

2 RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on February 20, 2024. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR. While four verbal comments were received during the public meeting for the Project on February 6, 2024, these comments did not provide input regarding the adequacy of the EIR. Therefore, verbal comments received are not included in this response to comments.

2.1 LIST OF COMMENTERS ON THE DRAFT EIR

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

Table 2-1 List of Commenters

Letter No.	Commenter	Date
AGENCIES		
A1	City of Sacramento Fire Department (SFD) – Fire Planning/Administration King Tunson, Program Specialist	January 20, 2024
A2	California Department of Fish and Wildlife (CDFW) Region 2 – North Central Regional, Habitat Conservation Program Tran Harvey, Senior Environmental Scientist (Specialist)	February 20, 2024
A3	Sacramento Air Quality Management District (SMAQMD) JJ Hurley, Air Quality Planner Analyst	February 20, 2024
A4	Sacramento Regional Transit District (SacRT) Sarah Poe, Planner	February 20, 2024
AGENCY COMMENTS RECEIVED AFTER THE CLOSE OF THE DRAFT EIR COMMENT PERIOD		
A5	City of Sacramento Cheryle Hodge, Principal Planner	February 22, 2024
INDIVIDUALS		
I1	Jordbert Cedillo	February 9, 2024
I2	Kat Chang	February 8, 2024
I3	Janine Comrack	February 8, 2024
I4	Judi Cutaia	February 9, 2024
I5	Crystalyn Denny	February 8, 2024
I6	Lisa Ferrell	February 8, 2024
I7	Walt and Sharon Hess	February 5, 2024
I8	Jayanti Kaur	February 9, 2024
I9	Suzanne Jumper	January 10, 2024
I10	Ray Kapahi	February 15, 2024
I11	Eileen Le	February 9, 2024
I12	Steve Lee	February 6, 2024
I13	Jordan Lumaquin	February 8, 2024
I14	Jay Maestas	February 8, 2024

Letter No.	Commenter	Date
I15	Geoff Mayfield	February 8, 2024
I16	Bonnie McKinnie	January 10, 2024
I17	Michael Monasky	February 20, 2024
I18	Ty Morgan	February 8, 2024
I19	Suzanne Morikawa	February 6, 2024
I20	Michele Nanjo	January 12, 2024
I21	J. Mark Nemmers	January 10, 2024
I22	Utsav Patel	February 8, 2024
I23	Alejo Patten	February 11, 2024
I24	Kimberly Petalcorin	January 10, 2024
I25	Gregoria Ponce	February 10, 2024
I26	Predeep Sandhu	February 1, 2024
I27	Janet Quesenberry	January 16, 2024
I28	Tom Rutsch	February 5, 2024
I29	Jennifer Sallee	January 11, 2024
I30	Art Taylor	February 8, 2024
I31	Tom	February 8, 2024
I32	Karen Trinkaus	February 8, 2024
I33	Gregory Uba	February 8, 2024
I34	Mo Vang	January 10, 2024
I35	Linda Xiong	February 9, 2024

2.2 COMMENTS AND RESPONSES

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

2.2.1 Agencies

Letter
A1

From: [King Tunson](#)
To: [Christopher Jordan](#)
Subject: FW: Elk Grove Zoo Project - Notice of Availability of a Draft EIR
Date: Tuesday, January 30, 2024 11:52:17 AM
Attachments: noa-nzeq-eir-final.pdf
 2-project-description.pdf

You don't often get email from ktunson@sfd.cityofsacramento.org. [Learn why this is important](#)

[EXTERNAL EMAIL]

Hi Christopher,

I have reviewed the documents above and don't have any comments. Thanks

A1-1

King Tunson
 Program Specialist
 Fire Planning/Administration
 Sacramento Fire Department
 5770 Freeport Blvd, Ste 200
 Sacramento, CA 95822
 Office (916) 808-1358
ktunson@sfd.cityofsacramento.org

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Tuesday, January 23, 2024 11:44 AM
To: Anis Ghobril <AGhobril@cityofsacramento.org>; Antoinette Batte <abatte@cityofsacramento.org>; Bill Sinclair <bSinclair@cityofsacramento.org>; Cheryle Hodge <CHodge@cityofsacramento.org>; Dana Repan <DRepan@cityofsacramento.org>; Elizabeth Boyd <EBoyd@cityofsacramento.org>; Ellen E. Sullivan <EESullivan@cityofsacramento.org>; Inthira Mendoza <iMendoza@cityofsacramento.org>; James Switzgable <JSwitzgable@cityofsacramento.org>; Jennifer Donlon Wyant <JDonlonWyant@cityofsacramento.org>; Jennifer Venema <JVenema@cityofsacramento.org>; Jesse Gothan <JGothan@cityofsacramento.org>; Judith Matsui-Drury <JMatsui-Drury@cityofsacramento.org>; Karlo Felix <KFelix@cityofsacramento.org>; King Tunson <ktunson@sfd.cityofsacramento.org>; Marco Gonzalez <MGonzalez@cityofsacramento.org>; Marcus Adams <MAdams@cityofsacramento.org>; Matt Young <myoung@pd.cityofsacramento.org>; Matthew Ilagan <Mllagan@cityofsacramento.org>; Ofelia Avalos <oAvalos@cityofsacramento.org>; Pelle R. Clarke <PClarke@cityofsacramento.org>; Remi Mendoza <RMendoza@cityofsacramento.org>; Steve Jimenez <sJimenez@cityofsacramento.org>; Sean deCourcy <SdeCourcy@cityofsacramento.org>; Zarah Lacson <zLacson@cityofsacramento.org>; Kelly Boyle <KBoyle@cityofsacramento.org>; Victor Randall <VRandall@cityofsacramento.org>
Cc: Brett Ewart <bewart@cityofsacramento.org>; Brett Grant <bgrant@cityofsacramento.org>; Bruce Monighan <BMonighan@cityofsacramento.org>; Cheryle Hodge <CHodge@cityofsacramento.org>; David Edrosolan <DEdrosolan@cityofsacramento.org>; Denise

Malvetti <dmalvetti@cityofsacramento.org>; Fedolia Harris <FHarris@cityofsacramento.org>; Greg Sandlund <GSandlund@cityofsacramento.org>; Jeffrey Heeren <JHeeren@cityofsacramento.org>; Kevin A. Hocker <kHocker@cityofsacramento.org>; Kourtney Burdick <KBurdick@cityofsacramento.org>; Leslie Fritzsche <lfritzsche@cityofsacramento.org>; Leslie Walker <LWalker@cityofsacramento.org>; Matt Eierman <meierman@cityofsacramento.org>; Matt Hertel <MHertel@cityofsacramento.org>; Michael Jasso <MJasso@cityofsacramento.org>; Neal Joyce <njoyce@cityofsacramento.org>; Pravani Vandeyar <pVandeyar@cityofsacramento.org>; Ryan Moore <RMoore@cityofsacramento.org>; Sheri Smith <ssmith@cityofsacramento.org>; Sherill Huun <shuun@cityofsacramento.org>; Stacia Cosgrove <SCosgrove@cityofsacramento.org>; Tom Buford <TBuford@cityofsacramento.org>; Tom Pace <TPace@cityofsacramento.org>; Dustin Hollingsworth <DJHollingsworth@cityofsacramento.org>; Ron Bess <rbess@cityofsacramento.org>

Subject: Elk Grove Zoo Project - Notice of Availability of a Draft EIR

The City of Elk Grove has released a notice of Draft Environmental Impact Report (EIR) for the Elk Grove New Zoo Project. The Project site (Assessor's Parcel Numbers [APNs] 132-0320-010, -001 and -002; and 132-2390-006) is located at the northwest intersection of Kammerer Road and Lotz Parkway (Figure 2-1) in the City of Elk Grove. The Project site is a fallow field surrounded by single-family residences to the east, agriculture to the south and west, and active construction of a new residential subdivision to the north. Attached is the Notice of Availability (NOA) and Project Description for the Draft EIR.

The public review period is from January 5, 2024 to February 20, 2024. The Draft EIR is available for public review at the links on this page.

<https://www.elkgrovecity.org/strategic-planning-and-innovation/new-zoo#eir>

Physical copies are also available at City Hall (8401 Laguna Palms Way) and the Elk Grove Library (8900 Elk Grove Boulevard).

The public and other public agencies are invited to provide comments on the Draft EIR. The public review period will commence on **January 5, 2024**, and end on **February 20, 2024**. Any written comments on the Draft EIR may be submitted to the City at the address below within the public review period. The City will also hold a public meeting on **Tuesday, February 6, 2024, at 6:00pm**, or soon thereafter, to receive public comments on the Draft EIR. The meeting will be held in the City Council Chambers at 8400 Laguna Palms Way.

Comment letters must be sent to:

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

Thank you.

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

LETTER A1 SACRAMENTO FIRE DEPARTMENT

King Tunson, Program Specialist
January 30, 2024

A1-1 The commenter states that they have reviewed the New Zoo at Elk Grove EIR and do not have any comments. This comment is noted.

Letter
A2

From: Tran_Harvey@Wildlife
To: [Christopher Jordan](#)
Cc: Wood_Dylan@Wildlife; [Wildlife R2 CEQA](#); Sheva_Tanya@Wildlife; Kilgour_Morgan@Wildlife
Subject: SCH #2022110393 - New Zoo at Elk Grove DEIR - CDFW comments 2022-0453-0000
Date: Tuesday, February 20, 2024 3:50:10 PM

You don't often get email from harvey.tran@wildlife.ca.gov. [Learn why this is important](#)

[EXTERNAL EMAIL]

To Christopher Jordan:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Draft Environmental Impact Report (DEIR) from the City of Elk Grove, for the New Zoo at Elk Grove (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.

CDFW ROLE

CDFW is California’s Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect fish and wildlife resources.

A2-1

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW’s lake and streambed alteration agreement (LSAA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in “take” as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

This proposed Project is located at the northwest corner of Lotz Parkway and Kammerer Road in the City of Elk Grove in Sacramento County. The Project would involve the construction and operation of a zoological park and associated support and operational, retail, and guest services facilities in the City of Elk Grove. The approximately 100-acre Project site is located on a vacant site. The Project would include a new Special Planning Area (SPA) referred to as the Zoological Park SPA, development of the zoo, parking facilities, off-site public infrastructure improvements, and an animal browse program. Stormwater will be directed into

A2-2

the Shed C Channel by outfalls from new detention basins. The Shed C Channel is an excavated agricultural drainage channel that runs along the northern boundary of the Project site. The New Zoo would be constructed in phases as Project funding allows.

A2-2
cont.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City of Elk Grove in adequately identifying and, where appropriate, mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the following items be addressed in the draft CEQA document:

Comment 1: 2.5.1 Other Local and Regional Agency Approvals - State, page 2-42

The DEIR states that a Streambed Alteration Agreement would be needed. However, there is no mention of what Project activities would impact resources under Fish and Game Codes Section 1602 and require a Streambed Alteration Agreement. It is mentioned on page 2-17 that stormwater from the Project site will be directed to Shed C channel through outfalls from nearby future detention basins. The construction of the outfall could obstruct the natural flow of the stream, impact the material from the bed, channel or bank, and/or fill entering the tributaries. CDFW recommends that the Project proponent includes the outfall installation activities at the Shed C channel in their notification for a Streambed Alteration Agreement.

A2-3

Further information on CDFW’s Notification and our online permitting portal can be found at <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

If CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource based on a Project notification under Fish and Game Codes Section 1602, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources.

To address this comment, CDFW recommends the draft DEIR be modified to make it clear what Project activities will impact resources under Fish and Game Codes Section 1602 and require a Streambed Alteration Agreement. If the outfall construction will potentially impact the Shed C channel, then the DEIR should state that the activity will require a Streambed Alteration Agreement.

Comment 2: Mitigation Measure 3.3-1a Burrowing Owl, page 3.3-18

The DEIR includes a mitigation measure for burrowing owls (*Athene cunicularia*). The measure differs from what CDFW recommends in the *Staff Report on Burrowing Owl Mitigation* (CDFW, March 7, 2012) (Staff Report). More specifically, the measure states that a buffer be a “minimum of 150 feet around the active, nonbreeding burrow but may be reduced in consultation with CDFW.” CDFW recommends that the buffer be at least 50 meters (164 feet) and up to a maximum of 500 meters (depending on expected level of disturbance) during that time frame as stated in the Staff Report. In addition, the measure does not include passive relocation of the burrow owls during the non-breeding season. While CDFW discourages

A2-4

relocation of the burrowing owls and prefers that the burrowing owls leave the Project site at their own volition, CDFW also recognizes that relocation may be necessary to prevent injury/mortality from Project activities.

To address this comment, CDFW recommends that the DEIR modify the Mitigation Measures to match the Staff Report in regard to buffers during the non-breed and breeding seasons and include language to allow for passive relocation as a last resort. Example language is provided below:

“1. Burrowing Owl Surveys. Permittee shall conduct a burrowing owl survey over all suitable habitat present within Project area. Burrowing owl surveys shall be conducted by the Designated Biologist in accordance with the protocol described in the *Staff Report on Burrowing Owl Mitigation* (CDFW, March 7, 2012). If possible, surveys should be conducted during both the breeding (February 1 – August 31) and non-breeding seasons (September 1 – January 31) immediately preceding the planned start of construction activities to ascertain the seasonal residency status of any owls occupying the site. The presence of burrowing owl or their sign anywhere on the site or within a 500-foot accessible radius around the Project site shall be recorded and mapped. Surveys shall disclose all burrows and occurrence of sign of burrowing owl on the Project site and within the 500-foot buffer. Results of the survey shall be submitted to CDFW.

2. Burrowing Owl Take Avoidance. During the breeding season (February 1 to August 31), surveys shall document whether burrowing owls are nesting in or within 500 feet of the Project area. During the non-breeding season (September 1 to January 31), surveys shall document whether burrowing owls are using habitat in or directly adjacent to any area to be disturbed. Survey results shall only be valid for the season (breeding or non-breeding) during which the survey was conducted. If a lapse in Project-related work of fifteen (15) calendar days or longer occurs, another focused survey and consultation with CDFW shall be required before Project work can be reinitiated. If a burrowing owl or evidence of presence at or near a burrow entrance is found to occur within 500 feet of the Project site, the following measures shall be implemented:

2.1 If burrowing owls are found during the non-breeding season (approximately September 1 to January 31), the Project applicant shall establish a minimum 160-foot (50-meter) buffer zone around active burrows. The buffer zone shall be flagged or otherwise clearly marked. Measures such as visual screens may be used to further reduce the buffer with CDFW approval and provided the Designated Biologist confirms that such measures do not cause agitated behavior.

2.2 If burrowing owls are found during the breeding season (approximately February 1 to August 31), the Project applicant shall:

- a. Avoid all nest sites that could be disturbed by Project construction during the remainder of the breeding season or while the nest is occupied by adults or

A2-4
cont.

young (occupation includes individuals or family groups foraging on or near the site following fledging).

b. Establish a minimum 656-foot (200-meter) non-disturbance buffer zone around nests, unless otherwise approved by CDFW in writing. The buffer zone shall be flagged or otherwise clearly marked. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer will be increased such that activities are far enough from the nest so that the bird(s) no longer display this agitated behavior. Construction shall only occur within the 656-foot buffer zone during the breeding season if the Designated Biologist monitors the nest and determines that the activities do not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved off site. Any modifications to this buffer shall be approved by CDFW prior to its implementation. The buffer reduction request shall include relevant information and/or propose new measures to justify the buffer reduction. The buffer area must be clearly marked to prevent Project-related activities from occurring within the buffer zone.

A2-4
cont.

3. Passive Exclusion of Burrowing Owls. If after all applicable avoidance and minimization measures are implemented, Permittee needs to passively exclude burrowing owls, a burrowing owl exclusion plan shall be developed by the Designated Biologist for CDFW review and approval. This plan, including its proposed mitigation, shall be consistent with the most recent available guidelines (e.g., *2012 Staff Report on Burrowing Owl Mitigation*). This plan shall be submitted to CDFW at least thirty (30) days prior to its implementation. Burrow exclusion shall only be conducted during the non-breeding season for burrows located in the Project footprint, and in limited instances within a buffer zone around the Project site, as determined in consultation with CDFW after all avoidance and minimization measures have been exhausted.”

