* dated May 2015 and prepared by Citygate Associates. City staff reviewed the report. As stated on page 2 of that document, the report provides technical information about how fire services are provided and regulated and how the CSD's Fire Department currently operates relative to applicable performance standards. The quoted material from the report is correct; however, the

Information about hazardous materials provided on page 104, which includes Suburban Propane, is of a general nature and provides a context for the report's assessment of hazardous materials operations citywide. It does not assess the risk of potential releases or emergency response specific to the Suburban Propane operations.

The report's description on page 104 that the propane facility is "the largest propane storage facility west of the Mississippi" is similar to a statement on page 5.8-1 in the Draft EIR, which states that the propane facility is one of the largest aboveground propane storage facilities in the United States.

The information in the Citygate Associates document does not include any new information regarding the Suburban Propane facility that contradicts or differs from that presented in the Draft EIR. No changes to the Draft EIR are necessary as a result of this comment.

Response 2-17c:

The commenter states the EIR should identify, assess, and address the "City of Elk Grove Household Hazardous Waste Facility" in the EIR. The Special Waste Collection Center program provided by the City of Elk Grove helps residents dispose/recycle their residential and business hazardous waste properly. Elk Grove residents and participating jurisdictions may drop off a full range of household hazardous waste (HHW) at its Special Waste Collection Center. All waste collected is either reused, recycled, processed for energy recovery, or stabilized for proper disposal to achieve zero waste being landfilled. Facility operations are regulated by the Sacramento County Environmental Management Department, which is responsible for ensuring the collection center complies with federal and state hazardous waste laws and regulations. Implementation of the proposed General Plan Update would not affect facility operations. Expansion of the HHW Facility is not a component of the proposed Project and therefore does not require analysis in the EIR.

Response 2-17d:

The commenter states that neither the 2016 LHMP nor Elk Grove General Plan Safety Element address human-caused risk such as terrorism and that the EIR should address this topic. This comment is of a general nature. The commenter is correct that the 2016 LHMP does not address terrorism, but the comment is incorrect about the General Plan Update. Goal EM-1 (Coordinated Disaster and Emergency Management) on page 8-8 in the Services, Health and Safety Element states that there are several potential safety hazards in Elk Grove, including potential targets of terrorism, among others.

The comment also includes a quotation from a 2009 *Elk Grove Citizen* article entitled "Homeland Security Funding to Support City Emergency Communications Center."¹ City staff reviewed the article. The article described how funds could be used to develop an emergency operations center in Elk Grove. It does not address the Suburban Propane facility or provide any information that is relevant to the analysis in the Draft EIR.

¹ Available at: http://www.egcitizen.com/news/homeland-security-funding-to-support-city-emergency-communications-center/article_604a1fb7-4a5f-5267-ad90-d57752300382.html

4.0 COMMENTS AND RESPONSES

The purpose of the EIR is to evaluate the physical effects of a project on the environment, not to ascertain how illegal activities by others would affect the environment. No changes to the Draft EIR are necessary as a result of this comment.

Response 2-17e:

The commenter states the Draft EIR does not reference any current research of propane storage tanks relative to risks with increased population density since City incorporation, or the cumulative effects of increased density and consequences of increased traffic congestion should an evacuation be necessary. The commenter is of the opinion the City has ignored concerns of residents and Suburban Propane and that this conflicts with the Zoning Code. This is a comment about City policy and land use decisions, in general, which is not subject to review under CEQA.

Under CEQA, an EIR is not required to determine whether an existing condition requires mitigation, but an EIR is required to describe environmental conditions as they exist at the time the NOP is published. The Draft EIR has complied with this requirement by including information about the Suburban Propane tank facility and potential risks associated with a hazardous materials release at that facility, which were presented in the Draft EIR on pages 5.8-1 and 5.8-2.

City staff reviewed the article referenced by the commenter "Portland Propane Terminal" prepared by Northwest Citizen Science Initiative in 2015. As support for its assertions regarding potential safety hazards at the Portland facility, the article includes information about the Suburban Propane operations and an analysis using a computer model to predict radiant-heat threat zones from a vapor explosion that may have occurred if a terrorist plot in 1999 to blow up the tanks was not foiled. The article does not predict the risk of occurrence.

The Draft EIR (page 5.8-2) summarized the results of a risk evaluation prepared in 2003 that assessed how a release of propane, either by accident or by intentional act, could affect surrounding areas. The analysis considered a flash fire scenario as well as a vapor cloud explosion. The evaluation also assessed the probability of such occurrences.

The presence of the Suburban Propane tank facility is an existing condition. As explained on page 5.8-17, the potential for an accidental or intentional event resulting in either a vapor cloud or a flash fire is not substantial. Because the Suburban Propane facility is not operated by the City and the proposed Project would not involve any changes in facility operations, the potential for a catastrophic event and its effects on surrounding land activity types would not be exacerbated by the Project. In addition, as discussed on page 5.0-2 in Section 5.0, Introduction to the Environmental Analysis, the effect of this existing condition would be an impact of the environment on the Project, and, as such, is not a CEQA consideration, and therefore not subject to further analysis in this EIR. The 2015 article cited by the commenter was not prepared solely to evaluate the Suburban Propane facility. Although the 2015 article is newer than information reported in the Draft EIR, it is not significant new information, as defined in CEQA Guidelines Section 15088.5, because analysis of the information would not result in a new significant environmental impact and it would not increase the severity of an impact because none was identified.

Future decisions to be made by the City where new land uses should be sited relative to the Suburban Propane facility will be guided by policies in the General Plan. Those policies, which include EM-1-1 and ER-1-1 through ER-1-3 are listed on pages 5.8-14 and 5.8-15 in the Draft EIR. Specifically, Policy ER-1-3 establishes that the City shall consider specific thresholds of exposure

when determining whether to approve a project that would place a use near an existing hazardous facility that could expose the new use to hazardous physical effects.

The Draft EIR also described evacuation plans and their implementation. Specifically, on page 5.8-22, the Draft EIR stated Sacramento County's Evacuation Plan identifies key evacuation routes as major interstates, highways, and major roadways. The plan indicates that specific evacuation routes would be established for individual situations based on the geographical location and magnitude of the emergency, as well as the time of day and day of the week. During an evacuation, County Department of Transportation staff would calculate traffic flow capacity and decide which of the available traffic routes should be used to move people in the correct directions. Other than speculating traffic congestion could affect evacuation routes, the commenter did not provide any data or analysis that contradicts the conclusions of the Draft EIR on this topic.

For the reasons described in Response 2-17d, above, and as explained in this response, the Draft EIR has adequately considered the risk posed by the Suburban Propane facility and fully complies with the requirements of CEQA. No revisions to the Draft EIR are necessary as a result of this comment.

Response 2-18:

The commenter states the EIR fails to address transportation of hazardous materials on nearby railroad tracks. The commenter is incorrect. Moreover, as stated on page 5.0-2 in Section 5.0, Introduction to the Environmental Analysis and Assumptions Used, agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents. CEQA does not prohibit an agency from considering as part of an environmental review how existing conditions might impact a project's future users or residents, but does not require mitigation for these effects.

Transportation of hazardous materials, including on railroad lines, is described in Section 5.8, Hazardous Materials, on page 5.8-4. Potential impacts associated with rail transport were identified in Impact 5.8.1. Policies in the General Plan Update (e.g., MOB-6-2) require City coordination with Union Pacific Railroad to ensure freight rail lines and crossings are maintained. See also Response A-1.

Response 2-19:

The commenter states the EIR is inadequate in addressing potential scenarios involving Suburban Propane, City of Elk Grove Household Hazardous Waste Facility, and the railroad tracks and travel in the City. The analysis in the Draft EIR on these topics adequately evaluates impacts in accordance with CEQA requirements and case law. See Responses 2-17a through 2-17e regarding Suburban Propane and the City's HHW facility, and Response 2-18 regarding hazardous materials transportation on rail lines.

Response 2-20:

The commenter reiterates previous comments. See Response 2-1 regarding information used to prepare the EIR analysis and Response 2-17e.

4.0 COMMENTS AND RESPONSES

Response 2-21:

The commenter states the EIR should take a proactive approach to risk assessment because of the Suburban Propane tanks with a rail line and the risk of terrorism, citing the City of Roseville's LHMP as an example of how the risk should be addressed. The Draft EIR has fully complied with the requirements of CEQA as it pertains to disclosing potential risks associated with a hazardous materials release from the Suburban Propane facility. See Responses 2-17a through e.

Letter 3



PO Box 1526 Sacramento, CA 95812
(916) 444-0022

September 26th, 2018

City of Elk Grove
Attn: Christopher Jordan, AICP, Director of Strategic Planning and Innovation
8401 Laguna Palms Way
Elk Grove, CA 95758
email: cjordan@elkgrovecity.org

RE: Elk Grove General Plan Update and DEIR, and the prospect of future expansion

Dear Mr. Jordan,

This letter provides comment from the Environmental Council of Sacramento (ECOS) and Habitat 2020 regarding the City of Elk Grove’s General Plan update and corresponding Draft Environmental Impact Report (DEIR).

The Environmental Council of Sacramento (ECOS), a 501c3 organization, and Habitat 2020, the Conservation Committee of ECOS, are partner coalitions dedicated to protecting the natural resources and communities of the greater Sacramento region. ECOS-Habitat 2020 member organizations include: 350 Sacramento, Breathe California of Sacramento-Emigrant Trails, International Dark-Sky Association, Los Rios College Federation of Teachers, Mutual Housing California, Physicians for Social Responsibility Sacramento Chapter, Preservation Sacramento, Resources for Independent Living, Sacramento Housing Alliance, Sacramento Natural Foods Co-op, Sacramento Vegetarian Society, SEIU Local 1000, Sierra Club Sacramento Group, The Green Democratic Club of Sacramento, and the Wellstone Progressive Democrats of Sacramento, 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.

3-1

Summary

Following ECOS and Habitat 2020s’ opposition to the recently adopted Kamerrer-99 Sphere of Influence Expansion, ECOS and Habitat 2020 are primarily concerned with the “study areas” for further expansion proposed in this General Plan Update. Elk Grove’s anticipated growth can be accommodated within the existing City limits, and we find no justification for expansion beyond the Sacramento County Urban Services Boundary (USB) established in 1993 to be the ultimate growth boundary within the County. The

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Letter 3 continued

proposal is inconsistent with the Sacramento Area Council of Governments' (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) for meeting State mandated greenhouse gas (GHG) reductions, Federal mandates for Air Quality Attainment under the State Improvement Plan (SIP), as well as myriad regional goals for social equity, public health and natural resource conservation. There is an extreme lack of certainty that municipal water can be provided to this area without severe regional impacts, and the impacts to invaluable agricultural and biological resources by the proposal are potentially impossible to mitigate.

The justification given for study of further expansion is the need for Elk Grove to correct its job's housing balance. This is a goal that ECOS agrees with, but, again, the housing and employment that Elk Grove anticipates achieving from existing planning areas within the current City boundaries already far exceed that of SACOG'S projections for Elk Grove by 2040. If Elk Grove were to achieve these housing and employment projections in the SOIA as well, it would certainly have impacts on housing and employment in neighboring jurisdictions in the region.

While these proposed expansion areas are only "study areas," it is irresponsible of the City to signal intent for growth that is so divergent from the regional plan, and where the cumulative impacts to the region would be so great.

Land Use, Transportation, Air Quality, and Climate Change

The proposed study areas for further expansion are inconsistent with SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy, and in direct opposition to the intent of the State, Federal and regional goals that are represented in that collaboratively designed regional plan. The MTP/SCS represents the best regionally-cumulative analysis available in providing the most viable strategy for allocating urban growth and transportation infrastructure needs across our 28 jurisdictions while meeting State mandated greenhouse gas (GHG) reductions, and Federal mandates for Air Quality Attainment under the State Improvement Plan (SIP).

The joint MTP/SCS is the mandated product of the Sustainable Communities and Climate Protection Act of 2008 (CA SB 375), which mandates that a land use strategy be developed in tandem with the federally required regional transportation plan in an effort to reduce GHG emission from the light vehicle sector. These GHG reductions found through the nexus of land use and transportation are largely represented by reductions in Vehicle Miles Travelled (VMT), by reducing travel distance between jobs, housing and services through more compact development and increased investment and access to non-automobile modes of travel. More compact land use and increased options for traveling (through transit, walking and biking) simultaneously offer significant benefits to public health and social equitable housing, and preserves our natural and working lands, as well as associated biodiversity and ecosystem services such as carbon sequestration, flood abatement, and groundwater recharge.

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Letter 3 continued

Considering all of the benefits the MTP/SCS strategy provides, deviation from the plan cannot be taken lightly. Both the State mandated GHG reduction targets and the federal air quality attainment requirements were extremely difficult for SACOG to achieve in the recent 2016 MTP/SCS update *and these reduction targets were strengthened in 2018*. SACOG's projected growth footprint will in turn be even more compact in 2020. Any deviation from the plan, particularly in urban expansion outside of the SCS footprint, would pose a significant challenge for any future ability of the region to achieve these requirements—the consequences of which would include loss or withdrawal of substantial Federal and State infrastructure funding.

Considering that there is no wiggle room in the current strategy, the only way the MTP/SCS could accommodate expansion of Elk Grove (or any jurisdiction) beyond the SCS footprint and still meet State and Federal requirements would be to take growth away from all the other jurisdictions in the region.

The California Air Resources Board (CARB) has finalized the GHG Scoping Plan Update in 2018, finding that GHG reductions from other sectors including energy production, energy efficiency, clean fuels, and clean vehicles will not achieve California's 2050 goals alone--that we need 15% more VMT reduction through improved land use and transportation strategies *beyond* what our current regional plans project to achieve.

The region needs to reduce VMT significantly. The primary mechanism by which to do this is to reduce outward urban expansion and increase densities within existing urbanized areas.

SACOG growth projections for Elk Grove (in total) for the next 20 years is 12,790 houses, and 14,760 jobs (SACOG 2020 MTP/SCS Draft Growth Forecast, June 8, 2018 Staff Report). All of SACOG's anticipated housing growth can easily be accommodated within vacant land of existing communities and new developments already being planned in new development areas of the existing City, including Laguna Ridge, Lent Ranch, and the Southeast Planning Area (SEPA).

Elk Grove has repeatedly made the claim that it must expand to focus on job centers that will correct its greatly imbalanced jobs-housing ratio. This is a worthy goal, but again, this can be done within the existing City limits. The Southeast planning area alone, by Elk Grove's projection, will accommodate more than 20,000 jobs far more than what SACOG projects as feasible in the next 20+ years.

We believe that the job growth aspirations of the City are unrealistic, and that, as has been observed time and again in Elk Grove, this land will end up being low-density housing with little nearby job opportunity. But if we were to presume that Elk Grove did attract this extreme number of jobs, a significant amount of them would almost necessarily be drawn from other jurisdictions in the region—what would be the cumulative economic effect of that potentiality?

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Letter 3 continued

Looking at this potential growth through a regional lens should be the foremost priority for Elk Grove and all jurisdictions in the region. If the peripheral expansion that Elk Grove seeks were to proceed, it would make it almost impossible for the region to achieve our State VMT/GHG reductions and Federal air quality mandates.

**3-2
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Elk Grove's jobs-housing imbalance is a correctable problem of the City's own making, and it can and should be corrected within the existing footprint (and the regional plan) before expansion is considered at the expense of the region and the Public Trust.

Hydrology and Water Quality

The document proposes to remove agricultural lands in the form of several Study areas; annex these Study areas from the County to the City of Elk Grove; and develop them into a mixture of uses with residential being the primary use. The City is unable to certify that water supplies can be provided for the Study areas. In addition, the Study areas appear to border the riparian habitat areas and water course of the Cosumnes River and its associated streams and creeks. As such a general case can be made that the lands in question are better served if they remain designated as agricultural and, as such continue to recharge the Sacramento Central Basin. The Cosumnes River basin is a GDE and groundwater levels below it do not adequately support the river or its immediate habitat. Additionally, as excess storm water from the American River network becomes available for recharge, one or more of the study areas may be candidate recharge areas.

3-3

Section 5.9, page 5.9.18 references California's Sustainable Groundwater Management Act (SGMA) and documents prepared by the Sacramento Central Groundwater Authority. However, the document does not refer to the importance of the Cosumnes River basin as a series of Groundwater Dependent Ecosystems (GDE or ecological communities of dependent species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface). The Cosumnes River has been disconnected from its underlying aquifer by years of groundwater pumping and diversion. This groundwater level disconnection is well-understood and includes impacts on the timing of the re-connection of flows of the Cosumnes River, which affects salmon migration; impacts on other important groundwater dependent ecosystems such as riparian forests and the species that depend on them; and, impacts on a wide range of other beneficial uses.

3-4

SCMA refers to the need for Management Areas where GDEs are present and are negatively impacted because of the lack of surface water that is normally connected to a continuous saturated zone of the underlying aquifer. This project will require additional groundwater extraction. Further demand for groundwater in the Southwestern and Southern portions of the Sacramento Central Groundwater Basin, as well as, along the River's water course, will exacerbate this problem and potentially negate current in lieu and groundwater recharge projects being implemented to partially address it.

Section 5.9, page 5-9-18 makes selective use of some of the Sacramento Central Groundwater Authority (SCGA) information contained in its 'Alternative Plan' and

Letter 3 continued

Annual Report to present a positive picture regarding the status of Central Sub Basin and its ability to provide groundwater supplies for the City's potential project. While the basin's storage has increased in aggregate since 2005 it is important to note that there have been several years of negative storage. For example, during 2014 the storage level was 110,000-acre feet below the 2005 storage level.

The basin is susceptible to the impacts of climate change. Climate scientists project an increase in both the frequency and severity of droughts in our region. The potential impacts on aquifer recharge and the availability of groundwater to meet future demands under these conditions are not yet known.

The ability of the Cosumnes river basin to effectively recharge to provide the needed connection between the aquifer and the river's surface water, as well as maintain the groundwater at levels sufficient to provide for the riparian habitats within the GDE has not been demonstrated by SCGA. Recent spring monitoring data does show that after two wet years the Cosumnes River has seen some recharge and that spring well levels have improved over levels seen in 2005 and during the drought. However, aquifer water levels are still well below the tree root zones of the riparian forests for most of the 24 miles of river course through the Sacramento Central Groundwater Basin. Without additional recharge efforts it is highly uncertain that the Cosumnes River basin and its GDE will be recovered. Additional groundwater extraction to supply water for the City's project could exacerbate the basin's long-term health.

The EIR also makes assertions that the development of the study areas may actually increase the amount of recharge that occurs. This statement is unsupported. Recent studies indicate typical undeveloped or fallow fields in the region can recharge up to 3-acre feet, per acre, per year. It is hard to believe that a residential development with all its hardscape will provide the same recharge potential even if storm water is treated and becomes part of the in-lieu recharge program. Also, unless the recharge occurs in the same riparian areas that will be impacted by the loss of natural recharge, the benefits may not be equivalent.

Impact 5.9.4 states that the City's proposed project increases demand for water supplies, some of which would be provided from groundwater sources. This impact is described as 'Potentially Significant'. The EIR goes on to state the project could contribute to conditions affecting aquifer volume or groundwater levels, and that the City has no authority to effectuate additional supplies. The EIR states that Sacramento County Water Agency cannot consistently provide sufficient water supplies in 2020 and 2025 in all conditions.

This finding is understated. It is unconscionable to propose a new growth area when the water supply purveyor asserts that it cannot provide adequate supplies in drought conditions. The City knows full well that this Region experiences periodic droughts, and that climate scientists are projecting more significant and frequent droughts for the State in the years to come.

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Letter 3 continued

Impact 5.9.7 states the project areas, in combination with other development in the Central Basin would increase groundwater demand and potentially interfere with the recharge of the aquifer. This impact is described as 'Potentially Cumulatively Considerable'. The document goes on to state that there is no mitigation possible by the City.

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Again, this finding is understated for the same reasons discussed in response to 5.9.4. The Project should be rejected on the basis of insufficient water supply; the impacts it would have on the region's water supplies; and the impacts it would have on the Cosumnes River and its water course.

Biological Resources

The impact of increased land values on the SSHCP and other conservation efforts was not analyzed

The inclusion of the West and South Study Areas in the General Plan Update inflates land prices in those areas significantly above what typical values would be for agricultural lands in the region. This price inflation directly affects the ability of the SSHCP or any other conservation effort to purchase those lands. This is an environmental impact and it was not discussed and analyzed

3-5

The importance of the Environmental Setting for the Study Area was not fully explicated

The proximity of the Cosumnes River Preserve to the south and Stone Lakes National Wildlife refuge to the west confers to the Study Areas added biological significance as a foraging area for many species that roost or nest in those preserved landscapes. What the DEIR lacks is a description that attempts to encompass the significant geographical and biological relationship between the Study Areas and the lands of the Stone Lakes National Wildlife Refuge (SLNWR) and the Cosumnes River Preserve (CRP). In this context, the Study Areas represent extremely important foraging areas and wildlife movement corridors for species from both SLNWR and CRP. As well, the Study Areas act as very important buffers to absorb direct and indirect impacts from urban activities. The removal of any part of this important foraging, wildlife movement, and buffering area will have demonstrable impacts on both SLNWR and CRP. These are not analyzed or considered. The important species survey data collected in both of these important protected areas does not even seem to have been utilized to determine the presence of listed species in the Study Areas either.

3-6

Add to this the fact that the Cosumnes River is the last remaining free flowing river out of the West side of the Sierra Nevada Mountains and that CRP and SLNWR are active floodplains that inundate cyclically every seven to ten years. Since much of the conservation in this area is within an active floodplain, upland foraging lands become critical. The West and South Study Areas are such upland foraging areas and as such are

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Letter 3 continued

extremely important during the cyclical inundations mentioned. This was not analyzed or even mentioned.

And further, given the relative elevations of the Cosumnes River Preserve, Stone Lakes National Wildlife Refuge, and the Study Areas, even further significance is conferred because beyond the cyclical flooding that is inherent in the Cosumnes River Preserve, there is the prospect of habitat loss to the entire of the north Delta due to global climate change and sea level rise – both topics covered in more detail elsewhere in this comment letter.

Cyclical Flooding and Sea Level Rise Are Major Gaps in the Biological Resource Analysis

The biological resource analysis fails to consider cyclical flooding of the lower Cosumnes River Basin, the impact of sea level rise on the north Delta, and the effect of both on the Greater Sandhill Crane and the lesser sandhill crane, as well as all other species who share same habitats. Together they comprise a major gap in the analysis.

The Study Areas lay just north of the Cosumnes River flood plain, which is active and is inundated periodically. The Cosumnes River is the only undammed river flowing out of the west side of the Sierra Nevada Mountains, and due to past levee breaches, intentional and unintentional, the river actively floods the lower Cosumnes River basin on a cyclical basis. Severe flooding has occurred on average every seven to ten years. Recent significant flood events have occurred in 1997, 2005-2006, and 2015-2016. Similarly, Stone Lakes National Wildlife Refuge, both in the actual Refuge and within the legislative boundaries of the Refuge, has many low elevation areas that are also subject to flooding.

Historically, the Study Areas area have provided critical upland foraging habitat for the Greater Sandhill Crane during the frequent flood events in the lower Cosumnes basin. Dr. John Trochet worked for the Nature Conservancy and Gary Ivey in 2005 between January and March and documented Greater Sandhill Crane usage of agricultural lands either in the immediate vicinity of the SOIA area during a flood event (Ivey, “Mitigating Loss of Sandhill Crane Habitat in South Sacramento County, March 25, 2005). Though it has been acknowledged that significant portions of the lands in and around the Stone Lakes National Wildlife Refuge that were added to the “inventory” of the SSHCP are at or below sea level, no investigation or scientific determination has been made as to the impact of the removal of upland foraging habitat for the Greater Sandhill Crane, given its importance during flood episodes. Most of the preservation of sandhill crane habitat has been within the floodplain, and significant areas that are not technically within the floodplain, such as Staten Island, are at risk of catastrophic failure during significant flood events if their antiquated levees fail – this nearly happened to the Staten Island levees during the 2005-6 flood event and it was only emergency repairs that kept it from becoming a lake. A significant flood episode with inadequate upland foraging habitat remaining could have catastrophic consequences for the Greater Sandhill Crane.

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Letter 3 continued

Similarly, other listed and species of concern would also be impacted. This was not discussed or analyzed in the DEIR.

Beyond the cyclical flooding, global climate change and the resultant rise in sea level poses additional risks to low lying areas in the lower Cosumnes basin, Stone Lakes National Wildlife Refuge, and the entirety of the Delta. Dr. Rod Kelsey at the Nature Conservancy has done some preliminary modeling in the north Delta as part of TNC's participation in the Crane Technical Advisory Committee (a committee, formed in 2015 which includes representatives from CDFW, USFWS, DWR and the Nature Conservancy, as well as preserve managers, scientists and environmentalists, that is working on a sandhill crane conservation strategy for California) and as an exercise to refine TNC's own land acquisition priorities for sandhill crane conservation. The modeling exercise looked at conservative sea level rise predictions for between now and 2100 for the Delta and surrounding landscapes. The initial draft maps that resulted from this exercise are attached. The maps are undergoing refinement to also consider relative crane abundance, but these draft maps are still useful in demonstrating the concerns about sea level rise and the potential threats to sandhill cranes, as well as all of the other terrestrial wildlife that reside in or near the north Delta.

The first map (figure 1) depicts current high value crane habitat based on suitable ground cover-type and distance from established roost sites (within a 2-mile diameter of established site). This draft map has yet to be adjusted for relative abundance of cranes, which would increase the priority of available habitat close to roost sites with greater numbers of cranes. The second map (figure 2) depicts the areas that are at risk of permanent inundation based on conservative sea level rise predictions, relative existing elevations, and potential for levee failure. Virtually all of the lands currently conserved for Greater Sandhill Cranes are at risk of being lost. This realization has resulted in the need to rethink long term conservation strategies for sandhill cranes in the Delta and its surrounding landscapes, not to mention all of the other listed and special concern species that share the same landscapes. The third map (figure 3) attempts to depict how conservation priorities need to shift to address the threat of sea level rise. It attempts to balance the importance of habitat near historic roost sites with the need to shift populations to the east where there is higher elevation and thus more sustainable long-term habitats.

The West and South study Areas fall squarely within the highest priority long term areas for conservation due to its proximity to existing roost sites, its relative higher elevation, and its critical position as a bridge to the east for both Stone Lakes National Wildlife Refuge and Consumnes River basin crane populations. The loss of the West and South Study Area were not analyzed looking at the effects of climate change on sea level rise and the resultant loss of lower elevation habitat. Because of both the increased importance for foraging during cyclical flood events and the long-term importance for conservation for the greater sandhill, and other listed and species of concern, because of impacts of climate change, the loss of the SOIA area would result in potentially significant and unavoidable impacts to Greater Sandhill Cranes and lesser sandhill cranes.

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Letter 3 continued

Though this DEIR is not specifically required to analyze the impact of climate change, the SSHCP is required to do so, and it identified the upland foraging areas like that in the West and South Study Areas, as well as upland habitat near Galt, to be an important part of the Conservation Strategy for Greater Sandhill Cranes and as a result requires that at least 1,000 acres of this important foraging habitat to be conserved. The fact that Elk Grove has West and South Areas makes that SSHP requirement at a minimum increasingly expensive, and at a maximum not possible. This important impact on the SSHCP was not analyzed.

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Impact on the South Sacramento Habitat Conservation Plan

Impact 5.4.6 states:

Because the SSHCP has not been adopted or implemented at this time, there would be **no impact** related to potential conflicts with an adopted habitat conservation plan under existing conditions...

The proposed West and South Study Areas, which total approximately 5,200 acres, are located outside the UDA and within PPU 6. Though future development in the West and South Study Areas would preclude the use of this area as mitigation lands in PPU 6, the mitigation for the loss of Swainson's Hawk foraging habitat, which would be required of all development projects in these areas, as well as mitigation for impacts for other biological resources, would contribute to the SSHCP's overall conservation goals. Thus, development allowed under the General Plan would not be inconsistent with the provisions of the SSHCP, if it is adopted.

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It is disingenuous to dismiss significant and damaging impacts on the SSHCP because it has not yet been adopted, especially because adoption is imminent. It is also simply untrue that removing 5,200 acres from the inventory from the SSHCP "would not be inconsistent with the provisions of the SSHCP."

The SSHCP must be able to assure that it can successfully implement the conservation strategy, which is the heart of the Plan. One of the issues with the West and South Study Area and the SSHCP is that in the western portion of the SSHCP plan area it undermines the "feasibility of acquisition," which reflects the likelihood of being able to successfully acquire the necessary amount of mitigation land. The "feasibility of acquisition" is expressed as a percentage of the available "inventory" that must be purchased to meet mitigation needs – the higher the percentage the harder it is to meet the acquisition needs. A "feasibility" of 50% means that half of all suitable land in the "inventory" side of the Plan area would need to be purchased to comply with the conservation strategy. Since lands will only be purchased from willing sellers, the likelihood for success would be extraordinarily small. The current "feasibility for acquisition" in the western portion of the plan area is close to the 15% that the California Department of Fish and Wildlife feels will ensure that enough willing sellers can be found to complete the land acquisitions

Letter 3 continued

required in the Plan. The loss of the inventory that is within the West and South Areas would drive that number upward above that which the CDFW feels is acceptable.

The fact that Elk Grove is no longer a participant in the SSHCP does not change the fact that they would need to be doing land acquisition mitigations in the same footprint as the SSHCP. (Please refer to the January 12, 2018 letter from the California Fish and Wildlife Service that clearly states that mitigation Swainson's Hawk impacts in the area immediately to the south of Elk Grove need to be mitigated in Preserve Planning Unit 6 of the SSHCP) The impact to the SSHCP is doubled by the fact that any West and South Study Area urbanizations would remove needed acreage from the "inventory" side of the plan (the side where land is acquired) reducing the available footprint that the SSHCP has to do its own mitigations, and then it would remove another equal amount of land from the "inventory" side of the Plan because it would have its own land acquisition mitigation requirements to fulfill. So as an example, if LAFCo approved an expansion in the SOI of 1,000 acres, the hit to the SSHCP's inventory of available lands for acquisition would be 2,000 acres.

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Special Status Wildlife and the reliance on the CNDDB

It is fairly clear that the CNDDB (California Natural Diversity Database) was the main source of information that was used in determining what special species should be considered for analysis. The CNDDB states that "(i)t is a positive detection database. Records in the database exist only where species were detected." The CNDDB states as a disclaimer to use of its databases: "We work very hard to keep the CNDDB and the Spotted Owl Database as current and up-to-date as possible given our capabilities and resources. However, we cannot and do not portray the CNDDB as an exhaustive and comprehensive inventory of all rare species and natural communities statewide. Field verification for the presence or absence of sensitive species will always be an important obligation of our customers." This means that the absence of a record does not mean that a species is not present. It is also important to realize that for avian species there is a bias towards nesting data over occurrence data. There were and are many other available sources of occurrence data available for the vicinity of the SOIA area including information from the Cosumnes River Preserve, Stone Lakes National Wildlife Refuge, Christmas bird counts (the Rio Cosumnes count includes the SOI area), and eBird to list a few. Reviewing some of this other available data, and a literature search of specific species, indicates species that should have been included in the analysis that weren't.

3-11

Some of the additional special status avian species that should have been considered based on occurrence information from Christmas bird counts for the Rio Cosumnes Area, as well as species occurrence data from the Bufferlands and the Cosumnes River Preserve, are: double crested cormorant, white faced ibis, whimbrel, long billed curlew, California gull, cooper's hawk, sharp shinned hawk, ferruginous hawk, prairie falcon, merlin, short eared owl and Lewis' woodpecker. For some of these ignored avian species, the West and South Study Areas are important habitat, like the long billed curlew. We again caution on relying solely on the CNDDB for analysis of these species and suggest a deeper literature review as well. As an example, long billed curlew habitat

Letter 3 continued

is commonly listed as grassland, but a more in depth review also indicates that in the Central Valley of California it commonly uses agricultural fields as well, and has a marked preference for irrigated alfalfa and irrigated pasture (Shuford et al, “The importance of Agriculture to the Long-Billed Curlew in California’s Central Valley in Fall”), both of which are present in the West and South Study Areas.

Some additional mammalian species that should have been considered are: the Ornate Shrew, Pallid Bat, Spotted Bat, Townsend’s Big-Eared Bat, Western Mastiff Bat, and the California Kangaroo Rat. For reptiles, the Coast Horned Lizard should have been considered and analyzed.

Conclusion

The environmental document is inadequate and incomplete in its discussion and recognition of 1) the significance of MTP/SCS Plan inconsistency, 2) water supply uncertainty and groundwater aquifer impacts, 3) the importance of foraging habitat in the growth study areas for sandhill cranes and 4) consistency with the SSHCP.

We believe that these concerns are significant to the extent that removal of the growth study areas from the General Plan is warranted. Regardless, the environmental document is remiss and inadequate in its failure to recognize that there are feasible policy mitigation measures.

ECOS recommends that environmental document recognize the following policy mitigation measures:

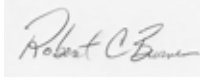
1. Elk Grove will not apply for or support applications for Sphere of Influence expansion until the necessary acquisitions to meet the conservation targets of the SSHCP for the sector in question are executed.
2. Elk Grove will not apply for or support applications for Sphere of Influence expansion until the area in question is identified by SACOG as a potential growth area that would be consistent with the MTP/SCS in meeting mandated regional GHG reductions and Air Quality Attainment.
3. Elk Grove will not apply for or support applications for Sphere of Influence expansion an adequate water supply for the given area is demonstrable and *fully executed* under law.

Thank you for your consideration and the opportunity to comment.

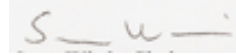
Sincerely,



Ralph Propper
ECOS Board President



Rob Burness
Co-Chair, Habitat 2020



Sean Wirth
Co-Chair, Habitat 2020

3-11
cont.

3-12

Letter 3 continued

California Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
916-358-2900
www.wildlife.ca.gov

EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director



January 12, 2018

Ms. Laura Gill
City Manager
City of Elk Grove
8401 Laguna Palms Way
Elk Grove, CA 95758

Dear Ms. Gill:

Request for 30-day consultation regarding Swainson's hawk Mitigation Proposal, Kamilos Southeast Policy Area Project, City of Elk Grove, California

Please find the attached California Department of Fish and Wildlife analysis of the Swainson's Hawk Mitigation Proposal, Kamilos Southeast Policy Area Project, City of Elk Grove, California.

If you have any questions regarding this letter and attachment, please contact Isabel Baer at (916) 205-7339 or by email at Isabel.Baer@wildlife.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Thomas".

Kevin Thomas
Acting Regional Manager

Attachment (1)

cc: Dr. Richard Pan
Senate, 6th District
District Office
2251 Florin Road, Suite 156
Sacramento, CA 95822

Mr. Ken Cooley
Assemblyman, 8th District
District Office
2729 Prospect Drive, Suite 130
Rancho Cordova, CA 95670

Letter 3 continued

Ms. Laura Gill
Kamilos Southeast Policy Area Project
Page 2 of 3
January 12, 2018

Mr. Jim Cooper
Assemblyman, 9th District
District Office
9250 Laguna Springs Drive, Suite 220
Elk Grove, CA 95758

Mr. Don Nottoli
Supervisor, Fifth District
Sacramento County Board of Supervisors
700 H Street, Suite 2450
Sacramento, CA 95814

Mr. Alex Harold
Office of Assemblymember McCarty
State Capitol, Room #2136
Sacramento, CA 95814

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Cosumnes Coalition

Letter 3 continued

Ms. Laura Gill
Kamilos Southeast Policy Area Project
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January 12, 2018

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California Department of Fish and Wildlife

Letter 3 continued

Attachment 1

Letter 3 continued

CDFW Analysis: Kamilos Project: Swainson's Hawk Foraging Habitat Mitigation Proposal at Van Vleck Ranch

CDFW, as a trustee agency for the Swainson's hawk (SWHA) and when consulting regarding the value of lands offered as mitigation for the loss of SWHA foraging habitat, use the following criteria in making our recommendation as a means to best provide direction to lead agencies to lessen their impacts to below a significant level (a standard required by the California Environmental Quality Act, (CEQA)):

1) Proposed foraging habitat mitigation sites should be used as foraging habitat by SWHA

In October of 2016, Estep Environmental Consulting prepared a Habitat Suitability Assessment for the SWHA on the Van Vleck Ranch. According to the report, the proposed Van Vleck Ranch mitigation site is on the eastern edge of the Swainson's hawk breeding range and retains habitat conditions that most resemble historic nesting and foraging conditions. Figure 4 illustrates the nesting distribution in the vicinity of the ranch. There are four documented nesting sites within 2 to 3 miles of the ranch and one documented nest site on the ranch. The report concludes that the entire proposed Van Vleck Ranch mitigation site supports suitable nesting and foraging habitat for the Swainson's hawk.

2) Proposed foraging habitat mitigation sites are in close proximity to the impact site

In order for CEQA Lead Agencies to lessen impacts to SWHA foraging habitat to below a level of significance, mitigation lands used to offset impacts must be located in a biologically supportable distance from the impact site. In addition to the City's Swainson's Hawk Code, many biological consultants and mitigation bankers have expressed that this distance is, or should be 10 miles. An accurate and biologically supportable distance to use when establishing a service area should consider the home ranges and core use areas used by both males and females.

SWHA establish their nests adjacent to their foraging grounds and rely, through the nesting season, on feeding within close proximity to the nest (Bloom 1979). Occasionally these birds (mostly males) fly miles away to feed during harvesting or flooding events on various croplands (Estep 1989), but they can't rely on utilizing long distance feeding grounds to successfully provide for and eventually recruit young into the population. If prey resources are not sufficient, or if adults must hunt long distances from the nest site, the energetics of the foraging effort may result in reduced nestling health and survival with an increased likelihood of disease and/or starvation. In more extreme cases, the breeding pair, in an effort to assure their own existence, may even abandon the nest and young (Woodbridge 1985).

The proposed Van Vleck Ranch mitigation site is 18 miles from the Project site and is not within a biologically supportable distance from the impact site.

Letter 3 continued

CDFW Analysis: Kamilos Project
January 12, 2018

3) Proposed foraging habitat mitigation sites should contain at least the same quality or better suitable foraging habitat than habitat impact site

The greatest threat to the Swainson's hawk population in California continues to be loss of suitable foraging and nesting habitat, in portions of the Swainson's hawks breeding range, due to urban development and incompatible agriculture. This impact has greatly reduced their range and abundance in California in the last century (CDFW 2016, California Department of Conservation, 2011; Wilcove et al. 1986; Semlitsch and Bodie 1998). In the Central Valley, Swainson's hawk forage more often in mixed agricultural lands that support irrigated hay crops (e.g. alfalfa), as well as dryland pasture, grassy ruderal lots, and some irrigated crops, due to a higher accessibility and relative abundance of prey (Bloom 1980, Estep 1989, Babcock 1995, Smallwood 1995, Swolgaard, et.al. 2008). Alfalfa fields are more routinely used by foraging Swainson's hawks than any other crop type (Bloom 1980, Woodbridge 1985, Estep 1989, Babcock 1995, Sernka 1999, Anderson et. al. 2011).

The proposed Van Vleck Ranch mitigation site does not contain similar foraging habitat as the impact site. The majority of the proposed Van Vleck Ranch mitigation site is characterized by annual grassland with oak woodland, whereas the impact site contains a mix of alfalfa and other semi-perennial hays, hayfields, irrigated cropland and irrigated pasture. Therefore, the proposed Van Vleck Ranch mitigation site would not be able to support the larger population density that is present near the Project site. This is also acknowledged in Estep's October 2016 report.

4) Proposed foraging habitat mitigation sites should be connected to other protected habitat thereby contributing to a larger habitat preserve

The proposed property is adjacent to other protected habitat.

5) Foraging habitat mitigation sites should be outside of areas identified for urban growth

The proposed site is outside of any urban growth as depicted by the current Sacramento County General Plan, the areas governing planning document.

6) Proposed foraging habitat mitigation sites should be managed in perpetuity as foraging habitat

The City's Swainson's Hawk Code would require the mitigation property to be managed in perpetuity as foraging habitat.

7) CEQA Lead Agencies should be supportive of the proposed foraging habitat mitigation sites

On December 8, 2017, the City sent a letter in support of the proposal.

Letter 3 continued

CDFW Analysis: Kamilos Project
January 12, 2018

8) Proposed foraging habitat mitigation sites should not conflict with regional conservation planning efforts

South Sacramento Habitat Conservation Plan (SSHCP) staff indicated that the proposed mitigation location will not conflict with the SSHCP current acquisition targets at the proposed Van Vleck Ranch mitigation site. However, the SSHCP targets conservation for SWHA in an area south of the City of Elk Grove and west of Highway 99 within Sacramento County. Although the site will not conflict with the SSHCP, the proposed location will not advance the SWHA preservation goals or objectives under the SSHCP conservation strategy.

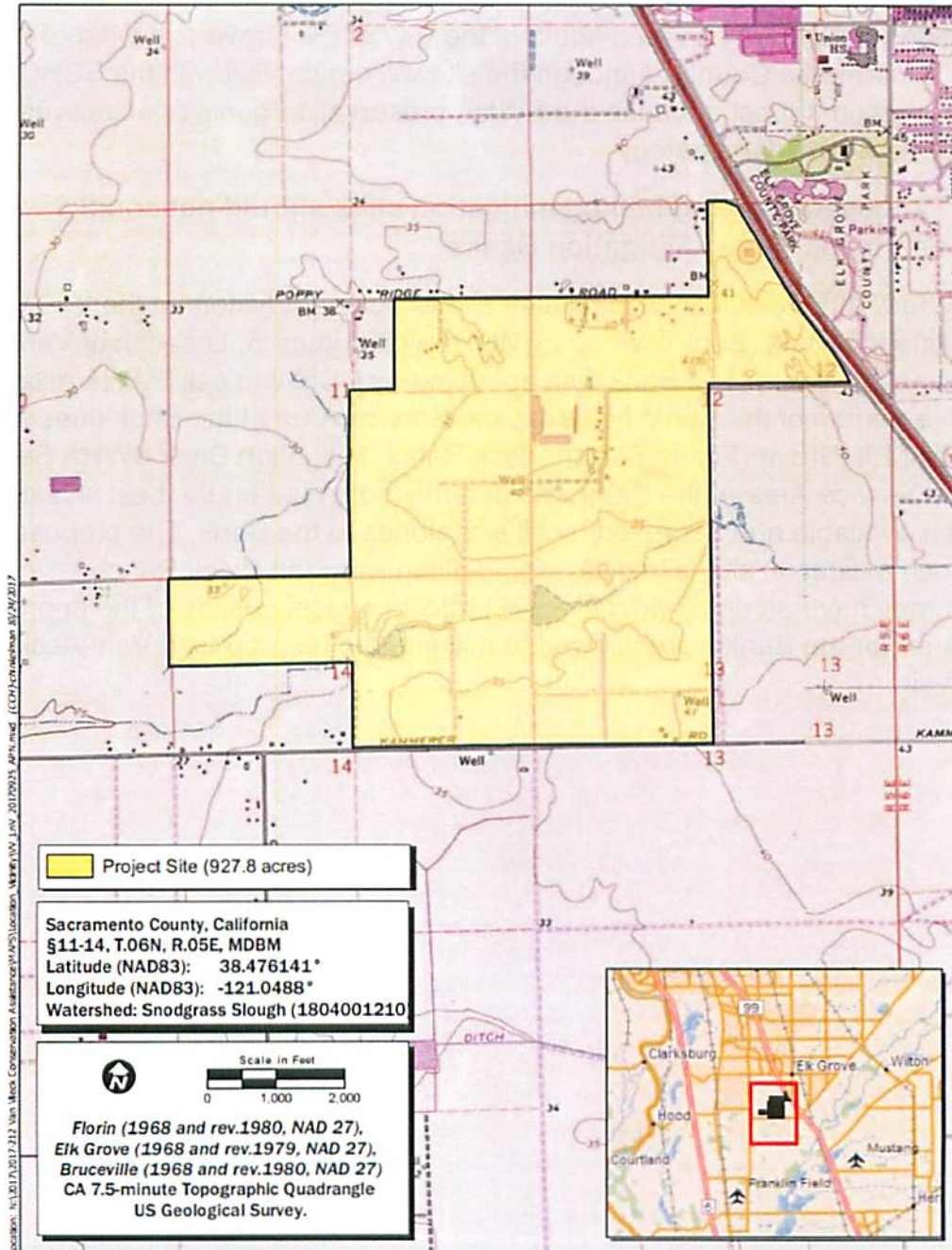
9) Proposed foraging habitat mitigation sites should not conflict with nearby approved Mitigation Banks

The proposed Van Vleck Ranch mitigation site is located adjacent to the Van Vleck Ranch Mitigation Bank (Bank) owned by Westervelt (Figure 5. Location of Van Vleck Ranch Mitigation Bank). The Bank was approved by CDFW to sell SWHA mitigation credits on a portion of the Bank; however, the Service Area of the Bank does not extend to the City of Elk Grove (Figure 6. Van Vleck Ranch Mitigation Bank SWHA Service Area). The Service Area of the Bank was determined based on the best scientific information available and approved by all signatories to the Bank. The proposed Van Vleck Ranch mitigation site is in direct competition with Van Vleck Ranch Mitigation Bank and may have an unfair advantage if project impacts outside of the approved Service Area for the Bank were allowed to mitigate on the proposed Van Vleck Ranch mitigation site.

Letter 3 continued

CDFW Analysis: Kamilos Project
 January 12, 2018

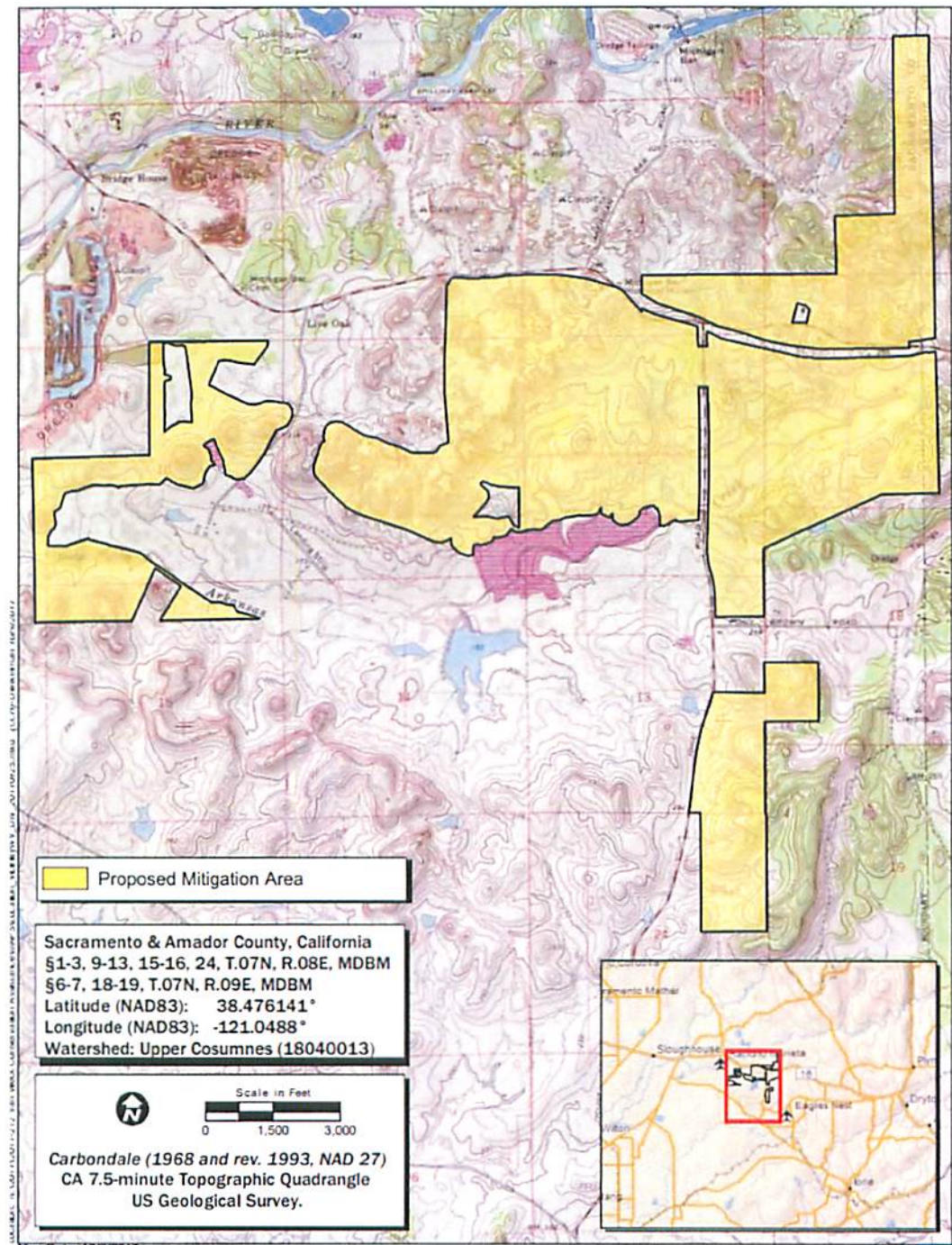
Figure 1. Project Location



Letter 3 continued

CDFW Analysis: Kamilos Project
January 12, 2018

Figure 2. Proposed Mitigation Area



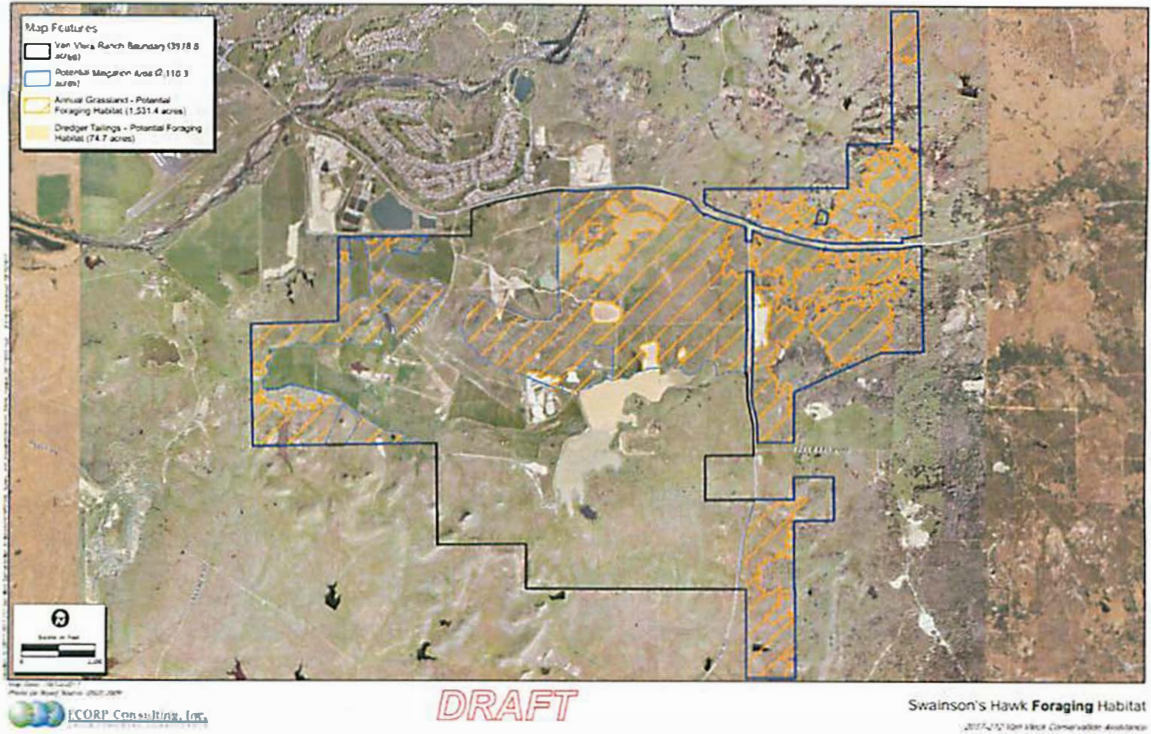
Map Date: 10/9/2017
Service Layer Credits: Copyright © 2015 DeLorme
Copyright © 2013 National Geographic Society, Inc. used
DRAFT
EcoPlan Consulting, Inc.

Van Vleck Ranch Location and Vicinity
2017-212 Van Vleck Conservation Assistance

Letter 3 continued

CDFW Analysis: Kamilos Project
January 12, 2018

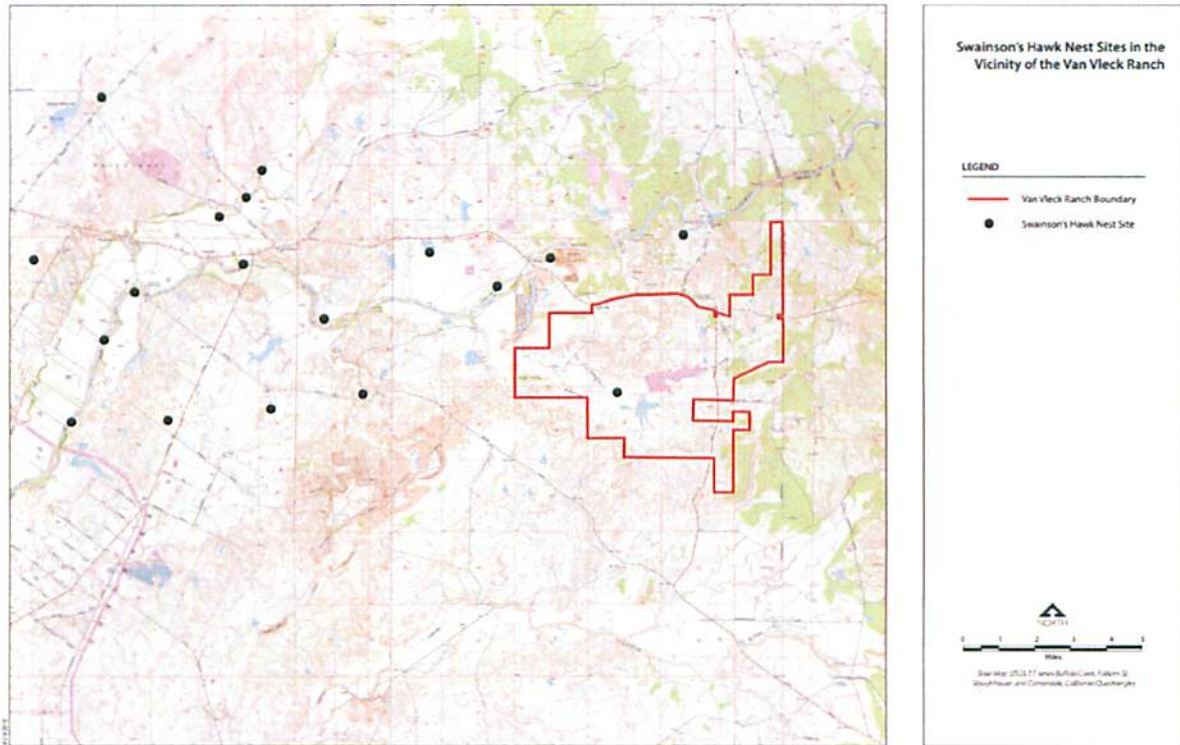
Figure 3. SWHA Foraging Habitat at Van Vleck



Letter 3 continued

CDFW Analysis: Kamilos Project
January 12, 2018

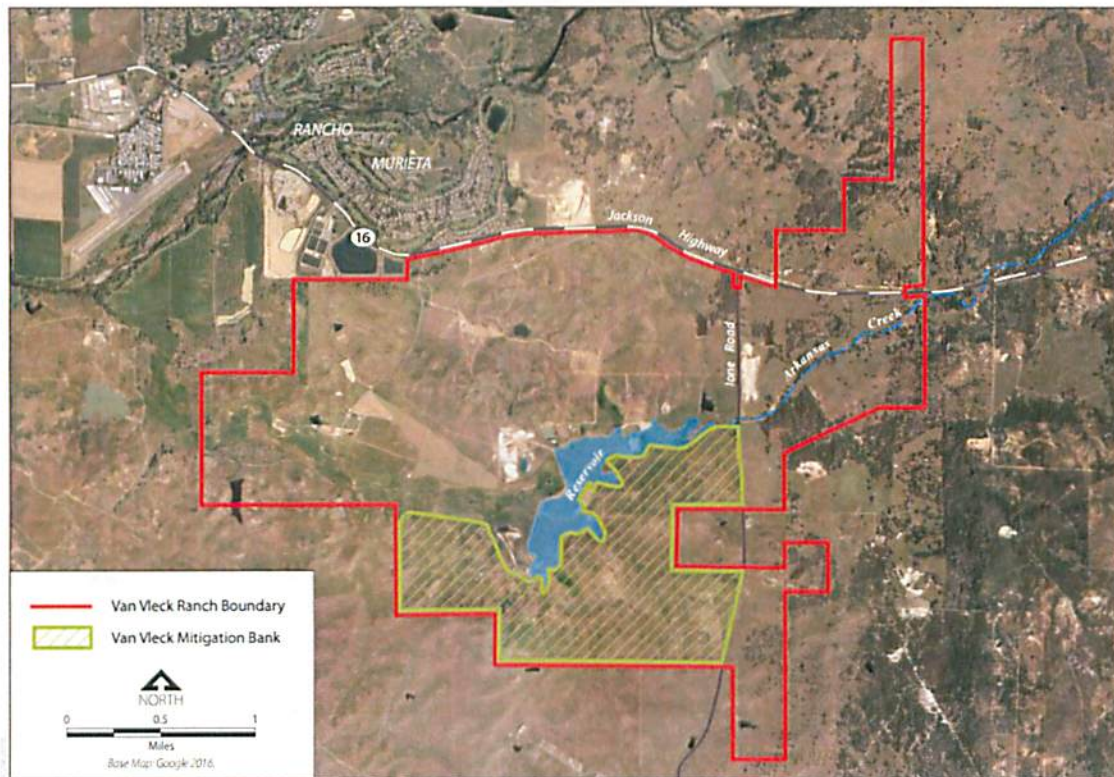
Figure 4. SWHA Nesting Distribution near Van Vleck Ranch



Letter 3 continued

CDFW Analysis: Kamilos Project
January 12, 2018

Figure 5. Location of Van Vleck Mitigation Bank

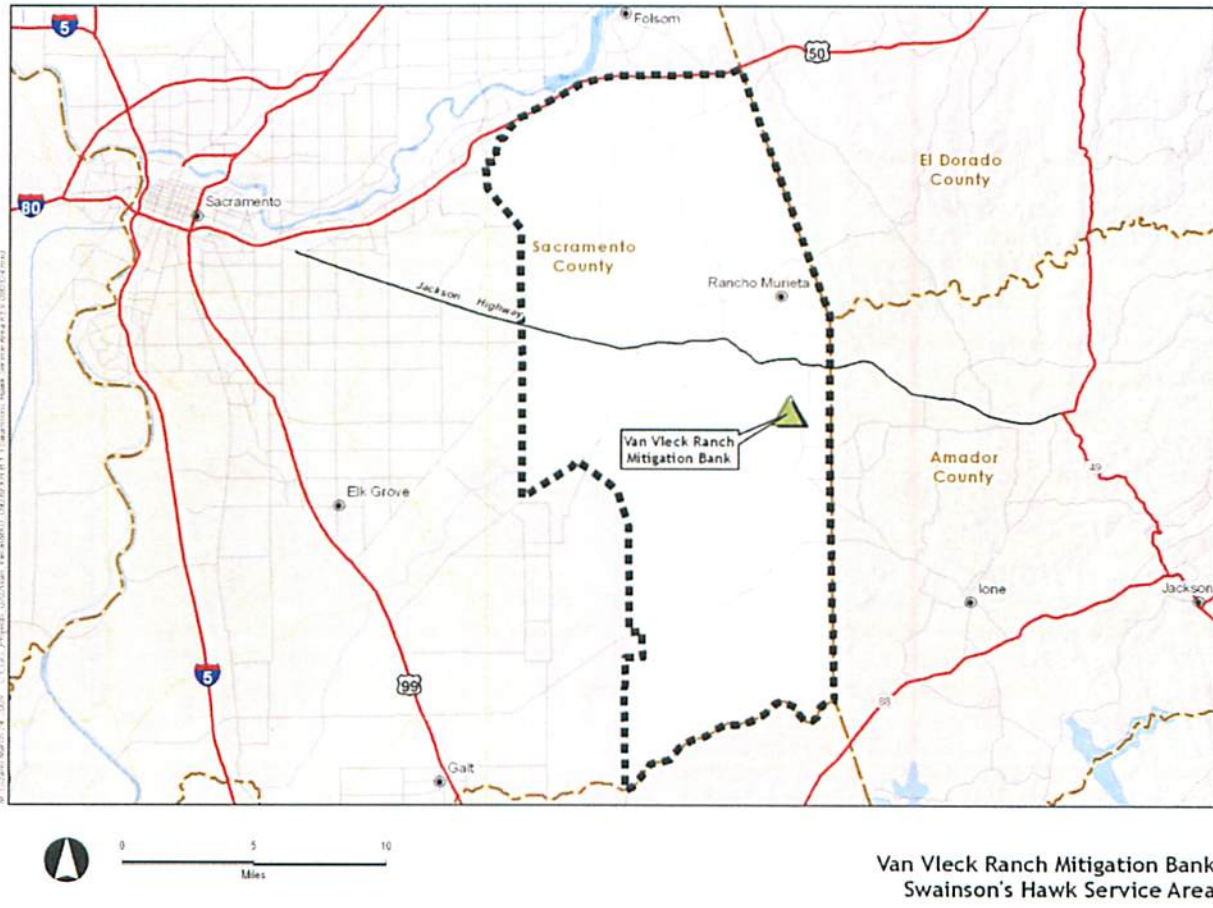


Van Vleck Ranch

Letter 3 continued

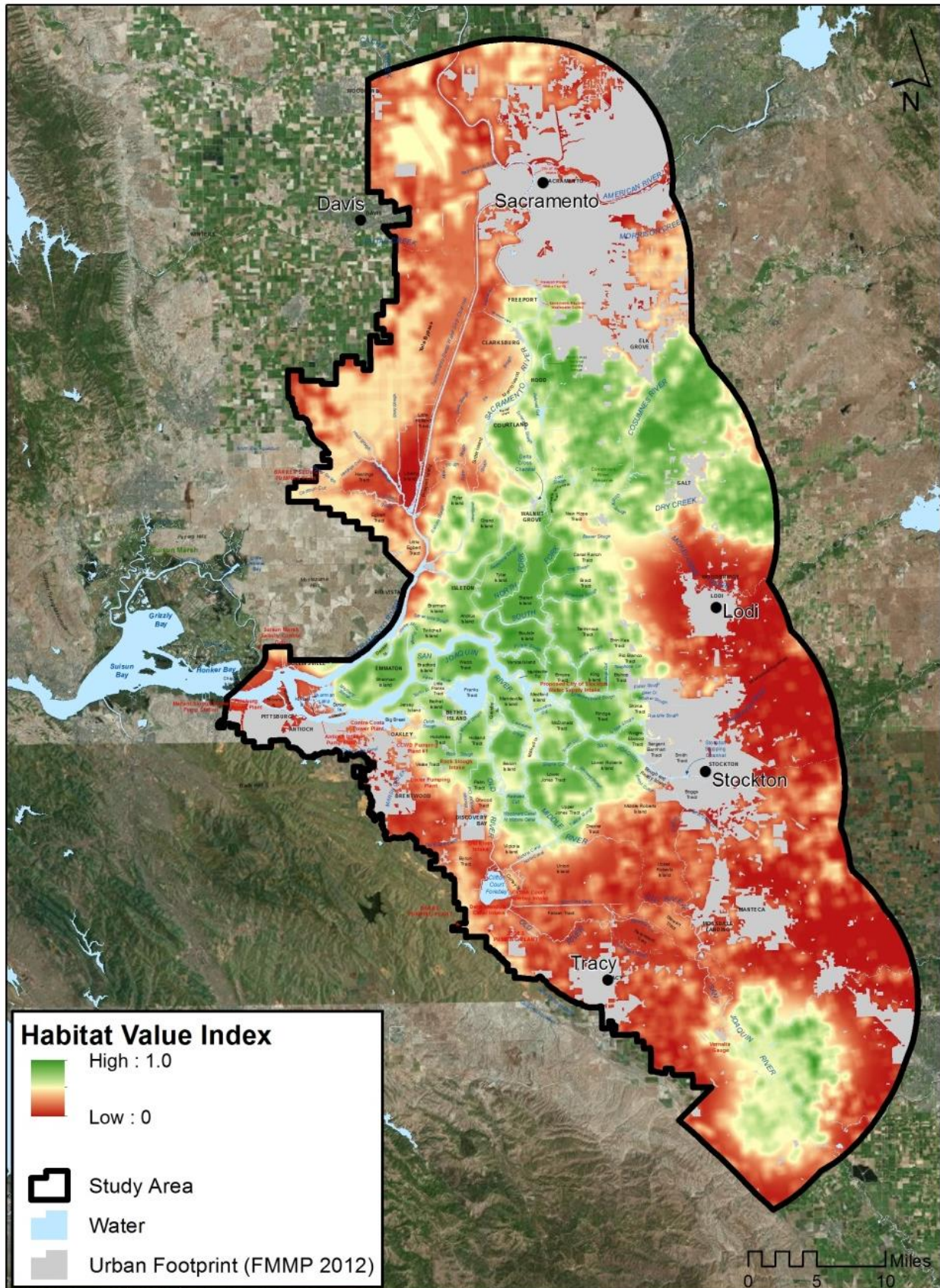
CDFW Analysis: Kamilos Project
January 12, 2018

Figure 6. Van Vleck Ranch Mitigation Bank SWHA Service Area



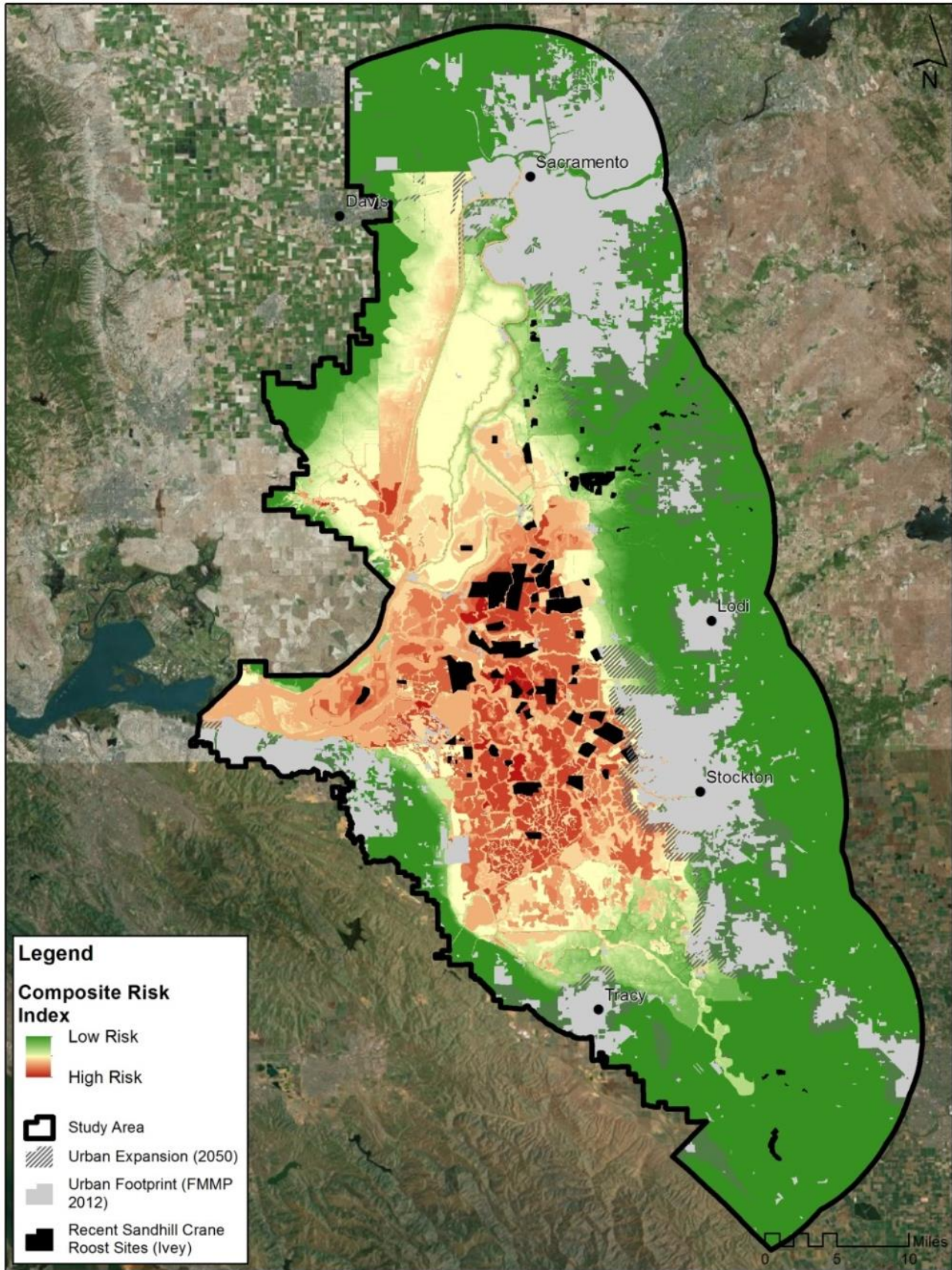
Letter 3 continued

Current Crane Habitat Value (Not Accounting for current abundance patterns)



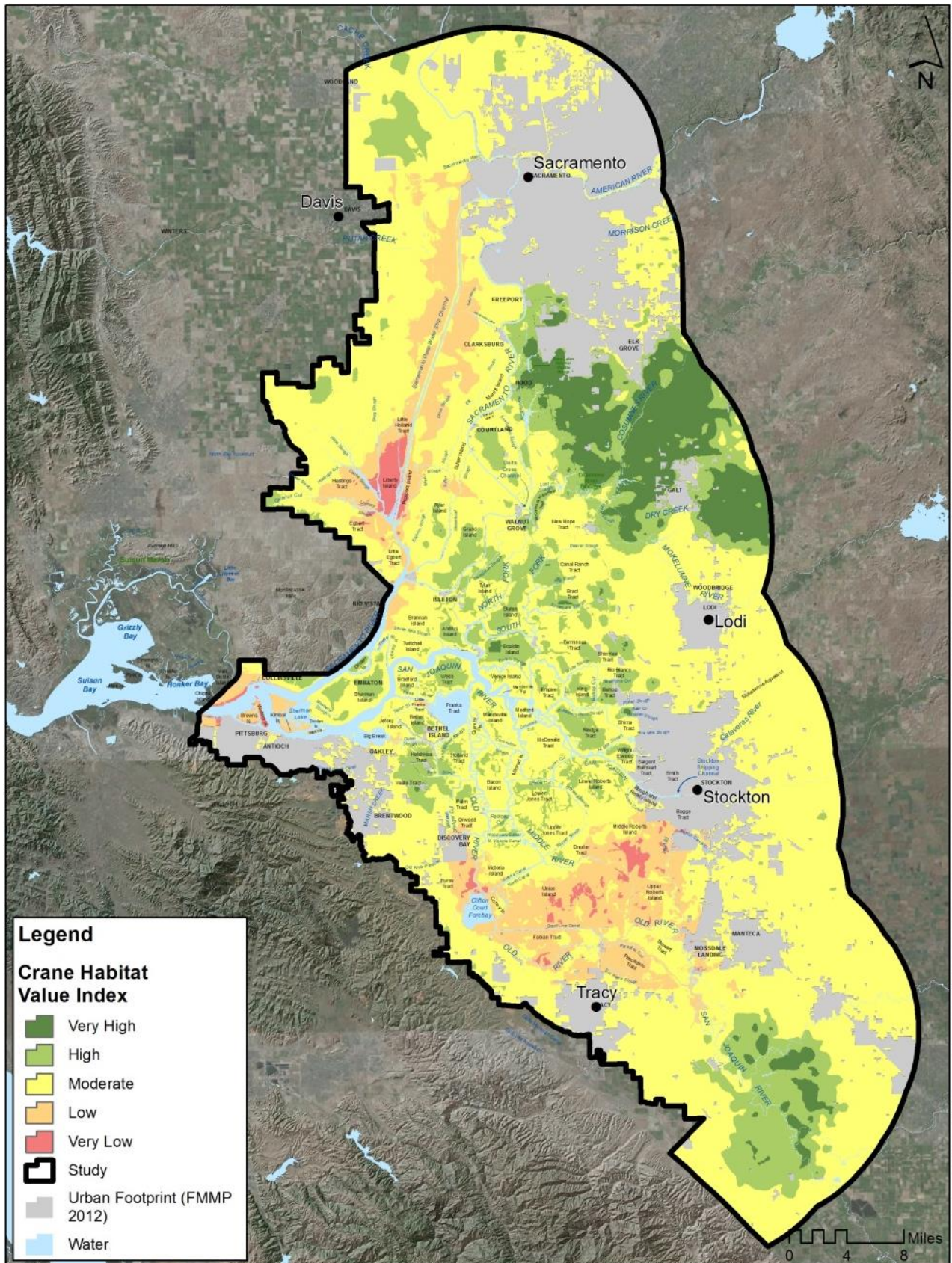
Letter 3 continued

Risk Landscape based on current elevations, sea level rise in 2100, and potential for levee failure



Letter 3 continued

Relative Priority Areas for Long-term Conservation (Delta remains critical but is at high risk)



4.0 COMMENTS AND RESPONSES

Letter 3 – Environmental Council of Sacramento (ECOS)

Response 3-1:

The commenter provides a description of ECOS. This is an introductory comment and does not address the adequacy of the Draft EIR. No response is required.

Response 3-2:

This comment is primarily directed to the merits of the proposed Project, particularly as it relates to consistency with the SACOG MTP/SCS, growth projections and jobs/housing balance, the nexus between land use planning and transportation in the context of VMT and GHG reductions, and regional-scale environmental impacts. Each of these issues is addressed below.

The commenter expresses concern regarding expansion of the Planning Area boundaries into the Study Areas and states that the proposed Project is inconsistent with the MTP/SCS. The intent of the MTP/SCS is to guide the Sacramento region toward a more sustainable future with integration of smart land use decisions and a well-managed transportation system to accommodate the expected population growth and accompanying demand for transportation in the region. While SACOG provides transportation planning and funding for the region, it does not prevent local jurisdictions from implementing their land use authority. As stated in Response H-2, SACOG acknowledges that the proposed General Plan includes growth that is not assumed in the MTP/SCS, and it is not uncommon for general plans to include more growth than assumed in the MTP/SCS. SACOG will continue to work with the City as SACOG updates the MTP/SCS. This is not a comment on the adequacy or conclusions of the Draft EIR, and no further analysis is required.

The commenter also refers to SACOG's growth projections and states that the City's growth aspirations are unrealistic. The City disagrees. As described on page 4.0-18 in Section 4.0, Land Use, in the Draft EIR, the proposed Project would provide job-generating land uses that would help balance the City's jobs-to-housing ratio, develop a range of housing types to accommodate varying lifestyles and affordability levels, and provide for roadway and transit improvements intended to reduce VMT. By implementing these concepts, the Project would help improve the City's jobs-to-housing ratio (from the current 0.84 to 1.21) and commute times, reduce traffic in the Planning Area and surrounding region, and reduce the physical environmental impacts associated with long commutes and traffic, such as air quality, noise, and greenhouse gas emissions. This is the general intent of the MTP/SCS, and the City maintains consistency with these concepts. The concern about growth projections is not a comment on the adequacy or conclusions of the Draft EIR, and no further analysis is required.

The commenter questions the potential economic effect of the potential for jobs to be drawn from other jurisdictions. Such an analysis is not required for the Draft EIR. CEQA does not require evaluation of economic impacts of a project unless they contribute to, or cause, physical impacts on the environment (PRC Section 21080(e)(2); PRC Section 21080(e)(2); Guidelines Section 15384). To determine whether there would be an environmental impact, regional employment opportunities relative to job locations, housing, and commute patterns would need to be assessed and quantified, and the environmental effects of those changes evaluated. This type of evaluation would be speculative and premature at this time. The City would need to engage in speculation or conjecture and, as provided under CEQA Guidelines Sections 15145, such an analysis is not required.

The commenter asserts that the City's jobs-housing imbalance should be corrected within the City's current footprint. The purpose of the Draft EIR is to evaluate the Project as proposed, and the Draft EIR evaluated the land use assumptions proposed in the General Plan. It is unlikely that the development potential assumed for the proposed Project could be accommodated in the current City boundaries, but a Reduced Study Areas Alternative (Alternative 3) was analyzed in the Draft EIR pages 7.0-20 through 7.0-22.