Comment 3: Mitigation Measure 3.3-1b Swainson’s Hawk and Other Nesting Birds, pages 3.3-19 and 3.3-20

The DEIR combined avoidance and minimization measures for both non-listed migratory birds and raptors as well as the state listed Swainson’s hawk. CDFW recommends different measures for migratory birds and raptors versus SWHA.

To address this comment, CDFW recommends the DEIR describe how the considerations identified below will be implemented and incorporated into the appropriate DEIR section(s):

A2-5

1. CDFW recommends Project proponent add specific avoidance and minimization measures to the Mitigation Measures section. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, visual barriers, and buffers, where appropriate. The DEIR should also include appropriate preconstruction surveys for non-listed migratory birds at a minimum radius of 500-feet (for migratory birds) and 1/2-mile (for raptors) around the Project area that can be accessed by Project

proponent. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. One example is nest buffer radius which can be determined by monitoring the active nests and determining the distance that activities will disturb the nesting birds. CDFW recommends all measures to protect non-listed nesting birds should be performance-based. While some birds may tolerate disturbance within 500 feet of construction activities, other birds may have a different disturbance threshold and “take” could occur if the temporary disturbance buffers are not designed to reduce stress to that individual pair. CDFW recommends including performance-based protection measures for avoiding all nests protected under the Migratory Bird Treaty Act and Fish & G. Code. A 500-foot exclusion buffer may be sufficient; however, that buffer may need to be increased based on the birds’ tolerance level to the disturbance. It is the Project proponent’s responsibility to confirm the buffer is sufficient to avoid take/nest failure. CDFW recommends a final preconstruction survey be required no more than seven (7) calendar days prior to the start of vegetation clearing or ground disturbance activities, as instances of nesting could be missed in earlier surveys. Monitoring of potential nesting activities in the Project area should continue, at a minimum, until the end of the avian nesting season (September 1). If a lapse in Project-related work of seven (7) calendar days or longer occurs, the qualified biologist shall complete another focused survey before Project work can be reinitiated. It is the Project proponent’s responsibility to comply with Fish and Game Code Sections 3503, 3503.5, and 3513, regardless of the time of year.

2. CDFW recommends a qualified biologist conduct a SWHA survey within a minimum 1/2-mile radius around the Project area that is accessible to the Project proponent. Surveys should be conducted according to the following the five-period schedule in accordance with the “Recommended Timing and Methodology for Swainson’s Hawk Nesting Surveys in California’s Central Valley (Swainson’s Hawk Tech. Advis. Comm., 5/2000)”:

- January to March 20- One (1) Survey, All Day
- March 20 to April 5- Three (3) Surveys, Sunrise to 1000 / 1600 to Sunset
- April 5 to April 20- Three (3) Surveys, Sunrise to 1200 / 1630 to Sunset
- April 21 to June 10- Monitoring
- June 10 to July 30- Three (3) Surveys, Sunrise to 1200 / 1600 to Sunset

If an occupied nest is found, the Project proponent should consult with CDFW and demonstrate compliance with CESA. CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the CESA. CDFW recommends an ITP include SWHA if the Project has the potential to result in “take” (Fish & G. Code § 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of the CESA-listed species, either through construction or over the life of the Project.

3. CDFW recommends that any removal of known raptor nest trees, even outside of the nesting season, be replaced with an appropriate native tree species planting at a ratio of 3:1 at or near the Project area or in another area that will be protected in perpetuity to reduce impacts resulting from the loss of nesting habitat. CDFW recommends compensation for the loss of SWHA foraging habitat to reduce impacts to SWHA foraging habitat to less than significant based at a ratio of no less than 1 acre of mitigation for every acre impacted, consistent with the City of Elk Grove Swainson’s Hawk Ordinance, which also recommends that mitigation for habitat loss occur within a minimum distance of 10 miles from known nest sites and the amount of habitat

A2-5
cont.

compensation is dependent on nest proximity. In addition to fee title acquisition or conservation easement recorded on property with suitable grassland habitat features, mitigation may occur by the purchase of conservation or suitable agricultural easements. Suitable agricultural easements would include areas limited to production of crops such as alfalfa, dry land and irrigated pasture, and cereal grain crops. Vineyards, orchards, cotton fields, and other dense vegetation do not provide adequate foraging habitat.

A2-5
cont.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

A2-6

CONCLUSION

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEOA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the DEIR for the New Zoo at Elk Grove Project to assist the City of Elk Grove in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this email or further coordination should be directed to Harvey Tran, Senior Environmental Scientist (Specialist) at (916) 358-4035 or harvey.tran@wildlife.ca.gov.

Thank you.

Harvey Tran

Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife

Region 2 - North Central Region
Habitat Conservation Program
(916) 358-4035

LETTER A2 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Harvey Tran, Senior Environmental Scientist
February 20, 2024

- A2-1 The commenter states that the California Department of Fish and Wildlife (CDFW) is Trustee Agency for fish and wildlife resources and may also be a responsible agency under CEQA.
- As stated on page 1-2 of the Draft EIR, "The only trustee agency that has jurisdiction over resources potentially affected by the Project is the California Department of Fish and Wildlife." The comment does not address the adequacy of the EIR analysis, and no further response is required.
- A2-2 The commenter provides a summary of the Project description.
- The comment does not address the adequacy of the EIR analysis, and no further response is required. The comment is noted.
- A2-3 The commenter states that the Draft EIR does not identify Project activities that would impact resources under Fish and Game Code Section 1602 construction of outfalls to convey stormwater from the Project site to Shed C channel that could obstruct the natural flow of the stream, impact material from the bed, channel, or bank, and/or fill entering the tributaries. The commenter recommends including outfall installation activities at the Shed C channel in the Project's notification for a Streambed Alteration Agreement and that the Draft EIR be modified to clarify what Project activities would impact resources under Fish and Game Code Section 1602.
- As described on page 3.3-14 of the Draft EIR, improvements to the Shed C watershed would provide for flood control, stormwater quality treatment, and mitigation for changes in hydrology as the Southeast Plan Area, including the Project site, were already approved and are currently under construction to the north of the Project. These permits and approvals were secured under a separate project. Therefore, the Project would not have new impacts to the Shed C channel that have not been approved under the previously secured agreements. However, the City will include the outfall installation activities for Shed C Channel in its Project notification of Lake and Streambed Alteration.
- A2-4 The commenter states that the 150-foot protective buffer for a nonbreeding burrowing owl burrow described under Mitigation Measure 3.3-1a of the Draft EIR differs from the buffer distance recommended in the Staff Report on Burrowing Owl Mitigation (CDFG 2012), which is a minimum of 50 meters (164 feet) and a maximum of 500 meters (1,640 feet) depending on the expected level of disturbance. The commenter recommends modifying the Draft EIR mitigation measure to match the buffer recommendations for breeding and nonbreeding seasons provided in the Staff Report and include language to allow for passive relocation as a last resort during the nonbreeding season if necessary.
- In response to this comment, the language of Mitigation Measure 3.3-1a on page 3.3-18 in Section 3.3, "Biological Resources," has been amended. These edits are minor and do not constitute "significant new information" that would require recirculation of the Draft EIR under State CEQA Guidelines Section 15088.5.
- Mitigation Measure 3.3-1a has been revised as follows:
- Mitigation Measure 3.3-1a: Conduct Take Avoidance Survey for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows**
- The New Zoo shall implement the following measures to reduce impacts on burrowing owl:
- ▶ A qualified biologist shall conduct focused breeding and nonbreeding season surveys for burrowing owls in areas of suitable habitat on and within 500 feet of the Project site. To ensure accuracy and the most up-to-date information, surveys shall be conducted before the start of construction activities and in accordance with Appendix D of the Staff Report on

Burrowing Owl Mitigation (CDFG 2012), which recommends at least three surveys conducted at least 3 weeks apart.

- ▶ If no occupied burrows are found, the qualified biologist shall submit a report documenting the survey methods and results to the City, and no further mitigation shall be required.
- ▶ If an active burrow is found during the nonbreeding season (September 1 through January 31), the applicant shall consult with CDFW regarding protective buffers to be established around the occupied burrow and maintained throughout construction. The buffer shall be a minimum of ~~450~~ 164 feet around the active, nonbreeding burrow but may be reduced in consultation with CDFW. The protective buffer zone shall be clearly marked with flagging or other highly visible materials. If after all applicable avoidance and minimization measures are implemented, it is determined that occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, passive relocation will be allowed as a last resort in consultation with CDFW. The burrowing owl exclusion plan shall be developed, as described in Appendix E of the Staff Report. Burrowing owls shall not be excluded from occupied burrows until the Project burrowing owl exclusion plan is approved by CDFW and only during the nonbreeding season. The exclusion plan shall include methods for determining burrow vacancy, type and timing for scoping burrows, what will determine excavation timing, a monitoring plan for determining exclusion has been successful, remedial measures to prevent owl reuse and avoid take, and a burrowing owl mitigation and management plan (see below).
- ▶ If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows shall not be disturbed and shall be provided with a protective buffer at a minimum of 650 feet unless a qualified biologist verifies through noninvasive means that either (1) the birds have not begun egg laying or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer may be adjusted depending on the time of year and level of disturbance as outlined in the Staff Report (CDFG 2012: 9). The size of the buffer may be reduced if a broad-scale, long-term monitoring program acceptable to CDFW is implemented so that burrowing owls are not adversely affected. After the fledglings are capable of independent survival, the owls can be evicted, and the burrow can be destroyed in accordance with the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of the Staff Report.
- ▶ If burrowing owls are excluded from burrows and the burrows are destroyed as a result of Project construction activities, the applicant shall mitigate the loss of occupied habitat such that habitat acreage and the number of burrows are replaced through permanent conservation of comparable or better habitat at a 1:1 mitigation ratio with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. The applicant shall retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards, among others:
 - Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat; disturbance levels; potential for conflicts with humans, pets, and other wildlife; density of burrowing owls; and relative importance of the habitat to the species throughout its range.
 - Where available, mitigation lands shall be provided adjacent or proximate to the development area so that displaced owls can relocate with reduced risk of injury or mortality, depending on the availability of habitat sufficient to support displaced owls that may be preserved in perpetuity.

- ▶ If habitat suitable for burrowing owl is not available for conservation adjacent or proximate to the development area, mitigation lands shall be secured off-site and shall aim to consolidate and enlarge conservation areas outside of planned development areas and within foraging distance of other conservation lands. Alternatively, mitigation may be accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. Alternative mitigation sites and acreages may also be determined in consultation with CDFW. If burrowing owl habitat mitigation is completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and whether the numbers are maintained over time. Measures of success, as suggested in the Staff Report, shall include site tenacity, the number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

A2-5

The commenter recommends providing different mitigation measures for state listed Swainson's hawk under Mitigation Measure 3.3-1b from mitigation measures for non-listed migratory birds and raptors. The comment recommends specific mitigation language.

In response to this comment, the language of Mitigation Measure 3.3-1b on pages 3.3-19 and 3.3-20 in Section 3.3, "Biological Resources," of the Draft EIR has been amended to include specific mitigation language recommended by CDFW. These edits are minor and do not constitute "significant new information" that would require recirculation of the Draft EIR under State CEQA Guidelines Section 15088.5.

Mitigation Measure 3.3-1b has been updated as follows:

Mitigation Measure 3.3-1b: Conduct Focused Surveys for Swainson's Hawk, White-Tailed Kite, Northern Harrier, Tricolored Blackbird, Loggerhead Shrike, and Other Nesting Birds

The Project applicant shall implement the following measures to reduce impacts on special-status and other tree-nesting birds:

- ▶ To minimize the potential for loss of nesting birds protected under the Migratory Bird Treaty Act or California Fish and Game Code Section 3503, Project construction activities (e.g., tree removal, vegetation clearing, ground disturbance, staging) shall be conducted during the nonbreeding season (approximately September 1 through January 31, as determined by a qualified biologist), when possible. If Project construction activities are conducted during the nonbreeding season, no further mitigation shall be required.
- ▶ Within 14 days before the onset of Project construction activities during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with birds of California and with experience conducting nesting bird surveys shall conduct focused surveys for ~~Swainson's hawk~~, white-tailed kite, tricolored blackbird, northern harrier, loggerhead shrike, and other nesting birds protected under the Migratory Bird Treaty Act or California Fish and Game Code Section 3503. Surveys shall be conducted in accessible areas (i.e., not including private property) ~~within 1,000-foot buffer of the Project site for Swainson's hawk and white-tailed kite~~, within 500 feet of the Project site for nonraptor native bird nests and within 0.5-mile for raptor nests.
- ▶ Surveys for Swainson's hawk shall be conducted within a 0.5-mile radius of the Project site in areas accessible to Project biologists. Surveys shall be conducted according to *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (SHTAC 2000), which includes the following five-period schedule:

- January to March 20: One all-day survey
 - March 20 to April 5: Three surveys, sunrise to 10:00/16:00 to sunset
 - April 5 to April 20: Three surveys, sunrise to 12:00/16:30 to sunset
 - April 21 to June 10: Monitoring
 - June 10 to July 30: Three surveys, sunrise to 12:00/16:00 to sunset
- ▶ If an active Swainson's hawk nest is found during surveys, the City shall consult with CDFW to demonstrate compliance with CESA and determine appropriate no-disturbance buffers around active nests to avoid take. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist. No Project activity shall commence in the buffer areas until a qualified biologist has determined, in consultation with CDFW, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. CDFW guidelines recommend implementation of 0.5-mile-wide buffer for Swainson's hawk.
- ▶ If no nests are found, the qualified biologist shall submit a report documenting the survey methods and results to the City, and no further mitigation shall be required.
- ▶ For Project activities that begin between March 1 and September 15, the qualified biologists shall conduct additional preconstruction surveys for nesting raptors and birds no more than ~~40~~ 7 days before implementation of Project activities to identify active nests on and within a ~~1,000~~ 500-foot buffer of the Project site. ~~The~~ If a lapse in Project work of 7 days or longer occurs, the qualified biologist shall conduct another focused survey for nesting birds before work can resume ~~surveys shall be conducted within 14 days before the beginning of any construction activities between March 1 and September 15.~~
- ▶ Impacts on ~~nesting Swainson's hawk,~~ white-tailed kite, and other raptors shall be avoided by establishing appropriate buffers around active nest sites identified during preconstruction raptor surveys. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist. No Project activity shall commence in the buffer areas until a qualified biologist has determined, in consultation with CDFW, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. CDFW guidelines recommend implementation of ~~0.5-mile-wide buffer for Swainson's hawk and~~ 500-foot-wide buffers for other raptors, other than Swainson's hawk, but the size of the buffer may be adjusted if a qualified biologist, in consultation with CDFW, determines that such an adjustment would not be likely to adversely affect the nest. The appropriate no-disturbance buffer for other nesting birds (i.e., species other than Swainson's hawk and burrowing owl) shall be determined by a qualified biologist based on site-specific conditions, the species of nesting bird, the nature of the Project activity, visibility of the disturbance from the nest site, and other relevant circumstances.
- ▶ Monitoring of all active nests by a qualified biologist during construction activities shall be required ~~if the~~ for any activity that has potential to adversely affect the nest. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined appropriate by a qualified biologist to avoid adverse effects on the nest(s). Monitoring of potential nesting activities in the Project area shall continue, at a minimum, until the end of the avian nesting season (September 1).

- ▶ Trees containing white-tailed kite or other raptor (excluding Swainson’s hawk) nests that must be removed as a result of Project implementation shall be removed during the non-breeding season (September 1–January 1) unless otherwise authorized by CDFW. No trees supporting active Swainson’s hawk nests shall be removed without seeking an incidental take permit from CDFW.
- ▶ If any active raptor nest trees discovered during nesting bird surveys would be removed by Project activities, the City of Elk Grove shall replace the lost trees with locally appropriate native tree plantings at a ratio of 3 to 1 at or near the Project area or in another area that will be protected in perpetuity.

The commenter further recommends compensation for the loss of Swainson’s hawk foraging habitat at a ratio no less than 1 acre of mitigation for every acre lost, consistent with the City of Elk Grove Swainson’s Hawk ordinance. The commenter also recommends foraging habitat migration occur within a minimum distance of 10 miles from the known nest sites and that the compensation ratio be based on nest proximity to the Project site.

As described in Mitigation Measure 3.3-1c on page 3.3-20 of the Draft EIR, the Project applicant will be required to mitigate the loss of Swainson’s hawk foraging habitat consistent with the ratios provided in Chapter 16.130, Swainson’s Hawk Mitigation Fees of the Elk Grove Municipal Code (i.e., the City of Elk Grove Swainson’s Hawk ordinance), for each acre developed at the Project site. Mitigation Measure 3.3-1c further specifies that the Project applicant shall implement conservation easement standards provided in Chapter 16.130. The commentor states that Chapter 16.130 specifies that foraging habitat mitigation should occur within 10 miles from known nest sites. However, evaluation of eligible mitigation sites for Swainson’s hawk is conducted pursuant to the provisions of Elk Grove Municipal Code Section 16.13.110 and in consultation with CDFW pursuant to Elk Grove Municipal Code Section 16.130.040. The City has previously approved, and the Courts have validated, the use of Swainson’s hawk mitigation that is more than 10 miles from the project site. (See *Environmental Council of Sacramento v. City of Elk Grove*, 2021 WL 3854906 [Unpub, 2021]). This broader mitigation area is appropriate, in part, because Swainson’s hawk are known to forage up to 20 miles from active nest sites, and migrate thousands of miles each year for overwintering in South America. Therefore, no changes have been made to Mitigation Measure 3.3-1c in response to this comment.

A2-6

The commenter states that any special-status species information in CEQA documents should be reported to the California Natural Diversity Database and that projects that could have an impact on fish and wildlife species need to pay a filing fee.

The comment does not address the adequacy of the EIR analysis, and no further response is required. The comment is noted.

Letter
A3



February 20, 2024

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

Comments Submitted Via Email

Subject: Notice of Environmental Impact Report for The New Zoo at Elk Grove
SCH# 2022110393
Sac Metro Air District# SAC202303098

Dear Christopher Jordan,

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) the opportunity to review the Notice of Environmental Impact Report for The New Zoo at Elk Grove (DEIR). The Project would result in the operation of a zoological park and associated support and operational, retail, and guest services facilities on the Project site as part of the development of the New Zoo in Elk Grove. The Project would include a new Special Planning Area (SPA) called the Zoological Park SPA, zoo development, parking facilities, off-site public infrastructure improvements, and an animal browse program.

A3-1

The California Health and Safety Code requires the Sac Metro Air District to represent the residents of Sacramento County in influencing the decisions of other agencies whose actions may have an adverse impact on air quality. Sac Metro Air District staff are pleased to provide the following comments in that spirit.

A3-2

Comments on the DEIR:

Facility Electrification

The Sac Metro Air District supports the project plans for all-electric operations with on-site EV generation.

A3-3

777 12th Street, Ste. 300 • Sacramento, CA 95814
 Tel: 279-207-1122 • Toll Free: 800-880-9025
 AirQuality.org

Appendix H Traffic VMT Memorandum

The key findings from the Traffic Study¹ discuss a proposed multi-use pathway along Classical Way and other improvements from the *Kammer Road Urban Design Strategies Report*² as potential future facilities that may enhance bicycle and pedestrian access to the proposed facility. We recommend the final plan include a commitment to install the supportive infrastructure concurrent with the timing of the project opening.

A3-4

Greenhouse Gas Emissions and Climate Change- Impact 3.5-1

As noted in *Impact 3.7-1: Project-generated GHG emissions and consistency with plans and regulations*³, District Staff note that the Project as proposed would not meet the Tier 1 BMP 2 standards of the EV requirements of the CalGreen Code. Per CalGreen Code requirements, the Project would be required to implement Mitigation Measure 3.7-1. Implementing Mitigation Measure 3.7-1 would require EV capable and EVSE spaces to be installed consistent with the tier 2 requirements of the CalGreen Code. As described in the DEIR, to meet the most recent 2022 CalGreen Code tier 2 requirements for EV charging spaces, the Project would need to construct 729 EV-capable parking spaces (i.e., 45 percent of the Project’s total parking spaces) and 240 EVSE spaces (i.e., EV spaces supportive Level 2 or Direct Current Fast Chargers; 33 percent of the total EV capable spaces).

A3-5

District staff recommends that the final design comply with the Current Calgreen Code requirements; if this is infeasible, we recommend that the final design include infrastructure sufficient to allow for future electrification of non-compliant parking facilities.

Comments on Zoo Design:

Urban Heat Island Effect

The urban heat island effect is already a significant challenge for the Sacramento Region – one that will be further exacerbated by increasing extreme heat because of climate change. According to the Capital Region Transportation Sector Urban Heat Island Mitigation Project⁴, because of the urban heat island effect, urbanized areas in Sacramento are already some 3 to 9 degrees Fahrenheit warmer than their surrounding areas. Higher ambient temperatures increase the formation of ozone, a respiratory system irritant. During extreme heat and extended heat waves, higher temperatures can also lead to heat stress, heat stroke, and heat mortality, with greater vulnerabilities for the elderly, the young, outdoor workers, pregnant women, and those with pre-existing health conditions. The urban heat island results from the conversion of undeveloped land to urbanized land but can be mitigated by using cool or reflective materials for the built environment.

A3-6

¹City of Elk Grove, New Zoo Project Draft; *Appendix H Traffic Study Key Findings*. Page iii.

² Kammerer Road Urban Design Strategies, January 2021, City of Elk Grove.

<https://www.elkgrovecity.org/sites/default/files/city-files/Departments/SP1/KammererUDS/210105%20Kammerer%20Road%20Urban%20Design%20Strategies.pdf>

³City of Elk Grove, New Zoo Project Draft EIR; *Impact 3.7-1: Project-generated GHG emissions and consistency with plans and regulations*. Page 3.7-10

⁴ Capital Region Urban Heat Island Mitigation Project: <https://urbanheat-smaqmd.hub.arcgis.com/>

We recommend that the final design include the following design policies as commitments for implementation, as informed by UHI Project findings, to help mitigate contributions to the urban heat island effect.

A3-6 cont.

Policy: All new roofs will utilize cool roofs to reduce the urban heat island effect and reduce building energy consumption.

A3-7

- New roofs and roof replacements (over project operation) will meet the current California Energy Commission’s standards for cool roofs.

Policy: The parking lot shade ordinance will be enhanced, requiring immediate cooling measures to be installed should the tree shade fail to meet standards.

A3-8

- Cool pavement surface applications are required in areas that are non-compliant with tree shading standards until compliant.
- Cool pavement surface applications are required for maintenance activities that reduce tree shade coverage over paved areas.

Policy: New paved areas will incorporate tree canopy and/or cool paving materials and other means to ensure shading and heat island reduction.

A3-9

- For paved areas 1 acre or larger with planned tree canopy or other shading, or unshaded paved areas 0.5 acres or greater: All new pavements, including sidewalks, pedestrian paths, parking lots, and plazas, have a Solar Reflective Index (SRI) of 29 or greater.

Policy: All new pavements, including sidewalks, roads, bike lanes, pedestrian paths, parking lots, plazas, and roadways, have a Solar Reflective Index (SRI) of 29 or greater.

A3-10

- This policy would also implement Policy ER-6-4 of the current General Plan, which includes goals to provide cool pavements and higher-albedo pervious materials and trees and foliage along public rights-of-way.
- This strategy aligns with the Current General Plan Implementation Strategy Action 13.2, “Public Works Standards.”

Policy: New public sidewalks and outdoor public spaces provide continuous tree shading to the full extent feasible, in addition to meeting the City’s commendable parking lot tree shade requirements.

A3-11

Communication

Thank you for the consideration of these comments. If you have questions, contact JJ Hurley at jjhurley@airquality.org or (279) 207-1130.

Sincerely,

-JJ Hurley

cc: Paul Philley
Program Supervisor, CEQA & Land Use

LETTER A3 SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

JJ Hurley
February 20, 2024

- A3-1 The comment is introductory in nature.
The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
- A3-2 The commenter describes the purpose of the Air District's comments and is introductory in nature.
The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
- A3-3 This commenter states the support from the Air District on a fully electric Project and on-site EV generation.
The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
- A3-4 The commenter recommends the final plan for the New Zoo to commit to installing supportive bicycle and pedestrian infrastructure concurrent with Project opening.
As stated on page 3.13-15 of the Draft EIR in Section 3.13, "Transportation," the Project would include various pedestrian and bicycle facilities. These facilities include pedestrian paths to facilitate internal circulation on the Project site, off-site pedestrian improvements, and a new Class I bicycle and pedestrian trail along the west side of Lotz Parkway. As indicated in Table 2-1 of the Draft EIR, these off-site improvements would be constructed as part of Phase 1A: Near Term part of the Project. The Project also proposes approximately 120 guest-serving bicycle parking spaces, in addition to employee bike-parking spaces.
- A3-5 The commenter states the need to increase EV-capable and EVSE spaces to adhere to the most recent 2022 CalGreen Code tier 2 requirements pursuant to the direction provide by the Sacramento Metropolitan Air Quality Management District (SMAQMD), comprising 739 EV-capable parking spaces (45 percent of Project's total 1,600 spaces) and 240 EVSE spaces (33 percent of the 729 EV-capable parking spaces).
Mitigation Measure 3.7-1 on page 3.7-13 of the Draft EIR states that the New Zoo will equip 45 percent of the Project's total parking spaces with EV capable infrastructure and 33 of those capable spaces will support EVSE infrastructure. The total number of EV capable parking spaces will be determined once the parking count for the New Zoo is finalized.
- A3-6 The commenter states the challenge of the urban heat effect in the Sacramento region. The commenter further describes the urban heat island affects in Sacramento and that it is possible to mitigate these effects.
Chapter 23.54 of the City of Elk Grove Municipal Code requires landscaping to be provided for all development types in parking lots. Section 23.54.040.K requires parking lots with over 50 spaces have a minimum of 50 percent of the spaces to be shaded. The Project would comply with this shade standard and over 50 percent of the parking lot is proposed to be shaded. Within the zoological park areas surrounding the walkways would be shaded and the habitats would consist primarily of a mixture of native and nonnative perennial grasses and forbs. Vegetation around the Project site would reduce the impact of the urban heat island effect. No changes to the EIR are required in response to this comment.
- A3-7 The commenter offers a policy to mitigate the urban heat effect by installing cool roofs that meet the California Energy Commission's standards.

- The Project would be designed to be consistent with Part 6 of the 2022 Title 24 California Building Energy Code. Part 6 requires installation of cool roofs, which would be implemented by the Project. No changes to the EIR are required in response to this comment.
- A3-8 The commenter provides a policy to mitigate the urban heat effect by installing cooling measures to the parking lot in case tree shade fails to meet standards.
- Chapter 23.54 of the City of Elk Grove Municipal Code requires landscaping to be provided for all development types in parking lots. Section 23.54.040.K requires parking lots with over 50 spaces have a minimum of 50 percent of the spaces to be shaded. The Project would comply with this shade standard and over 50 percent of the parking lot would be shaded. Additionally, as stated in Section 2.4.5 of the Project Description of the Draft EIR the New Zoo would include landscaping and trees along the exterior of the site, in the main parking lot, and throughout other areas of the zoological park. No changes to the EIR are required in response to this comment.
- A3-9 The commenter provides a policy to mitigate the urban heat effect by installing tree canopy or cool paving materials to ensure all paved areas have a Solar Reflective Index (SRI) is 29 or greater.
- The City of Elk Grove does not have a policy that requires an SRI of 29 or greater. However, the Project would implement tree canopies and cool paving materials to the extent possible to mitigate effects of the urban heat effect. Please see Response A3-8 related to Project landscaping. No changes to the EIR are required in response to this comment.
- A3-10 The commenter provides a policy to mitigate the urban heat effect by ensuring that all new pavements have an SRI of 29 or greater by providing cool pavements, higher-albedo pervious material, and trees and foliage along public right-of-way.
- Please refer to Response A3-9. No changes to the EIR are required in response to this comment.
- A3-11 The commenter provides a policy to mitigate the urban heat effect by ensuring all new public sidewalks and outdoor public spaces provide continuous tree shading to the maximum extent to meet the City's recommended parking lot tree shade requirements.
- As part of the design, the Project would include landscaping along the fence line with trees for shading, as described in Draft EIR Section 2.4.5. Concrete would be used as feasible for paved areas of the New Zoo; however, some areas would be required to use asphalt for compliance with water and wastewater utility provider standards for pavement placed atop their services. Because the Project, by design, would include landscaping requirements to minimize the heat generated by the urban heat island effect, the Project would comply with this recommendation. No changes to the EIR are required in response to this comment.



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Public Transit Since 1973

Letter
A4

February 20, 2024

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

SUBJECT: Draft Environmental Impact Report for the New Zoo Project

The Sacramento Regional Transit District (SacRT) values the opportunity to review and provide input on the City of Elk Grove's (City) Draft Environmental Impact Report (DEIR) for the New Zoo Project (Project). SacRT appreciates that the City recognizes transit and accessibility as a primary objective. Considerations about transit and supporting future transit service and transit infrastructure will be an important piece to addressing some of the areas of controversy that are associated with the Project, specifically pertaining to emissions from zoo operations and transportation to the New Zoo, and transportation impacts from visitation to the New Zoo. Ensuring that transportation expansion and supportiveness is incorporated into the Project's planning process will be key to help address some of the significant and unavoidable impacts and attempt to mitigate them as much as possible.

A4-1

As the region's largest transit service provider, SacRT plays an important role in serving the region; therefore, it is crucial that our planning efforts and projects are in line with the guiding principles that emphasize making land use and transportation decisions. As such, SacRT staff has reviewed the City's DEIR for the New Zoo Project, and offer the following support, thoughts, and suggestions.

Chapter 2- Project Description

The 'Project Summary' table indicates two planned parking lots: a North lot with 500 spaces and a South lot with 700 spaces, though *Section 2.4.6 Parking Facilities* states "between 1,600 and 1,700 parking stalls would be constructed in the two lots." Staff would like to confirm the accurate number of planned parking spaces, as the latter reference is alarmingly high from a transit agency perspective. We understand that a project of this capacity requires adequate parking; however, an abundance of parking spaces, such as 1,600 to 1,700, would not be transit supportive.

A4-2

In *Section 2.4.7 Off-Site Infrastructure Improvements*, there is no mention of 'Transit Facilities' included with '*Pedestrian and Bicycle Facilities*'. To better support transit and accessibility as a primary objective for the Project, staff recommend including language about existing and future transit opportunities, including the construction of bus stops and bus turnouts, as they will be required to provide bus service to the Project.

A4-3

Chapter 3.7- Greenhouse Gas Emissions and Climate Change

Impact 3.7-1: Project-generated GHG emissions and consistency with plans and regulations - Construction of the project would not exceed SMAQMD's threshold of significance for construction-related climate change impacts; however, at full buildout, Project emissions would be above SMAQMD's bright-line threshold of significance, requiring the following mitigation measures to reduce mobile emissions:

A4-4

Mitigation Measure 3.7-1a: Install EV Capable and EVSE Spaces Consistent with the Tier 2 Requirements of the 2022 CalGreen Code

Mitigation Measure 3.7-1b: Implement Mitigation Measure 3.13-2a: Subsidize Transit for New Zoo Employees –

SacRT has determined that the provision of free transit is an extremely effective method for increasing transit use. As such, SacRT is open to collaborate on developing an employee subsidy program based on the number of employees at the Project's opening phase and at full buildout.



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Mitigation Measure 3.7-1bc: Implement Mitigation Measure 3.13-2b: Provide a Local Transit Stop – Staff request follow-up discussion with the City to determine a location for a new transit stop to be constructed prior to the Project’s opening phase.

A4-4
cont.

While staff supports these mitigation measures and looks forward to collaborating on implementing them, we are concerned that operational emissions would remain significant and conflict with the long-term goal of achieving carbon neutrality by 2045 as mandated by AB 1279, making this impact significant and unavoidable. SacRT staff request meetings with the City on any additional transit-related efforts that could potentially help achieve a less-than-significant impact.