To support its assertion that growth beyond that anticipated in the MTP/SCS requires further justification, the commenter identifies examples of cumulative and/or regional environmental impacts that may not be mitigable, including water supply, agriculture, and biological resources. The Draft EIR is not required to provide justification why a project should be approved, but it must evaluate the environmental impacts resulting from that project, if approved. The types of impacts identified by the commenter were evaluated in the Draft EIR. Water supply impacts were evaluated in Draft EIR Sections 5.9, Hydrology and Water Quality and 5.12, Public Utilities, agricultural resources impacts were evaluated in Section 5.2, Agricultural Resources, and biological resources impacts were identified in Section 5.4, Biological Resources. As commenter correctly notes, these impacts were determined to be significant and unavoidable. The City will be required to adopt a Statement of Overriding Considerations for these impacts.

The commenter is of the opinion that growth in the City could make it impossible for the region to achieve its State VMT/GHG reductions and federal air quality mandates. The proposed Project's GHG emissions, which are partly based on VMT generated by the Project, were evaluated in Draft EIR section 5.7, Greenhouse Gas Emissions and Energy. Please see Response 5-3, which addresses issues concerning VMT and GHGs in more detail. As explained in Response 5-3, with implementation of several GHG reducing measures in the CAP that are based upon reductions in VMT, such as TACM-1, TACM-2, TACM-3, TACM-4, TACM-5, TACM-6, and TACM-7, daily VMT would be reduced in 2020 and 2030. GHG emissions associated with on-road vehicle travel would be decreased through implementation of the measures included in the CAP. Citywide, GHG emissions would be 876,070 MTCO_{2e} by 2030, which is a reduction of 42,720 MTCO_{2e} from the 2013 baseline of 918,790 MTCO_{2e}, despite growth in population, employment, and housing in the City. The proposed Project's air emissions were evaluated in Draft EIR section 5.3, Air Quality. Other than speculation, the commenter did not provide any data or technical analysis contradicting the conclusions of the Draft EIR on this topic.

Response 3-3:

The commenter suggests that agricultural lands in the Study Areas should remain agricultural so that they continue to recharge the Sacramento Central Basin. This comment is generally directed to the Project merits and does not specifically address the analysis or conclusions in the Draft EIR.

Response 3-4:

The commenter describes how groundwater pumping has disconnected the Cosumnes River from the underlying aquifer, which affects salmon migration and other groundwater-dependent ecosystems such as riparian forests and species and impacts other beneficial uses. This is an existing condition and was taken into consideration in the Draft EIR. Potential impacts of the proposed Project were evaluated to determine whether the Project would contribute to future impacts on groundwater (Impact 5.9.4).

The Sacramento County Water Agency (SCWA), which is a signatory to the Water Forum Agreement, manages water supplies in the greater Sacramento area. Contrary to the

4.0 COMMENTS AND RESPONSES

commenter's assertion, the Draft EIR did not make selective use of Sacramento County Groundwater Authority (SCGA) information, but was instead appropriately considered, as laid out below. As discussed on Draft EIR page 5.9-19, under the Water Forum Agreement, the long-term average annual pumping from the Central Basin is limited to 273,000 AFY, which is the sustainable yield level set forth in the Water Forum Agreement. Monitoring and data analysis by the SCGA indicate that subbasin operations from 2005 through 2017 have not exceeded the sustainable yield conditions. Maintaining the withdrawals to level deemed sustainable in the Water Forum Agreement would ensure that conditions described in the comment would not occur. The Project's project-specific and cumulative water demand are addressed in Impacts 5.9.3 and 5.9.7, respectively. The Draft EIR conservatively concluded that the Project's additional water demand is significant because the proposed Project may contribute to conditions that could affect aquifer volume or groundwater levels, and the City has no authority over management of groundwater resources. However, as a signatory to the Water Forum Agreement, SCWA would not be able to exceed the annual sustainable yield amount without amendments to the Water Forum Agreement.

The commenter states the Draft EIR asserts that development in the Study Areas would increase the amount of recharge that occurs. The commenter is incorrect; no such assertion is made in the Draft EIR. In fact, the Draft EIR states in Impact 5.9.7 on page 5.9-41 that the Project could have an adverse effect on groundwater conditions, which includes recharge potential. The Draft EIR concluded the Project's contribution could be significant, that even with mitigation, the impact would be significant and unavoidable.

The commenter states that it is unconscionable to propose new growth when the water purveyor asserts it cannot provide adequate water supplies under drought conditions and states the Project should be denied on the basis of insufficient water supply. The commenter's opposition to the Project is noted, but the Draft EIR does disclose this fact, which is a factor in determining that the impact related to water demand was determined to be significant and unavoidable in the Draft EIR.

Response 3-5:

The commenter states that inclusion of the West and South study areas in the General Plan will inflate agricultural land prices in these areas, which would affect the South Sacramento Habitat Conservation Plan (SSHCP) or other conservation efforts to purchase these lands, and that this is an environmental impact that should have been analyzed in the Draft EIR. The Draft EIR evaluated consistency with the SSHCP in Impact 5.4.6 and concluded there would be no impact. As discussed in Draft EIR Impact 5.4.6, the West and South Study areas lie within the SSHCP Preserve Planning Unit (PPU) 6, which contains approximately 67,120 acres of non-preserved land. The SSHCP has targeted 9,750 acres in PPU 6. Because there would be adequate acreage in other portions of PPU 6, the development of the West and South Study Areas would not preclude the opportunity for the SSHCP goals or additional conservation efforts to occur. In addition, mitigation for impact-related development in the West and South Study areas could be mitigated in PPU 6, supporting the SSHCP goals. In addition, land price inflation is speculative, and economic impacts of a project that do not contribute to, or are not caused by, physical impacts on the environment are beyond the scope of CEQA [Pub. Res. Code Section 21080(e)(2), Pub. Res. Code Section 21082.2(c); Guidelines Section 15384]. The economic impacts of a project are only subject to CEQA if those impacts cause physical impacts. Other than conjecture that land prices would be inflated, and this would result in an environmental impact, the commenter did not provide any data or technical analysis supporting its assertion that there would be physical impacts requiring analysis. No revisions to the Draft EIR are necessary as a result of this comment.

Response 3-6:

The commenter states that the Draft EIR does not describe the geographical and biological relationship between the West and South study areas and the Stone Lakes National Wildlife Refuge (SLNWR) and the Cosumnes River Preserve (CRP), including the importance of these study areas as foraging areas and wildlife movement corridors for species from both SLNWR and CRP and the buffer functions these Study Areas provide to absorb direct and indirect impacts from urban activities to the preserve areas. The commenter also mentions that species survey data collected in SLNWR and CRP were not included in the Draft EIR analyses.

The Draft EIR evaluated impacts resulting from buildout of the Planning Area on regional species populations, which includes population segments that occur in SLNWR and CRP. There are approximately 2 to 6 miles of farmland matrix between the West and South Study areas and the SLNWR and CRP holdings. Species populations that utilize these preserves are not limited to the preserve boundaries but occur throughout the farmland matrix in the region. Impacts 5.4.1 and 5.4.2, which analyzed impacts on sensitive species known or with potential to forage in Planning Area to the regional population, and Impact 5.4.4, evaluated the impacts on migration and movement corridors to address impacts to species populations on the SLNWR and CRP holding. Therefore, relevant data were used to evaluate impacts. The comment does not include the species survey data referenced in the comment nor specific detail on how this information could add to the analyses presented in the Draft EIR or its conclusions. No further response is possible.

Response 3-7:

The commenter states that the CRP and SLNWR are active floodplains that inundate cyclically, noting that upland foraging lands such as the West and South Study Areas are critical for upland foraging areas during the cyclical inundations, and habitat loss due to global climate change and sea level rise will create greater upland foraging needs. The commenter goes on to state this impact should be evaluated in the Draft EIR.

The current utilization by wildlife in the Planning Area is discussed in Section 5.4 Biological Resources. It is predicted that global climate change and sea level rise will result in modifications in species distribution over the landscape, but such changes would occur regardless of whether the proposed Project is implemented. Studies identifying if specific individuals of populations from CRP and SLNWR utilize the West and South study areas during five to seven cyclical inundations is beyond the CEQA scope of analyses (*Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383.)

CEQA Guidelines Section 15204(a) states, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters." CEQA requires adequate and complete analysis and a good-faith effort at full disclosure in an EIR, but it does not require "technical perfection" (CEQA Guidelines Sections 15003). It would be speculative to draw a conclusion of how existing populations will respond, and such an analysis is not required, as provided under CEQA Guidelines Section 15145.

Response 3-8:

The commenter states the West and South Study Areas have provided critical upland foraging habitat for the greater sandhill crane during the frequent flood events in the lower Cosumnes basin, and that no investigation or scientific determination has been made as to the impact of the removal of upland foraging habitat for the greater sandhill crane and other listed and

4.0 COMMENTS AND RESPONSES

species of concern, specifically during flood episodes. The commenter further states that use by sandhill crane in the agricultural land in or around the sphere of influence area was recorded during a flood event.

The EIR acknowledges the potential use of the Planning Area by the greater sandhill and lesser sandhill crane (Draft EIR pages 5.4-42, 5.4-53 thru 5.4-57). As discussed in the Draft EIR, proposed General Plan Policy LU-3-22 calls for a mitigation program for critical habitat for special status species known to occur within the Study Areas. This policy would require that future projects determined to have a significant impact on habitat for special-status species must implement all feasible mitigation measures established in the program, including but not limited to land dedication (which may be located either inside or outside the corresponding Study Area) or fee payment, or both. This was found to be a significant and unavoidable impact because, even with implementation of the measures in Policy LU-3-22, there would be an overall reduction in available habitat.

In terms of the importance of the area for greater and lesser sandhill crane conservation, Ivey et. al. (referenced by the commenter) identified that crane winter range has expanded in the Central Valley since the 1960s. Since greater sandhill cranes are loyal to their wintering sites, conservation priorities should be protection of known roosting sites and surrounding foraging landscapes, increased food availability within these adjacent lands, and creation of roost sites toward the edge of their existing range. However, there are no known roost sites in the West and South Study areas.

In response to the comment regarding lack of investigation on the importance of upland habitat during flood events, this is an existing condition and would not be a condition caused by the proposed Project. As discussed in Impact 5.9.3 (Draft EIR page 5.9-35), the proposed Project would not contribute to flooding and as discussed above, potential effects on sandhill crane were also evaluated. Therefore, the EIR adequately addresses potential physical effects of buildout of the General Plan as proposed.

Response 3-9:

The commenter discusses Dr. Rod Kelsey's preliminary modeling in the north Delta to identify targets for greater sandhill crane conservation. The modeling effort was presenting on three maps included with the comment letter. The first map (figure 1) depicts current high value crane habitat based on suitable ground cover-type and distance from established roost sites (within a 2-mile diameter of established site). The second map (figure 2) depicts the areas that are at risk of permanent inundation based on conservative sea level rise predictions, relative existing elevations, and potential for levee failure and illustrates most conserved lands are at risk of being lost. The third map depicts how conservation priorities need to shift populations to the east.

The commenter states the West and South Study Areas fall squarely within the highest-priority long-term areas for conservation. It is difficult to discern the location of the West and South study areas in figures 1-3. However, Figure 5.9-3 of Section 5.9 Hydrology and Water Quality indicates that most of the West and South Study Areas are inundated in a 200-year event (assuming extensive levee failure especially along the north bank of the Cosumnes River). This analysis illustrates that these Study Areas do not present long-term foraging opportunities during levee breaks. As such, the analysis requested by the commenter is not required. See Response 3-7 regarding the need for additional study and CEQA requirements.

Response 3-10:

The commenter states that the Draft EIR dismisses “significant and damaging impacts on the SSHCP because it had not yet been adopted” and that the development of the West and South Study areas would reduce the inventory of available land in SSHCP PPU 6 and preclude the SSHCP from achieving the conservation goal for PPU 6. The Draft EIR does not dismiss impacts on the SSHCP because it had not been adopted at the time the Draft EIR was prepared. The Draft EIR considers the potential for inconsistencies with the SSHCP assuming SSHCP adoption in Impact 5.4.6 (Draft EIR page 5.4-62). As stated in Response 3-5 and as discussed in Draft EIR Impact 5.4.6, the West and South Study Areas lie within the SSHCP Preserve Planning Unit 6 (PPU) which contains approximately 67,120 acres of non-preserved land. The SSHCP has targeted 9,750 acres in PPU 6. The development of the West and South Study Areas would not preclude the opportunity for the SSHCP goals or additional conservation efforts to occur. In addition, mitigation for impact related-development in the West and South Study Areas could be mitigated in PPU 6, supporting the SSHCP goals.

Response 3-11:

The commenter states that the EIR is over-reliant on the CNDDDB and offers additional data sources, including information from the Cosumnes River Preserve, Stone Lakes National Wildlife Refuge, Christmas bird counts, and eBird. The commenter suggests that species that should be evaluated in the EIR include double crested cormorant, white faced ibis, whimbrel, long billed curlew, California gull, cooper' s hawk, sharp shinned hawk, ferruginous hawk, prairie falcon, merlin, short eared owl (SSC), and Lewis' woodpecker. The commenter states some additional mammalian species that should have been considered are: ornate shrew, pallid bat (SSC), spotted bat (SSC), Townsend' s big-eared bat (SSC), western mastiff bat (SSC), and the California kangaroo rat. For reptiles, the commenter states the coast horned lizard should have been considered and analyzed. Each of the species above marked “SSC” (species of special concern) was added to the Natural Diversity Database in November 2018, which was after circulation of the Draft EIR.

The species identified in the Draft EIR are not intended to be a comprehensive list of all species that may use the habitat in the Planning Area during some part of their life cycle (over wintering, migrating, breeding), but a list of known and confirmed occurrences of special-status species populations that may be impacted through development in the Planning Area. As discussed in the Draft EIR (page 5.4-58), the proposed General Plan includes several policies and standards intended to reduce impacts on special-status species, including Standard NR-1-2a, which requires a biological resources evaluation for private and public development projects to identify the potential for the presence of special-status plant and animal species. As such, if any of the species noted by the commenter or species given special status listing in the future are determined to be present during these future evaluations, the potential effect on those species would be mitigated to the extent feasible. Thus, the inclusion of these species would not alter the conclusions of the EIR. As concluded in the Draft EIR, however, even with implementation of existing regulations and proposed Project policies and standards to reduce impacts to listed species, individual species populations would experience habitat losses where creation and enhancement of habitat is not feasible, thereby causing an overall reduction in available habitat. This was found to be significant and unavoidable.

Response 3-12:

The commenter reiterates that the EIR is remiss and inadequate in its discussion and recognition of the significance of MTP/SCS Plan consistency, water supply uncertainty and groundwater

4.0 COMMENTS AND RESPONSES

aquifer impacts, importance of sandhill crane foraging habitat in the Study Areas, and consistency with the SSHCP. The Draft EIR has adequately addressed each of these topics in accordance with CEQA requirements, as explained in Response 3-2 (MTP/SCS consistency), Response 3-4 (water supply and aquifer impacts), Responses 3-8 and 3-9 (sandhill crane), and Responses 3-5 and 3-10 (SSHCP). Based on its review of the information presented in the comments, no new significant impacts or an increase in the severity of a significant impact have been identified.

The commenter also recommends the Draft EIR recognize three policy-based mitigation measures that would not allow SOI expansion unless certain provisions pertaining to SSHCP conservation targets, MTP/SCS consistency, and water supply are met. The Draft EIR evaluated consistency with the SSHCP in Impact 5.4.6 and concluded there would be no impact, thus no mitigation is required. Based on the comments on this topic and the City's responses, no significant impact requiring mitigation has been identified.

The Draft EIR did not identify any impacts concerning MTP/SCS consistency, as explained in Response 3-2, but it did conclude that certain growth-related environmental impacts would occur, and mitigation measures were identified where necessary to reduce impacts. It is unclear how the mitigation suggested by the commenter would further reduce impacts because other than opinion and speculation, no data or technical analysis was provided in the comment demonstrating the need for this mitigation.

With regard to water supply, the Draft EIR included mitigation measure MM 5.12.1.1, which describes the process for assuring adequate water supply. It is intended to ensure that sufficient water supplies are available to meet the demand of new development in the Planning Area, in addition to existing and planned development under normal, single dry, and multiple dry years. This mitigation measure requires demonstration of adequate water supply prior to annexation through preparation of a Plan for Services prepared by the City and submitted to Sacramento LAFCo for approval. Condition (2) specifically requires that the Plan for Services demonstrate the water purveyor is a signatory to the Water Forum Agreement and that groundwater will be provided in a manner that ensures no overdraft will occur (i.e., the sustainable yield for the Central Basin will not be exceeded). LAFCo would condition future annexations on compliance with mitigation measure MM 5.12.1.1. Documenting sufficient water supply would conform to General Plan Update Policy INF-1-1 requirements. As such, the mitigation suggested by the commenter is not necessary.

Letter 4



September 26, 2018
Friends of Stone Lakes NWR
1624 Hood Franklin Road
Elk Grove, CA, 95737

City of Elk Grove
Attn: Christopher Jordan, AICP, Director of Strategic Planning and Innovation
8401 Laguna Palms Way
Elk Grove, CA 95758
email: cjordan@elkgrovecity.org

RE: Elk Grove General Plan Update and DEIR

Dear Mr. Jordan,

This letter provides the comments of the Friends of Stone Lakes National Wildlife Refuge Association (Friends) on the Elk Grove General Plan Update (Plan) and draft Environmental Impact Report (DEIR). The Friends is a nonprofit organization dedicated to preserving and protecting the Stone Lakes National Wildlife Refuge (Stone Lakes NWR). Among other activities, the Friends has worked to ensure that Stone Lakes NWR is protected from adverse impacts relating to changes in flows and water quality due to surrounding development in coordination with local, state and federal agencies.

The Refuge is the single largest complex of natural wetlands, lakes and riparian areas remaining in the Sacramento-San Joaquin Delta, and provides critical habitat for waterfowl and other migratory birds of international concern, as well as a number of endangered plant and animal species. Stone Lakes NWR and its surrounding agricultural areas are home to several special status species, including the tri-colored blackbird, greater sandhill crane, white-face ibis, long-billed curlew, Swainson's hawk, burrowing owl, giant garter snake and valley elderberry longhorn beetle.

The land both within and around the proposed growth study areas in the proposed Elk Grove General Plan provides foraging habitat for migratory waterfowl, including greater sandhill cranes, that roost at the Refuge. Sufficient upland foraging habitat in proximity to the Refuge is vital to its long term success as an important refugia along the Pacific flyway.

Accordingly we have major concerns that the Plan's South and West study area designations, which demonstrate a clear intent to expand its growth footprint beyond its current City limits, will significantly reduce upland foraging habitat and the viability of the Refuge.

The DEIR for the Plan gives scant attention to the Refuge close to the City's southwest border. The biological impacts analysis restricts itself almost exclusively to listed species,

4-1

4-2

Letter 4 continued

with no discussion of the importance of refugia along the Pacific Flyway and the need for adequate foraging habitat to support wintering migratory waterfowl populations, particularly in reference to upland foraging habitat for sandhill cranes. This needs to be corrected with additional analysis in the Final EIR.

**4-2
cont.**

We wish to include and incorporate by reference the comments on this DEIR by the Environmental Council of Sacramento (ECOS), in particular those relating to biological resources. This comment letter is thorough and addresses our concerns with regard to the DEIR on the project.

4-3

Sincerely



Chris Tooker
Board President
Friends of Stone Lakes NWR
ctooker@me.com

Letter 4 – Friends of Stone Lakes

Response 4-1:

The commenter provides information about the Friends of Stone Lakes and the Stone Lakes National Wildlife Refuge. This is an introductory comment not directed to the analysis in the Draft EIR. No response is required.

Response 4-2:

The commenter states that land within and around the proposed Study Areas provides foraging habitat for migratory waterfowl (including greater sandhill cranes, which roost at the Refuge). The commenter continues that sufficient upland foraging habitat in proximity to the Refuge is vital to its long-term success as an important refugia along the Pacific flyway and the development of the study areas will significantly reduce upland foraging habitat and the viability of the Refuge for wintering migratory waterfowl populations. Impacts 5.4.1 and 5.4.2 adequately address impacts on the regional populations of special-status and non-listed species known or with potential to forage in Planning Area, as well as their habitats. The Study Areas are predominately agricultural land cover types including vineyard, irrigated pasture and cropland. Vineyards provide little foraging or resting/ roosting habitat for migratory waterfowl. Irrigated pasture and cropland can provide limited foraging and resting habitat but does not provide aquatic features favored by overwintering waterfowl. Nonetheless, the Draft EIR concluded that an overall loss of special-status and non-listed and their habitats would occur with development of the proposed Project and would result in a significant and unavoidable impact. No further analysis is necessary nor required.

Response 4-3:

The commenter incorporates the concerns of ECOS by reference. See Responses 3-1 through 3-12.

Letter 5



September 26, 2018

City of Elk Grove
Attn: Christopher Jordan, AICP
Director of Strategic Planning and Innovation
8401 Laguna Palms Way
Elk Grove, CA 95758

Via electronic and hardcopy mail

Dear Mr. Jordan:

DEIR, GENERAL PLAN AND CAP UPDATE: 350 COMMENT

Thank you for the opportunity to comment on the subject Draft Environmental Impact Report (DEIR). 350 Sacramento is a citizen group focused on minimizing, adapting to, and reversing climate change. We appreciate the City's effort to update the Climate Action Plan (CAP) and include supporting policies in the General Plan.

We would, however, like to express the following three concerns:

Minimal Compliance Strategy

The DEIR focuses on meeting State climate-change requirements in order to streamline future project-specific greenhouse gas (GHG) CEQA analysis. From an administrative standpoint this is a reasonable approach, but given the dangers posed by climate change we suggest it is not a fully responsible one. Climate change poses a direct and urgent threat to the health and welfare of communities in California and elsewhere. In California, local jurisdictions have primary responsibility for land-use and the built environment. They thus have the most direct governmental control over vehicle miles traveled (VMT) and building energy use – the two most important GHG drivers in Elk Grove (comprising 86 percent of the total) and Statewide (53 percent of total). We urge the City to join other California jurisdictions in whole-heartedly committing to the most aggressive climate change policy feasible, particularly regarding these two sources.

5-1

Alternative 2 - Additional Climate Action Plan Measures

Per the DEIR, the rejected Alternative 2 could include, but not be limited to, applying CALGreen Tier 1 building standards, additional transportation measures, a direct offset program, and other emission reduction options considered but not included in the CAP ¹ (the DEIR also identifies other additional measures, referenced below in these comments). The rationale for

5-2

¹ DEIR Section 7.0, Alternatives; pg. 7.0-8

Letter 5 continued

discounting Alternative 2 not compelling.² We urge the City to adopt Alternative 2, based on prudent, long-term self-interest in adopting the strongest feasible CAP.

5-2
cont.

Increased GHG Emissions

On-road vehicles are the largest source of the City's GHG emissions, comprising 47 percent of total emissions (the next largest source, residential buildings, generates 25 percent)³.

We are concerned that under the project as proposed:

5-3

- GHG emissions will increase by 58 percent (2015-2050).⁴
- Vehicle miles traveled (VMT) will more than double.⁵
- Large areas of the City will generate substantially more miles of vehicle traffic than permissible under the requirements of SB 375.⁶

Potential Additional Measures

Under Alternative 2, the DEIR identifies a number of the additional measures not included in the CAP which would reduce VMT and GHG emissions:

5-4

"the City ... could include further efforts to adopt and promote transit-oriented development, pedestrian and bicycle measures, public transit, use of efficient and alternative vehicles, ... zoning changes and changes in development patterns,

² The DEIR presents three rebuttable arguments to discount Alternative 2:

- *"... the feasibility of achieving the target depends on implementation of the proposed CAP, achieving short-term targets, amending the CAP with additional measures, and monitoring emissions inventories over the next 30 years."*

IN REBUTTAL, this self-evident assertion applies to any set of measures, so does not support discarding Alternative 2.

- *"Additional technologies and reduction measures could be developed in the coming decades that would increase the probability of reaching the 2050 emissions reduction targets; however, the efficacy of this alternative would be uncertain."*

IN REBUTTAL, we agree the availability and efficacy of future new measures is unknowable. Therefore, to assume they will be available would be imprudent, particularly considering the urgency of reducing GHG emissions. The City should consequently apply measures now available and of known efficacy. Should/as improved methods become available, they can be reflected appropriately in the CAP through regularly scheduled updates or anytime.

- *"Based on this uncertainty, like the proposed Project, GHG emissions under this alternative would also be significant and may be unavoidable"*.

IN REBUTTAL, this conclusion, based on the previous faulty argument, ignores the reality that promptly applied, currently available measures would reduce GHG emissions. No evidence is presented that such measures would not reduce GHG emissions significantly. We also note that the term "significant" is used here in the narrow sense of meeting minimum CEQA thresholds, reflecting the DEIR's strategy of minimal compliance with external mandates. From the real-world perspective of climate-change physics, all GHG emissions are significant, and all reductions in emissions are important.

³ DEIR section 5.7, GHG and Energy, Table 5.7-3, *Communitywide Greenhouse GHG Emissions by Sector In Elk Grove City Limits, 2005-201*

⁴ DEIR, Appendix D, Greenhouse Gases, Table 15, *On-Road Vehicles Legislative-Adjusted Business-As-Usual Emissions Forecasts (2013-2050) (MTCO_{2e}/year*

⁵ DEIR, Table 5.13-9, *Existing and Projected Daily VMT*

⁶ DEIR Section 5.13, Transportation; Figure 5.13-14, Residential and Work VMT by Traffic Analysis Zone

Letter 5 continued

City of Elk Grove
September 26, 2018

Page 3

upgrading pedestrian and bicycle facilities, constructing upgraded and additional public transit facilities, installing additional public vehicle charging stations, and other measures.”⁷

**5-4
cont.**

VMT Mitigation

As noted above, large areas of the City will not comply with the requirements of SB 375. Regarding this problem, the DEIR states,

“...new land use plans or development projects must demonstrate through the [City’s Transportation Analysis Guidelines] that VMT produced by the proposed project does not exceed established VMT limits”⁹.

5-5

The draft Transportation Guidelines present a protocol for evaluating potential VMT impacts from future development, and identify general VMT-reduction strategies under the categories of Land Use/Location, Site Enhancement, Transit System Improvement, Commute Trip Reduction, and In-Lieu Fees.¹⁰ They are thus a critical element of the City’s GHG reduction strategy, and we anticipate further review during the City’s administrative process.

Thank you for your consideration of our comments. We expect to participate in the City’s review process and to comment further on the CAP document, and look forward to dialoging with the City regarding this important initiative.

Sincerely,



Laurie Litman, President
350 Sacramento

cc: 350 Sac CAP Team members

⁷ DEIR Section 7.0, Alternatives; pg. 7.0-19.

⁹ DEIR Section 5.13, Transportation; pg. 5.13-56

¹⁰ DEIR Section 5.13, Transportation; Table 5.13-10, *VMT Reduction Strategies*, pg. 5.13-59

Letter 5 – 350 Sacramento**Response 5-1:**

The commenter states the Draft EIR focuses on meeting state climate-change requirements in order to streamline future project-specific greenhouse gas (GHG) analysis and that this is a reasonable approach from an administrative standpoint. The commenter also urges the City to join other California jurisdictions in committing to the most aggressive climate change policy feasible. This comment is introductory in nature and does not address any specific analysis or conclusion in the Draft EIR regarding the GHG analysis. No further response is required.

Response 5-2:

The commenter urges Alternative 2 (Additional Climate Action Plan) to be adopted and suggests that the arguments that discount Alternative 2 are not compelling. Under Alternative 2, the City would adopt additional measures in the Climate Action Plan (CAP) that would further exceed established GHG reduction targets for 2020 and 2030 and allow the City to meet the State's targets for 2050. The Draft EIR concludes that GHG emissions are a less than significant impact for 2020 and 2030 but a significant and unavoidable impact for 2050 due to uncertainty regarding availability of measures to reach 2050 emissions reduction targets. Additional measures may include, but are not limited to, CALGreen Tier 1/NetZero by 2020, additional transportation sector measures, a direct offset program, and other emissions reduction options considered as part of the Project but not included in the proposed CAP.

The commenter has mischaracterized the approach to the assessment for Alternative 2. The Draft EIR did not "reject" Alternative 2 but provided an analysis of the comparative merits of this Alternative, as required under CEQA. An analysis of the impacts of Alternative 2 compared to those of the proposed Project was provided in the Draft EIR in Section 7.0, Project Alternatives, on pages 7.0-18 through 7.0-20 and addressed all topics, not just GHGs. The Draft EIR provided reasoned explanations how Alternative 2 would or would not avoid or reduce environmental impacts compared to the proposed Project. Alternative 2 is a "build" alternative. As stated on page 7.0-27, Alternative 2 would have the same footprint and similar impacts to those of the proposed Project. It would, however, have reduced air and GHG emissions over the coming decades and would increase the probability of achieving 2050 GHG emissions reduction targets. Alternative 2, like Alternatives 4 and 5, was not identified as an environmentally superior alternative because, as stated on page 7.0-28, it is not substantially different from the proposed Project or each other. Because of the fundamental nature of the General Plan, each of the alternatives involves continued development and population increases, and none of the alternatives would avoid potentially significant impacts or avoid impacts characterized as unavoidable.

The City acknowledges the commenter's support for Alternative 2 and disagreement with the explanation provided in the Draft EIR regarding the efficacy of Alternative 2 in achieving GHG reductions. The comment suggests that the City should apply greenhouse gas (GHG) reduction measures that are available now and have known efficacies. While the longer-term 2050 goal is not met through combined legislative and local actions, the Climate Action Plan (CAP) demonstrates substantial progress towards achieving this goal. However, this goal is not codified in law and the longest-term legislatively-mandated GHG reduction target is adopted for 2030. As stated on page 5.7-37 of the Draft EIR, "the State has not yet proposed a detailed update to the Scoping Plan for future targets that may be adopted beyond 2030 on the path to meeting the 2050 goal." Further, the Draft EIR in both Section 5.7, "Greenhouse Gas Emissions and Energy" and page 7.0-20 conclude that because GHG reductions cannot be substantiated to meet the

4.0 COMMENTS AND RESPONSES

2050 goal, the impact is significant and unavoidable. However, as demonstrated in Table 5.7-6 of Section 5.7, currently-available and feasible GHG reduction measures are anticipated to reduce the city's GHG emissions to meet both the 2020 and 2030 reduction targets. The Draft EIR's conclusion to the impact of the Project on climate change does not negate the City's commitment to implement the CAP, but rather, acknowledges that the CAP cannot solve all the City's GHG emissions challenges for the next 30-plus years.

The decision whether to reject Alternative 2 as a feasible alternative is at the discretion of the City Council, which will use the analysis presented in the Draft EIR to inform that decision.

Response 5-3:

The commenter expresses concern that the Project will result in an increase in GHG emissions, a doubling of vehicle miles traveled (VMT), and Senate Bill (SB) 375 requirements will not be met.

The commenter's statement regarding the increase in GHG emissions cites Table 15 of Appendix D of the Draft EIR. This table demonstrates the GHG emissions forecasts with legislative reductions but without the measures that are included in the CAP. Under the Project, GHG emissions associated with on-road vehicle travel would be decreased through implementation of the measures included in the CAP. As shown in Table 5.7-6 in the Draft EIR, there are several GHG reduction measures that aim to reduce on-road vehicle travel emissions. These measures would reduce GHG emissions by 28,979 metric tons of carbon dioxide equivalent (MTCO_{2e}) by 2020 and 45,328 MTCO_{2e} by 2030. Citywide, GHG emissions would be 876,070 MTCO_{2e} by 2030, which is a reduction of 42,720 MTCO_{2e} from the 2013 baseline of 918,790 MTCO_{2e}, despite growth in population, employment, and housing in the City.

The commenter claims that VMT would be doubled under implementation of the Project, citing Table 5.13-9 of the Draft EIR. The VMT associated with full buildout of the General Plan Update would result in annual VMT of approximately 6,875,000. However, this projection does not include implementation of the VMT-reducing measures of the CAP. There are several GHG reducing measures in the CAP that are based upon reductions in VMT, such as TACM-1, TACM-2, TACM-3, TACM-4, TACM-5, TACM-6, and TACM-7. These measures are collectively anticipated to reduce daily VMT by 273,435 by 2020 and 390,488 by 2030. These reductions in VMT can be found in Appendix D of the Draft EIR.

The commenter suggests that large areas of the City will generate substantially more VMT than permissible under the requirements of SB 375, and refers to Figure 5.13-14 of Section 5.13, Transportation, in the Draft EIR. SB 375, as described on page 5.7-12 of Section 5.7, "Greenhouse Gas Emissions and Energy" requires the California Air Resources Board and Metropolitan Planning Agencies to set regional VMT reduction targets for 2020 and 2035 to reduce GHG emissions.

Figure 5.13-14 shows that specific areas of the City that exceed the 15 percent reduction in VMT pursuant to Policy MOB-1-1 of the General Plan Update. Those areas which exceed this threshold would be required to conduct a VMT analysis as described in the Transportation Analysis Guidelines. As stated on page 5.13-55 of the Draft EIR, "Areas shown in green exceed the 15 percent per service volume threshold and would require project modification or other reduction strategies to satisfy the threshold." All new land use and transportation projects are required to comply with the VMT reductions required by MOB-1-1, which is consistent with guidance issued by OPR pursuant to the requirements of SB 743 and would result in a 15 percent reduction of project VMT over baseline conditions. The Draft CAP Update also includes Transportation Alternatives and Congestion Management (TACM) Measure 6, Limit Vehicle Miles Traveled, which is consistent with General Plan Policy MOB 1-1. While the Draft EIR identifies areas in the

City where the 15 percent reduction in VMT would be exceeded without mitigation, projects in those areas would be subject to project modification or other reduction strategies to satisfy the threshold. Therefore, those areas would not exceed the VMT requirements of SB 375. The issues raised by the commenter and the City's responses to those issues, which clarify and elaborate on information presented in the Draft EIR, do not affect the conclusions of the analysis in the Draft EIR.

Response 5-4:

The commenter suggests, under the subheading "Potential Additional Measures," that additional GHG emission reduction measures not included in the CAP but identified under Alternative 2, would reduce VMT and GHG emissions. The additional reduction measures included on page 7.0-19 in Section 7.0, Alternatives include additional building requirements and additional transportation sector measures that would get the City closer to its longer-term 2050 goal. The City is adding additional GHG reduction measures to the CAP, which include minimum standards for electric vehicle charging stations at new multifamily and nonresidential projects, as well as building electrification and solar PV programs. The addition of these measures would result in additional GHG reductions; however, based on the uncertainty of achieving the 2050 emissions reduction targets, like proposed Project, GHG emissions under Alternative 2 would be significant and may be unavoidable.

Response 5-5:

The commenter reiterates a previous statement that the City will not be able to comply with the requirements of SB 375. Refer to Response 5-3. The commenter also notes that the draft Transportation Analysis Guidelines will provide VMT-reduction strategies that are thus part of the City's GHG reduction strategy and suggests that they will be used during the City's administrative process. The commenter appears to be referring to project-level reviews for consistency with the Transportation Analysis Guidelines that would occur during the administration of the development review process, which the City agrees would contribute to the VMT reductions and associated GHG reductions that would result from such project-level analysis and compliance, and which are assumed under the Draft EIR's analysis of MOB 1-1 and CAP GHG Reduction Measure TACM-6. This comment is of a general nature and does not address any specific analysis in the Draft EIR or its conclusions. No changes to the Draft EIR analysis or conclusions are required as a result of this comment.

Letter 6

From: [Suzanne Pecci](#)
To: [Christopher Jordan](#)
Subject: Fwd: Comment on DEIR for General Plan Update
Date: Wednesday, September 26, 2018 5:06:51 PM

Begin forwarded message:

From: Suzanne Pecci <slpecci@aol.com>
Subject: Comment on DEIR for General Plan Update
Date: September 26, 2018 at 4:28:54 PM PDT
To: cjordan@elkgrovecity.org

Following are my comments:

5.9 Hydrology and Water Quality, **Groundwater Supply and Use, Groundwater Management**

Comment: Amend this part for accuracy to read as follows: *Including First Amendment of 1-11-17 where the City shall appoint a City Representative and an elected member of the governing board of Florin Resource Conservation District or designated employee of FRCD/EGWD to serve on the board which the City did by Resolution passed and adopted on July 11, 2018.* The City is a current member of SCGA.

6-1

5.9-38 Existing Laws and Proposed General Plan Policies that Provide Mitigation Policy INF -1-1 Comment: delete *'or shall be assured through the use of bonds or other sureties to the City's satisfaction.'* This is not in compliance; with Senate Bill 610 requiring the identification of an available water supplies for existing urbanization and foreseeable growth for 20 years into the future and requires collaboration between cities and counties and water suppliers; California Water Code 10910 thru 10915 which requires coordination between land use and public water purveyors; SB 221 requiring approval by a city or county of written verification of sufficient water supply to ensure collaboration; Water Forum Agreement 2000 updated 10-2015 Amendment IV, Relationship of WFA to Land use Decision Making (2-2002) Noting that FRCD/EGWD/EGWS is a Successor in Interest and OHWD is a Signatory of the WFA, both being named as water purveyors in the City and the Planning Area respectively.

6-2

5.9-41 **5.9.7 Cumulative Groundwater use** -Amend these discussions so that they comply with all laws of the State of CA, including SGMA -the idea that the proposed Project (meaning the General Plan of the City) could increase demand for water resource and result in withdrawal that exceeds the sustainable yield of the Basin of 273,000 which is potentially cumulative and considerable.

6-3

MM 5.12.1.1 discussion of how insufficient water supplies availability to meet the demand of new development in the Planning Area in addition to existing and planned development ...and how it would be managed to ensure compliance with the WFA" is not within the purview of the city to

6-4

Letter 6 continued

implement'—posing cumulatively, considerable , and unavoidable impact would be **significant and unavoidable**.

Comment: The City of Elk Grove cannot simply walk away from its responsibilities to work with the county and other cities in the Region to comply with the Sustainable Groundwater Management. This “Blackmail” approach that the city is taking jeopardizes the Region and invites take over by the Department of Water Resources. It is a bullying tactic, in my opinion, that could back fire with potential consequences to all the water users in the City and the Planning Area. A reminder that the City is a member of the SCGA as discussed previously and a Successor Interest to the Water Forum. I do not feel that by abdicating this role as a responsible agency in the region and simply saying “not within the purview of the City to implement”, takes the City out of the loop and somehow allows the city to be an innocent bystander in creating a problem for the region that the City takes no responsibility for by refusing to coordinate and collaborate according to the many laws of the State. The city is not just an observer, in assuring sustainable water planning for residents of the City.

Importantly, the Water Forum Agreement provides that LAFCo may impose conditions on SOI approval that future annexations will have to be consistent with WFA and potentially provide additional data on how the Area will be served by water.

Please confirm receipt of my comments upon receipt, as I had a problem getting earlier General Plan comments to you by e-mail a few weeks ago and provider you with a hard copy at the meeting. Comments sent Wed. 9/26/18 at 4:27 PM

Thank you
Suzanne Pecci
specci@aol.com

Suzanne Pecci
specci@aol.com

**6-4
cont.**

4.0 COMMENTS AND RESPONSES

Letter 6 – Suzanne Pecci

Response 6-1:

The commenter requests that information be added to the “Groundwater Management” subsection of the “Groundwater Supply and Use” subsection in Section 5.9, Hydrology and Water Quality, in the Draft EIR. These subsections, on page 5.9-18 in the Draft EIR, summarize information about how groundwater supply is managed by the Sacramento Central Groundwater Authority (SCGA) and requirements of the 2014 Sustainable Groundwater Management Act. In response to this comment, the following revision has been added following the second sentence of the first paragraph on page 5.9-18 of the Draft EIR:

The City does not directly manage groundwater supplies. The Sacramento Central Groundwater Authority (SCGA) manages groundwater in the Central Basin portion of the South American Subbasin. The SCGA was formed in 2006 through a joint powers agreement signed by the cities of Elk Grove, Folsom, Rancho Cordova, and Sacramento, and Sacramento County. The City is a member of the SCGA with a board seat, and also appoints an elected member of the governing board of the Florin Resource Conservation District (FRCD) or designated employee of the FRCD/Elk Grove Water District to serve on the Board, which the City did in July 2018.

Response 6-2:

The commenter raises a concern with General Plan Update Policy INF-1-1. The Draft EIR does not quote the correct text that can be found in the draft General Plan. The text in Policy INF-1-1 on page 5.9-31 has been amended as follows:

Water supply and delivery systems shall be available in time to meet the demand created by new development, ~~or shall be assured through the use of bonds or other sureties to the City's satisfaction.~~

Response 6-3:

The commenter states the Impact 5.9.7 in the Draft EIR should be amended to comply with the laws of the State. The Draft EIR conservatively assumes that because demand from the Study Areas was not included in SCWA's projections, additional groundwater production may result in withdrawals that exceed the 273,000 acre-feet annual sustainable yield. However, as discussed on Draft EIR page 5.9-45, provision of groundwater would be at the discretion of the SCWA. As a signatory to the Water Forum Agreement, SCWA would not be able to exceed the annual sustainable yield amount without amendments to the Water Forum Agreement.

Response 6-4:

The commenter is of the opinion the City is not taking responsibility for coordinating and collaborating with Sacramento County and other cities in the region concerning groundwater management. The commenter also states the Water Forum Agreement provides that LAFCo may impose conditions on SOI approvals regarding water supply. While this is a general comment and is not directed to the analysis or conclusions in the Draft EIR concerning water supply, it should be noted that policy LU-3-36 has been amended to require that, at the time of annexation, the Groundwater Sustainability Plan, as applicable, and the applicable water purveyor's water master plan(s) identify available water supply for the annexation project. No further response is required.

7 - DEIR Meeting Transcript

General Plan Update EIR – Public Comment Meeting Transcript

Susan Pecci:

For the record my name is Susan Pecci and I live in the rural area on the urban services boundary. So some of the issues and comments that I have made are with respect with living on that edge of the between of the City of Elk Grove and Sacramento county. I forwarded my comment to the planning commission thinking that it was a full meeting and, so Christopher gave you all a copy of mine... So the first thing that I wanted to talk about a comment on DEIR 5.2 agriculture resources 5.2-to regulatory framework. Titled: Local City of Elk Grove Municipal Code. And the discussion talks about the adoption, the incorporation of the city and - I want - the right to farm and the adoption of the county ordinance right to farm as a city regulation.

My first comment is that when I looked in the reference section following that, um, section on agriculture resources I didn't see a copy of either the county ordinance, the right to farm, or the city regulation right to farm. And I think it would be good to have in the references so people could actually read what the right to farm says.

Another, I forwarded a copy of the brochure that I received on UC Davis which talks about what the right to farm really is. And the right to farm is not just giving farmers the right to farm to preserve agriculture, it's also to establish good neighbors between the urban and the rural connection point. It is about establishing statute of limitations if in fact farming activities become a nuisance. It is about the right of people to file complaints with the agriculture commissioner, and so all of these things kind of go into that, I's not just about everybody's ability to grow on their property.

I know that in the rural area people are thinking right farming you can have fruit trees on your land five acres or two acres, and in my estimation and my opinion that's not what it is. So I forwarded that copy uh, to the, all of the, uh, planning commissioners, and I'll give you a copy of that to kind of think about, to see if maybe some of that wording can be incorporated a little bit more into the body of the uh EIR document.

The next section is impact 5.2-2 complex resulting in conversion of farmland in non-agricultural use. I live in the urban services boundary which is that connection between urban and rural, and I live on five acres. I lived there for thirty years, and it has been the land behind me, the land behind me has been a dairy, it's been perennial crops, it's been nothing, it's been hay, it's been a lot of things, and recently it went into grapes, and it seems bucolic, and it seems like it's something that would be great to look at, and they are. But there are um, I've learned a lot about grapes, and I learned about living on that rural edge, and I really learned what agriculture means to those of us that live along there, there're seven of us lot owners that live back right up to the vineyard and so I have worked

PC-1

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with the agriculture commissioner, and I worked through DPR and the farmer. And we have resolved the issues to respect to the type of pesticides that are used, spray patterns and where they do their work, and were they park their porta-potties, so we've been able to work it out. But that's kind of what the urban/rural edge is even when you live on 5 acres. You still are not used to this type of activity. So that's something that I'd like you really look at too. You've had that impact as less than significant, that's more that, it is significant. And especially if you look at, the fact that the land that's in the flood plain is still intended to be farmed.

There is a lot of farming and a lot of farming activities out there, which is great. You look at the general plan of the county, Sacramento, and they really have done - they have really tried to introduce that as being a new, a wine country in this area. So, a lot of the activities in the general plan for the city of Sacramento, a lot of the things that farmers can do out there, which is fine, is by right. But that is going to impact all of us that don't have the rights that farmers do, and there can be manufacturing, food processing, wine events, a lot of things that are done by right, and the, let me get back to buffers. The better the buffers, the better the distance, and in my opinion the better the neighbors. So I'll pass it on to somebody else and I have another comment later, ok.

The next comment I have is on ground water supply and demand. Protections 5.9-19, and I'm just going to read what my comment is, the sentence is not correct in my opinion, and it should read: within the planning area boundaries its shown in figure 5.9-4 SCWA is the service provider. You had said that there is three service providers within that planning area, and I double checked the map and those planning areas are all outside the city limits. The other two service providers that you named Elk Grove Water District is not a service provider in that area. They would have to submit an application to LAFCO to expand their boundaries and to date, to my knowledge, they have not done that and that's very public process of outreach that hasn't been performed in the City. The other one you mentioned is Omochumne-Hartnell Water District and while they have those latent powers to purvey water they need to contract with a service provider. Again to my knowledge, to initiate those latent powers is a LAFCO process, and I'm talking with LAFCO, that has not been done today, again that's a public outreach and those of us that live in Omochumne-Hartnell district out there and there are a lot of Ag Res on five acres. That will be an outreach process not only for us who live within the district, but also to the rest of the city, that is part of the general plan if in fact this area is annexed within the city at some point and time.

The other sentence, there is a second sentence to that paragraph, it says only the SCWA and EGWD which you had named previously as water providers in that area, again which they are not in that time, extract ground water as part of their supply. I really didn't understand what that means by supplies, so what are supplies? Omochumne-Hartnell now is an Ag water district, they pump water, they have riparian rights along the river and at times when they can divert surface water, and when its available they do. So, what does

PC-1
cont.

PC-2

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that mean, what are the supplies of OHWD? Are they ground water pumping, are we talking surface water, are we talking some kind of a contract to transfer or sell water? Really I think it needs to be clarified, what are the supplies of these two that are not the purveyors in that area.

The next section is 5.9-36 and 37. Impact 5.9.4 states: The City would not direct how water supplies would be managed, it is conservatively as you said, assumes that the study area demand will be served entirely by ground water. The additional demand when added to historic highs 34,600 acre feet annually could exceed SCWA's projection of available water volume in 2020 and 2025 but may be accommodated beyond that. However, the estimate doesn't account for cumulative future demand on groundwater supplies. So, the question is what's the alternative plan. If it's SCWA area, if OH and EG and Elk Grove Water District are not water service providers, or is there some kind of plan that could be developed and pick up the slack, if in fact SCWA cannot provide the water for that area? That's the question, and can you just clarify it because it just leads the reader wanting to know, what, what is the plan?

The next one is 5.9-38 conclusion: The last two sentences say quote: as of the time of the preparation of this draft EIR DWR has not approved a sustainable ground water management plan for the South American Basin. As such the proposed project would not conflict with the plan. So, there is no conflict with the plan because the area is really not included with the plan. But it does not preclude the fact that just because it's not the plan it won't have an impact. What is the impact on ground water, it's not in the plan. And if the plan is approved and outside, how will that be dealt with, what does that mean to all of us using ground water?

So, I think that's pretty much it and I just had one more comment regarding the Wilton Rancheria. I note that there isn't any section at all in that planning, in this EIR. At least I haven't found it - I'm working my way through it -that gives any information on water supply for the casino. And I know that this is a big a part of the vision of Elk Grove, and the FEIS and DEIS for this project were for water to be provided by SCWA and the infrastructure was for the mall and not for a casino. Will there be a section at all for the water for the casino? It is planned and lots of approvals have been made. And also some discussion to their sovereign water rights and they have water rights in the Cosumnes. And also there has been a lot of recent case law on how this ground water rights of tribes can impact ground water, and I think that, maybe, there should be a little bit of discussion on that because it's certainly seems to be a big part of the plan for Elk Grove, thank you.

Lynn Wheat

Hi my name is Lynn Wheat citizen planner, and I will begin with the introduction where I have submitted comments on the NOP and it said the location where I could find my comments addressed. And I appreciate that they identify the sections, but I would like page

**PC-2
cont.**

PC-3

7 - DEIR Meeting Transcript continued

numbers included in that. Ok so the sections and the final EIR can be numbered as well as identified, that would help.

PC-3
cont.

So my first comment is that they did in the air quality study, they did some measurements at some stations, and one was located at Bruceville south of Lambert, which is not highly developed at this time. And the other area was City of Sacramento in T Street. I would like for the air quality study to look at areas within our city such as maybe around Civic Center Drive where we're going to have traffic impacts with our new Costco. Also, within the document on traffic study, it identified studies that were used, I would like to see the City's citizen survey that is done, that's the study. And it identifies exactly how many of our residents use cars as our primary modes of transportation.

PC-4

Now I appreciate that within the DEIR that suburban propane is mentioned within our hazardous section of this document, however I do not believe that my comments on the NOP were actually included in the DEIR or evaluated such as take proactive approach to risk assessment to the propane, and in particular referred to the 2017 county, Sacramento County Local Housing medication Plan, and Appendix B. I believe is where Elk Grove is listed and it is cited. However, the studies that have been used and have been referenced in the DEIR were from the early 2000s. And since that time studies on propane tanks and facilities of that such have been completed that there was a study done and I would actually like more studies referenced in our final EIR.

PC-5

I would to have like something done as was done in Roseville where they, in our changing world, have identified terrorism as a threat and have it in their plan. It's not required by the federal Government or the state, but I would like our city and that's what I mean proactive to identify that. The reason being is that our City received a grant through homeland security, and we have used those monies and grants to come up with some evacuation plans, and to identify risks within our area, Sacramento Elk Grove area, and so I will say that within that there where, in the United States there were sixty-four cities of highest risk in urban areas, and there were ten in tier one that were identified, and there were fifty-four in tier two, of which Elk Grove was one of those. So, to not identify not identify that and ignore that when we are urbanizing and bringing in denser population within that area is a concern to me. Even within our Elk Grove safety element, amendments through 2016, it refuses to identify that as a special risk. So that again I would like some elaboration within the final EIR on my NOP comments.

PC-6

I needed to look at this a little bit closer but I realize we are doing a two hundred year flood mapping. I have a comment here that it should be completed within two to three months and I don't know if that's been done within the time that this particular document has been under way, but if indeed it has, I would like to see that within our final EIR and just a comment that I know that's not going to change in our facts of finding and overriding considerations. I am very disappointed that we're still going to have traffic as that, and the mitigations we're using if you look at our citizen survey and just asses our community are

PC-7

PC-8

7 - DEIR Meeting Transcript continued

not practical. So I think we need to look at it in a different way. Our public transportation system runs at a deficit, it's not well linked within our community and not used. So, I do not believe that that is a realistic mitigation, and I would like other mitigations to be considered.

**PC-8
cont.**

Getting back to air quality, trees are being used as a mitigation. Well when we are narrowing our walkways along streets, trees are not really successful. And we have lost some of our bigger trees within our City. And then trees planted in some other areas had to be removed because of the sidewalks, so uprooting the sidewalks.

PC-9

So again I'll be submitting written comments. I need to get through this but this is just off the top of my head. I'm going through my NOP comments. Thank you.

PC-10

PC – DEIR Public Comment Workshop Comments Transcript

Response PC-1:

The comment is related to living in the rural area of the City and effects of farming activities in these rural areas. The commenter states the City's regulation regarding the right to farm should be included in the EIR. As stated in Response 2-1, CEQA Guidelines Section 15148 (Citation) establishes that "preparation of EIRs is dependent upon information from many sources.... These documents should be cited but not included in the EIR." The Draft EIR has complied with this requirement. For reference, Title 14 of the City's Municipal Code can be found at <https://www.codepublishing.com/CA/ElkGrove/#!/ElkGrove14/ElkGrove14.html>.

The commenter continues that the right to farm, based on information from UC Davis, that the right to farm is not about preservation of agriculture, but it is also to establish good neighbors. To the contrary, as stated on Draft EIR page 5.2-18, City of Elk Grove Municipal Code Chapter 14.05, Agricultural Activities, is intended to ensure that agricultural operations that are operated in a manner consistent with proper and accepted customs and standards are allowed to continue and requires that notification be provided to residents of property located near properties designated for agricultural use, that these agricultural uses are encouraged, that accepted agricultural practices may continue, and that efforts to prohibit, ban, restrict, or otherwise eliminate established agricultural uses will not be favorably received. It also includes notification and mediation procedures for cases in which agricultural activities are not being conducted in a reasonable manner, or when the operator of an agricultural operation is not using currently acceptable methods in the conduct of the farm. Thus, while the Code does provide a remedy for impacts due to improper agricultural operations, it is not intended to protect adjacent uses from proper and reasonable agricultural operations. It should also be noted that the commenter is referring to an existing condition. The Project is not responsible for improving existing conditions.

Response PC-2:

The commenter refers to groundwater supply and demand, which are based upon written comments submitted by the commenter. Refer to Responses 6-1 through 6-4.

Response PC-3:

The commenter requests that the page numbers in the Draft EIR where her NOP comments were addressed be included in the EIR. CEQA Guidelines Section 15084(c) establishes the Lead Agency must consider all information and comments received. Table 1.0-1 in Section 1.0, Introduction, summarized NOP comments received and where the topic was addressed in the Draft EIR. The table format is intended to allow a commenter to find where in the EIR a topic was addressed; there are no requirements under CEQA that page numbers be included. For the Final EIR, a list of all persons submitting written comments on the Draft EIR is included in Section 3.0, and each letter is assigned a letter or a number. Responses are provided in this section (Section 4.0). The commenter's letter is Letter 2, which can be readily found in this section.

Response PC-4:

The commenter requests the air quality analysis to address specific areas in the City, such as Civic Center Drive near Costco. As discussed in Response 2-6, the data provided in Table 5.3-4, obtained from SMAQMD's Air Quality Monitoring Stations, is sufficient to inform the analysis contained in Chapter 5.3 of the Draft EIR. The commenter also requests that the traffic study

include the citizen survey. The comment does not state how the survey relates to environmental impacts disclosed in the EIR or the conclusions of the impact analysis. No changes to the Draft EIR are required.

Response PC-5:

The comment is related to potential hazards at the Suburban Propane facility. Refer to Responses 2-17a through f.

Response PC-6:

The commenter recommends that the City should identify terrorism as a threat and include it in presumably what the commenter is referring to as the City's Local Hazard Mitigation Plan, similar to what Roseville has done. This is a planning consideration that does not require analysis in the Draft EIR. See Responses 2-17a, 2-17d, and 2-17e.

Response PC-7:

The commenter requests that information be added to the Final EIR concerning 200-year floodplain mapping, indicating that mapping should be done "within two to three months." The map has since been updated and is shown in Chapter 2.0, Errata. The Draft EIR (page 5.9-6) described the then-current status of floodplain mapping and states that the City recognizes that flood risk conditions can change over time through natural processes or project improvements on the local or regional scale. The 200-year flood map is considered the base case for establishing potential flood risk. The City will keep updated data on the 200-year floodplain through an annual review, accounting for the results of new technical studies and changes in flood protection infrastructure. This updated information will be referenced during the development review process for areas on the base case 200-year flood map, as shown in the updated Figure 5.9-3 in Chapter 2.0, Errata, of this Final EIR. The Draft EIR concluded flood hazard impacts would be less than significant with implementation of General Plan policies and Municipal Code requirements (Draft EIR page 5.9-36) and no mitigation measures are required. As a point of clarification, because there would not be a significant impact requiring mitigation, the City would not have to make Findings or adopt a Statement of Overriding Considerations for this impact.

Response PC-8:

The commenter expresses disappointment that there will be traffic, and that public transit runs at a deficit and is not used or well linked with the community. The commenter requests other mitigation to be considered. See Response 2-14, which addresses traffic and transit. The commenter's disagreement with the effectiveness of mitigation is noted. However, the commenter did not suggest alternate or additional mitigation that should have been considered. See Response 2-16, which addresses the citizen survey.

Response PC-9:

The commenter states trees are being used as mitigation for air quality but expresses concern that trees are removed because the roots damage sidewalks. This is not a comment on the adequacy of the Draft EIR or its conclusions. No further response is required.

4.0 COMMENTS AND RESPONSES

Response PC-10:

The commenter states she will be submitting written comments. Responses to written comments submitted by the commenter are provided in Responses 2-1 through 2-21.

**THE CITY OF ELK GROVE FINDINGS REQUIRED UNDER
THE CALIFORNIA ENVIRONMENTAL QUALITY ACT
(Public Resources Code Section 21000 et seq.)**

I. Introduction

The City of Elk Grove (City) prepared a Final Environmental Impact Report (EIR) for the proposed City of Elk Grove General Plan Update Project (Project).

The EIR addresses the potential environmental effects associated with implementation of the City's General Plan Update. The EIR focuses on impacts from changes to land use associated with buildout of the proposed land use maps (Draft EIR Figure 2.0-3) and impacts from the resultant population and employment growth in the City's current Planning Area and the four Study Areas. The General Plan Update's buildout would allow for a total population in the City of approximately 329,238 with up to 101,931 dwelling units and 122,802 jobs on 34,956 acres. In addition to the General Plan Update, which includes updates to the land use diagram, the General Plan Update Project includes the following related components: Climate Action Plan Update; Specific Plan Amendments; Zoning Code Amendments; and Parks and Recreation Master Plan Update.

The Findings and Statement of Overriding Considerations set forth below (Findings) are presented for adoption by the City Council, as the City's findings under the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) relating to the Project. The Findings provide the written analysis and conclusions of this Council regarding the Project's environmental impacts, mitigation measures, alternatives to the Project, and the overriding considerations, which in this Council's view justify approval of the City of Elk Grove General Plan Update Project, despite environmental effects.

II. General Findings and Overview

A. Procedural Background

In accordance with Section 15082 of the CEQA Guidelines, the City prepared a Notice of Preparation (NOP) of an EIR for the Project on June 23, 2017. This notice was circulated to the public, local, State, and federal agencies, and other interested parties to solicit comments on the Project. After initial review of the Project, the City determined that an EIR should be prepared and therefore no initial study was prepared and is not required, pursuant to CEQA Guidelines Section 15063(a). The City held an EIR scoping meeting on July 11, 2017, pursuant to Public Resources Code Section 21083.9 and CEQA Guidelines Section 15083. The 60-day review period for the Draft EIR (State Clearinghouse Number 2017062058) began on July 27, 2018 and ended on September 26, 2018.

The City prepared written responses to the comments received during the comment period and included these responses in a separate volume entitled City of Elk Grove General Plan Update Project Final Environmental Impact Report. The Final EIR provides a list of those who commented on the DEIR, copies of written comments (coded for reference), and written responses to comments regarding the environmental review. The Final EIR was made available for public review on **January 4, 2019**.

B. Record of Proceedings and Custodian of Record

For purposes of CEQA and the findings set forth herein, the record of proceedings for the City's findings and determinations consists of the following documents and testimony, at a minimum:

- The NOP, comments received on the NOP, and all other public notices issued by the City in relation to the City of Elk Grove General Plan Update Project EIR (e.g., Notice of Availability).
- The City of Elk Grove General Plan Update Project Draft EIR, associated appendices to the Draft EIR, and technical materials cited in the Draft EIR.
- The City of Elk Grove General Plan Update Project Final EIR, including comment letters, and technical materials cited in the Final EIR.
- All non-draft and/or non-confidential reports and memoranda prepared by the City and consultants related to the Project or any of the above associated environmental documents.
- Minutes and/or transcripts of the discussions regarding the Project and/or Project components at public hearings held by the City of Elk Grove Planning Commission and City Council.
- Staff reports associated with Planning Commission and City Council meetings on the Project.
- Those categories of materials identified in Public Resources Code Section 21167.6.

The City Clerk is the custodian of the administrative record. The documents and materials that constitute the administrative record are available for review at the City of Elk Grove offices located at 8401 Laguna Palms Way, Elk Grove, California, 95758.

C. Consideration of the Environmental Impact Report

In adopting these Findings, the City Council finds that the Final EIR was presented to this Council, the decision-making body of the lead agency, which reviewed and considered the information in the Final EIR prior to approving the City of Elk Grove General Plan Update Project. By these findings, the Council ratifies, adopts, and incorporates the analysis, explanations, findings, responses to comments, and conclusions of the Final EIR. The City Council finds that the Final EIR was completed in compliance with CEQA. The Final EIR represents the independent judgment of the City.

D. Severability

If any term, provision, or portion of these Findings or the application of these Findings to a particular situation is held by a court to be invalid, void, or unenforceable, the remaining provisions of these Findings, or their application to other actions related to the City of Elk Grove General Plan Update Project, shall continue in full force and effect unless amended or modified by the City.

E. Summary of Environmental Findings

The City Council has determined that based on all of the evidence presented, including, but not limited to, the EIR, written and oral testimony given at meetings and hearings, and submission of comments from the public, organizations, and regulatory agencies, and the responses prepared to the public comments, the following environmental impacts associated with the Project are:

1. Potentially Significant and Cannot be Avoided or Reduced to a Less Than Significant Level

Project-Specific

- Changes in visual character; and additional new sources of light and glare
- Conversion of Important Farmlands and/or lands under Williamson Act contracts to urban uses
- Short-term increases in criteria air pollutants due to construction activities
- Long-term increase in criteria air pollutant and ozone precursor emissions; and inconsistency with applicable air quality attainment plans
- Increased exposure of existing or planned sensitive receptors to stationary or mobile-source toxic air contaminant emissions
- Increased exposure of sensitive receptors to odorous emissions
- Direct and/or indirect effects on species listed as endangered, threatened, rare, proposed and candidate plants and wildlife
- Direct and/or indirect effects on species non-listed special-status species (Species of Special Concern, fully protected, and locally important)
- Generation of greenhouse gas emissions that cannot be reduced sufficiently with implementation of policies and programs included in the General Plan and Climate Action Plan (CAP) Update to meet the State's longer-term 2050 goal
- Increased demand on groundwater supplies, which could affect aquifer characteristics
- Increases in transportation noise, including traffic noise levels along many existing roadways in the City
- Increases in school-age children, resulting in the construction of new public-school facilities, the construction of which could result in environmental impacts
- Increased demand for domestic water supply, which may result in the need for additional water supplies; and construction of new and expanded water supply infrastructure, the construction of which could result in environmental impacts
- Addition of traffic to existing unacceptable conditions along State Route (SR) 99

Cumulative

- Contribution to cumulative changes in visual character and increases in nighttime lighting and glare
 - Contribution to cumulative loss of farmland in the region
 - Contribution to cumulative criteria air pollutant and ozone precursor emissions in the region
 - Contribution to cumulative impacts on biological resources in the region
 - Contribution to increased demand for groundwater, which could interfere with aquifer characteristics
 - Contribution to noise levels along many roadway segments in the Planning Area due to cumulative traffic volumes
 - Contribution to cumulative demand for new public schools, the construction of which could result in environmental impacts
 - Contribution to increased demand for domestic water supply
 - Contribution to increased demand for wastewater treatment, which could result in the need for facility improvements, the construction of which could result in environmental impacts
 - Contribution of traffic, resulting in unacceptable levels of service (LOS) at some intersections and some roadway segment
 - Contribution of traffic to existing unacceptable LOS F conditions along State Route 99 and Interstate 5 (I-5)
 - Increased vehicle miles traveled (VMT)
- 2. Potentially Significant Impacts That Can be Avoided or Reduced to a Less Than Significant Level Through Implementation of Mitigation Measures Identified in the General Plan Update Project EIR**

Project-Specific

- Potential impacts on cultural resources (historical resources, archaeological resources, tribal cultural resources, and human remains)
- Potential impacts on undiscovered unique paleontological resources in paleontologically sensitive rock formations
- Potential for inadvertent release of hazardous materials during ground disturbance and demolition activities if contaminants present and not properly managed

Cumulative

- Contribution to potential impacts on cultural resources (historical resources, archaeological resources, tribal cultural resources, and human remains)
- Contribution to potential impacts on undiscovered unique paleontological resources in paleontologically sensitive rock formations

3. Impacts That Are Less Than Significant and Less Than Cumulatively Considerable As Identified In the General Plan Project EIR

Project-Specific

- No impacts to designated scenic vistas or highways within view of the Planning Area.
- Less than significant impact from urban land activity types adjacent to primarily agricultural land activity types that would impair agricultural production and result in land use compatibility conflicts.
- Less than significant impacts from localized concentrations of mobile-source carbon monoxide.
- Less than significant impact from loss of riparian vegetation, sensitive natural communities, and/or state or federally protected wetlands.
- Less than significant impact to wildlife movement.
- Would not conflict with any local policies or ordinances protecting biological resources.
- Would not conflict with the provisions of an adopted habitat conservation plan.
- Less than significant impacts associated with seismic ground failure, including surface rupture, ground shaking, liquefaction, or landslides.
- Less than significant impacts from grading and excavation activities that could result in the potential for topsoil erosion.
- Less than significant impacts as a result of underlying expansive or unstable soil properties.
- Less than significant impacts from conditions where soils would not be capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.
- Future development that would occur under the proposed Project would result in GHG emissions reductions sufficient to meet GHG reduction targets and goals, which are consistent and aligned with the goals identified in the 2017 Scoping Plan to meet the statewide GHG emission reduction targets for 2020 and 2030, as established by AB 32 and SB 32.

- The Project would not result in a wasteful or inefficient use of transportation-related energy, nor would it conflict with State or local plans for renewable energy or energy efficiency.
- Less than significant impact from increases in hazardous materials used, stored, and transported in the Planning Area.
- Less than significant impact from hazardous materials emissions within one-quarter mile of existing schools.
- Would not impair or hinder emergency response or evacuation in the Planning Area.
- The proposed Project would not include development that could be subject to wildland fire hazard risk.
- Implementation of the proposed Project would not result in future development that would involve construction-related activities that could expose soil to erosion during storm events, causing degradation of water quality. Urban runoff from new projects in the Planning Area post construction would also not contribute pollutants that could affect surface water or groundwater quality.
- The proposed Project would not expose new development to flood hazard risk or cause new flooding or exacerbate flood hazards due to future development in 100- and/or 200-year flood zones.
- Less than significant impacts as a result of noise impacts due to construction activities.
- Less than significant impact from future non-transportation or stationary noise increases.
- Less than significant impact from construction activities that could expose receptors to excessive groundborne vibration, and new industrial and commercial land uses that could expose receptors to excessive groundborne vibration from long-term operations.
- Less than significant impact from an increased demand for fire protection and emergency medical services.
- Less than significant impact from an increased demand for law enforcement service.
- Less than significant impact from an increased need for park and recreation facilities and trails.
- Less than significant impact from increased wastewater generation and demand for wastewater treatment services.
- Less than significant impact from increased solid waste generation.
- Less than significant impact from increased demand for electric, natural gas, and telephone services.

- Changes in land use patterns would not negatively affect existing air traffic patterns.
- Less than significant impact from increases in hazards due to design features of transportation facilities.
- Less than significant impact as a result of increased travel demand on the transportation network.
- Less than significant impact as a result of increased travel demand on the transportation network and its effect on emergency access.
- Less than significant impact from conflicts with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities.

Cumulative

- The proposed Project would not contribute to cumulative geologic and soil impacts.
- The proposed Project would not substantially contribute to a substantial increase in risks as a result of the increase in use, storage, disposal, or transport of hazardous materials.
- Cumulative development would not result in construction activities that could temporarily affect roadways and increase the number of people who may need to evacuate the region in the event of an emergency.
- Cumulative development would not be subject to wildland fire hazard risk.
- Future projects that could be constructed in the Planning Area under the proposed Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems, or contribute additional sources of polluted runoff.
- The proposed Project would not substantially contribute to flood hazard risk, new flooding, or exacerbate flood hazards due to future development in 100- and/or 200-year flood zones.
- Implementation of the Project would not result in a substantial contribution to cumulative construction vibration and noise levels in the Project area.
- Less than cumulatively considerable impact from an increased demand for fire protection and emergency medical services.
- Less than cumulatively considerable impact from an increased demand for law enforcement service.
- Less than cumulatively considerable impact from an increased need for park and recreation facilities and trails.
- Less than cumulatively considerable impact from increased demand for hauling and disposal services for solid waste.

- Less than cumulatively considerable impact from increased demand for electric, natural gas, and telephone services.

III. Findings and Recommendations Regarding Significant and Unavoidable and Cumulatively Considerable Impacts

A. Aesthetics

1. Change in Visual Character (EIR Impact 5.1.2)

(a) Potential Impact. Buildout of the Planning Area would result in new development in currently undeveloped and rural areas, particularly in the Study Areas, and an increase in density in urbanized areas through infill development on currently vacant parcels. Such development would convert the visual character of these areas from agricultural fields, natural habitat, and vacant parcels to an urban/suburban developed character. Views of these undeveloped areas would be replaced by views of houses, office and commercial buildings, light industrial complexes, public facilities, and associated improvements including roads, parking lots, fencing, utilities, and ornamental landscaping. The conversion from the current rural/natural character to a more urbanized character would be substantial and permanent and is a potentially significant impact. See DEIR pages 5.1-8 and 5.1-9.

(b) Mitigation Measures. Development within the City is subject to discretionary Design Review pursuant to Municipal Code Section 23.16.080 (Design Review). All new development in the Planning Area would be required to comply with the City's Design Guidelines. General Plan goals and policies, including but not limited to Goal LU 5 (Consistent, High Quality Urban Design) and Policies LU-5-1 through LU-5-12 would ensure the compatibility of adjacent land uses, protection of residential neighborhoods from incompatible activities, and buffering of incompatible uses to retain the existing community character. Policies LU-1-5, NR-1-8, and NR-2-3 encourage development clustering where possible to protect scenic resources. In addition, the East, South, and West Study Areas are proposed to have agricultural buffers to provide a visual separation between future growth areas and the active agricultural uses outside the Planning Area. Additional policies (e.g., NR-1-4 and NR-1-8) require the protection of stream corridors, wetland features, native trees, and other natural resources. However, there is no additional feasible mitigation beyond compliance with the City's Design Guidelines, supplemental guidelines, and General Plan Update policies that would further lessen impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) Findings. Based on the EIR and the entire record before this City Council, this City Council finds that:

(1) No further mitigation. No additional feasible mitigation available beyond compliance with the City's Design Guidelines, supplemental guidelines, and proposed General Plan policies.

(2) Remaining Impacts. Development of the Project site, particularly in the Study Areas, would permanently alter the existing visual character of the

Project area from undeveloped land with open views to urban and developed. Any development of the site would permanently alter the undeveloped nature of the site, there are no additional feasible mitigation measures that would meet the objectives of the Project while maintaining the existing visual character of the site. This impact would remain significant and unavoidable.

- (3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from the change in existing visual character, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

2. Light and Glare (EIR Impact 5.1.3)

- (a) **Potential Impact.** Development would introduce new sources of nighttime lighting and illumination into the undeveloped or underutilized portions of the Planning Area. Additional nighttime lighting associated with future development in the Planning Area, particularly in the Study Areas where there is little nighttime lighting, would also contribute to skyglow conditions. Skyglow could be visible to residents in existing rural areas east of SR 99 with unobstructed views of the Planning Area (i.e., areas that currently appear "dark" to those observers would no longer appear dark). Skyglow effects may also be subjectively perceived as more prominent in communities such as Galt to the south because the source of nighttime lighting would be closer to the community. Increased skyglow resulting from new sources of nighttime lighting in the Planning Area could further diminish visibility of stars and other astronomical features within the Planning Area as well as in the region. Thus, the effects of skyglow could extend beyond the Planning Area, affecting rural areas and other jurisdictions, and is a potentially significant impact. See DEIR pages 5.1-9 through 5.1-11.
- (b) **Mitigation Measures.** Municipal Code Chapter 23.56 addresses standards for lighting as part of new development. The City's Design Guidelines require that exterior building and site lighting be designed so that light is not directed off site and the light source is shielded downward from direct off-site viewing. General Plan Update Policy LU-5-4 require that nonglare glass be used in all nonresidential buildings to reduce impacts from glare. However, there is no additional feasible mitigation beyond compliance with the City's Design Guidelines, supplemental guidelines, and General Plan Update policies that would further lessen impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.
- (c) **Findings.** Based on the EIR and the entire record before this City Council, this City Council finds that:
- (1) **No further mitigation.** No additional feasible mitigation available beyond compliance with the City's Design Guidelines, supplemental guidelines, and proposed General Plan policies.
- (2) **Remaining Impacts.** Compliance with the City's Design Guidelines, supplemental guidelines, and General Plan Update policies would reduce localized effects of light and glare, such as spillover light, associated with

development of individual projects within the Planning Area. There is no additional feasible mitigation that would reduce the Project's contribution of light and glare from future development throughout the City and its effects on skyglow and the impact would remain significant and unavoidable.

(3) Overriding Considerations. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from increases in light and glare in the Project area, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

3. Cumulative Visual Quality Impacts (EIR Impact 5.1.4)

(a) Potential Impact. Continued urbanization of the region in accordance with approved plans, together with cumulative development projects, would convert agricultural and open space land to urban uses with residential and nonresidential buildings and associated roadways and other infrastructure. Although individual development projects would be responsible for incorporating mitigation to minimize their visual impacts, the net result would be a general conversion of areas with an open, rural character to a more urban and developed character. The change in character associated with this development would be a significant cumulative impact. The Project would be a continuation of the overall urbanization of the City and would extend the City's developed area along the urban edge. While it is the City's intention to develop these areas, development under the Project, in combination with other development in the region, would permanently alter the character of lands with rural and agricultural visual character to urban developed uses. Therefore, the Project's contribution to the change in character is cumulatively considerable. See DEIR pages 5.1-12 and 5.1-13.

(b) Mitigation Measures. Compliance with the City's Design Guidelines, supplemental guidelines, and proposed General Plan policies would guide future projects to provide a quality visual character of future development. However, even with implementation of these guidelines and policies, future development would substantially change the visual character of the Planning Area and the Project's contribution to the urbanization of the region. However, there is no additional feasible mitigation beyond compliance with the City's Design Guidelines, supplemental guidelines, and General Plan Update policies that would further lessen the Project's contribution to cumulative visual resources impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) Findings. Based on the EIR and the entire record before this City Council, this City Council finds that:

(1) No further mitigation. Compliance with the City's Design Guidelines, supplemental guidelines, and proposed General Plan policies would guide future projects to provide a quality visual character of future development. However, even with implementation of these guidelines and policies, future development would substantially change the visual character of the Planning Area and the Project's contribution to the

urbanization of the region. No further feasible mitigation is available to reduce the Project's contribution to the regional change in visual character.

(2) Remaining Impacts. Compliance with the City's Design Guidelines, supplemental guidelines, and General Plan Update policies would guide future projects to provide a quality visual character of future development. However, even with implementation of these guidelines and policies, future development would substantially change the visual character of the Planning Area and the Project's contribution to the urbanization of the region. No further mitigation is available to reduce the Project's contribution to the regional change in visual character, and the cumulative impact would remain significant and unavoidable.

(3) Overriding Considerations. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative impact of the Project resulting from changes in visual quality in the Project area, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

5. Cumulative Light and Glare Impacts (EIR Impact 5.1.5)

(a) Potential Impact. Continued urbanization of the region in accordance with applicable land use plans, together with cumulative development projects, would introduce sources of light and glare to areas that currently contain few light sources. Development of the Capital SouthEast Connector project, as well as development in Rancho Cordova, the Delta Shores area of the City of Sacramento, and Folsom Ranch, would add substantial sources of light and glare. Overall, this development would increase skyglow and other nighttime illumination within the region into areas that currently experience little to no skyglow. The change in amount of light and glare associated with this development would be a significant cumulative impact. Implementation of the Project, in addition to other reasonably foreseeable projects in the region, would introduce new development into undeveloped agricultural and rural areas, increasing nighttime lighting and daytime glare and contributing to regional skyglow. Therefore, the Project's contribution to the change in character is cumulatively considerable. See DEIR page 5.1-13.

(b) Mitigation Measures. Municipal Code Chapter 23.56 addresses standards for lighting as part of new development. The City's Design Guidelines require that exterior building and site lighting be designed so that light is not directed off site and the light source is shielded downward from direct off-site viewing. General Plan Update Policy LU-5-4 require that nonglare glass be used in all nonresidential buildings to reduce impacts from glare. However, there is no additional feasible mitigation beyond compliance with the City's Design Guidelines, supplemental guidelines, and General Plan Update policies that would further lessen impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) Findings. Based on the EIR and the entire record before this City Council, this City Council finds that:

- (1) **No further mitigation.** All new development in the Planning Area would be required to comply with existing code requirements regulating lighting and glare and proposed General Plan Standard LU-5-4.a would further reduce the potential for glare. While implementation of existing codes and the proposed standard would likely reduce impacts of individual development projects to less than significant, the effect of light and glare from new development Citywide would substantially increase. No further feasible mitigation is available to reduce the Project's contribution to increased light and glare in the region.
- (2) **Remaining Impacts.** All new development in the Planning Area would be required to comply with existing code requirements regulating lighting and glare and General Plan standards would further reduce the potential for glare. While implementation of existing codes and the proposed standard would likely reduce impacts of individual development projects to less than significant, the effect of light and glare from new development Citywide would substantially increase. No further mitigation is available to reduce the Project's contribution to the regional change in visual character, and the cumulative impact would remain significant and unavoidable.
- (3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative impact of the Project resulting from increases in light and glare in the region, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

B. Agricultural Resources

1. Conversion of Agricultural Land/Loss of Important Farmland/Conflicts with Williamson Act Contracts (EIR Impact 5.2.1)

(a) **Potential Impact.** The Project would allow for development to occur on lands classified as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, which could result in the conversion and permanent loss of up to 5,633.4 acres of Important Farmlands. The conversion of this land would reduce the amount of Important Farmland in Sacramento County by approximately 3.8 percent. There are approximately 2,892 acres within the Planning Area subject to Williamson Act contracts, with approximately 272 acres located within the current City limits and the remaining 2,620 acres spread throughout the East, South, and West Study Areas. The Project would allow for development to occur in these areas, requiring nonrenewal or cancellation of the associated Williamson Act contracts. This urban development may impede the ability for the landowners to farm their land according to the Williamson Act contract and, therefore, be in violation of that contract. This is a potentially significant impact. See DEIR pages 5.2-18 and 5.2-19.

(b) **Mitigation Measures.** General Plan Update policies discourage the premature conversion of farmland and require mitigation of the loss of qualified agricultural lands at a 1:1 ratio. The City would be required to make findings pursuant to Section 51282 of the California Government Code by determining whether a Williamson Act Contract cancellation is consistent with the California Land

Conservation Act or in the public interest. However, there is no additional feasible mitigation beyond compliance with existing laws and procedures and General Plan Update policies that would further lessen impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the EIR and the entire record before this City Council, this City Council finds that:

- (1) **No further mitigation.** No additional feasible mitigation available beyond compliance with existing laws and procedures and proposed General Plan policies.
- (2) **Remaining Impacts.** General Plan Update policies and compliance with Williamson Act Contract cancellation statutory requirements would not prevent conversion of Important Farmland and per Policy AG-1-5 would not provide CEQA-compliant mitigation and would still result in the overall loss of farmland from current levels. This impact would remain significant and unavoidable.
- (3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from conversion of agricultural land, loss of Important Farmland, and/or conflicts with Williamson Act Contracts, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

2. Cumulative Agriculture Resources (EIR Impact 5.2.3)

(a) **Potential Impact.** Cumulative development in the County would continue the trend of conversion of agricultural land to nonagricultural use, despite required mitigation for the loss of farmland and future development in the Planning Area associated with Project buildout would contribute to the ongoing conversion of farmland in Sacramento County to urban uses by converting up to 5,633 acres of Important Farmland to nonagricultural uses. The Project, in combination with the adopted land use plans of Sacramento County and other neighboring jurisdictions, would result in the conversion of Important Farmland, including land under Williamson Act contract, to urban uses. The loss of such farmland resulting from implementation of the Project would contribute to a significant cumulative impact and would be cumulatively considerable. See DEIR pages 5.2-20 and 5.2-21.

(b) **Mitigation Measures.** General Plan Update Policy AG-1-5, which requires mitigation for the loss of qualified agricultural lands at a 1:1 ratio, would ensure the protection of an amount of agricultural land equal to that converted. However, because the mitigation only requires protection of farmland and as a way to limit future development and does not prevent the direct loss of farmland as a result of a specific development project nor does it create new farmland, General Plan Update policies would not prevent such conversion from occurring. There is no additional feasible mitigation beyond compliance with existing laws and procedures and General Plan Update policies that would further lessen impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the EIR and the entire record before this City Council, this City Council finds that:

- (1) **No further mitigation.** No additional feasible mitigation available beyond compliance with proposed General Plan policies and applicable Municipal Code sections.
- (2) **Remaining Impacts.** General Plan Update policies require mitigation for loss of qualified agricultural lands at a 1:1 ratio, but it would not prevent such conversion from occurring. The Project would still contribute to the loss of Important Farmland in the County. Therefore, the cumulative impact would remain significant and unavoidable.
- (3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative impact of the Project resulting from conversion of agricultural land, loss of Important Farmland, and/or conflicts with Williamson Act Contracts, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

C. Air Quality

1. Construction-Related Criteria Air Pollutant Emissions (EIR Impact 5.3.1)

(a) **Potential Impact.** Construction-related activities would result in Project-generated emissions of ROG, NOX, PM2.5, and PM10. Predicted maximum average daily construction-generated emissions for the Project would exceed the Sacramento Metropolitan Air Quality Management District (SMAQMD) significance criteria of 85 pounds for NOX and 80 pounds per day for PM10. This is a potentially significant impact. See DEIR pages 5.3-17 through 5.3-19.

(b) **Mitigation Measures.** General Plan Update policies and standards require implementation of SMAQMD-recommended standard construction mitigation. All projects that will involve construction activities, regardless of the significance determination, are required to implement the SMAQMD Basic Construction Emission Control Practices (Basic Practices) for controlling fugitive dust at construction sites. For projects where emissions still exceed the SMAQMD daily emissions threshold for NOX and PM after application of the above measures, the SMAQMD requires the project applicant to pay into the SMAQMD's construction mitigation fund to offset construction-generated emissions of NOX and/or PM. However, there is no additional feasible mitigation beyond compliance with existing regulations and General Plan Update policies that would further lessen impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

- (1) **No further mitigation.** No additional feasible mitigation available beyond compliance with existing regulations and proposed General Plan policies.
- (2) **Remaining Impacts.** All feasible construction emission reduction measures have been incorporated into the Project. However, these measures may

not be sufficient to fully reduce construction emissions below the applicable SMAQMD thresholds, especially since a component includes payment of a mitigation fee. Because multiple projects could be constructed simultaneously, which would collectively generate emissions, and project-specific details are unknown for individual projects at this time, it cannot be known with certainty that implementation of policies and standards and SMAQMD measure would reduce aggregated emissions to below the applicable SMAQMD thresholds. There is no additional feasible mitigation to reduce impacts to less than significant. Therefore, impacts associated with short-term construction emissions under the Project would remain significant and unavoidable.

(3) Overriding Considerations. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from construction-related air emissions, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

2. Long-Term Criteria Air Pollutant Emissions (EIR Impact 5.3.2)

(a) Potential Impact. Implementation of the Project would result in long-term increases in operational emissions of criteria air pollutants and ozone precursors (i.e., ROG and NOX). Project-generated increases in emissions would be predominantly associated with motor vehicle use. Implementation of General Plan Update Policy NR-4-1 could help reduce emissions of ROG, NOX, PM10, and PM2.5 to levels below the baseline conditions. However, there is inherent uncertainty as to size, intensity, and timing of future development that could occur over the Project's assumed buildout, and not all future development would be subject to the requirements of General Plan Update Policy NR-4-1: some smaller development projects could generate emissions at levels below the SMAQMD thresholds of significance and, thus, would not be subject to the 15 percent reduction requirement under General Plan Update Policy NR-4-1. In addition, because the thresholds are based on daily emissions, some larger projects could generate project-level emissions that exceed the SMAQMD thresholds, even with a 15 percent reduction after application of General Plan Update Policy NR-4-1. This is a potentially significant impact. See DEIR pages 5.3-19 through 5.3-21.

(b) Mitigation Measures. General Plan Update Policy NR-4-1 requires that all new development projects in the City with the potential to result in substantial air quality impacts incorporate features to reduce emissions equal to 15 percent compared to an "unmitigated baseline" project. Policy MOB-1-1 requires that new land use plans, amendments to such plans, and other discretionary development proposals demonstrate 15 percent reduction in VMT from existing conditions. Policy NR-4-3 promotes programs that would reduce mobile-source emissions of criteria air pollutants (i.e., VMT). Policies NR-4-4, NR-4-5, NR-4-6 would reduce single-occupant vehicle use through emphasis on demand management strategies and development of attractive alternative public transit options, which would serve to improve ambient air quality in the Planning Area to meet and/or maintain the national or state ambient air quality standards. However, there is no additional feasible mitigation that would further lessen long-term criteria air pollutant emissions impacts or

reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **No further mitigation.** No additional feasible mitigation available beyond compliance with proposed General Plan policies.

(2) **Remaining Impacts.** General Plan Update policies would reduce emissions of criteria air pollutants in the Planning Area, but it cannot be assumed to be sufficient to reduce operational emissions to meet the SMAQMD thresholds. All feasible operational emissions reduction measures have been incorporated into the Project through the inclusion of the General Plan Update policies. There are no additional plan-level measures available that would reduce impacts from long-term operational-related emissions. There could be additional project-specific mitigation measures to reduce long-term operational-generated emissions of air pollutants to levels below the SMAQMD's thresholds of significance. However, the nature, feasibility, and effectiveness of such project-specific mitigation cannot be determined at this time. As such, the City cannot assume that mitigation would be available and implemented such that all future operational-related emissions of air pollutants would be reduced to less than significant levels. Therefore, this impact would remain significant and unavoidable.

(3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from long-term criteria air pollutant and ozone precursor emissions, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

3. Toxic Air Contaminant Emissions (EIR Impact 5.3.4)

(a) **Potential Impact.** Construction of future projects in the Planning Area could result in short-term emissions of toxic air contaminants (TAC). Diesel-powered construction equipment is a primary potential source of TAC and associated with the release of diesel particulate matter (PM). Long-term emissions of TAC would be primarily associated with mobile emissions and, to a lesser extent, from new stationary sources. New TAC stationary sources could be developed but would be subject to specific siting requirements. Locating sensitive land uses such as residences, schools, or parks near SR 99 and I-5, which accommodate more than 100,000 daily vehicle trips, could result in negative health effects. With the addition of the Project, 2035 traffic volumes on the roadway segments would increase substantially such that volumes would contribute additional trips to these roadways. This is a potentially significant impact. See DEIR pages 5.3-24 through 5.3-28.

(b) **Mitigation Measures.** General Plan Update Policy NR-4-8 requires that development projects incorporate the applicable SMAQMD construction mitigation measures, which would help reduce construction diesel PM emissions. Under General Plan Update Policy NR-4-9, future sensitive land uses proposed within 500 feet of SR 99 and I-5 would be compared to the

SMAQMD screening table to assess whether TAC exposure would exceed the evaluation. In cases where the evaluation criterion is exceeded, project applicants would be required to conduct site-specific air dispersion modeling and a health risk assessment. Policies 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 serve to lower exposure of sensitive receptors to sources of TAC throughout the Planning Area. If a new stationary source of TAC is proposed to be sited in or near the Planning Area, it would be subject to the rules under the SMAQMD Regulation 2, Permits, and emissions controls would be implemented if required. Construction and stationary source TAC would be reduced through adherence to existing regulations. However, there is no additional feasible mitigation beyond compliance with existing regulations and General Plan Update policies that would further lessen impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **No further mitigation.** No additional feasible mitigation available beyond compliance with existing regulations and proposed General Plan policies

(2) **Remaining Impacts.** Increased traffic on roadways resulting from the Project could exacerbate existing concentrations of TAC, resulting in a health risk for existing or new sensitive receptors. Implementation of General Plan Policies would serve to lower exposure of sensitive receptors to sources of TAC throughout the Planning Area. All feasible mobile source TAC health risk reduction measures have been incorporated into the Project through the inclusion of the General Plan Update policies. There could be additional project-specific mitigation measures to reduce the health risks of mobile-source TAC to levels below the SMAQMD's thresholds of significance. However, the nature, feasibility, and effectiveness of such project-specific mitigation cannot be determined at this time. As such, the City cannot assume that mitigation would be available and implemented such that all future health risk increases from exposure to TAC would be reduced to less than significant levels. No additional feasible mitigation is available. Therefore, this impact would remain significant and unavoidable.

(3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from mobile-source TAC emissions, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

4. Odorous Emissions (EIR Impact 5.3.5)

(a) **Potential Impact.** A major source of odor within the Planning Area originates from agricultural activity, primarily related to dairy farm operations. The Sacramento Regional Sanitation District (Regional San) wastewater treatment plant (WWTP) is located 1 mile north of northern boundary of the Planning Area and is an odor source. The Project could result in the development of industrial land uses that could be a source of odors. However, the actual uses

that would be developed are not known at this time, as no specific development projects are currently proposed or have been identified. As such, the degree of impact with respect to potential odors associated with future projects and their effects on adjacent receptors is uncertain. Implementation of the Project could result in increased exposure of sensitive receptors to odorous emissions as compared to baseline conditions. The potential exposure of sensitive receptors to odors would be considered potentially significant. See DEIR pages 5.3-28 through 5.3-30.

(b) Mitigation Measures. Agricultural activities are protected pursuant to Chapter 14.05 of the Municipal Code, provided farming activities are properly conducted in accordance with City standards. General Plan Update Policy AG-1-6 limits the siting of projects with sensitive land uses within existing agricultural sites to mitigate odor impacts. Policy AG-1-3 allows for buffers or feathering of lot sizes between farmland and urban uses and property title disclosures, pursuant to Municipal Code Chapter 14.05, to reduce potential impacts. There are no additional feasible mitigation measures to mitigate this impact. General Plan Update Policy NR-4-13 and associated standards would prohibit siting of new sources of odors or siting of new sensitive land uses near existing sources of odor if the SMAQMD CEQA Guide minimum screening distance is not met, or evidence is provided that a significant number of people would not be exposed to substantial odors. However, there is no additional feasible mitigation beyond compliance with existing regulations and General Plan Update policies that would further lessen impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) Findings. Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) No further mitigation. No additional feasible mitigation available beyond compliance with existing regulations and proposed General Plan policies

(2) Remaining Impacts. General Plan Update policies would help reduce the possibility of odor exposure in the Planning Area, but it cannot be assumed to be sufficient to reduce odors to less than significant levels. There are no additional plan-level measures available that would reduce impacts from short-term and long-term odors. All feasible odor reduction measures have been incorporated into the Project through the inclusion of the General Plan Update policies discussed above. There could be additional project-specific mitigation measures to reduce odors to less than significant levels. However, the nature, feasibility, and effectiveness of such project-specific mitigation cannot be determined at this time. As such, the City cannot assume that mitigation would be available and implemented such that all future odors would be reduced to less than significant levels. No additional feasible mitigation is available. Therefore, this impact would remain significant and unavoidable.

(3) Overriding Considerations. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from odorous emissions, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

5. **Consistency with Air Quality Attainment Plan (EIR Impact 5.3.6)**

(a) **Potential Impact.** Implementation of the Project would result in potentially significant and unavoidable impacts related to short-term construction and long-term criteria air pollutant and ozone precursor emissions after the application of all feasible mitigation (see subsections C.1 and C.2, above). Therefore, the Project would not be considered fully consistent with the primary goal of the Sacramento Regional NAAQS 8-Hour Ozone Attainment and Further Progress Plan (Attainment Plan). This is a potentially significant impact. See DEIR pages 5.3-30 through 5.3-31.

(b) **Mitigation Measures.** As explained in subsections III.C.1 and III.C.2, above, there are no additional feasible mitigation measures that would further lessen the criteria air pollutant and ozone precursor impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **No further mitigation.** No additional feasible mitigation available beyond compliance with existing regulations and proposed General Plan policies.

(2) **Remaining Impacts.** All feasible operational emission reduction measures have been incorporated into the Project through the inclusion of the General Plan Update policies. There are no additional plan-level measures available that would reduce impacts from short-term construction or long-term operational-related emissions to ensure consistency with the Attainment Plan. There could be additional project-specific mitigation measures to reduce emissions of air pollutants to levels below the SMAQMD's thresholds of significance. However, the nature, feasibility and effectiveness of such project-specific mitigation cannot be determined at this time. As such, the City cannot assume that mitigation would be available and implemented such that all future emissions of air pollutants would be reduced to less than significant levels. No additional feasible mitigation is available. Therefore, this impact would remain significant and unavoidable.

(3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from inconsistency with the Attainment Plan, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

5. **Cumulative Air Quality Impacts (EIR Impact 5.3.7)**

(a) **Potential Impact.** The Sacramento region is nonattainment for ozone and PM. Implementation of the Project would result in long-term increases in operational emissions of criteria air pollutants and ozone precursors (i.e., ROG and NOX), which would be predominantly associated with motor vehicle use. Project would result in an increase in VMT not accounted for in regional air quality control plans. The Project proposes changes in land uses as compared to baseline conditions and predicted long-term operational emissions attributable to the Project would exceed the SMAQMD significance

thresholds. As such, development constructed and operated under the Project could result in a cumulatively considerable contribution to regional problems with criteria air pollutants and ozone precursors. See DEIR pages 5.3-31 and 5.3-32.

(b) Mitigation Measures. General Plan Update Policy NR-4-1 requires that all new development projects in the City with the potential to result in substantial air quality impacts incorporate features to reduce emissions equal to 15 percent compared to an “unmitigated baseline” project. General Plan Policies MOB-1-1 and MOB-1-2 target reductions in VMT within the Planning Area. Policy NR-4-3 promotes programs that would reduce mobile-source emissions of criteria air pollutants (i.e., VMT). Policies NR-4-4, NR-4-5, NR-4-6 would reduce single-occupant vehicle use through emphasis on demand management strategies and development of attractive alternative public transit options, which would serve to improve ambient air quality in the Planning Area to meet and/or maintain the national or state ambient air quality standards. However, there is no additional feasible mitigation beyond compliance with General Plan Update policies that would further lessen impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) Findings. Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) No further mitigation. No additional feasible mitigation available beyond compliance with proposed General Plan policies.

(2) Remaining Impacts. General Plan Update policies would reduce emissions of criteria air pollutants in the Planning Area, but it cannot be assumed to be sufficient to reduce operational emissions to meet the SMAQMD thresholds. All feasible operational emissions reduction measures have been incorporated into the Project through the inclusion of the General Plan Update policies. There are no additional plan-level measures available that would reduce impacts from long-term operational-related emissions. No additional feasible mitigation is available. Therefore, this impact would remain significant and unavoidable.

(3) Overriding Considerations. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative impact of the Project resulting from criteria air pollutant and ozone precursor emissions, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

D. Biological Resources

1. Endangered, Threatened, Candidate or Rare Species (EIR Impact 5.4.1)

(a) Potential Impact. The Planning Area contains suitable habitat for plant and wildlife species listed as endangered, threatened, rare, or proposed, or candidates for listing (listed species). Implementation of the Project could result in adverse effects, either directly or indirectly, on species listed as endangered, threatened, rare, proposed, and candidate plants and wildlife. Most direct impacts would occur from development of nonnative annual grassland, vernal

pools, wetlands, and other waters of the U.S. (WoUS), waters of the State, riparian communities, and oak woodlands in the Study Areas because the land cover is largely undeveloped and provides large, contiguous areas of habitat for special-status species. Redevelopment of parcels and associated structures in the Planning Area could also result in disturbance and habitat loss for special-status bat and bird species. Indirect impacts may also occur, such as habitat modification, increased human/wildlife interactions, habitat fragmentation, encroachment by exotic weeds, and area-wide changes in surface water flows and general hydrology due to development of previously undeveloped areas. This impact would be potentially significant. See DEIR pages 5.4-53 through 5.4-57.

(b) Mitigation Measures. Future development in the Planning Area would be subject to regulations protecting biological resources at the federal, State, regional, and local levels. Pursuant to the requirements of the California Endangered Species Act and applicable California Fish and Game Code regulations, individual projects would be required to obtain necessary permits, which would include consultation with appropriate agencies and implementation of mitigation measures to address direct and indirect impacts on listed species and associated habitat. The City's Tree Preservation and Protection Code (Municipal Code Chapter 19.12) and Swainson's Hawk Code (Municipal Code Chapter 16.130) provide further protection of special-status species and habitat. The General Plan includes numerous goals, policies, and standards that would further minimize direct and indirect impacts on special-status species. However, there is no additional feasible mitigation beyond compliance with existing regulations and General Plan Update policies and standards that would further lessen these impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) Findings. Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) No further mitigation. No additional feasible mitigation available beyond compliance with existing regulations and proposed General Plan policies and standards.

(2) Remaining Impacts. Future development, particularly in the Study Areas, which are largely undeveloped, could result in direct and indirect impacts on species or habitat. Though application of existing regulations and General Plan Update policies and standards would reduce impacts on listed species, individual species populations would experience habitat losses where creation and enhancement of habitat is not feasible, thereby causing an overall reduction in available habitat. No additional feasible mitigation is available. Therefore, this impact would remain significant and unavoidable.

(3) Overriding Considerations. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project related listed species, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

2. Non-Listed Special-Status Species (EIR Impact 5.4.2)

(a) **Potential Impact.** The Planning Area contains suitable habitat for many non-listed special-status plant and wildlife species (Species of Special Concern, fully protected, and locally important). As with listed species, implementation of the Project could result in adverse effects, either directly or indirectly, on non-listed special-status species, particularly in the Study Areas where there are large, contiguous areas for habitat. Redevelopment of parcels within the Planning Area that contain structures could result in disturbance and habitat loss for special-status bat and bird species. This impact would be potentially significant. See DEIR pages 5.4-57 and 5.4-58.

(b) **Mitigation Measures.** Future development in the Planning Area would be subject to regulations protecting biological resources at the federal, State, regional, and local levels. Pursuant to the requirements of the California Endangered Species Act and applicable California Fish and Game Code regulations. Individual projects would be required to obtain necessary permits, which would include consultation with appropriate agencies and implementation of mitigation measures to address direct and indirect impacts on listed species and associated habitat. The City's Tree Preservation and Protection Code (Municipal Code Chapter 19.12) and Swainson's Hawk Code (Municipal Code Chapter 16.130) provide further protection of special-status species and habitat. The General Plan includes numerous goals, policies, and standards that would further minimize direct and indirect impacts on special-status species. However, there is no additional feasible mitigation beyond compliance with existing regulations and General Plan Update policies and standards that would further lessen these impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **No further mitigation.** No additional feasible mitigation available beyond compliance with existing regulations and proposed General Plan policies and standards.

(2) **Remaining Impacts.** Future development, particularly in the Study Areas, which are largely undeveloped, could result in direct and indirect impacts on non-listed species or habitat. Though application of existing regulations and General Plan Update policies and standards would reduce impacts, individual species populations would experience habitat losses where creation and enhancement of habitat is not feasible, thereby causing an overall reduction in available habitat. No additional feasible mitigation is available. Therefore, this impact would remain significant and unavoidable.

(3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from potential loss of non-listed species, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

3. Cumulative Biological Resources Impacts (EIR Impact 5.4.7)

(a) Potential Impact. The habitat within the region is highly developed with large areas of natural or agricultural lands. Developed areas have encroached into some natural habitat, particularly annual grasslands and aquatic features. The natural communities and some agricultural communities provide suitable habitat for special-status species. Because there has already been a large decline in available habitat for special-status species, there has been a significant cumulative impact on biological resources and the habitat that at present is particularly important. As development occurs in the Planning Area and vicinity, habitat for biological resources will continue to be converted to urban development. More mobile species may survive this development by moving to other areas, but less mobile species would not. Natural habitat conversion would reduce the availability of habitat for special-status species. The natural areas remaining would likely be isolated and not support biological resources beyond their current carrying capacity. The Project would result in the increase of urban buildout and contribute to the loss of habitat for special-status species, as well as common species. The Project's contribution to the cumulative loss of habitat would be cumulatively considerable. See DEIR pages 5.4-61 and 5.4-62.

(b) Mitigation Measures. Future development in the Planning Area would be subject to regulations protecting biological resources at the federal, State, regional, and local levels. Pursuant to the requirements of the California Endangered Species Act and applicable California Fish and Game Code regulations, individual projects would be required to obtain necessary permits, which would include consultation with appropriate agencies and implementation of mitigation measures to address direct and indirect impacts on listed species and associated habitat. The City's Tree Preservation and Protection Code (Municipal Code Chapter 19.12) and Swainson's Hawk Code (Municipal Code Chapter 16.130) provide further protection of special-status species and habitat. The General Plan includes numerous goals, policies, and standards that would further minimize direct and indirect impacts on special-status species. However, there is no additional feasible mitigation beyond compliance with existing regulations and General Plan Update policies and standards that would further lessen the Project's contribution to cumulative impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) Findings. Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) No further mitigation. No additional feasible mitigation available beyond compliance with existing regulations and proposed General Plan policies and standards.

(2) Remaining Impacts. Implementation of existing regulations and General Plan Update policies and standards would reduce the direct impacts of individual development projects on special-status plants and wildlife, native trees, and jurisdictional wetlands and/or waters to a less than significant level. However, aggregated impacts to listed species of all projects under the General Plan would remain significant and unavoidable. On a cumulative level, the Project's contribution to direct and indirect impacts would remain

cumulatively considerable. No additional feasible mitigation is available. Therefore, this impact would remain significant and unavoidable.

(3) Overriding Considerations. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative biological resources impacts of the Project, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

E. Greenhouse Gas Emissions

1. Potential to Conflict with Long-term Statewide GHG Emissions Reduction Goal for 2050 (Project-Level and Cumulative EIR Impact 5.7.2)

(a) Potential Impact. Adoption of the General Plan Update and CAP Update would result in emission reductions that are consistent with statewide reduction targets for 2020 and 2030. However, based on current emission estimates for the City projected for 2050, and considering the policies and programs included in the General Plan Update and CAP Update, the General Plan and CAP updates would likely not result in sufficient GHG reductions for the City to meet the longer-term goal for 2050 as stated in Executive Order (EO) S-3-05. This impact would be potentially significant. See DEIR pages 5.7-36 and 5.7-38.

(b) Mitigation Measures. General Plan Update Policy NR-5-1 requires the City to achieve GHG emissions reductions that are consistent with State targets. Additionally, as stated in the General Plan Update implementation programs under "CAP and GHG emissions inventory updates," the City would conduct an update of the community-wide GHG emissions inventory every five years to assess progress to date in meeting the adopted targets, and periodically update the CAP in response to post-2030 emissions reduction targets and associated updates to the Scoping Plan that could be approved by the State, in light of State's long-term 2050 emission reduction goal established by EO S-3-05 and guidance stated in the 2017 Scoping Plan. Additional technological advances across multiple sectors would be required to reduce emissions further, combined with additional regulatory actions at the State or federal levels that are currently unknown beyond the year 2030. The 2017 Scoping Plan only identifies known commitments and proposed actions that will be taken by the State to achieve the 2030 target. Furthermore, the State has not yet proposed a detailed update to the Scoping Plan for future targets that may be adopted beyond 2030 on the path to meeting the 2050 goal. There is no additional feasible mitigation beyond compliance with the CAP Update and General Plan Update policies that would further lessen these impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) Findings. Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) No further mitigation. No additional feasible mitigation available beyond compliance with the CAP Update and proposed General Plan policies.

(2) Remaining Impacts. Even with General Plan Update policies, implementation programs, and CAP Update GHG reduction measures

that would be implemented under the Project, per capita emissions would not meet the long-term adjusted statewide emissions reduction goal of 1.4 MTCO₂e per capita by 2050, consistent with EO S-3-05 and the 2017 Scoping Plan. No additional mitigation or information regarding future available technology advancements or future State plans for achieving post-2030 emission reductions is available at this time that can be further quantified. Therefore, this impact would remain significant and unavoidable.

- (3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from post-2030 GHG emissions, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

F. Hydrology and Water Quality

1. Groundwater Supplies (EIR Impact 5.9.4)

(a) **Potential Impact.** Implementation of the Project would increase demand for domestic water supply, which may result in the need for additional water supplies. Almost all of the new demand under the Project would be the result of development in the Study Areas. It is possible that Study Area demand may need to be met with increased groundwater pumping in shortfall years. Climate change may also affect the reliability of groundwater supplies. The demand would not occur all at once but would be expected to increase over time. Existing programs are in place to protect groundwater resources in the Central Basin to ensure the sustainable yield set forth in the Water Forum Agreement, but the Project may contribute to conditions that could affect aquifer volume or groundwater levels, and the City has no authority over management of groundwater resources. The development of future groundwater supplies could result in environmental impacts, some of which may be significant. Examples of such impacts could include effects on biological resources, changes in surface water flows, or changes in groundwater levels. This is a potentially significant impact. See DEIR pages 5.9-36 through 5.9-38.

(b) **Mitigation Measures.** Mitigation Measure MM 5.12.1.1 (Plan for Services) is hereby adopted and will be implemented as provided by the Mitigation Monitoring and Reporting Program.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **Effects of Mitigation.** Mitigation measure MM 5.12.1.1 requires demonstration of adequate water supply prior to annexation through preparation of a Plan for Services prepared by the City and submitted to Sacramento LAFCo for approval. Condition (2) specifically requires that the Plan for Services demonstrate the water purveyor is a signatory to the Water Forum Agreement and that groundwater will be provided in a manner that ensures no overdraft will occur (i.e., the sustainable yield for the Central Basin will not be exceeded). LAFCo would condition future annexations on compliance with mitigation measure MM 5.12.1.1.

(2) Remaining Impacts. Documenting sufficient water supply, which would include groundwater, pursuant to mitigation measure MM 5.12.1.1 would conform to General Plan Update Policy INF-1-1 requirements. However, the evaluation and analysis needed to demonstrate sufficient supply, along with necessary environmental review and implementation of mitigation measures to ensure groundwater resources would not be adversely affected, would be the responsibility of the water purveyor, not the City. Such an evaluation by the City would be remote and speculative, considering the programmatic nature of the EIR. There is no additional feasible mitigation to reduce this impact to less than significant, and this would remain a significant and unavoidable impact.

(3) Overriding Considerations. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from potential increased demand on groundwater supply, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

2. Cumulative Groundwater Impacts (EIR Impact 5.9.7)

(a) Potential Impact. The cumulative setting for groundwater impacts is the area that pumps groundwater from the Central Basin portion of the South American Subbasin, which includes the Cities of Elk Grove, Sacramento, and Folsom as well as areas of unincorporated Sacramento County. As cumulative development occurs in the region, the demand for groundwater resources may increase, resulting in greater withdrawals from the Central Basin portion of the South American subbasin. Continued implementation of the Water Forum Agreement and the Groundwater Management Plan, which would be the responsibility of Sacramento County Water Agency (SCWA), would protect the Central Basin from overdraft by limiting withdrawals to below the established sustainable yield. The Project could increase demand for water resources, a portion or all of which would be met with groundwater. Because the West and South Study Areas have not been included in the projected demand relative to supply, and additional groundwater production may be needed to meet Project demand, the Project's contribution to this impact would be potentially cumulatively considerable. See DEIR pages 5.9-41 and 5.9-42.

(b) Mitigation Measures. Mitigation Measure MM 5.12.1.1 (Plan for Services) is hereby adopted and will be implemented as provided by the Mitigation Monitoring and Reporting Program.

(c) Findings. Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) Effects of Mitigation. Mitigation measure MM 5.12.1.1 requires demonstration of adequate water supply prior to annexation through preparation of a Plan for Services prepared by the City and submitted to Sacramento LAFCo for approval. Condition (2) specifically requires that the Plan for Services demonstrate the water purveyor is a signatory to the Water Forum Agreement and that groundwater will be provided in a manner that ensures no overdraft will occur (i.e., the sustainable yield for

the Central Basin will not be exceeded). LAFCo would condition future annexations on compliance with mitigation measure MM 5.12.1.1.

- (2) **Remaining Impacts.** Mitigation measure MM 5.12.1.1 is intended to ensure that sufficient water supplies are available to meet the demand of new development in the Planning Area, in addition to existing and planned development under normal, single dry, and multiple dry years. However, the determination of whether additional groundwater production is needed and how it would be managed to ensure compliance with the Water Forum Agreement is not within the purview of the City to implement. Therefore, the Project's contribution to the impact would be cumulatively considerable. There is no additional feasible mitigation, and the cumulative impact would remain significant and unavoidable.
- (3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative impact of the Project resulting from long-term increased use of groundwater supplies, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

G. Noise

1. Long-Term Traffic Noise (EIR Impact 5.10.2)

- (a) **Potential Impact.** The Project includes new land use modifications and designations that would result in increased traffic volumes on major arterial and collector roadways in the City as well as increased volumes on I-5 and SR 99. The Project also includes new proposed roadways and would increase traffic volumes on new and existing City roadways. These increased traffic volumes could expose existing and future sensitive receptors and noise-sensitive land uses to increased traffic noise that exceed the City's noise standards. This is a potentially significant impact. See DEIR pages 5.10-35 through 5.10-42.
- (b) **Mitigation Measures.** General Plan Update policies N-1-1, N-1-2, N-1-4, N-1-5, and N-2-3 are intended to limit noise impacts on existing and future development in the City. These policies are intended to ensure that new proposed development projects would comply with noise standards and would not adversely impact sensitive land uses from traffic noise. However, there is no additional feasible mitigation beyond compliance with General Plan Update policies that would further lessen these impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.
- (c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:
 - (1) **No further mitigation.** No additional feasible mitigation measures available beyond compliance with proposed General Plan policies.
 - (2) **Remaining Impacts.** General Plan Update policies would serve to limit traffic noise exposure to sensitive receptors, but these policies cannot ensure that noise levels would be reduced to levels within the City's noise standards at all sensitive receptors. With increases for existing roadways

ranging from 3 dB or more and up to 20 dB along some roadway segments, the ability to reduce impacts along roadways with measures such as sound walls or berms may not be feasible. There is no additional feasible mitigation available. Therefore, this impact would remain significant and unavoidable.

- (3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from traffic noise, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

2. Cumulative Traffic Noise Impacts (EIR Impact 5.10.5)

(a) **Potential Impact.** Predicted future cumulative transportation noise levels are projected to exceed the City's noise standards. While traffic volumes would likely increase irrespective of Project implementation, the Project would introduce future development that would contribute to cumulative traffic volumes. Modeling results for traffic volumes resulting from the Project show that there would be a cumulative contribution to traffic noise levels along major roadways in the Planning Area. With the addition of the Project, traffic noise levels along roadways in the Planning Area would exceed the City's applicable noise standards for traffic noise as well as contribute to substantial increases in traffic noise levels along roadways that already currently exceed the City's noise level standards. The Project's contribution would be cumulatively considerable. See DEIR pages 5.10-46 and 5.10-47.

(b) **Mitigation Measures.** General Plan Update policies N-1-1, N-1-2, N-1-4, N-1-5, and N-2-3 address and limit noise impacts on existing and future development in the City. These policies are intended to ensure that new specific proposed development would comply with noise standards and would not adversely impact sensitive land uses from traffic noise. However, there is no additional feasible mitigation beyond compliance with General Plan Update policies that would further lessen these impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

- (1) **No further mitigation.** No additional feasible mitigation available beyond compliance with proposed General Plan policies.

- (2) **Remaining Impacts.** General Plan Update policies would serve to limit traffic noise exposure to sensitive receptors, but because information on all future development activity is not currently available, traffic noise mitigation measures may not be considered feasible for all noise-sensitive land uses that may be impacted. This may result in noise-sensitive land uses that are still exposed to traffic noise levels above applicable City standards. There is no additional feasible mitigation available. Therefore, the cumulative impact would remain significant and unavoidable.

- (3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative impact of the Project resulting from traffic noise, as more fully

stated in the Statement of Overriding Considerations in Section VIII of this document.

H. Public Services

1. Public School Facilities (EIR Impact 5.11.3.1)

(a) **Potential Impact.** Anticipated development under the Project would result in a substantial number of school-aged children in the Planning Area, triggering the need for new or expanded public school facilities. Where new growth in the existing City limits would occur, such as in approved specific plan areas, new school sites have been assumed as part of the planning process to accommodate the anticipated growth. Prior to development of the Study Areas, community plans would be prepared that would identify sites and funding sources for future schools as determined necessary to meet anticipated demand. Construction or expansion of public school facilities to accommodate population growth could result in significant impacts on such resources as aesthetics, air quality, biology, cultural resources, geology, hazards and hazardous materials, water quality, noise, and transportation. Because the location of any such school facility has not been determined, it is speculative to address any precise environmental impacts associated with them. The actual impacts of new school facilities would depend upon the specific type and location of those facilities and, therefore, project-specific environmental review would be required. Because the entire Planning Area is assumed for development, however, the physical impacts of facility construction would not exceed the impacts assumed as part of development of the Planning Area and analyzed throughout the EIR. Nonetheless, because school facilities would be constructed by the Elk Grove Unified School District (EGUSD), which is not subject to local regulations or any General Plan Update policies or mitigation, this impact would be potentially significant. See DEIR pages 5.11-11 through 5.11-13.

(b) **Mitigation Measures.** General Plan Update Policy CIF-4-2 requires specific plans and other land use master plans to identify future school sites and propose guidance for incorporating new schools into overall neighborhood design. All residential development within the Planning Area would be subject to the EGUSD residential fee in place at the time an application is submitted for a building permit. Under California Government Code Section 65995(h), payment of EGUSD residential development fees is considered mitigation for school facilities generated by Project implementation. However, the environmental impacts of construction the facilities are unknown at this time, and mitigation measures that would reduce potential impacts to less than significant are also unknown. There is no additional feasible mitigation available beyond compliance with existing laws and General Plan Update policies to further lessen these impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **No further mitigation.** No additional feasible mitigation available beyond compliance with existing laws and proposed General Plan policies.

(2) Remaining Impacts. The Project would increase enrollment in the EGUSD, which could exceed school capacities. Exceeding school capacity would not be considered a physical impact under CEQA, and payment of fees is considered mitigation. Although the physical impacts of facility construction would not exceed the impacts assumed as part of development of the Planning Area and analyzed throughout the EIR, the EGUSD is not subject to General Plan Update policies or mitigation adopted by the City to reduce environmental effects of school construction. No enforceable measures are available. Therefore, this impact would remain significant and unavoidable.

(3) Overriding Considerations. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from increased need for public school facilities, the construction of which could result in environmental impacts, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

2. Cumulative Public School Facilities Impacts (EIR Impact 5.11.3.2)

(a) Potential Impact. The EGUSD boundaries encompass not only the Planning Area, but portions of the cities of Sacramento and Rancho Cordova, and most of southern Sacramento County. The EGUSD (2017) determined in the facility needs analysis that it is currently lacking capacity for K-12 and Special Day Class Severe students. Implementation of the Project, in combination with the existing shortage in class space and other planned and approved projects in the EGUSD service area, would increase the student population in the district, requiring the expansion of existing facilities or construction of new facilities, which could result in environmental impacts. Construction of these facilities would be similar to that identified throughout the EIR for development within the Planning Area. While the General Plan includes policies to ensure development in the Planning Area would be reduced to the extent feasible, these policies would not apply to the EGUSD. Therefore, the Project's contribution to this impact would be cumulatively considerable. See DEIR page 5.11-14.

(b) Mitigation Measures. Under California Government Code Section 65995(h), payment of EGUSD residential development fees is considered mitigation for school facilities generated by Project implementation. However, the environmental impacts of construction the facilities are unknown at this time, and mitigation measures that would reduce potential impacts to less than significant are also unknown and would not apply to the EGUSD. Therefore, mitigation is considered infeasible, as explained in subsection III.H.1.b, above.

(c) Findings. Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) No further mitigation. No additional feasible mitigation available beyond compliance with existing laws and proposed General Plan policies.

(2) Remaining Impacts. The Project would contribute to increased enrollment in the EGUSD. Although the physical impacts of facility construction would not exceed the impacts assumed as part of development of the Planning

Area and analyzed throughout the DEIR, the EGUSD is not subject to General Plan Update policies or mitigation adopted by the City to reduce environmental effects of school construction. No enforceable measures are available. Therefore, the cumulative impact would remain significant and unavoidable.

- (3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative impact of the Project resulting from increased need for public school facilities, the construction of which could result in environmental impacts, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

I. Public Utilities

1. Water Supplies (EIR Impact 5.12.1.1)

(a) **Potential Impact.** Implementation of the Project would increase demand for domestic water supply, which may result in the need for additional water supplies. The demand would not occur all at once but would be expected to increase over time. Almost all of the new demand under the Project would be the result of development in the Study Areas. Under a normal year and first-year multiple-dry scenario, the SCWA projects a surplus over its 20-year Urban Water Management Plan (UWMP) planning horizon, and the additional demand generated by the Project specific to the Study Areas would not exceed the surplus. However, in 2025 and beyond for the first and third year multiple-dry year scenarios, there may not be sufficient surplus water with SCWA's existing supplies and entitlements to meet Project demands. In addition, the West and South Study Areas are not in the SCWA's current service area. As noted above, climate change may also have an effect on water supplies. It is possible that Study Area demand may need to be met with increased groundwater pumping in shortfall years, or the SCWA (or other applicable water provider) could seek to increase surface water supplies. New or expanded entitlements may be needed to meet the water provider's projected demands for its service area in addition to the demand of the Project in buildout years. The City would not determine how the SCWA (or any other water purveyor such as the Elk Grove Water District or the Omochumne-Hartnell Water District) might manage its existing supplies and proceed with acquiring additional entitlements, if needed, to meet the buildout demand generated by the Study Areas. This is potentially significant impact. See DEIR pages 5.12-21 through 5.12-24.

(b) **Mitigation Measures.** Mitigation Measure MM 5.12.1.1 (Plan for Services) is hereby adopted and will be implemented as provided by the Mitigation Monitoring and Reporting Program. There are established laws, regulations, and mechanisms in place that provide for such planning. These include preparation of water supply assessments (WSAs) pursuant to California Water Code Section 10910, as applicable, and written verification of supply (California Government Code Section 66473.7).

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

- (1) Effects of Mitigation.** Mitigation measure MM 5.12.1.1 requires demonstration of adequate water supply prior to annexation through preparation of a Plan for Services prepared by the City and submitted to Sacramento LAFCo for approval. Condition (2) specifically requires that the Plan for Services demonstrate the water purveyor is a signatory to the Water Forum Agreement and that groundwater will be provided in a manner that ensures no overdraft will occur (i.e., the sustainable yield for the Central Basin will not be exceeded). LAFCo would condition future annexations on compliance with mitigation measure MM 5.12.1.1.
- (2) Remaining Impacts.** Documenting sufficient water supply pursuant to mitigation measure MM 5.12.1.1 would conform to General Plan Update Policy INF-1-1 requirements. However, the evaluation and analysis needed to demonstrate sufficient supply, along with necessary environmental review and implementation of mitigation measures to ensure groundwater resources would not be adversely affected, would be the responsibility of the water purveyor, not the City. Such an evaluation by the City would be remote and speculative, considering the programmatic nature of the EIR. There is no additional feasible mitigation to reduce this impact to less than significant, and this would remain a significant and unavoidable impact.
- (3) Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from increased demand on water supply, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

2. Construction of Water System Facilities (EIR Impact 5.12.1.2)

- (a) Potential Impact.** Water demand within the existing City limits and the East and North Study Areas were accounted for in the SCWA demand projections and therefore the SCWA 2016 Water Supply Infrastructure Plan (WSIP), but the West and South Study Areas were not. As a result, necessary infrastructure, such as water conveyance facilities, are also not reflected in the SCWA 2016 WSIP. New water transmission infrastructure would be required for the Study Areas. Some improvements may also be needed in the existing City limits. The SCWA may also determine that improvements are needed elsewhere within its service area to meet Planning Area demand at buildout. Potential impacts of construction of new or modified water system infrastructure could include disturbance of biological and/or cultural resources, conversion of agricultural land, construction-related air emissions, soil erosion and water quality degradation, handling of hazardous materials (e.g., fuels), temporary excessive noise, and temporary construction traffic. This is a potentially significant impact. See DEIR pages 5.12-24 and 5.12-25.
- (b) Mitigation Measures.** Mitigation Measure MM 5.12.1.1 (Plan for Services) is hereby adopted and will be implemented as provided by the Mitigation Monitoring and Reporting Program. In addition, General Plan Update Standard INF-1-1.a sets forth specific requirements for ensuring necessary infrastructure is in place to serve new development. General Plan Standard IFP-1-8.b directs that new development in expansion areas should be phased

where public services and infrastructure exist or may be extended with minimal impact. Policies IFP-1-7 and IFP-1-8 and Standard IFP-1-8a provide similar direction to ensure that adequate infrastructure is in place to serve future development.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **Effects of Mitigation.** Mitigation measure MM 5.12.1.1 requires demonstration of adequate water system facilities prior to annexation through preparation of a Plan for Services prepared by the City and submitted to Sacramento LAFCo for approval. LAFCo would condition future annexations on compliance with mitigation measure MM 5.12.1.1.

(2) **Remaining Impacts.** The construction of facilities to demonstrate compliance with mitigation measure MM 5.12.1.1 could result in environmental impacts. The evaluation and analysis needed to identify the required water system infrastructure improvements, environmental review, and implementation of mitigation measures would be the responsibility of the water purveyor, not the City. Such an evaluation by the City would be remote and speculative, considering the programmatic nature of the EIR. There is no additional feasible mitigation to reduce this impact to less than significant, and this would remain a significant and unavoidable impact.

(3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact of the Project resulting from water system infrastructure construction impacts, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

3. Cumulative Water Supply Impacts (EIR Impact 5.12.1.3)

(a) **Potential Impact.** The SCWA projects a water surplus for cumulative development for all scenarios out to 2040. Therefore, the cumulative demand for domestic water supply is considered a less than significant cumulative impact. The Project's projected total water demand at buildout, which predominantly includes demand associated with future development in the West and South Study Areas, was not considered in the SCWA's 2015 UWMP, and the infrastructure to deliver water to and within the West and South Study Areas is not a component of the Zone 40 WSMP or WSIP. While the demand associated with the Project could be accommodated in the short term by the surplus identified by the SCWA, in the long term, project demand would be greater than this surplus. Therefore, because the Project's long-term demand would exceed projected supply and infrastructure was not assumed for the West and South Study Areas, the Project's contribution to significant cumulative water supply and infrastructure impacts would be cumulatively considerable. See DEIR pages 5.12-25 and 5.12-26.

(b) **Mitigation Measures.** Mitigation Measure MM 5.12.1.1 (Plan for Services) is hereby adopted and will be implemented as provided by the Mitigation Monitoring and Reporting Program. There are established laws, regulations, and mechanisms in place that provide for such planning. These include

preparation of water supply assessments (WSAs) pursuant to California Water Code Section 10910, as applicable, and written verification of supply (California Government Code Section 66473.7).

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **Effects of Mitigation.** Mitigation measure MM 5.12.1.1 requires demonstration of adequate water supply prior to annexation through preparation of a Plan for Services prepared by the City and submitted to Sacramento LAFCo for approval. Condition (2) specifically requires that the Plan for Services demonstrate the water purveyor is a signatory to the Water Forum Agreement and that groundwater will be provided in a manner that ensures no overdraft will occur (i.e., the sustainable yield for the Central Basin will not be exceeded). LAFCo would condition future annexations on compliance with mitigation measure MM 5.12.1.1.

(2) **Remaining Impacts.** Implementation of mitigation measure MM 5.12.1.1 is intended to ensure that sufficient water supplies are available to meet the demand of new development in the Planning Area, in addition to existing and planned development under normal, single-dry, and multiple-dry years. However, the identification of potential supplies and their management is not within the purview of the City to implement. Provision of water supplies and distribution infrastructure may also result in significant environmental impacts, which cannot be determined at this time, and therefore the cumulative impacts would remain significant and unavoidable.

(3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative impact of the Project resulting from increased demand water supply and infrastructure, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

4. Cumulative Wastewater Impacts (EIR Impact 5.12.2.3)

(a) **Potential Impact.** Future development in the Sacramento Regional County Sanitation District (Regional San) service area would result in an incremental cumulative demand for wastewater and related services at the Sacramento Regional Wastewater Treatment Plant (SRWTP). The SRWTP has been master planned to accommodate future growth in the Regional San service area, and the plant would be expanded and upgraded to respond to future growth. The construction of these facilities would result in associated environmental impacts. The Project would generate wastewater that would require treatment at the SRWTP, increasing demand beyond that assumed for the plant, and therefore would contribute to the need for expanded capacity, the construction of which could result in significant environmental effects, which cannot be determined at this time. The Project's contribution would be cumulatively considerable. See DEIR pages 5.12-31 and 5.12-32.

(b) **Mitigation Measures.** Mitigation measures to reduce or avoid significant environmental impacts of SRWTP improvements would not be within the City's purview to implement. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **No further mitigation.** No additional feasible mitigation available beyond compliance with existing laws and proposed General Plan policies.

(2) **Remaining Impacts.** The design and location of any future improvements at the SRWTP that may be required to accommodate the Project's increased contribution is at the discretion of Regional San and is currently unknown. The DEIR cannot adequately assess the potential environmental impacts of such improvements without speculation. Therefore, the cumulative impact would remain significant and unavoidable.

(3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse cumulative impact of the Project resulting from need to expand wastewater treatment facilities, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

J. Transportation

1. City Roadways and Intersections Operations (Project-Level and Cumulative EIR Impact 5.13.1)

(a) **Potential Impact.** The Project includes land use and transportation network changes that would increase future traffic volumes on City roadways. Numerous intersections and roadway segments would exceed the current General Plan LOS thresholds. Applying the policies of the existing General Plan would require expanding the capacity of the impacted roadways and intersections. Capacity expansion beyond the lanes identified on Figure 5.13-10 was not considered feasible by the City due to right-of-way impact, environmental impacts including induced travel (i.e., increased VMT), and inconsistency with both complete street concepts to accommodate all modes and users, and community values like maintaining the unique character of the City. Therefore, the Project makes policy accommodations that support complete street concepts and community values and also eliminates LOS as a significance threshold for the evaluation of transportation projects under CEQA, consistent with the requirements of SB 743 and pending State guidance. By incorporating these policies, the General Plan Update would result in a transportation system that allows greater utilization of the roadway system, which would minimize the need to expand existing capacity, so that the City can focus on building complete streets, improving walking and biking as viable travel options, and making transit more effective. A key part of these changes is a shift from automobile LOS to the VMT metrics embedded in Policy MOB-1-1, which will require new development projects to reduce VMT, which may contribute to lower peak hour traffic volumes. However, even with implementation of these policies and potential lower peak hour traffic volumes, the Project would still result in decreases in LOS in the City and would result in a significant impact related to LOS. See DEIR pages 5.13-38 through 5.13-53.

(b) **Mitigation Measures.** General Plan Policy MOB-1-1 requires future development projects to demonstrate a 15 percent reduction in VMT from

existing (2015) conditions. To support the VMT reductions incorporated into Policy MOB-1-1, the Project includes policies to support development of complete streets (MOB-3-1 through MOB-3-9), mobility for all system users (MOB-3-10 through MOB-3-13), managed parking supply (MOB-3-14 through MOB-3-17), improvements to the bicycle and pedestrian network (MOB-4-1 through MOB-4-3), transportation demand management (MOB-4-4 through MOB-4-5), and transit (MOB-5-1 through MOB-5-10). However, there is no additional feasible mitigation beyond compliance with General Plan Update policies that would further lessen these impacts or reduce them to less than significant.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **No further mitigation.** No additional feasible mitigation available beyond compliance with proposed General Plan policies

(2) **Remaining Impacts.** VMT reductions may be achieved through the implementation of individual development projects in the future and increasing roadway capacity would improve LOS on affected roadways. However, the increased capacity would result in other physical environmental effects associated with increased VMT, such as increased emissions of criteria pollutants and greenhouse gases. Because increased roadway capacity contributes to increased VMT, it would also be inconsistent with Project objective #5, which is intended to reduce vehicle miles traveled, improve air quality, and reduce energy usage. There is no additional feasible mitigation available, and the impact on level of service conditions at some intersections and on some roadway segments would remain significant and unavoidable.

(3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impact on intersection and roadway segment operations, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

2. **Caltrans Facilities (SR 99 and I-5) Operations (Project-Level and Cumulative EIR Impact 5.13.2)**

(a) **Potential Impact.** The Project includes land use and transportation network changes that would increase future traffic volumes on SR 99 and I-5 (Caltrans facilities). All study segments of SR 99 and I-5 would operate at LOS F in 2036. Implementation of the Project would contribute to unacceptable operations on these facilities. However, even with implementation of these policies and potential lower peak hour traffic volumes, the Project would still result in a significant impact related to LOS on Caltrans facilities. See DEIR page 5.13-34.

(b) **Mitigation Measures.** In addition to General Plan Update policies referenced in subsection III.J.1.a, above, the General Plan Update includes policies that address coordination with regional partners, including Caltrans, for shared roadway improvements that may include joint planning efforts, roadway construction, and funding of improvements on SR 99 and I-5. There is no additional feasible mitigation beyond compliance with General Plan Update

policies that would further lessen these impacts or reduce them to less than significant. In addition, because SR 99 and I-5 are under the jurisdiction of Caltrans, these facilities are outside the City's jurisdiction to implement improvements that would mitigate impacts. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **No further mitigation.** No additional feasible mitigation available beyond compliance with proposed General Plan policies.

(2) **Resulting Impacts.** General Plan Update policies address coordination with regional partners, including Caltrans, for shared roadway improvements that may include joint planning efforts, roadway construction, and funding of improvements on SR 99 and I-5. However, even with implementation of these policies and potential lower peak hour traffic volumes, the Project would still add trips to and negatively affect LOS on Caltrans facilities, and the impact would remain significant and unavoidable.

(3) **Overriding Considerations.** Mitigation measures that would reduce the Project impacts are outside the City's jurisdiction to implement improvements. The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impacts related to Caltrans facilities (SR 99 and I-5) operations, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

3. Vehicle Miles Traveled (Project-Level and Cumulative EIR Impact 5.13.3)

(a) **Potential Impact.** The Project would allow for population growth that would result in an increase in VMT compared to existing baseline conditions. VMT performance, measured as VMT per service population, in some areas would result in an average service population VMT 15 percent below the City's existing baseline limit (average VMT per service population is 12.0) and would satisfy the thresholds presented in Policy MOB-1-1, if new development is built to the specifications consistent with the General Plan Land Use Diagram. However, there are also areas that would exceed the 15 percent per service volume threshold and would require project modification or other reduction strategies to satisfy the threshold, and the effectiveness of VMT reduction strategies is not certain. This is a potentially significant impact. See DEIR pages 5.13-55 through 5.13-60.

(b) **Mitigation Measures.** To support the VMT reductions incorporated into Policy MOB-1-1, the Project includes policies to support development of complete streets (MOB-3-1 through MOB-3-9), mobility for all system users (MOB-3-10 through MOB-3-13), managed parking supply (MOB-3-14 through MOB 3 17), improvements to the bicycle and pedestrian network (MOB-4-1 through MOB-4-3), transportation demand management (MOB-4-4 through MOB-4-5), and transit (MOB-5-1 through MOB-5-10), which support the VMT reductions incorporated into Policy MOB-1-1. However, there is no additional feasible mitigation available beyond compliance with General Plan Update policies

that would further lessen these impacts or reduce them to less than significant. Therefore, mitigation is considered infeasible.

(c) **Findings.** Based on the DEIR and the entire record before this City Council, this City Council finds that:

(1) **No further mitigation.** No additional feasible mitigation available beyond compliance with proposed General Plan policies.

(2) **Remaining Impacts.** Even with implementation of General Plan Update policies, some areas in the Planning Area will still not achieve the VMT reductions specified in Policy MOB-1-1 and the effectiveness of VMT reductions strategies is not certain. In addition, disruptive changes occurring in transportation, such as transportation network companies (i.e., Uber, Lyft), autonomous vehicles, Mobility as a Service (i.e., ride-sharing, car-sharing), Amazon (increased deliveries), may increase VMT. There is limited right-of-way for physical (i.e., capacity) improvements along the Elk Grove Boulevard corridor and the corridor is largely constructed to its General Plan designation as a six-lane arterial. There is limited right-of-way for physical improvements along Big Horn Boulevard, which is constructed to its General Plan designation as a four-lane arterial. The impact related to VMT would remain significant and unavoidable.

(3) **Overriding Considerations.** The environmental, economic, social, and other benefits of the Project override any remaining significant adverse impacts related to VMT, as more fully stated in the Statement of Overriding Considerations in Section VIII of this document.

IV. Findings and Recommendations Regarding Significant Impacts Which Are Avoided or Mitigated to a Less Than Significant Level

A. Cultural Resources

1. Historical Resources, Archaeological Resources, Tribal Cultural Resources, and Human Remains (EIR Impact 5.5.1)

(a) **Potential Impact.** The NCIC records search and AB 52 and SB 18 Native American consultation completed for the Project identified historical resources, archaeological resources, and tribal cultural resources throughout the Planning Area. There are likely previously unidentified historical resources, archaeological resources, tribal cultural resources, and human remains within the Planning Area. Therefore, it is possible that the excavation and grading required to construct future developments could impact these resources. Future development under the Project could also impact known built resources, such as those listed in the Community and Resource Protection chapter of the General Plan. It is also possible that construction activities could damage or destroy as-yet undiscovered resources or human remains, if present, if procedures are not in place to manage them if found. This is a potentially significant impact. See DEIR pages 5.5-11 and 5.5-12.

(b) **Mitigation Measures.** General Plan Update Project mitigation measures MM 5.5.1a and MM 5.5.1b are hereby adopted and will be implemented as provided by the Mitigation Monitoring and Reporting Program. In addition,

General Plan Update Policy HR-2-2 requires consultation with Native American tribes, the Native American Heritage Commission, and any other appropriate organizations and individuals prior to project approval and construction to minimize potential impacts to archaeological resources and tribal cultural resources. Policy HR-233 requires project applicants for future projects to identify and evaluate cultural resources; when resources are identified, implementation of Policy HR-2-4 would foster the preservation, rehabilitation, and maintenance of historic, archaeological, and tribal resources. Policy HR-3-2 would limit impacts on built environment resources, and Policy HR-1-3 encourages appropriate adaptive reuse of historic resources to prevent misuse, disrepair, and demolition, would also limit impacts on built environment resources. Even more generally, Policy HR-1-2 encourages preservation of historic buildings and resources.

(c) **Findings.** Based on the EIR and the entire record before this City Council, this City Council finds that:

(1) **Effects of Mitigation.** Mitigation measure MM 5.5.1a requires that future projects complete cultural resources studies to identify cultural resources, evaluate potential effects, and develop mitigation according to CEQA and/or the National Historic Preservation Act (NHPA). Mitigation measure MM 5.5.1b addresses the potential for encountering undiscovered cultural resources and tribal cultural resources. If human remains are discovered during construction, Public Resources Code Section 5097.98 and California Health and Safety Code Section 7050.5, detailed in the CEQA regulatory section above, would be followed. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed. These measures and California State laws require that construction and/or grading be halted upon discovery of cultural resources, tribal cultural resources, or human remains and that the resources discovered are protected using measures specific to the resource as determined by a qualified professional. Implementation of these mitigation measures and laws would reduce impacts to less than significant.

(2) **Remaining Impacts.** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

2. **Cumulative Cultural Resources/Tribal Cultural Resources Impacts (EIR Impact 5.5.2)**

(a) **Potential Impact.** Implementation of the Project has the potential to contribute to cumulative impacts on cultural resources, including archaeological and historic resources, as well as interred human remains. The past, present, and foreseeable projects have affected, or will affect, cultural resources throughout the region despite the federal, State, and local laws designed to protect them. These laws have led to the discovery, recording, preservation, and curation of artifacts and historic structures; however, more may have been destroyed in the period before preservation efforts began or are inadvertently destroyed during grading and excavation for construction.

While past projects constructed prior to protection measures have negatively affected historic and prehistoric resources, implementation of mitigation measures MM 5.5.1a and MM 5.5.1b would ensure that the Project's contribution to the cumulative impact would be less than cumulatively considerable. See DEIR page 5.5-14.

(b) Mitigation Measures. General Plan Update Project mitigation measures MM 5.5.1a and MM 5.5.1b are hereby adopted and will be implemented as provided by the Mitigation Monitoring and Reporting Program.

(c) Findings. Based on the EIR and the entire record before this City Council, this City Council finds that:

(1) Effects of Mitigation. Mitigation measure MM 5.5.1a requires that future projects complete cultural resources studies to identify cultural resources, evaluate potential effects, and develop mitigation according to CEQA and/or the National Historic Preservation Act (NHPA). Mitigation measure MM 5.5.1b addresses the potential for encountering undiscovered cultural resources and tribal cultural resources. If human remains are discovered during construction, Public Resources Code Section 5097.98 and California Health and Safety Code Section 7050.5, detailed in the CEQA regulatory section above, would be followed. No additional mitigation is required beyond compliance with existing laws and regulations, General Plan Update policies, and mitigation measures MM 5.5.1a and MM 5.5.1b.

(2) Remaining Impacts. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

B. Hazardous Materials

1. Hazardous Materials Contamination (EIR Impact 5.8.2)

(a) Potential Impact. Three locations in the Planning Area are on the Cortese List. Over the planning horizon, some sites may be removed and new sites may be added. Not all locations in the Planning Area where future development may occur have been evaluated for potential contamination. Contaminated soil could be encountered during soil-disturbing activities such as excavation and trenching and dust from contaminated soil could be dispersed beyond a construction site. Contaminated groundwater may also be present. Single-family homes, multifamily residences, and structures with subterranean features (e.g., parking garage) constructed on a site where hazardous materials contamination has not been remediated to acceptable risk levels could pose a risk to occupants through direct contact (e.g., soil disturbance) or inhalation (soil vapor). Older structures that may be demolished or renovated to accommodate future development could contain asbestos and/or lead-based paint. Each of these situations could pose a threat to public health and the environment if not properly managed. This is a potentially significant impact. See DEIR pages 5.8-18 and 5.8-19.

(b) Mitigation Measures. General Plan Update Project mitigation measure MM 5.8.2 is hereby adopted and will be implemented as provided by the Mitigation Monitoring and Reporting Program. In addition, General Plan

Update Policy EM-1-1, which seeks to maintain acceptable levels of risk of injury, death, and property damage resulting from reasonably foreseeable safety hazards would be applicable to the investigation and cleanup of contaminated sites.

(c) **Findings.** Based on the EIR and the entire record before this City Council, this City Council finds that:

(1) **Effects of Mitigation.** Mitigation measure MM 5.8.2 requires that properties that have not already been investigated for the potential for hazards and/or hazardous materials have Phase I ESAs prepared, which would identify if any hazards exist, and if so, how those hazards can be safely managed. This mitigation measure would ensure that hazardous materials, if found, are properly remediated and are not released into the environment, where they could pose a threat to human health or the environment. Remediation activities, such as excavation of contaminated media or treatment systems, could involve activities that result in the release of hazardous materials through dust or other emissions or extraction of contaminated groundwater, to name a few. Remediation projects are required to be implemented in accordance with established hazardous materials and waste laws and regulations. Moreover, the benefits of remediation generally outweigh the risks associated with the cleanup activities. This would reduce this impact to less than significant.

(2) **Remaining Impacts.** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

V. Other Impacts and Considerations

1. Growth-Inducing Impacts of the Project

CEQA Guidelines Section 15126.2(d) requires that an EIR evaluate the growth-inducing impacts of a proposed action.

(a) **Findings.** The Project would induce substantial population growth in the Planning Area, both directly and indirectly. Future infrastructure and roadway improvements would support such growth within the Planning Area. Because of the Project's potential to increase the City's housing supply and employment opportunities, the Project is considered to be growth-inducing. The environmental effects of this growth would result in substantial changes to demands for public services and utilities as discussed in Section 5.11, Public Services and Recreation and Section 5.12, Public Utilities. The effects of this growth are addressed in Sections 5.1 through 5.13 of the DEIR.

(b) **Explanation.** The General Plan Update would guide future development throughout the Planning Area and would both directly and indirectly induce growth. It would allow for the future construction of up to 47,836 new homes within the Planning Area, which would increase the City's population by approximately 157,319 residents to a total of 328,378 at buildout. This would represent an approximately 92 percent increase over the City's 2017 population. In addition, the Project would allow for substantial non-residential development throughout the Planning Area, resulting in an increase of 63 percent over the City's existing job pool. The Project would therefore induce

growth through the creation of permanent employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand. Annexation would allow for the extension of infrastructure into the Study Areas and make them available for future development including additional residential units and non-residential space. See DEIR pages 6.0-1 through 6.0-3.

2. Significant Irreversible Environmental Changes Involved if the Project is Implemented

CEQA Sections 21100(b)(2) and 21100.1(a) require that an EIR prepared for the adoption of a plan, policy, or ordinance of a public agency must include a discussion of significant irreversible environmental changes of project implementation.

(a) **Findings.** Based on the DEIR and the entire record before this City Council, the Project could consume more energy and natural resources and result in significant irreversible impacts.

(b) **Explanation.** Because the Project is a long-range plan and not a development project, the Project does not itself propose any new development or other physical changes which could result in significant irreversible environmental effects. However, the Project would allow for future buildout of the proposed Land Use Diagram, which constitutes a long-term commitment to residential, non-residential, and public land uses. It is unlikely that circumstances would arise that would justify the return of the land to its original condition. Buildout of the Planning Area would irretrievably commit building materials and energy to the construction and maintenance of buildings and infrastructure proposed. Renewable, nonrenewable, and limited resources would likely be consumed as part of future development projects under the General Plan Update and would include, but would not be limited to, oil, fuels, lumber, sand and gravel, asphalt, water, steel, and similar materials. In addition, build out of the Planning Area would result in increased demand on public services and utilities. See DEIR pages 6.0-3 and 6.0-4.

VI. Project Alternatives

A. Background – Legal Requirements

CEQA requires that EIRs assess feasible alternatives or mitigation measures that may substantially lessen the significant effects of a project prior to approval (Public Resources Code Section 21002). With the exception of the No Project Alternative, the specific alternatives or types of alternatives that must be assessed are not specified. CEQA “establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR. Each case must be evaluated on its own facts, which in turn must be reviewed in light of the statutory purpose” (*Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal.3d. 553, 566 [1990]). The legislative purpose of CEQA is to protect public health, welfare, and the environment from significant impacts associated with all types of development, by ensuring that agencies regulate activities so that major consideration is given to preventing environmental damage while providing a decent home and satisfying living environment for every Californian (Public Resources Code Section 21000). In short, CEQA assists in avoiding or mitigating environmental damage associated with development. This has been largely accomplished in the Project through the inclusion of Project modifications and mitigation measures that reduce the potentially significant impacts to an acceptable level. The courts have held that a public agency “may approve a developer’s choice of a project once its significant adverse environment effects have been reduced to an acceptable level—that is, all avoidable

significant damage to the environment has been eliminated and that which remains is otherwise acceptable" (*Laurel Hills Homeowners Assoc. v. City*, 83 Cal.App.3d 515, 521 [1978]).

B. Identification of Project Objectives

The CEQA Guidelines state that the "range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant effects" of the project (CEQA Guidelines Section 15126.6(c)). Thus, consideration of the Project objectives is important to determining which alternatives should be assessed in the EIR.

The City has identified the following objectives for the Project:

- 1) Provide for growth of the City to meet long-term needs, including housing, employment, and recreational opportunities.
- 2) Facilitate orderly and logical development, including economic development, while maintaining the character of existing communities.
- 3) Provide an improved transportation system that includes an array of travel modes and routes, including roadways, mass transit, walking, and cycling.
- 4) Protect open space, providing trails, parkland, and a range of recreational opportunities.
- 5) Provide mechanisms to minimize noise and safety risks associated with natural and human-caused noise and safety hazards.
- 6) Promote sustainability and community resiliency through reductions in vehicle miles traveled, improved air quality, reductions in energy usage, and a diversified economy.
- 7) Provide and support public facilities and infrastructure with sufficient capacity to adequately serve the needs of the growing community.

VII. Alternatives Analysis in the DEIR

1. Alternatives Considered But Not Selected for Analysis

Alternatives may be removed from further consideration in an EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid or substantially reduce any environmental effects (CEQA Guidelines Section 15126.6[c]). Additionally, alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, also do not need to be considered (CEQA Guidelines Section 15126[f][2]). The City considered two alternatives that ultimately were determined infeasible and these alternatives were removed from further consideration.

(a) Alternative Location/Off-Site Alternative.

- (i) Findings.** The Alternative Location/Off-Site Alternative is rejected as a feasible alternative and not selected for analysis in the DEIR.

(ii) Explanation. The General Plan Update addresses areas within the City and potential expansion areas directly adjacent to City boundaries that are in Sacramento County. It addresses planning changes within the City and Study Areas, some of which are in ongoing planning processes by the City and private parties and may be added to the City's Sphere of Influence. Consideration of lands beyond the identified Study Areas is infeasible because of existing municipal boundaries, natural features, or Local Agency Formation Commission (LAFCo) regulations, which discourage planning of areas that are not contiguous with existing boundaries. Thus, the areas available for planning are inherently limited. Any alternatives involving alternative or off-site areas are infeasible. See DEIR page 7.0-7.

(b) Reduced Density/Intensity Alternative.

(i) Findings. The Reduced Density/Intensity Alternative is rejected as a feasible alternative and not selected for detailed analysis in the DEIR.

(ii) Explanation. This alternative would have fewer residences and less office space. Although this alternative would reduce community impacts such as air quality, greenhouse gas (GHG) emissions, traffic, noise, and demand for utilities and public services, it would not achieve or would only partially achieve General Plan Update objectives of providing for growth of the City, providing an improved transportation system, and reducing vehicle miles traveled (VMT). Further, such an alternative would not be consistent with regional planning and could increase development pressure in other areas. Therefore, this alternative is infeasible. See DEIR page 7.0-7.

Alternatives Analyzed in the DEIR

The CEQA Guidelines state that the "range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant effects" of the project. The City evaluated the five alternatives listed below.

2. No Project Alternative (Alternative 1)

The No Project Alternative is evaluated on pages 7.0-16 through 7.0-18. This alternative assumes implementation of the existing General Plan (2003) instead of the General Plan Update. Under this alternative, the existing General Plan land uses would remain in place and development in the City would occur as anticipated in the 2003 General Plan, with an emphasis on carefully managed growth and buildout of the Southeast Policy Area (SEPA) and the Laguna Ridge area.

(a) Findings. The No Project Alternative is rejected as a feasible alternative. Although it would avoid all the significant impacts of the Project in the short-term, it would not achieve any of the Project objectives and would not have the beneficial effect of reducing GHG emissions consistent with the 2017 AB 32 Scoping Plan.

(b) Explanation. The No Project Alternative would either avoid or reduce the intensity of several impacts identified as significant and unavoidable impacts in the General Plan Update. These include impacts on aesthetics, agricultural land, air quality, biological resources, cultural and paleontological resources, groundwater supplies, traffic noise, construction of schools and utilities, and transportation plans and

policies, but it would not be consistent with SB 32 or the City's CAP, which require implementation of measures to reduce GHG emissions. This alternative would not achieve (or would only partially achieve) the Project objectives. Because the No Project Alternative would not promote further sustainability policies, the impacts associated with greenhouse gases and air quality would be greater than for the Project. The No Project Alternative may not be as consistent with the provisions of SB 375 and SB 743 and the VMT-reducing policies from the 2017 Scoping Plan. These plans and regulations are designed, in part, to reduce potential climate change impacts associated with GHG emissions and to meet goals for 2020, 2030, and 2050. Therefore, the No Project Alternative would result in greater environmental impacts than the General Plan Update with respect to consistency with a plan or regulation designed to reduce impacts to the environment. This alternative would not realize the benefits of the Project or achieve the Project objectives.

3. Additional Climate Action Plan Measures Alternative (Alternative 2)

The Additional Climate Action Plan Measures Alternative is evaluated on pages 7.0-18 through 7.0-20 in the DEIR. Under this alternative, the changes to the CAP could include additional building and development requirements for conservation of electricity, natural gas, and water; additional transportation sector measures (e.g., transit-oriented development, pedestrian and bicycle measures, improved public transit, efficient and alternative vehicles); and purchasing and surrendering offset credits. These measures and emissions reductions would put the City closer to achieving the State's 2050 targets.

(a) Findings. The Additional Climate Action Plan Measures Alternative is rejected as a feasible alternative. Although it meets the Project objectives and would provide additional GHG emissions compared to the Project, it would still result substantially similar significant and unavoidable physical environmental impacts as the project.

(b) Explanation. Overall, this alternative would have the same impacts as the Project but would be consistent with AB 32, SB 32, and the City's CAP, which require implementation of measures to reduce GHG emissions. This alternative would achieve all Project objectives and would increase the probability of achieving 2050 GHG reduction targets. Regarding consistency with regional plans, this alternative would be consistent with the Sacramento Area Council of Governments' (SACOG) current Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and would be consistent with the 2017 AB 32 Scoping Plan. Therefore, this alternative would result in lower GHG emissions impacts than the General Plan Update.

The Additional Climate Action Plan Measures Alternative would involve the same Planning Area as the Project and would require the same mitigation measures, but it would reduce the intensity of the significant and unavoidable impact identified in the General Plan Update for GHG emissions approaching 2050. Other significant and unavoidable impacts, including on aesthetics, agricultural land, air quality, biological resources and conservation planning, cultural and paleontological resources, groundwater supplies, traffic noise, construction of schools and utilities, and transportation plans and policies, would be the same.

4. Reduced Study Areas Alternative (Alternative 3)

The Reduced Study Areas Alternative is evaluated on pages 7.0-20 through 7.0-22 in the DEIR. This alternative reduces the extent of the Study Areas to those areas within the

existing Sacramento County Urban Services Boundary as well as the area included in the Kammerer/99 Sphere of Influence Amendment that was filed by a private developer for the area south of Kammerer Road and west of SR 99 and approved in February 2018. This would result in a reduction in the size of the West and South Study Areas. The East and North Study Areas would remain the same as with the Project. Reducing the study areas would not preclude the development of areas outside the USB consistent with the existing Sacramento County General Plan and potential future amendments as development is proposed. For example, this could include development within the area south of Grant Line Road, for which Sacramento County is undertaking a visioning process.

(a) Findings. The Reduced Study Areas Alternative is rejected as a feasible alternative. The Reduced Study Areas Alternative would occur on a smaller footprint than the Project; thus, impacts on natural resources would be the less. However, although it generally meets the Project objectives, this alternative would reduce the footprint of the Study Areas by nearly one half without increasing development density, thus resulting in a reduction in development compared to the proposed Project. This substantial reduction in overall development due to the reduction in footprint would make this alternative inconsistent with the first Project Objective: Provide for growth of the City to meet long-term needs, including housing, employment, and recreational opportunities.

(b) Explanation. Impacts would be similar to the Project, but because it would encompass a smaller area that would not include portions of the South and West Study Areas, this alternative would reduce, but not avoid, some of the impacts of the Project, including impacts that would be significant and unavoidable. The Reduced Study Areas Alternative would generally achieve most of the Project objectives and would be consistent with regional plans, including SACOG's current MTP/SCS, and would be consistent with the 2017 AB 32 Scoping Plan because it could reduce GHG emissions compared to the Project. Because it would not involve development beyond the existing USB, it would not require mitigation measure MM 5.12.1.1, which requires the City to prepare and submit to LAFCo for approval a Plan of Services for areas proposed for annexation. The Reduced Study Areas Alternative would reduce the intensity of several impacts identified as significant and unavoidable for the Project. These include impacts on aesthetics, agricultural land, air quality, biological resources and conservation planning, cultural and paleontological resources, GHG emissions in 2050, groundwater supplies, traffic noise, construction of schools and utilities, and transportation plans and policies.

5. Increased Development Intensity Alternative (Alternative 4)

The Increased Development Intensity Alternative is evaluated on pages 7.0-22 and 7.0-23 in the DEIR. This alternative increases the allowable residential density and non-residential development intensity for selected key sites around the City. Land use designations for several sites would be changed from Low Density Residential (LDR) to High Density Residential (HDR). This alternative could accommodate up to 515 more High Density Residential units, 89 Medium Density Residential units, and 597 Mixed Use Village Center units. Low-density units and mixed-use residential units would be reduced by 148 and 65 units, respectively. Overall, this alternative could result in up to 988 additional dwelling units compared to the Project. This alternative would also generate approximately 300 more jobs due to the increase in Mixed Use Village Center acreage.

(a) Findings. The Increased Development Intensity Alternative is rejected as a feasible alternative. Although it would achieve most of the Project objectives, due to increased density in some areas, this alternative could result in more intense localized impacts on aesthetics and other community impacts, such as noise and traffic and could increase GHG emissions and may not be consistent with the updated CAP and the 2017 AB 32 Scoping Plan.

(b) Explanation. The Increased Development Intensity Alternative would occur on the same footprint as the Project; thus, impacts on natural resources would be the same. However, due to increased density in some areas, this alternative could result in more intense localized impacts on aesthetics and other community impacts, such as noise and traffic. This alternative would achieve most of the Project objectives and could be consistent with regional plans, including SACOG's current MTP/SCS, through infill development. However, this alternative could increase GHG emissions and may not be consistent with the updated CAP and the 2017 AB 32 Scoping Plan compared with the Project. The addition of high-density residential development under this alternative would help the City meet its future housing allocation. However, this alternative could add housing that could be considered out of proportion with the number of jobs created over the same period, resulting in a lower jobs-housing balance, additional traffic, and higher VMT. This alternative facilitates development on vacant or underutilized lots in the City while also providing opportunities for purposeful expansion.