Chapter 3.13- Transportation

Impact 3.13-2: Result in an Exceedance of City of Elk Grove General Plan VMT Thresholds -
At full buildout, the Project would result in an estimated net increase of daily VMT when compared to VMT from the existing Sacramento Zoo in Land Park, resulting in a significant impact as it could conflict with the Citywide cumulative limit under the General Plan Policy. As such, the following mitigation measures are being proposed:

Mitigation Measure 3.13-2a: Subsidize Transit for New Zoo Employees -
See comment for *Mitigation Measure 3.7-1b*.

Mitigation Measure 3.13-2b: Provide Local Transit Stop -
See comment for *Mitigation Measure 3.7-1bc*.

A4-5

While staff supports these mitigation measures and looks forward to collaborating on implementing them, we are concerned that implementation of these measures would not guarantee that they would result in bringing the Project-generated daily VMT to existing levels, making this impact significant and unavoidable.

Table 3.13-4 lists VMT Reduction Measures, and several have been identified as ‘feasible/applicable to the Project’; however, there are other measures that have not been identified as ‘feasible/applicable to the Project’ that could potentially be explored, specifically the following:

- T-25: Extend Transit Network Coverage Hours
- T-26: Increase Transit Service Frequency
- T-28: Provide Bus Rapid Transit

While the City “does not have jurisdiction over the operation of transit service” SacRT staff would like to extend a request to meet with the City and study the feasibility of these measures in more depth. The Project site is not currently served by transit; therefore, new fixed-route operations would be required and would not be plausible without ongoing funding.

Impact 3.13-3: Substantially Increase Hazards Due to a Geometric Design Feature or Incompatible Uses -

With the construction and operation of a zoological park, the Project would be subject to, and constructed in accordance with, applicable roadway design and safety guidelines. Because the Project could increase safety hazards related to increased queueing and vehicular activity during the Project’s opening month, the following mitigation measure is proposed:

A4-6

Mitigation Measure 3.13-3: Prepare and Implement Traffic Management Plan (TMP) for the Opening Month and Special Events -

Staff would like to request a review of the TMP, and suggests the plan extends beyond opening day and special events, based on expected volumes. Fixed-route buses will be faced with the same roadway and traffic challenges; therefore, a review of this plan will be necessary to prepare for efficient transit service. Additionally, staff suggest the TMP also consider funding opportunities to prepare for and support the transit operations determined to serve the Project area.



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sacrt.com

Public Transit Since 1973

Chapter 4- Cumulative Impacts

Table 4-2: Related Projects include many residential and commercial development projects, as well as a public works project (Kammerer Road Extension Project) that will potentially contribute to the cumulative condition of the Project. Staff recommend adding a "BRT/LRT Extension Project" to the table, which is a conceptual plan being developed in partnership with SacRT and the City of Elk Grove to study the extension of high-frequency transit service to the Big Horn Road/Kammerer Road area. Although the plan will be conceptual, it will likely include the Project as a consideration in some capacity; therefore, staff believe it should be added to *Table 4-2* for consistency as a "Pending" status project.

A4-7

Impact 4-12: Contribute to Cumulative Impacts Related to Greenhouse Gas Emissions and Climate Change, and Impact 4-22: Contribute to Cumulative Impacts on Vehicle Miles Traveled- SacRT staff understands that GHG impacts relative to global climate change are inherently cumulative, and the VMT generated by the Project is cumulatively considerable; however, if there is a way to improve the cumulative impact with mitigation planning and monitoring, then local transit agency involvement will be critical due to the size and the public intent of the Project.

A4-8

In conclusion, SacRT staff feels that there is no feasible mitigation available to reduce these impacts to a less-than-significant level without studying the feasibility of transit expansion and funding. The existing transit service in the City is limited and based on a fixed operating budget that does not even allow weekend service on most Elk Grove routes. The southern region of the City, near the Project site, lacks transit service altogether. The ability to implement transit service to the Project site will require funding, infrastructure, and strong partnerships to attempt to mitigate specific impacts described in the DEIR.

Thank you again for the opportunity to review and provide comments on the Draft Environmental Impact Report for the New Zoo Project. Please feel free to contact me at spoe@sacrt.com with any questions or to follow up on any of the comments provided. SacRT values the partnership with the City of Elk Grove and looks forward to continued collaboration and exploring ways to make the New Zoo Project a destination the City, and the region can be proud of.

Sincerely,

Sarah Poe

Sarah Poe
Planner, SacRT

- cc. Kevin Alvarez, Planning Intern, SacRT
- Kevin Schroder, Senior Planner, SacRT
- Anthony Adams, Director of Planning, SacRT

LETTER A4 SACRAMENTO REGIONAL TRANSIT DISTRICT

Sarah Poe, Planner
February 20, 2024

A4-1 The commenter states that transit and transit infrastructure will be important for the New Zoo, especially as it relates to reducing emissions and transportation impacts. The commenter continues to provide information about Sacramento Regional Transit District (SacRT).

As stated on page 2-1 of the Draft EIR one of the objectives of the Project is to “increase access to the zoo with adequate parking facilities, easy accessibility, and access to transit and trails.” The Draft EIR analyzes the potential effects from transit reducing greenhouse gas emissions and vehicle miles traveled in Sections 3.7 “Greenhouse Gas Emissions” and 3.13 “Transportation.” Additionally, the Draft EIR includes Mitigation Measures 3.13-2a and 3.13-2b to subsidize transit for New Zoo employees and to provide a local transit stop for the Project.

A4-2 The commenter states that they would like to know the actual number of planned parking spaces for the Project as there is a discrepancy in the Project description and has concern regarding the number of proposed parking spaces.

As stated on page 2-19 of the Draft EIR the Project would support between 1,600 and 1,700 parking spaces. As described in detail below in Response to Comment I17-5, the number of parking spaces proposed on the site is based on the projected attendance at the New Zoo. The total number of parking spaces for the New Zoo was estimated based on maximum attendance. However, because the New Zoo would be a regional attraction seasonal variation is anticipated and it is likely that only the north parking lot would be needed during the off season. The exact number of parking spaces would be determined as part of the final design review for the Project. Table 2-1 from the Project Description has been revised as follows:

Table 2-1 Project Summary

Phase/Timing	Planning Area	Description	Proposed Facilities	Proposed Exhibits ¹
Phase 1A: Near Term (30 months)				
	2-1	<ul style="list-style-type: none"> ▶ Two guest parking lots – North Lot and South Lot ▶ On- and off-site employee parking 	<ul style="list-style-type: none"> ▶ Paved north lot: 500 spaces ▶ Gravel south lot: <u>1,100</u> 700 spaces 	NA

A4-3 The commenter states that there is no mention of transit facilities included in the Project description.

The Project description is intended to provide an explanation of features proposed by the Project. However, existing transit facilities and services around the Project site are described in Section 3.13.2 of the Draft EIR under “Transit System.” One or more transit stops would be developed for the New Zoo, at locations determined in coordination with SacRT, consistent with the standards of the City and SacRT. Additionally, the Project includes Mitigation Measure 3.13-2b to provide a local transit stop to support the New Zoo. In response to this comment page 2-40 of the Draft EIR has been revised to include transit information. These edits are minor and do not constitute “significant new information” that would require recirculation of the Draft EIR under State CEQA Guidelines Section 15088.5.

Page 2-40 of the Draft EIR has been revised as follows:

One or more of the pedestrian crossings at the intersection of Classical Way and the guest parking lot entrances may be grade separated. This improvement would require increasing the height of the finish grade of the roundabout approximately 14 feet to provide enough

vertical clearance for pedestrian and bicycle users. In addition to pedestrian improvements the Project would include one or more transit stops at locations to be determined in coordination with Sacramento Regional Transit District. Transit stops would be determined and developed consistent with City and Sacramento Regional Transit District standards.

A4-4 The commenter provides a summary of the greenhouse gas (GHG) impact findings and mitigation measures and states that they support the mitigation measures. The commenter continues that they would like to collaborate with the City on additional transit related efforts to further reduce GHG emissions.

The City will coordinate with SacRT as the Project progresses to determine the appropriate location for transit related facilities and for transit operations for the Project. This comment is noted. But as additional mitigation measures are not identified in the comment to reduce the operational GHG emissions below the significance level, no revisions are required to the Draft EIR and the GHG impacts will remain significant and unavoidable.

A4-5 The commenter provides a summary of the Project vehicle miles traveled (VMT) impact and mitigation measures. The commenter states that they support the mitigation measures and understands that additional mitigation, such as extending transit coverage, is outside of the City's jurisdiction. The commenter requests to meet with the City to discuss the feasibility of measures for the Project that are within SacRTs jurisdiction.

The City will coordinate with SacRT as the Project progresses to discuss the feasibility of extending transit routes and hours, increasing transit service frequency, and providing major transit facilities, such as light rail and bus rapid transit, to the site. Changes to transit services would depend on Project phasing because the site would need fewer routes in the early phases and additional transit as the Project is built out. Therefore, the City will meet with SacRT as the Project develops. This comment is noted. However, as there are no current approved plans or funding identified to implement the changes to existing transit routes and frequency, or addition of transit services to serve the Project area, and these actions require further coordination and approvals from SacRT. As the comment notes, the City does not have jurisdiction over the transit services, and these measures cannot be considered as feasible mitigation measures due to absence of any current concrete plans and approvals from SacRT. This comment is noted and no further revision is required for the EIR.

A4-6 The commenter summarizes Mitigation Measure 3.13-3 Prepare and Implement Traffic Management Plans (TMP) for Opening Month and Special Events and requests review of the TMP and suggests the plan extend beyond opening day and special events. The commenter states that the City consider funding opportunities to support transit operations in the Project area.

In response to this comment, the language of Mitigation Measure 3-13-3 on pages 33.13-23 has been amended to include SacRT as a review agency for the Traffic Management Plan. These edits are minor and do not constitute "significant new information" that would require recirculation of the Draft EIR under State CEQA Guidelines Section 15088.5. The City will meet with SacRT as the Project continues to develop and as phases are constructed to discuss the need and feasibility of transit services.

Mitigation Measure 3.13-3 on page 3.13-23 of the Draft EIR has been revised as follows:

Mitigation Measure 3.13-3: Prepare and Implement Traffic Management Plans for the Opening Month and Special Events

The New Zoo shall be responsible for preparing a traffic management plan (TMP) and providing it to the City for approval by the Public Works Director (or their designee) and SacRT for review and coordination, as applicable, before opening day/weekend or other special events occurring at the New Zoo that may result in queuing spillover. The TMP shall include specific interventions for traffic conditions associated with the New Zoo opening and any other special events determined to warrant a TMP. The New Zoo shall be responsible for implementing the

interventions to which the Public Works Director has agreed. All traffic controls shall be installed in accordance with the California Manual on Uniform Traffic Control Devices and applicable City regulations. At a minimum, the TMP shall include the following strategies:

- ▶ Flaggers shall be provided to control traffic when necessary or requested by the City in compliance with Section 6-13.06 of the City’s Standard Construction Specifications 2022 or latest equivalent (City of Elk Grove 2022b: 52).
- ▶ Changeable Message Signs shall display one or more alternating messages along likely patron access routes to broadcast up-to-date information regarding desired routing. The signs shall be in place no less than 72 hours before the date of the event or 5 business days in advance of a detour and shall remain in place for the duration of the event in compliance with Section 12-3.02 of the City’s Standard Construction Specifications 2022 or latest equivalent (City of Elk Grove 2022b: 103).
- ▶ Wayfinding strategies, including permanent and temporary signs, shall be implemented to provide directions on access to the New Zoo for pedestrians, bicyclists, and vehicles.
- ▶ Emergency access shall be maintained at all times, and emergency apparatus routes during the opening month and special events shall be reviewed by the City’s emergency service department for approval.

A4-7 The commenter requests that the BRT/LRT Extension Project be added to Table 4-2 in Chapter 4, “Cumulative Impacts.”

In response to this comment, Table 4-2 has been updated to include the Blue Line Light Rail Extension and/or Bus Rapid Transit Project. These edits are minor and do not constitute “significant new information” that would require recirculation of the Draft EIR under State CEQA Guidelines Section 15088.5

Table 4-2 on Page 4-3 of the Draft EIR has been revised as follows:

Table 4-2 Related Projects

#	Project	Location	Description	Status
21	Tegan Estate	5201 Tegan Road	Request to subdivide 3 existing parcels totaling 11.6 acres into 41 parcels and one remainder lot for residential development	Approved
<u>22</u>	<u>Blue Line Light Rail Extension and/or Bus Rapid Transit Project</u>	<u>City of Sacramento to City of Elk Grove</u>	<u>The project would extend the Blue Light line rail and/or bus rapid transit from the City of Sacramento to City of Elk Grove in the Big Horn/Kammerer Road area.</u>	<u>Conceptual Design</u>

Note: sq. ft. = square feet.

Sources: Compiled by Ascent Environmental in July 2023 based on review of City of Elk Grove 2023 and Sacramento County 2023

A4-7 The commenter states that coordination with SacRT will be critical in the reduction of VMT and GHG impacts, and agrees with the findings in the Draft EIR that there is no mitigation to fully reduce VMT and GHG impacts.

The City will coordinate with SacRT as the Project progresses to discuss expanding transit services in the Project area. This comment is noted.

Letter
A5

From: Cheryle Hodge <CHodge@cityofsacramento.org>
Sent: Thursday, February 22, 2024 4:13 PM
To: Christopher Jordan <cjordan@elkgrovecity.org>
Subject: DEIR Comments - New Zoo at Elk Grove

You don't often get email from chodge@cityofsacramento.org. [Learn why this is important](#)

[EXTERNAL EMAIL]

Mr. Jordan,
On January 9, 2024, the City of Sacramento received the Notice of Availability of the Draft Environmental Impact Report (EIR) for the proposed New Zoo at Elk Grove project. For the City of Elk Grove's consideration, I'm providing the following comments that are from our Department of Public Works staff:

Comments

The DEIR includes a VMT analysis with proposed mitigation in the CEQA transportation chapter. A Local Transportation Analysis (LTA) was provided in Appendix H and included an analysis of queues on Caltrans off-ramps at the State Route 99 & Kammerer Road interchange.

Comment#1: The project would result in a significant VMT Impact 3.13-2 for which all feasible mitigation is required. Table 3.13-4 contains CAPCOA transportation mitigation measures. The Notes column of this table indicates that the VMT reduction measure "T-6 Implement Commute Trip Reduction Program" was not feasible or applicable to the project because it had too few employees for implementation. CAPCO does not appear to limit this mitigation measure based on the number of employees. The table's notes section and footnote for T-6 do not contain a CAPCOA based justification regarding why T-6 should not be considered in reducing VMT and remain a relevant mitigation measure. Please see https://www.caleemod.com/documents/handbook/ch_3_transportation/measure_t-6.pdf

A5-1

Comment #2: The City of Sacramento's experience is Caltrans' precedence has been to request inclusion of a safety analysis of their facilities in the transportation section of environmental documentation and impact / mitigation statements. It's not known if Caltrans requested one for this project though Appendix H does provide a non-CEQA analysis of queues at off ramps to the SR99 & Kammerer Road interchange.

A5-2

We appreciate the opportunity to review the Draft EIR. Please add my contact info including email to the project notification list so that I may receive future notices. If you have any questions regarding the above comments, please feel free to contact me.

Thanks,

Cheryle Hodge
Principal Planner
300 Richards Blvd. 3rd Floor
Sacramento, CA 95811
(916) 808-5971



E-mail correspondence with the City of Sacramento (and attachments, if any) may be subject to the California Public Records Act, and as such may therefore be subject to public disclosure unless otherwise exempt under the Act.

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission.

Certain information that you provide us is subject to disclosure under the California Public Records Act or other legal requirements. This means that if it is specifically requested by a member of the public, we are required to provide the information to the person requesting it. We may share personally identifying information with other City of Elk Grove departments or agencies in order to respond to your request. In some circumstances we also may be required by law to disclose information in accordance with the California Public Records Act or other legal requirements.

LETTER A5 CITY OF SACRAMENTO

Cheryle Hodge, Principal Planner
February 22, 2024

This letter from the City of Sacramento was received on February 22, 2024 after the close of the comment period on February 20, 2024. As provided in State CEQA Guidelines Sections 15088(a) and 15207 the City is not required to respond to this letter as it was received following the close of the public review period for the Draft EIR. However, the response below is provided in the interest of the public record.