6. Increased Employment Alternative (Alternative 5)

The Increased Employment Alternative is evaluated on pages 7.0-24 and 7.0-25 in the DEIR. This alternative would increase the amount of office development compared to the Project, resulting a greater number of jobs in the City. Specifically, south of Bilby Road in Sterling Meadows, the High Density Residential area would be increased by approximately 11.5 acres, and approximately 28 acres of the area designated as residential land use along Kammerer Road would be changed to Employment Center. The remaining 29 acres would be Medium Density Residential. The Commercial sites to the west of Promenade Parkway, as well as the majority of Opportunity Site 2 (except the portions designated as High Density Residential and Commercial), would also be changed to Employment Center. This alternative would yield approximately 330 fewer housing units and as many as 5,700 more jobs than the Project.

(a) Findings. The Increased Employment Alternative is rejected as a feasible alternative. Although it would achieve most of the Project objectives, it would generally result in the same physical environmental impacts as the Project.

(b) Explanation. The Increased Employment Alternative would have the same footprint as the Project and would have similar impacts on agricultural lands and habitats to the south. Increased employment could allow for reductions in VMT compared to the Project, which could result in the generation of fewer criteria air pollutant emissions and greenhouse gases. However, the increased intensity of development under this alternative would increase demand on services and utilities as compared to the proposed Project. This alternative would achieve most of the Project objectives and would be consistent with regional plans, including SACOG's current MTP/SCS, through employment development that would be consistent with the 2017 AB 32 Scoping Plan.

6. Environmentally Superior Alternative

The environmentally superior alternative is discussed on pages 7.0-27 and 7.0-28 in the DEIR. Under CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the No Project Alternative, another environmentally superior alternative must be identified. The DEIR identified the Reduced Study Areas Alternative as the environmentally superior alternative. The Reduced Study Areas Alternative would reduce the General Plan footprint by 3,938 acres without increasing development density. This alternative would reduce the footprint-related impacts on farmland, habitat, cultural resources, topsoil, and water quality. Due to the reduction in development compared to the Project in these Study Areas, it would also reduce operational impacts, such as traffic, GHG emissions in 2050, groundwater supplies, traffic noise and air emissions, and construction of schools and utilities. Thus, this would reduce the areal extent and scope of all the environmental impacts of the Project.

VIII. Statements of Overriding Considerations Related to the General Plan Update Project Findings

A. Regional Context and Growth Management. The General Plan focuses on communicating the role Elk Grove plays in the larger Sacramento area and moving Elk Grove forward as a prominent player in the region. The Project strikes a desirable balance between growth—and the requisite increase in jobs, development, and amenities—and preserving existing structures, resources, and community character. These items are not necessarily in direct competition, but they can become so if growth is not managed carefully and aligned with community desires and values. By establishing clear parameters for future development (such as Goal LU-3 and corresponding policies regarding future land plans and process and requirements for annexation applications), the General Plan facilitates development on vacant or underutilized lots in the City while also providing opportunities for purposeful expansion aligned with the Community Vision and regional growth objectives.

The Project specifically provides the ability to meet long-term needs in housing (by identifying opportunities for an additional 49,000 dwelling units) and employment (with capacity for an additional 76,000 jobs) and foster development patterns that will achieve a complete community with respect to increasing jobs and economic development and increasing the City's jobs-to-employed resident ratio.

The Project ensures that the character of Elk Grove, based on a legacy of agriculture and a rural lifestyle with specific areas identified for urban and suburban development, is preserved. Rural housing and infrastructure options continue to protect agricultural uses by identifying specific areas for continued agricultural operation and areas that preserve rural character and qualities. Further, the Project maintains policies regarding right-to-farm and provides buffering between agricultural operations and urban development.

Land use policies provide for the orderly and logical development of the City, particularly in areas to be annexed to the City, by requiring infrastructure in conjunction with new development and requiring phasing and financing plans as part of annexation projects. The Project also establishes organizing principles for annexing areas, with land use programs for each, which identify what and where development will occur over time.

Policies throughout the General Plan provide for the protection of and mitigation of impacts to the natural environment. Specifically, Policy LU-3-22 provides that a mitigation program for critical habitat for special-status species shall be prepared for future annexation applications. A proposed project determined to have a significant impact to habitat for special-status species shall implement all feasible mitigation measures established in the program, including but not limited to land dedication, payment of a fee, or both. Additional policies are provided in Chapter 7 (Community and Resource Protection), including Policy NR-1-2 (preserve and enhance natural areas that serve, or may potentially serve, as habitat for special-status species) and corresponding standards, and policies under Goal NR-2 (preserved trees and urban forest).

- B. Economic Benefits.** The Project supports balanced and diverse growth to increase the level of commercial and industrial activity in the City and improve opportunities for residents to work in the community and/or have improved accessibility to their place of employment. Economic development goals and policies focus on business retention and expansion, business attraction, and economic diversity by promoting workforce training opportunities and emphasizing employment sectors that are well matched for the skills of the local workforce, as well as encouraging the facilitation and attraction of companies in emerging industries, both known or to be identified. The Project also specifically identifies the development of a major employment center with enough available undeveloped land and potential sufficient transit access to support such a center. The Project identifies the continued investment in public infrastructure to attract target industries, such as improved broadband capacity and reliability, road construction and maintenance, public transit, new and upgraded public utilities, and adequate community services.

The Plan also reaffirms the City's ongoing commitment to the preservation of rural lands in Elk Grove's eastern portion, providing an opportunity to showcase this aspect of Elk Grove's heritage through agritourism.

A variety of housing across income levels and lifestyles, as provided through the Housing Element and sites around the City identified as implementation of the City's share of the Regional Housing Needs Allocation, creates options for employers and employees to live close to work or in an area with increased accessibility to work.

- C. Community Benefits.** The Project promotes a welcoming and thriving civic core, preservation of Old Town as a showcase for community heritage, and a continued focus on the integration of parks and schools as focal points in the community. The Project maintains the high level of safety, cleanliness, and well-kept amenities that characterize the City's local parks. Supporting walking and biking connections locally and regionally increases access to and enjoyment of both active and passive open spaces, including natural resources such as the Cosumnes River Preserve and the Stonelakes National Wildlife Refuge. The Project addresses sustainability and healthy living options in Elk Grove, such as improving resiliency to a changing climate, encouraging green technologies, and promoting resource conservation. The Project identifies opportunities and regulations (both local and State) that further per capita reductions in greenhouse gas emissions in both new and existing development. The Project considers the needs of all demographic segments of the community, including youth, the elderly, and disadvantaged families by providing access to a range of services and programs (such as under Goal CS-2) and addressing the decision-making process and community engagement through new governance

policies. The Project encourages access to public services that provide assistance for community members as well as promoting gathering spaces throughout the community that meet basic needs and improve the quality of life.

- D. Mobility.** The Project recognizes the need to tailor mobility infrastructure to an area's surrounding context, particularly in the eastern, more rural portions of the City where the population density is lower. A complete street in a rural area will be different from one in an urban area. The Project recognizes local, regional, and State transportation objectives, including vehicle miles traveled, reflecting a need to shift goals and policies regarding how roadway operations are measured and analyzed. The Project's transportation plan, in conjunction with the land use plan, provides for the reduction in vehicle miles traveled as buildout of the Project occurs over time. The Project provides for a range of transportation choices, including transit as a clean, safe, and accessible mobility option and promotes future development projects that incorporate transit and alternative transportation modes.
- E. Greenhouse Gas Reductions.** The Project includes a number of policies and implementing actions that continue the City's efforts to reduce carbon emissions and the production of greenhouse gases. Specifically, policies under Goal NR-5 (reduce greenhouse gas emissions that align with local, state, and other goals) provides specific thresholds for greenhouse gas impacts and policies under Goals NR-6 (reduced energy demand and increased renewable sources) and SD-1 and SD-2 (sustainable City management and green building) provide opportunities for reduction in greenhouse gas emissions.

Further, the Climate Action Plan provides implementation strategies that align with the City's greenhouse gas emissions thresholds and provide a way to achieve the State's adopted 2030 reduction goals and sets the stage for future 2050 objectives, pending further State guidance and legislation. Example strategies include, but are not limited to, promoting energy conservation and applicant upgrades, encouraging or requiring green building practices in new construction, increases in waste diversion rates, and construction of 30 (cumulative) new miles of bicycle lanes and trails. The Climate Action Plan, and accompanying Checklist, will serve as a tool for the City and future development applicants to determine if a project is eligible for the streamlining benefits provided under CEQA Guidelines Section 15183.5 and, if so, which reduction measures would be required to be included as mitigation measures or conditions of approval.

Based on the objectives identified for the Project, review of the Project, review of the EIR, and consideration of public and agency comments, the City has determined that the Project should be approved and that any remaining unmitigated environmental impacts attributable to the Project are outweighed by the specific social, environmental, land use, and other overriding considerations.

The City has determined that any environmental detriment caused by the General Plan Update Project has been minimized to the extent feasible through the mitigation measures identified herein, and, where mitigation is not feasible, has been outweighed and counterbalanced by the significant social, environmental, and land use benefits to be generated to the City.

Sources

City of Elk Grove. 2018. *Elk Grove General Plan Update Draft Environmental Impact Report*. SCH# 2017062058.

MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines, Section 15091(d), requires public agencies, as part of the certification of an environmental impact report, to adopt a reporting and monitoring program to ensure that changes made to the project as conditions of project approval to mitigate or avoid significant environmental effects are implemented. The Mitigation Monitoring and Reporting Program (MMRP) contained herein satisfy the requirements of CEQA as they relate to the General Plan Update (Project) in the City of Elk Grove (City). The MMRP is intended to be used by City staff, future development applicants, future development contractors, and mitigation monitoring personnel during implementation of the Project.

The MMRP will provide for monitoring of construction activities as necessary in-the-field identification and resolution of environmental concerns, and reporting to City staff. The MMRP will consist of the components described below.

COMPLIANCE CHECKLIST

Table 1 contains a compliance-monitoring checklist that identifies all adopted mitigation measures, identification of agencies responsible for enforcement and monitoring, and timing of implementation.

TABLE 1: MITIGATION MONITORING AND REPORTING PROGRAM

MM Number	Mitigation Measure	Timing/ Implementation	Enforcement/ Monitoring	Verification (date and Signature)
MM 5.5.1a	<p>Prior to the approval of subsequent development projects in the Planning Area, a detailed cultural resources study of the subject property shall be conducted by the applicant and peer reviewed by the City. The cultural resources study shall identify, evaluate, and mitigate impacts to cultural resources as defined by CEQA and/or the NHPA. Mitigation methods to be employed include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Redesign of the project to avoid the resource. The resource site shall be deeded to a nonprofit agency to be approved by the City for maintenance of the site. • If avoidance is determined to be infeasible by the City, the resource shall be mapped, stabilized, and capped pursuant to appropriate standards. • If capping is determined infeasible by the City, the resource shall be recovered to appropriate standards 	<p>Prior to the approval of subsequent development projects</p>	<p>Development Services</p>	
MM 5.5.1b	<p>If cultural resources or tribal cultural resources are discovered during grading or construction activities within the Planning Area, work shall halt immediately within 50 feet of the discovery, the Planning Department shall be notified, and a professional archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards in archaeology shall be retained to determine the significance of the discovery.</p> <p>If resources are determined to be potentially significant, the City shall require the preparation of a treatment plan and report of findings for cultural and tribal cultural resources. The City and the applicant shall consult and agree to implement all measures the City deems feasible. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The applicant shall be required to implement</p>	<p>During grading of development projects or other site improvements</p>	<p>Development Services</p>	

MM Number	Mitigation Measure	Timing/ Implementation	Enforcement/ Monitoring	Verification (date and Signature)
	measures necessary for the protection and documentation of cultural resources.			
MM 5.6.5	<p>Before the start of any earthmoving activities, the project owner shall retain a qualified scientist (e.g., geologist, biologist, paleontologist) to train all construction personnel involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures should fossils be encountered. Training on paleontological resources shall also be provided to all other construction workers but may use videotape of the initial training and/or written materials rather than in-person training.</p> <p>If any paleontological resources (fossils) are discovered during grading or construction activities within the project area, work shall be halted immediately within 50 feet of the discovery, and the City Planning Division shall be immediately notified. The project owner will retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (SVP 2010). The recovery plan may include but is not limited to a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City to be necessary and feasible will be implemented by the applicant before construction activities resume in the area where the paleontological resources were discovered.</p>	During grading of development projects or other site improvements	Development Services	
MM 5.8.2	Prior to approval of improvement plans, grading permits, and or demolition permits for properties in the Planning Area that have not already been evaluated for the potential for the presence of hazardous materials and hazardous conditions, Phase I ESAs shall be prepared by a qualified professional. Each Phase I ESA shall assess the potential for	Prior to approval of grading or improvement plans	Development Services	

MM Number	Mitigation Measure	Timing/ Implementation	Enforcement/ Monitoring	Verification (date and Signature)
	<p>hazards and provide recommendations whether additional investigation (Phase II ESA) should be completed. If determined necessary, a Phase II ESA shall be conducted to determine the lateral and vertical extent of soil, groundwater, and/or soil vapor contamination, as recommended by the Phase I ESA. The City shall not issue a grading or building permit for a site where contamination has been identified until remediation or effective site management controls appropriate for the site use have been completed consistent with applicable regulations and to the satisfaction of the Sacramento County Environmental Management Department, the California Department of Substances Control, and/or Central Valley Regional Water Quality Control Board, as appropriate. If the Phase I ESA determines there are no recognized environmental conditions, no further action is required. However, the City shall ensure any grading or improvement plan or building permit includes a statement that if hazardous materials contamination is discovered or suspected during construction activities, all work in the vicinity of the contamination shall stop immediately until a qualified professional has evaluated the site and determined an appropriate course of action.</p>			
MM 5.9.4	Implement mitigation measure MM 5.12.1.1 (Plan for Services).	See MM 5.12.1.1		
MM 5.12.1.1	<p>Prior to LAFCo approval of annexation of any portion of the Planning Area into the City of Elk Grove, the City must prepare the Plan for Services to allow LAFCo to determine that: (1) the requirement for timely water availability, as required by law, is met; (2) its water purveyor is a signatory to the Water Forum Successor Effort and that groundwater will be provided in a manner that ensures no overdraft will occur, (3) the amount of water provided will be consistent with the geographical extent of the annexation territory; and (4) existing water customers will not be adversely affected. The Plan for Services shall be sufficient for LAFCo to determine timely water availability to the affected territory pursuant to Government Code Section 56668,</p>	<p>Prior to LAFCo approval of annexation of any portion of the Planning Area</p>	<p>Development Services Sacramento LAFCo</p>	

MM Number	Mitigation Measure	Timing/ Implementation	Enforcement/ Monitoring	Verification (date and Signature)
	<p>subdivision (l), or its successor.</p> <p>The Plan for Services shall demonstrate that the water supplies are adequate to serve the amount of development identified in the annexation territory, in addition to existing and planned development under normal, single-dry, and multiple-dry years. The Plan for Services shall depict the locations and approximate sizes of all on-site water system facilities to accommodate the amount of development identified for the specific annexation territory; demonstrate that the service provider has annexed the territory into its service area; and demonstrate that adequate off-site water facilities are available to accommodate the development identified in the annexation territory, or that fair-share funding will be provided for the construction of new or expanded treatment and/conveyance facilities and/or improvement of existing off-site water system facilities with no adverse fiscal impacts on existing ratepayers.</p>			

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**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ELK GROVE
ADOPTING THE GENERAL PLAN**

**General Plan Update
Project No. PL0022**

WHEREAS, California Government Code Section 65300 requires the City adopt a comprehensive, long-term general plan for the physical development of the City; and

WHEREAS, the City adopted its first General Plan in on November 19, 2003; and

WHEREAS, since adoption of the General Plan in 2003, the City has grown and changed and numerous developer and City-initiated amendments to the current General Plan have been adopted, including, but not limited to, the following

- Laguna West, annexed 2004
- Laguna Ridge Specific Plan, adopted 2004
- Safety Element, updated 2005 and 2015
- Housing Element, updated 2009 and 2014
- Sustainability Element and Climate Action Plan, adopted 2013
- Southeast Policy Area Community Plan, adopted 2014; and

WHEREAS, since 2003, the City has not comprehensively updated its General Plan; and

WHEREAS, the conditions in the City and the requirements for general plans under State law have changed since 2003; and

WHEREAS, in 2015, the City Council directed that a comprehensive update to the City's General Plan be completed; and

WHEREAS, in accordance with Section 65351 of the California Government Code, the City has facilitated public participation in the General Plan process; and

WHEREAS, the City determined that the General Plan Update (also referred to herein as "Project") was a project requiring review pursuant to the California Environmental Quality Act (CEQA), Public Resources Code 21000 et seq. and that an Environmental Impact Report (EIR) shall be prepared to evaluate the potential environmental effects of the Project; and

WHEREAS, a Notice of Preparation was released for public and agency review and comment on June 23, 2017, for the General Plan Update Draft EIR, with the public review period starting June 23, 2017, and ending on July 24, 2017, and a public scoping meeting to receive comments on topics and issues which should be evaluated in the Draft EIR was held by the City on July 11, 2017; and

WHEREAS, upon receipt of the Notice of Preparation, the State Clearinghouse issued State Clearinghouse Number SCH#2017062058 for the Project; and

WHEREAS, the draft General Plan was released for public review on July 27, 2018, and was made available at City Hall, at the Elk Grove and Franklin Public Libraries, and on the City's website; and

WHEREAS, in accordance with Government Code Section 65352, the City referred the proposed draft General Plan to numerous agencies and entities and provided each with adequate time in which to comment on the draft General Plan; and

WHEREAS, the City distributed a Notice of Availability for the General Plan Update Draft EIR on July 27, 2018, which started a public review period, ending on September 26, 2018; and

WHEREAS, the Notice of Completion for the Draft EIR was also submitted to the State Clearinghouse for state agency review with Public Review Period starting July 27, 2018, and ending on September 26, 2018; and

WHEREAS, the City held a public meeting on September 13, 2018, to receive public comments on the Draft EIR and those comments were received and considered in the Final EIR; and

WHEREAS, the Draft EIR identified several significant and unavoidable environmental impacts of the General Plan. Approval of the General Plan therefore requires the adoption of a Statement of Overriding Considerations by the City Council; and

WHEREAS, the Draft EIR identified several potentially significant impacts that will be reduced to insignificance with specific mitigation measures. Approval of the General Plan will therefore require adoption of mitigation findings and a Mitigation Monitoring Program; and

WHEREAS, a Final EIR has been prepared, identifying an erratum of changes to the Draft EIR as a result of the public comments on the Project, the comments to the Draft EIR, and other revisions to the Project, as identified by the City; and

WHEREAS, the Draft and Final EIR, including the response to the public comments, reflects the City's independent judgment and analysis; and

WHEREAS, the Planning Commission held a duly-noticed public hearing on January 17, 2019, as required by law to consider all of the information presented by staff and public testimony presented in writing and at the meeting and voted 4-0 to recommend adoption of the General Plan to the City Council; and

WHEREAS, the City Council held a duly-noticed public hearing on February 27, 2019, as required by law to consider all of the information presented by staff and public testimony presented in writing and at the meeting.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Elk Grove hereby rescinds and repeals all prior City of Elk Grove General Plans and hereby adopts the updated General Plan, dated July 2018, (provided as Exhibit A, incorporated herein by this reference) and as amended to include all the changes provided in Exhibit B, Errata to the General Plan (incorporated herein by this reference), based upon the following finding:

General Plan Amendment

Finding: The proposed General Plan Update is of substantial benefit to the City and the amendment is internally consistent with the General Plan.

Evidence: The proposed General Plan has been informed by eight issues and considerations, including *regional role; growth management; economic vitality; community identify; rural and agricultural heritage; parks, trails and open space; mobility; healthy living; and community services*. These considerations have formed the foundation for the General Plan's updated *Community Vision* that notes the City as a "diverse, healthy, safe, and family-oriented" community with "thriving schools and plentiful parks, shops, and places to work." Building upon this Vision, the General Plan establishes nine *supporting principles* that are:

- Regional Goals & Influence – Our regional neighbors know us and our contributions;
- Infill Development & Outward Expansion – Development fills in the gaps and expansion occurs with purpose;
- Economic Vitality – Our economy is diverse and balanced and enhances quality of life
- Community Identify – City core, heritage, and well known neighborhoods;
- Rural Areas – Protecting our farming heritage and rural life;
- Open Space and Resource Management –Outdoor recreation is right outside our door;
- Multimodal and Active Transportation – Moving around anywhere, any way;
- Sustainable and Healthy Community – Clean, green practices and healthy living; and
- Coordinated Services, Technology, and Infrastructure – Service for the needs of all residents.

The General Plan is organized in chapters around the key themes and supporting principles, reflecting the local issues and context and minimizing redundancies between the State-mandated elements.

Policies updated through the General Plan reflect the updated Vision and the supporting principles. Specifically, new policies have been prepared to guide infill development and address the process for considering annexation applications, including the development of concept plans for each of the City's four Study Areas beyond the City limits but within the General Plan Planning Area. Policies have also been added to address vehicle miles traveled and improve the multimodal transportation network of the City, including roadways that are designed for a range of users and improved transit services.

The revisions to the General Plan Land Plan, including the revisions to the land use descriptions, provide for improved consistency with the goals and policies of the General Plan. A range of housing types and densities have been identified to accomplish the City's housing objectives as identified in the Regional Housing Needs Allocation, and opportunities for establishment of a Major Employment Center have been identified. The General Plan also establishes new mixed use designations that provide opportunities for development types that support transit and provide additional housing, retail, and employment environments that are important to the community.

The General Plan also establishes new Community Plans for the Rural Area and the Eastern Elk Grove Area, recognizing the unique characteristics of each and establishing goal and policies that support their form and characteristics, including development typology, infrastructure requirements (to the extent infrastructure is required) and density.

PASSED AND ADOPTED by the City Council of the City of Elk Grove this 27th day of February 2019.

STEVE LY, MAYOR of the
CITY OF ELK GROVE

ATTEST:

APPROVED AS TO FORM:

JASON LINDGREN, CITY CLERK

JONATHAN P. HOBBS
CITY ATTORNEY

Exhibit A
Draft General Plan (Dated July 2018)

Due to length this material was provided under separate cover. Copies may be viewed at the City Clerk's Office or on the City's website at www.elkgrovecity.org/generalplan.

EXHIBIT B

General Plan Update - Errata Matrix
Current as of: February 22, 2019

This table lists the proposed revisions to the draft General Plan. Where applicable, changes are listed with track changes where underline indicates new text and ~~strikeout~~ indicates deleted text. Updated images or maps, as referenced, are provided at the end of this document.

Revision #	Page(s)	Revision	Notes	Source
Document-wide Revisions				
1	All	Update the footer to state "Adopted DATE" where "DATE" is the date of City Council adoption.		City revisions
Table of Contents				
2	All	All page numbers are updated as appropriate to reflect any repagination from these edits.		City revisions
3	III	Remove duplicate listing for Figures 3-1 and 3-2.		City revisions
4	IV	Retitle "Figure SRA-1: Sheldon/Rural Area Land Use Map" to "Figure RA-1: Rural Area Land Use Map"		Comments 294, 310
5	IX	Retitle "Sheldon/Rural Area" to "Rural Area"		Comments 294, 310
Chapter 1: Introduction				
6	1-3	<i>The Key City Facts box in the margin is updated to list the correct area of the City as follows:</i> Area of the City: 34.8 square miles (2003) 36.6 <u>42.24</u> square miles (2015)		City revisions
7	1-4	<i>Correct the reference to the City size in the first paragraph of the Regional Location section to read "The City of Elk Grove covers approximately 36.6 <u>42.24</u> square miles in southern Sacramento County."</i>		City revisions
8	1-9	Correct the formatting of the fourth bullet in the middle of the page to remove the bold . Content to remain.		City revisions
9	1-10	Figure 1-2 updated (General Plan Planning Area) to include the Bilby Ridge Sphere of Influence	This Sphere of Influence Amendment was approved by LAFCo on August 1, 2018	City revision
10	1-17 and 1-18	Update the page contents to reflect any corrections to the illustrated pages otherwise listed in this errata.		City revisions
Chapter 2: Vision				
11	2-4	Photo in Supporting Principles section (picture is in City of Galt) updated and replaced with a picture from Elk Grove.		Comment 5
12	2-4 to 2-6	Revisions to supporting principles as follows: <i>Regional Goals & Influence (first paragraph):</i> Elk Grove occupies a prominent place in the regional dialogue. The City's identity and brand are clear in the minds of its neighbors, <u>and our unique sense of place makes our City an appealing destination to live, work and visit.</u> Our contributions to the region continue to strengthen that		Comments 6, 7, 8

identity and include recreational opportunities, higher education, job centers, and quality neighborhoods. City officials engage with other cities, Sacramento County, and other partners to plan and build for an ever more dynamic region. The City’s employment potential within the regional economy is fulfilled.

Infill Development & Outward Expansion (second paragraph):

Infill development is consistently executed with programs that address impacts and encourage innovative building solutions. A creative growth management strategy allows expansion to occur when economic need, community vision, and regional goals align. There is a strong system in place to guarantee that as the community accommodates new neighbors and new jobs, it continues to maintain and improve facilities and services, such as schools, roads, and parks. Our development review process works to ensure that new development is compatible with surrounding neighborhoods and to preserve the character of our community.

Community Identity (second paragraph):

Old Town Elk Grove continues to protect and showcase our heritage for the enjoyment of residents and visitors alike. This unique district is a source of pride and identity for Elk Grove residents.

Open Space & Resource Management:

Our parks and trails are high quality and highly valued, providing regional destinations for outdoor recreation and active living. We continue to enhance and maintain our recreational open spaces so that they are safe, connected, and accessible to all. Our trails connect easily to other trails and parks in the region, and community gardens are a source of local food and local involvement.

Multimodal & Active Transportation:

Our residents, workers, and visitors need to move about efficiently, and have a variety of ways to do so. Connected transportation networks, regional coordination, and public and active transportation options are priorities for our community. Connected and mobile community members have the ability to travel within the City and to other places in the region by a variety of methods, with seamless transitions between modes and regions. Our community has roadways in place that allow for efficient movement and safe travel spaces for all modes of travel. The infrastructure and facilities for pedestrians, bicyclists, and transit users are clean, safe, and well maintained, and walkways and bike lanes are continuous and complete with

convenient connections to local and regional transit. Amenities such as bus shelters make riding transit comfortable and convenient in our community. We are committed to extending transit service with good frequency and route coverage to future expansion areas of the City.

Sustainable & Healthy Community:
 Sustainable practices are at the forefront of environmental concerns in Elk Grove. Organizations, businesses, and residents desire a city that is adaptive to and resilient against climate change, is a leader in conservation, and embraces innovations in green technologies. The City layout and land uses promote healthy living, with healthy grocery options and destinations nearby that people can get to by walking and biking. The City’s residents and businesses recognize the importance of responsible resource use, and they work together to conserve and use water and energy to their full potential. The City follows good, innovative design principles for urban spaces and infrastructure to enhance sustainability and resiliency.

Chapter 3: Planning Framework

13	3-4	Second sentence of last paragraph revised to read, “There will be older commercial corridors where reinvestment can benefit and enhance the community, <u>including but not limited to: Elk Grove-Florin Road between Bond Road and Elk Grove High School, and Elk Grove Boulevard between SR-99 and Old Town.</u> ”	Comment 17
14	3-10	Reference to “curbs and gutters” added to the paragraphs referring to the Rural Area under Rural Area Preservation.	Comment 9
14A	3-11	<i>Revise the paragraph describing Floor Area Ratio to read as follows:</i> The density of residential land use is generally measured in terms of the number of dwelling units per acre (du/ac) of land. The intensity of nonresidential (i.e., commercial or industrial) land use, as well as that of mixed land use areas, is generally measured in terms of floor area ratio (FAR), which describes the number of square feet of building on a site relative to the site’s land area. FAR calculates the gross floor area of a building divided by the total net area of the site, expressed as a ratio. <u>FAR generally excludes roof-top utility and surface or structured parking; see EGMC Title 23 for specifics on how to calculate FAR.</u> The higher the FAR, the more intense the building may be on a site. For example, a site with 10,000 square feet of net land area would have a different FAR depending on the size of the building placed on the site, as shown in Figure 3-3.	City revisions
15	3-19	<i>Add a new note “c”, as provided below, to the Rural Residential listing:</i>	City revisions

<p><u>c. Lots smaller than 2 gross acres within the Rural Area Community Plan that existed as legal lots as of November 19, 2003 are considered consistent with the Rural Residential General Plan designation.</u></p>					
16	3-21 and 3-22	<p><i>Changes to Figure 3-4: Land Use Diagram:</i> Add the Bilby Ridge Sphere of Influence</p>	<p>This Sphere of Influence Amendment was approved by LAFCo on August 1, 2018</p>	City revisions	
	A			City revisions	
	B			SEC of Elk Grove Blvd and Big Horn (APNs 132-2110-004) changed to VCMU	City revisions
	C			Railroad Street (APNs 132-0050-043, -052, -082, -035, 132-0470-077) changed to VCMU	City revisions
	D			Sheldon Farms North – Updated consistent with pending development application (EG-18-019)	City revisions
	E			Sheldon Farms South – Updated consistent with pending development application (EG-18-024)	City revisions
16 (cont.)	F	8800 and 8810 Orton Drive changed from Employment Center to LDR	Mapping issue with boundary of Employment Center to the south. These two properties are developed with single family uses.	City revisions	
	G	Emily Street south of Elk Way, APN 116-0144-002 – Changed to Community Commercial	Mapping issue with boundary of adjoining Community Commercial in adjoining shopping center. By ownership this lot is part of the shopping center and should be included in CC.	City revisions	
	H	NEC Sheldon and Waterman – APNs 121-0180-065 and -060 – corrected to Rural Residential	Correct mapping to remove Parks and Open Space designation in power line corridor area.	City revisions	
	I	Update the land plan in the Southeast Policy Area to reflect amendments made in 2017 and 2018	Affects the Bruceville Meadows site, Mendes property, and the Poppy Keys Southwest property.	City revisions	
	J	Updated the Phase III area of Laguna Ridge to reflect amendments made in spring 2018	Affects the Treasure and Tuscan Ridge South properties	City revisions	
	K	Update the land plan in the East Elk Grove area to align with the proposed zoning. Sites zoned RD-7 are re-designated Low Density Residential.		City revisions	
	L	Re-designate the following APNs from Estate Residential to Rural Residential (all along Millpond Court): 127-0030-032, -033, and -038 through -045		City revisions	
	M	Update the SWC of East Stockton Blvd and Elk Grove Boulevard to list properties as follows: APN 125-0030-014: PS APNs 125-0030-010, -041, -042, -043, and -044: Regional Commercial Constrain designation boundaries to properties and remove any overlap with public rights-of-	Removes erroneous polygons that sit over public rights-of-way	City revisions	

General Plan Update – Errata Matrix
 Current as of February 22, 2019

	way (e.g., highway ramps).		
N	Update the area bounded by Geneva Point Drive, Aubery Drive, and Power Inn Road such that single family sites are designated Low Density Residential and the apartment site is designated High Density Residential.	Corrects mapping relative to the old Calvine Road/Highway 99 Special Planning Area	City revisions
O	Re-designate APN 126-0260-008 as Rural Residential	Based upon property owner feedback in the rezone process.	Property owner feedback
P	Re-designated APN 127-0110-012 from Rural Residential to Community Commercial	Reflects commercial use of the site.	City revisions
Q	Changed APN 116-0320-024, 116-0320-040 through 116-0320-055 from VCMU to Regional Commercial	As directed at the January 3, 2019 Commission meeting	City revision

17	3-23	Correct the acres listing in Table 3-2 as follows:	Acres were listed for net of existing public rights-of-way and should be listed as gross acres. This revision does not change the calculation of development capacity, which is based upon net acres.	City revisions																																																						
<table border="1"> <thead> <tr> <th></th> <th>Acres</th> <th>Dwelling units</th> <th>Population¹</th> <th>Employment (Jobs)</th> <th>Jobs/Housing Ratio</th> </tr> </thead> <tbody> <tr> <td>Existing Development Total²</td> <td>31,283 31,449</td> <td>53,829</td> <td>171,059</td> <td>45,463</td> <td>0.84</td> </tr> <tr> <td>General Plan Total</td> <td>31,449 34,956</td> <td>102,865</td> <td>332,254</td> <td>122,155</td> <td>1.21</td> </tr> <tr> <td>City Limits Subtotal</td> <td>23,441 26,946</td> <td>72,262</td> <td>233,406</td> <td>81,784</td> <td></td> </tr> <tr> <td>Study Area Subtotal</td> <td>8,008</td> <td>30,603</td> <td>98,848</td> <td>40,371</td> <td></td> </tr> <tr> <td>North Study Area</td> <td>646</td> <td>323</td> <td>1,043</td> <td>0</td> <td></td> </tr> <tr> <td>East Study Area</td> <td>1,772</td> <td>4,806</td> <td>15,523</td> <td>3,875</td> <td></td> </tr> <tr> <td>South Study Area</td> <td>3,675</td> <td>16,250</td> <td>52,488</td> <td>30,367</td> <td></td> </tr> <tr> <td>West Study Area</td> <td>1,915</td> <td>9,224</td> <td>29,794</td> <td>6,129</td> <td></td> </tr> </tbody> </table> <p>Table Notes: Numbers may not sum due to rounding</p> <ol style="list-style-type: none"> Based on 3.23 persons per household, <u>average</u>. Existing development represented 2017 population and dwelling information and derived from 2013 jobs data (the most current year available at time of writing the General Plan). 						Acres	Dwelling units	Population ¹	Employment (Jobs)	Jobs/Housing Ratio	Existing Development Total ²	31,283 31,449	53,829	171,059	45,463	0.84	General Plan Total	31,449 34,956	102,865	332,254	122,155	1.21	City Limits Subtotal	23,441 26,946	72,262	233,406	81,784		Study Area Subtotal	8,008	30,603	98,848	40,371		North Study Area	646	323	1,043	0		East Study Area	1,772	4,806	15,523	3,875		South Study Area	3,675	16,250	52,488	30,367		West Study Area	1,915	9,224	29,794	6,129	
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18	3-30	Address inconsistent line formatting between paragraphs on this page.	Comment 23																																																							
19	3-32 and 3-35	<p>Alignment of Capital SouthEast Connector added to Figure 3-6 (Transportation Network Diagram) and Figure 3-7 (Roadway Classifications). The addition adds the label as a highlight along the route and does not modify the roadway classifications or roadway sizing otherwise depicted in the figures.</p> <p>Revise designation of Bruceville Road from Elk Grove Boulevard to Laguna Boulevard to 6-lanes from 4-lanes.</p>	Comment 11																																																							

20	3-34	Location of photograph referenced as Watershore Parkway corrected to Whitelock Parkway.	Comment 24
21	3-39	<p><i>The section Habitat Conservation is revised to read as follows:</i></p> <p>Although no natural open spaces are located within the City, its urban parks and waterways provide habitat. There are also several notable open spaces in adjacent jurisdictions, such as the Stone Lakes National Wildlife Refuge and the Cosumnes River Preserve. Access to nearby open spaces for recreation and enjoyment of nature is important to Elk Grove residents. Habitat conservation for ecological diversity is also a valuable resource and a priority of the region and the State. The City recognizes that future development in Elk Grove could have impacts on these resources, since an increase in the local population would result in higher and more intensive use of nearby existing habitats of importance. Several plant and animal species present in the Planning Area are listed as threatened or endangered at the State and/or national level, including Swainson’s hawk and the valley elderberry longhorn beetle.</p> <p>Habitat conservation and agricultural protection is also covered on the regional level in great detail by the <u>adopted South Sacramento Habitat Conservation Plan (SSHCP)</u>, a regional approach to addressing issues related to urban development, habitat conservation, and agricultural protection <u>in southern Sacramento County and within the jurisdictions of Sacramento County, the City of Galt, and the City of Rancho Cordova</u>. The SSHCP <u>will consolidate</u> environmental efforts to protect and enhance wetlands (primarily vernal pools) and upland habitats to provide ecologically viable conservation areas. It <u>will</u> also <u>minimize</u> regulatory hurdles and <u>streamline</u> the permitting process for development projects. <u>While the SSHCP does not apply to areas within the existing City Limits, the North, East, and portions of the West Study Area may utilize it to streamline their permitting and mitigation. Nothing in the SSHCP compels projects to utilize the SSHCP as the mitigation program.</u></p>	Comment 25
22	3-39	<p><i>Definitions of the terms “feathering” and “buffering” added in a sidebar as follows:</i></p> <p><u>“Feathering” refers to the staged or staggered reduction in density or intensity over a given area, transitioning from a more dense or intense area to a less dense or intense area. This land planning technique may be used to smooth or blur the edge between two land use areas (e.g., urban and rural) in order to address compatibility.</u></p> <p><u>“Buffering” is the establishment of an area with limited development potential, such as an open space area, easement, or other land use restriction, or some form of landscaped area, to address a compatibility concern between two land uses.</u></p>	Comment 26

23	3-43 and 3-44	Figure 3-8 is updated to incorporate the updated 200-year floodplain data. The legend is also updated, in part, to read as follows: FEMA 100-year Flood Zones 100-year Floodplain (<u>FEMA-mapped areas; see City of locally-mapped areas</u>) 200-year Floodplain (<u>See Chapter 8</u>)	City revisions
Chapter 4: Urban and Rural Development			
24	4-7	Revise Figure 4-1 by changing the purple block along the east side of Elk Grove-Florin Road just south of Sheldon Road from New Growth Area to Infill Area.	City revisions
25	4-8	Under <i>Neighborhoods and Community Character</i> , “farm-style homes” changed to “ranch-style homes.”	Comment 71
26	4-8	<i>The second paragraph under Neighborhoods and Community Character is revised to read: “...The area Rural Area lacks the infrastructure typically found in an urban or suburban community, such as sidewalks, street lighting, curb and gutters, or public water and sewer.”</i>	Comment 52
27	4-8	The following new third paragraph is added to the <i>Neighborhoods and Community Character</i> section to explain that the Transition Areas shown in Figure 4-1 (Potential Activity and Infill Areas in Elk Grove): The areas identified in Figure 4-1 as Transition Areas are places characterized by a transition from the more urban areas to the Rural Area on the east side of the City. These areas may be designated as Estate Residential or Open Space to transition from the large lots in the Rural Area to the smaller Low-Density Residential lots. The primary purpose of Transition Areas is to buffer the Rural Area from higher-density development in the immediate vicinity.	Comment 69
28	4-10	Legend of Figure 4-10 updated to read as follows: “Sheldon/Rural Area Community Plan”	Comment 92
29	4-11	<i>The second paragraph is modified as follows:</i> SPAs are a zoning tool used to regulate property in areas throughout the City that have unique environmental, historic, architectural, or other features which require special conditions not provided through the application of standard zoning regulations. They may be used are designed to protect certain resources in the City from incompatible land uses and to preserve and enhance areas with unique social, architectural, or environmental characteristics that require special considerations and are not adequately addressed by zoning districts. SPAs may establish development standards for minimum lot area, building setbacks, lot width and depth, and building height that differ slightly from Citywide development standards. In general, however, the intent of SPAs is to allow developers to receive relief from the development	Comment 57

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		standards and offer greater flexibility than the existing zoning. Developers are encouraged to incorporate a variety of housing designs and densities for these areas, such as mixed-use commercial/residential and garden homes. However, developers are required to all new development shall maintain minimum densities based on the established zoning <u>General Plan designation(s)</u> for the area. The SPAs and specific plans, in many cases, relax the development standards that apply in other areas of the City and may allow for a greater variety of design treatments and densities.	
30	4-11	"Sheldon/Rural Area Community Plan" changed to "Elk Grove Rural Area Community Plan."	Comment 92
31	4-12	<i>Under Job Creation, last sentence of the first paragraph changed to read as follows:</i> "This in turn would reduce commute times for some residents who could choose to work locally and therefore have more time to enjoy nearby amenities and entertainment."	Comment 74
32	4-12	<i>The first paragraph under Jobs and Housing Needs is revised as follows:</i> An appropriate balance between jobs and housing can enhance the quality of life and improve environmental conditions. However, because the City is located at the edge of the Sacramento region, adding new jobs in Elk Grove without also adding new housing could be problematic <u>as it could cause new commute patterns where employees who live elsewhere in the region are attracted towards Elk Grove for employment opportunities. Further, if</u> if the jobs added <u>within the City</u> are not matched to the skill set of employees who reside in the City, workers will continue to commute to jobs in outside Elk Grove from other locations throughout the region despite these job gains . Additional housing in Elk Grove will allow greater flexibility for workers who choose to live closer to their places of employment. Conditions that support a variety of housing types for all income levels will allow Elk Grove to continue to serve an important role as a residential community.	Comment 76
33	4-14	<i>Revise Policy LU-1-3 to read as follows:</i> Policy LU-1-3: Multifamily housing development should be located according to the general criteria as identified in <u>Policy H-1-3</u> , the Community and Resource Protection chapter (see Chapter 7).	City revisions
34	4-15	<i>Revise Policy LU-1-8 to read as follows:</i> Policy LU-1-8: Seek to designate sufficient land in all employment generating categories to provide a minimum 1:1 corresponding ratio between <u>opportunities for</u> Elk Grove's working population and jobs in categories matching resident's employment level.	City revisions

35	4-15	<p><i>Add a new Policy LU-1-10 under Policies: Employment Land Uses that reads as follows:</i></p> <p><u>Policy LU-1-10: The City discourages changes in the land use map that reduce or eliminate properties designated for employment uses.</u></p>	City revisions
36	4-16	<p>Add the following cross-reference in the margin against Policy LU-2-1 that reads “Also see policies in the Mobility Chapter under MOB-5 relative to transit corridors.”</p>	City revisions
37	4-18	<p>Revise the section under Policies: Study Area Organizing Principles as follows:</p> <p>Policies: Study Area Organizing Principles Policy LU-3-1: Ensure that future development in the Study Areas is consistent with the City’s Vision and Supporting Principles by implementing the Study Area organizing principles <u>provided herein, as follows:</u></p> <p>Study Area Organizing Principles <u>The City envisions that future development within the Study Areas will occur within a broader organizing framework of land use principles (referred to as organizing principles). Development shall occur within one or more of the following three districts, which are described in more detail on the following pages. The following organizing principles describe general standards and requirements for the organization and distribution of future land uses in the Study Areas and the desired relationship between them. These principles describe planning policies that apply across all Study Areas.</u></p> <p><u>Land uses in the Study Areas are divided into the following three districts:</u></p> <ol style="list-style-type: none"> <u>1. Activity District, which focuses on higher densities and intensities of retail, services, employment, and residential uses.</u> <u>2. Residential Neighborhood District, where residential development, with neighborhood-serving retail and parks and schools, occurs.</u> <u>3. Open Space/Conservation District, which includes large urban parks, open spaces, and agriculture-related uses.</u> <p><u>Figure 4-4 Conceptual Illustration of General Siting Criteria illustrates how these districts and other community components (including parks and roadways) shall be generally organized. This graphic is included primarily for illustrative purposes and does not reflect any specific development proposal. As future land planning and development entitlements occur, these districts, as they are found in each Study Area, will be refined into the specific land use</u></p>	City revisions

		designations of this General Plan. Development in each district shall comply with the general standards below, as well as with specific Land Use Programs unique to each Study Area.									
38	4-19	Existing footnotes 1 and 2 are deleted in both text and from the Low Density Residential and Parks listings. A new Footnote 1 is added, which reads: “1. Parks, schools, and other supportive land uses are allowed in the various districts and land use designations as provided in the respective study area development patterns.”	Comments 50, 51								
39	4-21	Additional bullet point added at end of Policy LU-3-5 stating: “Consistent with the Park Design Principles adopted by the Cosumnes Community Services District and the City, local and neighborhood parks shall be located within residential areas and not along arterial roads. Community parks may be located on arterials.”	Comment 35								
40	4-27	“Sheldon/Rural Area Community Plan” changed to “Elk Grove Rural Area Community Plan.”	Comment 92								
41		<i>This revision was removed by the Planning Commission at the hearing. No change is made.</i>									
42	4-27	Table 4-1 updated as follows: <table border="1" data-bbox="424 740 1327 883"> <thead> <tr> <th>Land Use District</th> <th>Designations Allowed in District</th> <th colspan="2">Desired Land Use Range (Gross Acreage Basis)^{1,2}</th> </tr> </thead> <tbody> <tr> <td>Residential Neighborhood District</td> <td>Rural Residential (RR)</td> <td>100%</td> <td><u>646 acres</u></td> </tr> </tbody> </table> <p>Note: 1. <u>Land use designations shall occur within the percentage range as listed.</u> 2. <u>Acreage range provided is based upon the gross acreage of the study area and the percent range listed. Where a discrepancy occurs between the two, the percent shall control.</u></p>	Land Use District	Designations Allowed in District	Desired Land Use Range (Gross Acreage Basis) ^{1,2}		Residential Neighborhood District	Rural Residential (RR)	100%	<u>646 acres</u>	Comment 42
Land Use District	Designations Allowed in District	Desired Land Use Range (Gross Acreage Basis) ^{1,2}									
Residential Neighborhood District	Rural Residential (RR)	100%	<u>646 acres</u>								
43	4-29	<i>The first paragraph is modified to read as follows:</i> The East Study Area and the location of Land Use Districts within it are shown in Figure 4-6. The planning objective for the East Study Area is to create <u>a mix of employment activities in the southwest area that transition to residential neighborhoods towards the northeast. Employment uses will function as an extension of an employment activity center envisioned for SEPA that meets SACOG’s MTP/SCS standards for a Major Employment Center adjoining industrial development to the north/northwest.</u> The employment uses envisioned for the East Study Area will focus on industrial, office, and regional retail uses and include a regional recreation and sports center.	City revisions								

44	4-29	Figure 4-6 (East Study Area Land Use Diagram) corrected to remove the overlap between the Residential Neighborhood District and the Activity District	Comment 41																																											
45	4-30	Table 4-2 updated as follows:	Comment 42																																											
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District		to meet resource conservation standards and/or provide floodplain buffer	
	Public Services (PS)	1%-3% or as needed to support land uses	<u>15-55 acres</u>

Note:

1. Land use designations shall occur within the percentage range as listed. For those land uses with a percent range listed “or as needed”, if an amount more than the range is required in order to achieve the necessary amount of parks or other public services necessary to serve the development, or increased higher density housing to comply with the RHNA, the other land use percentages shall be adjusted, as determined by the City Council, in order to achieve the development pattern for this study area.
2. Acreage range provided is based upon the gross acreage of the study area and the percent range listed. Where a discrepancy occurs between the two, the percent shall control.

46

4-32

Table 4-3 updated as follows (note formatting correction in table):

Comment 42

Land Use District	Designations Allowed in District	Desired Land Use Range (Gross Acreage Basis) ^{1,2}	
Activity District	Community Commercial (CC)	3%-8%	<u>110-295 acres</u>
	Regional Commercial (RC)		
	Employment Center (EC)	5%-10%	<u>180-370 acres</u>
	Light Industrial/Flex (LI/FX)	3%-8%	<u>110-295 acres</u>
	Light Industrial (LI)		
	Heavy Industrial (HI)		
	Residential Mixed Use (RMU)	1%-5%	<u>35-185 acres</u>
	Village Center Mixed Use (VCMU)		

		High Density Residential (HDR)	1%-3% or as needed to meet RHNA	<u>35-110 acres</u>
		Public Services (PS)	1%-3% or as needed to support land uses	<u>35-110 acres</u>
	Residential Neighborhood District	Community Commercial (CC)	1%-5%	<u>35-185 acres</u>
		Rural Residential (RR)	45%-50%	<u>1,650 – 1,840 acres</u>
		Estate Residential (ER)		
		Low Density Residential (LDR)	8%-13% or as needed to meet RHNA	<u>295-480 acres</u>
		Medium Density Residential (MDR)		
		High Density Residential (HDR)		
		Residential Mixed Use(RMU)	5%-10% or as needed to support land uses	<u>185-370 acres</u>
	Park and Open Space (P/OS)			
	Public Services (PS)	1%-3% or as needed to support land uses	<u>35-110 acres</u>	
	Open Space/Conservation District	Resource Management and Conservation (RMC)	3%-8% or as needed to meet resource conservation standards and/or provide floodplain buffer	<u>110-295 acres</u>
		Public Services (PS)	1%-3% or as needed to support land	<u>35-110 acres</u>

		uses	
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- Note:**
1. Land use designations shall occur within the percentage range as listed. For those land uses with a percent range listed “or as needed”, if an amount more than the range is required in order to achieve the necessary amount of parks or other public services necessary to serve the development, or increased higher density housing to comply with the RHNA, the other land use percentages shall be adjusted, as determined by the City Council, in order to achieve the development pattern for this study area.
 2. Acreage range provided is based upon the gross acreage of the study area and the percent range listed. Where a discrepancy occurs between the two, the percent shall control.

47 4-34

Table 4-4 updated as follows:

Comment 42

Land Use District	Designations Allowed in District	Desired Land Use Range (Gross Acreage Basis) ^{4,2}	
Activity District	Community Commercial (CC)	1%-3%	<u>20-60 acres</u>
	Employment Center (EC)	3%-8%	<u>58-155 acres</u>
	High Density Residential (HDR)	1%-3% or as needed to meet RHNA	<u>20-60 acres</u>
	Public Services (PS)	1%-3% or as needed to support land uses	<u>20-60 acres</u>
Residential Neighborhood District	Community Commercial (CC)	1%-3%	<u>20-60 acres</u>
	Rural Residential (ER)	50%-55%	<u>950-1,050 acres</u>
	Estate Residential (ER)		
	Low Density Residential (LDR)	15%-20% or as needed to meet RHNA	<u>285-385 acres</u>
	Medium Density Residential (MDR)		
	High Density Residential (HDR)	1%-5% or as needed	<u>20-95 acres</u>
Park and Open Space (P/OS)			

			to support land uses	
Open Space/Conservation District	Resource Management and Conservation (RMC)		3%-8% or as needed to meet resource conservation standards and/or provide floodplain buffer	<u>60-155 acres</u>
	Public Services (PS)		1%-3% or as needed to support land uses	<u>20-60 acres</u>
<p>Note:</p> <ol style="list-style-type: none"> <u>Land use designations shall occur within the percentage range as listed. For those land uses with a percent range listed “or as needed”, if an amount more than the range is required in order to achieve the necessary amount of parks or other public services necessary to serve the development, or increased higher density housing to comply with the RHNA, the other land use percentages shall be adjusted, as determined by the City Council, in order to achieve the development pattern for this study area.</u> <u>Acreage range provided is based upon the gross acreage of the study area and the percent range listed. Where a discrepancy occurs between the two, the percent shall control.</u> 				
48	4-36	<p><i>Additional criterion for proposed annexations added to end of Policy LU-3-26:</i></p> <p>Criteria 6. <u>The annexation proposal identifies the source of future water supply for areas proposed for new development, in compliance with the Sustainable Groundwater Management Act.</u></p>		Comment 89

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49	4-41	<p><i>Revise Standard LU-5-3.b to read:</i></p> <p>Standard LU-5-3.b: Require that existing overhead utility facilities be undergrounded as a condition of project approval. This shall include electrical service lines under 69kV. Electrical service lines of 69kV and higher are encouraged to be undergrounded.</p>	City revisions
50	4-41	<i>Add a cross reference in the margin next to LU-5-3.b that read “Also see Policy CIF-2-1”</i>	City revisions
51	4-47	<p><i>Revise Policy H-1-3 to read as follows:</i></p> <p>Policy H-1-3: Promote development where affordable housing is located in close proximity to services, shopping, and public transportation.</p> <p><u>Standard H-1-3.a: Utilize the following non-binding guidelines in the analysis process of identifying opportunity locations for new multifamily housing:</u></p> <ol style="list-style-type: none"> <u>1. Proximity to public transit or bus service.</u> <u>2. Proximity to commercial and social services.</u> <u>3. Parcel size and configuration that enhances the feasibility of development.</u> <u>4. Lack of physical constraints (e.g., noise, wetlands).</u> <u>5. Provision for a variety of housing types and affordable housing opportunities.</u> <u>6. An appropriate size to provide for on-site management.</u> <u>7. Integration into and compatibility with surrounding development.</u> <u>8. Proximity to other multifamily development.</u> <p><u>The City may also consider other criteria, as it deems appropriate, in order to determine the feasibility and potential constraints of new multifamily development.</u></p>	City revisions
Chapter 5: Economy and the Region			
52	5-3	In <i>Overview</i> section “it is a bedroom community...” changed to “it is currently a bedroom community...”	Comment 109
53	5-3 to 5-6	Additional photos added of office and industrial development in Elk Grove.	Comments 98 and 106
54	5-10	Correct the formatting error with regard to Policies ED-1-3 through ED-1-5.	City revisions
55	5-11	<p><i>Policy ED-3-2 revised to read as follows:</i></p> <p>Policy ED-3-2: Support existing and prospective small and home-based businesses and enable them to launch and grow into larger <u>thriving, successful</u> companies and employers.</p>	Comments 111, 113
56	5.13	Update Figure 5-2 <i>Desired Future MTP/SCS Employment Centers</i> to use the correct version of Figure 3.5/Figure 9.1 from the 2016 MTP/SCS.	City revisions

57	5-15	Correct the formatting error with regard to Policy RC-2-3.	City revisions
58	5-15	<i>Policy RC-2-4 revised to read as follows:</i> Policy RC-2-4: Improve interagency coordination during the development review process for major commercial developments, to provide <u>faster</u> , more streamlined, cost-effective, and predictable review and approval processes, thereby making it easier for large businesses to locate or expand in Elk Grove.	Comments 108, 112
Chapter 6: Mobility			
59	6-3	<i>Correct the formatting in the second paragraph to read as follows:</i> Elk Grove’s mobility strategy is informed by each of the following factors that affect how people and goods <u>goods</u> move around:	City revisions
60	6-3	<i>Under “Land Use Distribution,” bullet point first sentence, changed to read as follows:</i> • Land use distribution: The ease <u>of use</u> , cost, and functionality of the mobility system is driven by the distribution of current and planned land uses. ...	Comment 131
61	6-7	<i>Second paragraph of Policy MOB-1-1 revised to clarify that the Vehicle Miles Traveled (VMT) limits discussed in this chapter are daily limits, as follows:</i> Projects that do not achieve the <u>daily VMT</u> limits outlined below shall be subject to all feasible mitigation measures necessary to reduce the VMT for, or induced by, the project to the applicable limits.	Comment 132
62	6-10	<i>Text in sidebar revised as follows:</i> Transportation projects that are exempt from these requirements because they are not likely to lead to a substantial or measurable increase in VMT are listed in the Transportation Impact <u>Assessment Analysis</u> Guidelines.	Comment 117
63	6-14	<i>New Figure 6-1, Aviation Facilities around the City, is added and the paragraph on this page is revised as follows:</i> Although no airports exist within the City limits as of 2017, a general aviation airport, Franklin Field, is located within 3 miles of the Planning Area. This airport affects land uses within the City and provides an opportunity for general aviation uses near the city <u>City</u> . Additionally, a number of larger regional and international airports, including the Sacramento International Airport, Sacramento Executive Airport, and Mather Airport, are outside the Planning Area but produce frequent overflights of approaches and departures. <u>Figure 6-1 identifies the location of these</u>	Comment 120

<u>aviation facilities and their proximity to the City.</u>				
64	6-15	<p><i>Modify as follows:</i></p> <p>The City is required by the Complete Streets Act to plan for a balanced, multimodal transportation network that meets the needs of all users (e.g., motorists, pedestrians, bicyclists, children, individuals with disabilities, seniors, movers of commercial goods, and users of public transportation).¹ The City must identify how streets, roads, and highways will accommodate the needs of all users for safe and convenient travel in a manner that is suitable to the surrounding rural, suburban, and/or urban context. <u>Therefore, the policies contained herein shall apply to all types of streets in the City, including both public and private streets.</u></p>		Comment 121
65	6-15	<p>Standard MOB-3-2.a revised to reflect new proposed requirements in the draft Climate Action Plan:</p> <p>Standard MOB-3-2.a: Require new commercial development for projects equal to and greater than 100,000 square feet to provide an electric vehicle charging station and new development to install conduits residential development to pre-wire for plug-in <u>future installation of electric vehicles charging equipment.</u></p>		Comment 122
66	6-18	Policy MOB-4-1 revised to read "promote <u>context-sensitive</u> pedestrian and bicycle movement...."		Comment 133
67	6-20	<p><i>Revise Policy MOB-5-1 to read as follows:</i></p> <p>Policy MOB-5-1: Support a pattern of land uses and development projects that are conducive to the provision of a robust transit service. <u>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.</u></p>	Based upon discussions between City staff and the Sacramento Area Council of Governments (SACOG)	City revisions
68	6-21	<p><i>Add a new Policy MOB-5-6 under Policies, Transit-Supportive Land Use Planning, as follows; renumber successive policies:</i></p> <p>Policy MOB-5-6: The City shall work to incorporate transit facilities into new private <u>development and City project designs including incorporation of transit infrastructure (for example, electricity, fiber-optic cable), alignments for transit route extensions, new station locations, bus stops, and transit patron waiting</u></p>	Based upon discussions between City staff and the Sacramento Area Council of Governments (SACOG)	City revisions

<u>area amenities (for example, benches, real-time traveler information screens).</u>				
69	6-21	<p><i>Add a new Policy MOB-5-12 under Policies, Effective Transit Operation, as follows (reflects new numbering from Revision 68):</i></p> <p><u>Policy MOB-5-12: The City will work towards the enhancement and improvement of transit service with the objective of creating major transit corridors with frequent services (e.g., less than 30-minute headways) and street segments where transit is prioritized.</u></p>	Based upon discussions between City staff and the Sacramento Area Council of Governments (SACOG)	City revisions
70	6-21	<p><i>Add a new Policy MOB-5-13 under Policies, Effective Transit Operation, as follows (reflects new numbering from Revisions 68 and 69):</i></p> <p><u>Policy MOB-5-13: Consider the implementation of traffic signal priority, queue jumps, and exclusive transit lanes to reduce transit passenger delay and improve transit speed, reliability, and operating efficiency.</u></p>	Based upon discussions between City staff and the Sacramento Area Council of Governments (SACOG)	City revisions
71	6-23	<p><i>Revise Standard MOB-7-1.a to read as follows:</i></p> <p>Standard MOB-7-1.a: Generally, new roadway construction or road widening shall be completed to the ultimate width as provided in this General Plan and shall also provide required bicycle and pedestrian improvements and paths. However, phased improvements may be allowed based upon the timing of development and facility demand as determined by the City Engineer <u>or as otherwise provided in this General Plan or an applicable specific plan or other area plan.</u> Regardless, all roadways, pedestrian facilities, and bike routes or bikeways shall be constructed in logical and complete segments, connected from intersection to intersection, to provide safe and adequate access.</p>		City revisions
72	6-24	<p><i>Revise Policy MOB-7-4 as follows:</i></p> <p>Policy MOB-7-4: Require new development projects to provide funding or to construct roadway/intersection improvements to implement the City’s Transportation Network Diagram. The payment of adopted roadway development or similar fees, including the City Roadway Fee Program and the <u>voluntary</u> I-5 Subregional Fee, shall be considered compliant with the requirements of this policy with regard to those facilities included in the fee program, provided the City finds that the fee adequately funds required roadway and intersection improvements. If</p>		City revisions

		payment of adopted fees is used to achieve compliance with this policy, the City may also require the payment of additional fees if necessary to cover the fair share cost of facilities not included in the fee program.	
73	6-25	<p><i>Sidebar added with the following definitions:</i></p> <p>Road pricing refers to road user charges, such as road tolls, distance or time-based fees, congestion charges, and other charges to discourage use of certain travel modes.</p> <p>Parking pricing refers to charging a user fee for parking. These types of programs have been shown in other regions to help in increasing vehicle share/occupancy load for commutes or otherwise reducing driving. “</p>	Comment 134
Chapter 7: Community and Resource Protection			
74	Throughout Chapter 7	<p>Minor text revisions made throughout the chapter to emphasize the concept of livability and preservation of neighborhood character, and to emphasize the ways in which the various policies in the chapter support both preservation of both the natural environment and the built environment, as follows:</p> <p><i>p. 7-3, third paragraph:</i> This chapter of the General Plan establishes goals and policies to foster effective governance; and to maintain and preserve natural resources, parks and open spaces, trails and other recreational amenities, cultural and historic assets, and the character of neighborhoods and districts; <u>and to promote sustainability and livability.</u></p> <p><i>p. 7-11, second paragraph:</i> Historic resources exist in and around the City, including ranches, transportation features, burial sites and cemeteries, religious structures, cultural landscapes, and agricultural, residential, educational, commercial, industrial, and civic facilities. <u>These historic places lend a strong sense of character and place to Elk Grove, reinforcing our community’s roots and identity.</u></p> <p><i>p. 7-11, last paragraph:</i> Preservation of local historic resources, including the Old Town historic district, the agricultural heritage community of Sheldon, and the many individual State-designated landmarks in the community, contributes to the ongoing <u>community</u> legacy of Elk Grove <u>and helps to enhance community livability.</u></p> <p><i>p. 7-14, first paragraph:</i> “Parks and trails in Elk Grove are a significant point of pride for the community and contribute to the health and quality of life of residents and visitors. <u>Access and proximity to recreational facilities is one of the most important ways to foster a livable community.”</u></p> <p><i>p. 7-18, last paragraph:</i> In addition to their numerous environmental benefits, trees are a scenic resource and enhance Elk Grove’s visual character, and aesthetic quality, <u>and livability.</u></p>	Comment 167

		<p><i>p. 7-25, third paragraph:</i> Rooftop solar panels and other forms of small-scale renewable energy ultimately save money, reduce dependence on utility companies and large-scale power plants, and can help increase the value of a-buildings, and improve community livability through cleaner energy sources.</p> <p><i>p. 7-38, first paragraph:</i> The challenge is to incorporate the three components of sustainability “the environment, the economy, and the community” into City policies and actions. All three components work together as an integrated system to achieve a sustainable <u>and livable</u> community.</p>	
75	7-7	<p><i>Revised Policy GOV-1-3 to read as follows:</i></p> <p>Policy GOV-1-3: Require that major planning efforts, policies, or projects (<u>for example, General Plan updates, development of specific plans, large commercial development projects</u>), include an outreach effort.</p>	City revisions; Planning Commission Comments
76	7-8	<p><i>Revise Policy GOV-2-1 as follows:</i></p> <p>Policy GOV-2-1: Distribute important information on government actions and processes in multiple <u>open data</u> formats using digital and physical venues to reflect diverse community needs and preferences.</p>	City revisions; Planning Commission Comments
77	7-9	<p><i>Text under Goal ART-1 revised to read as follows:</i></p> <p>The City sponsors or supports a number of arts and culture programs and events in the community. Building on the success of these events, the City can continue to support and promote expanded arts in Elk Grove, creating that provide amenities for existing and future residents and celebrate the City as a cultural destination in the region.</p>	Comment 173
78	7-9 and 7-10	Additional photos of arts and cultural events in Elk Grove included.	Comment 175
79	7-11	<p><i>Revise the fifth paragraph to read as follows:</i></p> <p>A number of community institutions are dedicated to the preservation of historical and cultural resources, including the California Native American Heritage Commission, the Elk Grove Historical Society, <u>the Old Town Foundation</u>, and the Elk Grove Historic Preservation Committee.</p>	City revisions; Planning Commission Comments
80	7-12	<p><i>Revise Policies HR-1-2 and HR-1-3 as follows:</i></p> <p>Policy HR-1-2: <u>Encourage the appropriate, adaptive reuse of historic resources and buildings. Strive to preserve historic buildings and resources through adaptive re-use.</u></p>	City revisions; Planning Commission Comments

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		<p>Policy HR-1-3: Encourage appropriate adaptive reuse of historic resources to <u>Encourage efforts that prevent the misuse, disrepair, and demolition of historic resources and buildings.</u></p>	
81	7-12	<p><i>Revise Policy HR-2-2 as follows:</i></p> <p>Policy HR-2-2: Consult when appropriate with local Native American tribes, the California Native American Heritage Commission, and any other appropriate organizations and individuals to minimize potential impacts to cultural and tribal resources.</p>	City revisions; Planning Commission Comments
82	7-15	<p><i>Revise Policy PT-1-8 as follows:</i></p> <p>Policy PT-1-8: Encourage the CCSD to develop self-supporting recreation programs for activities that go beyond basic recreation needs. Examples include outdoor and indoor swimming lessons or sports teams, and classes (such as a preschool or day care facility) or reading groups at community centers. The City may also develop and operate such programs independently. To the extent appropriate and mutually agreed, partner with the CCSD on programs and activities that benefit residents and/or improve services.</p>	CCSD Parks Comment letter
83	7-16	<p><i>Correct the formatting inconsistencies on this page as follows:</i></p> <ul style="list-style-type: none"> • <i>Bold the titles of policies PT-1-13 and PT-1-14</i> • <i>Correct the font type in Policy PT-2-2</i> 	City revisions
84	7-18	<p><i>New paragraph about Habitat Conservation Plans generally and background information on the South Sacramento Habitat Conservation Plan (SSHCP) added after second paragraph:</i></p> <p><u>Some jurisdictions elect to adopt Habitat Conservation Plans (HCPs), a tool for the management and preservation of lands providing valuable natural habitat that seek to balance the needs of endangered or threatened species with the needs and desired uses of the property owner. The adoption and implementation of HCPs is provided under the federal Endangered Species Act (ESA). An HCP is a voluntary agreement between the federal government and a party (private or state/local government) that allows development projects to obtain an incidental take permit under the ESA in exchange for establishing protections and management strategies for endangered and threatened species. A local example of an HCP is the South Sacramento Habitat Conservation Plan (SSHCP), adopted by the County of Sacramento and other public agency partners (including the City of Rancho Cordova, City of Galt, Sacramento County Water Agency, and others) in October 2018. The City may consider adopting a Habitat Conservation Plan to enhance management and protection of lands within the Planning Area that are known to contain habitat for threatened or endangered species.</u></p>	Comment 184

85	7-18	<p><i>Update the (existing) second paragraph under Open Space and Habitat Conservation as follows:</i></p> <p>Some streams and creeks in Elk Grove are surrounded by dense riparian vegetation, and these areas provide wildlife habitat as well as recreational opportunities for residents and visitors. <u>Maintenance in these areas is often necessary for flood protection and fire prevention, to limit homeless activity, and to address other unsafe conditions.</u> In addition, there are plant and animal species in the Planning Area that are listed as threatened or endangered at the State and/or national level, including Swainson’s hawk and the valley elderberry longhorn beetle. These special-status species require special consideration when planning future development.</p>	City revisions; Planning Commission Comments
86	7-21	<p><i>Revise the first paragraph as follows:</i></p> <p>Greenhouse gas (GHG) emissions contribute to local air quality concerns. The Global Warming Solutions Act (Assembly Bill [AB] 32) requires that California significantly reduce its emissions of GHGs in order to minimize the impacts of climate change. To ensure the City is taking steps to meet its fair share of the State’s GHG reduction goals, Elk Grove has completed an inventory of GHG emissions and adopted a Climate Action Plan (CAP). Table 7-1 categorizes Citywide GHG emissions by sector as of 2013 (listed as metric tons of carbon dioxide equivalents, or MTCO_{2e}), the most recent year for which an inventory has been completed.</p>	
87	7-22	<p><i>Water Supply section on p. 7-22 revised as follows:</i></p> <p>Water supply in Elk Grove consists of both surface water and groundwater sources. Runoff from precipitation and snowmelt from the Sierra Nevada are the main sources of surface water supply in the City. However, a majority of the City’s water supply comes from groundwater. <u>The South American Subbasin of the Sacramento Valley Groundwater Basin is the hydrologic basin underlying this area.</u></p> <p>There are three water service providers in the Planning Area: the Elk Grove Water District (EGWD), which is managed by the Florin Resource Conservation District; the Omochumne-Hartnell Water District (OHWD); and the Sacramento County Water Agency (SCWA) (see Figure 7-1). The EGWD serves residents and businesses in a triangular area of approximately 13 square miles within the 2018 City limits. The service area is bounded to the north by Sheldon Road, to the east by Grant Line Road, to the south by Union Industrial Park, and to the west by State Route (SR) 99. The SCWA’s South Service Area provides water service to all other portions of incorporated Elk Grove, as well as to the area to the north and east of the City boundaries. The OHWD, which expands across the eastern portion of the Planning Area, overlaps with parts of</p>	Comment 181

		<p>the SCWA. The OHWD serves only agricultural users while the SCWA serves customers in both the incorporated City and the Planning Area. The notable exception is the Rural Area, which is located within the service territory of these water agencies but, consistent with City policies, is not provided service for residential hookups where water is provided from individual wells. There are no water providers to the south of the City past Kammerer Road; this portion of the Planning Area is occupied primarily by agriculture and properties utilize water from on-site wells. The South American SubBasin of the Sacramento Valley Groundwater Basin is the hydrologic basin underlying this area.</p> <p><u>The State of California’s Sustainable Groundwater Management Act (SGMA), signed into law in 2014, requires governments and water agencies of high and medium priority basins to stop the practice of overdrawing groundwater and to balance levels of groundwater pumping and recharge. Under the SGMA local Groundwater Sustainability Agencies that manage critical groundwater basins in California are required to adopt Groundwater Sustainability Plans.</u></p> <p><u>The California Department of Water Resources has classified the South American Subbasin as high priority under the draft 2018 SGMA Basin Prioritization framework. In 2018 the Sacramento Central Groundwater Authority initiated development of a Groundwater Sustainability Plan for the South American Subbasin, which is expected to be completed in 2022.</u></p>	
88	7-26	<p><i>Remove Standard NR-1.2b as follows:</i></p> <p>Standard NR 1.2b: Develop a Noxious Weed Ordinance that includes regulatory standards for construction activities that occur adjacent to natural areas to inhibit the establishment of noxious weeds through accidental seed import.</p>	City revisions
89	7-29	<p>Standard NR-1-6.d revised as follows:</p> <p><i>Standard NR 1-6d:</i> To the extent possible, retain natural drainage courses in all cases where preservation of natural drainage is physically feasible and consistent with the need to provide flood protection. <u>Where a stream channel is to be created, such man-made channels shall be designed and maintained such that they attain functional and aesthetic attributes comparable to natural channels.</u></p>	Comment 157
90	7-30	<p>Provision related to clustering in the Rural Area under Policy NR-1-9 deleted; policy states that clustering shall not be allowed in the Rural Area:</p> <p>Policy NR-1-9: Encourage development clustering where it would facilitate on-site protection</p>	Comments 159, 160, 161, 166, 169, 171, 276, 295, 319

of woodlands, grasslands, wetlands, stream corridors, scenic areas, or other appropriate features such as active agricultural uses and historic or cultural resources under the following conditions and requirements. ~~Except as provided below, clustering shall not be allowed in the Sheldon/Rural Area.~~

- ~~Urban infrastructure capacity is available for urban use. If clustering is allowed in the Rural Area, those properties shall be exempt from providing urban water and sewer connections in accordance with the policies of the Sheldon/Rural Area Community Plan (see Chapter 9).~~
- On-site resource protection is appropriate and consistent with other General Plan policies.
- The architecture and scale of development are appropriate for and consistent with the intended character of the area.
- Development rights for the open space area are permanently dedicated and appropriate long-term management, with funding in perpetuity, is provided for by a public agency or another appropriate entity

91 7-31

Revise the section Policies: Tree Preservation as follows:

Comment 168

Policies: Tree Preservation and Canopy Expansion

Policy NR-2-1: Preserve large native oak and other native tree species as well as large non-native tree species that are an important part of the City’s historic and aesthetic character. When reviewing trees for preservation, consider the following general criteria:

- Health of the tree
- Safety hazards posed by the tree
- Suitability for preservation in place
- Biological value
- Aesthetic value
- Shade benefits
- Water quality benefits
- Runoff reduction benefits
- Air quality benefits (pollutant reduction)

Policy NR-2-2: Maximize ~~and maintain~~ tree canopy coverage on public lands

		<p>and in open spaces <u>by continuing to plant new trees and ensuring sufficient right-of-way width for new developments to provide tree plantings.</u></p> <p><u>Policy NR-2-3:</u> <u>Maintain tree health and canopy coverage throughout Elk Grove by managing and caring for all trees on public lands.</u></p> <p><u>Policy NR-2-4:</u> <u>Preserve and plant trees in appropriate densities and locations to maximize energy conservation and air quality benefits.</u></p> <p><u>Policy NR-2-35:</u> <u>Ensure that trees that function as an important part of the City’s or a neighborhood’s aesthetic character or as natural habitat on public and private land are retained or replaced to the extent possible during the development of new structures, roadways (public and private, including roadway widening), parks, drainage channels, and other uses and structures.</u></p> <p><u>Policy NR-2-6:</u> <u>Promote the planting of drought resistant shade trees with substantial canopies as part of private development projects and require, where feasible, site design that uses trees to shade rooftops, parking facilities, streets, and other facilities.</u></p> <p><u>Policy NR-2-4:</u> <u>Maintain and enhance an urban forest by preserving and planting trees in appropriate densities and locations to maximize energy conservation and air quality benefits.</u></p>	
93	7-31	<p><i>New Policy NR-2-7 added as follows:</i></p> <p><u>Policy NR-2-7:</u> <u>Support regional and community-led arborization efforts, including the joint annual campaign by the Sheldon Community Association and the Greater Sheldon Road Estates Homeowners Association to increase native oak tree cover in the Rural Area.</u></p>	Comment 170
94	7-32	<p><i>New Policy NR-3-6 added as follows:</i></p> <p><u>Policy NR-3-6:</u> <u>Support and coordinate with the efforts of the Sacramento Central Groundwater Authority in the development, adoption and ongoing implementation of the Groundwater Sustainability Plan for the South American Subbasin.</u></p>	Comment 181

94A	7-34	<p><i>Policy NR-4-2 is revised to read as follows:</i></p> <p>Policy NR-4-2: Minimize air pollutant emissions from all City facilities and operations (<u>including in-house and contracted</u>) to the extent feasible and consistent with the City’s needs to provide a high level of public service.</p>	Comments from SMAQMD
94B	7-35	<p><i>Policy NR-4-9 is revised to read as follows:</i></p> <p>Policy NR-4-9: Prohibit the future siting of sensitive land uses, such as hospitals, schools, day care facilities, elderly housing, convalescent facilities, and all residential facilities within the distances recommended by the California Air Resources Board <u>and applicable guidance from SMAQMD</u> for air pollutant emission sources, unless adequate mitigation measures are adopted and implemented.</p>	Comments from SMAQMD
94C	7-35	<p><i>Standard NR-4-10a is revised to read as follows:</i></p> <p>Standard NR-4-10.a: Require the provision of buffers between sensitive land uses and sources of odor <u>and toxic air contaminants</u>. The City shall implement this policy when siting future sensitive land uses within the proximity of existing odor <u>and toxic air contaminant</u> sources or when siting new odor-producing <u>or toxic air contaminant</u> land uses within the proximity of existing sensitive land uses.</p>	Comments from SMAQMD
Chapter 8: Services, Health, and Safety			
95	8-17	<p><i>Revise the second and third paragraph as follows:</i></p> <p>Figure 8-1 shows areas within the 100-year floodplain zones. The map uses Flood Insurance Rate Map 100-year floodplain data produced by FEMA. The Flood Insurance Rate Map is the only official mapping for the purposes of National Flood Insurance Program regulations and coverage areas. Additional flood risk data, including 200-year flood data shown in Figure 8-2, described below, is not approved by FEMA for use in relation to the National Flood Insurance Program. Figure 8-2 shows areas within the 200-year floodplain that are potentially subject to urban level of flood protection requirements when flood depths of 3 feet or greater could occur. This map identifies areas where higher standards of development and flood protection may be required prior to the issuance of building permits.</p> <p>Figure 8-2 was developed using data provided by the DWR, supplemented by floodplain studies commissioned by the City, covering local creek systems that have watershed areas of at least 10 square miles. These areas include the Laguna Creek and Deer Creek/Cosumnes River</p>	Comment 242

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		watersheds, North Delta, and Shed C Channel, as well as the Sacramento River watershed, which affects local creek systems.	
96	8-19 and 8-20	Figure 8-2 updated to show essential facilities and utilize the latest 200-year floodplain data dated Fall 2018.	Comment 244
97	8-21	<i>Last sentence of first paragraph revised to read as follows:</i> ...the levees and dams along the Sacramento and American Rivers <u>north of the City (except as described below)</u> do not fail.	Comment 243
98	8-23	<i>First sentence of second paragraph revised to read as follows:</i> Failure of the regulation dams at Folsom (<u>along the American River and influencing the Sacramento River</u>) and Sly Parks (<u>along the Cosumnes River and influencing Deer Creek</u>) on the Sacramento River and one of the tributaries along the Cosumnes River has the potential to cause human injury or loss of life in Elk Grove.	Comment 245
99	8-31	<i>Policy ER-2-14 revised as follows:</i> Policy ER-2-14: Parcels should not be created where any of the parcel's access or preservation easements, floodplain, marsh or riparian habitat, or other features would leave insufficient land to build and operate structures. This policy shall not apply to open space lots, <u>landscape corridors, or other City-approved use</u> specifically created for dedication to the City or another appropriate party <u>entity</u> for habitat protection, flood hazard management, drainage, or wetland maintenance.	Comment 225
100	8-32	<i>Formatting of text font type in Policy ER-2-16 revised for consistency.</i>	City revisions
101	8-32	<i>Policy ER-2-17 revised as follows:</i> Policy ER-2-17: Require all new urban development projects to incorporate runoff control measures to minimize peak flows of runoff and/or assist in financing or otherwise implementing comprehensive drainage plans.	Comment 228
102	8-32	<i>Policy ER-2-18 revised as follows:</i> Policy ER-2-18: Drainage facilities should <u>shall</u> be properly maintained to ensure their proper operation during storms.	Comment 226
103	8-36	<i>First paragraph, revise to read as follows:</i> Fire planning and preparation <u>prevention</u> activities in Elk Grove are primarily undertaken	Comments 194, 216

		<u>provided</u> by the Cosumnes Fire Department, part of the CCSD.	
104	8-38	<p><i>Policy ER 6-3 revised to read as follows:</i></p> <p>Policy ER-6-3: Participate in the regional leadership organization, Valley Vision, which has launched the Business Resiliency Initiative (BRI) activities and initiatives to help reduce risks and economic impacts of potential disasters related to extreme weather.</p>	Comment 252
105	8-39	In Policy ER-6-6, “Elk Grove Water Agency” changed to “Elk Grove Water District.”	Comment 254
106	8-39	<p><i>Policy ER-6-9, revise to read as follows:</i></p> <p>Policy ER-6-9: Participate in the development and <u>Facilitate</u> implementation of measures identified in the <u>Metro Fire’s Cosumnes Fire Department’s Community Wildfire Protection Plan (CWPP)</u> for the protection of human life and reduction in loss of property, critical infrastructure, and natural resources associated with wildfire.</p>	Comments 194, 216
107	8-40	<p><i>Revise the second paragraph to read as follows:</i></p> <p><u>Fire, rescue and emergency medical services are provided to Elk Grove through the CCSD, an independent special district. The Cosumnes Fire Department provides public information to residents about fire and injury prevention and responds to emergency calls in Elk Grove and Galt. The CCSD provides fire protection, fire prevention, and emergency medical, and rescue services to the cities of Elk Grove and Galt, as well as unincorporated areas in the region covering over 157 square miles. The CCSD Fire Department operates out of eight fire stations: six in Elk Grove area, and two in the City of Galt, and a state-of-the-art fire training facility. The fire stations are currently located in Elk Grove, East Franklin, East Elk Grove, Laguna Creek, Lakeside, the Elk Grove–West Vineyard area and Galt.</u></p>	Comments 194, 216
108	8-40	<p><i>Revise the last paragraph to read as follows and move to immediately below the first paragraph under the Fire Protection header, and revise as follows:</i></p> <p><u>Due to the area’s rapid growth and subsequent increase in traffic congestion, the Cosumnes Fire Department responds to more emergency call than the State average. The established response time goal for the department is the first unit should arrive on scene within seven minutes of receipt of the 911 call in the dispatch center, 90 percent of the time. 6 minutes or less for 90 percent of the calls in urbanized areas of the District. The response time goal for rural areas is 12 minutes or less for 90 percent of calls.</u></p>	Comments 194, 216

109	8-41	<p><i>First paragraph, revise as follows:</i></p> <p><u>Automatic and Mutual Aid Agreements</u> The Cosumnes Fire Department is part of a regional mutual aid agreement (“Agreement”) for emergency response. This Agreement ensures that each participating agency has access to the supplies, equipment, materials, and personnel it needs when additional resources become immediately necessary due to the magnitude of the emergency. Mutual aid for supplemental fire prevention, fire investigation, EMS, hazardous materials control, water rescue, technical rescue, and/or other emergency support during a major fire, disaster, or other emergency are all covered under the Agreement. The CCSD is the primary fire protection and emergency medical response service within the SOIA Area. Sacramento Metropolitan Fire District (SMFD), the City of Sacramento Fire Department (SFD), and the CCSD share common jurisdictional boundaries and participate in a regional automatic/ mutual aid agreement. The CCSD Fire Department also has a mutual aid agreement with the surrounding volunteer fire districts in southern Sacramento County, including Wilton, Courtland, Walnut Grove, and Herald Fire Districts. As a result of the existing automatic and mutual aid agreements the closest unit available is dispatched to an incident and fire district boundaries are not an issue when an incident occurs.</p>	Comments 194, 216
110	8-42	<p><i>First paragraph under Goal INF-1, revise to read as follows:</i></p> <p>Domestic water service in Elk Grove is provided by two public water service providers: the Sacramento County Water Agency (SCWA) and the Elk Grove Water ServiceDistrict (EGWD). No residential water service is provided in the Rural Area consistent with City policies. The southern portion of the Planning Area (west of SR-99) is outside of any water district, although is managed by the Sacramento Central Groundwater Authority; homes and businesses located in this area are generally on private well systems but will transition to water service upon urban development.</p>	Comment 258
111	8-43	<p><i>Policy INF-1-3 revised to read as follows:</i></p> <p>Policy INF-1-3: Protect the quality and quantity of groundwater resources, including those which serve households and businesses which rely on private wells. <u>The City shall support and participate in local efforts to implement the State’s Sustainable Groundwater Management Act.</u></p>	Comment 209
112	8-43	<p><i>Policy INF-1-4 revised to read as follows:</i></p> <p>Policy INF-1-4: <u>Work with Regional San and SCWA to establish and expand recycled water infrastructure for residential, commercial, industrial, and recreational facilities and support the</u></p>	Comment 261

		use of reclaimed water for irrigation wherever feasible.	
113	8-44	<p><i>Revise Policy INF-2-1 as follows:</i></p> <p>Policy INF-2-1: Sewage conveyance and treatment capacity shall be available in time to meet the demand created by new development, or shall be assured through the use of bonds or other sureties to the City's satisfaction.</p>	City revisions
114	8-45	<p><i>Policy INF-2-4 revised to read as follows:</i></p> <p>Policy INF-2-4: Residential development on lots smaller than 2 gross acres shall be required to connect to public sewer service, except in the Rural Area. <u>This policy shall not apply to lots smaller than 2 gross acres within the Rural Area Community Plan that existed as legal lots as of November 19, 2003 and these lots shall not be required to connect to public sewer service as a condition of development.</u></p>	Comment 229
115	8-46	<p>Add the following note in the margin against Policy CIF-2-1:</p> <p><u>See Standard LU-5-3.b regarding private undergrounding of existing overhead utilities as part of development project approval.</u></p>	Comment 230
116	8-50	<p><i>Revise Policy IFP-1-3 as follows:</i></p> <p>Policy IFP-1-3: Require secure financing for all components of the transportation system through the use of special taxes, assessment districts, developer dedications, or other appropriate mechanisms in order to provide for the completion of required major public facilities at their full planned widths or capacities in one phase <u>consistent with this General Plan and any applicable service master plan</u>. For the purposes of this policy, “major” facilities shall include the following:</p> <ul style="list-style-type: none"> • Any roadway of an arterial/collector classification or above, including any roadway shown on the Transportation Network Diagram (Figure 3-6). • All wells, water transmission lines, treatment facilities, and storage tanks needed to serve the project. • All sewer trunk and interceptor lines and treatment plants or treatment plant capacity. 	City revisions
117	8-50	<i>Relocate the “What are zipper streets”? box to follow Policy IFP-1-5 (move to next page).</i>	City revisions
118	8-51	<i>Fix the formatting on IFP-1-5 to remove the second:</i>	City revisions
119	8-52	<p><i>Revise Policy IFP-1-9 to read as follows:</i></p> <p>Policy IFP-1-9: Public facilities, such as drainage, water, sewer and roadways, should be phased</p>	Comment 264

		in a logical manner which avoids “leapfrog” development and encourages the orderly development of roadways, water and sewer, and other public facilities. The City shall not provide public financing or assistance for projects that do not comply with the planned phasing of public facilities. Interim facilities may be used only if specifically approved by the City Council.	
120	8-54	<p><i>Revise Policy HTH-1-7 to read as follows:</i></p> <p>Policy HTH-1-7: Strive to increase the number of farmers markets and community gardens throughout the City <u>and provide for urban farming opportunities.</u></p>	Comment 267
121	8-55	<p><i>Revise Policy CS-1-1 to read as follows:</i></p> <p>Policy CS-1-1: Cooperate with the Sacramento Public Library Authority in the planning, <u>financing</u> and implementation of future library facilities and facility expansions in Elk Grove.</p>	Comments 214 and 268
122	8-58	<p><i>Revise the second paragraph to read as follows:</i></p> <p>However, noise sources associated with minor maintenance and operation of residential real property such as HVAC, pool equipment, and lawn maintenance equipment are exempt during reasonable daytime hours. Proper land use practices can minimize the proximate placement of conflicting uses. This chapter contains policies that promote methods other than sound walls in all cases and discourage their construction in existing neighborhoods. While the City discourages the use of sound walls because of the potential for unsightly streetscapes they may create, particularly if they are installed in front yard areas and redirect noise to other parts of the community, in some instances their benefits may outweigh their drawbacks, therefore making them the most viable solution to achieve the policies and standards of this General Plan.</p>	City revisions
123	8-52	<p>Revise the title of Table 8-4 to read “NOISE LEVEL PERFORMANCE STANDARDS FOR NEW PROJECTS AFFECTED BY OR INCLUDING NONTRANSPORTATION NOISE SOURCES*”</p> <p>Add a new note that reads “* Applies to noise-sensitive land uses only.”</p>	City revisions
Chapter 9: Community and Area Plans			
124	Throughout Chapter 9	Name “Sheldon/Rural Area” changed to “Rural Area.” Goals and Policies numbered “SRA” revised to “RA”	Comments 294, 310
125	9-11	<p><i>Revise Standard SEPA 1-2.e to read as follows:</i></p> <p>Standard SEPA 1-2.e: Roadways shall consist of the full section from curb to curb, streetlights, sidewalks, and median landscaping, where applicable. Phased construction of sidewalks, temporary asphalt sidewalks, and other measures may be allowed at the discretion of the City.</p>	City revisions

		<p>Roadside landscaping (and walls where required) shall be installed concurrent with adjacent development consistent with project phasing. The City may allow the design and construction of portions of arterial or thoroughfare roadways to be deferred where capacity associated with such portions is not immediately needed, to meet Level of Service goals provided such deferral is consistent with General Plan Standard MOB-7-1.a, as set forth in the General Plan, and/ or applicable environmental document(s). If the deferral involves improvements within or adjacent to a development and the improvements are not eligible under the Elk Grove Roadway Fee Program, the City will require the developer to make an in-lieu payment pursuant to Elk Grove Municipal Code Chapter 12.03 (Street Improvements) or establish and/or participate in a finance mechanism acceptable to the City to fund the differed improvements.</p>	
126	9-14	<p><i>Standard SEPA-5-3.a revised as follows to clarify that all the provisions listed are required:</i></p> <p><i>Standard SEPA-5-3.a:</i> Amendments to the land plan affecting employment-generating land (e.g., office, light industrial/flex) shall:</p> <ul style="list-style-type: none"> • Not result in a reduction of acreage for employment-generating land from that provided at initial adoption in July 2014; and- • Be located on a site or sites with equal or higher development potential (e.g., along arterials, collectors, and/or transit corridors; land configuration and size allows for efficient and practical development); and- • Require a super-majority (4/5) vote of the City Council to approve. 	Comment 334
127	9-19	<p><i>First line of second paragraph under Plan Setting section revised to read as follows:</i></p> <p>The Sheldon/Rural Area as a matter of policy lacks the infrastructure typically found in an urban or suburban community, such as sidewalks, curbs and gutters, and widened improved roads.</p>	Comments 273, 283
128	9-20	<p><i>Under Preservation of the Rural Lifestyle and Heritage section, bullet points revised as follows:</i></p> <ul style="list-style-type: none"> • Support the rural area as a key feature of the community'sCity's identity. • Maintain agricultural and related uses, such as horticulture, animal husbandry, and the keeping of large animals. • Promote conservation and restoration of native flora and fauna and of both surface and ground water resources. • Create and foster agricultural and farmingconservation-related community activities and educational events. • Continue to prohibit urban sewer services. • Identify service needs in the rural area that reflect rural values. 	Comments 284, 307

		<ul style="list-style-type: none"> Develop design standards that retain the visual character of the area but provide for needed services. 	
129	9-22	<p><i>Revise the paragraph following Goal SRA-1 (An Established Rural Community) to read as follows:</i></p> <p>The Sheldon/Rural Area reflects Elk Grove’s rural and agricultural heritage and culture and contributes to the diversity of the community and its values by offering residents a rural lifestyle characterized by farm-style homes on lots generally 2 acres and larger with open space or farmland nearby. <u>The City desires to conserve the heritage and culture of the rural lifestyle for future generations as a way of celebrating community history and providing diversity of housing stock. This occurs through the preservation of this area through area planning and limiting the potential for conversion to more intensive uses and densities. Policies that recognize and support the continuation of this rural lifestyle and agricultural heritage are necessary to preserve the character of this area.</u></p>	Comment 287
130	9-22	<p><i>Policy RA-1-2, third bullet point, revised as follows:</i></p> <p>Policy SRA-1-2: As expansion occurs, <u>ensure require</u> that new development in the North Study Area is compatible with the character of the Sheldon/Rural Area <u>with lots a minimum of two gross acres.</u></p>	Comment 275, 302
131	9-23	<p><i>Policy RA-1-5 revised to read as follows:</i></p> <p>Policy SRA-1-5: Support the establishment or continuation of land uses unique to the Sheldon/Rural Area, including horticulture, keeping of large animals, and other uses that support ongoing agricultural <u>and conservation</u> activities.</p>	Comment 289
132	9-23	<p><i>Policy SRA-1-6 revised to read as follows:</i></p> <p>Policy SRA-1-6: Celebrate Elk Grove’s farming <u>and ranching</u> heritage and include it as part of the City’s overall economic strategy.</p>	Comment 303
133	9-23	<p><i>Add a new Policy RA-1-8 that reads as follows:</i></p> <p><u>Policy RA-1-8: Prohibit gated neighborhoods and subdivisions in the Rural Area.</u></p>	Comment 277
134	9-24	<p><i>Revise the paragraph under Goal RA-2 to read as follows:</i></p> <p>The Sheldon/Rural Area lacks the infrastructure typically found in an urban or suburban community, such as connection to a sewer system; rather, parcels utilized septic systems. <u>parcels use individual or small combined septic systems.</u> Most residents also maintain their own</p>	Comment 278

		water wells. This lack of urban infrastructure is consistent with the character of the community, and continuing this approach for services is a key component to preservation of the Sheldon/Rural Area's unique setting in the larger community.	
135	9-24	<p><i>Revise Policy SRA-2-1 to read as follows:</i></p> <p>Policy SRA-2-1: Prohibit the extension of sewer service into the Sheldon/Rural Area. Lots in the Sheldon/Rural Area should shall be large enough to accommodate septic systems. This policy shall not be construed to limit the ability of any sewer agency to construct interceptor lines through or adjacent to the Sheldon/Rural Area, (provided that no trunk or service lines are included) <u>in order to serve other areas of the City or region.</u></p>	Comment 271, 312
136	9-24	<p><i>Revise Policy SRA-2-4 to read as follows:</i></p> <p>Policy SRA-2-4: Limit the extension of water service into the Sheldon/Rural Area. Lot sizes should shall be large enough to accommodate private water wells. This policy shall not be construed to limit the ability of any water agency to construct <u>transmission</u> lines through or adjacent to the Sheldon/Rural Area <u>in order to serve other areas of the City.</u></p>	Comment 290
137	9-24	<p><i>Policy SRA-2-5 revised to read as follows:</i></p> <p>Policy SRA-2-5: Lots should shall be large enough to accommodate <u>be at least two gross acres to accommodate both private water wells and septic systems with adequate spacing to minimize the potential for groundwater depletion in order to minimize the potential for groundwater contamination.</u></p>	Comments 281, 291
138	9-25	<p><i>Policy SRA-4-1 revised to read as follows:</i></p> <p>Policy SRA-4-1: Improve, develop, and reuse Community Commercial areas in a manner compatible in design and scale with the existing character of the Sheldon town area and the various City regulations relative to development in the area, <u>consistent with the Old Town Sheldon Supplemental Design Guidelines and the Rural Commercial Combining Zone (RUC).</u></p>	Comments 282, 292
139	9-26 to 9-28	<p><i>Revise the introduction and Goal EEG-1 sections as follows:</i></p> <p>EASTERN ELK GROVE COMMUNITY PLAN</p> <p>The Eastern Elk Grove (EEG) Community Plan incorporates the prior East Elk Grove Specific Plan area (between Waterman Road, Bond Road, Bradshaw Road, and Grant Line Road) and the Elk Grove Triangle (Bradshaw Road, Bond Road, and Grant Line Road). These areas have been</p>	Comment 293

combined into one ~~common~~ community plan area ~~which serves as a~~ to illustrate and manage the transition from urban Elk Grove to the west, rural Sheldon to the north, and the future development areas and the Cosumnes River corridor to the southeast.

PLAN SETTING AND ORGANIZATION

The EEG Community Plan consists of approximately 2,165 acres located in the eastern portion of the Planning Area, as illustrated on Figure EEG-1. The EEG Community Plan is made up of two distinct sub-areas as follows:

- The East Elk Grove Sub-Area: This Community Plan supersedes the East Elk Grove Specific Plan adopted by the County of Sacramento in 1996. This sub-area is created to retain the development capacity limitations that were provided in the East Elk Grove Specific Plan and incorporate other policies relevant to the sub-area.

- Triangle Sub-Area: The Plan Area also incorporates the Triangle neighborhood recognizes the historic rural character of the area by incorporating a variety of Estate and Low Density Residential densities and neighborhood-serving commercial uses. The EEG Community Plan is bound by Grant Line, Waterman, and Bond Roads. The EEG Plan Area also borders the Sheldon/Rural Area to the north and east.

GUIDING PRINCIPLES

The following Guiding Principles identify the overall objectives of the Community Plan and guide the formulation of the land use plan and the policies and standards in the Community Plan.

- Provide a diverse set of housing types that address demographic trends and market needs.
- Transition residential lot sizes between the western portion of the Plan Area and the ~~Sheldon/Rural Area~~ to the north and east.
- Provide adequate public facilities (e.g., parks, schools).
- Promote a pattern of land uses and streets that support walking, bicycling, and transit, within the context of the planned density and intensity of development, as well as convenient automobile use.
- Create an integrated open space and recreation network.
- Offer convenient shopping opportunities for residents and employees.

- Provide employment opportunities within the Plan Area, specifically along the western edge.
- Encourage flexibility in the design of drainage corridors in the area to permit recreational uses and create attractive open spaces.

LAND USE PLAN

The EEG Community Land Use Plan map, as shown in Figure EEG-1, is based on the land use categories described in Chapter 3: Planning Framework. The Estate Residential designation as it occurs within the Triangle sub-area has been further divided into the following minimum lot sizes:

- Estate Residential (ER-1) with a 1-gross acre minimum lot size
- ~~• Estate Residential (ER-1/3) with a 1/3-acre minimum lot size~~
- Estate Residential (ER-1/4) with a 1/4-gross acre minimum lot size
- Low Density Residential (LDR) with a maximum density of 5 units per gross acre

Land uses within the EEG Community Plan are implemented through the City's Zoning Code. A SPA implements the Triangle sub-area of the EEG Community Plan and an overlay zoning district implements the prior East Elk Grove Specific Plan sub-area. Each zoning mechanism provides further guidance on development of land uses in each sub-area, including allowed uses, density and intensity, and development standards

GOALS AND POLICIES: EASTERN ELK GROVE

GOAL EEG-1: DEFINED RESIDENTIAL COMMUNITIES

The EEG Community Plan comprises two residential communities: the East Elk Grove sub-area and the Triangle sub-area. East Elk Grove is governed by a set of residential unit caps, while the Triangle is governed by minimum residential lot sizes that can be used to establish a maximum development level. The East Elk Grove sub-area has a total maximum buildout of 4,378 dwelling units with unit allocations designated to individual properties, as established under the East Elk Grove Specific Plan. The City tracks residential development in this sub-area and maintains records to ensure compliance with the maximum allowable dwelling units for each designated property. Individual property accounting will continue to be tracked by the City. Table EEG-1 summarizes the status of total dwelling units approved against the maximum allowable dwelling units in the East Elk Grove subarea as of the date of adoption of this Community Plan. The

		<p>anticipated dwelling unit capacity for the Triangle sub-area is also included.</p> <p>Policies: Community Plan Land Use <u>and Character</u></p> <p>Policy EEG-1-1 (<u>East Elk Grove Sub-Area</u>): Encourage larger lots to be provided adjacent to rural residential uses outside the Plan Area. <u>Development within the East Elk Grove sub-area shall conform to the development capacity limits provided in Table EEG-1 and the land use map provided in Figure EEG-1. Uses shall generally transition from commercial and industrial development along Waterman Road (west of the powerline corridor) to suburban residential development in the central area, to larger residential lots along Bradshaw Road. Residential development shall be designed with more suburban development patterns and characteristics, including curb and gutters, sound walls along arterial roadways, sidewalks, and street lights.</u></p> <p>Policy EEG-1-2 (<u>Triangle Sub-Area</u>): <u>Development within the Triangle sub-area shall transition from Low Density and Estate Residential developments in the south and southwest to larger lots in the north and northeast. This area shall recognize the historic rural character of the area and incorporate more rural characteristics, including roadside ditches for drainage, sidewalks generally constrained to one side of the street, street lighting limited to intersections, and other similar, improvements that reflect a more rural character.</u></p>	
140	9-29	<i>Update Figure EEG-1 to reflect revisions to Figure 3-4, Land Use Diagram.</i>	City revisions
141	9-30	<p>First and second paragraphs revised as follows:</p> <p>The EEG Community Plan is crossed by two major stream corridors, as shown in Figure EEG-2. The northerly corridor is an unnamed tributary to Laguna Creek; the southerly branching corridor is the upstream reach of Elk Grove Creek. Both corridors are to be reconstructed as natural-appearing riparian channels to improve local drainage and flood control. <u>Reconstructed channels are often necessary in the vicinity of Elk Grove, since some stream corridors have been modified over time by farming activities. Reconstruction of these channels can return more natural elements to these corridors. The cost of stream channel reconstruction work that is performed in conjunction with land development projects is to be borne by the developer.</u></p> <p><u>Meandering stream channels are preferred from an environmental standpoint because this pattern provides for the slowing of water flows and reduces the sediment carried through the water, which in turn improves water quality. The reconstructed meandering channels also create</u></p>	Comment 342

		an important visual open space, and functionally establish a habitat link to the various outlying detention ponds and to the power transmission corridor. The wide channel section contains a meandering low-flow channel or multithreaded channel to create random islands of vegetation and ponds along the bottom. Just above the low-flow channel, terraced areas provide habitat zones for wetland flora and fauna. Planted side slopes and riparian areas beyond the banks act as an ancillary habitat zone and also serve as a protection buffer for created wetlands.	
Chapter 10: Implementation Strategy			
142	10-4	<i>Last paragraph, third sentence revised to read:</i>	Comment 352
		Each source provides additional guidance, either for a specific topic or for <u>geographic</u> subareas of the City, with varying levels of regulatory authority.	
143	10-17	<i>New Implementation Action added as follows; Actions 1.5 and 1.6 renumbered accordingly.</i>	Comment 108
		<u>1.5 Development Review Process Streamlining.</u> <u>The City will regularly review and evaluate the process for development projects and identify specific ways to decrease review time, increase efficiency for staff, and increase certainty for applicants.</u> <u>Related Policies and Standards: RC-2-4</u> <u>Time Frame: On Going</u> <u>Action Lead: Development Services</u> <u>Action Support: Economic Development</u>	
143A	10-17	<i>Implementation Action 1.6 (previously 1.5) revised to read as follows:</i>	Comments from SMAQMD
		1.5 6 Update Standard Conditions of Approval. Update the City’s Standard Conditions of Approval (COA) list/ template for development projects for consistency with General Plan policies. The COA list/template should include standard conditions that apply to all projects, and thresholds/criteria for conditions that apply in specific circumstances and/or for specific types of projects. New or updated conditions may include the following: <ul style="list-style-type: none"> • Undergrounding utilities. (LU-5-3) • Mitigation of loss of qualified agricultural lands at 1:1 ratio. (AG-1-5) • A requirement for development projects to comply with the Sacramento Metropolitan Air Quality Management District’s (SMAQMD) rules and thresholds for preparing AQ-15 plans. (NR-4-84-1) • A requirement for utilities and infrastructure improvements to be financed and constructed prior to occupancy of new development. (INF-1-1, INF-2-1, IFP-1-8) 	

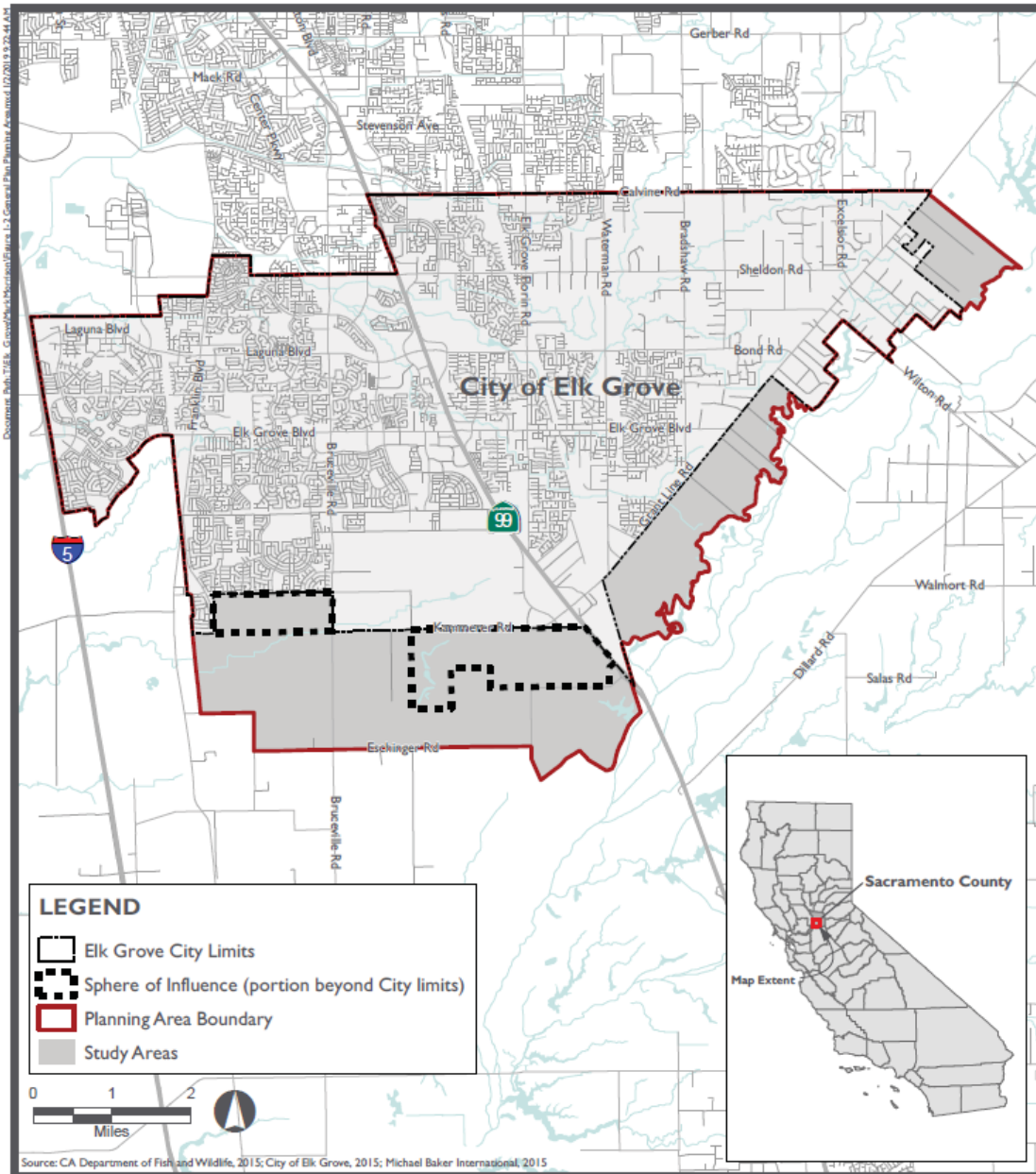
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144	10-17	<i>Implementation Action 1.7 – Community Benefit Agreements for Public Realm Improvements deleted. Actions 1.8 through 1.10 renumbered accordingly.</i>	Comment 363
145	10-37	<i>New Implementation Action added:</i> 6.5 Urban Farming Standards. <u>Develop locational, site planning, and performance standards to guide appropriate development of urban farming uses of various types and sizes and to minimize potential adverse impacts on adjacent and surrounding properties.</u> <u>Related Policies and Standards: AG-2-2</u> <u>Time Frame: FY-19/20</u> <u>Action Lead: Development Services</u> <u>Action Support: Strategic Planning</u>	Comment 357
146	10-43	<i>Implementation Action 8.4 – Sheldon/Rural Area Clustering Study deleted.</i>	Comments 347 and 350
147	10-45	<i>Implementation Action 9.10 revised to read as follows:</i> 9.10 Response Procedures for Extreme Heat and Severe Weather Conditions. Develop a guide of City procedures to be followed in the event of severe weather conditions, such as excessive heat, extreme cold and heavy rain, including emergency services deployment, opening of local cooling shelters and warming shelters, and community notifications.”	Comment 383
147A	10-53	<i>Action 12.1 is revised to read as follows:</i> 12.1 Urban Forestry. Develop BMPs for tree planting and maintenance, including a preferred tree list and specifications for street trees (e.g., spacing, planting requirements, increased shading requirements to mitigate for higher temperatures), informed by guidance from the Sacramento Tree Foundation and SMAQMD	Comments from SMAQMD
147B	10-53	<i>Action 12.3 is revised to read as follows:</i> 12.3 Sustainable City Procurement. Implement an environmentally preferable purchasing program. Consider the inclusion of standards for locally produced goods, environmentally friendly cleaning products, recycled content for paper products, street furnishings, roadways, and construction materials, alternative fuel and/or zero emission vehicles, and hiring local and/or sustainable businesses for contract services. Balance the use of local and environmentally friendly products and services with their financial impact to the City and their benefits and effectiveness.	Comments from SMAQMD

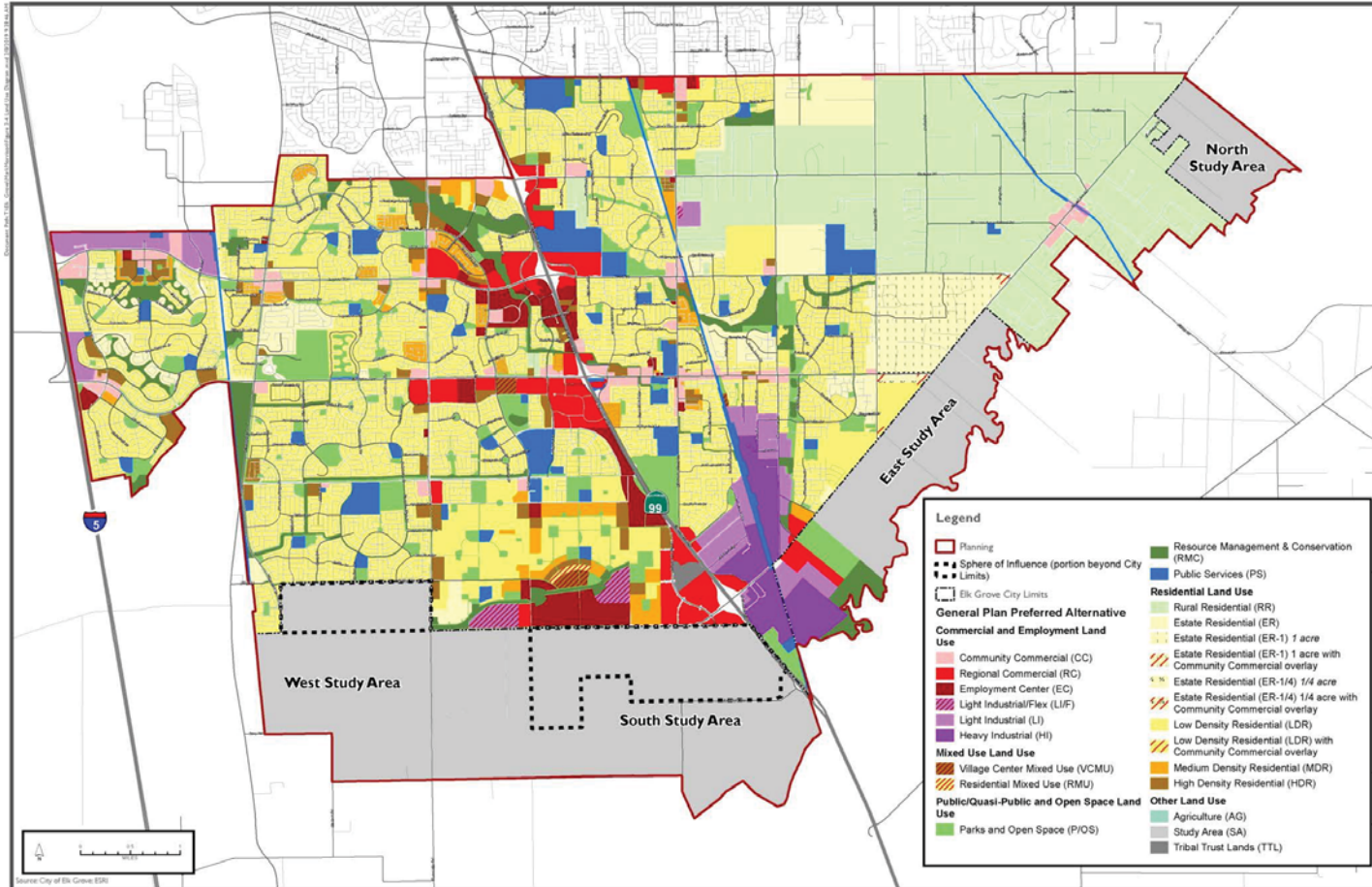
Chapter 11: Glossary			
147C	11-6	<p><i>Revise the definition of Compatible to read as follows:</i></p> <p>Compatible Capable of existing together without conflict or ill effects. <u>The characteristics of different uses or activities or design that allow them to be located near or adjacent to each other in harmony. Some elements affecting compatibility include the following: height, scale, mass and bulk of structures, pedestrian or vehicular traffic, circulation, access and parking impacts, landscaping, lighting, noise, and odor. Compatibility does not mean “the same as.” Rather, it refers to the sensitivity of development proposals and limiting conflict with existing development. For instance, an apartment complex may be located next to a single family home if it addresses elements such as lighting, noise, and building mass along the shared property line.</u></p>	City revision
148	11-6, 11-8, 11-9	<p><i>Terms and definitions added to the glossary as follows:</i></p> <p>Clustering: <u>A form of planned development that concentrates buildings on a portion of the site (cluster area) to allow the remaining, undeveloped land to be preserved to protect sensitive land areas, preserve historic or cultural resources, preserve agricultural operations, or provide passive open space and recreation.</u></p> <p>Dry Sewer: <u>Public and/or private sewer facilities designed and constructed in accordance with standards and specifications for future connection into the public sanitary sewer system. The facilities are constructed from the future connection point in the existing public right-of-way or easement to each structure they serve. Sewer services are not operational at the time of construction and the pipe remains “dry” until public service is extended and connected to the improvements.</u></p> <p>Greenfield; Greenfield Development: <u>A greenfield is a large area of open land (typically vacant or in agricultural production) where there has been very limited or no prior development. Greenfield development is development on undeveloped greenfield parcels.</u></p> <p>Islanding: <u>The creation of an island of land surrounded by potential flood waters.</u></p>	Comments 396 and 397
149	11-7	<p><i>Definition of “development” revised to read as follows:</i></p> <p>Development The physical extension and/or construction of urban land uses<u>Any building, construction,</u></p>	Comment 301

renovation, mining, extraction, dredging, filling, excavation or drilling activity or operation; or any material change in the use or appearance of any structure or in the land itself. Development activities include, but are not limited to, subdivision of land; construction or alteration of structures, roads, utilities, and other facilities; installation of septic systems; grading; deposit of refuse, debris, or fill materials; and clearing of natural vegetative cover (with the exception of agricultural activities).

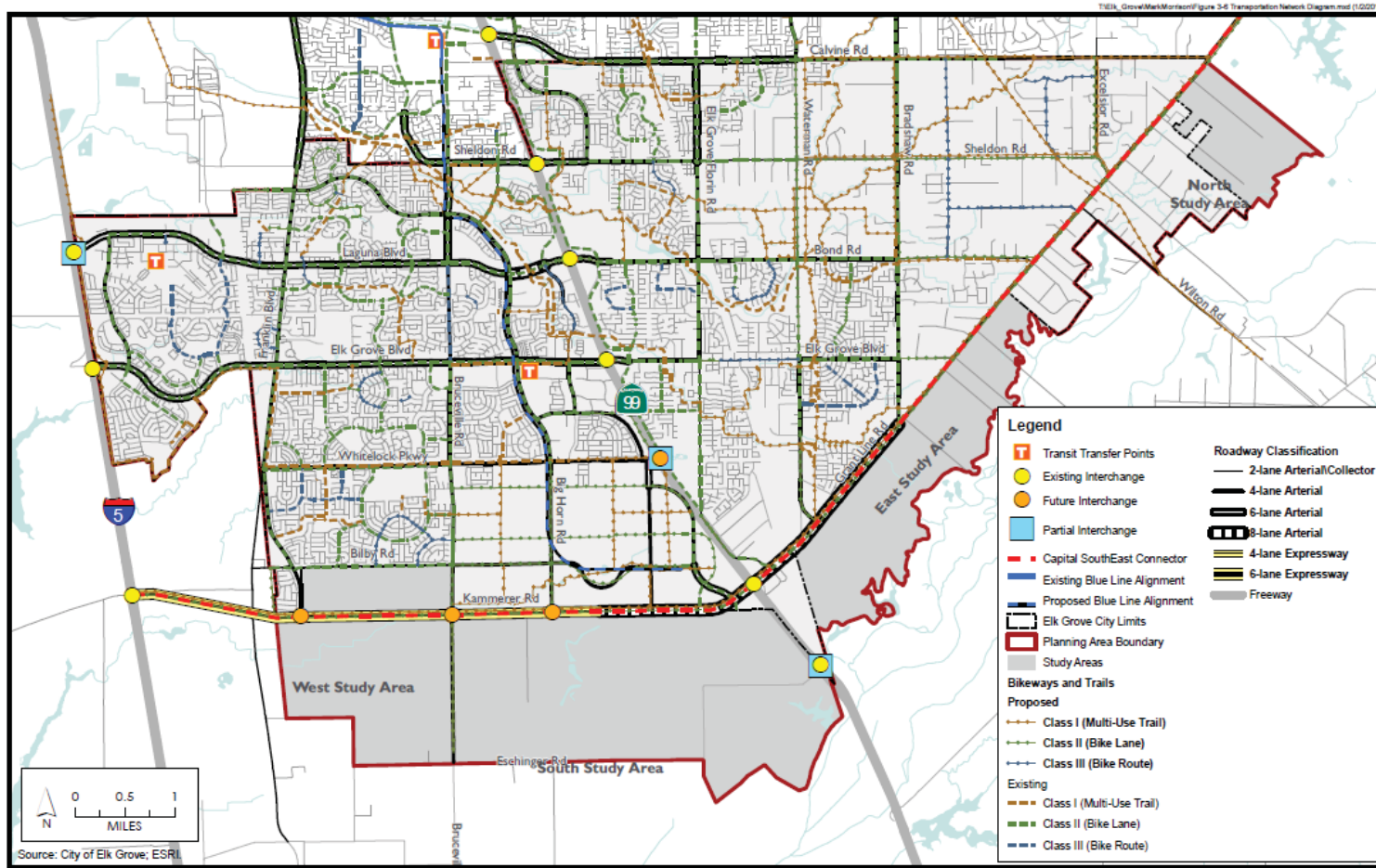
REVISED FIGURE 1-2: GENERAL PLAN PLANNING AREA



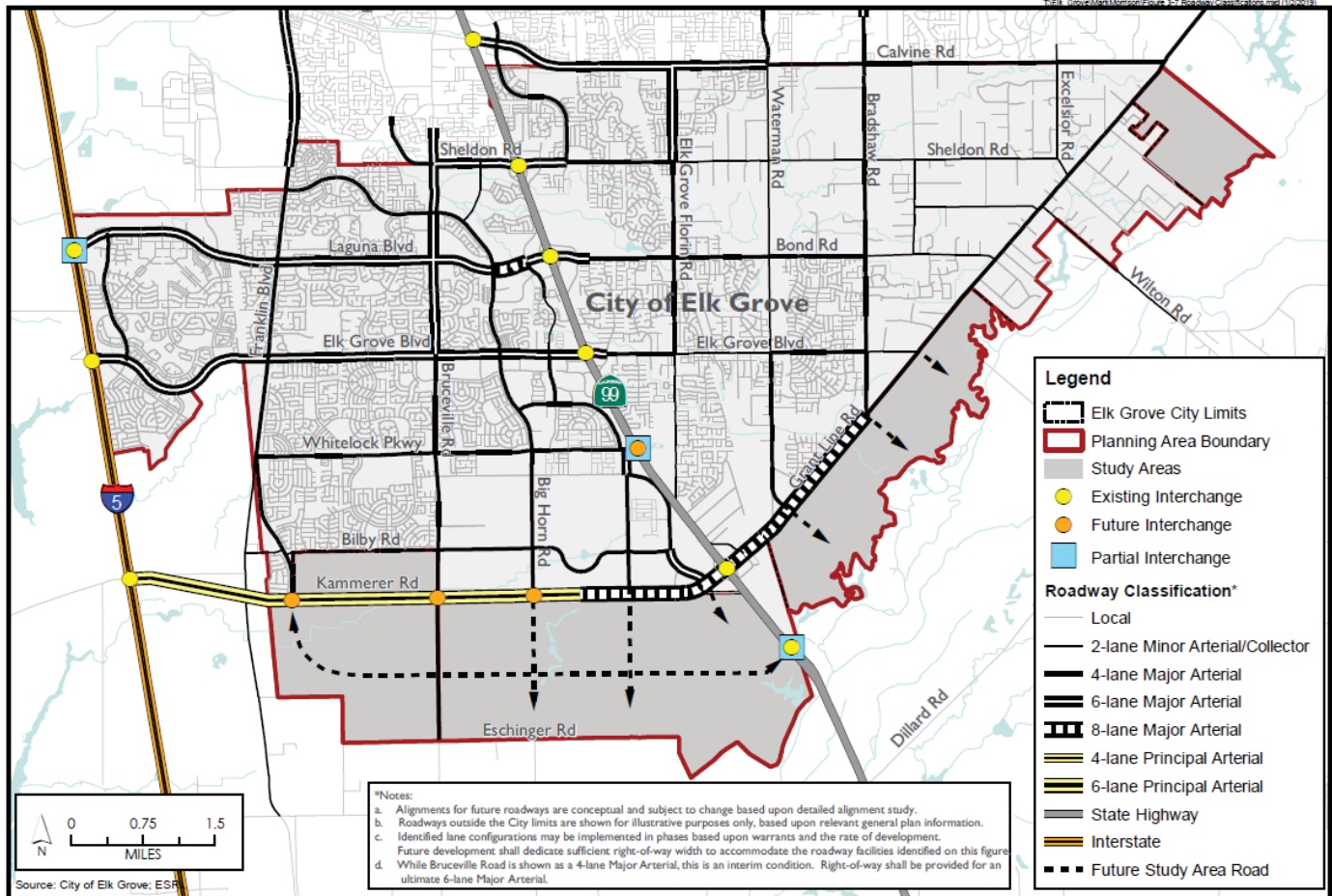
REVISED FIGURE 3-4: LAND USE DIAGRAM
 (Note, figure 3-2 to be updated to reflect this exhibit)



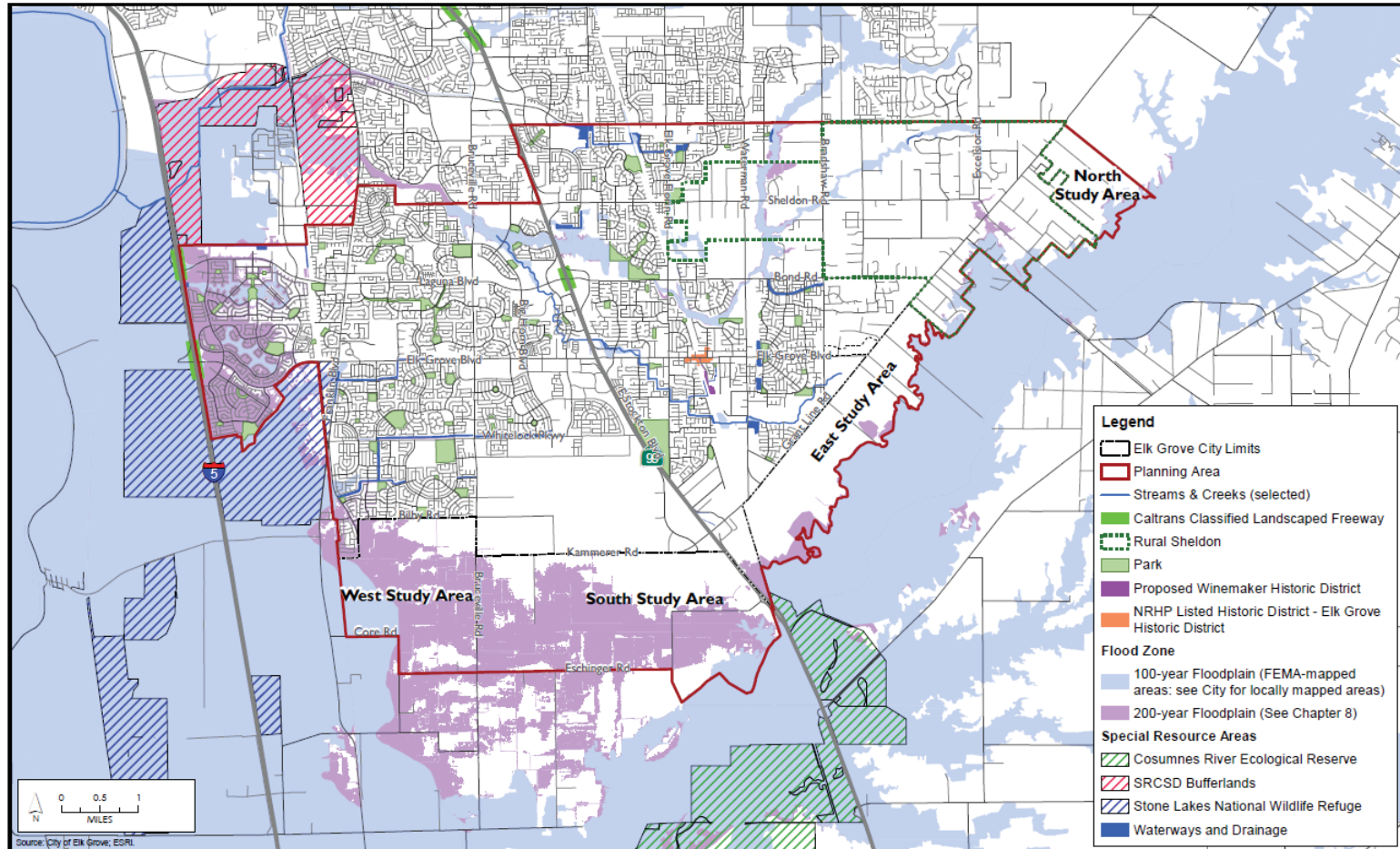
REVISED FIGURE 3-6: TRANSPORTATION NETWORK DIAGRAM



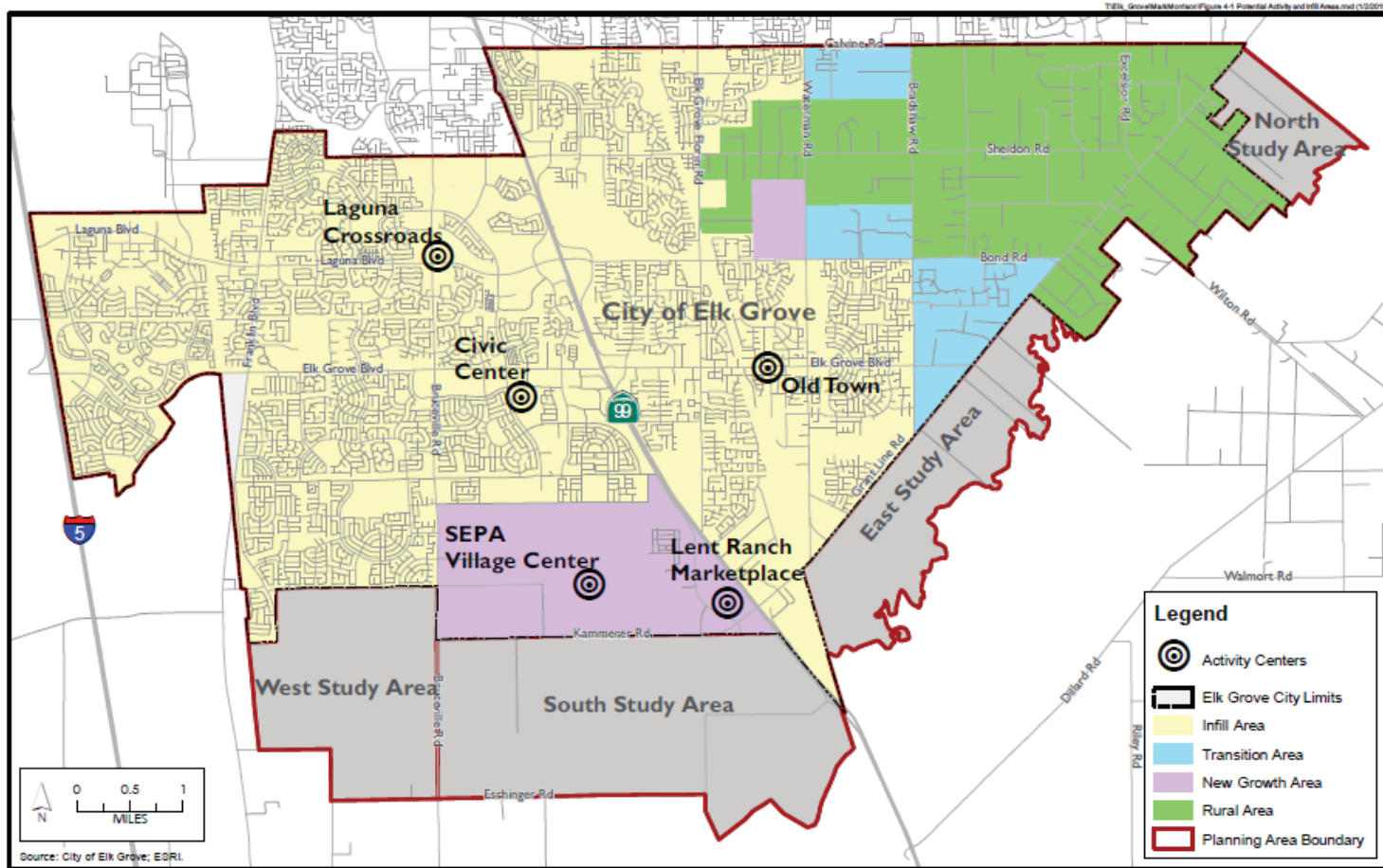
REVISED FIGURE 3-7: ELK GROVE ROADWAY CLASSIFICATIONS



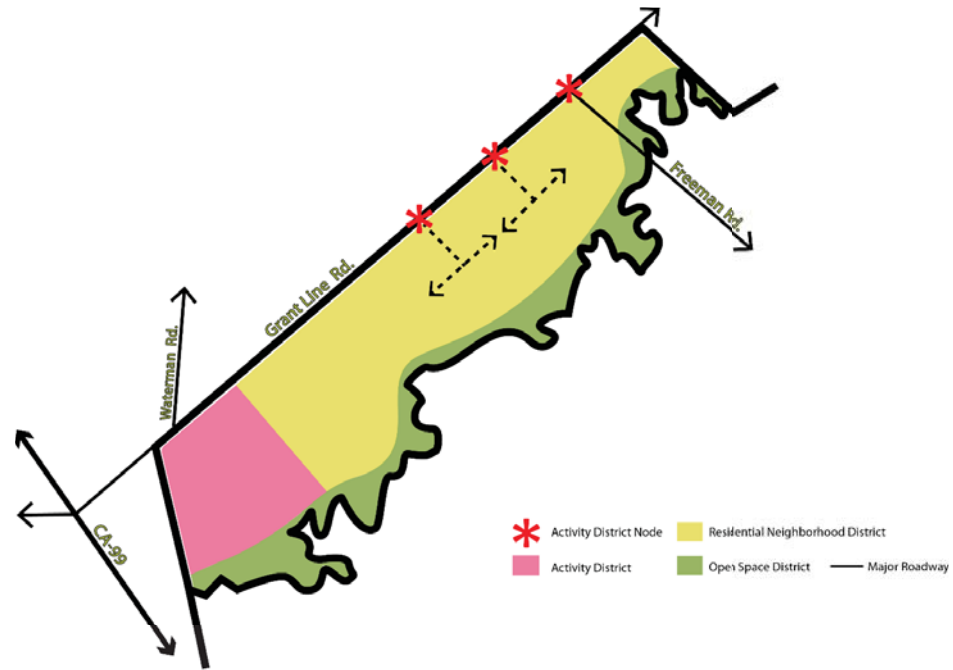
REVISED FIGURE 3-8: RESOURCE CONSERVATION DIAGRAM



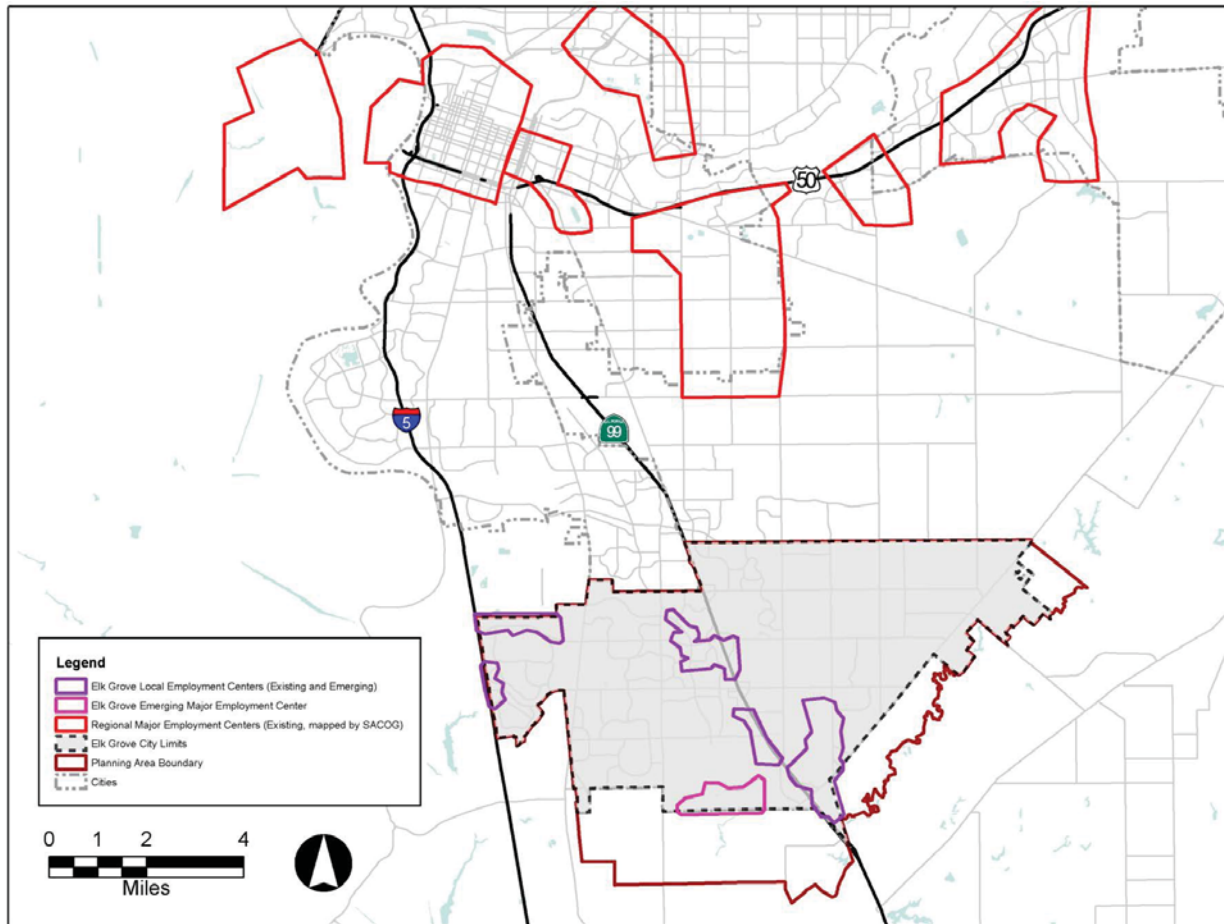
REVISED FIGURE 4-1: POTENTIAL ACTIVITY AND INFILL AREAS IN ELK GROVE



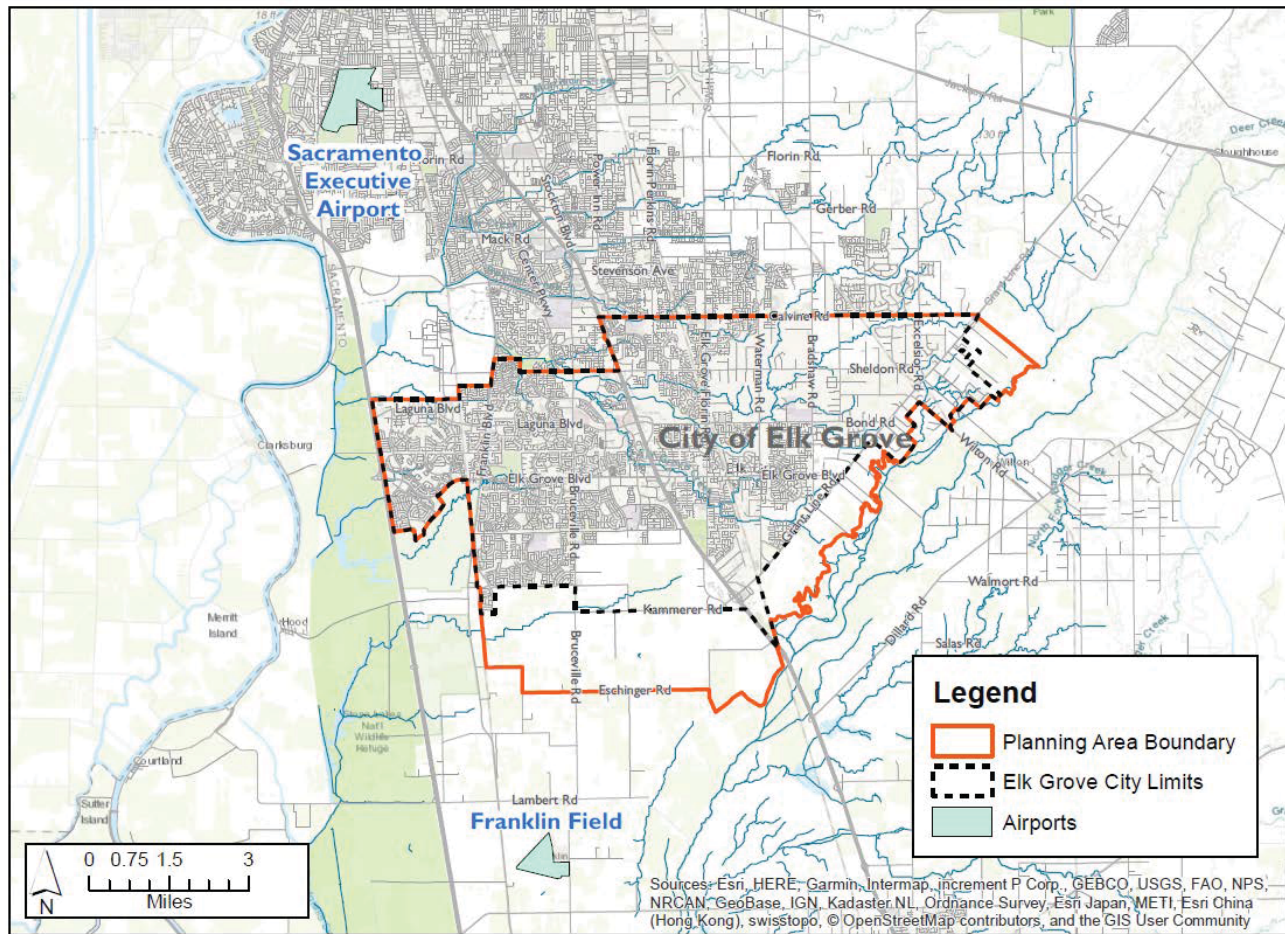
REVISED FIGURE 4-6: EAST STUDY AREA LAND USE DIAGRAM



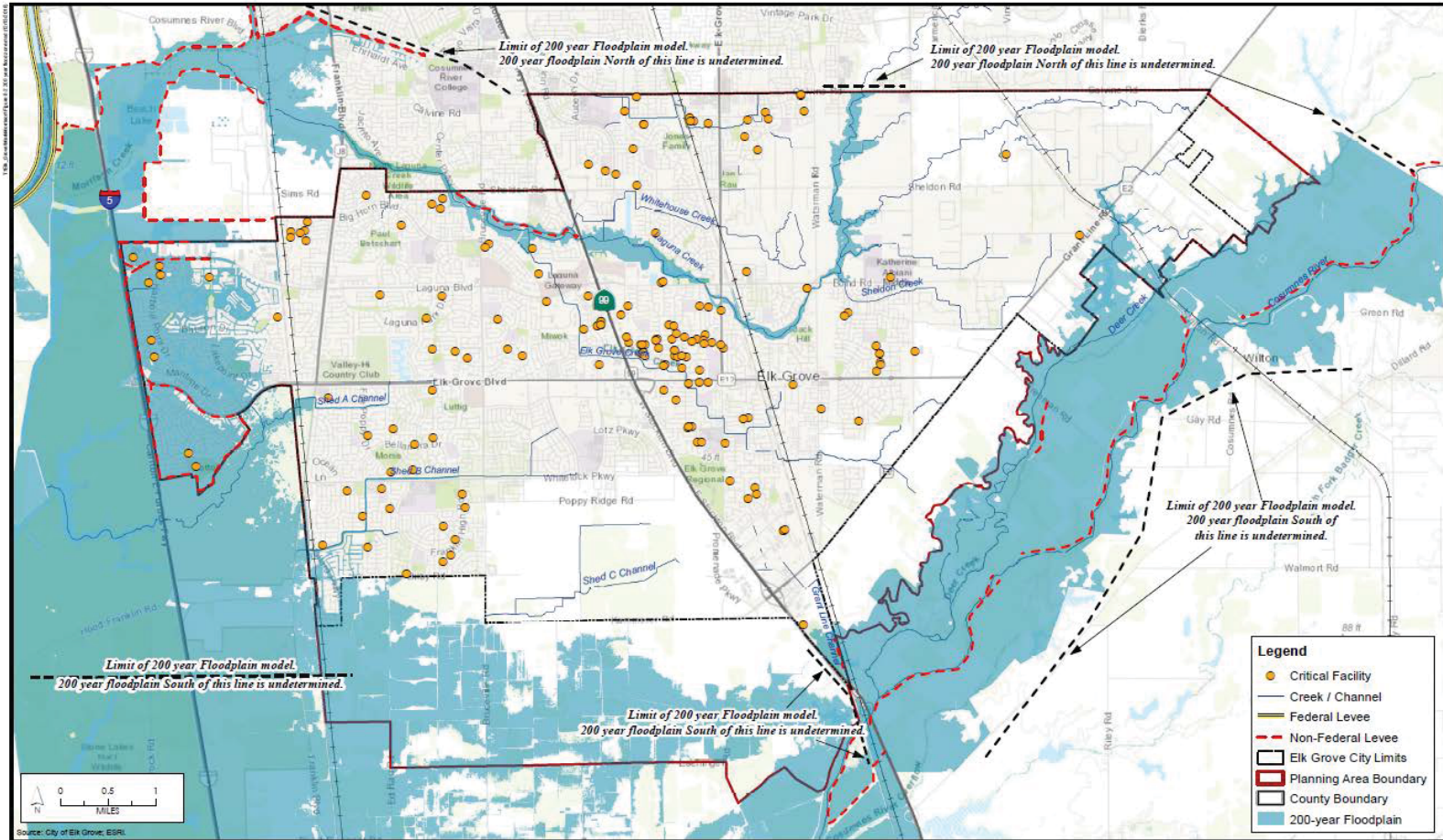
REVISED FIGURE 5-2: EXISTING AND EMERGING EMPLOYMENT CENTERS



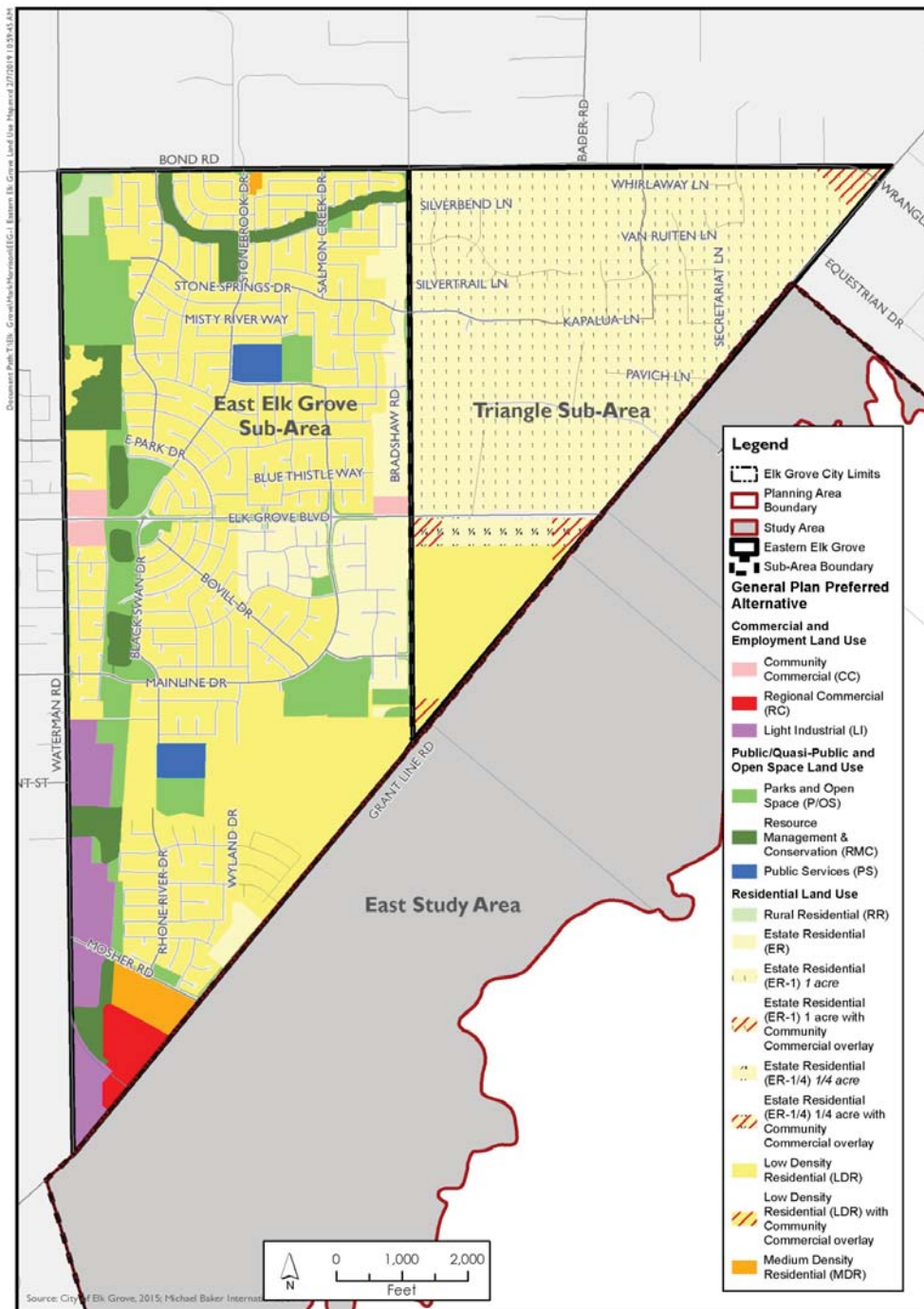
NEW FIGURE 6-1: AVIATION FACILITIES NEAR ELK GROVE



REVISED FIGURE 8-2: 200-YEAR FLOODPLAIN ZONES



REVISED FIGURE EEG-1: EASTERN ELK GROVE LAND USE MAP



ATTACHMENT 3

General Plan Update - Public Comment Tracking Sheet - As of January 4, 2019

Elk Grove General Plan Update - Public Comment Log - As of January 4, 2019					
Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
GENERAL PLAN - GENERAL					
1	Lynn Wheat, Resident	General Plan	Email to City re: PC Workshop #2, September 20 2018	I have concerns regarding the General Plan update process and the documents being completed at the same time. Navigating through both documents I believe there are better policies available to address the significant impacts. The meeting Monday night demonstrated to me again the policies of our city council are not matching the of the residents. I feel bad for the people living in the triangle who are not protected by any land use policies with past and present land use decisions lead by Ms. Rezone and Mr. General Plan Amendment. What happen to the days when land development was speculative and business people took risks? Or that zoning and land use maps really meant something?	Comment noted.
2	Sharon Lynes, Resident	General Plan	Oral comment, Planning Commission Workshop #1, September 6 2018	Appreciate the quality of the hard copy document. Easy to navigate and flip pages.	Comment noted.
TABLE OF CONTENTS					
3	Sharon Lynes, Resident	Table of Contents	Oral comment, Planning Commission Workshop #4, October 18 2018	V in Table of Contents. Incorrect reference to page number – need to update. Some are ok – others are not.	The table of contents will be updated as necessary to reflect the repagination as a result of changes to the document.
CHAPTER 2: VISION					
4	Hollis Erb, Resident	General Plan Chapter 2	Oral comment, Planning Commission Workshop #1, September 6 2018	Vision statement – too generic. Nothing that ties the statement to Elk Grove specifically.	The vision statement has been reviewed by the Planning Commission and City Council and no changes are proposed
5	Suzanne Pecci, Resident	General Plan Chapter 2	Oral comment, Planning Commission Workshop #1, September 6 2018	Vision statement pics are in City of Galt [supporting principle pic].	This picture has been updated. See revision 11.
6	Lynn Wheat, Resident	General Plan Chapter 2	Oral comment, Planning Commission Workshop #1, September 6 2018	Open Space and Resource Management Supporting Principle – better commitment to regional parks and a trail system. Mobility Supporting Principle – better coverage to expansion area and amenities like bus shelters. Sustainable and Healthy Community Supporting Principle – be more thoughtful in design (e.g., rain park). Economy and the Region Supporting Principle – better commitment to future redevelopment opportunities (ref. AB 3037).	Staff has reviewed and made adjustments to some of the supporting principles. See revision 12.
7	Kevin Spease, Planning Commissioner	General Plan Chapter 2	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Potentially integrate more “place” in the supporting principles.	Staff has reviewed and made adjustments to some of the supporting principles. See revision 12.
8	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 2	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Want more bulk in the vision and supporting principles.	Staff has reviewed and made adjustments to some of the supporting principles. See revision 12.
CHAPTER 3: PLANNING FRAMEWORK					
9	Sharon Lynes, Resident	General Plan Chapter 3, Page 3-10	Letter to City (No Date)	The words “curbs and gutters” should be added to the paragraphs referring to the rural area Under Rural Area Preservation (3-10).	The first paragraph under Rural Area Preservation has been updated to include this reference. See revision 14.
10	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 3, Pages 3-19 and 3-21 to 3-22	Oral comment, Planning Commission Workshop #2, September 20 2018	Allowing Estate Residential (1-4 du/ac) – not consistent with rural area. Suggest Estate 1 du/ac only in rural area.	The Rural Residential General Plan designation includes the AR-10 through AR-2 zones, consistent with existing General Plan policies. Likewise, the Estate Residential General Plan Designation includes the AR-1 through RD-4 zones, also consistent with the current General Plan. No changes are proposed.
11	Derek Minnema, Executive Director, Capital SouthEast Connector JPA	General Plan Chapter 3, Pages 3-32 and 3-35	Letter to City, October 3 2018	Per the City of Elk Grove’s 2015 General Plan - Circulation Element, the Capital SouthEast Connector Expressway (Connector) is identified in Figure CI-2: Master Plan of Roadways. The Connector is also identified in Circulation Policies CI-10 and CI-12, which requires the Connector to be considered with future roadway improvements and includes City supported efforts to develop the Connector in conjunction with the JPA. Although the 2018 Draft General Plan requires consideration of the Connector with future roadway improvements and continued City support to develop the Connector, the roadway network maps do not specifically identify the Connector. Please specifically depict the Connector on the City’s roadway network.	Revise Figures 3-6 and 3-7 to show alignment of Capital SouthEast Connector. See revision 19.
12	Sharon Lynes, Resident	General Plan Chapter 3, page 3-18	Oral comment, Planning Commission Workshop #3, October 4 2018	Add curb and gutter to reference to sidewalks	See comment #9
13	Sharon Lynes, Resident	General Plan Chapter 3, Pages 3-19, 3-21 and 3-22	Oral comment, Planning Commission Workshop #3, October 4 2018	More AR-1 from Estate to Rural	AR-1 is a minimum one-acre lot size. This would be inconsistent with the minimum lot size for the Rural Residential. No changes are proposed.