- A5-1 The commenter states that there is no minimum employee limit for implementing VMT commute trip reduction measures in the California Air Pollution Control Officers Association (CAPCOA) guidance and that the Project should consider such measures.
- As stated in a footnote on page 3.13-20 of the Draft EIR the commute reduction measures would not be feasible for the Project due to the number of employees proposed for the New Zoo, geographic distribution of employee residences, and employee schedules. The 300 employees for the New Zoo would reside throughout the Sacramento region and would not be concentrated in a single area that would be advantageous for carpooling or other similar measures. Employee schedules would not be conducive to commute reduction measures because employees have varied work schedules depending on their role at the New Zoo. For example, some employees would have an earlier morning shift, others would have a mid-day shift, and some would work overnight at the site. The commute reduction measures for VMT would thus not be effective at achieving VMT reductions and would not be suitable or feasible for the type of project proposed. The commenter provides no proposed mitigation measures or technical analysis to counter this conclusion. No changes to the Draft EIR are recommended.
- A5-2 The commenter states that the California Department of Transportation (Caltrans) often requires a safety analysis for their facilities as part of environmental documentation and impact analysis and that the transportation appendix to the Draft EIR did not include a queuing analysis for the off ramps to State Route 99 and the Kammer Road interchange.
- As stated on page 3.13-1 of the Draft EIR an analysis of traffic operations was completed for the Project, but was not included in the Draft EIR because a project's effect on automobile delay no longer constitutes a significant impact under CEQA (Kimley Horn 2023). The Local Access, Safety, and Circulation Study prepared for the Project concluded that the Project would contribute additional queuing to a baseline deficiency and create a queuing deficiency at the intersection of Kammerer Road and the State Route 99 ramps under cumulative 2025 conditions. However, queuing at the ramps is not anticipated to reach the mainline segment of State Route 99 and adversely affect freeway traffic conditions (Kimley Horn 2023). A letter from Caltrans regarding concern for their facilities was not received during the public review period for the Project.
- In response to this comment, page 3.13-22 has been updated to include mention of queuing on the State Route 99 ramps. These edits are minor and do not constitute "significant new information" that would require recirculation of the Draft EIR under State CEQA Guidelines Section 15088.5
- Page 3.13-22 of the Draft EIR has been revised as follows:
- The Project is anticipated to result in peak visitation during the opening month and large events. Modest amounts of queueing are anticipated during these times. Spillback beyond the provided queuing storage during opening weekend and opening month is anticipated and may increase safety hazards for guests navigating in and around the Project site (Kimley-Horn 2023a: 36). Queuing at the State Route 99 ramps is not anticipated to reach the mainline segment of State Route 99 and would not adversely affect freeway traffic conditions. However, queueing impacts are anticipated to include spillback from the main entrance gates onto Classical Way and from Classical Way through the adjacent Lotz Parkway intersections (Kimley-Horn 2023a:

38). Queueing that extends into surrounding intersections would disrupt pedestrian, bicycle, and vehicular movement and potentially increase conflicts between vehicles, bicyclists, and pedestrians. Additionally, drivers may use nearby residential streets for parking and alternative circulation routes, increasing the opportunity for transportation conflicts in the neighborhoods surrounding the Project site.

2.2.2 Individuals

Letter
11

From: [Jordbert Cedillo](#)
To: [Christopher Jordan](#)
Subject: Elk Grove zoo
Date: Friday, February 9, 2024 8:01:54 AM

You don't often get email from jordbertcedillo@gmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

To whom it may concern,
I am a current resident next door to the proposed zoo in Elk Grove. I live on Cello way. I for one am incredibly excited to have the zoo so close to where I live. And would look forward to being approved.

11-1

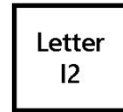
LETTER 11 JORDBERT CEDILLO

February 9, 2024

11-1

The commenter states that they are excited to have the New Zoo in Elk Grove.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.



From: [Kat Chang](#)
To: [Christopher Jordan](#)
Subject: Love to see the zoo!
Date: Thursday, February 8, 2024 2:56:19 PM

[You don't often get email from mitchbafu7@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

[EXTERNAL EMAIL]

Hi Mr. Jordan,

All of my family and friends can't wait for the zoo to arrive! I don't know if those who agree or are neutral with this new development will write to you, but those who oppose are usually more inclined to reach out to the officials.

So hopefully you also get to hear many voices like me who fully support this development. Really hoping it'd go through.

And just curious, when will the final approval stage take place? I see Spring 2024 on the website but is there an exact date?

Thank you for all you do.

Katherine

I
12-1
I

LETTER 12 KAT CHANG

February 8, 2024

I2-1 The commenter states that their family and friends are excited to have the New Zoo in Elk Grove.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

I2-2 The commenter asks when the final approval stage will take place. The comment explains that the website says Spring 2024 but does not include an exact date.

The final approval stages for the Project will occur in April and May of 2024. The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
13

From: Janine Comrack
To: Zoo Project
Subject: "New" Zoo at Elk Grove
Date: Thursday, February 8, 2024 5:14:37 PM

Some people who received this message don't often get email from janine@ojaimail.net. [Learn why this is important](#)

[EXTERNAL EMAIL]

Hello--

I have a question for you—will the absolutely wonderful merry-go-round (or carousel, if you will) be included in the new zoo? The incredible hand-made animal characters are (to me) more of a draw than the actual living residents in the zoo. If the zoo's almost 100 year legacy is to continue, the merry-go-round needs to be a part of it.(just sayin')

Thank you for your time.

Janine Comrack

13-1

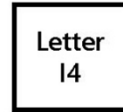
LETTER 13 JANINE COMRACK

February 8, 2024

13-1

The commenter asks if the carousel would be included in the New Zoo.

As stated on page 2-4 of the Draft EIR, "The Society would remove from the Sacramento Zoo and relocate to the New Zoo assets including but are not limited to the carousel and okapi barn."



From: [Judi Cutaia](#)
To: [Christopher Jordan](#)
Subject: Zoo
Date: Friday, February 9, 2024 11:57:57 AM

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[EXTERNAL EMAIL]

Hello,

Plans for zoo look good!
Sent from my iPhone

|
14-1
|

LETTER 14 JUDI CUTAIA

February 9, 2024

14-1

The commenter states that the plans for the New Zoo in Elk Grove look good.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
15

From: [Crystalyn Denny](#)
To: [Christopher Jordan](#)
Subject: Zoo project
Date: Thursday, February 8, 2024 10:50:10 AM

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[EXTERNAL EMAIL]

I believe Elk Grove should welcome the zoo with open arms! Its about time something is made of all the land. Without putting up more housing developments! What a great source of revenue for the city to have our Capital's zoo be housed! Please don't let this great opportunity slip by!

15-1

Kindest regards,

C Denny

LETTER 15 CRYSTALYN DENNY

February 8, 2024

15-1

The commenter states that they are excited to have the New Zoo in Elk Grove and believe it will create a great source of revenue for the City.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
16

From: [City of Elk Grove](#)
To: [Christopher Jordan](#); [Christal Love-Lazard](#); [Darrell Doan](#); [Kristyn Laurence](#); [Luis Aguilar](#)
Subject: Zoo Comment Submission
Date: Thursday, February 8, 2024 9:25:12 PM

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[EXTERNAL EMAIL]

Submitted on Thu, 02/08/2024 - 21:25

Submitted by: Anonymous

Submitted values are:

Name

Lisa Farrell

Email

lisnyogi@aol.com

Phone

[9169966220](tel:9169966220)

Comments/Questions

I think building the new Sac Zoo in Elk Grove would be wonderful for the city and the people who live here. It would be such a wonder benefit and opportunity for families with children. It would also likely give teens and adults/seniors an enriching place to volunteer. This would be so beneficial, especially for the teen and senior population. There will be so many benefits to both the city as well as the people of Elk Grove. Build it!

16-1

LETTER 16 LISA FERRELL

February 8, 2024

16-1

The commenter states that they are excited to have the New Zoo in Elk Grove and believe there will be many benefits to both the City and the people of Elk Grove.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
17

From: [Walt Hess](#)
To: [Christopher Jordan](#)
Subject: New Zoo
Date: Monday, February 5, 2024 10:11:16 AM

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[EXTERNAL EMAIL]

As residents of District 4 for the past 13 years, we strongly support City efforts to bring the Zoo to Elk Grove. The location is perfect with good access, very open and, as we understand it, zoned for a zoo.

We have read through the EIR and see nothing major that should stop the efforts from moving forward. The new Zoo will be positive addition to our wonderful community.

Regards.

Walt and Sharon Hess
9854 Derby Way

17-1

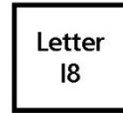
LETTER 17 WALT AND SHARON HESS

February 5, 2024

17-1

The commenter states that they strongly support the New Zoo in Elk Grove and trusts it will add to the community.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.



From: JyantiKaurTV
To: Christopher Jordan
Subject: Elk Grove Zoo
Date: Friday, February 9, 2024 11:20:46 AM

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[EXTERNAL EMAIL]

Hello,

I'm a resident in Elk Grove and I'm excited about out the zoo. My only concern would be health of the water. If there is a way to keep exposure of pollutants down to a minimal that will be great.

Thank you

18-1

LETTER 18 JAYANTI KAUR

February 9, 2024

18-1

The commenter expresses their excitement about the New Zoo but has concerns about water quality.

Impact 3.9-2 on pages 3.9-13 through 3.9-14 of the Draft EIR includes an analysis of impacts to water quality. As discussed in the impact analysis implementation of the Project would increase the total amount of impervious surfaces on the Project site through the construction of walkways, buildings, roadways, and parking lots. However, the Project would implement low impact development measures, including directing stormwater into a bioretention basin west of the Project site, to prevent the contamination of stormwater and allow the infiltration of stormwater on-site. All pollution control measures would be designed in accordance with the Sacramento Region Stormwater Quality Design Manual and enforced through the City permitting process.



From: [Suzanne Jumper](#)
To: [Christopher Jordan](#)
Subject: Zoo relocation
Date: Wednesday, January 10, 2024 9:39:05 AM

[You don't often get email from s95818sj@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

[EXTERNAL EMAIL]

I vote for NO.
 Of all of the needs in Elk Grove and Sacramento, this too expensive.
 The renovation and partial move will take years.
 The Oakland Zoo and San Francisco Zoo are near enough for different zoo experiences.
 The Land Park zoo is adequate and actually quaint.
 And other than employees, and those seeking to profit from the move; I've never heard of a visitor to the zoo say "Hey, we need a bigger zoo".

I give these opinions as somebody who patronize the zoo up until five years ago regularly four years with my grandchildren. I had a zoo pass, and the kids were happy every time we went.
 Suzanne Jumper

Sent from my iPad

19-1

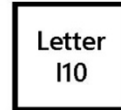
LETTER 19 SUZANNE JUMPER

January 10, 2024

I9-1

The commenter states that they would like the zoo to remain in Land Park and do not support the New Zoo in Elk Grove.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.



From: KapahiR
Sent: Thursday, February 15, 2024 11:05 AM
To: Peter Hoholick
Subject: New Zoo DEIR - - Energy Section

Hello Peter,

I read with interest the draft EIR for the Sacramento Zoo proposed for Elk Grove. Your name appears as one of the preparers.

I
I10-1

My question is related to Section 3.5 "Energy". and a determination if the project would result in wasteful, inefficient energy use.

Appendix F presents several energy usage worksheets that summarize energy usage by phase and year, however, it is not clear how that data is used to conclude the project efficiency?

I
I10-2

What performance metric is used to determine if the project is using energy efficiently?

I
I10-3

Thank you for your time.

--
 Ray Kapahi

LETTER I10 RAY KAPAH

February 15, 2024

I10-1 The comment is introductory in nature.

The comment does not address the adequacy of the EIR analysis, and no further response is required. The comment is noted.

I10-2 The commenter asks how data was used to conclude project efficiency.

The City of Elk Grove and the Sacramento Metropolitan Air Quality Management District (SMAQMD) do not have quantitative metrics to determine Project efficiency; therefore, energy impacts were determined based on the inquiries of Appendix G of the CEQA Guidelines. As discussed under the heading, "Thresholds of Significance," on page 3.5-7 of the Draft EIR, Appendix G provides the following questions to determine the significance of an energy impact:

- ▶ result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during Project construction or operation, or;
- ▶ Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

As discussed on page 3.5-7 of the Draft EIR, gasoline and diesel fuel consumption were calculated by converting carbon dioxide equivalent (CO₂e) estimates from the California Emissions Estimator Model (CalEEMod) runs to gallons of fuel consumed. Electrical energy consumption was also converted to million British thermal units (MMBtu) per year from kilowatts per house (KWh) from the CalEEMod estimates. These findings can be found in Table 3.5-1, "Construction-Related Fuel Consumption" on page 3.5-8 and in Table 3.5-2, "Operation-Related Building Energy Consumption (2043)" on page 3.5-9 of the Draft EIR.

Impact 3.5-1 of the Draft EIR determines that the Project would not consume energy in a wasteful, inefficient, or unnecessary way during Project construction or operations. The Project would incorporate photovoltaic (PV) solar systems to supply clean electricity, be fully electric to eliminate natural gas dependency, and include on-site electric vehicle (EV) chargers and bicycle infrastructure to reduce gasoline consumption for transportation. The Project includes these design features to ensure energy efficiency. Additionally, Impact 3.5-2 outlines policies from the City of Elk Grove Climate Action Plan that the Project is consistent with to ensure energy is used efficiently. Through consistency with these policies as well as the aforementioned Project design features to reduce natural gas consumption, provide renewable energy on-site, and reduce gasoline and diesel fuel consumption through EV charging and bicycle infrastructure, the Project was determined to use energy in an efficient manner. No changes to the EIR are required in response to this comment and no further response is required.

I10-3

The commenter asks what metric is used to determine Project efficiency.

Please refer to Response I10-2. The analysis provides a quantitative estimate of the potential increase in gasoline and diesel fuel measured in gallons as well as the increase in electricity consumption measured in MMBtu/year. The analysis also estimates the amount of electricity that would be generated from on-site solar photovoltaic panels, which is credited to the Projects overall increase in electricity consumption. The analysis then aligns certain Project design features, which are enumerated above, to demonstrate consistency with the City of Elk Grove's Climate Action Plan. Because the Project's includes certain characteristics (e.g., decarbonized development, on-site renewable energy generation, EV charging infrastructure, and bicycle infrastructure), the Project would not use energy in a wasteful, inefficient, or unnecessary way, as outlined in Impact 3.5-1. The most recent version of part 6 of the Title 24 California Building Code (2022 California Energy Code) does not require nonresidential development to be fully electric or include renewable energy, therefore the Project has included these as design features to reduce the overall energy consumption associated with the Project. The Project has been designed to include 87 EV ready and 240 EV capable (27 percent of total parking), which has been supplemented by the requirements of Mitigation Measure 3.7-1 (i.e., including EV charging infrastructure meeting the Tier 2 requirements of the CalGreen Code for nonresidential development). These Project design features and additional mitigation demonstrate consistency with Policies BE-3, BE-7, TACM-4, and TACM-9 of the Climate Action Plan, as outlined in Impact 3.5-2. Therefore, the Project would not conflict with an applicable plan to promote renewable energy or energy efficiency. In lieu of a numerical efficiency metric developed by the City of Elk Grove or SMAQMD, these qualitative criteria were used to determine that the Project would have a energy impact. No changes to the EIR are required in response to this comment and no further response is required.

Letter
I11

From: Eileen Le
To: Christopher Jordan
Subject: Zoo Upgrades comments Thank You
Date: Friday, February 9, 2024 5:39:39 PM

You don't often get email from eileenle1982@gmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

Hi Elk Grove Zoo Stakeholders,

I think like a animal science kidtropolis would be so cool to have. With the trends of safety, weather, and health the popularity of indoor playgrounds are popular. Normally people don't think of going to the zoo on rainy days, but having many indoor interactive options relating to zoo and environment theme will help the zoo be popular year round. I also think having the right selection of food & beverages will make it an appeal for revenue, people will spend it there. Having event packages will be great too. We also lack local aquatic animal options if that is possible it would be cool.

I11-1

Thank you for your time hearing us.
Respectfully
Eileen

LETTER I11 EILEEN LE

February 9, 2024

I11-1

The commenter proposes establishing a kidtropolis at Elk Grove Zoo, citing the appeal of indoor playgrounds aligned with safety, weather, and health trends, and suggesting that incorporating various indoor interactive options related to zoo and environmental themes could enhance year-round popularity. The commenter recommends careful selection of food and beverages to attract revenue, along with the implementation of event packages. The commenter also states the absence of local aquatic animal options and expresses interest in exploring this possibility.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
112

**New Zoo in Elk Grove
Draft EIR Public Comment Meeting
Comment Card**



Name: STEVE L Phone: _____

Email: STEVE (KATHY) LEE@GMAIL.COM

Comments: W/ THIS KIND OF COMMITMENT THIS
NEEDS TO BE PLACED ON A BALLOT FOR APPROVAL

THERE IS A DEMAND FOR A PUBLIC HEARING WHEN FUNDING
IS IN PLACE & BEFORE PROPOSED VOTE BY COUNCIL

112-1

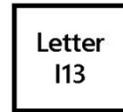
LETTER 112 STEVE LEE

February 6, 2024

112-1

The commenter states that this type of project needs to be placed on a ballot for approval. The commentor requests a public hearing and a proposed vote by City Council.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.



From: [Jordan Lumaquin](#)
To: [Christopher Jordan](#)
Subject: Elk Grove Zoo
Date: Thursday, February 8, 2024 5:05:59 PM

You don't often get email from riverjordan79@gmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

Please bring the Zoo to Elk Grove! Moved to Sacramento in 1990, and then to Elk Grove in 2006. My family and I would love to have the Zoo here!

I
I13-1

LETTER I13 JORDAN LUMAQUIN

February 8, 2024

I13-1

The commenter states that their family is excited to have the New Zoo in Elk Grove.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
I14

From: Jay Maestas
To: Christopher Jordan
Subject: Elk Grove Zoo
Date: Thursday, February 8, 2024 3:07:43 PM

You don't often get email from jay.maestas@gmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

Good afternoon,

I applaud your work to bring the Zoo to Elk Grove. I hope your hard work is successful. Elk Grove needs more entertainment especially ones that can leave a lasting impression on families that wish to experience nature and learn about unique wild animals.

I14-1

Thank you

Jay

LETTER I14 JAY MAESTAS

February 8, 2024

I14-1

The commenter states that they are supportive of having the New Zoo in Elk Grove and believes Elk Grove needs more entertainment for families that wish to experience nature and learn about animals.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
I15

From: Yahoo Mail
To: Christopher Jordan
Subject: Yes to new zoo
Date: Thursday, February 8, 2024 4:37:16 PM

[You don't often get email from geoffmayfield@sbcglobal.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

[EXTERNAL EMAIL]

I am a resident of district 2 and am pro- zoo in Elk Grove. The sooner the better.

I15-1

-Geoff Mayfield

LETTER I15 GEOFF MAYFIELD

February 8, 2024

I15-1

The commenter states that they support having the New Zoo in Elk Grove.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.



From: [Bonnie & Bruce McKinnie](#)
To: [Christopher Jordan](#)
Subject: Proposed Elk Grove Zoo
Date: Wednesday, January 10, 2024 1:44:14 PM

You don't often get email from bbmckinnie@gmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

I am writing to express my enthusiastic support for the proposed zoo project. I urge the city to make the current plan a reality. The larger site would be ideal to bring tourism and income to Elk Grove, as well as creating a much better life for the threatened and endangered species the zoo will house.

I16-1

Thank you for your work on this project.

Bonnie McKinnie

LETTER I16 BONNIE MCKINNIE

January 10, 2024

I16-1

The commenter states that they support having the New Zoo in Elk Grove.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
I17

Comments on the City of Elk Grove Zoo EIR
by Michael Monasky
February 20, 2024

The EIR is incomplete and therefore inaccurate...

The city and its consultant decided to perform a health risk impact assessment as part of its EIR for the zoo. The report is incomplete and therefore inaccurate and should include the neglected items indicated below.

I17-1

Cancer plays second fiddle to heart and lung diseases...

Appendix E of the report contains a five page explanation of an additional 360 page core data dump. Unfortunately, the report only addresses the acute stage of exposure to toxic air contaminants during construction of the zoo; it does not explain the chronic additional toxic exposures due to 1.1-1.6 millions individuals driving cars each year to visit the zoo. Additionally, the report only looks at deaths due to cancer, which are more than two and a half times the level permitted by law. Unmitigated construction techniques and processes will result in many more cancer deaths for our community. Cancer competes with heart and lung diseases as the number one cause of death in the United States; in fact, heart disease is number one, and lung disease is number four. This appendix makes no mention of increases in such diseases as congestive heart failure, chronic obstructive lung disease, asthma, emphysema, and interaction with other, complicating co-morbid conditions such as viral and bacterial infectious ailments.

I17-2

UCD - 15 Leading Causes of Death ↓	⇒ Deaths ↕	⇄ Population ↕	← Crude Rate Per 100,000 ↕
#Diseases of heart (I00-I09,I11,I13,I20-I51)	673,594	333,287,557	202.1
#Malignant neoplasms (C00-C97)	611,963	333,287,557	183.6
#Cerebrovascular diseases (I60-I69)	162,070	333,287,557	48.6
#Chronic lower respiratory diseases (J40-J47)	144,567	333,287,557	43.4
#Accidents (unintentional injuries) (V01-X59,Y85-Y86)	136,771	333,287,557	41.0
#Alzheimer disease (G30)	113,904	333,287,557	34.2
#Diabetes mellitus (E10-E14)	94,355	333,287,557	28.3
#Nephritis, nephrotic syndrome and nephrosis (N00-N07,N17-N19,N25-N27)	55,065	333,287,557	16.5
#Chronic liver disease and cirrhosis (K70,K73-K74)	51,784	333,287,557	15.5
#COVID-19 (U07.1)	49,608	333,287,557	14.9
#Influenza and pneumonia (J09-J18)	44,613	333,287,557	13.4
#Essential hypertension and hypertensive renal disease (I10,I12,I15)	42,180	333,287,557	12.7
#Septicemia (A40-A41)	41,474	333,287,557	12.4
#Parkinson disease (G20-G21)	40,132	333,287,557	12.0
#Intentional self-harm (suicide) (*U03,X60-X84,Y87.0)	30,402	333,287,557	9.1

<https://wonder.cdc.gov/controller/datarequest/D176.jsessionid=5C660EDABA71AAAD9084BE05B88D>

Cars suck air 80 to 400 times faster than human beings...

Realize that at rest a human being consumes about 5-10 liters of air per minute; a two-liter engine idling at 800 revolutions per minute consumes 800 liters of air per minute, or about 80 to 160 times more than a human being. While cruising at 2,000 revolutions per minute, the two liter internal combustion engine takes in air 200 to 400 times faster than a human being. This plan and its report encourage individual automobile use over public transit and ignore the impacts of human health risks. https://www.youtube.com/watch?v=8EeUGcKiG_w

I17-3

Violent, exploding suburbs...

The city has had a reputation of rampant development as evidenced by the explosive population growth since incorporation in 2000. Neighboring cities, such as Rancho Cordova and Folsom, have the same intentions to build until they explode. Most of that development here and there takes shape as single family dwellings which defy public transit planning and implementation. We are in for more global warming, flooding in the valley, increases in heart and lung chronic diseases, not to mention gridlock on our streets.

I
117-4
I

Pave paradise, put up a parking lot...

Ten acres of this 65 acre project is committed to automobile parking. Two lots are mentioned, one paved with asphalt, the other with gravel. The zoo plan expects 1.6M visits each year; that would be over 4,300 visitors a day, every day. With 1,700 parking spaces in both lots, each car must carry at least three visitors each day every day of the year in each parking space. How much pollution each car will deposit into the atmosphere is not mentioned in the report. The math just doesn't add up.

I
117-5
I

CEQA sets a higher bar than that met by the city and its contractor..

VMT impacts human health and the natural environment. Human health is impacted as increases in vehicle travel lead to more vehicle crashes, poor air quality, increases in chronic disease associated with reduced physical activity, and worse mental health. Increases in vehicle travel also negatively affect other road users, including pedestrians, cyclists, other motorists, and many transit users. The natural environment is impacted as higher VMT leads to more collisions with wildlife and fragments habitat. Additionally, development that leads to more vehicle travel also tends to consume more energy, water, and open space (including farmland and sensitive habitat). This increase in impermeable surfaces raises the flood risk and pollutant transport into waterways.

I
117-6
I
117-7
I
117-8
I

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-04-13-qanda-implementationtimingmemo-a11y.pdf>

So it's back to the drawing board, boys and girls...should this project ever attain the better part of a billion dollars needed to build it in the first place.

LETTER I17 MICHAEL MONASKY

February 20, 2024

- I17-1 The commenter states the EIR's health risk assessment (HRA) is incomplete and neglected cancer risks, vehicle emissions, the expansion of the City of Elk Grove, parking, and CEQA impacts.
- This comment is introductory and more detailed responses to this comment are discussed below. This comment is noted.
- I17-2 The commenter states the HRA only addresses acute stage of exposure to TACs during construction and not chronic toxic exposures. The commenter states that the HRA only evaluates cancer deaths, not the increase in heart failure, lung diseases, and asthma and that the unmitigated HRA has a cancer risk over twice the threshold.
- The Project HRA was conducted in accordance with SMAQMD's CEQA guide for *Dispersion Modeling of Construction-Generated PM10 Emissions*. This modeling guidance was established by the US Environmental Protection Agency (EPA), the California Air Resources Board (CARB), and other air districts in California, including SMAQMD. Following the methodology of this document to determine impacts from construction, the HRA conducted for the Project was limited to construction-generate diesel PM as operation of the Project would not introduce a new stationary source of pollution nor require intensive operation haul truck activity. As noted in Section 3.2.2 pages 3.2-12 and 3.3-13 of the Draft EIR, criterial air pollutants are those that can result in health effects such as asthma and lung disease. Please refer to Response I17-3 for additional information regarding the health impacts of the Project as they relate to criteria air pollutants.
- Using SMAQMD's adopted thresholds of significance of an increased risk of over 10 chances in one million, unmitigated construction emissions were found to result in an increased risk of over 26 chances in one million (Table 3.2-9 on Draft EIR page 3.2-22). However, implementation of Mitigation Measure 3.2-3 on page 3.2-22 of the Draft EIR, would require tier 4 engines to be used during construction, reducing the chances 5.23 chances in one million, resulting in a less than significant impact, as seen in Table 3-2.9 "Maximum Cancer Risk under a Mitigated Project Scenario" on page 3.2-22 of the Draft EIR. No edits to the EIR are required in response to this comment and no further response is required. This comment is noted.
- I17-3 The commenter states that humans consume about 5-10 liters of air per minute while an idling two-liter engine at 800 revolutions per minute consumes 800 liters of air per minute. Additionally that while cruising at 2,000 revolutions per minute, a combustion engine intakes air 200-400 times faster than a human being and that the plan and report encourage individual automobile over public transit and ignores the impact of human health risk.
- Section 3.13, "Transportation," of the EIR summarizes Project design features that would be implemented to discourage individual automobile usage and encourage alternative modes of transportation to the zoo (i.e., bicycle and pedestrian infrastructure). As mentioned in Impact 3.13-1 of the EIR, the Project would implement off-site bicycle and pedestrian facilities along the Project frontage on Road B, Lotz Parkway, and along the northern perimeter of the Project site. Additionally, Mitigation Measure 3.13-2b from the Draft EIR would provide a local transit stop at the New Zoo to further encourage public transit and discourage personal cars and further reduce VMT associated with the Project. These project design features promote alternative modes of transportation beyond internal combustion engines. While implementation of the Project would result in additional VMT to the Project area, the Project would provide the necessary infrastructure to support EV charging as well as bicycle and pedestrian facilities, thus resulting in a direct decrease of the anticipated VMT from internal combustion engine-powered vehicles. Moreover, Mitigation Measure 3.7-1 requires the Project to install EV charging meeting the Tier 2 requirements of the 2022 CalGreen Code, thus providing the necessary infrastructure to promote the use of zero-emission vehicles.

Additionally, health effects from the Project were analyzed in Section 3.2, "Air Quality" on pages 3.2-19 and 3.2-20 of the Draft EIR. Consistent with SMAQMD's Final Friant Ranch Guidance, SMAQMD's Minor Project Health Effects Screening Tool was used to estimate annual incremental health incidences from operational air pollutant emissions and shown in Table 3.2-7, "Potential Annual Incremental Health Incidences for the Project" on page 3.2-20 of the Draft EIR. The percent of background health incidences represents the mean health incidence from PM_{2.5} and ozone exposure within the boundaries of the Sacramento Valley Air Basin. The total number of health incidences is an estimate of the average number of people who are affected by the health endpoint in a given population over a given period. Based on this modeling, operational emissions from implementation of the Project would represent approximately 0.035 percent of all total incidences from exposure to ozone and PM_{2.5} in the context of an incident background of 184,505, or approximately 0.65 health incidence in total, as shown on page 3.2-20 of the Draft EIR.

No edits to the EIR are required in response to this comment and no further response is required. This comment is noted.

I17-4

The commenter states his displeasure with the rapid expansion of Elk Grove and the effects it may have on public planning transit, climate change, flooding, and human health.

The Project is not proposing residential development; therefore, the Project does not contribute to population growth. Additionally, as stated in Draft EIR Section 3.13, "Transportation," the Project is implementing design features to reduce VMT and thus alleviate transportation impacts. These features include a transit stop near the New Zoo to encourage public transportation and bike and pedestrian facilities to encourage visitors to bike or walk to the New Zoo. No edits to the EIR are required in response to this comment and no further response is required. This comment is noted.

I17-5

The commenter questions how 1,700 parking spaces will accommodate 4,300 visitors a day and states that car pollution is not mentioned in the report.

The parking need for the New Zoo was calculated based on an average vehicle occupancy of 3.3 persons per vehicle, as determined by the Urban Land Institute for suburban event venues. The ratio was then applied to the anticipated maximum daily attendance of 11,000 visitors, along with other factors such as the percent of visitors who drive (verses walk, bike, or take transit) and peak hour attendance. This resulted in a total of 1,600 parking spaces for the Project. Of this parking need, only about 500 parking spaces would be needed for the majority (72 percent of days) of the year. The total number of proposed parking spaces would be needed for the remainder of the year (28 percent of the days) during peak spring and fall periods.

As mentioned in section 3.13, "Transportation," the New Zoo is implementing design features to discourage personal vehicles as the primary mode of transportation. These include a local public transit stop to encourage public transportation and pedestrian and bicycle facilities to encourage means of transportation other than personal vehicles.

Operational mobile criteria pollutants and precursor emissions were evaluated in Tables 3.2-5 "Maximum Annual Emissions of Criteria Pollutants and Precursors Associated with Operation of the Project at the Initial Opening (2029)" and 3.2-6 "Maximum Annual Emissions of Criteria Pollutants and Precursors Associated with Operation of the Project at full buildout (2043)" on page 3.2-19 of the Draft EIR. At the initial opening, mobile sources from the New Zoo would generate less than a pound per day of each criteria pollutant and precursor with the exception of Carbon Monoxide (CO), which would generate 3 pounds per day. Mobile emissions were determined to be under the SMAQMD threshold. At full buildout, mobile emissions would generate 6 pounds of ROG, 5 pounds of NO_x, 73 pounds of CO, less than a pound of SO_x, 21 pounds of PM₁₀, and 5 pounds of PM_{2.5}. At full buildout mobile sources emissions from the New Zoo would be under the SMAQMD thresholds.

Operational mobile energy was evaluated on page 3.5-9 of the Draft EIR. Mobile emissions from the New Zoo would generate 42,800.7 million British thermal units per year. To help reduce this impact the New Zoo would install EV parking spaces and bicycle parking spaces to further reduce mobile energy usage.

Operational mobile GHG emissions were evaluated in Section 3.7, "Greenhouse Gas Emissions and Climate Change." At the initial opening in 2029, mobile emissions from the New Zoo would generate 144 metric tons (MT) CO_{2e}. At full buildout the New Zoo would generate 3,126 MTCO_{2e}, as shown on page 3.7-12 of the Draft EIR. Mitigation Measure 3.7-1a on page 3.7-14 of the Draft EIR would require additional EV Capable and EVSE Parking Spaces to further reduce mobile GHG emissions. Emissions from car pollution have, thus, been accounted for in the EIR.

No edits to the EIR are required in response to this comment and no further response is required. This comment is noted.

117-6 The commenter states increased vehicle travel leads to more vehicle crashes, poor air quality, increases in chronic diseases, and worse mental health.

Please refer to Response 117-5 for a discussion of mobile air quality emissions from the Project.

Health effects were analyzed on page 3.2-20 of the Draft EIR and are shown in Table 3.2-7 "Potential Annual Incremental Health Incidences for the Project." Based on the modeling, operational emissions from implementation of the Project would represent approximately 0.035 percent of all total incidences from exposure to ozone and PM_{2.5} in the context of an incident background of 184,505, or approximately 0.65 health incidence in total. Notably, SMAQMD's Minor Project Health Effects Screening Tool projects new health incidences for projects that emit criteria air pollutants in volumes equaling 82 lb/day for ROG, NO_x, PM₁₀, and PM_{2.5}. However, as shown in Tables 3.2-5 and 3.2-6 of the Draft EIR, the Project would emit substantially less ROG, NO_x, PM₁₀, and PM_{2.5} than characterized by the Minor Project Health Effects Screening Tool. Therefore, the potential new health incidences overstate the likely new adverse health outcomes that could occur from Project operations.

No edits to the EIR are required in response to this comment and no further response is required. This comment is noted.

117-7 The commenter states increased VMT would lead to more collisions with wildlife and habitats.

As stated on page 3.3-16 of the Draft EIR, "the Project site is not located in a Natural Landscape Block or Essential Habitat Connectivity Area (Spencer et al. 2010; CDFW 2023). implementing the Project would not interfere substantially with the movement of any native resident or migratory wildlife species." Because there is minimal wildlife movement around the Project site the Project would not substantially increase wildlife collisions. The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

117-8 The commenter states increased VMT tends to consume additional energy, water, and open space that will increase risk of flooding.

Please refer to Response 110-2 for a discussion of the efficient energy use from the Project. Increased VMT from the Project would not consume additional water or open space as VMT is an increase in the length of vehicle trips. Please refer to Response 18-1 for a discussion of Project features that would reduce flood risk and pollutant transport from the site. The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
I18

From: Ty Morgan
To: Christopher Jordan
Subject: zoo
Date: Thursday, February 8, 2024 8:25:48 AM

You don't often get email from tysmorgan@yahoo.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

I don't have any particular expertise in the area of environmental impact for humans, but the animals deserve a better environment. The Sacramento Zoo is woefully out of date, and the animals suffer there from a lack of space etc. This move would give them such a better life.

I18-1

And really aren't we just moving the environmental impact rather than adding to it?

Sincerely,
Ty Morgan

Sent from Yahoo Mail for iPhone

LETTER I18 TY MORGAN

February 8, 2024

I18-1

The commenter states concern for the well-being of animals at the Sacramento Zoo, citing insufficient space. The commenter continues that relocating the zoo would provide a better life for the animals and questions whether the move merely shifts environmental impact rather than adding.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
119

From: [Suzanne Morikawa](#)
To: [Zoo Project](#)
Subject: Resident input on zoo
Date: Tuesday, February 6, 2024 1:45:37 PM

Some people who received this message don't often get email from smormad@gmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

Hello,

I am a resident of Elk Grove and wanted to share my thoughts on moving the Sacramento Zoo to Elk Grove. I visited zoos in the Bay Area often when my child was young. Our favorite zoo was the Oakland Zoo, which didn't have many animals but had much more animal-centric enclosures.

I19-1

When we visited the Sacramento Zoo, I found it to be the most depressing zoo we had visited anywhere. I had to lift him to be able to see any animals behind the cage link fences enclosing their very small enclosures. It was horrible. I never went back after that one visit.

I would rather see more support for ranch and farmland in Elk Grove. Instead of paving over farmland and pastures for parking lots, buildings and houses, what kind of support is the city offering to keep its farmers and ranchers? Sacramento prides itself as the "Farm to Fork Capital" yet it will be getting rid of open farmland in favor of a zoo.

I19-2

In this age, I feel instead of moving the zoo, it should be shut down. There are zoos in other nearby cities. We don't need a larger zoo here in Sacramento. It is quite insulting to say that moving the zoo to Elk Grove will make it accessible to Sacramento residents when it will require a car to access. Plans to expand the Elk Grove transportation system and a hopeful nod towards a light rail does not make it accessible. The Elk Grove public transit is not very accessible to Elk Grove residents, unless they live off of Laguna or Elk Grove Blvd and travel only during rush hour in the morning and evening.

I19-3

I know I am in the minority, but I feel strongly that this is another "shopping center" when it's talked about "all the jobs" that will be available. We all still have to commute to jobs elsewhere because the only jobs in Elk Grove are retail and restaurant (chain restaurants at that!).

I19-4

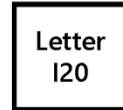
No to the Zoo.

Suzanne Morikawa

LETTER I19 SUZANNE MORIKAWA

February 6, 2024

- I19-1 The commenter recounts a negative experience at the Sacramento Zoo, describing it as depressing and has concerns about inadequate animal enclosures.
- The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
- I19-2 The commenter states that they would prefer to have ranch and farmland in Elk Grove instead of a zoo.
- As stated on page 3-3 of the Draft EIR, “[t]he SEIR certified for the City of Elk Grove General Plan Amendments and Update of Vehicle Miles Traveled Standards Project (SCH No. 2022020463) evaluated the potential for impacts on agricultural resources in the City’s Livable Employment Area (LEA) Community Plan Area, including the Project site. The SEIR identified the Project site as a New Zoo and identified the loss of Farmland of Statewide Importance and conversion from grazing land to development of a zoo.” The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
- I19-3 The commenter states that they do not approve of moving the zoo to Elk Grove and believe the Sacramento Zoo should be closed. The commenter states that the New Zoo would not be accessible to Sacramento residents if it is in Elk Grove.
- Please see Draft EIR Section 3.13, “Transportation”, for a discussion of accessibility to the New Zoo for residents and visitors throughout the Sacramento region. The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
- I19-4 The commenter states that the New Zoo would be another “shopping center” and that the only jobs in Elk Grove are in retail and restaurants, requiring residents to commute elsewhere for work.
- The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.



From: Michele Nanjo
To: Christopher Jordan
Subject: Zoo in Elk Grove
Date: Friday, January 12, 2024 9:55:08 PM

You don't often get email from mdnanjo@comcast.net. [Learn why this is important](#)

[EXTERNAL EMAIL]

Hello,
 I enthusiastically support construction of the proposed zoo in Elk Grove. We have the space and once the South-East Connector is complete, it will provide convenient zoo access to the entire Sacramento region. The Sacramento area deserves a large, modern zoo that can provide not only education to the public, but first class care to the animals. There is no better place to locate this facility in our region than Elk Grove.
 Regards,
 Michele Nanjo
 10186 Atlantis Drive
 Elk Grove, CA 95624

I20-1
 I20-2

LETTER I20 MICHELE NANJO

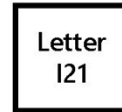
January 12, 2024

I20-1 The commenter states that they support having the New Zoo in Elk Grove. The commenter states the need for a large, modern zoo to provide education to the public and first-class care for the animals, asserting that Elk Grove is an ideal location for such a facility.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

I20-2 The commenter highlights the available space and anticipates increased accessibility with the completion of the South-East Connector, making the New Zoo convenient for the Sacramento region. The commenter emphasizes the need for a large, modern zoo to provide education to the public and first-class care for the animals, asserting that Elk Grove is an ideal location for such a facility.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.



From: JM Nemmers
To: Zoo Project
Subject: Comment re: proposed zoo
Date: Wednesday, January 10, 2024 9:02:45 AM

[Some people who received this message don't often get email from marknemmers@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

[EXTERNAL EMAIL]

Greetings,

I'm pleased that a modern zoo is being planned for the Elk Grove area. My only request is that the animal exhibits be designed to allow visibility from the viewpoint of young children. As a grandparent, this would be a major improvement over the high (+- 4') barriers between visitors and many of the animal exhibits at the existing Land Park zoo. These barriers currently prevent young children from seeing the animals without being frequently hoisted up by taller and older people for a proper view. Frustrating and limiting for the kids, to say nothing of being physically demanding on adults, especially us older ones!

I21-1

I wish you the best of luck on the new zoo, an impressive and long-overdue addition to the quality of life for Sacramento area residents.

Very best regards,

J. Mark Nemmers
 Sacramento, CA

LETTER I21 J. MARK NEMMERS

January 10, 2024

I21-1

The commenter is pleased with the modern plans for the New Zoo in Elk Grove and suggests designing animal exhibits for better visibility for young children as it would enhance the overall experience for families.

The New Zoo at Elk Grove would be designed to enhance the visitor experience, allowing viewing for people of all ages and abilities. The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
I22

From: [Utsav Patel](#)
To: [Christopher Jordan](#)
Subject: Zoo Comments
Date: Thursday, February 8, 2024 10:18:50 PM

You don't often get email from utsav.patel.82292@gmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

I read the article on ABC10. As a resident of Elk Grove I have no concerns about the construction of the zoo and support the zoo being built where it will be with the proposed upgrades. I am excited to have a zoo in our city and am looking forward to the tourism it will bring in for the city.

I
122-1
I

Thanks,
Utsav Patel

LETTER I22 UTSAV PATEL

February 8, 2024

I122-1

The commenter states that they are excited to have the New Zoo in Elk Grove and look forward to the tourism it will bring for the City.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
123

From: [Alejo Patten](#)
To: [Christopher Jordan](#)
Subject: Sacramento Zoo to Elk Groove immediately
Date: Sunday, February 11, 2024 6:00:32 PM

You don't often get email from alejopatten@icloud.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

Title:
A Perspective of the Elk Groove Zoo from a man living in Galt: By Alejo Patten

Opinion:

As someone who lives in the town of Galt and drives near the proposed future site and works in elk groove and who's visited the current zoo, I feel Elk groove would be a massive improvement to what we haven at Sacramento, face the facts the current thirteen acre zoo in Sacramento is too small, like the size of tomorrow land or carsland in disneyland (not very big). I visited the zoo this week and my god so many animals were sad, the line for food was very long and the people at the zoo were very short staffed. There's another thing to consider, not all of us can make it to San Diego, and it would boost the towns economy. I don't think environmental issues will be a problem since California is known to have good weather and we are pushing for carbon neutral tech, you can be damm well sure those engineers could build solar powered buildings with electric safari vehicles and find ways to create wells or rainwater containers for the animals. I assume members on the team are former Disney imagineers and let me tell ya, if those guys are on the team. if you ask them to build a mountain, they will build the mountain. I know money is always a factor but come on people what happened to risk taking, also we just got out of a pandemic and bringing something positive to the community in these times would be a good thing, also if a casino can be approved here in town I don't see why a zoo cant. To the politicians, think about it as well, you guys approve the zoo there would be more people voting for y'all and you would have even more backing than before. Regarding the noise impact, the zoo is gonna be in a pretty decent farmland and I'm sure they can build noise barriers (you can not really hear anything outside the current zoo), not many people live there and honestly if a zoo was just across the street from me I think that be the coolest thing in the world and as a kid I would hang out there every day. Then there are people in elk groove who need jobs and there are those who wish to train to become animal caretakers or veterinarians, you are opening a treasure trove of educational opportunities with this zoo, imagine collaborations with colleges and high schools. I know we feel a need for more housing in the city, but as a galtonian heed my words of warning you cant have a successful town if there's more houses than jobs.

123-1
123-2
123-3
123-4
123-5

Mr. Patten of Galt signing out.

LETTER I23 ALEJO PATTERN

February 11, 2024

- I23-1 The commenter states strong support for the New Zoo in Elk Grove, anticipating it to surpass the current Sacramento Zoo in size and visitor experience.
- The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
- I23-2 The commentor states the New Zoo could boost the local economy and is not concerned about environmental issues. The commentor continues that former Disney imagineers on the Project could address any issues with innovative and sustainable solutions.
- The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
- I23-3 The commentor encourages community support of the zoo and draws parallels to a casino approval, suggesting it could enhance politicians' voter support and positively impact the community post-pandemic.
- The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
- I23-4 The commentor states that any noise concerns from the New Zoo could be addressed with noise barriers and that the Sacramento Zoo is not very loud.
- As discussed in Section 3.11, "Noise," of the Draft EIR the New Zoo would result in noise impacts from construction and amplification during the nighttime safari. These noise impacts would be reduced with Mitigation Measure 3.11-1: Implement Measures to Reduce Exposure of Noise-Sensitive Receivers to Construction-Generated Noise and Mitigation Measure 3.11-5: Restrict Noise Levels from Amplification Devices.
- I23-5 The commentor states that the New Zoo would provide employment and educational opportunities in Elk Grove.
- The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
124

From: [Petalcorin, Kimberly](#)
To: [Christopher Jordan](#)
Subject: Elk Grove Zoo Suggestions
Date: Wednesday, January 10, 2024 11:00:54 PM

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[EXTERNAL EMAIL]

Some suggestions to Elk Grove Zoo:

1st in the world zoo experience to place Elk Grove in the center of tourism and eco-friendly operation. Examples: zero plastic waste, zero water waste, green energy, innovative animal-human interaction (virtual reality and 3-D).

Summer Kids Camp for little Zookeepers/Rangers with indoor and outdoor hybrid classrooms.

Selected animal enclosures with center 360-degree view for visitors.

Bamboo forest theme with wooden hanging bridge.

Rainforest theme with butterflies

Safari-style theme with safari jeep

Overnight stay at tree house themed accommodation with open sky ceiling.

Huge Waterfalls inspired by famous California waterfall (Yosemite Falls or Burney Falls)

This zoo is Elk Grove's ticket to become world-renowned, own it! Chance like this might not happen again. Partner with Facebook, Google, or other Silicon Valley companies for your innovative technology.

Thanks! Good luck!

Sincerely,
KP

I24-1

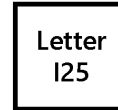
LETTER I24 KIMBERLY PETALCORIN

January 10, 2024

I24-1

The commentor provides several suggestions for the New Zoo including having eco-friendly operation, Summer Kids Camp, animal enclosures with 360 degree views, bamboo forest theme, rainforest theme, overnight accommodation, and large waterfalls. The commentor suggests partnering with tech companies for innovative technology.

Page 2-40 of the Draft EIR includes a summary of sustainability improvements that would be implemented for the New Zoo including being certified LEED Silver, installing solar panels, being a no natural gas facility, and constructing electric charging vehicle parking spaces. Similar to the Sacramento Zoo the New Zoo would continue to have summer camps for children. The New Zoo would be designed to provide enhanced visitor experience allowing viewing for people of all ages and abilities. As included in Table 2-1 in Section 2, "Project Description," of the Draft EIR the New Zoo would include an overnight camp lawn and overnight guest suites. This comment is noted.



From: [Gregoria Ponce](#)
To: [Christopher Jordan](#)
Subject: Zoo
Date: Saturday, February 10, 2024 2:35:14 PM

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[EXTERNAL EMAIL]

I want the zoo here. It will bring much needed space for the animals, expand the social culture of our beautiful city, and a regional attraction.

I 125-1

I understand there may be h2o quality issues? Can there be sedimentation basins or bioswales or another balanced means?

I 125-2

Thank you

[Sent from Yahoo Mail on Android](#)

LETTER I25 GREGORIA PONCE

February 10, 2024

I25-1 The commenter states a desire to have the New Zoo in Elk Grove, highlighting anticipated benefits like additional space for animals, cultural expansion, and becoming a regional attraction.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

I25-2 The commentor states concerns about potential water quality issues and suggests possible solutions such as sedimentation basins or bioswales.

Please refer to Response I8-1 related to water quality. As stated on page 2-17 of the Draft EIR the "Project would utilize hydromodifications on the site to account for storage and water quality treatment prior to discharging into the City's storm drain infrastructure, proposed along B Drive. Features would include bioretention basins, Low Impact Development (LID) principles, and treatment control measures permitted within the Sacramento Regional Stormwater Quality Design Manual."

From: Predeep <sandhup87@gmail.com>
Sent: Thursday, February 1, 2024 11:37 AM
To: Zoo Project <zoo@elkgrovecity.org>
Subject: EG Zoo

[Some people who received this message don't often get email from sandhup87@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

[EXTERNAL EMAIL]

To Whom It May Concern:

I have a question regarding the proposed zoo in EG. As you know there are many houses (built and coming in the future) near this location. What is, if any, the noise ordinance for the zoo to not disturb citizens living in this area? In particular, homes south of Kyler Rd. What kind of noises are expected from the animals. Will they put in a different area during closed hours? If project is approved, how long do you anticipate the construction to take for it to be fully built?

I26-1

I would appreciate your response to this.
-Predeep Sandhu

Sent from my iPhone

LETTER I26 PREDEEP SANDHU

February 1, 2024

I26-1

The commenter states concern about potential noise disturbances for residents near Kyler Road. The commenter inquires about the existing noise ordinance, seeking clarification on expected animal noises and whether there are plans to address this issue during closed hours. The commenter is interested in understanding the anticipated construction timeline if the project receives approval.

The commenter is referred to Section 3.11, "Noise," of the Draft EIR. Pages 3.11-16 through 3.11-27 describe the Project's impacts from construction noise and operational noise (including animal noise). Please refer to Response I22-4 related to noise impacts from the Project. The existing masonry wall along the residences on Lotz Parkway would reduce construction noise that would occur from 7:00 a.m. to 7:00 p.m. Operational and animal noise would be reduced given their distance from the residences along Lotz Parkway and the existing masonry wall.

Letter
127

From: [Jan Quesenberry](#)
To: [Christopher Jordan](#)
Subject: Zoo
Date: Tuesday, January 16, 2024 8:41:34 PM

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[EXTERNAL EMAIL]

Mr. Jordan, I am in favor of building the new Elk Grove zoo at the Kammerer Rd. site. Building a smaller zoo in Elk Grove Park would be a waste of money.

127-1

Janet Quesenberry

LETTER I27 JANET QUESENBERRY

January 16, 2024

127-1

The commenter states that they are in favor of the New Zoo in Elk Grove and believe building a smaller zoo in Elk Grove Park would not be an appropriate use of funds.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
I28

From: [Tom and Debbie Rutsch](#)
To: [Christopher Jordan](#)
Subject: Comments on Draft EIR for new Zoo
Date: Monday, February 5, 2024 11:08:25 AM

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[EXTERNAL EMAIL]

The Draft EIR is well written and comprehensive. The impacts are not significant and mitigated when possible. The zoo would be a great asset to the City of Elk Grove and surrounding communities.

Tom Rutsch
5038 Willow Vale Way
Elk Grove, CA 95758

I
I28-1

LETTER I28 TOM RUTSCH

February 15, 2024

I128-1

The commenter states that they are in support of the New Zoo in Elk Grove and the great assets it would bring the City and surrounding communities.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
129

From: [City of Elk Grove](#)
To: [Christopher Jordan](#); [Christal Love-Lazard](#); [Darrell Doan](#); [Kristyn Laurence](#); [Luis Aguilar](#)
Subject: Zoo Comment Submission
Date: Thursday, January 11, 2024 11:33:03 AM

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[EXTERNAL EMAIL]

Submitted on Thu, 01/11/2024 - 11:32

Submitted by: Anonymous

Submitted values are:

Name
Jennifer Sallee

Email
jsallee57@comcast.net

Phone
[916-682-1076](tel:916-682-1076)

Comments/Questions

I think the entire zoo plan that has been presented at several meetings is outstanding. I only wish it could be even bigger. I know I don't live next door to the proposed zoo, but the possible drawbacks of noise and traffic should not be any worse than all the noise and traffic that occur every day in Elk Grove. Besides, the way things are going, if there isn't a zoo at this site, pretty soon it will just be solid tract houses with all the noise, pollution, & traffic that solid rows of houses bring. If I lived nearby, I would buy a yearly pass and walk there everyday. Since the proposed zoo, would be closer to where I live, I would certainly go there more often than I go the current zoo with its horrible traffic and lack of parking. Please don't let this wonderful opportunity die. At some point the totally dysfunctional city of Sacramento will just let the current zoo wither away.

I29-1

LETTER I29 JENNIFER SALLEE

January 11, 2024

I129-1

The commenter states that they are in support of the New Zoo in Elk Grove and highlights the potential benefits of having a zoo in the proposed location, expressing a preference for its convenience over the current zoo with traffic and parking issues.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
130

From: [Genevive Taylor](#)
To: [Christopher Jordan](#)
Cc: [Rick Jennings](#); [Beverly S Boido](#); [Michelle Bell](#); [Genevive Taylor](#)
Subject: Re: Sacramento Zoo Move to Elk Grove- Not Vetted
Date: Thursday, February 8, 2024 9:30:48 AM
Attachments: [image001.png](#)

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[EXTERNAL EMAIL]

Good morning Chris-

I understand the exit of the ZOO, as the ZOO Board is looking for greener pastures and EG is a growing, vibrant city with much more access to ZOO expansion and keeping with the rules/regulations of ZOOs. Yes, the Land Park Zoo is small and restricted and little to no room for many of the large animals, etc. I would only hope the ZOO Board can be more vocal and informational in the proposed move to EG and to also suggest or assist in the future of the existing ZOO location, as I had asked or suggested a Children's ZOO, aka-a small ZOO. This ask also includes more info. sharing with the Land Park Community Association, the Council Member for Land Park and a mailer for all who, like me, are very concerned.

130-1
130-2

Thank you-Art

On Thursday, February 8, 2024 at 09:01:10 AM PST, Christopher Jordan <cjordan@elkgrovecity.org> wrote:

Hell Mr. Taylor,

Thank you for your email. Since the existing Zoo site in Land Park, along with the totality of the William Land Park complex, is the property and responsibility of the City of Sacramento, the City of Elk Grove would have no role in determining future use for the site. You would need to contact the City of Sacramento for details as to their intent with the site if the relocation to Elk Grove is approved by the Elk Grove City Council.

I am aware that there were multiple efforts over the years to study expansion of the current site in Land Plan, along with relocation to other sites in the City of Sacramento and the City never selected a strategy. Again, I'd need to defer to the City of Sacramento on any outreach they conducted on that process with the Land Park Neighborhood Association and others in the Land Park area when those studies were prepared.

Christopher



Christopher J. Jordan, AICP (he/him)

Director of Strategic Planning and Innovation

City Manager's Office

City of Elk Grove

8401 Laguna Palms Way, Elk Grove, CA 95758

Phone: 916.478.2222

TTY/TDD 888.435.6092

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From: Genevive Taylor <semperfitaylor@sbcglobal.net>

Sent: Tuesday, February 6, 2024 10:31 PM

To: Christopher Jordan <cjordan@elkgrovecity.org>

Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>

Subject: Sacramento Zoo Move to Elk Grove- Not Vetted

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[EXTERNAL EMAIL]

Greetings Christopher-

I am interested in finding out more information on the Sacramento Zoo move to Elk Grove. I understand some of the reasons, but am not happy with the fact that

Land Park and Sacramento Residents have not been able to be aware, in the loop, notified or given a presentation that I can remember. It was more like an announcement

on TV and of course, NO mention of what is happening with the Zoo property, once the Animals are gone.

Also, no word from the Land Park Community Association or any updates from our Council Member regarding the proposed move. I would hope, since the Sacramento Zoo is the central focus of William Land Park (WLP) and the Amusements that reside in WLP, that there would be a mention of what is planned to fill the void of NO Zoo?

I can only suggest that if the Sacramento Zoo leaves that there can be a Children's or Smaller Zoo, as what Folsom and Lodi have. Attached is the info. I received from

a friend, tonight.

<https://elkgrovelagunaneews.com/2024/02/06/elk-grove-to-hold-public-meeting-on-sacramento-zoo-relocation-february-6-2024/>

•

Thank you-

Art Taylor

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission.

Certain information that you provide us is subject to disclosure under the California Public Records Act or other legal requirements. This means that if it is specifically requested by a member of the public, we are required to provide the information to the person requesting it. We may share personally identifying information with other City of Elk Grove departments or agencies in order to respond to your request. In some circumstances we also may be required by law to disclose information in accordance with the California Public Records Act or other legal requirements.

LETTER I30 ART TAYLOR

February 8, 2024

I130-1

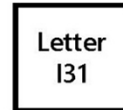
The commentor states that the New Zoo Board should be more vocal and informative about the proposed move to Elk Grove, and suggests active involvement in shaping the future of the existing location.

As stated on page 2-4 of the Draft EIR, "the Sacramento Zoo site would remain under the jurisdiction of the City of Sacramento." The reuse of the current Sacramento Zoo site in Land Park is thus not within the jurisdiction of Elk Grove or the Sacramento Zoological Society. The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

I30-2

The commentor states that they would like to see Children's Zoo at the existing location and advocates for more comprehensive information sharing with the Land Park Community Association, the Council Member for Land Park, and concerned community members.

As stated on page 2-4 of the Draft EIR, "the Project does not include repurposing of the existing Sacramento Zoo site in the City of Sacramento. The Sacramento Zoo site would remain under the jurisdiction of the City of Sacramento." The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.



From: tom
To: Christopher Jordan
Subject: Opposing the elk Grove zoo.
Date: Thursday, February 8, 2024 5:38:42 PM

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[EXTERNAL EMAIL]

As someone who lives in the community near Krammer road. I would ask for the zoo not be approved.

131-1

The amount of added traffic would not be welcomed.

The smell of the animals and poop would be overwhelming.

131-2

LETTER I31 TOM

February 8, 2024

I31-1

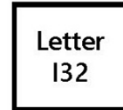
The commenter expresses opposition approval of the New Zoo due to anticipated increased traffic. They emphasize that the additional traffic would be unwelcome in the community.

As stated on page 3.13-1 of the Draft EIR, "Pursuant to Senate Bill (SB) 743, Public Resources Code (PRC) Section 21099, and California Code of Regulations (CCR) Section 15064.3(a), generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and a project's effect on automobile delay shall no longer constitute a significant impact under CEQA. Therefore, the transportation analysis herein evaluates impacts using VMT and does not include level of service (LOS) analysis." Therefore, impacts from the New Zoo on traffic were not analyzed in the Draft EIR. Please refer to Section 3.13-1, "Transportation," of the Draft EIR for an analysis of Project VMT impacts.

I31-2

The commenter raises concerns about the potential overwhelming smell of animals and their waste.

As stated on page 3.2-24 of the Draft EIR, "Two compostable animal waste and five non-compostable animal waste low boys or hoppers would located at the New Zoo. Two collector areas at the northeast and northwest portions of the site would include a 20 yard dumpster for animal waste compost and three hoppers for trash, recycling, and compost. Animal waste would be picked up every one to two days. However, SMAQMD has not received an odor complaint from zoo activities at the Sacramento Zoo since commencing operations (Carter, pers comm., 2023). The Project involves development of a New Zoo in Elk Grove that would generate odors similar to those generated at the existing Sacramento Zoo. Based on the nonexistent complaint history of the Sacramento Zoo, the Project would likely not generate odors or other emissions that would adversely affect a substantial number of people. The main source of odors at the New Zoo would be animal waste, which would be picked up and trucked off the site several times a week."



From: [Karen Trinkaus](#)
To: [Christopher Jordan](#)
Subject: Sacramento zoo expansion
Date: Thursday, February 8, 2024 9:24:29 AM

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[EXTERNAL EMAIL]

I'm all for it! I have three kids and live off Waterman. Very excited about the prospect of a more local zoo.

132-1

Karen Trinkaus

LETTER 132 KAREN TRINKAUS

February 8, 2024

1132-1

The commenter, with three children living off of Waterman, states that their family is excited to have the New Zoo in Elk Grove.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

Letter
133

From: [Gregory Uba](#)
To: [Christopher Jordan](#)
Subject: Comments on Zoo coming to Elk Grove
Date: Thursday, February 8, 2024 7:24:57 PM

You don't often get email from gregoryuba@gmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

I would like to see it be more than a traditional zoo.

Things I would like to see include:

1. IMAX type theater featuring movies about animals, conservation, climate change, etc
2. An ENVIRONMENTAL ACTION Center/Bookstore that would provide opportunities to engage in advocacy... Perhaps with support from one or more environmental organizations.
3. An ART Room? Where visitors can draw, paint animals. Display visitor art/student art/senior art?
4. An area where visitors can learn about extinct and endangered animals and environmental efforts to preserve biodiversity...
5. An INSECT Pavilion? If I remember correctly, the San Francisco Zoo has a nice insect house.
6. Instead of a tram, maybe bike, e-bike, scooter rentals?
7. An animal rescue/rehabilitation program.
8. An animal view exhibit where visitors can experience a simulated animal eye view of their environment... For example a burrowing animal... A tree dwelling animal...

133-1

I think the FOOD Court should feature foods from the locales of the animals as well as vegetarian and vegan food with an explanation of carbon footprint impact on animals in the world.

I think the parking area should include EV Charging area, priority parking for carpools. I would like to see solar panels that do double duty as shaded parking spaces... The City of Santa Monica has something like this at their City Hall I think.

133-2

Gregory Uba
9395 Bennoel Way
Elk Grove 95758

LETTER I33 GREGORY UBA

February 8, 2024

I133-1

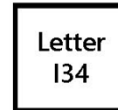
The commenter states that they would like the New Zoo to contain several untraditional features such as an IMAX theater, Environmental Action Center, Art Room, education on extinct and endangered animals, Insect Pavilion, e-bike and scooter rentals, animal rescue program, animal simulation experience, and food from the locales of the animals.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.

I133-1

The commentor states that the Project should include electric vehicle (EV) charging, priority parking for carpools, and solar panels to shade parking.

As stated on page 2-40 of the Draft EIR the New Zoo would include 327 EV parking spaces consisting of 313 EV capable spaces, 80 EV charging stations, 7 EV standard accessible spaces, 2 EV van accessible spaces, and 5 EV ambulatory spaces. A minimum 20-kilowatt (kW) solar array would be installed on the proposed retail building and a minimum 14-kw array would be installed on the proposed office building. The Giraffe Lodge building would not have solar panels but would be photovoltaic (PV) ready. As included in Table 3.13-4 of the Draft EIR vehicle miles traveled reduction measures to support carpooling would not be feasible for the Project.



From: Moua Vang
To: Christopher Jordan
Subject: Elk Grove Zoo
Date: Wednesday, January 10, 2024 9:16:54 AM

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[EXTERNAL EMAIL]

To Whom it May Concern,

We are an Elk Grove resident residing at the Sterling Meadows community and would like to vote against developing a zoo at the current planned location. Our concern is that if the zoo has to go through phases, it may never fully develop into what its meant to be due to lack of funding. Also, the traffic it would create for the surrounding communities. In short, we do not need or want a zoo.

I34-1
I34-2

Thank you
Mo

Sent from Yahoo Mail on Android

LETTER I34 MO VANG

January 10, 2024

- 1134-1 The commentor states that they oppose the New Zoo because with the phased development the zoo may never fully realize as intended potential due to potential funding shortages. The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.
134-2 The commentor states they are concerned about the traffic impact on surrounding communities. Please refer to Response I30-1 related to traffic from the New Zoo. This comment is noted.

Letter
I35

From: [Linda Hnub Ci Xiong](#)
To: [Christopher Jordan](#)
Subject: Elk Grove residents
Date: Friday, February 9, 2024 7:03:16 AM

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[EXTERNAL EMAIL]

Please build a little water park area to cool off in the summer! That would be so much fun for the kids. Animals and a little bit of water splash. Not asking for a lot just a little area where it's sprinklers and the kids can walk through it and splash

I
135-1

Linda Xiong

LETTER I35 LINDA XIONG

February 9, 2024

I135-1

The commentor proposes the addition of a water park area (space with sprinklers) for children to walk through and cool off during the summer at the New Zoo.

The comment does not address the adequacy of the EIR analysis, and no further response is required. This comment is noted.