General Plan Update - Public Comment Tracking Sheet - As of January 4, 2019

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
14	Sharon Lynes, Resident	General Plan Chapter 3, Page 3-19	Oral comment, Planning Commission Workshop #3, October 4 2018	RD-1 – not really an acre – ER should only be 2, 3, 4	AR-1 is a minimum one-acre lot size. This would be inconsistent with the minimum lot size for the Rural Residential. No changes are proposed.
15	Sharon Lynes, Resident	General Plan Chapter 3, Page 3-20	Oral comment, Planning Commission Workshop #3, October 4 2018	Pg. 3-20: Footnote (a) includes RM-1 – is that really applicable to all?	Yes. This is consistent with the existing General Plan. No changes are proposed.
16	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-3	Written comment	Last paragraph discusses development in the future study areas. How will community benefit or need be determined? Where is this defined or sited?	See policy LU-3-24 relative to community benefit.
17	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-4	written comment	Last paragraph "there will be older commercial corridors where reinvestment can benefit and enhance community." Where are these areas located on the maps? How will benefit and reinvestment be determined?	This may include, but are not necessarily limited to, Elk Grove Florin Road between Bond Road and Elk Grove High School, and Elk Grove Boulevard between SR-99 and Old Town. Clarification will be added to the sentence. See revision 13.
18	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-8 and 3-9	written comment	Estate and low density colors are so close difficult to differentiate on the map.	Noted. Staff will look at adjusting the color schema. This is a composite graphic. See Figure 3-4 for better coloring.
19	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-21 and 3-22	written comment	The Land Use Diagram (Figure 3-4) does not contain any land use designations for the future Study Areas. And yet, Table 3-2 (General Plan Development Capacity) makes assumptions on the maximum number of dwelling units and jobs for each Study Area. My concern is that the future development within each Study Area will be measured by consistency with these arbitrary density limits, irrespective of the spatial distribution and relationships of land uses. In addition, the environmental carrying capacity of each Study Area needs to be analyzed. It is clear that this General Plan Update is the appropriate time to include land use diagrams for each Study Areas in Figure 3-4 as a policy guidance for future speculation and should not be the basis for findings of consistency for future development projects. The General Plan Figure 3-4 needs to describe the methodology for determining maximum jobs for "General Plan total" and each Study Area. Why is it no jobs are being projected for the North Study Area? It can be concluded that the North Study Area will be exclusively residential, but where is the General Plan policy guidance/public input that allows this to happen? Figure 3-4 is being improperly used as a land use policy tool without being shown on the Land Use Diagram.	The land use plans for the study areas are not set with the land use plan for the General Plan. Rather, the figures in Chapter 4 provide an overview of the organizing principles and conceptual diagrams of the future land planning. Details of the land planning are reserved to future planning efforts. This was a point of discussion during development of the General Plan and reflects City Council direction. The carrying capacity of the study areas is included in Table 3-2 and reflects the range of land uses provided in Tables 4-1 through 4-4. Those acreage numbers are converted to building square footage based upon the Floor Area Ratio allowances in by land use type in Chapter 3, and then divide by a ratio of square foot per employee based upon land use type using industry standard rates derived from parking studies conducted nationally. The North Study Area does not include jobs uses based upon Council direction.
20	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-21 and 3-22	written comment	What is the basis for determining the ratio of jobs in the Employment Center designation, versus total jobs in the future study areas? The General Plan describes office/professional as the typical job in the Employment Center area, but what about the Study Areas? Retail jobs supporting the residential development? If so, this is adequate from a tax base/economic development standpoint and less reliance on sales tax as a revenue source?	The carrying capacity of the study areas is included in Table 3-2 and reflects the range of land uses provided in Tables 4-1 through 4-4. Those acreage numbers are converted to building square footage based upon the Floor Area Ratio allowances in by land use type in Chapter 3, and then divide by a ratio of square foot per employee based upon land use type using industry standard rates derived from parking studies conducted nationally.
21	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-21 and 3-22	written comment	Based on 3.23 persons per household. - How was this number determined? Many residential homes are being built for multigenerational families which increases population density in neighborhoods.	This is based upon Census data released annually under the American Community Survey. See data tables B25032 and B25033. It is based upon Elk Grove's specific demographics.
22	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-27	written comment	This addresses disadvantaged communities, however how about blighted neighborhoods that are not disadvantaged but neglected such as roads, sidewalks, and public areas?	Government Code Section 65302(h) addresses this requirement. The draft General Plan is compliant.
23	Lynn Wheat, Resident	General Plan Chapter 3, page 3-30	written comment	Line spacing 1st paragraph	Noted. This will be addressed in the final printing. See revision 18.
24	Lynn Wheat, Resident	General Plan Chapter 3, page 3-34	written comment	Trail along Watershore Parkway...location? Or it is Whitelock Parkway?	This is a spelling error and will be corrected. Whitelock Parkway is correct. See revision 20.
25	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-39	written comment	This page describes the SSHCP as a regional approach to addressing issues related to urban development habitat conservation and agriculture protection. However, the City withdrew its participation from that regional plan and has approximately 8,000 acres of regional future study areas pending in its sphere of influence. Assuming the SSHCP has no jurisdiction within the Elk Grove Spheres, how can the General Plan assure that the City will be a similar steward of those concerns? The General Plan needs to describe the mitigation measures in place by the City to address each of those three.	This section will be updated to note that the SSHCP has been adopted. The SSHCP does not have any jurisdiction within the existing City limits. If the City annexes land that is within the SSHCP, and provided the land in question is within the "urban development area" (the permit area) of the SSHCP, the SSHCP may be used for mitigation. Nothing in the SSHCP compels someone to use the SSHCP as the mitigation program. Given that the majority of the mitigation issues in the City surround Swainson's hawk habitat and nest sites, it is likely that mitigation outside the SSHCP will be a more viable option. Policy LU-3-22 calls for the City to establish a mitigation program for potential impacts. See revision 21.
26	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-39	written comment	"Feathering" This is an approach that is questionable in effectiveness in preserving areas especially with the flexible zoning. Define buffering and feathering.	Feathering refers to the staged reduction in densities and intensities of land use in the transition from a high density/intensity area to a low density/intensity area. Buffering is the setting aside of open space or other undeveloped and/or landscaped area between land uses. A grey box defining these terms will be added to the margin. See revision 22.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
27	Lynn Wheat, Resident	General Plan Chapter 3, Page 3-39	written comment	The General Plan sets a target of 5.36 acres of parkland per 1,000 residents. However, the General Plan needs to address what types of lands can qualify as "parkland". Are floodplains, drainage basins, detention basins, and overhead power line easements counted towards that parkland calculation?	Parkland may only be active park space. It may not include trails, drainage area, landscape corridors, or other passive areas. This is defined EGMC 22.40 and in the Park Design Principles.
CHAPTER 4: URBAN AND RURAL DEVELOPMENT					
28	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-4	Letter to City (No Date)	Inclusionary housing should be a goal to prevent economic segregation	The City Council has not provided direction on changes to the City's housing policies on this matter. No changes proposed.
29	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-12	Letter to City (No Date)	Job Creation section relies on Elk Grove's historical bedroom community role to tout "commercial, office, and retail uses" as satisfactory jobs to "increase the jobs/housing ratio." This is misleading. Total square footage of those types of job sectors is based on a certain ratio of population/ housing units. Assuming the local market is at equilibrium, how is future jobs/housing any different than it is currently? This ignores internet commerce trend that is shifting equilibrium ratio. Section Jobs and Housing Needs - "adding new jobs without adding new housing could be problematic" sums up the conclusion that more of the same will be the land use pattern of the city going forward- Rooftops and Retail. I am opposed to this from a policy standpoint.	Comment noted.
30	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-13	Letter to City (No Date)	Preserving agriculture and encouraging farmer by implementing concepts from Land Based Learning Institute allowing small farming on vacant plots within our urban area. Promote or encourage use of individualized infill properties for the production of farming of locally grown food for use by local businesses.	Staff is looking at revisions to the allowed use provisions for crop production and may propose changes at a future date.
31	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-15	Letter to City (No Date)	Policy LU-1-7. The city has a poor track record of disclosing potential land use compatibility issues to existing residents. The draft policy merely lists examples of physical, environmental incompatibilities. However, the abundance and willingness of the City Council to rezone/GPA properties to meet current market demands of applicants and the broad range of land uses in the flex-zones requires more aggressive outreach. Recommend expanding mailing radius notification beyond the minimum required by State law, and including project description information on the pending development signs posted on the property being considered for development.	The City's current notification radius is a minimum of 500 feet (1,000 feet in rural areas). These are both more than the State minimum of 300 feet. The City also posts a notice on-site when an application is submitted. This is not a requirement under State law.
32	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-16	Letter to City (No Date)	Policy LU-2-2: Define "investing in public infrastructure." Clarify if investing means use of taxpayer funds for infrastructure that is typically funded by developers. Clarify what "public" infrastructure means, as opposed to private infrastructure? When ever the city "fronts" the cost of infrastructure, it should disclose to the public the projected payback schedule based on development market trends, much in the way bond underwriters do for investors.	Public infrastructure includes, but is not limited to, roadways, water and sewer lines, and electrical and gas services. May also include conduit for telecommunication services along arterial roadways. The City has invested in these types of facilities through plan preparation, permit application, and construction through the use of development impact fees and bond proceeds from new development. How the City implements the policy in the future will be at the direction of the City Council at that time.
33	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-16	Letter to City (No Date)	Expansion with purpose. This section needs to first justify expansion based on SACOG growth projections for the region and the City's fair share. If not, then the text needs to acknowledge that the basis for urbanization of the Study Areas is the perceived market demand of any given landowner and may ultimately be growth- inducing. The city policy shall be to pre-zone all of the study areas in a matter that assures consistency with the General Plan vision, rather than reacting to piecemeal annexation/development applications. In other words, the city needs to assert its vision, rather than suggesting in the text that the city waits for applications, and a General Plan amendment may be required if it is not consistent with the City's vision. We know how that story ends. Before expanding out into the study areas determine and describe the percentage of infill needing to be built upon and developed. Before expanding out into the study area determine and describe the percentage of properties that have completed revitalization.	SACOG growth projections are based on, among other things, local general plans. The growth projections represent a projection for a point in time. The draft General Plan for Elk Grove does not assign a buildout year or other form of time horizon. Policy LU-3-20 requires rezoning to be consistent with the General Plan. Policy LU-3-27 requires, among other things, a market study that includes an analysis of available lands in the existing City limits. The comment appears to suggest that the City should undertake the master planning for new growth area sites, rather than wait for private applications. Nothing in the policies prohibits that from occurring; however, if this is the only approach to planning the areas that the City desires to undertake additional policies could be drafted at the direction of the City Council. No changes are proposed.
34	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-17	Letter to City (No Date)	SEPA infrastructure, residents prepaid for the infrastructure to the first development of the project; housing with expected reimbursement in the future. The reimbursement or mitigation fees may not be enough. Policy need to be established that residents are not paying for infrastructure into the study areas until maintenance of existing infrastructure is fully funded and addressed.	Infrastructure within SEPA is only sized to accommodate SEPA, other portions of the existing City (Laguna Ridge) and a small area outside the City but within the County Urban Service Boundary. No infrastructure is being constructed that will serve areas south of Kammerer Road. No changes are proposed.
35	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-21	Letter to City (No Date)	Land for the Elementary schools and parks should be within residential areas and not along the main arterial roads.	Noted. Staff has drafted revisions as provided in revision 39. Revisions are based upon the CCSD/City Park Design Principles.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
36	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-19	Letter to City (No Date)	Activity District General Components. The statement, "each activity district will have one or more activity nodes, which represent the center of commercial or employment uses, typically located at a major intersection or near a transit stop" pretty much sums up the continued suburban style development that already exists in the city. Not innovative at all.	This statement follows many of the New Urbanist principles (e.g., neighborhoods with discernible centers, most dwellings within a five-minute walk of the center, variety of dwelling types, playgrounds accessible to every dwelling, streets within the neighborhood form a connected network), including the traditional neighborhood structure. No changes are proposed.
37	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-20	Letter to City (No Date)	LU-3-2 assumes significant use of transit. Other appropriate chapters of the General Plan need to commit to developers incorporating sheltered transit stops/bus bays into their development plans.	Bus stops/shelters are required in new development today. No changes are proposed.
38	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-21	Letter to City (No Date)	Policy LU-3-4 needs to clarify what is meant by buffering housing via building design from loud uses that frequently exceed 65 decibels. Do the homes along the railroad tracks off of Billy demonstrate this? The height of the sound wall did not take into account the grade difference and the windows are above wall level.	A number of design options exist to address noise impacts, including walls, landscaping, buffer areas, triple pane windows, increased insulation, and other building techniques. No changes are proposed.
39	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-24	Letter to City (No Date)	Policy LU-3-9. Specify whether Open Space/Conservation Districts are specifically intended to be in public ownership. If so, then why have all 100 and 200- year floodplains be the responsibility of the public? Need to expand discussion of private and public ownership. Need to define how acreages of parks are calculated/credited (i.e. drainage ways? retention basins? etc.)	Some areas may be publically owned; others may be privately owned. It depends on the circumstances. No changes proposed.
40	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-26	Letter to City (No Date)	Study Area Land Use Programs. The required Land Use Programs for the Study Area need to include identifying all major infrastructure needs and financing methods to facilitate the plan.	At this stage preparing infrastructure and financing plans is infeasible. That occurs through the master planning process as provided in policies including, but not limited to, LU-3-26, LU-3-27, and LU-3-32. No changes proposed.
41	Lynn Wheat, Resident	General Plan Chapter 4, Pages 4-29-30	Letter to City (No Date)	Policy LU-3-13 appears to create land use/noise conflicts between Residential Neighborhood and the future Connector. Table 4-2 shows two land use districts with overly broad permitted land uses and overlap, so as to make these distinctions irrelevant from a public policy standpoint. In other words, the soccer field can give way to regional commercial, heavy industry, or high density housing, and the Residential Neighborhood District which according to LAFCo was supposed to support the soccer field can be anything from Rural residential to high density residential. Desired Land Use Range should convert percentage to estimate acreage to help readability and tracking over time. This Table is not reflective of sound planning policies for the East Study Area.	Figure 4-6 will be corrected to remove the overlap. This figure is a conceptual diagram. Details regarding buffers from roadway noise and other impacts are addressed through the master planning process. No additional changes are proposed. See revision 44.
42	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-32	Letter to City (No Date)	Table 4-3, Desired Land Use Range should convert percentage to estimate acreage to help readability and tracking over time. Eschinger Road appears to be considered as a major arterial with access to State Route 99 in the future. If so, A similar Activity District should be placed along Eschinger as well.	Comment regarding acreages noted and acreages will be added. See revisions 45, 46 and 47. Eschinger Road currently connects to SR-99. As illustrated in the figure, Willard Parkway is envisioned as extending through this study area and providing the connection to SR-99 in the future. Given the proximity to Kammerer Road (to the north) and the Cosumnes River/Deer Creek (to the south) staff does not recommend an activity node at the noted location.
43	Lynn Wheat, Resident	General Plan Chapter 4, Pages 4-33 to 4-34	Letter to City (No Date)	West Study Area. Extend the Activity District along the entire stretch of Bruceville, a planned major arterial, in order to avoid those land conflicts cited elsewhere in the chapter. Table 4-4 Desired Land Use Range should convert percentage to estimate acreage to help readability and tracking over time.	Staff does not recommend the change to the activity district along Bruceville because it will promote conversion of agricultural lands south of Eschinger Road. As envisioned and discussed at prior City Council meetings, the area north of Eschinger will provide a transition to the commercial agriculture south of Eschinger. The proposed conceptual land use diagram illustrates this concept. No changes are proposed.
44	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-35	Letter to City (No Date)	LU-3-20, clarify that the pre-zoning process will be initiated by the city and be comprehensive for the entirety of each Study Area prior to any annexation application within that Study Area, and include public outreach.	As drafted the rezoning would occur through master planning, which typically begins with a private party application. Nothing in the policies prohibits the City from initiating the master planning process; however, if this is the only approach to planning the areas that the City desires to undertake additional policies could be drafted at the direction of the City Council. No changes are proposed.
45	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-36	Letter to City (No Date)	LU-3-23, clarify that if additional lands are considered for annexation, such processing costs shall be borne by the affected property owner(s).	Annexation proceedings are project costs charged to development applications. No changes are proposed.
46	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-37	Letter to City (No Date)	LU-3-27, include a full environmental analysis questionnaire patterned after the CEQA Initial Study to be completed and submitted with all annexation applications. Financing Plan and Fiscal Analysis, this section should include policy discussion that if backbone infrastructure financing is needed, the City may entertain issuance of tax exempt bonds for the benefit of the master developer, but that all properties within the benefit area will be responsible for bond payment, developed or undeveloped, from the date of bond issuance.	An environmental analysis questionnaire is included in the development application; however, more detailed studies are often required through the CEQA process. If bonds are issued for a project the bonds would need to be consistent with the City's guidelines. Additionally, the bond market may not accept large amounts (e.g., greater than 50% of overall land area participating in the bond issuance) of undeveloped property as the basis for bond issuance. No changes are proposed.
47	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-41	Letter to City (No Date)	LU-5-5, develop a policy to develop enhanced citywide design guidelines to serve as a baseline for architectural quality that is to be on par with some of the leading urban areas of the Sacramento/Placer county region.	This is an action item included in Chapter 10. No changes are proposed.
48	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-45	Letter to City (No Date)	Where is South Pointe?	South Pointe is the historic policy area name for what is now Sterling Meadows. No changes are proposed.

General Plan Update - Public Comment Tracking Sheet - As of January 4, 2019

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
49	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-48	Letter to City (No Date)	Goal H-1, Cite the SACOG document that estimates the need for 7,402 housing units in Elk Grove by 2021.	See https://www.sacog.org/regional-housing-needs-allocation-rhna . No changes are proposed.
50	Hollis Erb, Resident	General Plan Chapter 4, Page 4-19	Letter to City (No Date)	Request that text be amended per my highlighting added: "Policies: Activity District General Components The Activity District includes higher densities and intensities of retail, services, employment, and residential uses. Activity Districts should be linked and supported by an interconnected network of streets and open spaces, with residential uses located within walking distance, facilitating options such as transit, biking, and walking for access to services and to the Residential Neighborhood District areas. Figure 4-4 illustrates how various land uses and public spaces (e.g., streets) are intended to work together to implement this concept. This graphic is included primarily for illustrative purposes and does not reflect any specific development proposal. Each Activity District will have one or more activity nodes, which represent the center of commercial or employment uses, typically located at a major intersection or near a transit stop.	Included in comment 51 below.
51	Hollis Erb, Resident	General Plan Chapter 4, Page 4-19	Letter to City (No Date)	FIGURE 4-4: concern is that the ONLY parks/open space are suggested to be in the LDR districts rather than next to the HDR—i.e., the folks who will have the LEAST private yard space. I do not mean that no parks should be in LDR; rather the denial in the "illustration" of very close parks for the MDR and HDR residents could be raised as an issue of social justice (and certainly compromises the average distance of residents to a park). Preference to make this illustrations like p. 9-9, Fig. SEPA-1 or p. 9-29 Fig. EEG-1. In these latter designs, green space clearly is better distributed, with immediate access for those who live in the densest areas.	Staff has reviewed and made adjustments to park footnote to clarify. See revision 38.
52	Sharon Lynes, Resident	General Plan Chapter 4, Page 4-8	Letter to City (No Date)	The words "curbs and gutters" should be added to the paragraphs referring to the rural area under Neighborhoods and Community Character (4-8).	This revision has been incorporated. See revision 26.
53	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 4, Page 4-22	Oral comment, Planning Commission Workshop #2, September 20 2018	Supports buffering between agricultural and residential land uses.	Noted. No changes proposed.
54	Shirley Peters Resident	General Plan Chapter 4, Page 4-22	Oral comment, Planning Commission Workshop #3, October 4 2018	Add in open space buffers or Estate Residential between rural and urban development. Use only ER-1 delete low density (see pg. 4-22). Confirm this is only in the Study Areas and does not apply in the Rural Area.	This policy only applies in the Study Areas and does not apply to the Sheldon Rural Area. No changes are proposed.
55	Shirley Peters Resident	General Plan Chapter 4, Page 4-24	Oral comment, Planning Commission Workshop #3, October 4 2018	Buffer between industrial and residential uses. Also provide buffers on AR developments. Confirm this is only in the Study Areas and does not apply in the Rural Area.	This policy only applies in the Study Areas and does not apply to the Sheldon Rural Area. No changes are proposed.
56	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-4	Oral comment, Planning Commission Workshop #3, October 4 2018	Inclusionary housing should be a goal.	Noted. No changes proposed.
57	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-11	Oral comment, Planning Commission Workshop #3, October 4 2018	Identify need for Special Planning Areas to require greater public benefit.	Noted. Staff has drafted revisions to the paragraph. See revision 29.
58	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-13	Oral comment, Planning Commission Workshop #3, October 4 2018	Preserve ag by using underserved/underdeveloped property to allow community gardens/farms in interim.	Staff is looking at revisions to the allowed use provisions for crop production and may propose changes at a future date.
59	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-15	Oral comment, Planning Commission Workshop #3, October 4 2018	Policy LU-1-7 Concerned about level of notification. Amend notification to expand radius and add project description to on-site notice.	The City's current notification radius is a minimum of 500 feet (1,000 feet in rural areas). These are both more than the State minimum of 300 feet. The City also posts a notice on-site when an application is submitted. This is not a requirement under State law.
60	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-16	Oral comment, Planning Commission Workshop #3, October 4 2018	Policy LU-2-2 Investing = tax payer infrastructure? Clarify. Clarify public infrastructure.	Public infrastructure includes, but is not limited to, roadways, water and sewer lines, and electrical and gas services. May also include conduit for telecommunication services along arterial roadways. The City has invested in these types of facilities through plan preparation, permit application, and construction through the use of development impact fees and bond proceeds from new development. How the City implements the policy in the future will be at the direction of the City Council at that time.
61	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-16	Oral comment, Planning Commission Workshop #3, October 4 2018	Need to assure the expansion is based on SACOG projections.	SACOG growth projections are based on, among other things, local general plans. The growth projections represent a projection for a point in time. The draft General Plan for Elk Grove does not assign a buildout year or other form of time horizon. Policy LU-3-20 requires rezoning to be consistent with the General Plan. Policy LU-3-27 requires, among other things, a market study that includes an analysis of available lands in the existing City limits. The comment appears to suggest that the City should undertake the master planning for new growth area sites, rather than wait for private applications. Nothing in the policies prohibits that from occurring; however, if this is the only approach to planning the areas that the City desires to undertake additional policies could be drafted at the direction of the City Council. No changes are proposed.
62	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-	Oral comment, Planning Commission Workshop #3, October 4 2018	City should commit to periodic review of impact fees.	The City reviews its impact fees approximately every five years, consistent with State law.
63	Lynn Wheat, Resident	General Plan Chapter 4, Page 4-	Oral comment, Planning Commission Workshop #3, October 4 2018	Elementary and parks in residential neighborhoods. Use CCSD terminology for parks in this plan for consistency.	The General Plan is consistent with the Parks Design Principles prepared by the City and CCSD Parks.

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64	Suzanne Pecci, Resident	General Plan Chapter 4	Oral comment, Planning Commission Workshop #3, October 4 2018	Requests clarification between "rural" and "agriculture".	Rural refers to the rural area of the City (i.e., the Sheldon Rural Area). Agriculture refers to agricultural operations. No changes proposed
65	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-22	Oral comment, Planning Commission Workshop #3, October 4 2018	Policy LU-3-7: Needs more consideration of buffers (related to ag) and right-to-farm practices. Buffer means actual screening, actual distance. Should set minimum standards.	Pursuant to prior City Council direction, this and other similar policies identify the need for buffering and identify a range of solutions that may occur. Ultimate design and requirements for the buffering will be established as part of project review.
66	Suzanne Pecci, Resident	General Plan Chapter 4	Oral comment, Planning Commission Workshop #3, October 4 2018	Wants more open dialogue about potential expansion impacts on existing residents.	Various policies address or otherwise require analysis of potential project impacts on the existing City, including but not limited to LU-3-26, LU-27, LU-3-31, and LU-3-32. No changes are proposed.
67	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-5	Email to City re: PC Workshop #3, October 4 2018	Do not link the last sentence of the paragraph - create two separate sentences as "rural neighborhoods are not where agricultural production occurs and not where agritourism will occur—it will occur on agriculture lands where crops are grown and not in rural neighborhoods which is an ag residential neighborhood.	Based upon Planning Commission discussion at the September 6, 2018 workshop, no changes are proposed.
68	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-6	Email to City re: PC Workshop #3, October 4 2018	Elk Grove historically was a farming community, which in more recent years became a "bedroom community"	Comment noted.
69	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-7	Email to City re: PC Workshop #3, October 4 2018	Figure 4-1 Potential Activity and Infill Areas in Elk Grove- I don't remember the community deciding this would be a transition area—transition to what? Will the transition area require wet services—sewer and water?	The transition area identify areas that transition from the more urban areas of the City to the rural area. Staff has drafted additional language for the Neighborhoods and Community Character discussion on page 4-8 to help clarify this. See revision 27.
70	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-8	Email to City re: PC Workshop #3, October 4 2018	What does it mean that the "city embraces Greenfield development as strategy.....that benefits what community? It is not clear how taking farmland out of production for growth and development benefits the community/. Who are you talking about that benefits—the developer community/ the farming community that are developing the land?	Additional growth that may benefit the community may include office and industrial development that provides local job opportunities, retail development that provide local shopping opportunity, or new residential that provides a mix of housing styles, density, and price points and addressed State and local objectives towards providing housing opportunities. No changes are proposed.
71	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-8	Email to City re: PC Workshop #3, October 4 2018	Neighborhoods and Community Character. It should be clarified in the last paragraph of this section that the rural lifestyle is not characterized by "farm-style homes" on 2 acre or greater parcels. Please change to ranch-style homes.	Noted and addressed. See revision 25.
72	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-9	Email to City re: PC Workshop #3, October 4 2018	There seems to be a conflicting message in the Old Town Policy Area with respect to "minimal disruption to the lifestyle of residents and the development of an activity center with regional shopping and entertainments opportunities. Don't appear that these two strategies co-exist. Why this continual focus on Old Town? It also seems the City has poured a lot of \$ into Old Town without much success—why not start fresh in a new area and develop a city core?	The Old Town area is important as the historical center of the community and provides an development type not found elsewhere in the City. Old Town continues to be a priority for the City. The upcoming update to the Old Town Special Planning Area will look at the potential conflicts between the commercial and residential areas. No changes to this language are proposed.
73	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-11	Email to City re: PC Workshop #3, October 4 2018	In the Discussion of SPAs and Community Plan, it states the community is a separately adopted document and not a component of the general Plan. Please clarify what the ramification are for areas i.e. Sheldon/Rural Community in not being a component of the general plan and could community plans be a part of the general plan rather than just a focus on the implementation of general policies. Do community plans carry the same weight and force in the law?	The sentence in question states that Community Plans differ from specific plans in that the former (community plans) are part of the City's General Plan and contain development policies for a defined area, while the latter (specific plans) are separately adopted documents with a focus on the implementation of general plan policies. No changes are proposed.
74	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-12	Email to City re: PC Workshop #3, October 4 2018	Job Creation—the first sentence of this paragraph is a run on sentence. Make a new sentence starting-The City has a lower number of jobs as compared to residents. In the next two sentence change "would" to could. Suggest leaving out the last sentence about more leisure and enjoying nearby amenities and entertainment—that is a supposition.	Staff has reviewed the first sentence in question and no changes are proposed. Regarding the second sentence, additional employment uses would increase the jobs available in the community and contribute to an increase in the jobs/housing ratio. The third sentence has been revised to read "This in turn would reduce commute times for some residents who could choose to work locally." See revision 31.

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75	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-12	Email to City re: PC Workshop #3, October 4 2018	Please clarify what this sentence means to the rural area. "The City desires to foster economic opportunity through carefully planned and coordinated urban and rural development...."land use policies in rural areas can foster agricultural production and agritourism -related. It is important to distinguish between The Rural Area- of ag/res parcels from agricultural and agritourism which relates to the Sacramento County General Plan for retaining agricultural uses within the 100-year floodplain and developing this area as an agritourism area/ wine country/farm stay/farm stands —agritourism may have negative impacts and effect the Rural Area and may require noise and traffic and hours of operation ordinances similar to those adopted by other "wine countries" in the surrounding regions.	Opportunities exist in the Rural Area for agriculture and agritourism. Some existing uses are already in operation. The City is not subject to the Sacramento County General Plan. No changes are proposed.
76	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-12	Email to City re: PC Workshop #3, October 4 2018	Jobs and housing needs— Suggest deleting this discussion on 'adding jobs that match skill set of employees who reside in City and workers will continue to commute to jobs in Elk Grove from other locations throughout the region.' The sentence was discussed at length in the meeting of Planning commission Meeting 9-6 with Darren Dorn [sic] who agreed that assessing the 'skill set' of residents was not realistic and further stated that the Jobs/Housing Balance would not be an overriding principle of the General Plan, but that it would be tracked. There was also concern that training for specific jobs and skill set development for bringing specific jobs to the City was somehow also implied.	While there isn't a specific jobs to housing policy/standard, the City is intending to gather employment dynamics data in order to inform its business attraction efforts. Yes, there are challenges with collecting the information but it is helpful to informing economic development efforts. No changes proposed.
77	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-13	Email to City re: PC Workshop #3, October 4 2018	Preserving agriculture - once again the Rural Area is not Agriculture. Perhaps it is better to say that preserving the Rural Area serves as a reminder of Elk Grove' community roots as a farming community. How is preserving the Rural Area a part of the City's economic development strategy? How does preserving large lots and rural infrastructure balance "new infill development within the existing City limits. Is this infill development with the Rural Area- as that is what it should like. If not in the Rural Area make it clear where this infill development is. Additionally, In addition to supporting resident's desire for a rural lifestyle (which is quiet, peaceful and rather insulated) The City supports related economic activities such as farmers markets, harvest festivals and farm-to-fork dining. Where will that be located? In the Rural Area or in the East Planning/Agricultural Area?	Based upon prior direction agriculture continues to be included in the Rural Area. No changes are proposed.
78	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-22	Email to City re: PC Workshop #3, October 4 2018	Policy LU-3-7. Rural residential uses should be buffered by using distance (open space) and vegetative screening. Community commercial as a "buffer" is not appropriate in the rural area. Low density residential should have a buffer with stated minimum distance requirement from heavy industrial—backyards and large lots are not adequate buffering from commercial . " Should not be located adjacent to Heavy industrial" is not adequate to protect residential uses adjacent to heavy industrial. And where in the City of Planning Areas would that exist these conditions exist?	This policy only applies to the Study Areas. Community Commercial development may include a small retail center, similar to the development in Old Town Sheldon. No changes are proposed.
79	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-23	Email to City re: PC Workshop #3, October 4 2018	Agriculture uses should have required and specific distance (buffers) from all residential uses, including Rural residential uses. Grapes are the main crop adjacent to the East and West Study areas . In addition to dust and noise from farm equipment and workers, and other ag-related activities, including agri-tourism--pesticide use and the potential for drift from the ag site to private residences, commercial sites and schools must be considered, especially due to the prevailing S, SW winds off the Delta . There are many resources on buffers that would provided guidelines for reasonable buffers along the urban/rural edge. "Should" and "should not" are not a policy for buffers from Ag activities and heavy industrial operations. There is recent Law on pesticide use within school zones which should be included and referenced in this Policy Section.	Based upon prior direction agriculture continues to be included in the Rural Area. No changes are proposed.
80	Suzanne Pecci, Resident	General Plan Chapter 4	Email to City re: PC Workshop #3, October 4 2018	Finally, with the mention that buffers maintain physical and economic integrity of ag lands, add a statement that buffers are required to protect and maintain the public health and safety as well as to ensure the public's legal right to reasonable use and enjoyment of their property. Buffers make good neighbors of farmers and urban dwellers. The General Plan needs to address buffers and distances specifically and not leave the decision up to developers or the Planning Dept. at the time of plan submittal. For example, Sacramento County in most cases requires a buffer of 300-500 feet between agriculture and new development with requirements that the developer maintain the buffer. I have forwarded the link to "The Value of Buffer for Pesticide Stewardship and Much More" previously to the Planning Commissioners. Provide more specificity on buffer requirements and add references to State Laws that apply.	Prior Council direction identified a desire for a range of solutions to be available and for the specifics to be determined at the time of application review based upon the context and long-term nature of the area. In some communities agriculture and development occur directly adjacent to each other (see Davis for examples). No changes are proposed.
81	Suzanne Pecci, Resident	General Plan Chapter 4	Email to City re: PC Workshop #3, October 4 2018	Policies: Open space/Conservation District general Components- The first sentence of the intro defines open space and conservation district, as being parks, open spaces , ag-related uses and river, streams and floodplains. The second sentence says that only ag- related uses, public buildings and infrastructure, including parks and open space. Should be located in this district. How do public buildings and public infrastructure fit into this category of conservation and open space?	A variety of public infrastructure could be included in this description, including flood control facilities (e.g., basins, water quality features, pump stations). Public buildings could include facilities that support publically-accessible open space, such as nature areas. No changes are proposed.
82	Suzanne Pecci, Resident	General Plan Chapter 4, page 4-24	Email to City re: PC Workshop #3, October 4 2018	Policy LU-3-9 Please discuss (and is it in the glossary of terms) "Islanding of higher-density uses" in the 100- and 200 year floodplains as a policy to get around the City policy of not building in the floodplain, unless approved by Council. I don't remember this as being a term used in any discussion of the floodplain in City workshops. What are FEMA ramifications of slanting?	"Islanding" refers to the creation of an island of land surrounded by potential flood waters. Policy LU-3-9 and policies under Goal ER-2 limit development within the 100-year and 200-year floodplains. The proposed policies are consistent with State and Federal guidance. No changes are proposed.
83	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-29	Email to City re: PC Workshop #3, October 4 2018	East Study Area Development Pattern. Please explain the arrows perpendicular to the lines from the "nodes." Shouldn't the green area be called Agriculture/open space/conservation District? South Study Policy Area pg 4-31. Shouldn't there be some discussion of the casino being across the street and the large "node" in this policy area reflective of the influence the casino will have on the type of activity district ? This area is mainly housing, very little open space and there doesn't appear to have a proportional area in the activity district to meet the jobs housing balance and very few public services. Will all these residents be traveling on local roadways to get to the services they need to access, is it covered mobility sections?	The arrows refer to major street facilities to be developed in the area. The green area refers to the Open Space/Conservation District discussed in LU-3-9 and LU-3-10. The proposed Wilton Rancheria project is not located in this Study Area. Residential uses were selected for the majority of this area for compatibility with surrounding development to the north and the distance from the regional employment cater in the Southeast Policy Area. No changes are proposed.

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84	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-34	Email to City re: PC Workshop #3, October 4 2018	Policy West Study Area Development. Same comments—very little open space, lots of density and a small activity district along a main thoroughfare and small job opportunity area. Will these residents also be traveling to get to the services they need? Same as above.	Specific open space is included in the figure, particularly in areas encumbered by the Shed C corridor. Additional parks, open space, and similar features are included in the Residential Neighborhood District as listed in Table 4-4. Employment opportunities are provided along the Bruceville corridor and in the adjoining South Study Area, as well as the adjoining Southeast Policy Area. See Figure 3-2 for a composite map. No changes are proposed.
85	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-34	Email to City re: PC Workshop #3, October 4 2018	Policy LU 3-17 Provide a figure that shows this policy- "Area of Concern-" relative to SOIs Policy LU-3-18 what are the Sections of CKH which speak to these master tax sharing and fair share housing needs of the region? I am interested in reading more.	As described, the Area of Concern would be any areas in Figure 3-4 that are not either (1) inside the City Limits or (2) inside the approved Sphere of Influence for the City, but are (3) inside the General Plan Planning Area. For more information of Areas of Concern, see Sacramento LAFCo Policies, Chapter V (Specific Standards by Type of Action), part H (Sphere of Influence Plans), subpart 3. Various sections of Cortese-Know-Hertzberg (CKH) address tax sharing agreements, including but not limited to Section 56375.3(B)(8), as well as Revenue and Taxation Code Section 99.
86	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-35	Email to City re: PC Workshop #3, October 4 2018	Policy LU 3-19 In what ways will the City promote SOI expansion of other agencies and independent districts with LAFCo? What agencies and independent and special districts will the City work with LAFCo to promote ? What LAFCo policy does this promotion fall under?	An example would include the SOI and service boundary for Sacramento Area Sewer District and the Sacramento Regional County Sanitation District. These and other agencies may require expansion of their SOIs and service territories as City annexations occur in order to ensure effective public services. See Sacramento LAFCo for more detail regarding their policies.
87	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-35	Email to City re: PC Workshop #3, October 4 2018	Policy LU-3-21: Please clarify what this policy means —It sounds like it means accept annexation proposal at the time of application without reviewing and assuring all conditions of the annexation have been met—clarify application and with whom is it filed with the City or LAFCo and what is the significance of a "contiguous development pattern "relative to this policy?? Identify legal reference.	Annexation applications by private parties are filed with the City first so that master planning and pre-zoning may occur. The City makes application for annexation to LAFCo. "Accepting" an application means to receive it for processing. This policy means that the City will only accept applications for annexation when the project area is (1) already within the City's SOI and (2) the area is adjoining to the existing City limits. This is consistent with LAFCo policies and law prohibiting island annexations and promoting orderly development. No changes are proposed.
88	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-35	Email to City re: PC Workshop #3, October 4 2018	Policy LU-3-22. Identify the section (s) of CA law and regulation that this references.	No specific State or Federal law is referenced in the policy. However, CEQA requires the mitigation of potentially significant impacts to biological resources. By having this policy the City is intending to develop a mitigation program that addresses these potential impacts in a more holistic way. No changes are proposed.
89	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-35	Email to City re: PC Workshop #3, October 4 2018	Pg 4-36 Annexation Criteria and Submittal Requirements-- Include a policy or criteria that requires identification of a water supply in compliance with the Sustainable Groundwater Management Act SGMA that addresses the sustainable yield of the Basin.	Noted and addressed. See revision 48.
90	Suzanne Pecci, Resident	General Plan Chapter 4, Page 4-40	Email to City re: PC Workshop #3, October 4 2018	Policy LU-4-1 prioritization of pedestrian and bike access was not decided to be a priority in the Rural Area as determined by the Mobility Workshop.	Noted. Proposed policies regarding the Rural Area address this. No changes proposed.

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91	Kathrin and Paul Krieg, Residents	General Plan Chapter 4 General Plan Chapter 2 General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	<p>We are surprised at how many events we can hear at our house taking place at the Sheldon Inn. The noise level affects us to the point of having to close our windows at night to be able to sleep. Therefore we wonder how an event center fits into the rural area/rural lifestyle as stated in your general plan.</p> <p>For example, your general plan declares:</p> <ul style="list-style-type: none"> • Chapter 4, page 5, paragraph 3 "...protecting our farming heritage and rural life style" is one of the city's goals. • Chapter 4-13 states "In addition to supporting residents' desire for a rural life style..." • GOAL LU-7: AN ESTABLISHED, PROTECTED, AND SUPPORTED RURAL AREA A defining feature of the Rural Area is the community's dedication to preserving the agricultural and rural lifestyle of the area as an important part of Elk Grove's heritage. Small farms and the keeping of livestock are allowed throughout the Rural Area. Residents of this area have generally indicated that they value preserving the rural feel of their community, as well as the existing type and character of infrastructure. The community recognizes that retaining its farming heritage is an important economic strategy. In addition to attracting residents who desire this lifestyle, certain economic activities are encouraged in the Rural Area, including farmers markets, harvest events, and farm-to-fork dining. • Policy SRA-1-4: Identify improvements and service needs in the Sheldon/Rural Area that support and enhance the rural lifestyle. • Guiding Principles: The Sheldon/Rural Area represents Elk Grove's proud heritage and agricultural roots. It is the primary agricultural area in the city with rural residential, agricultural, open space, and supporting commercial uses. As new development occurs, preserving and enhancing this rural lifestyle and heritage is a priority for the community. <p>In closing, we do not understand how an event center which has strobe lights, disco balls, and amplified music can even be considered to be located in a rural community such as Sheldon.</p>	This comment references a pending project. The General Plan identifies various policies relative to noise. There are no major changes to the noise policies from the existing General Plan. No changes are proposed.
92	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 4, Pages 4-11 and 4-27	Email to City re: PC Workshop #3, October 4 2018	<p>The following information reflects a consensus of the residents of GSREHA.</p> <p>NAMING THE RURAL AREA: Elk Grove Rural Community. The Draft General Plan refers to the rural area in Elk Grove as the "Sheldon/Rural Area Community". Since all our entry road signs say "Elk Grove Rural Community", GSREHA residents suggest that this is the better descriptive identity that should be used as it is already in use and in place.</p>	Noted and addressed. See revision 40.
93	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 4, Page 4-11	Email to City re: PC Workshop #3, October 4 2018	<p>Specific Plans, Special Planning Areas, and Community Plans. Paragraph 3. Community Plans are defined as: "Community plans differ from specific plans in that the former are part of a city's general plan and contain development policies for a defined area, while the latter (i.e., The Rural Community Plan) are separately adopted documents (not a component of the general plan) with a focus on the implementation of general plan policies." The rural GSREHA residents, having been involved since before Elk Grove became a city, in retaining and protecting the rural integrity and lifestyle. They, therefore, propose that the rural community plan be designated as a component of the general plan.</p>	The Rural Area Community Plan is part of the General Plan. See Chapter 9.
94	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 4, Page 4-22	Email to City re: PC Workshop #3, October 4 2018	<p>Policies: Residential Neighborhood District General Components. Policy LU-3-7. Rural Residential uses should be buffered from higher-intensity uses with Open Space, Community Commercial or Residential Estate (include only ER-1) uses. Delete: ER-2, ER-4 and Low-Density Residential Uses.</p>	This policy only applies in the Study Areas and does not apply to the Sheldon Rural Area. No changes are proposed.
95	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 4, Page 4-24	Email to City re: PC Workshop #3, October 4 2018	<p>Policy LU-3-10. Provide a buffer between residential, commercial and industrial uses. Include: Provide buffers on AR developments.</p>	This policy only applies in the Study Areas and does not apply to the Sheldon Rural Area. No changes are proposed.
CHAPTER 5: ECONOMY AND THE REGION					
96	Lynn Wheat, Resident	General Plan Chapter 5	Letter to City (No Date)	<p>This chapter needs to offer commitment to future redevelopment legislation such as AB 3037 that would help promote economic development in target areas.</p>	The City may pursue a redevelopment program if the approach is correct for the City. AB 3037 was not approved by the Legislature. It is too early to speculate on what such a program may look like. No changes are proposed.
97	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-3	Letter to City (No Date)	<p>Significant and Growing Business; employs mix of residents and imported daily workers; Bay area moving in.</p>	Comment noted.
98	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-4	Letter to City (No Date)	<p>Market driven incentives! The pictures in this chapter show all retail businesses. Where is the commerce/manufacturing/high paying jobs?</p>	Comment noted. Staff has added additional photos of office and industrial development in the City. See revision 53.
99	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-4	Letter to City (No Date)	<p>Goal RC-2 Strong interagency coordination; too broad a statement. How were the other agencies engaged in developing this general plan update?</p>	The City regularly coordinates with other agencies and organizations, including SACOG and Greater Sacramento Economic Council (GSEC).
100	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-5	Letter to City (No Date)	<p>Overriding considerations on Traffic</p>	Comment noted.
101	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-6	Letter to City (No Date)	<p>Targeted businesses; Need the land use designations and ability to wait on the market and not respond to "current" demand.</p>	Comment noted.
102	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-7	Letter to City (No Date)	<p>SACOG include the specific jobs/housing ratio. 2003 General plan; Boost economic development and local employment; more residential happened. Jobs defined; more retail. Increase foreclosures; highest in region.</p>	Historic jobs/housing ratio for the City is shown in Figure 5-1. Comment noted.
103	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-8	Letter to City (No Date)	<p>Type of jobs? Multigenerational households; what role does this play in the housing/jobs imbalance?</p>	Comment noted. This is one of the reasons the jobs/housing ratio is an ineffective measure of jobs conditions at the local level as it does not consider household sizes.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
104	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-11	Letter to City (No Date)	Market trends over time, what role does this play?	It is unclear which policy this comment is in reference to. No changes proposed.
105	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-12	Letter to City (No Date)	Elk Grove Major employment centers; is this going to include the retail and restaurant sectors?	No, major employment centers follow the SACOG definition as described in the last paragraph on the page. No changes proposed.
106	Lynn Wheat, Resident	General Plan Chapter 5, Page 5-14	Oral comment, Planning Commission Workshop #1, September 6 2018	Picture on pg. 5-14 should be updated – shouldn't be a pit.	The existing photo ties in with Policy RC-1-3. No changes are proposed. Staff has added additional photos of office and industrial development in the City. See revision 53.
107	George Murphey, Planning Commissioner	General Plan Chapter 5, Page 5-15	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy RC-2-1, coordination with regional planning agencies on land use and environmental issues: How will this work? Concerned that Elk Grove will get bogged down.	This type of coordination is already occurring on a regular basis. No changes are proposed.
108	George Murphey, Planning Commissioner	General Plan Chapter 5, Page 5-15	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy RC-2-4: Supports streamlining of process.	Comment noted. Staff has made an adjustment to the language as discussed at the workshop. See revision 58.
109	Frank Maita, Planning Commissioner	General Plan Chapter 5, Page 5-3	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Should we use the term "bedroom community"? Is it a bad thing?	Comment noted. Staff has revised the sentence to read "it is currently a bedroom community". See revision 52.
110	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 5, Page 5-3	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Concurs with and reiterates recognition that we are a bedroom community but also do need some economic growth.	Comment noted. No changes proposed.
111	Kevin Spease, Planning Commissioner	General Plan Chapter 5, Page 5-11	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy ED-3-2: Doesn't want to limit growth to apply to larger businesses or those with more employees.	Comment noted. See revision 55.
112	Kevin Spease, Planning Commissioner	General Plan Chapter 5, Page 5-15	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy RC-2-4 Questions emphasis on "large" businesses again; consider rewording.	Comment noted. Staff has made an adjustment to the language as discussed at the workshop. See revision 58.
113	Kevin Spease, Planning Commissioner	General Plan Chapter 5, Page 5-11	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Want to emphasize focus on local businesses and expansion.	Local business and expansion is described in Goal ED-3. See changes to Policy ED-3-2 (revision 55).
114	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 5, Page 5-11	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy ED-2-3: Cautions against the use of "support".	Support in this context may include, but is not limited to, providing space for events, helping market activities such as job fairs and training programs, as well as potential financial support. The policy is not specific and leaves options open and available. No changes proposed.
CHAPTER 6: MOBILITY					
115	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-8	Letter to City (No Date)	Policy MOB-1-1, The General Plan needs to acknowledge that the approval of overriding considerations may have a cumulative impact on the city's infrastructure, despite the findings. The General Plan needs to summarize the previously approved overriding considerations, acknowledge the probably use of findings in the future, and develop a policy: The future use of findings of consideration shall require a cumulative analysis of past approvals, their assumptions and basis for approval, and the effective performance/results of those approvals.	The General Plan provides the policies of the City. Consideration of overriding considerations is documented in the accompanying CEQA document (the General Plan EIR). That EIR has been prepared consistent with State law and the State CEQA guidelines. No changes are proposed.
116	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-9	Letter to City (No Date)	Parks and Open Space: Consider People traveling to these areas. Many cars park at the soccer field parks, park near the creeks for walks.	Commented noted. The City is preparing for an update to the Bike, Pedestrian, and Trails Master Plan, which can look at site-specific considerations and opportunities for extension of pedestrian and trail opportunities to better connect parks with neighborhoods. That said, some park activities, such as soccer and baseball leagues, pull participants from across the City and driving is the only feasible opportunity. No changes proposed.
117	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-10	Letter to City (No Date)	Reference Transportation Impact Assessment Guidelines, Elk Grove Development Service Department.	The grey box in the margin has been updated to provide the correct reference to the Transportation Analysis Guidelines. See revision 62.
118	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-11	Letter to City (No Date)	MOB-1-3 Second paragraph, how is it determined which project will go to the Zoning Administrator, Planning Commission or City Council?	Project approvals are provided in Title 23 of the Municipal Code (the Zoning Code) based upon the type of permit or project approvals being applied for. No changes proposed.
119	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-12	Letter to City (No Date)	Table 6-3. The table shows the target intersection performance targets. Another table needs to be added which shows the existing peak performance delays at some of the major intersections in the city.	This data is available in the EIR based upon existing conditions. This data is updated as needed for traffic study purposes and would be dated quickly. Staff recommends against including it in the General Plan. No changes proposed.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
120	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-14	Letter to City (No Date)	Goal MOB-2. The General Plan needs to identify who has jurisdictional control of the Franklin Field airport, and summarize any key points of the airport master plan if one exists. Provide a map showing the location and any areas of future expansion if applicable.	Franklin Field is owned and operated by Sacramento County as part of their system of general aviation facilities. The current Comprehensive Land Use Plan was prepared in 1992 and is available at https://www.sacog.org/comprehensive-land-use-planning-maps . The overflight zone does not overlap with the General Plan Planning Area. A map showing the location of area aviation facilities, including Franklin Field and Sacramento Executive has been added to the chapter. See revision 63.
121	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-15	Letter to City (No Date)	Goal MOB-3, make distinction between public and private streets and discuss whether all of the policies are applicable to both type streets.	Consistent with Policy MOB-7-7, private roadways shall be constructed to public roadway standards. This means that complete street policies would be applicable to private streets. Additional language has been added to clarify this. See revision 64.
122	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-15	Letter to City (No Date)	Standard MOB-3-2a, include office, industrial, and multi-family projects to provide an electric vehicle charging station. Add a standard of how many stations required as a ratio based on the number of required parking spaces. For example, 1 charging station required per each 10 vehicle space required for the project.	Revisions to this standard are being considered as part of the Climate Action Plan. See revision 65.
123	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-16	Letter to City (No Date)	Goal MOB-3-9. Expand policy to discuss types of funds, such as development impact fees that are available. The statement "As funds become available" lacks commitment and priority to secure funding.	Funding opportunities may change over time and any list would be incomplete and possibly inconsistent in the future. Staff recommends not including a list. No changes proposed.
124	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-17	Letter to City (No Date)	Policy MOB-3-12. Reference a goal of providing pedestrian activated crossing lights at all mid-block trail/bike path crossings.	This is an improvement standards issue that is currently being looked at. Staff recommends against this level of detail in the General Plan. No changes proposed.
125	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-17	Letter to City (No Date)	Policy MOB 3-13, add discussion of ensuring deceleration lanes are added along arterials for safe entry and slower speeds entering large projects that will cross bike paths and walkways.	This is an improvement standards issue and is informed by the level of development as specific properties. Staff recommends against this level of detail in the General Plan. No changes proposed.
126	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-20	Letter to City (No Date)	"Advance the most feasible regional transit services and infrastructure". Feasible is Funding; Discuss or mention funding.	Funding issues are mentioned in the preceding sentence. No changes are proposed.
127	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-20	Letter to City (No Date)	Amtrak commuter rail- to Bakersfield? Is this the introduction of this plan to Elk Grove Residents? Policy should include priority. What is the top priority for residents of Elk Grove and Region? Funding?	No, this is not the first mention of this. A feasibility study of potential station locations was prepared in 2017/2018 and included extensive outreach with surrounding neighborhoods. No final site or sites were selected. No changes are proposed.
128	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-21	Letter to City (No Date)	Policy MOB-5-7, expand policy to commit to provide shelters for all transit stops in the city.	Shelters are provided at transit stops where physically feasible and in alignment with passenger boarding figures. Investment in shelters may not be financially beneficial where no or limited ridership occurs. No changes are proposed.
129	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-21	Letter to City (No Date)	Goal MOB-5-9, in addition to requiring a dedication of right-of-way for rapid bus and/or light rail, state that right-of-way dedication and construction of sheltered bus stops will be required as part of any development project to be located along an identified bus stop location.	New bus stops constructed as part of new development typically include shelters. This is identified in the City's improvement standards. No changes are proposed.
130	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-24	Letter to City (No Date)	Policy MOB-7-4, describe the current development impact fee structure and what the current transportation fee component is, and when was the last time the fee was adjusted. Commit to ensuring the fee remains adequate to reflect the rising cost of materials and construction.	The policy notes the existing fee programs in place. These fees are updated approximately every five years consistent with State law. The Roadway Fee was last updated in 2014 and will be updated again in 2019 (update has commenced). The I-5 Sub-regional Fee was adopted in 2017 and would be updated as appropriate by the regional partners. No changes proposed.
131	George Murphey, Planning Commissioner	General Plan Chapter 6, Page 6-2	Email to City, October 15 2018	Land Use Distribution, 1st sentence, suggest change to "ease of use" rather than "ease."	Comment noted and change made. See revision 60.
132	George Murphey, Planning Commissioner	General Plan Chapter 6, Page 6-10	Email to City, October 15 2018	Table 6-2 - are VMT limits yearly mileages? Identify to clarify for reader.	VMT limits are daily numbers. A clarification has been added to page 6-7. See revision 61.
133	George Murphey, Planning Commissioner	General Plan Chapter 6, Page 6-16	Email to City, October 15 2018	Goal MOB-4-1 - Suggest inserting "promote 'context sensitive' pedestrian...."	Comment noted and change made. See revision 66.
134	George Murphey, Planning Commissioner	General Plan Chapter 6, Page 6-25	Email to City, October 15 2018	What is "road/parking pricing"? Clarify.	Road pricing refers to road user charges, such as road tolls, distance or time based fees, congestion charges, and other charges to discourage use of certain travel modes. Parking pricing refers to charging a user fee for parking. These types of programs have been shown in other regions to help in increasing vehicle share/occupancy load for commutes or otherwise reducing driving. The policy lists a range of strategies that may be considered and is not specifically identifying any for implementation. A grey box defining the concepts has been added to the margin. See revision 73. No changes to the policy are proposed.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
135	Oscar Balaguer, 350 Sacramento	General Plan Chapter 6	Email to City re: Planning Commission Workshop #4, October 18 2018	Since last month's workshop there's been grim climate news from the UN. Extreme weather and other effects have begun; we're not reaching greenhouse gas goals; and time's running out. It will require "rapid and far-reaching" transitions to hold the heat increase to a manageable 1.5 degrees centigrade. Letting it reach two degrees means major, maybe irreversible, harm to natural and human systems; and we're halfway there. The conundrum is that <i>each</i> jurisdiction wants to escape inconvenience; and <i>any</i> jurisdiction's efforts are barely significant; but absent <i>every</i> jurisdiction's robust efforts, we and our children will surely have a bleak future. So it's both a practical and a moral challenge. 350 urges you to face this challenge. Doing so will also bring benefits in local jobs, health, money savings, and quality of life.	Comment noted.
136	Oscar Balaguer, 350 Sacramento	General Plan Chapter 6, Page 6-7.	Email to City re: Planning Commission Workshop #4, October 18 2018	Policy MOB 1-1 states a minimal intention re: VMT reduction. SB 743 allows you aggressive VMT goals, and we urge a strong policy statement. Given the threat, we propose no net increase in emissions as the only adequate goal. We're also concerned with the kick-out that lets the City exempt favored projects from VMT requirements Flexibility is good, but this is not the place for it.	VMT, as a metric, is currently structured by the State as a CEQA threshold. As with anything in CEQA significant and unavoidable impacts may be overridden, provided it is consistent with other goals/objectives of the City. The specific VMT reduction identified in the General Plan is consistent with guidance from the State. No revisions are proposed.
137	Oscar Balaguer, 350 Sacramento	General Plan Chapter 6	Email to City re: Planning Commission Workshop #4, October 18 2018	Policies MOB 5-1 through 5-9 are good but there's no mention of implementation in the CAP or in the "Implementation Strategy." Transit involves big investments; but every journey begins with a single step. Please show how the City plans to move toward its transit aspirations.	The General Plan identifies City goals and policies. Implementing actions are covered in various master plans. The City is initiating a project later this fiscal year for a plan to implement Bus Rapid Transit services in the City. No changes are proposed.
138	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-9	Oral comment, Planning Commission Workshop #4, October 18 2018	Parks and open space. Consider people traveling to parks and open space.	VMT impacts relative to these uses are provided in the other land uses categories, including the residential listings. The Park Design Principles speak to siting requirements for new park facilities and how they are integrated into neighborhoods and connected with trails and other non-vehicular modes. No changes are proposed.
139	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-14	Oral comment, Planning Commission Workshop #4, October 18 2018	Identify who has control of Franklin Airport.	Franklin Field is owned and operated by Sacramento County as part of their system of general aviation facilities. No changes are proposed. See comment 107.
140	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-16	Oral comment, Planning Commission Workshop #4, October 18 2018	Expand policy to discuss fund types – currently lacks specificity.	See comment 123
141	Lynn Wheat, Resident	General Plan Chapter 6, Page 6-16	Oral comment, Planning Commission Workshop #4, October 18 2018	Made two comments on Overriding Considerations. With these – things won't get better.	CEQA is a disclosure requirement and does not, in and of itself, limit the City's ability to undertake a project. Potentially significant impacts must be mitigated to the extent feasible and the project must be consistent with the General Plan. If an impact cannot be mitigated to less than significant levels a Statement of Overriding Considerations may be prepared. That Statement must be consistent with the General Plan.
142	Oscar Balaguer, 350 Sacramento	General Plan Chapter 6	Oral comment, Planning Commission Workshop #4, October 18 2018	Underscored the need for each community to address issues of greenhouse gas (GHG)/climate change.	Comment noted.
143	Oscar Balaguer, 350 Sacramento	General Plan Chapter 6	Oral comment, Planning Commission Workshop #4, October 18 2018	MOB-1-1 Minimal intention for GHG reduction. Urges a stronger statement. Urges no net increase. Concerned with ability to exempt certain projects. Flexibility is good but not for vehicle miles traveled (VMT).	See comment 136
144	Oscar Balaguer, 350 Sacramento	General Plan Chapter 6	Oral comment, Planning Commission Workshop #4, October 18 2018	MOB-5-1 through MOB-5-9: Good policies but no related implementation (in Climate Action Plan or Chapter 10).	See comment 137
145	Sharon Lynes, Resident	General Plan Chapter 6, page 6-7	Oral comment, Planning Commission Workshop #4, October 18 2018	Policy MOB-1-1: "project subject to all feasible mitigation measures"; "City may consider approval subject to Statement of Overriding Considerations". Then why have these standards at all?	CEQA is a disclosure requirement and does not, in and of itself, limit the City's ability to undertake a project. Potentially significant impacts must be mitigated to the extent feasible and the project must be consistent with the General Plan. If an impact cannot be mitigated to less than significant levels a Statement of Overriding Considerations may be prepared. That Statement must be consistent with the General Plan.
146	Randy Bekker, Resident	General Plan Chapter 6	Oral comment, Planning Commission Workshop #4, October 18 2018	Interesting how we can continue to throw away our future. Bottlenecks are happening through Old Town, 95462 zip code. Concerned with east-west traffic on Laguna. Traffic through Sheldon should have been diverted.	The General Plan identifies a range of roadway improvement that are necessary as development occurs. The timing of those improvements is determined through engineering studies. A number of transportation improvement projects need to be completed as broadly identified in Figures 3-6 and 3-7. No changes are proposed.
147	Randy Bekker, Resident	General Plan Chapter 6	Oral comment, Planning Commission Workshop #4, October 18 2018	Get right-of-way when you can and think beyond 20-30 years. Roadways moving to Kammerer need to have right-of-way set aside now.	Comment noted. The City requires dedication of ultimate right-of-way as part of new development, even of roadway improvements are phased. No changes are proposed.
148	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 6	Commissioner Comments, Planning Commission Workshop #4, October 18 2018	How we plan now will set the tone for how we grow. Need to consider impacts on air quality/GHG and decide the approach now. Look at pre-screened areas and hold to it (e.g., no general plan amendments). Need to stop putting "outs" into our plans (e.g., Statement of Overriding Considerations).	Comment noted.
149	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 6	Commissioner Comments, Planning Commission Workshop #4, October 18 2018	More lanes do not reduce congestion.	Comment noted. The General Plan considers reduced lane improvements on select segments where it makes sense and in alignment with area character considerations. No changes proposed.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
150	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 6	Commissioner Comments, Planning Commission Workshop #4, October 18 2018	Adding bike/ped lanes as "mitigation" to add more vehicle lanes is not mitigation.	Comment noted.
151	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 6	Commissioner Comments, Planning Commission Workshop #4, October 18 2018	Need to build bike/ped in order for people to start to bike/walk.	Comment noted.
152	George Murphey, Planning Commissioner	General Plan Chapter 6	Commissioner Comments, Planning Commission Workshop #4, October 18 2018	Doesn't think people will start riding bikes.	Comment noted.
153	George Murphey, Planning Commissioner	General Plan Chapter 6	Commissioner Comments, Planning Commission Workshop #4, October 18 2018	Mitigations are a bit pie in the sky.	Comment noted.
154	George Murphey, Planning Commissioner	General Plan Chapter 6	Commissioner Comments, Planning Commission Workshop #4, October 18 2018	Connector through Sheldon is going to be a nightmare. But the decision has been made.	Comment noted.
155	Frank Maita, Planning Commissioner	General Plan Chapter 6	Commissioner Comments, Planning Commission Workshop #4, October 18 2018	Would like bike lanes to be separated – cater to the casual biker.	Comment noted. Where possible staff will look at Class 1 and Class 4 trail facilities along major roadways.
156	Frank Maita, Planning Commissioner	General Plan Chapter 6	Commissioner Comments, Planning Commission Workshop #4, October 18 2018	Need to consider the human wants rather than just a focus on meeting technical standards.	Comment noted. The General Plan considers reduced lane improvements on select segments where it makes sense and in alignment with area character considerations. No changes proposed.
CHAPTER 7: COMMUNITY AND RESOURCE PROTECTION					
157	Hollis Erb, Resident	General Plan Chapter 7, Page 7-29	Letter to City (No Date)	<p>Policy NR-1-6: Encourage the retention of natural stream corridors, and the creation of natural stream channels where improvements to drainage capacity are required.</p> <ul style="list-style-type: none"> Suggested wording change for NR-1-6 <p>"Encourage the retention of natural stream corridors; man-made stream channels be designed and maintained such that they quickly attain most of the appearance and function of natural stream corridors."</p>	Staff recommends leaving the policy as currently drafted but adding additional language to Standard NR-1-6d to address the comment. See revision 89.
158	Hollis Erb, Resident	General Plan Chapter 7, Page 7-35	Letter to City (No Date)	<p>"Policy NR-4-9: Prohibit the future siting of sensitive land uses, such as hospitals, schools, day care facilities, elderly housing, convalescent facilities, and all residential facilities within the distances recommended by the California Air Resources Board for air pollutant emission sources, unless adequate mitigation measures are adopted and implemented."</p> <p>I do not understand this paragraph. Perhaps the word "for" was meant to be "from." (line 3)</p>	The policy as written is correct. It prohibits the list of sensitive land uses from being placed within the distances recommended by Cal ARB for air pollutant emission sources. No changes recommended.
159	Gregory Jones, Resident	General Plan Chapter 7, Page 7-30	Email to City re: PC Workshop #2, September 20 2018	The Sheldon Rural area should have **NO** exemptions to allow clustering. "Clustering" has no place in a rural area, period.	The clustering provision relative to the Rural Area is being removed (i.e., clustering will be prohibited in the Rural Area). See revision 90.
160	Eileen Conwell & Frank Roubos, Residents	General Plan Chapter 7, Page 7-30	Email to City re: PC Workshop #2, September 20 2018	<p>Regarding language in Chapter 7 of the proposed General Plan update addressing "clustering", please delete the following statement:</p> <p>"If clustering is allowed in the rural area, those properties shall be exempt from providing urban water and sewer connections in accordance with the policies of the Sheldon/Rural Area Community Plan".</p> <p>The term "clustering" is and always will be a dirty word in the rural area. The definition of rural is a two acre minimum lot per household, which provides ample space between lots to safely accommodate independent water wells and septic systems. Introducing the idea of clustering into the rural area defeats the purpose and potentially jeopardizes the rural landscape.</p> <p>Elk Grove is unique in providing a rural option for home buyers to choose from. Please protect this gem! Please remove any mention of clustering pertaining to the rural area from the proposed new General Plan.</p>	The clustering provision relative to the Rural Area is being removed (i.e., clustering will be prohibited in the Rural Area). See revision 90.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
161	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 7, Page 7-30	Email to City re: PC Workshop #2, September 20 2018	Please make the following amendments to the language of the Draft EG General Plan Policy NR-1-9: Encourage development clustering where it would facilitate on-site protection of woodlands, grasslands, wetlands, stream corridors, scenic areas, or other appropriate features such as active agricultural uses and historic or cultural resources under the following conditions and requirements. • Clustering shall not be allowed in the Sheldon Rural Area. • Urban infrastructure capacity is available for urban use. • On-site resource protection is appropriate and consistent with other General Plan policies. • The architecture and scale of development are appropriate for and consistent with the intended character of the area. • Development rights for the open space area are permanently dedicated and appropriate long-term management, with funding in perpetuity, is provided for by a public agency or another appropriate entity	The clustering provision relative to the Rural Area is being removed (i.e., clustering will be prohibited in the Rural Area). See revision 90.
162	Lynn Wheat, Resident	General Plan Chapter 7, Pages 7-7 and 7-38	Oral comment, Planning Commission Workshop #2, September 20 2018	Sustainability definition: environment, community, and economy. Need to add in community.	Community is included in the list in Policy GOV-1-5. No changes proposed.
163	Lynn Wheat, Resident	General Plan Chapter 7, Page 21	Oral comment, Planning Commission Workshop #2, September 20 2018	GHG emissions inventory – 2013. Need to commit to date to update the inventory and put in the policy document.	Chapter 5 of the CAP includes Implementation Measure 4 (page 5-9 of the CAP) that calls for review and update of the emissions inventory every three years. No changes to the General Plan are proposed.
164	Lynn Wheat, Resident	General Plan Chapter 7, Page 21	Oral comment, Planning Commission Workshop #2, September 20 2018	City won't remove Styrofoam, City isn't leading by example	Comment noted.
165	Lynn Wheat, Resident	General Plan Chapter 7, Page 21	Oral comment, Planning Commission Workshop #2, September 20 2018	Problem of placement of parks at edges of neighborhoods, not within centers of areas. Favors developers too much.	Comment noted. The CCSD/City Parks Design Principles identifies placement of park facilities. Local and Neighborhood parks are integrated within neighborhoods. Community Parks, because of the types of facilities they provide, are located along more major roadway facilities.
166	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 7, Page 7-30	Oral comment, Planning Commission Workshop #2, September 20 2018	Clustering does not belong in rural area, should be limited to urban centers.	The clustering provision relative to the Rural Area is being removed (i.e., clustering will be prohibited in the Rural Area). See revision 90.
167	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 7	Commissioner Comments, Planning Commission Workshop #2, September 20 2018	More emphasis on livability, preservation.	Comment noted. See revision 74.
168	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 7, Pages 7-30 and 7-31	Commissioner Comments, Planning Commission Workshop #2, September 20 2018	Need to expand on the number of trees. Language about trees is weak.	While other policies in the General Plan address trees (see LU-5-8, MOB-4-5, ER-6-4, Action 12.1), staff recommends modifications to the policies in NR-2. See revision 91.
169	William Myers, Sheldon Community Association	General Plan Chapter 7, Page 7-18	Email to City re: PC Workshop #3, October 4 2018	Open Space and Habitat Conservation: The paragraph on clustered development should include the notation that it is prohibited in the rural area.	The clustering provision relative to the Rural Area is being removed (i.e., clustering will be prohibited in the Rural Area). See revision 90.
170	William Myers, Sheldon Community Association	General Plan Chapter 7, Page 7-18	Email to City re: PC Workshop #3, October 4 2018	Trees and Urban Forestry - Please include a sentence to the effect that the City of Elk Grove will encourage the expansion of arborization through community efforts. The two rural community associations, GSREHA and SCA, have a long history of a joint annual campaign to increase native oak arborization in the rural area, which has been honored with a prize from the Sacramento Tree Foundation. We would like that citizen effort, and others like it, to be encouraged by the City as a matter of policy.	A policy about supporting regional and community arborization programs has been added. See revision 93.
171	William Myers, Sheldon Community Association	General Plan Chapter 7, Page 7-30	Email to City re: PC Workshop #3, October 4 2018	Request and support deletion of references to application of Cluster Development policy in the Sheldon Rural Area.	The clustering provision relative to the Rural Area is being removed (i.e., clustering will be prohibited in the Rural Area). See revision 90.
172	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-7	Letter to City (No Date)	It should read: community, environment, and economy as without a strong community the environment will not sustain nor the economy prosper.	Community is listed, along with economy and environment. Under the concept of sustainability all three components have equal weight.
173	Lynn Wheat, Resident	General Plan Chapter 7, page 7-9	Letter to City (No Date)	Cultural destination in the region. Focus should emphasis providing cultural amenities for existing and future residents of Elk Grove	Comment noted. See revision 77.
174	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-9	Letter to City (No Date)	Art 1-1 How about including something like: promoting arts in community affords residents opportunities for experiences within our own City?	This is more of a supporting statement, rather than a policy. Language similar to this exists in the introduction to the section. No changes are proposed.
175	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-10	Letter to City (No Date)	Pictures: How about a local art sculpture? Painting? The variety of local art? Music?	Staff will look at adding additional photos of arts and cultural events in the City within the available page space. See revision 78.
176	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-12	Letter to City (No Date)	Open space near Elk Grove: how about a picture of "open space within Elk Grove"	Staff will look at adding additional photos within the available page space.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
177	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-14	Letter to City (No Date)	3rd paragraph: bike trails to Stone Lakes and the Cosumnes River. Is this on a map? Where else is this described in the General Plan? Included in EIR? It is stated this is outside the Planning Area does this suggest the Planning Area could be extended?	See Figure 3-6, which shows a future Class I trail along Kammerer Road to I-5, which would provide a connection to the Stone Lakes preserve. Connection to the Cosumnes River Preserve (south of the City on Franklin Boulevard) is not shown as it is outside the Planning Area. The Planning Area has not been expanded.
178	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-14	Letter to City (No Date)	Policy PT-1-3 Parks, 5 acres per 1,000 residents. When clustering occurs within a residential area than more than 5 acres per 1,000 acres should be the policy.	Park land requirements are based upon population and do not directly relate to the clustering policy. No changes proposed.
179	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-17	Letter to City (No Date)	Policy PT-2-6 As traffic congestion is an expectation bike trails and pedestrian walkways need to be protected lanes and multiuse trails.	Noted. This policy addresses trails along riparian corridors and wetlands. No changes to this policy are proposed.
180	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-21	Letter to City (No Date)	Inventory completed in 2013. Do it now or commit to a date when it will be updated.	The CAP will be updated on a regular basis. See CAP Implementation Measure 4 (page 5-9 of the CAP). No changes to the General Plan are proposed.
181	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-22 through 7-25	Letter to City (No Date)	Discussed Elk Grove Water Service and others. Does not discuss SGMA.	The correct title is Elk Grove Water District. Staff will review the document and confirm all titles are correct. Revisions made to the Land Use Policies and Water Supply and Conservation Policies relative to SGMA. See revision 87.
182	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-22 through 7-25	Letter to City (No Date)	Refers to Florin Resource Conservation District but does not indicate FRCD area on Figure 7-1	Elk Grove Water District is the water agency and is managed by FRCD. No changes to the map are required.
183	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-27	Letter to City (No Date)	Sufficient width for mowed fire break where necessary. Sufficient width to provide for: Please define sufficient width? Policy what is considered sufficient? Who determines? How determined?	This is determined based upon the corridor, its location, surrounding environment and planned land uses, and other factors, in consultation with Cosumnes CSD Fire. Typically maintenance access is a 40-foot width with a 10-foot paved area as provided in the Improvement Standards. No changes proposed.
184	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-29	Letter to City (No Date)	Policy NR-1-7 Consider adoption of HCP. Please describe expand upon? What HCP's? Who's HCP?	A discussion of the South Sacramento HCP (SSHCP) has been added to page 7-18 for background. See revision 84. No changes to Policy NR-1-7 are proposed as this policy is not limited to the SSHCP. The City may choose to create its own HCP. The City cannot adopt the SSHCP.
185	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-33	Letter to City (No Date)	Policy NR-3-13 discusses and encourages wells ignoring the ground water situation	This is an existing General Plan policy (CAQ-15) and no changes are proposed. Changes to the policy may create conflicts with policies in the Rural Area.
186	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-34	Letter to City (No Date)	Policy NR-4-4 Alternative modes of transportation such as bike and pedestrian multiuse trails will succeed if well planned to include safety i.e. away from automobiles.	Comment noted.
187	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-35	Letter to City (No Date)	NR-4-9 Parks should not and will not be located at edge or boundary of residential tracks and bordering busy roadways.	Comment noted. See the Parks Design Principles for provisions relative to park siting and design.
188	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-35	Letter to City (No Date)	NR-4-10 Zoning is very important and a policy needs to be in place for manufacturing and processing. Flexibility should not be a consideration.	The uses identified in the policy often require a conditional use permit (or similar entitlement) allowing the City to deny them based upon potential conflicts with surrounding uses. No changes are proposed.
189	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-35	Letter to City (No Date)	NR-4-13 This needs to include pesticides and other airborne substances besides objectionable odors.	This policy is exclusive to odors. State standards exist relative to pesticide use. No changes are proposed.
190	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-35	Letter to City (No Date)	Standard NR-4-13a Cite SMAQMD's most current CEQA Guidelines	The relevant SMAQMD document is cited.
191	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-37	Letter to City (No Date)	2nd paragraph "incentivizing private clean energy projects." What does this mean? Describe. Who develops the program? Is this monetary incentive? What fund?	Incentives may include, but are not necessarily limited to, project streamlining, financial incentives, public-private partnerships, partnerships with providers such as SMUD, and density/intensity bonuses. No details on such a program or programs have been developed.
192	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-37	Letter to City (No Date)	NR-6-4 Public/Private partnerships. Will tax payers carry the weight of the partnership? Invest more than 50% of our tax dollars? How will this be monitored? Program?	The policy identified exploration. No details have been developed.
193	Lynn Wheat, Resident	General Plan Chapter 7, Page 7-39	Letter to City (No Date)	1st paragraph "locally environmentally responsible." How about removing Styrofoam packaging? This was not done and the item dropped from the agenda. How about our Civic Center and solar covered parking? This did not happen. What assurances does this General Plan update offer in sustainable practices in the City will be implemented? Where is the policy?	The statement addresses City purchasing and not specific programs and policies. No changes are proposed.
CHAPTER 8: SERVICES, HEALTH AND SAFETY					
194	Michael McLaughlin, Fire Chief, Cosumnes Fire Department	General Plan Chapter 8, Pages 8-36 to 8-41	Letter to City, September 24 2018	Requests several text revisions to the narrative text and policies under the "Adaptable and Resilient Community" and "Fire and Emergency Medical Services" sections for the purpose of clarity, accuracy and consistency with current Cosumnes Fire Department policy. See comment letter in FEIR for complete text.	Comments noted and edits incorporated. See revisions 103, 106, 107, 108, and 109.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
195	Mark Graham, Resident	General Plan Chapter 8	Email to City, September 7 2018	<p>Overall the General Plan Update should be modified to consider and include a significant health hazard that is already here but is threatening to grow exponentially in the next few years depending on decisions that Elk Grove and also the federal government make.</p> <p>The overview of Chapter 8, Services Health and Safety, says on page 8-3: "Maintaining quality of life is one of the most important issues expressed by community members as they consider the future of the City, and it is a visible and central focus for City staff and decision-makers as they manage and adapt to changes in Elk Grove." Maintaining quality of life in Elk Grove must include protecting Elk Grove residents (and visitors) from hazardous electromagnetic radiation, also known as electromagnetic fields, from any source. The source that threatens to become the biggest in a very short time is the spread of cell antennas in the public right of way for the provision of 4G and 5G cell phone information services.</p> <p>As the BioInitiative 2012 said, "Human beings are bioelectrical systems. Our hearts and brains are regulated by internal bioelectrical signals. Environmental exposures to artificial EMFs can interact with fundamental biological processes in the human body. In some cases, this may cause discomfort, or sleep disruption, or loss of well-being (impaired mental functioning and impaired metabolism) or sometimes, maybe it is a dread disease like cancer or Alzheimer's disease. It may be interfering with one's ability to become pregnant, or to carry a child to full term, or result in brain development changes that are bad for the child. It may be these exposures play a role in causing long-term impairments to normal growth and development of children, tipping the scales away from becoming productive adults."</p>	Comment noted. No revisions are proposed.
196	Mark Graham, Resident	General Plan Chapter 8	Email to City, September 7 2018	<p>The City has the power to regulate the operation of cell antennas on any basis and to regulate the placement, construction and modification of them on the basis of health effects.</p> <p>There are two legal bases to note regarding the City's legal right to regulate cell antennas in the public right of way to protect the health, safety and general welfare of Elk Grove residents. One is that federal law does not pre-empt local regulation of the operation of a cell antenna. The other is that federal law does not pre-empt local regulation of the placement, construction, and modification of cell antennas on the basis of health effects.</p> <p>The range of cell antennas is 2,000' to 3,000' according to Verizon. The General Plan Update should take this into account.</p>	Comment noted. No revisions are proposed.
197	Mark Graham, Resident	General Plan Chapter 8	Email to City, September 7 2018	<p>The City should build a municipal fiber optic network. Promote competition for Wireline broadband and video subscription services by enabling all firms the opportunity to offer competing information and video services on one shared Municipal fiber-optic network (similar to what Nicasio and Bolinas are doing). The City should add to the proposed General Plan Update a section saying that it will be the City's goal (intention, purpose, objective) and policy to partner with telecommunications companies to use fiber optics for cell phone services as well as internet services. Fiber optics are much better than 4G or 5G antennas because of the advantages in health impacts and energy efficiency.</p>	Comment noted. The City is not pursuing development of a fiber optic network at this time. However, Policy CIF-3-2 identifies that the City will encourage and coordinate with service providers to utilize advanced technologies such as fiber optic internet. No changes are proposed.
198	Mark Graham, Resident	General Plan Chapter 8, Page 8-47	Email to City, September 7 2018	<p>With regard to health impacts, Policy CIF-3 and what is described here is good. The problem is that this does not go far enough. Fiber optic is the best way to deliver not only internet but also phone services. The City can require telecommunications providers to provide fiber optic for all of these uses. Standard CIF-3-2.a is a step in the right direction but again it does not go far enough. Laying the conduit in new development areas (CIF-3-2.a) is good and necessary. But what about areas already developed? And what about encouraging and coordinating with service providers to use fiber optics for cell phone services? Those two items should be added to the General Plan Update.</p>	Comment noted. The City is not pursuing development of a fiber optic network at this time. However, Policy CIF-3-2 identifies that the City will encourage and coordinate with service providers to utilize advanced technologies such as fiber optic internet. No changes are proposed.
199	Mark Graham, Resident	General Plan Chapter 8	Email to City, September 7 2018	<p>What I think should be the City's goal is to keep health and safety in mind when updating the General Plan. According to thousands of non-industry funded or influenced scientific studies, long term exposure to non-ionizing radiation such as from cell towers, cell antennas, cell phones, smart utility meters, baby monitors, Wi-Fi, etc. causes a wide range of health impacts. Long term exposure to non-ionizing radiation really is hazardous to our central nervous systems, our immune systems, and every cell in our bodies.</p> <p>Fiber optics, on the other hand, present zero health hazards simply because there is no antenna and no electromagnetic radiation. The data travels entirely within a glass cable that is typically buried in the ground. Using fiber optics for cell antenna infrastructure completely avoids all of the health impacts of long term exposure to non-ionizing radiation.</p>	Comment noted. No revisions are proposed.
200	Mark Graham, Resident	General Plan Chapter 8, Page 8-9 and 8-13	Email to City, September 7 2018	<p>Goal ER-1 is good but it does not go far enough because it omits consideration of a significant source of health hazard to Elk Grove residents; namely, long term exposure to non-ionizing radiation from 4G and 5G cell antennas.</p> <p>This should be covered by Goal EM-1 under "Release of toxic or hazardous substances that are used by commercial and industrial businesses." Telecommunications companies are commercial businesses. A reasonable and sufficiently broad definition of a "substance" would include electromagnetic radiation. Limiting the definition of a "substance" to something tangible is artificial and arbitrary and fails to account for a real, ubiquitous hazard.</p>	Comment noted. The City is not in a position to regulate these emissions pursuant to Federal law and regulation. No revisions are proposed.

General Plan Update - Public Comment Tracking Sheet - As of January 4, 2019

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
201	Mark Graham, Resident	General Plan Chapter 8, Page 8-8	Email to City, September 7 2018	Policy EM-1-1 is good and should be interpreted to recognize the safety hazards of long term exposure to EMF. This policy as written in the proposed General Plan Update says, "Policy EM-1-1: Seek to maintain acceptable levels of risk of injury, death, and property damage resulting from reasonably foreseeable safety hazards." It is unsafe for a person to be exposed in the long term to EMF. Some of the health impacts that occur relatively soon are headaches, insomnia, tinnitus, dizziness, and heart palpitations. Some of the longer-term health impacts are cancer risk, cellular stress, increase in harmful free radicals, genetic damages, learning and memory deficits, and structural and functional changes of the reproductive system. Each of these is an injury.	Comment noted. The City is not in a position to regulate these emissions pursuant to Federal law and regulation. No revisions are proposed.
202	Mark Graham, Resident	General Plan Chapter 8, Page 8-9 and 8-11	Email to City, September 7 2018	The definition of hazardous materials is good, but it does not go far enough to protect Elk Grove residents from real hazards. It should be interpreted to include long term exposure to non-ionizing radiation such as from 4G and 5G cell antennas. Or, if the City does not agree that EMF is a "material" then the City should broaden this definition, redefining it to explicitly include EMF. This would be better as it would eliminate any potential ambiguity as to whether EMF is a "material". Furthermore, 4G and 5G cell antennas should be recognized as "hazardous facilities" per Policy ER-1-3.	Comment noted. The City is not in a position to regulate these emissions pursuant to Federal law and regulation, which occupies the field in this regard. No revisions are proposed.
203	Mark Graham, Resident	General Plan Chapter 8, Page 8-10	Email to City, September 7 2018	Table 8-1 should be modified to include risks other than the risk of death. While it is a good policy goal to minimize the risk of death over any number of days of exposure to a hazard, death is not the only bad outcome. Injury, especially long-term injury that does not heal or does not heal well, is another bad outcome. The City should be committed to preventing injury as well as death. Table 8-1 should be modified by adding a column titled, "Risk of significant injury over 365 days of exposure."	Comment noted. The City is not in a position to regulate these emissions pursuant to Federal law and regulation, which occupies the field in this regard. No revisions are proposed.
204	Mark Graham, Resident	General Plan Chapter 8, Page 8-12	Email to City, September 7 2018	Table 8-2, "Policy Threshold of Exposure Criteria for Agricultural, Residential and Non-Residential Land Uses," should be modified to account for electromagnetic fields. Either by defining EMF to be an airborne toxic substance or by adding another column to the table called "Electromagnetic Radiation" or "Electromagnetic Fields". The basis for so modifying Table 8-2 is already reflected in the units used to measure radiant heat for residential land uses, which are: Target radiant energy = 6.67 kW/m ² . Typically the EMR or EMF from a cell antenna is measured in microwatts per square meter.	Comment noted. The City is not in a position to regulate these emissions pursuant to Federal law and regulation, which occupies the field in this regard. No revisions are proposed.
205	Mark Graham, Resident	General Plan Chapter 8	Email to City, September 7 2018	The City should update the General Plan to protect Elk Grove residents against long term exposure to non-ionizing radiation from 4G and 5G antennas in the public right of way. Several cities in Northern California have already taken strong action to so protect their residents (and the cities' rights and interests). Others are in the process of doing so. The City of Petaluma recently passed (July and August 2018) an ordinance that Elk Grove should use as a model as it updates its General Plan. If and to the extent that the provisions of such an ordinance are too specific to be in the General Plan Update, the Update should be as specific as possible, should include as many of these provisions as possible, and should at least incorporate the principles on which these provisions are based. This ordinance created a minimum setback of 500 feet from any home as well as 1,500 from any other WTF. However, the City of Elk Grove can improve on this, can do a better job regulating. It can do so by regulating the operation of a WTF both in terms of the signal strength and power flux density. For example, the City could adopt an ordinance amending the municipal code to set as requirements for the permitting of WTFs, among other things, two parameters. The permitted equipment of any CPMRA-WTF will be such that its capacity, when adjusted to maximum output in any and all parameters, will be no greater than either of the following: The signal strength may not exceed the level that is necessary for telecommunications service (the ability to make a call or text). This would be no higher than -75 dBm for any individual marketed frequency (i.e. 700 MHz, 1900 MHz or 2100 MHz). The telecommunications industry already admits that this is great signal strength. The latter level is a peak radiofrequency microwave radiation power flux density of 10 μW/m ² for all frequencies from 27 MHz through 3000 MHz. (microwatts per square meter). Ten times that is 100 of the same units.	Comment noted. The City is not in a position to regulate these emissions pursuant to Federal law and regulation, which occupies the field in this regard. No revisions are proposed.
206	Sharon Lynes, Resident	General Plan Chapter 8, Pages 8-57 and 8-58	Letter to City (No Date)	Please allow the Sheldon Rural Area to have a separate outdoor noise level criteria different from the urban area. (dB's)	The City cannot create two different standards for noise levels.
207	Suzanne Pecci, Resident	General Plan Chapter 8, Page 8-42	Oral comment, Planning Commission Workshop #1, September 6 2018	Note that two water agencies (Elk Grove Water Service and Sacramento County Water Agency) are stated as public but one of them is now private. EGWS is actually a private corporation.	Elk Grove Water District (the current name of the utility) is a department of the Florin Resource Conservation District, which is a public agency. No changes are proposed.
208	Suzanne Pecci, Resident	General Plan Chapter 8, page 8-42	Oral comment, Planning Commission Workshop #1, September 6 2018	Standard INF-1-1.a: "permitted by State law" – please include the actual code reference.	Comment noted. While the specific citation will not be added to the General Plan, the commenter is directed to California Government Code Section 66473.7.
209	Suzanne Pecci, Resident	General Plan Chapter 8, Page 8-43	Oral comment, Planning Commission Workshop #1, September 6 2018	Policy IFP-1-3: There is no reference to the Sustainable Groundwater Management Act (SGMA).	The comment incorrectly referred to Policy IFP-1-3, but was intended to refer to Policy INF-1-3. Revision incorporated. See revision 111.
210	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-9 and 8-13	Oral comment, Planning Commission Workshop #1, September 6 2018	Risk potential needs to be refined as they really relate to the suburban propane tanks. Local Hazard Mitigation Plan may not fully address the risk, either.	Comment noted. Draft policies address risk analysis related to Suburban Propane. No changes proposed.

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Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
211	Lynn Wheat, Resident	General Plan Chapter 8, Pages 8-13 and 8-14	Oral comment, Planning Commission Workshop #1, September 6 2018	Transport of hazardous materials through the City. City should have more discretion/control over what comes through.	The City does not have authority over the transport of hazardous materials through the City except to the extent it relates to its land use authority in citing a new facility. Otherwise, such transport is regulated by the State and Federal government. No changes proposed.
212	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-42	Oral comment, Planning Commission Workshop #1, September 6 2018	Exemption of model homes from utility requirements should be removed.	This exemption is a matter of State law and is provided in Government Code Section 66499.30(a) and (b). No changes are proposed.
213	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-43	Oral comment, Planning Commission Workshop #1, September 6 2018	INF-1-3: The City is not a water purveyor.	This policy does not relate to the City's status as a water purveyor. It has applicability to storm water runoff and other water-related matters which are within the purview of the City. No changes proposed.
214	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-55	Oral comment, Planning Commission Workshop #1, September 6 2018	CS-1-1: Cooperate with the Sacramento Public Library Authority in the planning, financing, and implementation of...	Comment noted. Revision incorporated. See revision 121.
215	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-57 and 8-58	Oral comment, Planning Commission Workshop #1, September 6 2018	Noise levels should reference CNEL.	The draft utilizes Ldn as the noise measurement standard. This measurement is an average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of 10 decibels to sound in the night after 10 pm and before 7 am. No changes are proposed.
216	Constance Connelly, Proxy for Lynn Wheat (Resident)	General Plan Chapter 8, Page 8-40	Oral comment, Planning Commission Workshop #1, September 6 2018	EMS – Emergency response time – 12 minutes is too long in rural area.	Comment noted. Cosumnes CSD has provided revised text for this section of the plan. See revision 108.
217	Constance Connelly, Proxy for Lynn Wheat (Resident)	General Plan Chapter 8, Page 8-38	Oral comment, Planning Commission Workshop #1, September 6 2018	ER-6-4: Address what trees and how far apart for longevity? To prevent having to just remove some down the line.	Comment noted. The Zoning Code addresses these types of standards, generally noting a 30-foot separation between trees. Standards may vary by tree species.
218	Constance Connelly, Proxy for Lynn Wheat (Resident)	General Plan Chapter 8, Page 8-50	Oral comment, Planning Commission Workshop #1, September 6 2018	Policy IFP-1-4: "Using City funds directly, with repayment from future development fees". Concerned about the City going into the savings and loan business.	This comes from an existing General Plan policy and the City has completed efforts using this model. The SEPA sewer lift station was partially financed with an interfund loan that will be repaid from sewer impact fees collected within the service area. No changes are proposed.
219	Sharon Lynes, Resident	General Plan Chapter 8, Page 8-9 and 8-13	Oral comment, Planning Commission Workshop #1, September 6 2018	Propane tanks – a concern remains about potential risks.	Comment noted.
220	Sharon Lynes, Resident	General Plan Chapter 8, Page 8-57 and 8-58	Oral comment, Planning Commission Workshop #1, September 6 2018	Noise levels – they don't recognize the rural area – 60 dB is too high. 50 dB is required for the Sheldon Inn. Reflect the difference in policies. Wants a separate noise level for the rural area.	Comment noted. Ambient noise levels in the Rural Area are currently over 55 Leq. See page 5.10-21 of the DEIR. Sixty dB represents normal conversation at three feet. No changes are proposed.
221	Sharon Lynes, Resident	General Plan Chapter 8, Pages 8-56 to 8-63	Oral comment, Planning Commission Workshop #1, September 6 2018	Indoor noise pollution (e.g., hand dryers in bathrooms). Can the City regulate as some are way too loud.	The General Plan noise standards relate to the noises generated by a use coming inside the building of another use. Noise internal to a use is generally not regulated by the City. It may be subject to State or Federal regulation, such as occupational safety regulations. No changes are proposed.
222	Nancy Castanetti, Resident	General Plan Chapter 8, Pages 8-53 to 8-55	Oral comment, Planning Commission Workshop #1, September 6 2018	Wants to see more concrete plans for livability, sense of community, more walkable. Need more stringent standards for health and well-being.	Comment noted. The General Plan provides policies to guide decision making. Specifics of implementation occur through individual projects, studies, master plans, and similar efforts. The City may explore these topics in more detail through one of more of those efforts, such as the recently completed Library and Cultural Arts Master Plan. Also see the upcoming update to the Bicycle, Pedestrian, and Trails Master Plan. No changes are proposed.
223	Mackenzie Wieser, Planning Commissioner	General Plan Chapter 8, Pages 8-56 to 8-63	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Explore potential noise policies for rural area	Draft EIR Chapter 5.10 looks at existing and potential future noise conditions. Specifically, Table 5.10-6 looks at existing ambient noise levels. Station ST-11, for example, is a site in the Rural Area long Sheldon Road and has noise level of 55.9 dBA. This can be compared with Station ST-13, for example, which is along Big Horn Boulevard in the urban part of the City and has an ambient measurement of 50.6 dBA. Additionally, Station ST-2 in the East Elk Grove area (urbanized portion) has a measurement of 57.7, and Station ST-7, in the Laguna West Area has a measurement of 57.6. Therefore, there is no evidence that a separate standard should be established for the Rural Area. No changes are proposed.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
224	George Murphey, Planning Commissioner	General Plan Chapter 8, Page 8-8	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy EM-1-1: Questions if it should be a "reduction" in risk as opposed to a "maintenance".	Risk reduction can only occur through the elimination of existing uses/activities which pose a risk. The City has not identified a policy to eliminate existing uses; therefore, "maintenance" is the correct word. No change proposed.
225	George Murphey, Planning Commissioner	General Plan Chapter 8, Page 8-31	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy ER-2-14: Use of word "party" – check to see if another term would be better.	Changed to "entity". See revision 99.
226	George Murphey, Planning Commissioner	General Plan Chapter 8, Page 8-32	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy ER-2-18: Change "should" to "shall"	Revision made. See revision 102.
227	George Murphey, Planning Commissioner	General Plan Chapter 8, Page 8-32	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy ER-2-15: "will" or "shall"?	Generally when the City does something it "will." When the City compels someone to do something the correct word is "shall." No change proposed.
228	George Murphey, Planning Commissioner	General Plan Chapter 8, Page 8-32	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy ER-2-17: Have a similar issue in the rural area. Should ensure that there are no issues related for rural drainage as well.	The word "urban" has been deleted. See revision 101.
229	George Murphey, Planning Commissioner	General Plan Chapter 8, Page 8-45	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy INF-2-4: Check to see that there is some acknowledgement that there are existing lots under 2 acres in the rural area.	The following language from the existing General Plan has been incorporated back into the policy: "This policy shall not apply to lots smaller than 2 gross acres within the Rural Area Community Plan that existed as legal lots as of November 19, 2003 and these lots shall not be required to connect to public sewer service as a condition of development." See revision 114.
230	George Murphey, Planning Commissioner	General Plan Chapter 8, Page 8-46	Commissioner Comments, Planning Commission Workshop #1, September 6 2018	Policy CIF-2-1: Cross reference wit LU standard requiring underground of 69kV lines.	Cross reference to LU-5-3.b added. See revision 115.
231	Karen Kreig	General Plan Chapter 8	Oral comment, Planning Commission Workshop #3, October 4 2018	References Sheldon Inn re: amplified events. Why are decibel levels the same as in the city? Should be a different standard.	The City cannot create two different standards for noise levels.
232	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-3	Letter to City (No Date)	Was not a general plan amendment and rezone adopted to provide for hospital facilities in the Laguna Ridge Specific Plan? This needs to be cited in document.	Development approvals were provided for a hospital in the Laguna Ridge Specific Plan as well as a site at Monetta Drive and Big Horn Boulevard; however no such facilities have been constructed. Once a hospital has been constructed in the City the background discussion in the General Plan may be updated.
233	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-3	Letter to City (No Date)	Last paragraph "city focuses on reducing risks to acceptable levels" What does this mean exactly; who makes determination of "acceptable"? Is this graded on a scale as the City's previous LOS for roads? A-D and D or better was acceptable for traffic?	Risk reduction in the context of this statement includes both reduction of risks, such as through flood control projects, and maintenance of risk through management of land uses. In the case of flood issues, see the policies relative to required improvements and limits on development within flood plains. Relative to land use risks, see policies on acceptable risk levels. No changes proposed.
234	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-4	Letter to City (No Date)	Proactive programs? Define this. What is a proactive program?	Proactive programs can include education activities, such as fire safety or personal safety. A example would be the annual Safety Town program produced by Elk Grove Police Department.
235	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-6	Letter to City (No Date)	Include in appendix of document Annex B of Sacramento Local Hazard Mitigation Plan with the General Plan Update and review annually with the general plan annual growth report to City Council.	Comment noted. This is a separate document that is updated by regional agencies pursuant to State and Federal law. It should not be an integrated part of the General Plan. No changes proposed.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
236	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-8	Letter to City (No Date)	Targets; Needs to address Suburban Propane with more detail and previous history. Need to address placing a fire station within the "blast zone" and ability of the First Responders availability.	Comment noted. Citing of Cosumnes CSD Fire Headquarters and Training Facility was determined by the Cosumnes CSD Board and was not a City decision. Assignment of first responders to an incident and their direction of travel is determined at the time of the incident. No changes proposed.
237	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-9	Letter to City (No Date)	Terrorism risk; past incident "not could have" loss of life, studies indicated "would have" loss of life. Outdated research relied upon for this document. Studies need to be current and relevant to the current year.	Comment noted. The City is not aware of any changes in operation at the Suburban Propane facility that would cause the analysis to be out of date.
238	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-10	Letter to City (No Date)	Table 8-1 (Acceptable probability of public risk) needs to cite basis for proposed risk levels. The table appears to set arbitrary levels and does not give relative comparisons to other cities in order to gauge degree of risk protection when making land use decisions. The Major Industrial Accidents Council of Canada was referenced as a source to determine probability of reasonably foreseeable risks. Cite or include United States of America sources. Does Canada's reasonably foreseeable risks to individuals by land use support the high level of safety Elk Grove residents should be assured to have living in the suburban community?	See the green box on page 8-10, which notes that the City determined maximum acceptable exposures to risk based on the Risk-Based Land Use Planning Guidelines published by the Major Industrial Accidents Council of Canada. Staff is not aware of a comparable standard from US sources. However, the 1 in one million standard used in the General Plan is similar to the Federal standard for risk of exposure to carcinogens and in line with standards from the World Health Organization. See http://www.who.int/water_sanitation_health/dwq/iwachap10.pdf . No changes are proposed.
239	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-12	Letter to City (No Date)	Table 8-2 (Thresholds of acceptable exposure) needs to cite basis for proposed threshold levels. The table appears to be arbitrary and does not give relative comparisons to other cities in order to gauge degree of risk protection when making land use decisions.	The General Plan sets the City policy and is not a background document on what other jurisdictions require. As identified in the box on page 8-10, the City determined maximum acceptable exposures to risk based on the Risk-Based Land Use Planning Guidelines published by the Major Industrial Accidents Council of Canada. No changes are proposed.
240	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-13	Letter to City (No Date)	Standard ER-1-4a: "Sufficient to protect public safety". "Sufficient to protect safety of which will be determined by the city." How is it determined? What are the specific guidelines?	This determination is made based upon the standards in Tables 8-1 and 8-2. No changes are proposed.
241	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-13	Letter to City (No Date)	Policies of Transport of Hazardous Materials. This needs to include rail transport through city and to what extent the city can legally identify the materials and mitigate impact to the extent possible.	The City does not have authority over the transport of hazardous materials through the City except to the extent it relates to its land use authority in citing a new facility. Otherwise, such transport is regulated by the State and Federal government. No changes proposed.
242	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-17	Letter to City (No Date)	Where is figure 82?	This should read "Figure 8-2." See revision 95.
243	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-21	Letter to City (No Date)	"The City's supplemental 200-year floodplain calculations use a scenario in which the levees and dams along the Sacramento and American Rivers do not fail". What would it look like if they fail? Needs to show best and worst possibilities. What would happen to north Elk Grove? Laguna West?	A failure of Folsom Dam is shown in Figure 8-3. As discussed two paragraphs later in this section, the mapping in Figure 8-2 does include a failure of the levee system on the Sacramento River. The sentence will be clarified this. See revision 97.
244	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-22	Letter to City (No Date)	Figure 8-2 Where are the essential Service Facilities located on map?	Figure 8-2 will be updated to show the essential facilities. See revision 96.
245	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-23	Letter to City (No Date)	"...on one of the tributaries along the Cosumnes River has the potential to cause human injury or loss of life in Elk Grove." Identify exact location and name of tributary.	The sentence has been revised for clarity. See revision 98.
246	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-30	Letter to City (No Date)	Policy ER-2-6: Clustering onto a portion of site which are not subject to flooding. What is the cumulative impact to such a project? Will residents be landlocked in the clustered portion when surrounding areas are flooding? Will the policy be to allow the roadways to flood as long as the commercial or home structure is out of the flood plain?	See policies ER-2-11 and ER-2-12, which address access to lots in an inundation condition. No changes proposed.

General Plan Update - Public Comment Tracking Sheet - As of January 4, 2019

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
247	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-30	Letter to City (No Date)	Policy ER-2-7: Allowing fill to be used to remove the structure above the flood plain needs to be denied and not just strongly discouraged. Define strongly discouraged? The mayor and city council have approved home sites to be build homes on fill removing the structure from flood plain but not the roadway.	Under the policy, fill is discouraged and may be prohibited based upon the potential impacts to wildlife, habitat, and flooding on other parcels. Where fill has been approved it has been based upon a larger master plan for drainage improvements (see East Elk Grove Specific Plan, Southeast Policy Area). No changes a proposed.
248	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-31	Letter to City (No Date)	Policies are broad and flexible leaving the developers the ability to develop home sites on the flood plain.	Comment noted.
249	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-31	Letter to City (No Date)	The city is supporting flood hazard management. Explain? What does the flood hazard management include? Dams?	This may include a range of improvements including levee improvement, dam improvements, or other facilities. No changes proposed.
250	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-32	Letter to City (No Date)	Policy ER-2-16: There needs to be a period after flood plain. Eliminate: exceeding 1 foot unless analysis clearly indicates that the physical and/or economic use of upstream property will not be adversely affected. (The font is different and I have suspicions of who may have wanted this added).	This is an existing policy. No changes are proposed.
251	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-33	Letter to City (No Date)	First paragraph, spacing last line.	Comment noted and change made.
252	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-38	Letter to City (No Date)	Policy ER-6-3; Valley Vision; describe organization operations and reference in appendix. Business Resiliency Initiative (BRI). How is this initiative implemented? How is the city participating? Is there city general fund monies invested in this organization?	Valley Vision is a regional community organization. For details see https://valleyvision.org/ . This policy was drafted when the BRI was still being developed. The policy has been revised to more broadly address regional collaboration. See revision 104.
253	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-38	Letter to City (No Date)	Policy ER-6-4: Trees and the width of sidewalks needs to be addressed. Are trees compatible? Will trees uproot sidewalks as has occurred in some areas of the city?	Tree plantings need to be selected based upon the available space. This policy is more broad than tree plantings.
254	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-39	Letter to City (No Date)	Florin Resource Conservation District needs to be identified in general plan update for water conservation.	Elk Grove Water District (the current name of the utility) is a department of the Florin Resource Conservation District. The agency name will be updated. See revision 105. No additional revisions proposed.
255	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-40	Letter to City (No Date)	Maintenance and management of a city needs to identify older areas of the city at risk from blight from negligence by city not investing or making it a policy to use a percent of the general fund to repair crumbling sidewalks and roads in neighborhoods.	Funding standards cannot be established in the General Plan based upon State Constitution provisions.
256	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-40	Letter to City (No Date)	Type; 3rd paragraph under what is CPTED "ae"	Comment noted and change made.
257	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-41	Letter to City (No Date)	Policy SAF-1-2: Parks should be constructed within neighborhoods where the neighborhood watches can be the eyes and ears of our police that are unable to be at all places at all times.	See the Parks Design Principles for siting standards for parks.
258	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-42	Letter to City (No Date)	Is it Elk Grove Water Service or Elk Grove Water District?	Elk Grove Water District is the correct name. Staff will do a find/replace throughout to correct errors. See revision 110.
259	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-43	Letter to City (No Date)	All references to model homes being exempt from utility services should be deleted, because in the event of a business failure, the citizens are left with a potential eyesore, nuisance, or transfer of ownership without proper utilities. (INF-1-1.a, INF-2-1.a, INF-2-1.b are examples and may not be all, but ALL need to be deleted).	This exemption is a matter of State law and is provided in Government Code Section 66499.30(a) and (b). No changes are proposed.
260	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-43	Letter to City (No Date)	Policy INF-1-3: The city is not a water purveyor in the region and protection of quality and quantity of groundwater rests with other regional and state agencies.	This policy does not relate to the City's status as a water purveyor. It has applicability to storm water runoff and other water-related matters which are within the purview of the City. No changes proposed.
261	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-43	Letter to City (No Date)	Policy INF-1-4: The city is not a water purveyor in the region and expansion of recycled water infrastructure should be left to the approved water purveyors in the region.	Noted. See proposed revision 112.
262	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-44	Letter to City (No Date)	Policy INF-2-1.a: Remove "excluding subdivisions" if infrastructure and the other requirements are required of other development projects it should and needs to be required of subdivisions. Excluding subdivisions is not busy friendly for all.	This is existing General Plan policy and is consistent with the Subdivision Map Act (State law). No revisions proposed.
263	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-50	Letter to City (No Date)	Policy INF-1-4: Using city funds directly with repayment of developer fees is a poor policy as it does not assure the fees collected at a later date will be sufficient. The city taxpayers should not be acting as the bank for developers as market conditions may compromise the health of the city's budget should a developer declare bankruptcy.	This comes from an existing General Plan policy and the City has completed efforts using this model. The SEPA sewer lift station was partially financed with an interfund loan that will be repaid from sewer impact fees collected within the service area. No changes are proposed.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
264	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-52	Letter to City (No Date)	Policy IFP-1-9: Eliminate "Interim facilities may be used only if specifically approved by the City Council". Interim/length of time for interim could give a sense of permanence as the deadline permanent facilities could be never. This could be create just what is wanting to be avoided; leapfrogging. Leapfrogging with interim; asphalt sidewalks...etc...	This refers to interim facilities such as drainage facilities, roadways, and water and sewer facilities. This will be clarified in the policy. See revision 119.
265	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-54	Letter to City (No Date)	Describe the city's Incentive plan? Strategies, goals and cost to taxpayers. In considering incentives of taxpayer dollars the taxpayers need to be included in decision making process neighborhood by neighborhood.	This refers to policy HTH-1-6. This may include event sponsorship, providing access to venue space, or marketing assistance. No changes are proposed.
266	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-54	Letter to City (No Date)	In supporting farmer's markets do not limit the city newsletter to just the old town farmer's market. Include the farmer market at Laguna and Big Horn.	Comment noted.
267	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-54	Letter to City (No Date)	Policy HTN-1-7: Include in this policy urban farming.	Comment noted. See revisions in 120. Also see policy AG-2-2 relative to urban farming.
268	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-55	Letter to City (No Date)	Policy CS-1-1 Amend to read, Cooperate with the Sacramento Public Library Authority in the planning, financing, and implementation of future library facilities.	Comment noted. Revision incorporated. See revision 121.
269	Lynn Wheat, Resident	General Plan Chapter 8, Page 8-57 and 8-58	Letter to City (No Date)	Table 8.3 Maximum Allowable Noise Exposure: Amend interior space column from LDN to CNEL, since it gives a greater nighttime penalty for those sensitive uses. All other text references to sensitive interior noise levels should also reference CNEL.	The draft utilizes Ldn as the noise measurement standard. This measurement is an average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of 10 decibels to sound in the night after 10 pm and before 7 am. No changes are proposed.
CHAPTER 9: COMMUNITY AND AREA PLANS					
270	Diane Owen, Resident	General Plan Chapter 9, Page 9-23	Email to City, October 4 2018	Figure SRA-1 Sheldon/Rural Area Land Use Map: Please explain if that is a Public Services line on Figure SRA-1 running through the rural area, the commercial area of Sheldon to Wilton, and if it is a water/sewer interceptor. And, if so, is there currently a committed easement established.	The blue line on the figure is the California Central Traction rail line.
271	Diane Owen, Resident	General Plan Chapter 9, Page 9-24	Email to City, October 4 2018	Policy SRA-2-1: Prohibit the extension of sewer service into the Sheldon/Rural Area. Lots in the Sheldon/ Rural Area shall (not should) be large enough to accommodate septic systems.	Comment noted and revision incorporated. See revision 135.
272	Diane Owen, Resident	General Plan Chapter 9, Page 9-24	Email to City, October 4 2018	Policy SRA-2-4: Prohibit (not limit) the extension of water service into the Sheldon/Rural Area. Lot sizes shall (not should) be large enough to accommodate private water wells.	This is existing General Plan policy and is recommended to retain as written based upon potential future issues with water contamination from septic systems. No changes proposed.
273	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-19	Letter to City (No Date)	The words "curbs and gutters" should be added to the paragraphs referring to the rural area under Plan Setting.	Comment noted and revision incorporated. See revision 127.
274	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-20	Letter to City (No Date)	Sheldon/Rural Area Community Plan - Preservation of the Rural Lifestyle and Heritage. Add a new bullet point #5 to continue to prohibit public water services in the rural area. (allow only private wells)	This is existing General Plan policy and is recommended to retain as written based upon potential future issues with water contamination from septic systems. No changes proposed.
275	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-22	Letter to City (No Date)	Policy SRA 1-1-2 bullet point #3 Please change the word "ensure" to "require". Also continue the sentence and add "with no less than 2+ acre parcels allowed".	Comment noted and revision incorporated. See revision 130.
276	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-23	Letter to City (No Date)	Add Policy SRA-1-8 Prohibit "clustering" in the Sheldon Rural Area and the North Study Area.	The clustering provision relative to the Rural Area is being removed (i.e., clustering will be prohibited in the Rural Area). See revision 90. No additional policies in the Rural Area Community Plan are necessary.
277	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-23	Letter to City (No Date)	Add Policy SRA-1-9 Prohibit Gated neighborhoods and communities in the Sheldon Rural Area and the North Study Area.	This has been added as Policy RA-1-8. See revision 133.
278	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-24	Letter to City (No Date)	GOAL SRA-2 (1st paragraph) - Delete the words "or small combined" and change "Most" to "All".	Revised to read "...rather, parcels utilized septic systems." See revision 134.
279	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-24	Letter to City (No Date)	Policy SRA-2-1 Delete this sentence: "this Polity shall not be construed to limit the ability of any sewer agency to construct interceptor lines through or adjacent to the Sheldon/Rural Area, provided that no trunk or service lines are included." (also in DEIR 5-12-27)	Staff recommends against this change as Sewer agency planning calls for future interceptor lines that connect development in the County north of the Rural Area with the Regional Plant. These lines would not provide for local service in the Rural Area.
280	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-24	Letter to City (No Date)	Policy SRA-2-4 Please change the word "Limit" to Prohibit the extension of the water service into the Sheldon Rural Area. Delete this sentence: "This policy shall not be construed to limit the ability of any water agency to construct lines through or adjacent to the Sheldon Rural Area". (also in DEIR 5.12-27)	Staff recommends against this change as water quality issues may require public infrastructure in the future.
281	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-24	Letter to City (No Date)	Policy SRA-2-5 Delete "should be" and replace with "shall be". Add the words "2+ acre parcels that are large enough to accommodate private water wells with adequate spacing to minimize the potential for groundwater contamination with septic system."	Comment noted and revision incorporated. See revision 137.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
282	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-25	Letter to City (No Date)	Policy SRA-4-1 The Sheldon town area already has design guidelines and A "Rural Commercial" (RUC) combined land use zone, which were done years ago. Please reference these documents in the General Plan.	Comment noted. See revision 138 noting City regulations relative to the area.
283	William Myers, Sheldon Community Association	General Plan Chapter 9, Page 9-19	Email to City re: PC Workshop #3, October 4 2018	Plan setting section - The first line of the second paragraph should read: "The Sheldon/Rural Area as a matter of policy lacks the infrastructure typically found in an urban or suburban community, such as sidewalks, curbs and gutters, and widened, improved roads."	Comment noted and revision incorporated. See revision 127.
284	William Myers, Sheldon Community Association	General Plan Chapter 9, Page 9-20	Email to City re: PC Workshop #3, October 4 2018	Guiding Principles - Insert as the third bullet point (immediately after the current second point, about maintaining agriculture): <ul style="list-style-type: none"> Promote conservation and restoration of native flora and fauna and of both surface and ground water resources. <p>We would point out that SCA includes conservation as an inherent part of its rural definition and mission--equal in importance to its agricultural heritage, maintaining highly active involvement especially in arborization and surface and subsurface water conservation in the area. We strongly insist that conservation be recognized as an objective equal to that of maintaining the agricultural heritage. The current third bullet point should be rephrased to read as follows: <ul style="list-style-type: none"> Create and foster agriculture and conservation-related community activities and educational events. </p>	Comment noted and revision incorporated. See revision 128.
285	William Myers, Sheldon Community Association	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	SCA and GSREHA together sponsor a widely recognized annual oak tree planting event that has been granted a "tree hero" award from the Sacramento Tree Foundation. We have also been very active in protecting creeks running through the area. We also lobbied hard to convince Public Works to make conservation that topic of artwork on the new roundabout at Sheldon and Bradshaw roads. A lot of attention has also been focused on conserving old structures and the historic look of the commercial area. This conservation value is very important to us.	Comment noted. No changes proposed.
286	William Myers, Sheldon Community Association	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	Because both SCA and GSREHA have from the outset consistently insisted that the rural area be exempted from both water and sewer services, we request that the current fourth bullet point be changed to read as follows: <ul style="list-style-type: none"> Continue to prohibit urban sewer and water services in the rural area. <p>There is at this time no justifiable reason to prohibit city sewers but to permit water service. Moreover, even the possible threat of forcing urban water services on rural properties is enough to discourage cultivation of fruit or nut trees and other agricultural activities that city water prices would immediately render uneconomic. To protect the rural lifestyle, the General Plan must clearly prohibit urban services of both sewer and water.</p>	Staff recommends against this change as water quality issues may require public infrastructure in the future.
287	William Myers, Sheldon Community Association	General Plan Chapter 9, Page 9-22	Email to City re: PC Workshop #3, October 4 2018	LAND USE PLAN: POLICIES: LAND USE GOAL SRA-1: AN ESTABLISHED RURAL COMMUNITY. The last sentence of this paragraph should read: "Policies that recognize and support the continuation of this rural lifestyle and agricultural and conservation heritage are necessary to preserve the character of this area."	Comment noted and revision incorporated. See revision 129.
289	William Myers, Sheldon Community Association	General Plan Chapter 9, Page 9-23	Email to City re: PC Workshop #3, October 4 2018	Policy SRA-1-5. The last words of this paragraph should read "agricultural and conservation activities".	Comment noted and revision incorporated. See revision 131.
290	William Myers, Sheldon Community Association	General Plan Chapter 9, Page 9-24	Email to City re: PC Workshop #3, October 4 2018	Policies: Water Service Policy SRA-2-4. The first sentence of this paragraph should read: "Prohibit water service into the Sheldon/Rural Area." The penultimate line should read "...of any water agency to construct transit only lines through or...."	Comment noted. No changes to the first sentence are proposed at this time. The third sentence is revised to clarify that water agencies may construct transmission lines. See revision 136.
291	William Myers, Sheldon Community Association	General Plan Chapter 9, Page 9-24	Email to City re: PC Workshop #3, October 4 2018	Policy SRA-2-5 - This item is unnecessary. Spacing of wells in situations such as those prevailing in Sheldon have nothing to do with amount of groundwater excavation, which is determined by well and pump size.	Revised to refer to groundwater contamination. See revision 137.
292	William Myers, Sheldon Community Association	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	GOAL SRA-4 RURAL NEIGHBORHOOD CENTER Policy SRA-4-1 This item should conclude with the following added phrase: "...and the various city ordinances regulating development in the area."	Revised to read "...and the various City regulations relative to development in the area." See revision 138.
293	Mike Padilla	General Plan Chapter 9, Pages 9-26 to 9-32	Oral comment, Planning Commission Workshop #3, October 4 2018	Identify the Triangle area as a separate area to recognize its uniqueness. It gets lost when integrated into the Eastern Elk Grove Community Plan, which has a separate character.	The introduction to the Eastern Elk Grove Community Plan has been revised and a new policy added to address the Triangle Area. See revision 139.
294	Shirley Lynn, Resident	General Plan Chapter 9	Oral comment, Planning Commission Workshop #3, October 4 2018	Rename Sheldon Rural Area to Rural Area	Comment noted and incorporated. All policies retitled RA from SRA. See revisions 4 and 5.
295	Shirley Lynn, Resident	General Plan Chapter 9	Oral comment, Planning Commission Workshop #3, October 4 2018	No clustering in the Rural Area	The clustering provision relative to the Rural Area is being removed (i.e., clustering will be prohibited in the Rural Area). See revision 90. No additional policies in the Rural Area Community Plan are necessary.
296	Shirley Lynn, Resident	General Plan Chapter 9	Oral comment, Planning Commission Workshop #3, October 4 2018	Rural circulation standards and design	Comment noted. Addressed through policy 3-1. No revisions proposed.
297	Shirley Lynn, Resident	General Plan Chapter 9	Oral comment, Planning Commission Workshop #3, October 4 2018	Sheldon between Elk Grove and Waterman – add in cushions on Sheldon.	Comment noted. No revisions proposed.
298	Frank Maita, Planning Commissioner	General Plan Chapter 9, Page 9-20	Commissioner Comments, Planning Commission Workshop #3, October 4 2018	Need clarification on conservation (reference Bill Myers' comments for context - comments #208, 209, 211,212).	See prior comments/revisions.
299	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-20	Oral comment, Planning Commission Workshop #3, October 4 2018	Add 5th bullet – Continue to prohibit public water service in the Rural Area (private wells only).	This is existing General Plan policy and is recommended to retain as written based upon potential future issues with water contamination from septic systems. No changes proposed.
300	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-21	Oral comment, Planning Commission Workshop #3, October 4 2018	Bullet 3 – what does "land use regulations" mean	This refers to the regulation of the use of land as occurs through the General Plan, the Municipal Code, and other City policies and standards as relevant.
301	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-21	Oral comment, Planning Commission Workshop #3, October 4 2018	Bullet 4 – Glossary defines "development" as urban land development. May need to clarify?	The definition of "development" has been updated. See revision 149.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
302	Sharon Lynes, Resident	General Plan Chapter 9, Page 9-22	Oral comment, Planning Commission Workshop #3, October 4 2018	SRA-1-2 3rd bullet point – “ensure” to “require”. Add “with less than 2 acres allowed”.	Comment noted and revision incorporated. See revision 130.
303	Frank Maita, Planning Commissioner	General Plan Chapter 9	Commissioner Comments, Planning Commission Workshop #3, October 4 2018	Add “and ranching” to farming in SRA?	Comment noted and revision incorporated. See revision 132.
304	Suzanne Pecci, Resident	General Plan Chapter 9, Page 9-19	Email to City re: PC Workshop #3, October 4 2018	First sentence of opening paragraph” Since incorporation, the city has established and affirmed a policy to retain the built and natural character of the Sheldon/ Rural Area...”. Delete built. What is the significance of including the word built? Can it be construed that it only applies to what is built now and excludes building on developed ag res parcels or re-building in the castoff a catastrophic event? Delete Sheldon throughout this section where it relates to the wider and entire Rural Area, the “Rural Area” should be identified as “The Rural Area” and not connote a portion of the Area- specifically Sheldon —with specific and ‘historic’ boundaries which excludes other areas of the long-established Rural Area. Additionally add in the third line ..”provide, rural infrastructure to include wells and septic systems to support it. In the fourth line change to the present tense” The Rural area enjoys level of self-determination and is identified as an area with unique characteristics. (Note use of the past tense implies that what happened in the past will change in the present.)	Built refers to the homes and businesses in the area and is distinguished from the natural character (the water ways, oak trees, and other natural features.” It does not limit the development of new structures, provided they are consistent with the General Plan. The title has been updated.
305	Suzanne Pecci, Resident	General Plan Chapter 9, Page 9-19	Email to City re: PC Workshop #3, October 4 2018	Plan Setting- Paragraph 2 “The Area is not part of the public (add) water/septic system, parcels use privately owned/installed water and septic systems. Residents and businesses in the Area have appropriate, groundwater water rights to access the aquifer beneath their individual parcel for their beneficial use. (it is important that domestic wells use in the rural area not be written into the General Plan as a “continued use somehow being allowed by the City—residents and businesses in the rural have individual legal groundwater rights. Note: I have previously rewritten this section so that it reads more accurately to reflect the mandated use of wells and septic systems throughout the rural area, included those developed parcels that have as yet not been improved.) Also make it clear that the Area is legally zoned for the agricultural uses and not simply “allowed and encouraged by the City”	Comment noted. No revisions proposed.
306	Suzanne Pecci, Resident	General Plan Chapter 9, Page 9-20	Email to City re: PC Workshop #3, October 4 2018	Guiding Principles - I have a problem with the meaning of the sentence, “As new development occurs, preserving and enhancing the rural lifestyle and heritage is a priority for the community. Be specific about this new development—sounds like it will occur within the rural area—what type and where will this development be— unclear what community we are talking about and change the community to the City—it is a City priority!	In this context it is referring to new development within the Rural Area. This may include homes on 2+ acres with well and septic, or businesses in the Sheldon Town area. No revisions proposed.
307	Suzanne Pecci, Resident	General Plan Chapter 9, Page 9-20	Email to City re: PC Workshop #3, October 4 2018	Support the rural area as a key feature of the community’s identity. This just does not make sense—should rural area be capitalized and community’s also be capitalized? What are we talking about community. Since this is the City’s general plan the sentence makes sense if the Rural Area is a key feature of the City’s identity. The Rural Community needs to have this confirmation by the City in writing of their commitment.	Revised to read “Support the Rural Area as a key feature of the City’s identify.” See revision 128.
308	Suzanne Pecci, Resident	General Plan Chapter 9, Page 9-20	Email to City re: PC Workshop #3, October 4 2018	Next bullet point —change to zoning uses-not related uses.	This would not be the correct use of the term “zoning.” No change proposed.
309	Suzanne Pecci, Resident	General Plan Chapter 9, Page 9-20	Email to City re: PC Workshop #3, October 4 2018	Next bullet point change to “Continue to mandate privately owned well and septic systems.	Comment noted. No revisions proposed.
310	Suzanne Pecci, Resident	General Plan Chapter 9, Page 23	Email to City re: PC Workshop #3, October 4 2018	Figure SRA-1 suggest changing title to Rural Area.	Comment noted and revision incorporated. See revisions 4 and 5.
311	Suzanne Pecci, Resident	General Plan Chapter 9, Page 24	Email to City re: PC Workshop #3, October 4 2018	Goal SRA-2 Context-Sensitive Service. Is there more direct way of naming this Goal?	Staff has reviews and is not proposing any revisions.
312	Suzanne Pecci, Resident	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	Policy SRA-2-1 In sentence change should to shall ” Lots shall be large enough to accommodate septic systems (provide Public Health and county codes in reference section.) Note that in the following sentence “this policy shall not be construed to limit the ability of any sewer agency to construct interceptor lines through or adjacent to the rural area. Mandatory in both cases.	See revision 135.
313	Suzanne Pecci, Resident	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	Discussion where would this interceptor go thru or adjacent to Rural Area and to what location inside? Or outside the rural area would it go—too vague add language to be more specific. According to Figure SRA-1 The proposed interceptor crosses through rural residential, through Sheldon (Feed) down Mooney Road and to Wilton Road into the Omochunnes-Hartnell Water District. The question is, are there current sewer district expansion plans existing at this time which would clarify this Sewer Policy for the rural area residents now during the General Plan process.	Figure SRA-1 shows the California Central Traction rail line. The route of the Regional Sanitation interceptor line has not been finalized. No revisions proposed.
314	Suzanne Pecci, Resident	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	Policy SRA-2-2: The city shall not require the installation of dry sewers as a condition of approval of development. The question is what development ? A house or barn on a vacant lot in the rural area or new urban development or business development in the rural Area/. Be specific. Why should there be a requirement anyway, when a few pages back on page 9-20 in this section sewers were prohibited? The continuing use of “development” continues to lead the reader to ask where? What kind? And inside or outside the rural area particularly in regard to the sewer interceptor going thru and outside the rural area on Figure SRA-1.	Development refers to the construction of new homes and businesses in the area consistent with the General Plan. Dry sewers refer to pipes from the home to the street (and within the street for new subdivisions) for future connection to the regional sewer system. No changes proposed.
315	Suzanne Pecci, Resident	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	Policy mean SRA-2-3 - Unclear what is meant. What kind of residential, suggest changing to read- The City shall not require agriculture-residential development on less than a gross 2 acres....	There are existing 1-acre lots within the Rural Area. This policy creates a legal non-conforming status for them. No changes proposed.

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Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
316	Suzanne Pecci, Resident	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	Policies: Water Service Policy SRA-2-4 : Revise to read- (add) To limit the extension of water service into the rural area, lot sizes shall (not should) be large enough to accommodate private wells.(Reference appropriate Section of the Public Health and Safety Code and Sac County regulation on well and septic placement). The discussion is that if a developed lot is not large enough for placement of a well and septic per referenced laws and codes, and not "grandfathered in" at some previous point in time, this non compliant lot, in order to be developed shall not be the reason to introduce public water (and sewers) to the rural area. The question is are there any of these lots in the rural area and how can they be dealt with in order not to create this situation? Provide an exemption in the General Plan and allow for community wells and septic in these cases or?	Staff recommends against this change as water quality issues may require public infrastructure in the future.
317	Suzanne Pecci, Resident	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	SRA -2-5 Again change to read- "Lots shall (not should) be large enough to accommodate...."	Staff recommends against this change as water quality issues may require public infrastructure in the future.
318	Suzanne Pecci, Resident	General Plan Chapter 9	Email to City re: PC Workshop #3, October 4 2018	Goal SRA-4 Rural Neighborhood Center Change sentence 2 and 3 so they read -The City shall (not should)...continue "to preserve" and..."safeguard"	Generally when the City does something it "will." When the City compels someone to do something the correct word is "shall." No change proposed.
319	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 9, Page 9-20	Email to City re: PC Workshop #3, October 4 2018	The following information reflects a consensus of the residents of GSREHA. Clustering. Guiding Principles. In the Preservation of the Rural Lifestyle and Heritage section. include "Clustering shall not be allowed in the rural area."	The clustering provision relative to the Rural Area is being removed (i.e., clustering will be prohibited in the Rural Area). See revision 90. No additional policies in the Rural Area Community Plan are necessary.
320	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 9, Page 9-21	Email to City re: PC Workshop #3, October 4 2018	Rural Circulation Standards and Design Limitations. Sheldon Road should be two lanes, from Elk Grove-Florin Road to Bradshaw Road, to maintain the existing rural character, as had been designated for Sheldon from Bradshaw Road to Grant Line Road.	Sheldon Road from Elk Grove Florin Road east to Grant Line has been programed as a 2-lane facility. See Figure 3-7.
321	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 9, Page 9-25	Email to City re: PC Workshop #3, October 4 2018	Policies Mobility Improvements. Policy SRA-3-3. Include allowing cushions at (speed bumps) intermittent intervals on Sheldon Road between Elk Grove-Florin Road and Bradshaw Road. These improvements will support improvements necessary to ensure safe, efficient and improved access and help in reducing careless driving and speeding in the Rural Area.	This is a detail level below the General Plan. No revision proposed.
322	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-3	Letter to City (No Date)	Community Plans are updated or expanded based upon the needs of the community over time. How and Who determines the perimeters of the updates? Community plans maybe created and maintained as resources allow. What resources?	Updates to community plans or development of new community plans is determined by the City. Resources refers to staff time and financial resources to support the effort.
323	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-4	Letter to City (No Date)	Vision Statement refers to future light rail/ and or rapid transit. Our current assembly person recently confirmed a comment made several years ago that light rail will not come into Elk Grove within his lifetime...Light rail needs to be removed from the discussion in this general plan update as a viable transportation option.	Comment noted. SEPA reflects adopted Council policy. No revisions are proposed.
324	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-4	Letter to City (No Date)	To describe SEPA as a regional destination does not reflect the city council policy of improving the jobs housing imbalance. SEPA should and must be described as a local destination for both employment and entertainment to the benefit of Elk Grove residents.	Comment noted. SEPA reflects adopted Council policy. No revisions are proposed.
325	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-5	Letter to City (No Date)	Land use: "Providing flexibility in the intensity and density of land uses to respond to changes in economic, market, and social factors while maintaining land use compatibility". The flexibility does not produce sustainable long term safe, healthy, and stability in a community. Responding to the moment in the market and economy is limited for that moment. An example: city rezoned much of the manufacturing and industrial areas that had not been developed, the market recovered with increase demand in the lands the city had zoned away. This was the consequences of flexibility.	Comment noted. SEPA reflects adopted Council policy. No revisions are proposed.
326	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-7	Letter to City (No Date)	Circulation: "Design a circulation system that adequately supports the anticipated level of traffic in the Plan Area" Need a policy in place that clearly defines adequate or insert the Facts of Finding and Overriding Considerations adopted indicating the benefits of traffic gridlock is worth the economic benefit to the City of Elk Grove.	Comment noted. SEPA reflects adopted Council policy. No revisions are proposed.
327	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-7	Letter to City (No Date)	Environment Sensitivity: "Create a self-mitigation plat that, to the extent feasible, incorporates environmental mitigation measures into the project design." Define a self-mitigation plan. What determines extent feasible?	Self-mitigation refers to the ability to mitigate for potential impacts through project design. For example, Shed C is designed to be self-mitigating, providing restored habitat after construction greater in area than what exists today. No changes are proposed.
328	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-8	Letter to City (No Date)	Contextual Compatibilities: How will this be different or improved from what currently exists in the general plan? Complements and Compatible with adjacent properties. What policy supports this? The city approved a gas station with car wash next to (sharing same wall) family homes. Does this meet definition of compatible?	Contextual compatibility occurs at the plan level. For example, SEPA extends roadways established under Sacramento County and in the Laguna Ridge Specific Plan, which creates compatibility. No changes proposed.
329	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-10	Letter to City (No Date)	Standard SEPA-1-2.d Bike Routes and Pedestrian facilities need to be complete segments with connectivity while being separated and protected from the roadways of automobiles, rapid bus, and other motorized vehicles.	See the greenways in the SEPA Special Planning Area, which are Class 1 trails. Some are parallel streets and others are independent of the street system. No changes proposed.
330	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-12	Letter to City (No Date)	Goal SEPA 3, Economic Development: This Goal fails to acknowledge that a worst-case scenario is that while the goal of attracting economic uses will likely lag behind the rate of new residential construction, the jobs-housing imbalance may worsen. The General Plan needs to acknowledge the longer time frame necessary to realize the creation of job producing uses, and to create a policy to discourage amendments of that land use designation that favor non-employment designations that would meet with immediate market demand.	The General Plan does not have a timeframe. Staff is looking at adding additional policies relative to this issue.
331	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-12	Letter to City (No Date)	Policy SEPA-3-1: Explain how verification of the land plan with respect to jobs/housing balance is expected to be provided.	The policy calls for providing acreage for the establishment of one or more business parks. That is provided in the land plan with the north-east business park, the south business park, and the west business park. No changes proposed.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
332	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-12	Letter to City (No Date)	Policy SEPA-4-2: Encourage needs to be changed to require. The following housing types are required to incorporate affordable housing opportunities throughout the community: residential units place above retail uses, live-work housing units, secondary dwelling units, and a mix of duplex and fourplex units within single family residential areas.	This is an inclusionary housing policy that is not consistent with prior Council direction. No changes proposed.
333	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-13	Letter to City (No Date)	Architectural style guidelines for SEPA to the "satisfaction" of the city. What guidelines determine "satisfaction" Define the 'city' in this case. Will it be a city staff person, planning commission, mayor or city council?	This is the Architectural Style Guide for SEPA. Determination is made by the approving authority for the required Design Review application, which may be the Development Services Director, Zoning Administrator, Planning Commission, or City Council.
334	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-13	Letter to City (No Date)	Standard SEPA-5-3a, clarify that amendments are subject to all of the following provisions...following each bullet point, add "and."	All points are currently required. Requested revision made for clarity. See revision 126.
335	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-15	Letter to City (No Date)	Standard SEPA-7-1b, add that if grade separation cannot be achieved, then pedestrian activated crosswalks shall be provided.	This is required by the Improvement Standards. No change proposed.
336	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-15	Letter to City (No Date)	Policy SEPA-7-2 Add: Require that parks are located within residential neighborhoods and removed from major arterials or busy roadways. Corridors and drainage facilities will not be included in the parkland acreage especially those adjacent to the parks.	Corridor and drainage facilities are not included in the parkland calculation. Parks are sited along local and residential collector roads consistent with the Park Design Principles. No revisions proposed.
337	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-18	Letter to City (No Date)	Utilizing a roadway network with a clear, logical hierarchy that is organized on a modified grid. Connectivity to adjacent areas, including potential future development is encouraged. This policy of encouraging has the potential to create piecemeal planning and visual blight. Connectivity needs to be expected not encouraged.	This policy is implemented on page 5-3 of the SEPA Special Planning Area. Connectivity in all instances may not be desired, such as when a trail is provided. No change proposed.
338	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-20	Letter to City (No Date)	Preservation of the rural life style and heritage: It needs to read continue to prohibit urban sewer services and urban water services.	See prior revisions. Sewer service remains prohibited and water services remain consistent with existing policy.
339	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-24	Letter to City (No Date)	Policy SRA-2-4 Limit the extension of water service into the Sheldon/Rural area. Replace the word "limit" with prohibit. It needs to read prohibit the extension of water service into the Sheldon/Rural Area.	Staff recommends against this change as water quality issues may require public infrastructure in the future.
340	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-28	Letter to City (No Date)	Goal EEG-1, Define Residential Communities. Add policies related to sewer service and water service. Include agencies that provide such services.	It is unclear what is being requested. Policies in Chapter 8 address water and sewer service for this area. No changes proposed.
341	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-26	Letter to City (No Date)	First paragraph last sentence; "and the future development areas and the Cosumnes River Corridor to the southwest." What is the Cosumnes River Corridor?	The Cosumnes River corridor is the area encumbered by the Cosumnes River and its tributary, Deer Creek, just southeast of the City.
342	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-30	Letter to City (No Date)	Goal EEG-, Enhanced Stream Corridors and Wetlands. Add further justification of why reconstructed meandering channels are preferred from an environmental standpoint, because it appears that it will serve private developers by maximizing development area. Add note of who will bear the financial responsibility for the reconstruction cost.	Reconstructed channels are often necessary in the Elk Grove area as some corridors have been modified by farming activities over time. Reconstruction returns more natural elements to the corridors. The meandering provides for the slowing of water flows and reduces sediment carry through the water for improved water quality. Reconstruction is a development costs. Language relative to this has been added. See revision 141.
343	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-30	Letter to City (No Date)	"An important aspect of the transmission corridor trail route is the potential for a north-south trail intertie between two other planned off-site regional trails, namely the Laguna Creek trail and the Cosumnes River trail." Where is the Cosumnes River Trail? This needs to be identified on a map and described.	This concept comes from the existing East Elk Grove Specific Plan (see page 5-11). It is likely that such a trail will be constructed when the East Study Area is developed. No revisions proposed.
344	Lynn Wheat, Resident	General Plan Chapter 9, Page 9-31	Letter to City (No Date)	The Appendix of the document needs to include the CCSD's master Plan and the EGUSD master plan.	Staff recommends against this as these plans are updated by separate agencies. References to the plans are appropriate. No changes proposed.
CHAPTER 10: IMPLEMENTATION STRATEGY					
345	Sharon Lynes, Resident	General Plan Chapter 10	Letter to City (No Date)	Table of Implementation Actions Pages 10-11 to 10-66 under "Related Policies and Standards" should show page numbers relating to the specific policy code so the reader can reference it.	Staff has reviewed this and recommends against it as page numbers may change over time. No changes proposed.
346	William Myers, Sheldon Community Association	General Plan Chapter 10	Email to City re: PC Workshop #3, October 4 2018	Suggest the formation of a standing committee of City and rural community personnel to regularly (e.g. semi-annually) review the status of the rural area and to undertake as needed serious study of long term issues of importance that need to be addressed but may not be crisis matters of the moment. We would be open to ideas about how this committee should be structured, but it seems to us it should at a minimum include representation from the two rural community associations, the merchant community, City staff from Planning, Public Works, and Economic Development, and perhaps ex-officio representation from the Planning Commission and City Council.	Staff will propose this to the City Council for consideration. It does not need to be a General Plan action item to be implemented.
347	Shirley Lynn, Resident	General Plan Chapter 10, Page 10-43	Oral comment, Planning Commission Workshop #3, October 4 2018	Delete Implementation Action 8.4 - Sheldon Rural Area Clustering Study	Implementation Action 8.4 is being deleted. See revision 146.

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Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
348	Sharon Lynes, Resident	General Plan Chapter 10, Pages 10-11 to 10-66	Oral comment, Planning Commission Workshop #3, October 4 2018	Implementation Actions table – add page numbers to help with navigation.	Staff has reviewed this and recommends against it as page numbers may change over time. No changes proposed.
349	Sharon Lynes, Resident	General Plan Chapter 10, Page 10-44	Oral comment, Planning Commission Workshop #3, October 4 2018	Pg. 10-44: related – add column?	Related policies and standards are listed in the table. No changes proposed.
350	Shirley Peters, Greater Sheldon Road Estates Homeowners Association (GSREHA)	General Plan Chapter 10, Page 10-43	Email to City re: PC Workshop #3, October 4 2018	The following information reflects a consensus of the residents of GSREHA. Action 8.4. Sheldon Rural Area Clustering Study. Delete statement: Conduct a study to determine appropriate forms of clustering in the Sheldon Area and establish clear guidelines for their implementation.	Implementation Action 8.4 is being deleted. See revision 146.
351	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-3	Letter to City (No Date)	Annual General Plan implementation report and update is under the City Council consent calendar with little to no discussion. A policy should be in place for this to be under Regular Agenda items and open for discussion. Hiding under consent items does not create an open dialog with residents.	This is considered under the agenda review process. No changes are proposed to the draft General Plan.
352	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-4	Letter to City (No Date)	Last paragraph addresses "sub areas" of the city? This needs clarification within the body of the document. Define "sub areas".	Revised to read "...either for a specific topic or for geographic subareas of the City..." See revision 142.
353	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-5	Letter to City (No Date)	Community Plan and SEPA amendments require a 4/5th vote. Is this the same for General Plan? What policy is in place for this?	The 4/5th requirement is specific to employment land uses in SEPA and does not apply to the rest of the General Plan. See policy SEPA-5-3.
354	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-7	Letter to City (No Date)	"City Design Guidelines" which apply to most areas. Needed updated. Where is this in the process or will current guidelines be adopted with this general plan update? A policy needs to be in place regarding the adoption of guidelines. Guidelines need to be cited and included in appendix of this document.	The Request for Proposal for the update to the Citywide Design Guidelines is scheduled to be released in December 2018 or January 2019.
355	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-9	Letter to City (No Date)	Hazard Mitigation and Emergency Management; Continue to dismiss industrial risks and terrorism threats. A policy needs to be in place to address terrorism threats especially with the prior incident.	Comment noted. No revisions proposed.
356	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-10	Letter to City (No Date)	The "time frames" may be adjusted. How? Who determines the need for change? What is the policy? What report would this be found in? If this is all within the zoning code it needs to be stated and the code needs to accompany this document in the appendix.	Time frames may be adjusted by approval of the City Council. As a portion of the General Plan they require formal amendment.
357	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-11	Letter to City (No Date)	Urban Farms should be address and policy implemented with objective standards. How are objective standards determined? Based on what research or document?	Comment noted. Action item for urban farming standards added. See revision 145.
358	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-12	Letter to City (No Date)	For related policies and standards; group and page number	Staff has reviewed this and recommends against it as page numbers may change over time. No changes proposed.
359	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-13	Letter to City (No Date)	No overlay zoning district in East Elk Grove. What is this "as applicable"? Define, be specific.	This should read "...for East Elk Grove, East Franklin, and Calvine-99 SPA" This is the transition of these areas from a land use management perspective from their older Specific Plans/Special Planning Areas to the Citywide Zoning Code. No revisions proposed.
360	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-13	Letter to City (No Date)	Administrative procedures for clustering permits for new development smaller than 40 acres. Streamlining is important however so is transparency and public participation and hearings. Expanding the notification distance, descriptions and pictures on planning signs.	A new cluster development permit, subject to Planning Commission review and approval, has been drafted for consideration. No revisions proposed.
361	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-15	Letter to City (No Date)	Identify water as a requirement.	This already occurs. No changes are proposed.
362	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-17	Letter to City (No Date)	Who finances infrastructure? IFP-1-8	Development finances infrastructure. No changes proposed.
363	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-17	Letter to City (No Date)	1.7 community benefit agreements. How will the benefits be financed? Who are the parties involved with agreements?	This item will be removed. See revision 144.
364	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-19	Letter to City (No Date)	3,462 low income SEPA and Site 21 Site 21 15 acres; 315 units. The Sites and location need to be identified on a map and the page location of the map sited here.	Sites are shown in Figure 4-9 and will be updated with the 2021 Housing Element Update. No revisions proposed.
365	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-19	Letter to City (No Date)	REZONE 60 acres SEPA low income. This has 3 year rezone timeframe; from when to when? Dates?	This was completed with the adoption of SEPA in July 2014. This item continues to be listed for consistency with the State-certified Housing Element. No revisions proposed.
366	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-19	Letter to City (No Date)	Disagree with projects under 151 units by staff and not planning commission! A policy stating the projects under 151 units needs to be reviewed by planning commission with public hearing. The planning commission needs to be the approving authority.	This is a requirement of the City's Certified Housing Element. No revisions proposed.
367	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-19	Letter to City (No Date)	2.4 Lot Consolidations. Wrong! Need to consider location, and surrounding areas. Fast tracking is not necessary in the interest of all.	This is a requirement of the City's Certified Housing Element and is consistent with State policy. No revisions proposed.
368	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-21	Letter to City (No Date)	May consider other criteria? Examples need to be stated in document.	This is a requirement of the City's Certified Housing Element. No revisions proposed.
369	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-21	Letter to City (No Date)	2.7 Flexibility in development standards...civic center apartments really??? Flexibility in standards; Flexibility=Failure in standards. This does not bring consistency to the planning area.	This is a requirement of the City's Certified Housing Element. No revisions proposed.
370	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-23	Letter to City (No Date)	2.18 Employee housing; 12 units or 36 beds an agriculture use. Cite zoning section.	This was completed in 2014 following adoption of the current Housing Element. This item continues to be listed for consistency with the State-certified Housing Element. No revisions proposed.
371	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-25	Letter to City (No Date)	2.24 NO not without other policies in place for transparency and opportunity for public participation. The policy needs to be changed and the Planning Commission needs to serve as the approving authority.	This is a requirement of the City's Certified Housing Element. No revisions proposed.
372	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-25	Letter to City (No Date)	2.26 Public street frontage requirements-how busy is street; needs traffic, noise, air quality analysis. Not on main arterials.	This is a requirement of the City's Certified Housing Element. No revisions proposed.

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Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
373	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-27	Letter to City (No Date)	2.33 Mobile home parks? What zoning? How protecting?	The one park is located on East Stockton Boulevard. It is zoned RM-1, which is a mobile-home zoning district. This action only addresses the potential for replacement of the use. No change to the project is proposed. This is a requirement of the City's Certified Housing Element. No revisions are proposed.
374	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-31	Letter to City (No Date)	4.2 Employee incentive program - This program needs to be described within the document and cost to taxpayers disclosed.	No details of the project have been developed. This item only directs the City to create such a program. No changes proposed.
375	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-31	Letter to City (No Date)	4.5 Trails in farmland area? Describe the trail.	The action item refers to an update to the Bicycle, Pedestrian, Trails Master Plan and notes trails may be located near farmland. No changes are proposed.
376	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-31	Letter to City (No Date)	4.10 Typo P partner; needs color change	Comment noted and change made.
377	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-35	Letter to City (No Date)	Percent for Art program needs to include a brief description of the program	This is an action item and not a summary of the program. No change proposed.
378	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-37	Letter to City (No Date)	A policy to include urban infill farms until land developed as an opportunity to encourage property owners to collaborate with Land Based Learning Center to aide in blight prevention while developing skills of future farmers.	An action item to explore urban farming on undeveloped parcels has been added. However, staff has discussed this with the Center for Land Based Learning in the past and they may not be able to operate such a program in Elk Grove given their current priorities. The City will explore more.
379	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-39	Letter to City (No Date)	7.6 Type C needs to be black	Comment noted and change made.
380	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-45	Letter to City (No Date)	9.1 Should and include terrorism threats.	Comment noted; however, Local Hazard Mitigation Plans, as directed by FEMA, are scoped to address the potential for damage, loss, or other impacts created by the interaction of natural hazards with community assets. Hazards are natural processes. See https://www.fema.gov/media-library/assets/documents/31598 . In Sacramento County, they are a regional plan that requires collaboration with the County and other cities. No changes are proposed.
381	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-45	Letter to City (No Date)	9.5 Should include 100 year floodplain	This action is specific to the requirements of SB 5 and corresponding State legislation. The FEMA 100-year floodplain is managed by FEMA and updated pursuant to their schedule. No changes are proposed.
382	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-45	Letter to City (No Date)	9.6 What projects currently? Any or all projects proposed or under consideration	This is a general action item to work with these agencies. No changes are proposed.
383	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-45	Letter to City (No Date)	9.10 Should include rain/cold. Warming shelters	Comment noted and action item revised. See revision 147.
384	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-47	Letter to City (No Date)	9.14 Suburban Propane should be included.	Comment noted. No revision proposed.
385	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-49	Letter to City (No Date)	10.3 Community hospitals sites have been identified and approvals exist this needs to be referenced in this document and location shown on map.	Two hospitals have been approved but have not been constructed. Once a hospital has been built the General Plan background information may be updated. No changes proposed at this time.
386	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-53	Letter to City (No Date)	12.3 Sustainable city procurement; city already had opportunity to do so but instead continues to use Styrofoam. How will this be implemented? Policy?	The Styrofoam was a City-wide ban. This action item address procurement practices. No changes proposed.
387	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-55	Letter to City (No Date)	List page numbers of general plan implementation policies so reader can easily refer to the policies.	Staff has reviewed this and recommends against it as page numbers may change over time. No changes proposed.
388	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-57	Letter to City (No Date)	13.6 Policy should include new commercial retail buildings, solar construction coverings in retail center and multifamily units.	Comment noted. Revisions in the Climate Action Plan are being considered that would address this. No revisions proposed at this time.
389	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-59	Letter to City (No Date)	14.1 Development impact fees "periodically" as needed? Who determines need? How determined? This needs to be described.	Fee programs are updated approximately every five years based upon State law and case law. The schedule for each program is different based upon when it was last updated. No revisions proposed.
390	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-63	Letter to City (No Date)	16.2 City council reports; A policy needs to be in place limiting mayor and council members to just reporting on boards that they serve on as representatives to Elk Grove or items they would like to be agenzied.	This would be addressed in the City Council Norms and Procedures and not in the General Plan. No revisions proposed.
391	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-63	Letter to City (No Date)	City council forums quarterly and if mayor or council unable to attend council to be represented by staff member.	Comment noted. No changes proposed.
392	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-63	Letter to City (No Date)	16.3 A policy needs to be in place defining and identifying members of the "working group" with areas of city represented. A policy needs to be in place whereby the representative of a "working group" reports to city council during public meeting.	Comment noted. No changes proposed.
393	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-65	Letter to City (No Date)	17.1 "As necessary" how determined?	If a roadway facility is missing from the Roadway Fee Program but is shown in the SEPA planning documents it needs to be added to the Roadway Fee Program. No change proposed.
394	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-65	Letter to City (No Date)	17.5 Warrants are reached? How determined?	Warrants refer to engineering standards for when roadway improvements are necessary or required. In the case of the Rural Area, this is address through he Rural Roads Policy and Rural Roads Standards. No changes are proposed.
395	Lynn Wheat, Resident	General Plan Chapter 10, Page 10-65	Letter to City (No Date)	17.7 Overlay zoning district? Are triangle residents aware of this? Brief description of the overlay zoning district should be included on this page.	This only applies to the East Elk Grove Specific Plan area and not the Triangle. No changes proposed.

CHAPTER 11: GLOSSARY AND ACRONYMS

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
396	Sharon Lynes, Resident	General Plan Chapter 11	Letter to City (No Date)	Please add these following words to the glossary: Page 3-8 Activity district node Page 3-20 Mobil Home (RM-1) Page 4-8 Greenfield development Page 4-24 "Islanding" Page 7-18, 7-30, 10-18, Clustering Page 9-24 Dry Sewers	The activity, residential neighborhood, and open space/conservation districts are provided in Chapter 4. The RM-1 district is a zoning district provided in EGMC Title 23. These terms will not be added to the definitions. Definitions for the greenfield, islanding, clustering, and dry sewer terms will be added. See revision 148.
397	Sharon Lynes, Resident	General Plan Chapter 11	Oral comment, Planning Commission Workshop #3, October 4 2018	Would like the following terms to be included in the glossary (pg ref): Activity district/node (3-8) Greenfield (4-8) Islanding (4-24) Dry sewers (9-24) Clustering (7-18)	The activity, residential neighborhood, and open space/conservation districts are provided in Chapter 4. The RM-1 district is a zoning district provided in EGMC Title 23. These terms will not be added to the definitions. Definitions for the greenfield, islanding, clustering, and dry sewer terms will be added. See revision 148.
TRANSPORTATION ANALYSIS GUIDELINES					
398	Suzanne Pecci, Resident	Transportation Analysis Guidelines (TAG) Page 2	Email to City re: PC Workshop #4, October 18 2018	Line 2 of paragraph 1, The document is intended to be a resource applied in concert with professional judgment. Question Whose professional judgment?	The Guidelines are intended to be a resource to transportation planning and engineering professionals (City staff and consultants) conducting analysis for projects in the City. This will be clarified to read "...in concert with professional judgement of the City's Public Works Director."
399	Suzanne Pecci, Resident	TAG Page 2	Email to City re: PC Workshop #4, October 18 2018	General Plan Context. P2 states the General Plan and implementing programs serves as a blueprint for future and development. Question. Does Elk Grove's "blueprint for future growth and development" correspond or have a relationship to the SACOG Blueprint , including the Study Areas, where future growth is expected to occur?	The reference to "blueprint," relates to the City's vision for future growth and is not related to the SACOG Blueprint.
400	Suzanne Pecci, Resident	TAG Page 3	Email to City re: PC Workshop #4, October 18 2018	Trigger Requiring Analysis- states "unless explicitly waived by the City, a TA is required when any one or more of the following conditions is met:...Question- Will the public be informed when a TA is waived ?	This is not a change from current City practice. If discretionary approval of a proposed project is necessary and a TA is required. The level to transportation analysis necessary would be disclosed in the staff report.
401	Suzanne Pecci, Resident	TAG Page 11	Email to City re: PC Workshop #4, October 18 2018	Future Conditions-Cumulative No Project Conditions. Could you please explain this scenario and give an example.	As outlined in the guidelines, Cumulative No Project Conditions is represented by transportation conditions for all travel modes in the study area reflecting all approved projects plus pending projects or expected development of other areas of the City designated for growth. In most cases, the project site will likely be vacant under this scenario. In some cases, though, this scenario may need to account for any existing uses on the site that could continue and potential increases in development allowed by ministerial approvals only. Example - A 10-unit single family residential development is proposed on a vacant lot. The Cumulative No Project scenario would include all approved and reasonably foreseeable development projects in other areas of the City, but would not include the proposed project development. The Cumulative Plus Project scenario would add the 10-unit single family residential project to the vacant lot and analyze it with the other reasonably foreseeable development project in other areas of the City.
402	Suzanne Pecci, Resident	TAG	Email to City re: PC Workshop #4, October 18 2018	Figure 4 Figure shows 6 land Expressway from Franklin Blvd along Kammerer Rd. Changing to an 8 lane arterial midway between Big Horn and (Unnamed street) along Grant Line to Bradshaw Road then a 4 lane Arterial from Bradshaw through the Town of Sheldon to ?. Please discuss the thought behind the need for 8 lanes for that section of Grant Line Rd and how this traffic will transition into the rural area . What measures will be employed to make this a reasonable transition with relationship to Table 9? How will other modes of transportation achieve "safe "connectivity along Grant Line with the 8 lane arterial and how will they be realistically be accommodated with respect to the volume and speed of traffic along the 8 lane arterial? Will sound walls be employed to alleviate traffic noise?	The need for 8 lanes on Grant Line Road is a result of the need to accommodate travel demand generated by existing and planned population and employment growth in the City (i.e., the proposed General Plan Update), as well as growth in travel demand generated by population and employment growth outside of the City of Elk Grove. The accommodation of other travel modes need to consider the function of a roadway. In the case of the 8-lane section of Grant Line Road, one of the functions of the roadway is to accommodate a high volume of traffic. Consequently, the character of the roadway, including facilities for people who walk and bike, will be different than a facility that would serve lower traffic volumes traveling at lower speeds. The subject section of Grant Line Road is part of the Connector JPA. The commenter is referred to the proposed connector project, which has identified specific bicycle and pedestrian treatments, which would be incorporated into this facility.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
403	Suzanne Pecci, Resident	TAG Page 21	Email to City re: PC Workshop #4, October 18 2018	Analysis Methodology Provide current estimates on "heavy truck percentages" along Grant Line and safety measures that will be employed to curtail speeding, tailgating cars observing speed limits, etc.	The Guidelines are not intended to document existing conditions on individual roadways. The Guidelines provide guidance on methodology for conducting transportation analysis in the City of Elk Grove, which includes details on existing conditions data collection. The Guidelines ensure consistent methodology for all nature of analysis that may be required by public and private interests that require transportation analysis.
404	Suzanne Pecci, Resident	TAG Page 28	Email to City re: PC Workshop #4, October 18 2018	VMT Reduction Strategies. How will these strategies be specifically employed in the rural area along Grant Line to protect health of residents, especially as the 8 lane arterial is planned to accommodate future entertainment venues, i.e. casino, soccer complex and wine/agra tourism along the route?	VMT reductions strategies will depend on the location and character of proposed development. Consequently a strategy for a residential development in the Laguna Ridge Specific Plan, located near services, will be different than a residential development in a rural area, so it is difficult to provide specific examples or measures that may be employed. However, the evaluation of VMT for all projects needs to consider full context of the land use and transportation system in the City to measure VMT and the effectiveness of VMT reduction strategies.
405	Suzanne Pecci, Resident	TAG Page 29	Email to City re: PC Workshop #4, October 18 2018	Long Term VMT analysis. Comment, I don't understand why staff wouldn't have already reviewed the current Sacramento Metropolitan Transportation Plan / Sustainable Communities Strategy and know whether a project is specifically referenced or listed in the MTP/SCS and therefore be able to provide information in the General Plan where long-term VMT analysis . Please discuss.	The comment refers to VMT analysis for transportation projects. The General Plan transportation analysis did include transportation projects that were considered to have reasonably foreseeable funding outside of the City, consistent with SACOG's MTP/SCS. This section in the Guidelines outlines the methodology necessary to conduct transportation analysis (i.e., VMT Analysis) for transportation projects that are not included in the MTP/SCS.
406	Suzanne Pecci, Resident	TAG Page 29	Email to City re: PC Workshop #4, October 18 2018	Reduction Strategies(Mitigation) If projects exceed short-term or long-term VMT limits, why wouldn't an additional mitigation measure be the reduction of development of houses? How would an increase of bike lanes or sidewalks be a mitigation measure unless they are mandatory for travelers of the impacted route. Transit-related improvements make sense. Please discuss.	As outlined above, VMT performance is a function on the location and character of development. Consequently, specific reduction strategies will depend on those factors. The evaluation of VMT for all projects needs to consider full context of the land use and transportation system in the City to measure VMT and the effectiveness of VMT reduction strategies. As proposed, reducing the number of houses would reduce total VMT, but would not likely reduce the VMT performance (i.e., VMT/Service Population). Bike lanes and sidewalks reduce VMT by improving facilities for people that walk and bike, which provide alternatives to using automobiles for some trips. However, the effectiveness of these facilities in reducing VMT will depend on the location of the project in relation to other uses and the purpose of the trip that needs to be made.
407	Suzanne Pecci, Resident	TAG Page 36	Email to City re: PC Workshop #4, October 18 2018	Paragraph 2 reads "The City will review the trip generation analysis and determine if additional analysis is required." Please clarify who or what department "the City" refers to. Throughout this document Public Works has been referenced as the decision maker, so what has changed? And who else in "the City" would have that expertise or is the determination political in nature?	Page 2 of the Guidelines clarifies the responsibility for decisions to be made by the City as follows. Ultimate determination of the criteria and analysis required for a project shall be the responsibility of the Public Works Director (as used in this document, "Public Works Director" means the Public Works Director or his or her designee).
408	Lynn Wheat, Resident	Transportation Analysis Guidelines	Letter to City (No Date)	Traveling now is not easy!	Comment noted.
409	Lynn Wheat, Resident	TAG Page 3	Letter to City (No Date)	#2 refers to a 2 and 3 above that are not identified; no 2 or 3 above... as determined by Public Works Director. Section 2, Although a master TA may be prepared for larger development, the master TA should still be analyzed for adequacy if it is being relied upon for future phases if more than three years have passed since its previous evaluation.	The text in the Guidelines has been modified as follows: 2. A project with unique land uses or operating characteristics that is not easily characterized by conditions 2 and 3 above, as determined by the Public Works Director. Regarding a master TA, the individual phase or project that is part of a master TA will need to demonstrate consistency with the larger development. The analysis of phases or projects of the larger development would be required to conduct a site access and on-site circulation analysis, which would be based on current conditions at the time of the application or notice of preparation of an environmental document.
410	Lynn Wheat, Resident	TAG Page 4	Letter to City (No Date)	#2 Adopt statement of overriding considerations. Mitigate to the extent feasible. "Economic Benefit". VMT Analysis. In discussing significant and unavoidable transportation impacts and overriding considerations, the City should establish a supplemental transportation impact fee for those projects creating an unavoidable impact. The fee should be dedicated to the construction/operation of alternative transportation methods such as trails, transit, bike lanes, etc. The fee should be based on the level of VMT that are deemed to exceed the General Plan threshold of significance according to the land use type.	The City is updating the transportation impact fee program. However, the exact nature of the fee program and how the nexus between infrastructure projects funded by the program and the fees collected from new development has not been determined at this time. However, the topics outlined in the comment will be considered during the development of the fee program update.
411	Lynn Wheat, Resident	TAG Page 10	Letter to City (No Date)	Small projects and Large Projects. What determines small or large? How defined.	The determination for the scope of the analysis will ultimately depend on many factors and not just the physical size of the project. An example of a small project would be one single family dwelling in a rural area of the City. A large project would be a shopping center.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
412	Lynn Wheat, Resident	TAG Page 11	Letter to City (No Date)	General Plan Policy MOB-1.4 is referenced. What page in General Plan? I could not find it.	Policy MOB-1-3 is the correct reference. The reference has been corrected.
413	Lynn Wheat, Resident	TAG Page 12	Letter to City (No Date)	Weekday evening peak hours should be extended to 3-6pm instead of 4-6pm because of the school days and congestion created by school release times.	The Guidelines indicate that study time periods should be made separately for each proposed project, based on peaking characteristics of the project and the adjacent street system. In addition, all traffic volume data should be collected when local schools are in session.
414	Lynn Wheat, Resident	TAG Page 16	Letter to City (No Date)	Daily Traffic count; Bicycle and pedestrian counts should be included during the peak times as traffic created by school release times includes pedestrians and bicycles that could have an effect of signal timing and flow of traffic. Plus, need to consider with the push for more bikes and pedestrian as modes of transportation. Travel time and speed need to be included as effect on signal timing and congestion.	The Guidelines indicate that study time periods should be made separately for each proposed project, based on peaking characteristics of the project and the adjacent street system and that all traffic volume data should be collected when local schools are in session. Bicycle and pedestrian counts, and travel speed/time are specified in the Guidelines and necessary for the roadway and intersection efficiency analyses.
415	Lynn Wheat, Resident	TAG Page 19	Letter to City (No Date)	Bicycle Street score LTS. Since 2012 cellphone use in cars has increased. Is this included in evaluation street score and safety?	Cell phone data is not proposed to be used.
416	Lynn Wheat, Resident	TAG Page 23	Letter to City (No Date)	"Targets represent aspirational goals but shall not be mandated performance standards". What are the mandated performance standards? Table 8; are these the mandated performance targets? Reference?	There are no mandated performance standards except those related to VMT.
417	Lynn Wheat, Resident	TAG Page 32	Letter to City (No Date)	Sacramento MTP/SCS transportation included in the discussion of cumulative impacts?	Typically the current MTP/SCS is the basis for cumulative conditions outside the City.
418	George Murphey, Planning Commissioner	Transportation Analysis Guidelines	Email to City, October 15 2018	How was the TAG developed? By PW using state guidelines? How much time will completing a TAG add to project review? What type or degree of Findings will be required when completing a TAG?	The Guidelines were developed by the General Plan Update team, which included City staff and the City's transportation consultant (Fehr & Peers). The Guidelines follow state of practice methods and incorporate the guidelines developed by the Governor's Office of Planning and Research (OPR) titled <i>Technical Advisory on Evaluating Transportation Impact in CEQA (April 2018)</i> . VMT forecasts are already generated as part of transportation analysis studies for CEQA documents today to support other resource areas like air quality and greenhouse gas analysis. Although the VMT for transportation analysis is a calculated differently, the same tool (i.e., the City's travel demand forecasting model) that is used to generate forecasts for roadways and intersections will be used to generate VMT forecasts for transportation analysis. It is difficult to quantify the amount of time that will be required for conducting a VMT analysis for transportation, since it will depend on the project being analyzed. A land use or transportation project that is pre-screened, will require little if any analysis. However, a project that is not pre-screened would require more analysis. The findings that will be required for transportation-related analysis using VMT will be the same as the findings required under CEQA for analysis using LOS.
419	George Murphey, Planning Commissioner	TAG Page 3	Email to City, October 15 2018	Triggers Requiring Analysis references Table 13, pg 45. Is this the correct page and/or table referenced? if so, referenced table isn't labeled. Add label to table to identify.	The page reference should be Table 13 on Page 31. This reference has been corrected.
420	George Murphey, Planning Commissioner	TAG Page 4	Email to City, October 15 2018	Will VMT required analysis potentially require greater need to adopt "statements of overriding considerations"?	Depends upon the project and its characteristics and location.
421	George Murphey, Planning Commissioner	TAG Page 15	Email to City, October 15 2018	Bader R. north of Sheldon not color coded	Bader Road north of Sheldon is classified as a local street, so it is not colored. Between Sheldon and Bond it is classified as a collector. Regardless it is a two-lane facility. No changes proposed.
422	Suzanne Pecci, Resident	TAG Page 23	Oral comment, Planning Commission Workshop #4, October 18 2018	Line 2: "applied in concert with professional judgement". Needs to have public input integrated into the process (e.g., Rural Roads Policy was developed based on feedback from the community).	The Guidelines are intended to be a resource to transportation planning and engineering professionals (City staff and consultants) conducting analysis for projects in the City and are an update to the City's current traffic analysis guidelines. This will be clarified to read "...in concert with professional judgement of the City's Public Works Director."
423	Suzanne Pecci, Resident	TAG, Page 3	Oral comment, Planning Commission Workshop #4, October 18 2018	"...unless explicitly waived by the City..". Define the City (City Manager, City Engineer, City Council?). Is the public going to be notified of a waiver?	Page 2 of the Guidelines clarifies the responsibility for decisions to be made by the City as follows. Ultimate determination of the criteria and analysis required for a project shall be the responsibility of the Public Works Director (as used in this document, "Public Works Director" means the Public Works Director or his or her designee). If the Public Works Director waives the requirement this will be identified, as appropriate, in the project staff report.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
424	Suzanne Pecci, Resident	TAG	Oral comment, Planning Commission Workshop #4, October 18 2018	Figure 4 (I think on slide 4 of PPT): 6 to 8 lanes on Kammerer. Why are 8 lanes needed for that distance? How are 8 lanes going to transition to 4 lanes further east?	The need for 8 lanes on Grant Line Road is a result of the need to accommodate travel demand generated by existing and planned population and employment growth in the City (i.e., the proposed General Plan Update), as well as growth in travel demand generated by population and employment growth outside of the City of Elk Grove. Like a funnel, north/south arterials like Waterman Road and Bradshaw Road deliver traffic to Grant Line Road for travelers with an origin/destination north, south, and west of the Grant Line Road corridor. The roadway network and planned growth necessitates the need for the 8-lane section. The transition will likely occur through a combination of lane drops (e.g., a through lane that ends at a right-turn movement) and lane transitions/merges (e.g., a through lane that merges after an intersection). Different methods will be investigated during the design of the facility.
425	Suzanne Pecci, Resident	TAG	Oral comment, Planning Commission Workshop #4, October 18 2018	Grant Line: What are the heavy truck percent and the safety measures to address heavy truck traffic?	The Guidelines are not intended to document existing conditions on individual roadways. The Guidelines provide guidance on methodology for conducting transportation analysis in the City of Elk Grove, which includes details on existing conditions data collection. The Guidelines ensure consistent methodology for all nature of analysis that may be required by public and private interests that require transportation analysis. The Guidelines will ensure that the appropriate data is collected for the design of Grant Line Road when the ultimate improvements are needed.
426	Suzanne Pecci, Resident	TAG Page 36	Oral comment, Planning Commission Workshop #4, October 18 2018	Paragraph 2: Clarify who at the would be making a determination. Public Works? City Council?	Page 2 of the Guidelines clarifies the responsibility for decisions to be made by the City as follows. Ultimate determination of the criteria and analysis required for a project shall be the responsibility of the Public Works Director (as used in this document, "Public Works Director" means the Public Works Director or his or her designee).
427	Oscar Balaguer, 350 Sacramento	TAG	Oral comment, Planning Commission Workshop #4, October 18 2018	Good implementation, thorough document but had concerns with the policies.	Comment noted.
428	Oscar Balaguer, 350 Sacramento	TAG	Email to City re: PC Workshop #4, October 18 2018	The TAG speaks to the City's main greenhouse gas source, on-road vehicles. It's a good, comprehensive, detailed planning document. But we have concerns. [references Chapter 6 - Mobility - see comments #122 and 123].	Comment noted.
CLIMATE ACTION PLAN					
A-4	Lynn Wheat, Public Commenter	Climate Action Plan (CAP)	In Person, Planning Commission Workshop (9/20/18)	Target indicators: how is this going to be tracked?	Target indicators in the CAP will be tracked through CAP implementation monitoring process. Implementation Measure 3 of CAP Chapter 5 includes action items that ensure that CAP implementation will be monitored on a quarterly basis.
B-6	Sacramento Metropolitan Air Quality Management District (SMAQMD)	CAP	Comment Letter on CAP	Recommend the use of the term complementary rather than complimentary on page 1-2 of the CAP.	Change language accordingly in the CAP document. See revisions.
B-7	SMAQMD	CAP	Comment Letter on CAP	Consider mentioning that wildfire smoke contributes to decreased economic activity, as people tend to avoid venturing outside for shopping and recreational activities	This is background information that does not modify the measures and programs provided in the document. Further, the City has no wildland areas susceptible to wild fires. No revisions are proposed.
B-8	SMAQMD	CAP	Comment Letter on CAP	It is not clear which report or study "the new study" references on page 2-7	Update language to clarify what the "new study" is referring to. See revisions.
B-9	SMAQMD	CAP	Comment Letter on CAP	The discussion of federal measures on page 2-10 appears to be incomplete. Commenter suggest 1) provide more context and explanation of how lawsuits over the Federal EPA's new rulemaking on fuel economy standards and the Clean Power Plan would play out in the near term; or, 2) omit altogether.	Deleting discussion in CAP based on lack of relevance to the City and the policies included in the CAP. Otherwise, update language and provide more context regarding this regulatory procedure. See revisions.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
B-10	SMAQMD	CAP	Comment Letter on CAP	Commenter states that economic conditions have improved since 2013 (baseline) and, therefore, assumptions regarding transportation (VMT estimate) may be underestimating current VMT trends. Commenter suggests more attention be given to the this inventory sector and its assumptions, as the City's largest emissions sector.	Project VMT estimates for baseline were sourced using 2015 baseline and extrapolated to 2013. Transportation modeling does not factor in economic trends into the modeling and, therefore, changing economic conditions would not affect VMT estimates. Transportation modeling is based on land use changes which may have changed since 2013 however these increase would have been factored into the City's growth projection for 2020 and beyond.
B-11	SMAQMD	CAP	Comment Letter on CAP	If the City finds its annual monitoring that additional CAP measures are needed to meet the targets the City should phase in zero net energy standards in new commercial development in the 2024 CAP update, or earlier, rather than wait until 2030, as currently stated in BE-5 Building Stock: Phase in Zero Net Energy Standards in New Construction	The will be addressed through building electrification measure (BE-6 updates) which assumes all electric buildings may be phased by 2030 for residential and commercial buildings.
B-12	SMAQMD	CAP	Comment Letter on CAP	CAP measures do not specify or quantify measures that would bring in revenue to the city but only highlight costs the City would incur from the measure.	Comment noted.
B-13	SMAQMD	CAP	Comment Letter on CAP	For measure BE-2 Upgrade Residential Appliances in Existing Development, we recommend including a discussion of SMUD's new incentives to upgrade homes to use all-electric appliances and systems, including water heaters, dryers, cooking range, and HVAC systems.	This will be revised/added as part of the revised BE-6 measure, which focuses specifically on electrification of new and existing buildings and includes an action item to promote SMUD's electrification program.
B-14	SMAQMD	CAP	Comment Letter on CAP	Incorporate energy conservation education, resources, available rebates, etc., into required permitting processes, such as the process of obtaining a business permit to promote measure BE-3 Nonresidential Appliances in Existing Development.	This will be included as an action item under measure BE-3, but it would not change assumptions about participation rates for this measure. See revisions.
B-15	SMAQMD	CAP	Comment Letter on CAP	Consider including education about SMUD's incentive for replacing high-GWP refrigerants with low-GWP alternatives.	High-GWP GHG's were not included in baseline inventory, therefore this would not result in any quantifiable GHG reductions.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
B-16	SMAQMD	CAP	Comment Letter on CAP	Provide additional incentives or streamlining to encourage developers to build all-electric homes, on top of SMUD's existing incentive for new all-electric homes for builders as part of measure BE-4 Encourage or Require Green Building Practices in New Construction. Work in partnership with SMUD to host demonstration and education events for developers and the public on the efficiency of heat pumps, induction ranges, and smart homes.	This will be partially addressed through the all electric homes revisions under BE-6.
B-17	SMAQMD	CAP	Comment Letter on CAP	Provide more details for BE-6 Encourage or Require Green Building Practices in Existing Buildings on how the City plans to provide information, education, and encouragement on energy efficiency improvements for renovations. Define thresholds above which renovations must meet CALGreen Tier 1 standards.	See revisions.
B-18	SMAQMD	CAP	Comment Letter on CAP	Include high-efficiency heat pump water heaters for measure BE-7 Solar Photovoltaics and Solar Water Heating in Residential and Commercial Development.	The measure has now been changed to just focus just on solar PV systems. BE-6 includes a discussion of SMUDs all electric homes programs which includes incentives for high-efficiency heat pump water heaters. See revisions.
B-19	SMAQMD	CAP	Comment Letter on CAP	Prioritize the alternatives listed in measure RC-2 Organic Waste Reduction by the alternatives that obtain the most GHG reductions.	It is difficult to quantify which of these actions would have the largest effect. All are considered necessary to meet the target GHG reductions in the measure. Without more details about the City's current operations, this would be difficult. No change proposed.
B-20	SMAQMD	CAP	Comment Letter on CAP	Amend the zoning code (as part of Implementation Measure 1.1) to prohibit land use types within ¼ mile of a major transit station that are not transit supportive to support TACM-2 Transit-Oriented Development. Make changes accordingly to GPU to provide consistency between this measure and Policies LU-3-2, LU-3-4, MOB-5-1, NR-4-6 in GPU.	Some sites along the Big Horn Blvd corridor are proposed for rezoning to Village Center Mixed Use, which would prohibit drive through uses, fueling stations, and similar auto-oriented businesses. No additional changes are proposed.
B-21	SMAQMD	CAP	Comment Letter on CAP	For TACM-5 Affordable Housing, please clarify if the 2030 target of 4,000 homes below market value is in addition to the 2020 target of 3,000 affordable housing units.	Update CAP document language to clarify that the 4,000 units for 2030 are on top of the units for 2020 target.
B-22	SMAQMD	CAP	Comment Letter on CAP	For TACM-6 Limit Vehicle Miles Traveled, the City should review the effectiveness of the VMT thresholds annually to ensure continued progress toward VMT reductions and include an update in its scheduled CAP update in 2024.	The City could include this recommendation as an action item for implementation of MOB-1-1, which TACM-6 is based upon. Existing CAP monitoring and reporting measures would include annual review and administration of TACM-6 Limit Vehicle Miles Traveled, which could be coordinated with GPU monitoring and reporting
B-23	SMAQMD	CAP	Comment Letter on CAP	Under TACM-9 Install EV Charging Stations, consider innovative strategies to support multi-modal EV charging (including both light and heavy duty vehicles), as well as chargers that can support public and private fleet use, general public use, and use by transportation network companies and car-share operators.	The City could expand action items under TACM-9 Install EV Charging Stations to include discussion of emphasis on EV charging for TNC's and car sharing programs particularly for use at municipal EV charging stations and affordable housing developments.
B-24	SMAQMD	CAP	Comment Letter on CAP	the commenter is excited about measure TACM-8 Tier 4 Final Construction Equipment due to the co-benefits of criteria and toxic air contaminant reductions and recommends the City to include TACM-8 in General Plan Policy NR-4-8 along with all the other construction related emissions reducing policies.	Policy NR-4-8 has been updated as requested. See revisions.
B-25	SMAQMD	CAP	Comment Letter on CAP	The commenter appreciate the level of detail in Chapter 5 regarding CAP implementation measures and actions items, including the formation of an intra-agency Climate Action Team comprised of CAP Liaisons from City departments, the CAP Development Review Checklist, and quarterly monitoring of the CAP progress. 21. We recommend including a specific timeframe for Impel	This would not result in a change to the CAP. The comment is noted.
B-26	SMAQMD	CAP	Comment Letter on CAP	Include a specific timeframe for Implementation Measure 2, Actions 2.1 and 2.2 for integrating the CAP Development Review Checklist	Comment noted and incorporated. See revisions.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
B-27	SMAQMD	CAP	Comment Letter on CAP	It is important for Implementation Measure 3 that the City designate key staff within the Climate Action Team to be responsible for annual monitoring and reporting (action 3.5) before conducting actions 3.3 and 3.4, so the staff could participate in actions 3.3 and 3.4. It is not clear whether this numerical sequencing of events is also chronological.	The order of actions under this measures was not necessarily intended to be purely chronological for sequencing purposes; however, it could make some sense to reorder action items to assist with sequencing to help City staff with implementation. See revisions.
B-28	SMAQMD	CAP	Comment Letter on CAP	Projects that fall within the CEQA exempt category in this flowchart may still be subject to an existing Air Quality Mitigation Plan and/or Greenhouse Gas Reduction Plan adopted prior to the City developing its CAP. The City must ensure these projects implement adopted reduction measures.	CEQA streamlining procedures under CEQA guidelines 15183.5 only apply to projects that are not exempt from CEQA and must undergo environmental review, and which are eligible for tiering and streamlining. Some of the GHG reduction measures in the CAP could still apply to some discretionary projects that are CEQA exempt but still subject to an AQMP or other related requirements, however the streamlining and tiering procedures would not apply in such cases.
D-5	Bill Meyers, former member of the Citizens Commission	CAP	In Person, Planning Commission Workshop (9/20/18)	Impacts of Climate Change comments - Central Valley is going to suffer a lot from heat. - Reference to ARKStorm scenario. Need to take action. - Concerned about lower performance in schools	These comments do not directly address the CAP, GPU, or DEIR but discusses the impacts of climate change in general. See comment D-6 and response below.
D-6	Bill Meyers, former member of the Citizens Commission	GPU/CAP	In Person, Planning Commission Workshop (9/20/18)	Is the GPU/CAP responding to the most current scientific evidence regarding climate change? Is there a gap between state law and targets and climate science?	The CAP includes the most recent legislation regarding climate change which uses sound scientific findings to set policy and state GHG reduction targets. The GPU/CAP is intended to remain consistent with state policy and GHG reduction targets. No revisions are proposed.
D-7	Bill Meyers, former member of the Citizens Commission	GPU/CAP	In Person, Planning Commission Workshop (9/20/18)	Can we get Citizens Commission together to review/provide input? Seems like we're going through the motions.	Comment noted. The Planning Commission discussed including a committee in the draft CAP and is not recommending this concept. No revisions proposed.
D-8	Nancy Castanetti – Elk Grove resident, homeowner, educator	GPU/CAP	In Person, Planning Commission Workshop (9/20/18)	Concern about the CAP, seems to be aspirational only.	The CAP provides a set of measures that combine regulatory requirements with incentive-based actions, and based on substantial evidence, these actions would result in GHG reductions to ensure the City would reach the statewide reduction targets. Chapter 5 of the CAP includes implementation measures that will need to be executed to ensure the CAP is fully implemented. No revision proposed.
D-9	Commissioner Wieser	CAP	In Person, Planning Commission Workshop (9/20/18)	Questions whether the CAP has legal adequacy for CEQA mitigation of general plan impacts and for CEQA streamlining of future project	See response to Comment D-10. Also, the CAP includes all the necessary components of a qualified GHG Reduction Strategy under CEQA and, therefore, may serve to streamline CEQA analysis in accordance with CEQA section 15183.5. The development of a CAP checklist for future development projects in the City will ensure that development of land uses under the GPU are consistent with the CAP reduction targets. The comment does not provide specific detail about why the CAP does not have legal adequacy.

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D-10	Commissioner Wieser	CAP	In Person, Planning Commission Workshop (9/20/18)	Data in the document is old/outdated. The CAP uses old/outdate citations.	See response above to Comment D-6. No revisions proposed.
D-11	Commissioner Wieser	CAP	In Person, Planning Commission Workshop (9/20/18)	Is there a penalty if you don't meet 2045 and 2050 goals?	No. While the State's longer-term goals for achieving deeper reductions are important considerations in climate action planning, the State has not adopted a new scoping plan that identifies achieves these goals. Further, local governments cannot achieve these aggressive longer-term goals without State and Federal actions in sectors in which local agencies have no jurisdictional authority, such as vehicle emissions standards, large industrial emitters under cap-and-trader regulations, and other sectors. CAP implementation and monitoring will identify whether the City is on target to achieve GHG reduction targets for 2030, along with new actions the State may take in future to adopt legislative targets for years beyond 2030. If targets for future years beyond 2030 are not being met, future CAP updates will provide more aggressive GHG reduction measure to achieve needed reductions.
D-12	Commissioner Wieser	CAP	In Person, Planning Commission Workshop (9/20/18)	Need scientific working group	Comment noted.
D-13	Commissioner Wieser	CAP	In Person, Planning Commission Workshop (9/20/18)	SB 743 VMT language is not in the CAP. Need requirements for solar thermal, renewables, have to do it smart.	Measure TACM-6. Limit Vehicle Miles Traveled does mention SB 743 and is intentionally designed to help inform the transition to using VMT in CEQA analysis. TACM-6 is consistent with General Plan Policy MOB-1-1, which is consistent with OPR guidance on VMT quantification and mitigation pursuant to SB 743. CAP measure BE-7 is devoted to solar systems in both existing and new development in the City and includes a series of action items to ensure effective implementation. See additional or revised measures the City is considering in response to several comments from public and Commissioners are documented separately from this matrix.
D-14	Commissioner Murphey	CAP	In Person, Planning Commission Workshop (9/20/18)	Thinks CAP should have more clarity. Problem with State targets/goals changing (moving targets) is frustrating.	The commenter did not specify what portions of the CAP should have more clarity. The CAP provides an explanation of the current state policy from governing GHG reduction targets, as well as detailed descriptions and assumptions regarding locally-based GHG reduction measures. Future updates to the CAP will incorporate any new policy which is passed into law.
D-15	Commissioner Murphey	CAP	In Person, Planning Commission Workshop	Trying to make the city energy efficient is a priority.	CAP measure BE1 through BE-6 all focus on increasing the energy efficiency of new and existing buildings in the City.
D-16	Commissioner Murphey	CAP	In Person, Planning Commission Workshop (9/20/18)	Concerned that mandates from the State would be crushing.	State mandates are stringent but if executed correctly can provide significant economic benefit to the City through cost savings and health benefits.
D-17	Commissioner Murphey	CAP	In Person, Planning Commission Workshop (9/20/18)	CAP must also have some teeth.	CAP is integrated into the GPU process to ensure the CAP will be specific and enforceable when implementing land use changes or other discretionary approval for projects under the GPU. The CEQA streamlining benefits of the GPU and integrated CAP process ensure that new development in the City will remain consistent with the GHG reduction goals in the CAP.
D-18	Commissioner Murphey	CAP	In Person, Planning Commission Workshop (9/20/18)	Can other options be presented?	Comment is not clear on what other options should be presented. Updated CAP measure provide significant buffer room for the City to decide what measures to implement first and still meet the 2030 GHG reduction target. Additional or revised measures the City is considering in response to several comments from public and Commissioners are documented separately from this matrix.

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D-19	Commissioner Spease	CAP	In Person, Planning Commission Workshop (9/20/18)	Concerned about moving targets - Get public comments, incorporate. Be cautious about kicking can down the road.	Comment is not clear on what is meant by moving target. CAP GHG reduction measures provide sufficient GHG reduction potential to reach 2030 targets even if they are moving. Additional or revised measures the City is considering in response to several comments from public and Commissioners are documented separately from this matrix.
D-20	Chairman Maita	CAP	In Person, Planning Commission Workshop (9/20/18)	Burden for discussion – why exceed State standards? How does it affect? Concerned about putting the city at a competitive disadvantage. Community concerns – looking too far, alienating.	The GHG reduction measures identified in the updated CAP collectively meet and exceed State target for 2030, but having a cushion will help City stay on track to meeting the target, in the event some measures cannot be implemented successfully or do not achieve the level of GHG reductions. Having additional reductions available also furthers progress in meeting longer-term 2050 goal. CAP and specific measures provide a number of economic and health benefits which will help the City and improve livability. CEQA streamlining approach ensures that the CAP is being implemented while ensuring that the City is not at a competitive disadvantage.
D-21	Commissioner Wieser	CAP	In Person, Planning Commission Workshop (9/20/18)	Need data, digest science we know is available. - 4th Assessment released a few weeks ago.	See response above to Comment D-6. No revisions proposed.
D-22	Commissioner Wieser	CAP	In Person, Planning Commission Workshop (9/20/18)	Concerned about too many measures being voluntary.	Some measures include both mandatory and voluntary components because methods of implementation vary. CAP Checklist will ensure that all relevant measures related to new development will be enforceable and result in GHG reductions (detailed explanation in Chapter 5). No revisions proposed.
D-23	Commissioner Wieser	CAP	In Person, Planning Commission Workshop (9/20/18)	Hundreds of millions in funding is available, such as Cap and Trade revenue funded programs. Use funds to be more aggressive.	Implementation Measure 4: Funding Sources includes discussion of pursuing grant funding to implement measures as well as integrating GHG reduction measure and programs into the City's budget.
D-24	Oscar Balaguer	CAP	Planning Commission comments	Climate change is the defining issue of our time and poses a direct, existential threat.	Comment noted.
D-25	Oscar Balaguer	CAP	Planning Commission comments	We caution against undue emphasis on CEQA streamlining without adopting GHG-reduction measures that the enabling mandate is meant to encourage.	The CEQA streamlining process outlined in the CAP includes specific and enforceable measures that would apply to new development projects, along with review procedures that would make certain measures enforceable during the CEQA review process.
D-26	Oscar Balaguer	CAP	Planning Commission comments	Commenter states that the CAP relies heavily on already existing non-City programs and mandates.	The CAP includes both new programs and incorporates existing programs to best utilize existing resources to achieve cost efficient GHG reductions. The City feels it is appropriate to include existing programs implemented by others (e.g., SMUD) that substantial evidence demonstrates are funded and are already achieving or will achieve reductions because of other binding commitments that reduce emissions in Elk Grove's jurisdiction. Promoting innovative new programs that are funded, rather than reinvent the wheel and duplicating efforts, may be appropriate in these cases.
D-27	Oscar Balaguer	CAP	Planning Commission comments	Concerned that the CAP's measures tend to be policy level, aspirational statements. Commenter states that the measures must comply with CEQA standards for specificity and enforceability.	The CAP includes specific and enforceable measures that would allow the City to meet its GHG reduction targets. Appendix B of the CAP provides specific details on the methodology for quantifying the GHG reductions from the measures. Additionally, the implementation measures in Chapter 5 of the CAP outline specific procedures by which the City will administer the CEQA review process for subsequent projects, and monitor and update the CAP.
D-28	Oscar Balaguer	CAP	Planning Commission comments	Commenter has questions regarding some of the methodological assumptions used to calculate GhG reductions and seek clarification.	The commenter does not provide detail on which measures they seek clarification on. Appendix B of the CAP provides specific details on the methodology for quantifying the GHG reductions from the measures.
E-1	350 Sacramento	CAP	Letter	1. The City's Assessment of Climate Change ... We request that the CAP be updated to reflect the findings of these recent studies.	The Draft CAP was released before either of these reports were made public, explaining their exclusion from the Draft CAP document. Ultimately, this is background information which doesn't directly change the draft programs. No changes proposed.

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E-2	350 Sacramento	CAP	Letter	2. Visioning a Bright Future... We urge the City to consider joining the growing list of forward-looking California cities and businesses committed to vigorous climate goals, policies, and programs beyond current mandates.	The Draft CAP demonstrates that with implementation of measures included in the document, the City will reach and exceed the 2030 GHG reduction target of 4.1 MTCO ₂ e per capita by reducing emissions to 3.8 MTCO ₂ e per capita by 2030 and will demonstrate considerable progress towards reaching the 2050 target of 1.4 MTCO ₂ e per capita. The measures included in the CAP serve to both reduce GHG emissions as well improve the quality of life in the City, many of which include long-term financial savings for residents. The CAP will also be updated no later than 2024 to incorporate new technologies and GHG reduction strategies into the CAP, ensuring the City's efforts to reduce GHG emissions remain up to date and the City is pursuing the most effective GHG reduction strategies.
E-3	350 Sacramento	CAP	Letter	3. Moral and Ethical Considerations. Climate change will exacerbate existing environmental justice issues and create new ones. Those most vulnerable are the elderly, children, participants in athletic events, outdoor workers, medically compromised or socially isolated people, and disadvantaged community members. ⁷ In general, those with the smallest carbon footprints will have the fewest resources to adapt. Additionally, because unchecked climate change will be increasingly dangerous, those most affected will be today's young and those not yet born. Postponing avoidance measures will enormously increase the future difficulties of everyone on the planet and especially the above-mentioned classes. Thus, balancing short-term inconveniences against reducing long-term harms, the worst of which will affect people we may never know, poses residents and decision-makers momentous moral and ethical choices. We urge policy-makers to reflect on these considerations.	The Draft CAP does not explicitly take into consideration the moral and ethical considerations of climate change. The CAP does include measures which both reduce GHG emissions in line with state targets and guides decisions about the future of the built environment in the City. These decisions will positively impact current and future residents through quality of life improvements.
E-4	350 Sacramento	CAP	Letter	II. GENERAL COMMENTS 1. Role of the CAP The CAP displays at a program level the City's CEQA-mandated mitigation of GHG emissions from the development envisioned in the City's General Plan update. It would obviate project specific GHG analysis and mitigation. As such, it is subject to CEQA regulatory requirements and applicable case law. This is accurately reflected in one section of the CAP. ⁸ But the CAP and General Plan also repeatedly refer to the CAP as a "policy" or "strategic planning" document. ⁹ The CAP does in part reflect City policy, but absent regulatory context this description may be misleading, and the disparate characterizations confusing. The City may wish to reconcile these apparently divergent descriptions.	Revisions have been made in Chapter 10 of the General Plan to describe the CAP as a qualified GHG reduction plan per CEQA section 15183.5 and how the CAP will be used to (1) mitigate GHG emissions associated with future actions under the General Plan, and (2) provide GHG analysis streamlining for projects consistent with the General Plan and CAP. See revisions.
E-5	350 Sacramento	CAP	Letter	II. GENERAL COMMENTS 2. Minimal Compliance Strategy - The City's CAP strategy appears to be narrow compliance with State-mandated thresholds of-significance with minimal change to existing processes, rather than considering how it may best mitigate climate change. For instance, the CAP relies heavily on already existing, non-City programs, rather than on initiatives solely in the City's authority, and it is not always clear how the City will add value to these other efforts. The two largest sources of GHG, in the City and Statewide, are local light vehicle miles traveled (VMT) and building energy use. ¹⁰ The primary determinants of GHG emissions from these sources are land-use patterns and the character of the built environment. Both of these are squarely in the City's regulatory purview, and in no other agency's. Given the actual dangers of climate change we suggest that wishing to reap streamlining benefits, without striving for the greatest GHG decrease within the City's reach, is not a responsible goal.	The City disagrees with this characterization. The CAP includes measures that address both reductions in citywide VMT (TACM-2 through TACM-7) and building energy use (BE-1 through BE-8). Implementation of these GHG reduction measures serve to reduce GHG emissions using mechanisms under the City's authority including land use decisions and permitting processes. Additionally, the development of the CAP Checklist will ensure future development projects moving forward will remain consistent with the CAP GHG reduction targets. As stated in the previous comment, the GHG reduction measures included in the CAP provided reductions beyond the City's 2030 target.
E-6	350 Sacramento	CAP	Letter	II. GENERAL COMMENTS 3. DEIR Alternative 2 - Additional Climate Action Measures- The CAP's minimal compliance strategy is related to the rejection of DEIR Alternative 2, which is cited as including, but not limited to, CALGreen Tier 1 building standards, additional transportation measures, a direct offset program, and other emission-reduction options not included in the CAP. ¹¹ Per 350 Sacramento's previous detailed comments, we believe the rationale for discounting Alternative 2 not compelling. We urge the City to adopt Alternative 2.	Based on 350 Sacramento's previous comment on the DEIR, the response to this comment will be addressed in the Final EIR for the General Plan.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
E-7	350 Sacramento	CAP	Letter	<p>II. GENERAL COMMENTS 4. Implementation is Insufficiently Documented- GHG-reduction measures in a qualified CAP should be real and verifiable, through either full enforceability or through substantial evidence in the record that mitigation will be effective^{13, 14}; and deferral of substantive mitigation to a future plan is inappropriate¹⁵. The CAP presents 20 GHG-reduction measures, supported by 83 Action Items. With few exceptions, the proposed actions fail to specify enforceable mechanisms, enabling agreements, work tasks/products, schedules, staff responsibilities, resource needs, and/or funding sources. Most of the insufficiently documented actions fall into one or more of the following categories:</p> <ul style="list-style-type: none"> • The action proposes outreach to help market another entity's voluntary program, without indicating program specifics. • The action proposes partnering to support or augment another entity's voluntary program, without indicating any enabling agreement with that organization or other specifics.¹⁷ • The proposed action defers to future discretionary processes or planning the development of substantive measures, protocols, and/or funding.¹⁸ • The proposed action is described in general aspirational terms such as "encourage", "facilitate", "support", "promote", and "work with", without further specificity. <p>The CAP appropriately proposes targets for each measure, but these do not substitute for credible implementing mechanisms. Please see attached Section III, "Measure-Specific Comments" for more focused discussion. We request that specific, credible implementing mechanisms be identified for all proposed measures.</p>	<p>The CAP document is primarily a long-range policy document that provides specific measures to reduce GHG emissions in both existing and future development, with varying methods and timeframes for implementation. The CAP also serves as a qualified GHG reduction plan per CEQA Section 15183.5, such that applicable measures will be binding and enforceable for certain projects that undergo CEQA review. As a policy-level document, the CAP is intended to provide policy and implementation guidance for each GHG reduction measure; however, it does not provide all the specific details of implementation for each measure, especially for programmatic measures that are not, by nature, regulatory. Some measures will require future work to develop more detailed programs that do not yet exist, the details of which are not currently known and require implementation activities that cannot precede the adoption of the CAP. The City disagrees that the CAP defers substantive mitigation to a future plan. The specific GHG reductions, many of which will be implemented at the project level, are appropriately detailed and will become binding and enforceable mitigation measures at the time of project-level environmental review, per CEQA Guidelines Section 15183.5(b)(1). Furthermore, Chapter 5 of the CAP provides implementation measures including the formation of a Climate Action Team, which will determine specific City departments responsible for implementation of each measure. The specific language and action items under each GHG reduction measure provide overarching guidance for implementation while still providing flexibility for the most effective and appropriate mechanisms to implement each measure to be defined by the responsible City department. Chapter 5 of the CAP also includes Implementation Measure 3: Implementation and Monitoring to ensure the CAP is being effectively implemented and to provide updates to GHG reduction measures as appropriate to ensure the City is on target to meet its GHG reduction targets.</p>
E-8	350 Sacramento	CAP	Letter	<p>II. GENERAL COMMENTS 5. Other Implementation Measures- In addition to the above-mentioned Action Items presented with the 20 GHG reduction measures, the CAP presents six "Implementation Measures".²⁰ However, these do not remedy the lack of detail discussed above. Five of the six measures describe CAP-related administrative functions and future discretionary actions to develop such functions; the sixth repeats a generalized aspiration to partner with other entities. Identifying enabling administrative tasks is certainly appropriate, but does not substitute for clear commitments to implement substantive measures that directly reduce GHG emissions. General Plan Chapter 10 proposes to establish a "Sustainability and Climate Change" web page, but cites no connection to any CAP measure.²¹ We request that, for purposes of clarification, the five proposed administrative measures in the CAP be categorized as such.</p>	<p>The City disagrees with the characterization of Implementation Measures as being only "administrative functions". To the contrary, the implementation measures in Chapter 5 are the City's commitments to ongoing implementation, monitoring and updating of the CAP. They will guide the City's efforts to implement the measures, monitor their effectiveness, report on progress to decision-makers, and update the CAP over time to ensure it stays on track to meet targets. The specific actions identified under each measure in Chapter 4 contain the detailed actions required to implement the measures.</p> <p>Chapter 5 of the CAP will be updated to include a reference to the creation of the Sustainability and Climate Change web page, consistent with the Draft General Plan, and which could be used to track the CAP's progress and solicit feedback from the public.</p>
E-9	350 Sacramento	CAP	Letter	<p>II. GENERAL COMMENTS 6. Technical Assumptions- We question some assumptions used to calculate GHG reductions, especially for voluntary measures. We will seek clarification on these and may comment further</p>	<p>See responses to Attachment 1 for specific responses to comments on Technical Assumptions.</p>
E-10	350 Sacramento	CAP	Letter	<p>II. GENERAL COMMENTS 7. Funding Sources - The CAP cites no potential funding sources for implementation of GHG-reduction measures, and defers to future discretionary actions identification, pursuit, and budgeting of such funds. Identifying potential sources in the CAP would not decrease the need to document committed funding as part of a credible mitigation plan, but would be a step in that direction. GHG reduction measures can be underwritten through the California Climate Investment Program funded by Cap-and-Trade auction proceeds. In FY 2018-19, over \$1.5 billion was appropriated to this Program for new and existing projects, a substantial portion of which is administered by a number of State agencies as pass-through grants available to local governments and others. We request that the CAP include a summary of this and other funding opportunities available to the City to help implement GHG-reduction measures.</p>	<p>The CAP will be updated to note the range of potential funding sources that could be used to implement the GHG reduction measures contained in the CAP. However, given that some funding is based upon grants, which change over time, it would be speculative to assume that a specific funding source will occur.</p>
E-11	350 Sacramento	CAP	Letter Attachment 1	<p>BE-1: Given that more and more of SMUD's energy is being generated by renewable, non-GHG emitting sources, why do lower participation rates in the 2018 Update result in higher GHG reductions than forecast in 2013?</p>	<p>The 2013 CAP incorrectly summarized the energy savings associated with this measure when multiplying the kWh savings by the emissions factor. As shown under the "Residential Quantification" heading, total electricity savings per year in kWh was quantified as 5,451,518 but under the "Energy/GHG Summary" heading, residential energy savings in kWh is reported as 1,068,925, which is only the electricity savings associated with outreach. This number mistakenly excludes the anticipated reduction in electricity consumption due to monitoring. Thus, the GHG reductions reported in the 2013 CAP were underestimated for BE-1. No edits are needed for BE-1 in the 2018 CAP.</p>

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E-12	350 Sacramento	CAP	Letter Attachment 1	Overall comment: The measures mention some outreach media types but fail to specify enforceable mechanisms, enabling agreements, work tasks/products, schedules, staff responsibilities, resource needs, or funding sources.	As a policy-level document, the CAP is intended to provide policy and implementation guidance for each GHG reduction measure but not to provide all the specific details of implementation for each measure. Chapter 5 of the CAP provides implementation measures including the formation of a Climate Action Team, which will determine specific City departments responsible for implementation of each measure. The specific language and action items under each GHG reduction measure provide overarching guidance for implementation while still providing flexibility for the most effective and appropriate mechanisms to implement each measure to be defined by the responsible City department. Chapter 5 of the CAP also includes Implementation Measure 3: Implementation and Monitoring to ensure the CAP is being effectively implemented and to provide updates to GHG reduction measures as appropriate to ensure the City is on target to meet its GHG reduction targets.
E-13	350 Sacramento	CAP	Letter Attachment 1	BE-2: Given that more and more of SMUD's energy is being generated by renewable, non-GHG emitting sources, why do the same household participation and use rates in 2020 now result in 67% more GHG reductions when no new research reports are cited in the 2018 Update?	This measure has now been revised in the 2018 CAP based on recently available data from SMUD.
E-14	350 Sacramento	CAP	Letter Attachment 1	BE-3: We recommend that the City mandate heat pump installation for water and space heating.	Due to restrictions in the California Building Code, this type of mandate is not possible. As described in New Buildings Institute's report on this, "The Energy Policy and Conservation Act (EPCA) of 1975 extended preemption to certain HVAC and hot water equipment." This includes heat pumps. See the entire report here: https://newbuildings.org/wp-content/uploads/2017/06/NBI_FederalPreemptionAsaBarrier.pdf
E-15	350 Sacramento	CAP	Letter Attachment 1	BE-4: How can the CAP take credit for a 59 MTCO2e emission reduction from a measure that is optional and not required by the City Planning Commission and Council? We recommend that the City mandate new residential and commercial construction that comply with the following standards under the current California Green Standards Building Code (CALGreen).	This measure would be mandatory for projects subject to CEQA review that are not exempt; it is one of the applicable measures that would apply to new development projects seeking to tier and streamline per CEQA Section 15183.5. Projects that are exempt from CEQA would comply with State-mandated energy efficiency standards for new construction. Additionally, assumptions for this measure have been revised in the 2018 CAP and now assumes CALGreen Tier 1 compliance with 5% of new residential units and nonresidential developments by 2020 and 10% by 2030. This measure would apply to residential units until 2030, when ZNE requirements would be phased in. No revisions proposed.
E-16	350 Sacramento	CAP	Letter Attachment 1	BE-5: How can the CAP take credit for a 24,333 MTCO2e GHG emission reduction without committing the City to adopt ZNE standards now—to be effective January 1, 2020—for at least residential construction?	BE-5 would commit the City to require all new non-exempt residential development wishing to streamline through the CAP checklist to commit to ZNE development beginning in 2020. GHG emissions reductions would not be realized in 2020 but would result in emissions reductions by 2030 because the measure and CAP Checklist benefits would be in place for new development over 10 years (i.e., 2020 to 2030). Since the release of the Draft CAP, the 2019 Title 24 Building Energy Efficiency Standards have been adopted. BE-5 has now been updated to reflect this change in building standards, as well as the potential GHG emissions reductions from this measure. No further revisions required.
E-17	350 Sacramento	CAP	Letter Attachment 1	BE-5: In the absence of an adoption commitment in the CAP, how will builders be able to plan for the types of residential construction requirements that will be in place only 16 months from today?	Because the adopted 2019 Title 24 Building Energy Efficiency Standards, which have been adopted since release of the Draft CAP, do not achieve full ZNE development as anticipated in the Draft CAP, this measure has been adjusted to encourage ZNE through the CAP checklist beginning in 2020 and will require ZNE standards for new development at a future date when the state has fully developed standards for ZNE development. The 2019 Title 24 Building Energy Efficiency Standards are getting closer to ZNE standards for residential development, which requires builders to adjust building practices to meet these standards.
E-18	350 Sacramento	CAP	Letter Attachment 1	BE-5: We recommend that the City mandate energy efficiency retrofits of added attic insulation for existing owner-owned and rental homes at specified trigger points during the lifecycle of the housing stock	We understand this comment to apply to BE-6, which requires green building practices in existing buildings. In regards to BE-6, this measure has been revised since release of the Draft CAP to focus on building electrification rather than exceedance of building standards for existing buildings. This aligns with SMUD's goals and incentive programs and designates the City as a supporter of these programs. The City is not pursuing a point-of-sale retrofit requirements and notes this comment.

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E-19	350 Sacramento	CAP	Letter Attachment 1	BE-5: contains no substantive mitigation measures with which an applicant could comply; and a qualified CAP must present substantive GHG mitigation, which Measure BE-5 does not do.	BE-5 would be implemented through CAP Checklist and would be required for all projects wishing to streamline environmental review through the CAP Checklist. A qualified CAP must present substantive GHG mitigation for development wishing to streamline environmental review through CEQA Section 15183.5, which this measure does by requiring implementation of BE-5 for all development wishing to streamline through the CAP Checklist.
E-20	350 Sacramento	CAP	Letter Attachment 1	BE-7: Given that this measure in the 2013 CAP was to be implemented shortly after CAP adoption in 2013 and produce 510 MTCO2e emission reduction by 2020, how does the same measure implemented in 2018 achieve 1,076% more GHG emission reductions by 2020?	The numbering of CAP measures has changed between the 2013 and 2018 versions of the CAP, which accounts for this discrepancy. The 2013 CAP estimated 9,154 MTCO2e reduction from solar PV by 2020. The 2018 CAP estimates approximately 4,308 MTCO2e from this measure, with a significantly lower participation rate resulting in the lower reduction achieved.
E-21	350 Sacramento	CAP	Letter Attachment 1	Overall comment: How can the CAP Update take credit for any GHG emission reductions when this is a voluntary measure?	The CAP includes some measures which achieve GHG reductions through voluntary action and behavior change on the part of residents. The City can help to promote these changes through promotion and incentives. For the cases in which the CAP takes credit for GHG reductions from voluntary measures, quantification of these measure is conservative and assumes a low participation rate. Because implementation of all the GHG reductions measures will ensure the City meets and exceeds the 2030 target, low participation rates are assumed for voluntary measures, with the provisions that if participation exceeds the low rates assumes, the City will be able to achieve additional GHG reductions.
E-22	350 Sacramento	CAP	Letter Attachment 1	BE-7: The CAP does not address the large-scale community solar projects that can serve low-income communities.	The City has added a measure to work with SMUD and non-profit organizations to identify locations for larger-scale solar installations that could serve low income communities. Note that full implementation of this measure requires action by SMUD.
E-23	350 Sacramento	CAP	Letter Attachment 1	BE-8: What level of City funding is being proposed to promote the SMUD Greenergy Program, with its voluntary monthly surcharge of \$6.00 per customer for 100% renewable energy, to raise participation from the current 9% to 15% by 2020?	When the City decides to implement this measure following adoption, the City will work with SMUD to determine how to increase participation. The measure commits the City to create the program and determine funding. Program specifics cannot be determined until after adoption of the CAP, at which time the City will work with SMUD to identify the specific costs, which would then determine how much funding is needed and in turn sources of funding to cover the costs.
E-24	350 Sacramento	CAP	Letter Attachment 1	RC-1: Figure 4-4 Please indicate how reductions in MTCO2E were quantified.	Reductions were quantified using the baseline diversion rate for the City (75%) and associated tonnage disposed (80,850). A MTCO2e/ton of waste was derived (0.29) using 2013 data and was then applied to the increased tonnage of diverted waste for the target years. Refer to Appendix B of the CAP for more details. All assumptions used in the GHG reduction measures are provided and explained in Appendix B of the CAP.
E-25	350 Sacramento	CAP	Letter Attachment 1	RC-1: Please indicate the baseline used	See response above for baseline data.
E-26	350 Sacramento	CAP	Letter Attachment 1	RC-1: Please describe the City's waste reduction programs for residents and businesses and provide estimated tons of CO2 reduction.	GHG emissions reductions from existing programs were already covered in the baseline inventory for the City. Programs that already exist do not require separate quantification because emissions reductions are reflected in the baseline and the forecasts. To account for additional GHG reductions would result in double-counting. Existing City programs for waste reduction can be found here: http://www.elkgrovecity.org/city_hall/departments_divisions/garbage_recycling .
E-27	350 Sacramento	CAP	Letter Attachment 1	RC-1: Businesses that may have their food waste and grease picked up for a fee relies upon businesses voluntarily paying for pickup without realizing any economic benefit. What quantity of GHG reductions would be derived from this initiative?	This is an existing program, not a new measure; thus, no additional GHG reductions are attributed.
E-28	350 Sacramento	CAP	Letter Attachment 1	RC-1: We recommend that the City adopt a Zero Waste goal, and specify to where waste will be diverted in calculating GHG reductions	As noted by commenter, other local jurisdictions are committing zero waste goals. The State standard is for 75% diversion by 2020, which the City has achieved. In consultation with the City's Recycling and Waste Division, staff is recommending the following targets be established for the City. Staff is concerned with setting a target for a 100% diversion as this may not be achievable. - 2020: 75% diversion (consistent with State standards, already achieved) - 2030: 80% diversion - 2040: 90% diversion - 2050: 95% diversion

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
E-29	350 Sacramento	CAP	Letter Attachment 1	TACM-1: Why does the City 2018 budget mention nothing at all about the infrastructure and promotional needs of this farmer's market expansion?	The comment suggests that the current City budget account for future programs associated with implementation of the CAP. However, the updated CAP is not yet adopted and it is not possible for the City's budget to fund future actions of long-range plans that have not yet been adopted. The City will take note of these comments, and if the CAP is adopted, consider funding any necessary programs to implement the measures in future City budgets.
E-30	350 Sacramento	CAP	Letter Attachment 1	TACM-2: Since the citywide density of Elk Grove has increased from 2013 (5.8773 pop./ac.) to 2018 (6.3728 pop./ac.) by 8.43%, how does the City plan to expand its population density by an additional 49.57% by 2020?	Given the proximity of the year 2020 to the anticipated date of adoption of the CAP, this measure is being revised to only include GHG reductions for the 2030 target date.
E-31	350 Sacramento	CAP	Letter Attachment 1	TACM-6: These measures indefinitely defer substantive mitigation, pending the proposed future planning and discretionary adoptions	The City disagrees with the characterization that mitigation is deferred. TACM-6 references a specific General Plan policy and associated implementation programs that are specific and will be implemented on a project-by-project basis. Refer to the action items under TACM-6 for details on implementation, as well as the detailed implementation procedures identified in the General Plan. Additionally, GHG reductions were not quantified for TACM-6 to avoid double-counting reductions with other TACM measures.
E-32	350 Sacramento	CAP	Letter Attachment 1	TACM-8: defer substantive revision of standards to a future discretionary action.	The City disagrees with the characterization that mitigation is deferred. The requirement will be implemented on a project-by-project basis. For projects subject to CEQA and not exempt, it will be required through the CAP Consistency Checklist. For projects not subject to CEQA, this measure will be implemented through existing regulations, including the grading permit process administered by SMAQMD.
E-33	350 Sacramento	CAP	Letter Attachment 2	SECTION 2. TARGETS: We request that Elk Grove take a leadership role in addressing climate change by embracing aggressive targets. The per capita targets taken from the 2017 ARB Climate Change Scoping Plan are based on Executive Order B-30-15 and AB/SB 32, which were created more than a decade ago. At a minimum, Elk Grove's plan should align with Governor Brown's Executive Order B-55-18 to achieve carbon neutrality by 2045. This target is more in-line with the work of climate scientist Kevin Anderson, whose research indicates that staying below 2°C degrees without reliance on negative emission technologies ³ calls for developed countries like the US to quickly ratchet up to 15-16% per year and continue at this rate until virtually all greenhouse gases are eliminated by 2035-2040. ⁴ Considering the immensely disruptive effects of current climate trends, we believe this is the most appropriate goal for the GHG-reduction element of Elk Grove's climate action plan. 350 Sacramento also requests translating the emission reduction plan that the city chooses into a carbon budget. ⁵ Annual monitoring against a carbon budget is important regardless of which emission reduction targets the city adopts, because the temperature increase we experience is not determined by whether we meet an emission reduction target in 2030 or 2050, but how much total CO2 we put into the atmosphere.	Governor Brown's Executive Order B-55-18 was released after the Draft CAP document was released for public review. Additionally, the target set in Governor Brown's Executive Order B-55-18 serves as a long-term policy goal, but it has not yet been codified into law by the State legislature or incorporated into CARB's Climate Change Scoping Plan. The 2030 and 2050 per capita targets set in the 2017 Scoping Plan still serve as the best GHG reduction target guidance for City's to set their reduction targets. Future CAP updates could incorporate more stringent targets in future updates to the Scoping Plan include adjusted targets based on Executive Order B-55-18, should the State legislature establish a new statutory target. The City may consider including a discussion of Governor Brown's Executive Order B-55-18 in discussion regarding pertinent regulations to the CAP, keeping original targets in place but mention that future CAP updated could include 2045 targets subject to future State legislative actions. Many of the commenter's suggestions in Attachment 2 are already included in the CAP. The CAP includes Implementation Measure 3 to monitor implementation of the CAP and progress towards the GHG reduction targets as well as adjusting ineffective measures in future CAP updates.
E-34	350 Sacramento	CAP	Letter Attachment 2	SECTION 3. TRANSPORTATION & LAND USE [SEE COMMENT LETTER FOR DETAILS]	The CAP currently includes measures similar to those suggested by the commenter including encouraging high-density, infill, mixed-use development (TACM-2, TACM-5), reducing VMT (TACM-6), improving mass transit (TACM-3), use of complete streets program (GP Chapter 6: Mobility, Policy MOB-3-1 through Policy MOB-3-13), developing a robust active transportation network (TACM-4), supporting EVs (TACM-9), and encouraging car sharing and reducing travel demand through Transportation Systems Management (TACM-3).
E-35	350 Sacramento	CAP	Letter Attachment 2	SECTION 4. ENERGY EFFICIENCY & RENEWABLE ENERGY [SEE COMMENT LETTER FOR DETAILS]	The CAP includes a series of measures to address building energy use and energy efficiency under the Built Environment policy topic in Chapter 4. Many of the suggestions included in Attachment 2 to the comment letter are included in CAP including building energy efficiency standards, use of SMUD's SolarShare program. The updated measure BE-6 now specifically focuses on building electrification in new and existing buildings. The City has added a measure relative to solar installations benefiting low-income communities (see E-22).

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
E-36	350 Sacramento	CAP	Letter Attachment 2	SECTION 5. WASTE MANAGEMENT & RECYCLING [SEE COMMENT LETTER FOR DETAILS]	The strategies suggested by the commenter will be addressed through the Resource Conservation measures included in the CAP (RC-1 and RC-2). AB 1826 and SB 1383 will also require the City to implement many of the suggestions discussed by the commenter to achieve the diversion goals set in these bills. As noted above under Response E-28, the City is proposing a 95% diversion rate by 2050.
E-37	350 Sacramento	CAP	Letter Attachment 2	SECTION 6. AGRICULTURE, OPEN SPACE & URBAN GREENING [SEE COMMENT LETTER FOR DETAILS]	Some of the strategies suggested by the commenter are already included in the CAP such as tree planting (BE-9). Many of the suggestions made by the commenter are included as policies in the City's GPU Chapter 7: Community and Resource Protection such as open space conservation, water conservation effort, and urban greening projects. No revisions are proposed.
E-38	350 Sacramento	CAP	Letter Attachment 2	SECTION 7. PUBLIC HEALTH & SUSTAINABLE COMMUNITIES [SEE COMMENT LETTER FOR DETAILS]	The suggestions under this section pertain specifically to climate adaptation which is addressed in Chapter 8: Services, Health, and Safety of the GPU. Specifically, GOAL ER-6: An adaptable and resilient community specifically addresses goals and policies to adapt to climate change. Chapter 12 of the GPU includes a Vulnerability Assessment for the City. Climate adaption strategies are included directly in the GPU rather than in the CAP document. No revisions are proposed.
E-39	350 Sacramento	CAP	Letter Attachment 2	SECTION 8. COMMUNITY INVOLVEMENT & ENGAGEMENT [SEE COMMENT LETTER FOR DETAILS]	Many of these strategies suggested by the commenter in Attachment 2 are included in the Implementation Chapter of the CAP (Chapter 5) such as working with regional partners.
E-40	350 Sacramento	CAP	Letter Attachment 2	General Comment	Many of the suggestions included in Attachment 2 are good suggestions for specific implementation strategies for various GHG reduction measures but they are too specific to be included in the CAP. The specific implementation strategies should be considered more thoroughly as part of CAP implementation, and also could be accomplished through engagement of the Climate Action Planning Committee.
F-1	Rick Codina	CAP	Letter submitted to Planning Commission 12/6/18	Bulk of the recommendations in section 4.1 rely on voluntary compliance. Without stronger City incentives or ordinances, this largely educational approach misses some long-term opportunities for more substantial savings. Specifically, electric heat pumps, increasing energy efficiency for existing housing stock, and City participation in the SMUD SolarShares program.	Comments noted. The City is participating in SolarShares for the Civic Center complex.
F-2	Brian Guerdat	CAP	Letter submitted to Planning Commission 12/6/18	Encourages the City to be carbon-neutral by 2045; notes the public health impacts of climate change.	Comment noted.
F-3	Oscar Balaguer	CAP	Letter submitted to Planning Commission 12/6/18	Notes prior comments to the City from Sacramento 350. Encourages the City to attend a meeting of Sacramento/West Sacramento's "Commission on Climate Change" on November 26, 2018.	Comment noted. City staff attended the meeting on November 26, 2018 and will be monitoring the efforts.
F-4	William Myers	CAP	Letter submitted to Planning Commission 12/6/18	Notes that a CAP designed to meet State requirements is "not in itself adequate to address the needs of our city's citizens to deal with climate change." Encourages the City to develop broader and longer range policies "rather than mere bureaucratic necessity requirements." Proposes that the City create an Elk Grove Intergenerational Climate Change Forum.	Comment noted.
F-5	Dr. Glayol Sahba	CAP	Letter submitted to Planning Commission 12/6/18	Recommend following the recommendations of 350 Sacramento.	See above comments and responses relative to correspondence from 250 Sacramento.
F-6	Megan Elsea, Nancy Castignetti, Trina Lee, and Marty Adams-Wiley	CAP	Letter submitted to Planning Commission 12/6/18	The draft CAP has measures that are fine as ideas, but they're not convincing because there's very little clear description of how the City will really deliver. It is not okay for Elk Grove to just wait for the State to impose stronger measures because, in California, cities and counties control land use and building codes - not the State or any other agency. Other cities are adopting aggressive climate goals. Sacramento and West Sacramento have pledged to be "carbon-zero" by 2045.	The State of California prepares and adopts the Building Code and Energy Code. All jurisdictions in the State are required to adopt these codes. While local agencies may adopt more stringent requirements, any increased energy requirements are subject to State approval. The City is monitoring the efforts of Sacramento and West Sacramento. No changes proposed.
F-7	Michael Monasky	CAP	Letter submitted to Planning Commission 12/6/18	Transit planning favors the quick and expedient to the exclusion of people-powered activities. Few, if any, pedestrians are to be found on our streets; with one exception - students walking to and from school. For years the planners, the council, and the builders have engineered our byways for speed, not safety. Reducing vehicle miles traveled is essential to stemming the tide of global warming; but the body count would be higher should drivers abandon their vehicles and decide to walk. Traffic needs to slow down and pedestrian flows segregated.	Comment noted. The Draft General Plan addresses the topic of vehicle miles traveled by setting thresholds of significance consistent with State guidelines. The draft Transportation Analysis Guidelines provide the procedures for implementing this policy through specific project reviews. The draft CAP notes these thresholds and incorporates the reductions as part of the GHG reduction strategy. New development areas, such as the Southeast Policy Area, include more extensive trails that in prior developments and requirements for larger sidewalks.
F-8	SMUD	CAP	Letter submitted to Planning Commission 12/6/18	SMUD is supportive of the revisions that the Elk Grove staff has proposed in the December 2018 Planning Commission packet. SMUD also encourages the City to consider higher goals. Suggests 15% of parking stalls be EV charging ready. Consider off-site solar as an option for new residences. Supports staff recommendation to encourage electrification in new and existing residential development.	Comment noted. The Planning Commission reviewed the draft EV charging requirements at its meeting on December 6, 2018 and is recommending a revised requirement of conduit installation for new development.

General Plan Update - Public Comment Tracking Sheet - As of January 4, 2019

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
F-9	Theodore Goodwin	CAP	Letter submitted to Planning Commission 12/6/18	The EIR submitted for the City of Elk Grove's proposed Updated General Plan and Climate Action Plan is lawfully defective, because it does not propose specific, concrete, mitigation measures, available at present and in the future, that are fully enforceable through permit conditions, agreements, or other measures.	The draft CAP and draft EIR are consistent with CEQA Guidelines Section 15183.5.
F-10	350 Sacramento	CAP	Letter submitted to Planning Commission 12/6/18	Gratified by proposed measure TACM-9 that provides for EV charging stations. Proposed changes do not address the issues identified in prior correspondence. Changes presented in the staff report do not provide a basis for informed decision because, except for TACM-9, they do not seem to display actual proposed language changes. Attached comments from ECOS relative to the proposed Study Areas. Reiterate prior concerns relative to TACM-6 implementation and the failure to adequately consider the land use/vehicle miles traveled connection.	Comment noted. The Planning Commission reviewed the draft EV charging requirements at its meeting on December 6, 2018 and is recommending a revised requirement of conduit installation for new development.
F-11	Kent Lacin	CAP	Letter submitted to Planning Commission 12/6/18	Encourages the City to adopt a strong CAP, similar to what was prepared for Sacramento.	Comment noted. The Sacramento CAP is part of the General Plan and only addresses GHG emissions through 2035. Staff has not identified any example programs that could be transferred to Elk Grove.
F-12	Guy Hall, John Driebe	CAP	Letter submitted to Planning Commission 12/6/18	CAP should identify emissions from City vehicle fleet. City should target gas cars. Develop an Electric Vehicle Strategic Plan	City operations emissions are included in the overall GHG numbers. The City's fleet is generally limited to police and transit vehicles. As technology improves the City will look at transitioning the EV police vehicles. The City is applying for grants for electrification of the transit fleet.
F-13	Lynn Wheat	CAP	Letter submitted to Planning Commission 12/6/18	Agricultural operations generate less greenhouse gas emissions than urban development. Reduce the loss of farmland to reduce GHG impacts.	Comments noted.
F-14	Suzanne Pecci, Resident	CAP	Letter submitted to Planning Commission 12/6/18	CAP needs a discussion of climate change's impact on water and suggest that basic information on local, regional, and statewide be referenced in the CAP.	The CAP focuses on GHG reduction strategies. The comments are more about climate resiliency. The City is preparing a Resiliency Plan that will look at flooding and heat impacts.
F-15	Suzanne Pecci, Resident	CAP	Letter submitted to Planning Commission 12/6/18	Chapter 2, page 2-5 "The city will continue to study hydrology patterns, water Quality, land use, native species and many other sectors that could be affected by climate change." What would some of these other "sectors" be. What form will this studying take? How will the public be involved in these studies? Are there plans for a community advisory committee?	See comment F-14
F-16	Suzanne Pecci, Resident	CAP	Letter submitted to Planning Commission 12/6/18	Pg 2-9. Decreasing supply of Freshwater. With these supplies declining, water shortages for all uses in the planning area may be affected." Please clarify what exactly this means —doesn't make sense as written. How these water shortages will be addressed are not part of this report?	The Climate Action Plan addresses greenhouse gas emissions. This topic would be better addressed through a resiliency plan.
F-17	Suzanne Pecci, Resident	CAP	Letter submitted to Planning Commission 12/6/18	Pg 2-9 increased Severity and Frequency of flood Events This section should contain a discussion of the existing farmer levee system in RD 800 along the Cosumnes River affording only 10-year protection to the future Study Area along Grant Line planned for urbanization. Need to improve the levees for 100 -200 -500 year protection should be included in the CAP.	This is a Resiliency issue that will be discussed in the Resiliency Plan. No changes to the CAP are proposed.
F-18	Suzanne Pecci, Resident	CAP	Letter submitted to Planning Commission 12/6/18	Pg 2-12 Water conservation. "FRCD has received funding from the DOC to implement Community conservation Education Programs". ...thru Spring of 2018.." This section should be update to reflect recent changes to the role of FRCD being that they will be involved in water related projects benefiting EGWD only.	Comment noted.
F-19	Suzanne Pecci, Resident	CAP	Letter submitted to Planning Commission 12/6/18	Chapter 3, Pg 3-9 Bullet Point SB X7 (The Water Conservation Act of 2009). This section should be expanded to include the actions water uses in the planning area and the study areas for future urbanization . A chart of the 18 actions to reduce water consumption would make this important section more transparent to the community, rather than stating a legislative act which has to be researched to learn the 18 actions.	Comment noted. A summary of the list of 18 items will be added.
F-20	Suzanne Pecci, Resident	CAP	Letter submitted to Planning Commission 12/6/18	Chapter 5 Pg. 5-2 "CAP implementation requires strong leadership from community leaders, City staff and elected officials". This paragraph only relates of implementation by designated City staff and doesn't address community leadership and involvement. How will the community be involved in CAP? Add language to this section re community responsibilities in implementation and being part of the climate action teams along with City staff. Community advisors need to be in CAP.	Comment noted. The Planning Commission discussed including a committee in the draft CAP and is not recommending this concept. No revisions proposed.
F-21	Suzanne Pecci, Resident	CAP	Letter submitted to Planning Commission 12/6/18	Pg 5-7 Chart TACM-5. How is "affordable housing" related to GHG. Should chart reference instead "low income" and senior housing rather than affordable housing which was discussed previously as being categories that owned fewer cars and drove less, thus contributing less to greenhouse gases.	Affordable housing and its proximity to services and jobs can have a positive impact on greenhouse gases because of reduced commute patterns.
F-22	Suzanne Pecci, Resident	CAP	Letter submitted to Planning Commission 12/6/18	Pg 5-10 Bullet point Action 4.3: How do "Opportunity Sites" located throughout the planning and study areas fit into this funding and CAP? Please explain "Opportunity Sites" relative to government funding, types of projects and greenhouse gas credits.	The comment appears to be referring to Opportunity Zones as used by Federal government to guide investment opportunities. The City does not have any Opportunity Zones.
F-23	Nancy Myers	CAP	Verbal comments at Planning Commission 12/6/18	Stakeholders need to be involved. Book title: "I'm Right and You're an Idiot" – toxic state of public discourse.	Comment noted.
F-24	Bill Myers	CAP	Verbal comments at Planning Commission 12/6/18	a. Impacts happening, will be worse and happening faster. b. Long-term goal should be brought back to 2040. c. Review/update CAP every 3 years, not every 5. d. Citizens need to be involved – create a "Climate Change Forum" so that citizens can support City efforts to implement and update CAP. Broad dialogue, organized, over a 1-year period, bring back ideas. e. Kids problem, not so much our problem.	Comments noted. No revisions are proposed.

Comment #	Commenter Name and Affiliation	Document, Chapter, Page	Source (e.g. Letter, Meeting Date)	Comment	Response
F-25	Greg McAvoy	CAP	Verbal comments at Planning Commission 12/6/18	a. Representing St. Joseph's Catholic Church b. Need bolder plan, 4 characteristics i. Scientists and future generations ii. Integral responses – not just city planning, multidisciplinary iii. Disadvantaged need to benefit iv. Common interests, common good c. Local goods section in CAP is good, could be improved. Need more on how. d. Improving bike infrastructure good. Need better safety.	Comments noted. No revisions are proposed.
F-26	Earl Mithycombe	CAP	Verbal comments at Planning Commission 12/6/18	a. 2013 CAP – reviewed it years ago for ECOS, testified re: deficiencies. b. 2018 CAP – reviewed for 350 Sacramento, authored Attachment 1 to 350 Sac letter. c. Voluntary measures give no assurances. Need obligatory. d. Questionable assumptions. Overestimate of benefits. e. Requests responses to questions, glad to hear will be addressed f. Concern that fault CAP will expose projects to legal challenge trying to tier off General Plan.	Comments noted. No revisions are proposed.
F-27	Muriel Strand	CAP	Verbal comments at Planning Commission 12/6/18	Had not read the draft CAP. Commented that the City should ban leaf blowers. It would create jobs, end fossil fuel addiction, end gardener abuse, and air abuse.	Comments noted. No revisions are proposed.
F-28	Michael Monasky	CAP	Verbal comments at Planning Commission 12/6/18	Challenged notion of “workshop” format for the CAP– concerned that no community conversation about the CAP.	Comment noted.
F-29	Theodore Goodwin	CAP	Verbal comments at Planning Commission 12/6/18	Noted that public agencies need to have mitigation measures that are enforceable. Community participation in dialogue is needed.	Comment noted.
F-30	Bob Lilly	CAP	Verbal comments at Planning Commission 12/6/18	Noted a nexus between green development and existing fee structures. Example provided of Zone 11A drainage fees.	Comment noted. In the case of Zone 11A, the City does not have control over this program. Many City development impact fees will be looked at in 2019 with their regular update and these types of issues may be considered.
F-31	Oscar Balaguer	CAP	Verbal comments at Planning Commission 12/6/18	TACM-9 changes are good. See previous comments.	Comment noted
F-32	Lynn Wheat	CAP	Verbal comments at Planning Commission 12/6/18	Children at-risk, asthma problems in Sac County. Air quality issues. CAP should have strategies for urban farming. Slide on American Farmland Trust says urban land uses average 58 times more than crop production. Urban farming will large trucks off road that transport food long distances. Processing info slide from Yolo County (tomatoes) Minimum requirements are met, but need to do more.	Comments noted. No revisions are proposed.
F-33	Trina Lee	CAP	Verbal comments at Planning Commission 12/6/18	Need bold & ambitious plan, better than Draft CAP. Actions are good for home values, business, and quality of life.	Comments noted. No revisions are proposed.

NOTICE OF CONTINUED HEARING

CITY COUNCIL

CITY OF ELK GROVE

NOTICE IS HEREBY GIVEN that the February 13, 2019 public hearing of the City Council of the City of Elk Grove to consider the **GENERAL PLAN UPDATE and ADOPTION OF THE EIR, MMRP AND STATEMENT OF EXCEPTION, INCLUDING THE CLIMATE ACTION PLAN, TRANSPORTATION ANALYSIS GUIDELINES AND PARK DESIGN PRINCIPLES** has been continued to the regular meeting of **February 27, 2019** to be heard at the hour of 6:00 p.m., or as soon thereafter as the matter may be heard, at City Hall in the Council Chambers, 8400 Laguna Palms Way, Elk Grove, California, 95758.

Posted: February 14, 2019

/s/ JASON LINDGREN
CITY CLERK of the City of Elk Grove



Incorporated July 1, 2000

8401 Laguna Palms Way
Elk Grove, California 95758

CITY OF ELK GROVE

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City of Elk Grove – City Council NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that on **Wednesday, February 13, 2019**, at the hour of **6:00 p.m.**, or as soon thereafter as the matter may be heard, the Elk Grove City Council will conduct a public hearing at City Hall in the Council Chambers, 8400 Laguna Palms Way, Elk Grove, California, to consider the following matter:

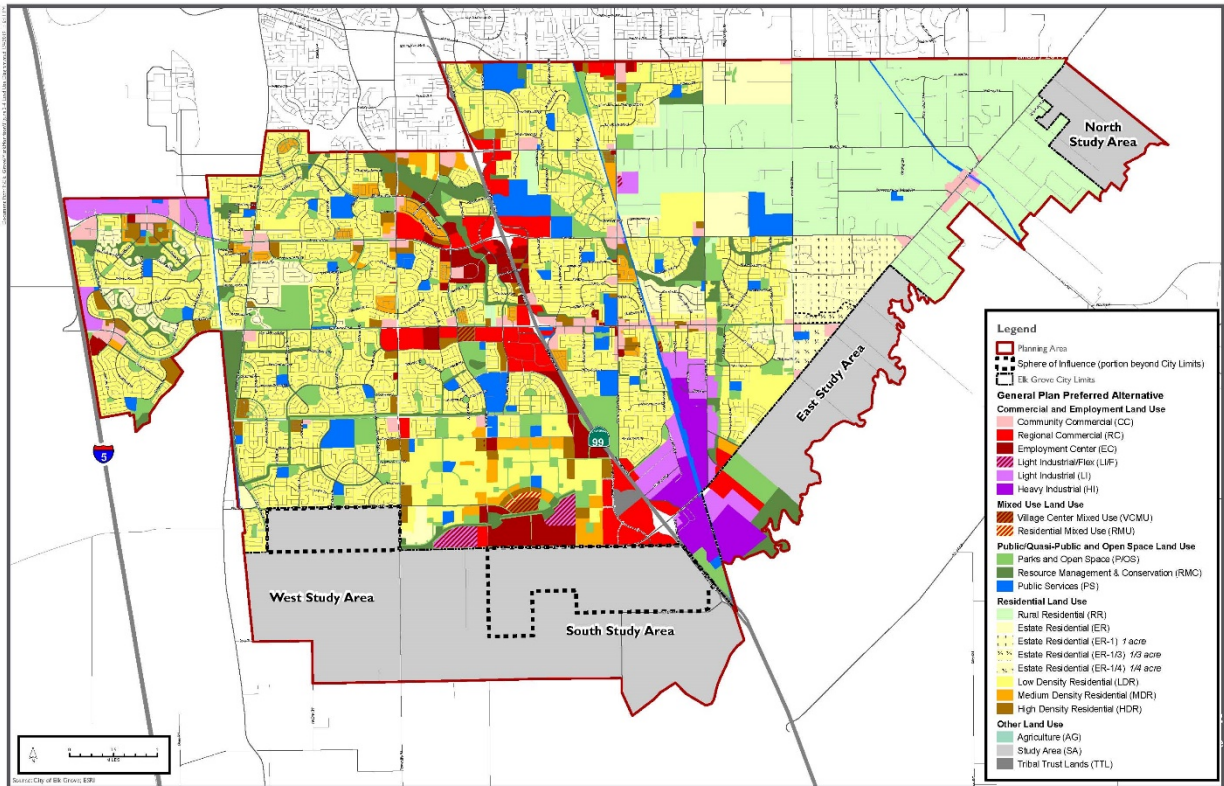
GENERAL PLAN UPDATE (FILE #PL0022) (CITY-INITIATED PROJECT):

The City of Elk Grove is conducting a comprehensive update of its General Plan (Government Code Section 65300). The City's current General Plan was adopted in 2003, with various amendments made since then. The General Plan serves to direct the City's future growth and development, as well as its conservation policy. The General Plan is being updated to ensure it remains a useful tool, keeps pace with change, and provides workable solutions to current and future issues.

The General Plan contains policies and programs designed to provide decision makers with a basis for future decisions as made up of the following sections:

- Chapter 1, Introduction
- Chapter 2, Vision
- Chapter 3, Planning Framework (includes the Land Use Plan, the Transportation Plan, and the Open Space Plan)
- Chapter 4, Urban and Rural Development (includes the Land Use and Housing Elements)
- Chapter 5, Economy and the Region
- Chapter 6, Mobility (includes the Circulation Element)
- Chapter 7, Community and Resource Protection (includes the Conservation and Open Space Elements)
- Chapter 8, Services, Health, and Safety (includes the Noise, Safety, and Environmental Justice Elements)
- Chapter 9, Community and Area Plans (includes the Southeast Policy Area, Rural Area, and Eastern Elk Grove Community Plans)
- Chapter 10, Implementation Strategy
- Chapter 11, Glossary and Acronyms
- Chapter 12, Technical Information

The updated General Plan Land Plan is provided below:



The Planning Commission considered this matter at its regular meeting on January 17, 2019 and voted 4-0 (Maita absent) to recommend certification of the Environmental Impact Report (EIR), adoption of findings of fact and statement of overriding considerations and a mitigation monitoring and reporting program, and adoption of the General Plan.

LOCATION: Citywide

ENVIRONMENTAL: An Environmental Impact Report has been prepared for the General Plan Update. It is available for review at the Development Services Department or online at www.elkgrovecity.org/generalplan.

Information or questions regarding this item should be referred to Christopher Jordan, AICP, (916) 478-2222, or to the office of Strategic Planning and Innovation, 8401 Laguna Palms Way, Elk Grove, CA, 95758. All interested persons are invited to present their views and comments on this matter. Written statements may be filed with the City Clerk at any time prior to the close of the hearing scheduled herein, and oral statements may be made at said hearing.

If you challenge the subject matter in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice or in written correspondence delivered to the City Clerk, 8401 Laguna Palms Way, Elk Grove, CA, 95758, at or prior to the close of the public hearing.

This meeting notice is provided pursuant to Section 23.14.040 of Title 23 of the Elk Grove Municipal Code.

Dated/Published: February 1, 2019

JASON LINDGREN
CITY CLERK, CITY OF ELK GROVE

ADA COMPLIANCE STATEMENT

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Office of the City Clerk at (916) 478-3635. Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting