CITY OF ELK GROVE
GENERAL PLAN UPDATE
FINAL ENVIRONMENTAL IMPACT REPORT

SCH No. 2017062058

Prepared by:

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

JANUARY 2019

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1.0 Introduction

1.1 PURPOSE AND BACKGROUND

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

1.2 PROJECT UNDER REVIEW

1.2.1 PROJECT ANALYZED IN THE DRAFT EIR

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

- **General Plan Update.** The General Plan and implementing programs serve as the blueprint for future growth and development. The General Plan would provide for the future development of approximately 48,102 housing units, as well as the creation of approximately 77,339 jobs.

- **Climate Action Plan Update.** The updated Climate Action Plan (CAP) will include an updated community-wide emissions inventory for Elk Grove, along with updated emissions forecasts for 2020, 2030, and 2050 based on land use activities anticipated with implementation of the updated General Plan.

- **Specific Plan Actions.** To implement the policies and programs proposed in the General Plan update, the Project includes changes to the East Elk Grove Specific Plan, the East Franklin Specific Plan, and the Laguna Ridge Specific Plan.

- **Zoning Code Amendments.** To maintain consistency with the updated General Plan, the Project also includes a number of amendments to the Zoning Code.

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

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

1) Provide for growth of the City to meet long-term needs, including housing, employment, and recreational opportunities.

2) Facilitate orderly and logical development, including economic development, while maintaining the character of existing communities.

3) Provide an improved transportation system that includes an array of travel modes and routes, including roadways, mass transit, walking, and cycling.

4) Protect open space, providing trails, parkland, and a range of recreational opportunities.

5) Provide mechanisms to minimize noise and safety risks associated with natural and human-caused noise and safety hazards.

6) Promote sustainability and community resiliency through reductions in vehicle miles traveled, improved air quality, reductions in energy usage, and a diversified economy.

7) Provide and support public facilities and infrastructure with sufficient capacity to adequately serve the needs of the growing community.

1.3 TYPE OF DOCUMENT

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

1.4 PUBLIC PARTICIPATION AND REVIEW PROCESS

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

NOTICE OF PREPARATION AND INITIAL STUDY

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

DRAFT EIR PUBLIC NOTICE/PUBLIC REVIEW

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

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

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

1.5 ORGANIZATION OF THIS DOCUMENT

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

The Final EIR is organized as follows:

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

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

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

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

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2.0 ERRATA

2.1 INTRODUCTION

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

2.2 CHANGES AND EDITS TO THE DRAFT EIR

EXECUTIVE SUMMARY

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

> Prior to LAFCo approval of annexation of any portion of the Planning Area into the City of Elk Grove ~~for which the SCWA would be the retail provider for water service~~, the City must prepare the Plan for Services to allow LAFCo to determine that: (1) the requirement for timely water availability, as required by law, is met; (2) its water purveyor is a signatory to the Water Forum Successor Effort and that groundwater will be provided in a manner that ensures no overdraft will occur, (3) the amount of water provided will be consistent with the geographical extent of the annexation territory; and (4) existing water customers will not be adversely affected. The Plan for Services shall be sufficient for LAFCo to determine timely water availability to the affected territory pursuant to Government Code Section 56668, subdivision (l), or its successor.
>
> The Plan for Services shall demonstrate that the ~~SCWA~~ water supplies are adequate to serve the amount of development identified in the annexation territory, in addition to existing and planned development under normal, single-dry, and multiple-dry years. The Plan for Services shall depict the locations and approximate sizes of all on-site water system facilities to accommodate the amount of development identified for the specific annexation territory; demonstrate that the service provider ~~SCWA~~ has annexed the territory into its service area; and demonstrate that adequate ~~SCWA~~ off-site water facilities are available to accommodate the development identified in the annexation territory, or that fair-share funding will be provided for the construction of new or expanded treatment and/conveyance facilities and/or improvement of existing off-site water system facilities with no adverse fiscal impacts on existing ratepayers.

1.0 INTRODUCTION

No changes were made to this section.

2.0 PROJECT DESCRIPTION

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

3.0 DEMOGRAPHICS

No changes were made to this section.

4.0 LAND USE

No changes were made to this section.

5.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

No changes were made to this section.

5.1 AESTHETICS, LIGHT, AND GLARE

No changes were made to this section.

5.2 AGRICULTURAL RESOURCES

No changes were made to this section.

5.3 AIR QUALITY

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

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

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

> SMAQMD has developed guidance based on EPA's Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality. In April 2017, SMAQMD published the Landscaping Guidance for Improving Air Quality Near Roadways (Landscape Guidance) to provide recommendations to projects constructed within the Sacramento Valley Air Basin in consideration of local climate and appropriate flora. SMAQMD developed the Landscape Guidance in coordination with the Sacramento Tree Foundation. Based on the information presented in the Landscape Guidance, the following recommendations could apply to the project to reduce exposure from mobile-source TAC emissions (SMAQMD 2017b).
>
> In light of the *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62Cal.4th 369, SMAQMD expanded its Guide to Air Quality Assessment in Sacramento County and published Recommendations for Siting New Project Near Existing Sources that Emit Odors and Toxic Air Contaminants. Recommendations to reduce TAC exposure that lead agencies could apply to development under the proposed Project include, but are not limited to, the following (SMAQMD 2017c):
>
> - identifying sources that emit TACs within 0.5-miles of a proposed project site,

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

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

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

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

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

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

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

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

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

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

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

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

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

5.4 BIOLOGICAL RESOURCES

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

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

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

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

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

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

Policy NR-2-~~3~~5: Ensure that trees that function as an important part of the City's or a neighborhood's aesthetic character or as natural habitat on public and private land are retained or replaced to the extent possible during the development of new structures, roadways (public and private, including roadway widening), parks, drainage channels, and other uses and structures.

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

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

5.5 CULTURAL RESOURCES

On page 5.5-15, mitigation measure

5.6 GEOLOGY, SOLIS, AND SEISMICITY

No changes were made to this section.

5.7 GREENHOUSE GAS EMISSIONS

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

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

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

5.8 HAZARDS AND HAZARDOUS MATERIALS

No changes were made to this section.

5.9 HYDROLOGY AND WATER QUALITY

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

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

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

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

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

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

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

5.10 NOISE

No changes were made to this section.

5.11 PUBLIC SERVICES AND RECREATION

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

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

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

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

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

California ~~Uniform~~ Fire Code

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

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

Fire Protection District Law of 1987

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

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

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

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

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

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

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

The following text is deleted from page 5.11-16:

~~Regional Park~~

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

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

5.12 PUBLIC UTILITIES

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

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

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

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

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

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

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

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

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

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

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

5.13 TRANSPORTATION

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

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

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

> Standard MOB-3-2.a:
>
> Require ~~new commercial development for projects equal to and greater than 100,000 square feet to provide an electric vehicle charging station and~~ new one- and two-family dwelling units with attached private garages to ~~residential development to~~ be pre-wired for ~~plug-in~~ future installation of electric vehicle~~s~~ charging equipment. For new multi-family residential development, require at least 5% of required parking spaces to be EV capable, and for at least 50% of those EV-capable spaces to have necessary electric vehicle supply equipment to provide active charging stations.
>
> Standard MOB-3-2.b: For new office development projects, require at least 10% of required parking spaces to be EV capable, and for at least 50% of those EV-capable spaces to have necessary electric vehicle supply equipment to provide active charging stations. For other types of non-residential development, require at least 6% of required parking spaces to be EV capable, and for at least 50% of those EV-capable spaces to have necessary electric vehicle supply equipment to provide active charging stations.

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

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

6.0 OTHER CEQA CONSIDERATIONS

No changes were made to this section.

7.0 PROJECT ALTERNATIVES

No changes were made to this section.

8.0 REPORT PREPARATION

No changes were made to this section.

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Document Path: T:\Elk Grove\Maps\Morrison\Figure 3-4 Land Use Diagram.mxd 2/8/2019 9:28:46 AM

North Study Area

East Study Area

West Study Area

South Study Area

Legend

Planning

Sphere of Influence (portion beyond City Limits)

Elk Grove City Limits

General Plan Preferred Alternative

Commercial and Employment Land Use

- Community Commercial (CC)
- Regional Commercial (RC)
- Employment Center (EC)
- Light Industrial/Flex (LI/F)
- Light Industrial (LI)
- Heavy Industrial (HI)

Mixed Use Land Use

- Village Center Mixed Use (VCMU)
- Residential Mixed Use (RMU)

Public/Quasi-Public and Open Space Land Use

- Parks and Open Space (P/OS)
- Resource Management & Conservation (RMC)
- Public Services (PS)

Residential Land Use

- Rural Residential (RR)
- Estate Residential (ER)
- Estate Residential (ER-1) *1 acre*
- Estate Residential (ER-1) 1 acre with Community Commercial overlay
- Estate Residential (ER-1/4) *1/4 acre*
- Estate Residential (ER-1/4) 1/4 acre with Community Commercial overlay
- Low Density Residential (LDR)
- Low Density Residential (LDR) with Community Commercial overlay
- Medium Density Residential (MDR)
- High Density Residential (HDR)

Other Land Use

- Agriculture (AG)
- Study Area (SA)
- Tribal Trust Lands (TTL)

N

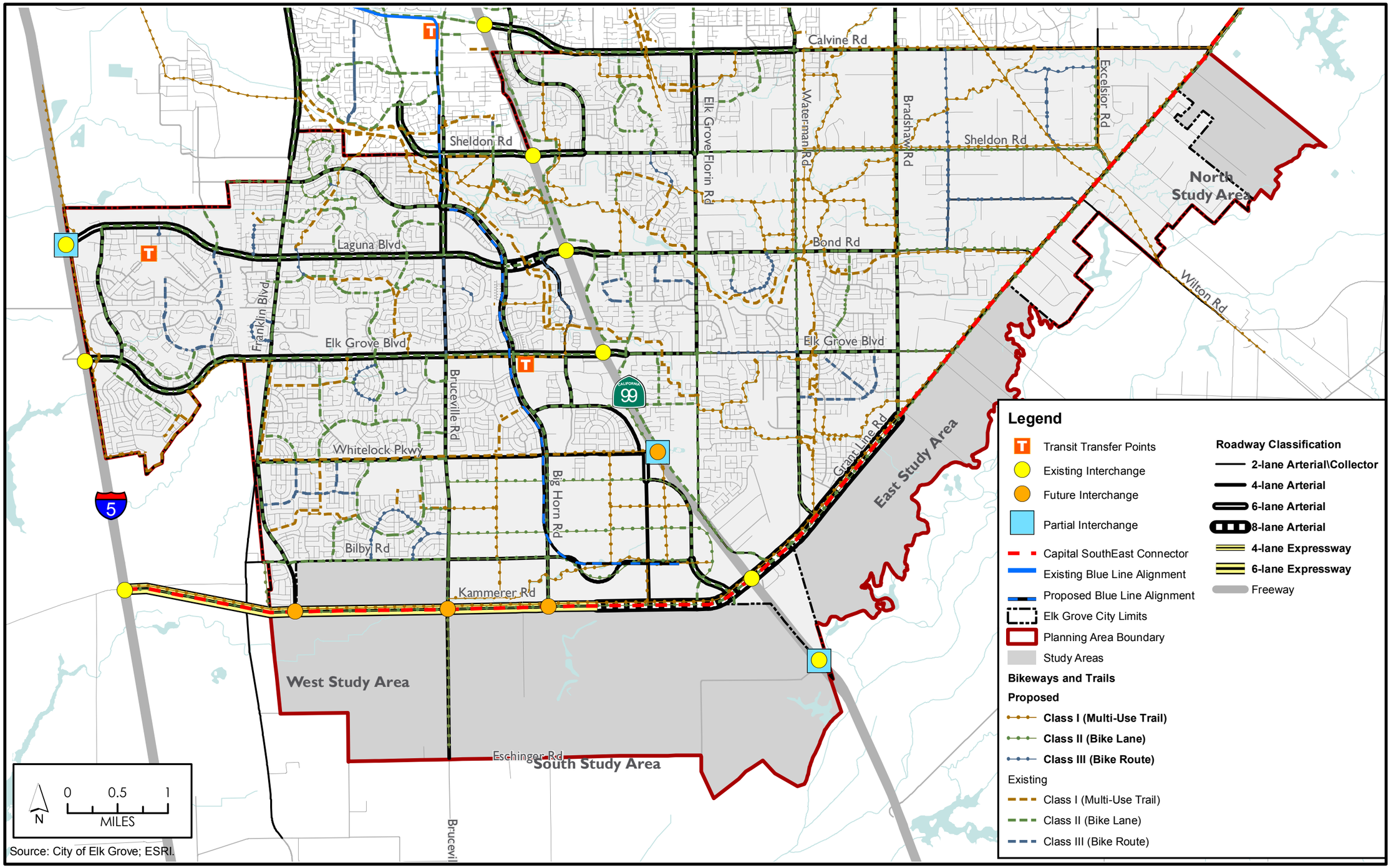
0 0.5 1 MILES

Source: City of Elk Grove; ESRI

City of Elk Grove
Development Services

Revised Figure 2.0-3

Preferred Alternative Land Use Map

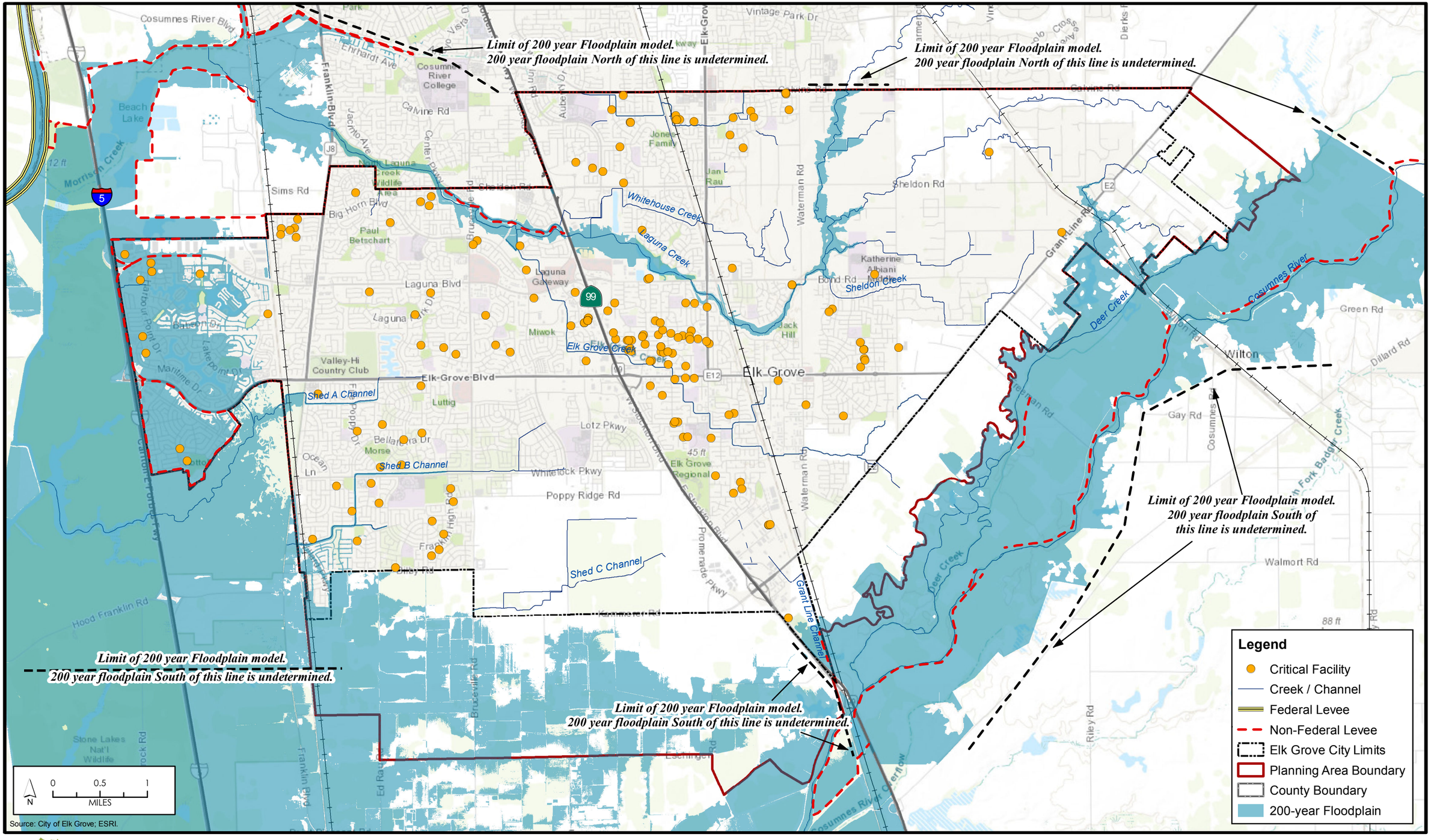


Source: City of Elk Grove; ESRI.

City of Elk Grove
Development Services

Revised Figure 2.0-4

Transportation Network Diagram



Source: City of Elk Grove; ESRI.

City of Elk Grove
Development Services

Revised Figure 5.9-3

200 year Floodplain

3.0 List of Commenters

3.1 LIST OF COMMENTERS

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

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

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4.0 COMMENTS AND RESPONSES

4.1 REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

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

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

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

4.2 COMMENTS RECEIVED AT THE PUBLIC WORKSHOP FOR THE DRAFT EIR

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

4.3 RESPONSES TO COMMENT LETTERS

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

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

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

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

Letter A

STATE OF CALIFORNIA

EDMUND G. BROWN JR., *Governor*

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

August 10, 2018

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

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

Dear Mr. Jordan:

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

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

Any development adjacent to or near the railroad (ROW) should be planned with the safety of the rail corridor in mind. New developments may increase pedestrian or vehicular traffic volumes not only on streets and at intersections, but also at nearby rail crossings. Traffic impact studies should analyze rail crossing safety and potential mitigation measures. Safety improvement measures may include the planning for grade separations or improvements to existing at-grade crossings. Examples of improvements may include, but are not limited to: addition or upgrade of crossing warning devices, detectable warning surfaces and edge lines on sidewalks, and pedestrian channelization. Pedestrian and bicycle routes should be designed to clearly prohibit and discourage unauthorized access (trespassing) onto the tracks, except at authorized crossings. **A-1**

In addition, modifications to existing public crossings require authorization from the Commission. RCEB representatives are available for consultation on any potential safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: http://www.cpuc.ca.gov/crossings. **A-2**

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

Sincerely,

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

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

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

Response A-1:

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

Response A-2:

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

Letter B

COSUMNES FIRE DEPARTMENT

10573 E Stockton Blvd.
Elk Grove, CA 95624

(916) 405-7100
Fax (916) 685-6622
www.yourcsd.com

September 24, 2018

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

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

Dear Mr. Jordan:

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

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

Page 8-36

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

Page 8-39

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

Page 8-40

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

B-1

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

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

B-1 cont.

Page 8-41

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

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

Respectfully,

Michael W. McLaughlin, CFO

Michael W. McLaughlin, CFO
Fire Chief

Attachment: 0511_PublicServices-CFD Comments

Letter B continued

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

5.11.1 FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES EXISTING SETTING

Cosumnes Community Services District Fire Department

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

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

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

B-2

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Letter B continued

Wildland Fire Hazards

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

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES REGULATORY FRAMEWORK

State

California Occupational Safety and Health Administration

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

California Fire Code

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

California Health and Safety Code

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

The Fire Protection District Law of 1987

B-2 cont.

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Letter B continued

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

Local

Elk Grove Municipal Code Chapter 16.85 Elk Grove Fire Fee

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

Elk Grove Municipal Code Chapter 17.04 California Fire Code

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

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES IMPACTS AND MITIGATION MEASURES

Standards of Significance

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

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

Methodology

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

General Plan Policies and Standards

B-2 cont.

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Letter B continued

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

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

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

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

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

B-2 cont.

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

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

Project Impacts and Mitigation Measures

Fire Protection and Emergency Medical Services

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

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

Letter B continued

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

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

Existing Regulations and Standards and Proposed General Policies That Provide Mitigation

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

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

Conclusion

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

Mitigation Measures

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Letter B continued

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

General Plan Update Draft Environmental Impact Report

City of Elk Grove July 2018

5.11-4 5.11 PUBLIC SERVICES AND RECREATION

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

Cumulative Setting

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

Cumulative Impacts and Mitigation Measures

Cumulative Impacts to Fire Protection and Emergency Medical Services

Impact 5.11.1.2

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

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

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

B-2 cont.

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Letter B continued

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

Mitigation Measures

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

B-2 cont.

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

Response B-1:

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

Response B-2:

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

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

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

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

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

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

California ~~Uniform~~ Fire Code

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

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

Fire Protection District Law of 1987

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

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

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

COSUMNES
PARKS RECREATION FIRE
CSD

PARKS AND RECREATION DEPARTMENT

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Letter C

September 26, 2018

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

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

Dear Mr. Jordan,

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

1) Project Objectives (Pg.2.0-2) – The CSD supports the objectives which address parks and recreation items including: **C-1**
   a) Objective 1) Provide for growth of the City to meet long-term needs, including… recreational opportunities.
   b) Objective 3) An improved transportation system including walking and biking options.
   c) Objective 4) Protect open space, providing trails, parkland, and a range of recreational opportunities.

2) Vision Principle - Sustainable and Healthy Community – Clean, Green Practices & Healthy Living (Pg. 2.0-9) – The City's "healthy living" vision principle is consistent with the vision statement developed as part of the 2018 CSD Parks and Recreation Master Plan: *An inclusive and connected park, recreation, and trails system that delivers opportunities for health and wellness, social interaction, and delight to the Elk Grove community*. The CSD envisions working cooperatively with the City to make the healthy living vision a reality. **C-2**

3) 5.11.4 Parks and Recreation (Pg. 5.11-14 to 5.11-23)
   a) CSD Overview (P.5.11-14 to 5.11-15) – The first sentence at the bottom of Pg. 5.11-14 should be updated with the underlined text: The CCSD provides parks and recreation services to the City <u>and in the CCSD boundaries</u> through its Parks and Recreation Department. **C-3**

   The information in this section correctly notes the CSD provides parks and recreation services in the community, the CSD plans and designs new parks, the City and the CSD joint goal of 5 acres active parkland per 1,000 residents, the CSD provision of recreation services for all ages, and the City-CSD Memorandum of Understanding for park and recreation facilities addressing funding, programming, construction, ownership, and maintenance in the City limits. **C-4**

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

Letter C continued

The "Regional Park" category (P.5.11-16) has been removed from the updated PDP. This category is not used in the CSD park system. If a Regional Park was proposed in the future, criteria would be developed using input from all involved entities. **C-5**

b) Parks and Recreation Master Plan (Pg.5.11-19) – The DEIR correctly notes:
   i) The Master Plan is a joint document prepared and approved by the CSD and the City.
   ii) The Master Plan was developed to guide both agencies in providing parks and recreation opportunities.
   iii) The Master Plan establishes clear direction for the CSD's core services and responsibilities. The CSD Master Plan included input from 2,275 people, ensuring that CSD direction for parks and recreation will match needs and desires of the community. **C-6**

c) General Plan Policies and Standards (Pg.5.11-20 to 5.11-21) – The overall direction of policies is consistent the 2018 CSD Parks and Recreation Master Plan. The importance and value of joint coordination between the City and CSD is recognized through specific phrases: "Work in conjunction with the CSD", "Work with the CSD", and "Coordinate with the CSD." **C-7**

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

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

Sincerely,

Fred J Bremerman

Fred Bremerman
Project Manager

Letter C – Fred Bremerman, Cosumnes CSD Parks

Response C-1:

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

Response C-2:

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

Response C-3:

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

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

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

Response C-4:

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

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

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

Response C-5:

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

> ~~Regional Park~~
>
> ~~Regional parks serve a large area of several communities, residents within a city or county, or across multiple counties. Depending on activities within a regional park, users may travel as many as 60 miles for a visit. Regional parks include recreational opportunities such as soccer, softball, golf, boating, camping, conservation wildlife viewing, and fishing. Although regional parks usually have a combination of passive areas and active facilities, they are likely to be predominantly natural resource-based parks.~~
>
> ~~Regional parks are commonly 100 to 1,000 acres, but some can be 2,000 to 5,000 acres in size. A regional park focuses on activities and natural features not included in most types~~

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

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

Response C-6:

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

Response C-7:

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

Response C-8:

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

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

Letter D

Susan Bell
Chief Facilities Officer
Facilities and Planning

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

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September 26, 2018

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

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

Dear Mr. Jordan:

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

Requested Correction on Page 5.11-10

Please correct the text of the paragraph below as shown.

Elk Grove Unified School District Funding

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

D-1

General Comments on Pages 5.11-10 to 5.11-14

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

D-2

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

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

D-2 cont.

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

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

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

Regards,

Kim Williams

Kim Williams
Planning Manager

Letter D – Kim Williams, Elk Grove Unified School District

Response D-1:

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

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

Response D-2:

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

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

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

Letter E

Office of Planning and Environmental Review
Leighann Moffitt, Director

County Executive
Navdeep S. Gill

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

September 26, 2018

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

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

Sincerely,

Tim Hawkins
Environmental Coordinator

COUNTY OF SACRAMENTO

Inter-Department Correspondence

September 17, 2018

TO: Kurtis Steinert
Office of Planning and Environmental Review

FROM: Matthew Darrow MGD
Department of Transportation

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

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

1. **Transportation Analysis Guidelines, Figure 4** – Several of the roadways shown on this figure appear to indicate roadway classifications different than those identified on the Sacramento County General Plan. Does the City plan to change classifications on these roads with this update? For example, Bradshaw Road is identified as a 6 lane thoroughfare in the County and through the City. This plan shows a 4 lane facility. Calvine Road east of Waterman Road is identified as a 6 lane thoroughfare in the current County General Plan. This update shows it as a 4 lane facility. Elk Grove Florin Road is shown as a 6 lane thoroughfare between Sheldon and Bond on the County General Plan. This update shows a 4 lane facility. Elk Grove Boulevard east of Waterman shows something different on the County General Plan as opposed to what this plan shows. Also, there doesn't seem to be any indication of the Connector JPA expressway identified along Grant Line Road. It seems like the Connector should be identified on the City General Plan.

2. **City of Elk Grove General Plan Update DEIR July 2018 FINAL, Figure 5.13-10** – See comment 1.

3. **City of Elk Grove General Plan Update DEIR July 2018 FINAL, Figure 5.13-13** – Many of the roads mentioned in comments 1 and 2 don't operate at acceptable levels of service. Does the City plan to "downgrade" these roads even though this is the case?

4. **Elk Grove General Plan Public Review Draft FINAL 07.25.18, Figures 3-6 and 3-7** - See comments 1 and 2.

5. **General** – If the City is planning to "downgrade" the various roads mentioned in comment 1 there will be potential for negative traffic impacts, including degradation of levels of service

E-1

Letter E continued

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

E-1 cont.

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

MGD

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

Letter E – Tim Hawkins, Sacramento County

Response E-1:

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

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

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

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

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Letter F

September 26, 2018

SENT VIA EMAIL

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

RE: City of Elk Grove General Plan 2018 Update

Dear Mr. Jordan:

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

F-1

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

General Plan Policy Document Comments

1. We recommend that a reference to our State Implementation Plan (SIP) be included with the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) in **Policy LU-3-26, Criteria 4**.

2. We appreciate policies, such as **MOB-3-10, MOB-3-11 and MOB-4-3** that prioritize the safety of the most vulnerable user first in the design and planning of roadways. Policies that prioritize pedestrian and bicyclist safety support reducing the use of single-occupancy vehicles which reduces vehicle miles traveled (VMT). Additionally, we appreciate the narrative connecting the environment, human health and accessible transportation options for **Goal MOB-4 Active Transportation for All**.

F-2

3. **Standard MOB-3-2.a** requires installation of electric vehicle charging stations for new commercial development projects equal to and greater than 100,000 square feet. We strongly recommend the City expand the standard to require EV charging stations at all

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

Letter F continued

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

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

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

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

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

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

F-2 cont.

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

10. In addition to the reference to the California Air Resources Board (CARB) guidance, we request the City add a general reference to the most recent version of SMAQMD's Guide to Air Quality Assessment in Sacramento County and the SMAQMD's Mobile Sources Air Toxics (MSAT) Protocol[2] to **Policy NR-4-9**. We recognize the MSAT Protocol was not available until recently, but it contains exposure reduction measures that align with the General Plan's health protective measures.

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

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

13. We recommend adding the most recent version of our Landscaping Guidance for Improving Air Quality near Roadways[3] and the Sacramento Tree Foundation's tree list to

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

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

Letter F continued

support the development of the City's tree list in **Implementation Strategy Action 12.1 Urban Forestry**. As mentioned above, also consider developing an urban forestry master plan that outlines optimal plantings for urban and non-urbanized areas. **F-2 cont.**

DEIR Comments

1. In the bulleted list on **page 5.3-27**, we recommend including SMAQMD's Landscaping Guidance for Improving Air Quality near Roadways and SMAQMD's Recommendations for Siting New Projects Near Existing Sources that Emit Odors and Toxic Air Contaminants.[4] SMAQMD's landscape guidance was developed in cooperation with the Sacramento Tree Foundation to provide local guidance and best practices for installing vegetative barriers between major roadways and sensitive receptors. **F-3**
2. The first sentence under the Stationary Sources section on **page 5.3-27** should be updated to clarify that the distances are specified by CARB, not SMAQMD. The DEIR language used to reference **Policy NR-4-9** is not consistent with the policy language in the General Plan. **F-4**
3. The first sentence in the paragraph above the Conclusion section on **page 5.3-28** should remove "…*or land uses that include nonpermitted sources (e.g., truck distribution yards).*" Please note that SMAQMD does not apply the 10 in a million threshold to nonpermitted sources of toxic air contaminants. **F-5**
4. The second paragraph, lines 3-4, of the Mitigation Measures section on **page 5.3-28** should remove "…*to levels below the SMAQMD's thresholds of significance*." Please note that SMAQMD does not apply the 10 in a million threshold to nonpermitted sources of toxic air contaminants. **F-6**
5. In order for us to reconcile the data reported in **Table 5.3-5**, please provide additional clarification on the scaling methods used in the air quality analysis and include the updated CalEEMod model outputs, if necessary. **F-7**

TA Guidelines Comments

1. We commend the City for being the first jurisdiction in Sacramento County to incorporate Senate Bill (SB) 743 (Steinberg, 2013) and VMT analysis into its General Plan. Since VMT is directly linked to greenhouse gas (GHG) emissions and criteria air pollution, reducing VMT represents an important component in meeting clean air and GHG reduction goals.
2. In order to ensure consistency between the TA Guidelines and the VMT mitigation programs in **CAP Measure TACM-6**, we recommend including a reference to the CAP on: **F-8**
   - **page 4** of the VMT Analysis section, by adding the underlined language below: *"…Projects with VMT exceeding the established limits that are unable to reduce VMT through reduction strategies identified in Table 12:*
     1. May be required by the City to demonstrate clear community benefit, within the context of the General Plan and consistent with the Climate Action Plan; and…"
   - **page 29** within the Reduction Strategies (Mitigation).

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

[4] Sacramento Metropolitan Air Quality Management District. Recommendations for Siting New Projects Near Existing Sources that Emit Odors and Toxic Air Contaminants (May 2017) http://www.airquality.org/LandUseTransportation/Documents/ExistingOdorsToxicsRecommendationsFinal5-12-17.pdf

Letter F continued

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

F-8 cont.

CAP Comments

1. On page 1-2 of the Introduction, we recommend the use of the term complementary rather than complimentary.
2. In the last paragraph of page 2-5, we recommend the City consider mentioning that wildfire smoke contributes to decreased economic activity, as people tend to avoid venturing outside for shopping, recreational, and other non-essential activities. Scientific evidence suggests that there could be 42,000 deaths related to wildfire smoke by 2050.[7]
3. On page 2-7, line 4, it is not clear which report or study "the new study" references.
4. In light of recent developments, the discussion of federal measures on page 2-10 appears to be incomplete. It may be better to either 1) provide more context and explanation of how lawsuits over the Federal EPA's new rulemaking on fuel economy standards and the Clean Power Plan would play out in the near term; or, 2) omit altogether.
5. We are encouraged that the City is on track to meet its 2020 GHG emissions target based on its 2013 inventory and plans to update its inventory every three years beginning in 2018 to ensure that it is still on target. The regional housing and jobs

F-9

[5] State of California. Governor's Office of Planning and Research. Technical Advisory on Evaluating Transportation Impacts in CEQA (April 2018)
http://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf

[6] California Air Resources Board. Updated Final Staff Report on the Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, p.15 and p.35 (February 2018)
https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf

[7] American Geophysical Union. Wiley Online Library. *Future Fire Impacts on Smoke Concentrations, Visibility, and Health in the Contiguous United States* (July 6, 2018)
https://agupubs.onlinelibrary.wiley.com/doi/full/10.1029/2018GH000144

Letter F continued

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

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

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

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

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

F-9 cont.

7. The cost analysis for each CAP measure does not adequately account for potential revenue or other benefits and co-benefits to either the City or the public. Both measures that require no investment and those that generate a profit are categorized the same way, as "Negligible" on page 4-2, failing to distinguish positive-revenue measures from no-cost ones. Highlighting measures that either bring in revenue or increase net benefits provide a more complete picture for the public and decision makers to consider. Similarly, it would be beneficial to create the distinction between minimal costs and net positive gains for private investments. Finally, costs and benefits do not necessarily cancel out; for example, it may cost $2 million to reduce the risk of developing asthma and lung cancer for 172,000 people, but the City may choose to make that investment. Highlighting public and private direct and co-benefits – such as increased property values – could be helpful to build support for CAP implementation.

8. For measure **BE-2 Upgrade Residential Appliances in Existing Development,** we recommend including a discussion of SMUD's new incentives to upgrade homes to use all-electric appliances and systems, including water heaters, dryers, cooking range, and HVAC systems. Eliminating the use of natural gas in energy systems is a critical part of decarbonizing the energy system, as natural gas is itself a greenhouse gas. We also recommend broadening the focus from solar water heaters alone to including other options, such as high-efficiency heat pump water heaters.

Letter F continued

9. The City should consider incorporating energy conservation education, resources, available rebates, etc., into required permitting processes, such as the process of obtaining a business permit to promote measure **BE-3 Nonresidential Appliances in Existing Development**. Additionally, the City should consider including education about SMUD's incentive for replacing high-GWP refrigerants with low-GWP alternatives. This is particularly relevant for businesses with refrigeration, such as gas station stores, corner stores and convenience stores, supermarkets, food-manufacturers and processors.

10. For measure **BE-4 Encourage or Require Green Building Practices in New Construction,** we recommend the City provide additional incentives or streamlining to encourage developers to build all-electric homes, on top of SMUD's existing incentive for new all-electric homes for builders. All-electric homes are safer and cleaner than homes with natural gas – which contain formaldehyde and VOCs – and can reduce the risk of pipeline and at-home leaks. Additionally, all-electric homes are less expensive to construct and may create a more affordable housing stock. The City could work in partnership with SMUD to host demonstration and education events for developers and the public on the efficiency of heat pumps, induction ranges, and smart homes.

11. Please provide more details for **BE-6 Encourage or Require Green Building Practices in Existing Buildings** on how the City plans to provide information, education, and encouragement on energy efficiency improvements for renovations. It is critical to provide this information early so that businesses and residents can factor these improvements into project budgets, timelines, and designs. We suggest that the City define thresholds above which renovations must meet CALGreen Tier 1 standards, such as a percentage of total area or building value, so that there is clear-cut guidance.

12. Consider taking a more technology-neutral approach for measure **BE-7 Solar Photovoltaics and Solar Water Heating in Residential and Commercial Development** that could include high-efficiency heat pump water heaters (which could still be solar-powered).

13. We recommend prioritizing the alternatives listed in measure **RC-2 Organic Waste Reduction** by the alternatives that obtain the most GHG reductions.

14. As requested in comment 4 on the General Plan Policy Document (above), in support of **TACM-2 Transit-Oriented Development**, we request the City to amend the zoning code (as part of Implementation Measure 1.1) to prohibit land use types within ¼ mile of a major transit station that are not transit supportive. Examples of auto-oriented uses include drive-through restaurants and services, car washes, and gas stations. Transit-oriented development should focus on people-oriented uses such as employment, housing, shopping, and dining.

15. In regards to the target indicators in measure **TACM-5 Affordable Housing**, please clarify if the 2030 target of 4,000 homes below market value is in addition to the 2020 target of 3,000 affordable housing units.

16. We commend the City for developing **TACM-6 Achieve a 15 percent reduction in daily VMT compared to existing conditions (2015) for all new development in the City, consistent with state-mandated VMT reduction targets for land use and transportation projects** and its actions items, specifically, the fee based mitigation program to offset project-level and cumulative VMT impacts from projects, with funding

F-9 cont.

Letter F continued

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

17. We support the specific actions defined under measure **TACM-6 Limit Vehicle Miles Traveled** to reduce VMT and appreciate the thresholds defined by the City to support the measure. The City should review the effectiveness of the VMT thresholds annually to ensure continued progress toward VMT reductions and include an update in its scheduled CAP update in 2024.

18. For measure **TACM-9 Install EV Charging Stations** we recommend the City consider innovative strategies to support multi-modal EV charging (including both light and heavy duty vehicles), as well as chargers that can support public and private fleet use, general public use, and use by transportation network companies and car-share operators. This measure is also supportive of **General Plan Policy MOB-3-2 and Standard MOB-3-2a.**

19. We are excited about measure**TACM-8 Tier 4 Final Construction Equipment** due to the co-benefits of criteria and toxic air contaminant reductions. We strongly encourage the City to include TACM-8 in General Plan Policy NR-4-8 along with all the other construction related emissions reducing policies.

20. Overall, we appreciate the level of detail in **Chapter 5** regarding CAP implementation measures and actions items, including the formation of an intra-agency Climate Action Team comprised of CAP Liaisons from City departments, the CAP Development Review Checklist, and quarterly monitoring of the CAP progress.

21. We recommend including a specific timeframe for **Implementation Measure 2, Actions 2.1 and 2.2** for integrating the CAP Development Review Checklist into the City's current planning and development process.

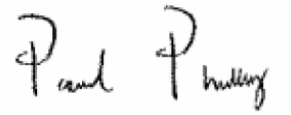
22. It is important for **Implementation Measure 3** that the City designate key staff within the Climate Action Team to be responsible for annual monitoring and reporting (action 3.5) before conducting actions 3.3 and 3.4, so the staff could participate in actions 3.3 and 3.4. It is not clear whether this numerical sequencing of events is also chronological.

23. The flowchart in Figure 5-1 shows the GHG Analysis Streamlining Process. As a general reminder, projects that fall within the CEQA exempt category in this flowchart may still be subject to an existing Air Quality Mitigation Plan and/or Greenhouse Gas Reduction Plan adopted prior to the City developing its CAP. The City must ensure these projects implement adopted reduction measures.

F-9 cont.

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

Sincerely,



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

Letter F continued

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

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

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

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

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

Response F-1:

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

Response F-2:

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

Response F-3:

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

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

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

> SMAQMD has developed guidance based on EPA's Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality. In April 2017, SMAQMD published the Landscaping Guidance for Improving Air Quality Near Roadways (Landscape Guidance) to provide recommendations to projects constructed within the Sacramento Valley Air Basin in consideration of local climate and appropriate flora. SMAQMD developed the Landscape Guidance in coordination with the Sacramento Tree Foundation. Based on the information presented in the Landscape Guidance, the following recommendations could apply to development projects to reduce exposure from mobile-source TAC emissions (SMAQMD 2017b).
>
> SMAQMD expanded its Guide to Air Quality Assessment in Sacramento County and published Recommendations for Siting New Project Near Existing Sources that Emit Odors and Toxic Air Contaminants. Recommendations to reduce TAC exposure that would lead agencies could apply to development under the proposed Project include, but are not limited to, the following (SMAQMD 2017c):
>
> - identifying sources that emit TACs within 0.5-miles of a proposed project site,

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

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

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

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

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

> _____. 2017a. CEQA Guidelines – Chapter 3, Construction-Generated Criteria Air Pollutant and Precursor Emissions. Accessed December 8, 2017. http://www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools.
>
> _____. 2017b (April). Landscaping Guidance for Improving Air Quality Near Roadways. Accessed October 20, 2017. http://www.airquality.org/LandUseTransportation/Documents/SMAQMDFinalLandscapingGuidanceApril2017.pdf.
>
> _____. 2017c (May). Recommendations for Siting New Projects Near Existing Sources that Emit Odors and Toxic Air Contaminants. Accessed October 20, 2018. http://www.airquality.org/LandUseTransportation/Documents/ExistingOdorsToxicsRecommendationsFinal5-12-17.pdf.

Response F-4:

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

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

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

Response F-5:

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

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

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

Response F-6:

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

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

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

Response F-7:

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

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

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

Response F-8:

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

Response F-9:

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

SMUD®

Sent Via E-Mail

September 25, 2018

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

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

Dear Mr. Jordan:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Environmental Impact Report (EIR) for the City of Elk Grove General Plan Update Project (Project, SCH 2017062058). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

G-1

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

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

G-2

Letter G continued

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

G-3

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

Sincerely,

Nicole Goi

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

Cc: Ashlen McGinnis

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

Response G-1:

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

Response G-2:

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

Response G-3:

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

Letter H

Sacramento Area Council of Governments

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September 26, 2018

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

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

Dear Mr. Jordan,

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

H-1

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

Letter H continued

to work with City of Elk Grove to determine if there is a need to update the project list and/or projections for the City in the 2020 MTP/SCS. H-1 cont.

SACOG is supportive of the City's efforts to grow jobs to balance the currently high ratio of housing to jobs. In addition to the quality of life benefits residents get when they have jobs and services close where they live, we know there is a strong connection between land use patterns, travel behavior, and air quality. Specifically, certain land use strategies, such as jobs-housing balance, lead to increased walking, biking, and transit use, shorter automobile trips, and reduced mobile-source air pollution. For the region to realize the vehicle miles travel reduction, congestion reduction, and air pollution reductions that the MTP/SCS achieves, it is important for communities that currently have a low ratio of jobs to housing, such as Elk Grove, to plan for and attract enough job growth over time to minimize the need for long-distance commuting out of the city. To ensure that the City implements the vision of the Draft General Plan, we would like to work with the City on adding strong, measurable, implementation-focused policies. Specifically, we recommend that the City include policies around the timing and phasing of the proposed "Study Areas." Policies that require phased growth encourage a complete neighborhood and can be used to help the City ensure its goal of more employment is being met before a significant number of new homes are added in this area. Examples of this type of policy could include timing and conditions for when development can occur in relation to the build out of the Southeast Policy Area, establishing thresholds for employment and/or neighborhood serving commercial that must be reached before additional housing growth can occur, or roadway usage metrics. We appreciate the discussions that we've had on this to date and would like the opportunity to work with the City in the coming months to incorporate such policies into the General Plan. H-2

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

This MTP/SCS update is connected to a Regional Housing Needs Allocation (RHNA) cycle as well. The Draft General Plan shows most of the City's current RHNA being accommodated in a concentration of land in the Laguna Ridge and Southeast Policy Area new growth areas. In light of the legislative changes of the 2017 State Housing Package, concentrating the sites in this way is likely to be problematic for the City because of the new "no net loss" provision. This provision stipulates that if a site identified for lower income units is built at market rate, or even at a lesser number of affordable units, the City must "identify and make available" a new site within 180 days. This would entail rezoning a different site to accommodate the lower-income units that could no longer be accommodated on the original site. We strongly recommend the City use the opportunity of the General Plan Update to add additional by-right multi-family sites in more locations throughout the City. H-3

It is evident from the Draft General Plan that the City is committed to, and supportive of, building transit service, including new bus rapid transit, light rail, and commuter rail options. In the draft document, Policy H-4

Letter H continued

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

H-4 cont.

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

H-5

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

Sincerely,

James Corless
Chief Executive Officer

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

Response H-1:

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

Response H-2:

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

Response H-3:

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

Response H-4:

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

Response H-5:

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

DEPARTMENT OF TRANSPORTATION
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Letter I

Making Conservation a California Way of Life.

September 26, 2018

Ref. SCH #2017062058

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

Dear Mr. Jordan:

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

Project Understanding

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

I-1

Impacts to SR 99 and I-5

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

I-2

Appropriate mitigation that alleviates congestion exacerbated by the project should be implemented. Policy MOB-7-5 states "Assist Caltrans in implementing improvements to Interstate 5 and State Route 99 within the City as outlined in the most recent Caltrans Transportation Concept Report (TCR)." Caltrans agrees with this statement. **I-2 cont.**

Specific Comments on the DEIR

- Policy MOB-7-5 cites the TCR as a standard to guide improvements to I-5 and SR 99. In addition to the TCR, location-specific and other circumstances may bring additional operational or design considerations that may inform the need for future improvements. Please include a note to this effect where the TCR is referenced for project identification. **I-3**
- Please review the Synchro files for the I-5/Hood Franklin interchange. The AM and PM peak hour left turning volumes from southbound I-5 appear to be too comparable, without accounting for volumes on reciprocal travel directions between AM and PM peak periods. **I-4**

I-5 Subregional Corridor Impact Mitigation Fee Program

We encourage the City to coordinate and contribute to future projects on the state highway system in Elk Grove. Such projects within the Elk Grove City limits include adding auxiliary lanes on SR 99, HOV Lanes on I-5, and improving ramp metering/other ITS elements throughout both corridors. These, and other similar projects, would help relieve congestion, increase transit efficiency, and improve travel time reliability. These projects to improve the state highway system are essential to residents of Elk Grove because of the significant number of work trips traveling to regional employment centers in Downtown Sacramento and Rancho Cordova, as illustrated in Figures 5.13-1 and 5.13-2. **I-5**

The proposed Project will also have significant impacts to the SR 99/Grant Line Rd and I-5/Hood Franklin Rd Interchanges. The SB SR 99/Grant Line Rd offramp and intersection will operate at LOS F in the AM and PM (as shown in the Transportation Impact Study for the Elk Grove Sphere of Influence Amendment and Multi-Sport Park Complex). The SB I-5/Hood Franklin Road offramp and intersection will be severely impacted by the proposed Kammerer Rd Extension, which is discussed further on in this letter. **I-6**

Kammerer Road Extension

Caltrans is working with the City of Elk Grove and the Capital SouthEast Connector Road Joint Powers Authority (JPA) with regard to the Kammerer Road extension and the existing I-5/Hood Franklin Road interchange. While we did not provide input specific to the Kammerer Road Extension in our comment letter for the Notice of Preparation for the General Plan Update EIR, we have been engaged in identifying appropriate approaches toward programmatic funding strategies for future phases of the Connector Road. The General Plan Update provides an excellent opportunity to synchronize the Kammerer Road Extension with the I-5 Subregional **I-7**

Corridor Impact Mitigation Fee Program, with an eye on the I-5/Hood Franklin interchange and mainline I-5. **I-7 cont.**

The General Plan Update DEIR

The DEIR forecasts the capacity for 25,208 new dwelling units within the Kammerer Road Corridor between I-5 and SR 99, in the West and South Study Areas. The JPA incorporated the appropriate land use assumptions based on available information on approved projects in their analysis for the I-5/Hood Franklin interchange. However, page 6.0-2 of the DEIR affirms the City's intent to annex and develop these areas, introducing approximately 14,542 dwelling units not accounted for in the analysis for the interchange, which forecasts 10,666 dwelling units within the corridor for design year 2044. **I-8**

Impacts and Mitigation

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

Specifically associated with the Kammerer Road Extension, Caltrans requires:

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

I-9

Phasing, Actuating Conditions and Funding Opportunities

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

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

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

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

I-9 cont.

Available Air Pollutant Emissions Avoidance

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

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

I-10

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

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

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

California Air Resources Board – DriveClean PEV Resource Center

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

California Public Utilities Commission – Zero-Emission Vehicles

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

I-10 cont.

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

Sincerely,

GARY S. ARNOLD
Special Projects and Sustainability Manager

cc: State Clearinghouse

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

Response I-1:

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

Response I-2:

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

Response I-3:

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

Response I-4:

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

Response I-5:

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

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

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

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

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

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

Response I-6:

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

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

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

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

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

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

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

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

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

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

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

Response I-7:

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

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

Response I-8

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

Response I-9

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

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

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

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

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

Response I-10

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

Letter J

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

September 26, 2018

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

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

Dear Mr. Jordan:

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

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

J-1

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

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

Letter J continued

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

J-1 cont.

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

Sincerely,

Erik Vink
Executive Director

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

Letter J – Erik Vink, Delta Protection Commission

Response J-1:

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

Letter 1

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

To: Christopher Jordan, AICP

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

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

Date: September 18,2018

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

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

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

Letter 1 continued

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

1. Draft EG General Plan, Page 7-30

Policy NR-1-9:
Encourage development clustering where it would facilitate on-site protection of woodlands, grasslands, wetlands, stream corridors, scenic areas, or other appropriate features such as active agricultural uses and historic or cultural resources under the following conditions and requirements.
~~*Except as provided below, clustering*~~. *Clustering* shall not be allowed in the Sheldon Rural Area.

- Urban infrastructure capacity is available for urban use. ~~*If clustering is allowed in the Rural Area, those properties shall be exempt from providing urban water and sewer connections in accordance with the policies of the Sheldon/Rural Area Community Plan (see Chapter 9).*~~

1-1

- On-site resource protection is appropriate and consistent with other General Plan policies.

- The architecture and scale of development are appropriate for and consistent with the intended character of the area.

- Development rights for the open space area are permanently dedicated and appropriate long-term management, with funding in perpetuity, is provided for by a public agency or another appropriate entity

2. Draft Environmental Impact Report, Page 5.2-17

Policy ~~NR-1-8~~ *NR-1-9*:
Encourage development clustering where it would facilitate on-site protection of woodlands, grasslands, wetlands, stream corridors, scenic areas, or other appropriate features such as active agricultural uses and historic or cultural resources under the following conditions and requirements. ~~*Except as otherwise provided, clustering*~~. *Clustering* shall not be allowed in the Sheldon Rural Area.

- Urban infrastructure capacity is available for urban use. ~~*If clustering is allowed in the Rural Area, those properties shall be exempt from providing urban water and sewer connections in accordance with the policies of the Sheldon/Rural Area Community Plan (see Chapter 9).*~~

1-2

- On-site resource protection is appropriate and consistent with other General Plan policies.
- The architecture and scale of development are appropriate for and consistent with the intended character of the area.
- Development rights for the open space area are permanently dedicated and appropriate long-term management, with funding in perpetuity, is provided for by a public agency or another appropriate entity.

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

Policy LU-3-7: Residential land uses in Residential Neighborhood Districts should meet the following guidelines:

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

1-3

Letter 1 – Shirley Peters, Greater Sheldon Road Estates HOA

Response 1-1:

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

Response 1-2:

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

Response 1-3:

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

Letter 2

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

September 25, 2018

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

The DEIR relied heavily upon the 2003 General Plan EIR and did not provide the referenced documents cited or the most current research available. The Final EIR needs to include in the appendix all referenced documents and information. **2-1**

The DEIR of the proposed General Plan update has numerous significant and unavoidable impacts which will require findings of overriding considerations **2-2**

Aesthetics, Light, and Glare:

1. The General Plan will encourage new development that could degrade the existing visual character or quality of the Planning Area (city). *My suggestion: Enhance Citywide Design Guidelines to stress higher architectural quality of new development consistent with the higher quality cities in the region.* **2-3**

2. Implementation of the General Plan will create new sources of daytime glare and nighttime sky glow. *My suggestion: Consider requirement for low pressure sodium lighting for all new development.* **2-4**

Agricultural Resources:

3. Development of farmland designated Important Farmland and/or covered under Williamson Act contract. *My suggestion: The loss of farmland is justified if the conversion is to accommodate projected housing needs in the region and Elk Grove should provide its fair-share. However, the FEIR needs to quantify the projected fair-share housing need of the region and acknowledge the growth-inducing policies that may result in Elk Grove providing more than its fair share to the detriment of farmland.* **2-5**

Letter 2 continued

Air Quality:

8. The FEIR needs to do a sampling of real time ambient air quality located in Elk Grove between Hwy 99 and I-5 along Elk Grove Blvd. **2-6**

Biological Resources:

9. Implementation of the General Plan could have adverse impacts on endangered, threatened, rare plants and animal species. *My comment: No further mitigation beyond state or fed regulations possible. However, the mitigation fee needs to be routinely evaluated as the cost of real estate land purchases increase over time.* **2-7**

Greenhouse Gas Emissions and Energy:

10. The City cannot meet the statewide greenhouse reduction targets for 2050. *My comment: Commit to regular updates of the Climate Action Plan and incorporate policies that exceed the minimum required state/federal requirements in order to have a competitive edge in receiving grants.* **2-8**

Hydrology and Water Quality:

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

12. The General Plan policies will increase demand for groundwater and could potentially interfere with recharge of the aquifer. My comment: see Item 15 **2-9**

Noise:

13. Implementation will result in significant increases in transportation noise along roadways. *My comment: Require noise buffering treatments along the noisiest roadways and incorporate as conditions of project approval as applicable. Budget capital funds to retrofit noise attenuation measures along with grants to improve quality of life along major existing roadways and other noise sources. Adopt state-recognized noise standards and methodology.* **2-10**

Public Services and Recreation:

14. Development will result in an increase of school-aged children and require new public school facilities which could have an impact on the environment. *My comment: The school district as Lead Agency will need to evaluate the impacts of all new proposed schools.* **2-11**

Letter 2 continued

Public Utilities:

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

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

2-12

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

Transportation:

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

2-13

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

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

2-14

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

2-15

The FEIR needs to include the Elk Grove City's Citizen Survey as this document includes the modes of transportation and traffic behavior of the residents. **2-16**

Safety:

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

The Suburban Propane Facility has been identified in many reports by the City of Elk Grove, Sacramento County, and Cosumnes Community Service District as a hazardous waste facility. **2-17a**

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

In May of 2015, CSD hired the firm of City Gate Associates to complete an assessment of services entitled "Technical Report Standards of Cover and Headquarter Services". Volume 2 of the Technical Report Standards of Cover and Headquarter Services Assessment identified the propane tanks as a "high/special risk occupancy". This was defined in the report as: *"Any facility, including without limitation, a structure, infrastructure, property, equipment or service, that if adversely affected during a hazard event may result in severe consequences to public health and safety or interrupt essential services and operations for the community at any time before, during and after the hazard"*. This report described the storage propane tanks as follows: *"Finally the District, just off Highway 99, has the largest propane storage facility west of the Mississippi"*. This document should be referenced in this FEIR. **2-17b**

In close proximity to the above propane storage tanks is the City of Elk Grove Household Hazardous Waste Facility. This facility needs to be assessed, identified, and addressed in the FEIR. The City of Elk Grove proposes and plans to expand the facility which will include increase truck transportation increasing the risks to the safety and well-being of the population in event of a natural accident or man-made caused. **2-17c**

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

Department of Homeland Security identified 64 of the highest risk urban areas in the country for possible terrorist attack. Sacramento/Elk Grove were identified in the second highest risk tier of 54 cities. As cited in the Elk Grove Citizen of December 2009 *"The 2009-10 federal Homeland Security Appropriations Bill, signed in late October, included a $750,000 Federal Emergency Management Agency (FEMA) earmark for an emergency operations center in Elk Grove. The center would be a communications hub used by various agencies to coordinate the response to a large-scale disaster. The funding will also provide for video cameras that would provide views of traffic at major intersections and roadways leading into and out of the city to relieve traffic congestion as well as* **2-17d**

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

2-17d cont.

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

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

2-17e

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

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

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

2-18

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

2-19

Letter 2 continued

The DEIR relied heavily upon the previous general plan EIR and did not research or include the most current research or study resources available. The FEIR needs to include or state within the document no other studies or research exists. More importantly for the safety of the community and future residents this FEIR needs to do so as the City of Elk Grove will not proactively approach intentional human caused hazards of terrorism. 2-20

The City of Roseville's 2016 Local Multi-Hazard Mitigation Plan broadly describes the risks associated with "human caused hazards" to include terrorism. The FEIR needs to take a proactive approach to risk assessment because Elk Grove's unique situation of having 24 million gallons of above ground propane storage served by a rail line. 2-21

Sincerely,

Lynn Wheat

Lynn Wheat

Wheat91@yahoo.com

Letter 2 – Lynn Wheat

Response 2-1:

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

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

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

Response 2-2:

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

Response 2-3:

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

Response 2-4:

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

Response 2-5:

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

Response 2-6:

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

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

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

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

Response 2-7:

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

Response 2-8:

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

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

Response 2-9:

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

Response 2-10:

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

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

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

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

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

Response 2-11:

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

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

Response 2-12:

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

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

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

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

Response 2-13:

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

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

Response 2-14:

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

Response 2-15:

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

Response 2-16:

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

Response 2-17a:

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

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

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

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

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

Response 2-17b:

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

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

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

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

Response 2-17c:

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

Response 2-17d:

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

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

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

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

Response 2-17e:

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

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

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

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

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

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

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

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

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

Response 2-18:

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

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

Response 2-19:

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

Response 2-20:

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

Response 2-21:

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

Letter 3

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

September 26th, 2018

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

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

Dear Mr. Jordan,

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

The Environmental Council of Sacramento (ECOS), a 501c3 organization, and Habitat 2020, the Conservation Committee of ECOS, are partner coalitions dedicated to protecting the natural resources and communities of the greater Sacramento region. ECOS-Habitat 2020 member organizations include: 350 Sacramento, Breathe California of Sacramento-Emigrant Trails, International Dark-Sky Association, Los Rios College Federation of Teachers, Mutual Housing California, Physicians for Social Responsibility Sacramento Chapter, Preservation Sacramento, Resources for Independent Living, Sacramento Housing Alliance, Sacramento Natural Foods Co-op, Sacramento Vegetarian Society, SEIU Local 1000, Sierra Club Sacramento Group, The Green Democratic Club of Sacramento, and the Wellstone Progressive Democrats of Sacramento, Sacramento Audubon Society, California Native Plant Society, Friends of the Swainson's Hawk, Save the American River Association, Save Our Sandhill Cranes, Sierra Club Sacramento Group, Friends of Stone Lakes National Wildlife Refuge, and the Sacramento Area Creeks Council.

3-1

Summary

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

3-2

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

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

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

3-2 cont.

Land Use, Transportation, Air Quality, and Climate Change

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

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

Letter 3 continued

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

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

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

3-2 cont.

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

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

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

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

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

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

3-2 cont.

Hydrology and Water Quality

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

3-3

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

3-4

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

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

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

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

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

3-4 cont.

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

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

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

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

3-4 cont.

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

Biological Resources

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

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

3-5

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

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

3-6

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

3-7

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

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

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

3-7 cont.

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

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

3-8

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

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

3-8 cont.

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

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

3-9

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

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

3-9 cont.

Impact on the South Sacramento Habitat Conservation Plan

Impact 5.4.6 states:

> Because the SSHCP has not been adopted or implemented at this time, there would be **no impact** related to potential conflicts with an adopted habitat conservation plan under existing conditions…
>
> The proposed West and South Study Areas, which total approximately 5,200 acres, are located outside the UDA and within PPU 6. Though future development in the West and South Study Areas would preclude the use of this area as mitigation lands in PPU 6, the mitigation for the loss of Swainson's Hawk foraging habitat, which would be required of all development projects in these areas, as well as mitigation for impacts for other biological resources, would contribute to the SSHCP's overall conservation goals. Thus, development allowed under the General Plan would not be inconsistent with the provisions of the SSHCP, if it is adopted.

3-10

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

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

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

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

3-10 cont.

Special Status Wildlife and the reliance on the CNDDB

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

3-11

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

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

3-11 cont.

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

Conclusion

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

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

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

3-12

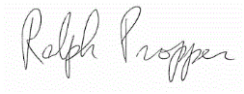
1. Elk Grove will not apply for or support applications for Sphere of Influence expansion until the necessary acquisitions to meet the conservation targets of the SSHCP for the sector in question are executed.

2. Elk Grove will not apply for or support applications for Sphere of Influence expansion until the area in question is identified by SACOG as a potential growth area that would be consistent with the MTP/SCS in meeting mandated regional GHG reductions and Air Quality Attainment.

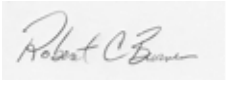
3. Elk Grove will not apply for or support applications for Sphere of Influence expansion an adequate water supply for the given area is demonstrable and *fully executed* under law.

Thank you for your consideration and the opportunity to comment.

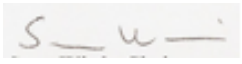
Sincerely,



Ralph Propper
ECOS Board President



Rob Burness
Co-Chair, Habitat 2020



Sean Wirth
Co-Chair, Habitat 2020

California Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
916-358-2900
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EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director

January 12, 2018

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

Dear Ms. Gill:

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

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

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

Sincerely,

Kevin Thomas
Acting Regional Manager

Attachment (1)

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

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

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

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

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

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Letter 3 continued

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California Department of Fish and Wildlife

Letter 3 continued

Attachment 1

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

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

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

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

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

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

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

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

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

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

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

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

The proposed property is adjacent to other protected habitat.

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

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

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

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

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

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

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

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

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

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

CDFW Analysis: Kamilos Project
January 12, 2018

Figure 1. Project Location

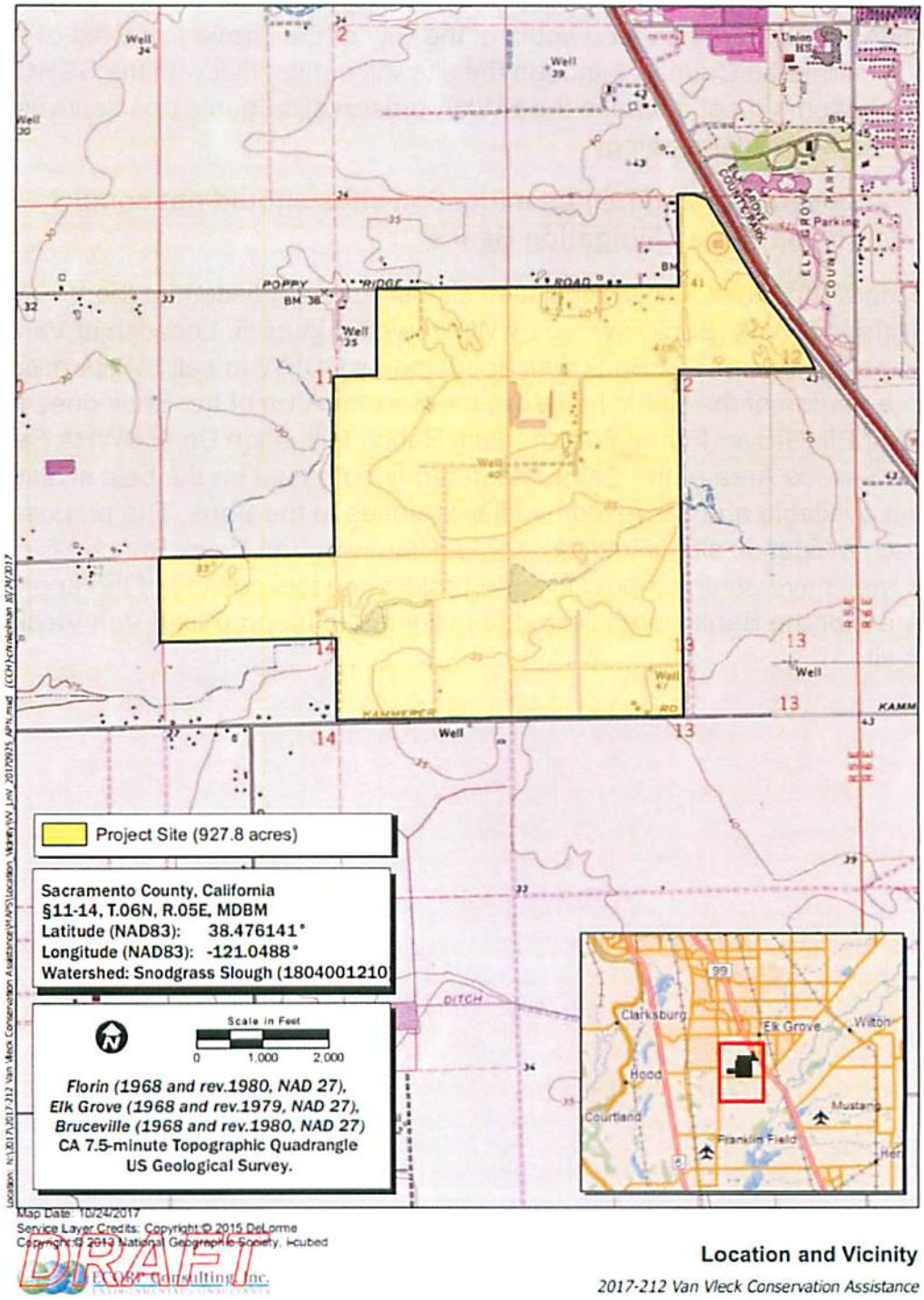
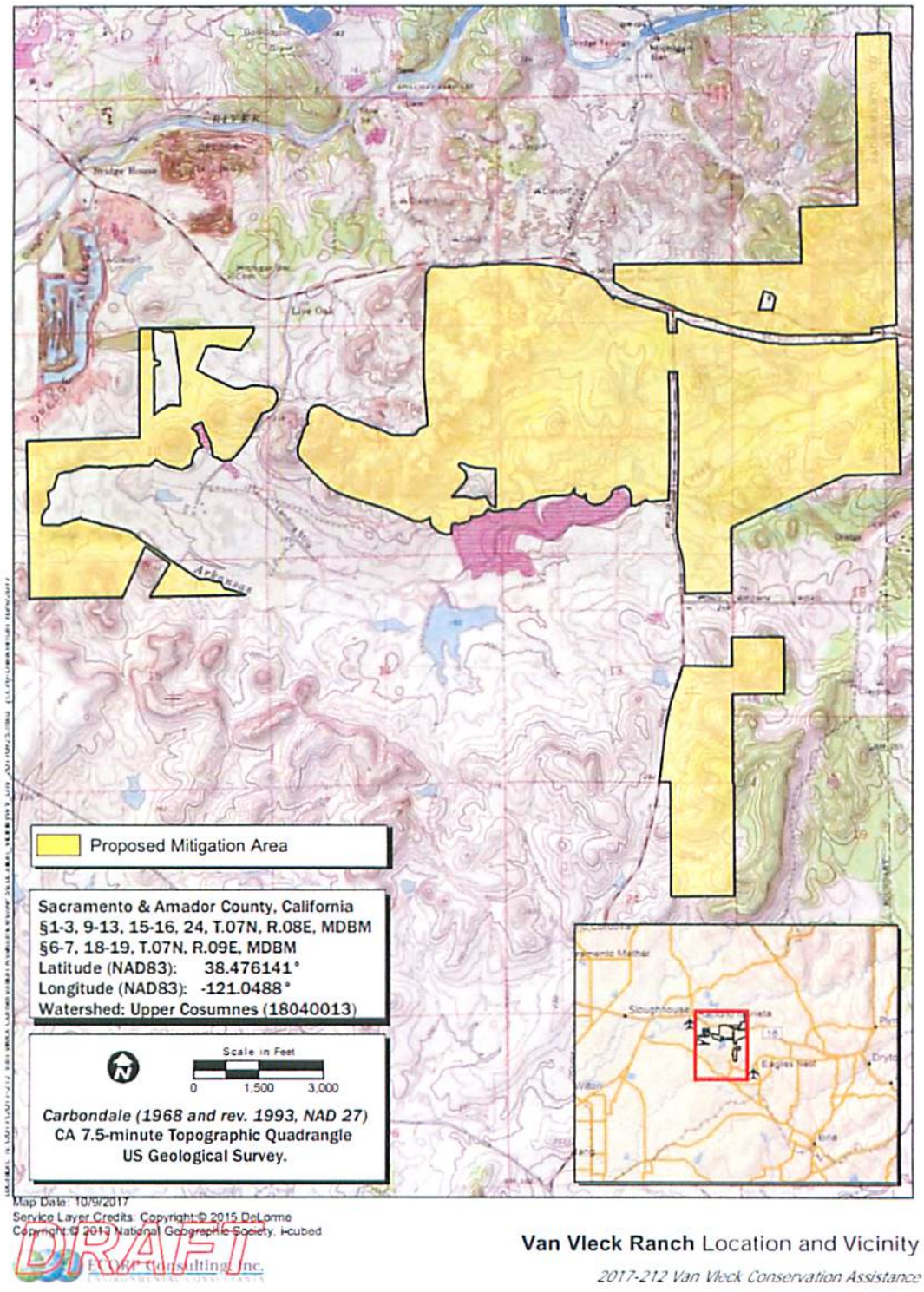


Figure 2. Proposed Mitigation Area



Van Vleck Ranch Location and Vicinity

2017-212 Van Vleck Conservation Assistance

Figure 3. SWHA Foraging Habitat at Van Vleck

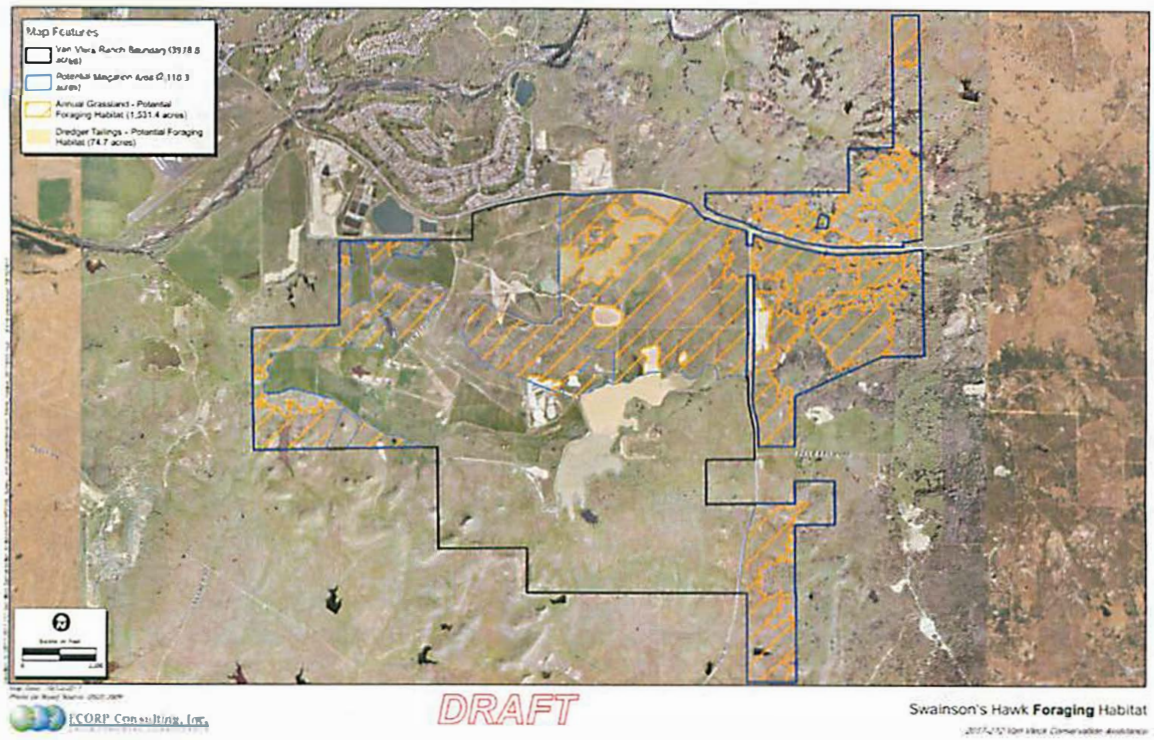


Figure 4. SWHA Nesting Distribution near Van Vleck Ranch

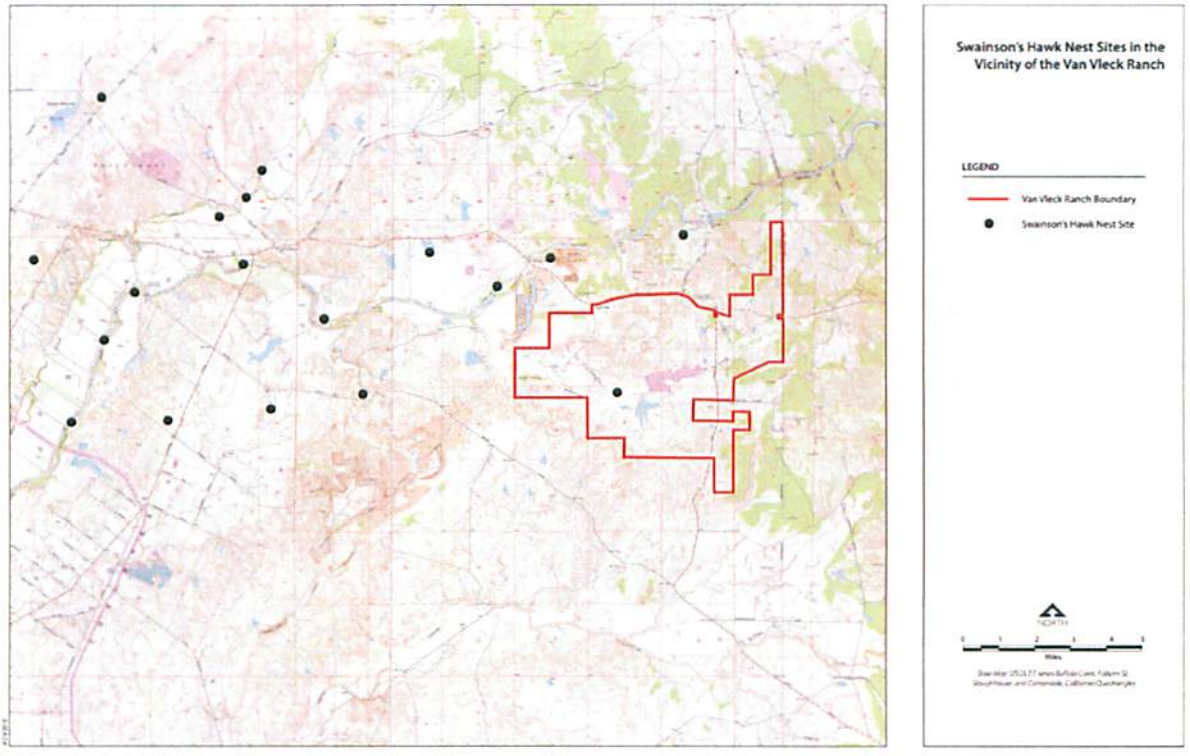
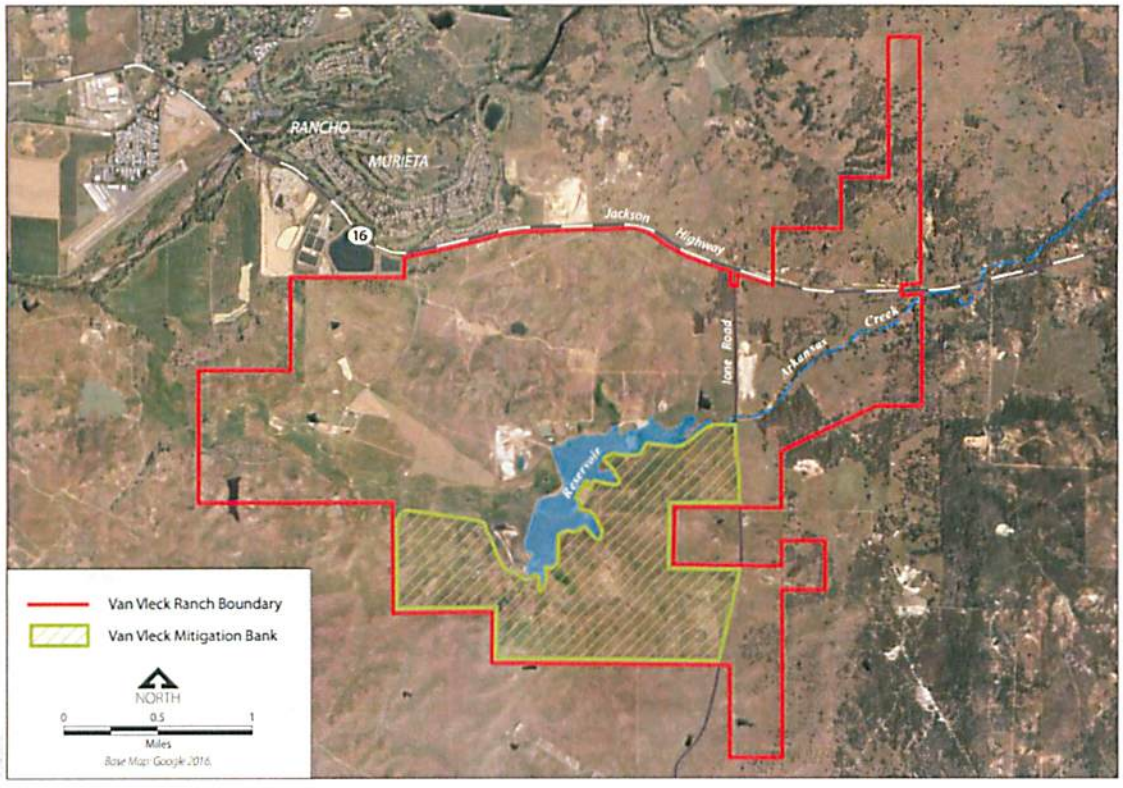
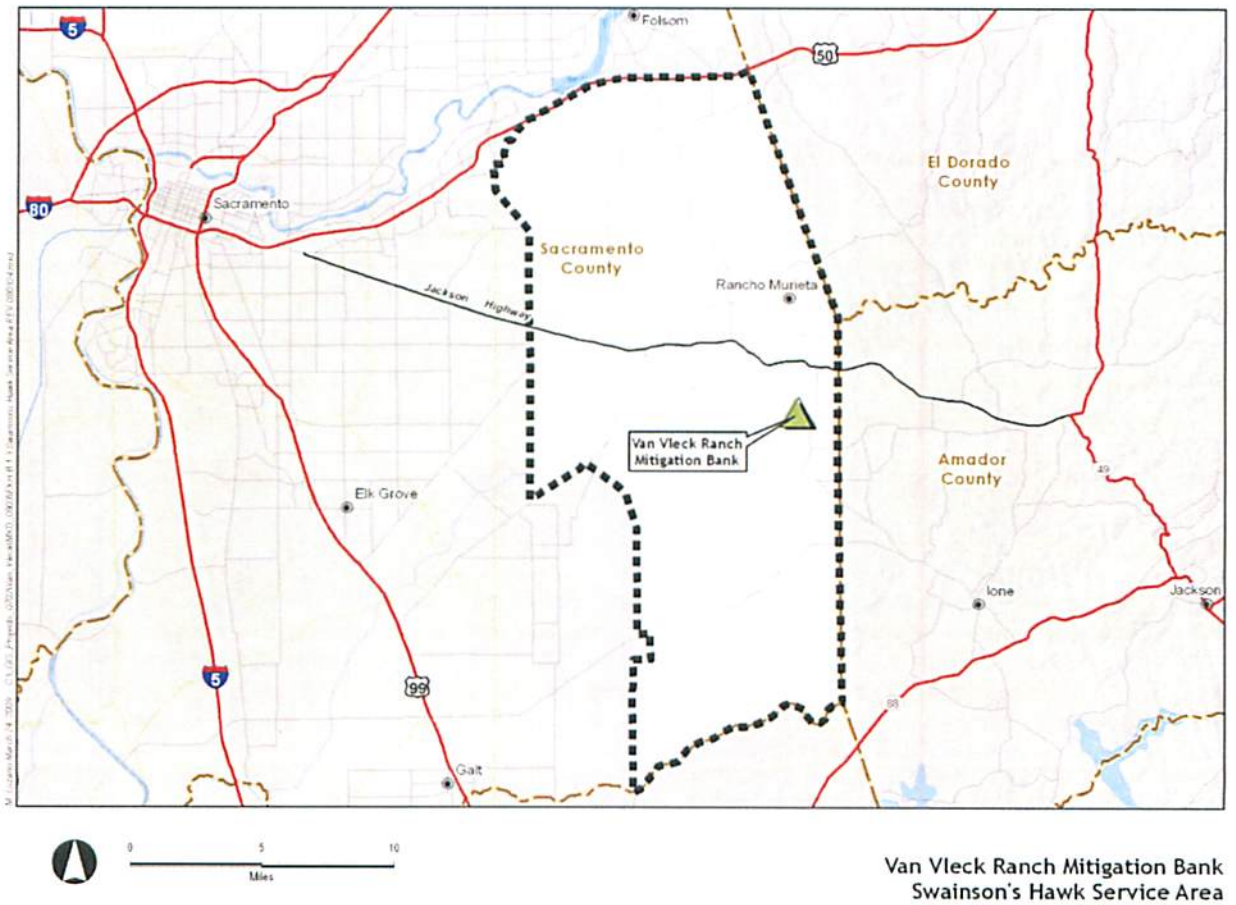


Figure 5. Location of Van Vleck Mitigation Bank



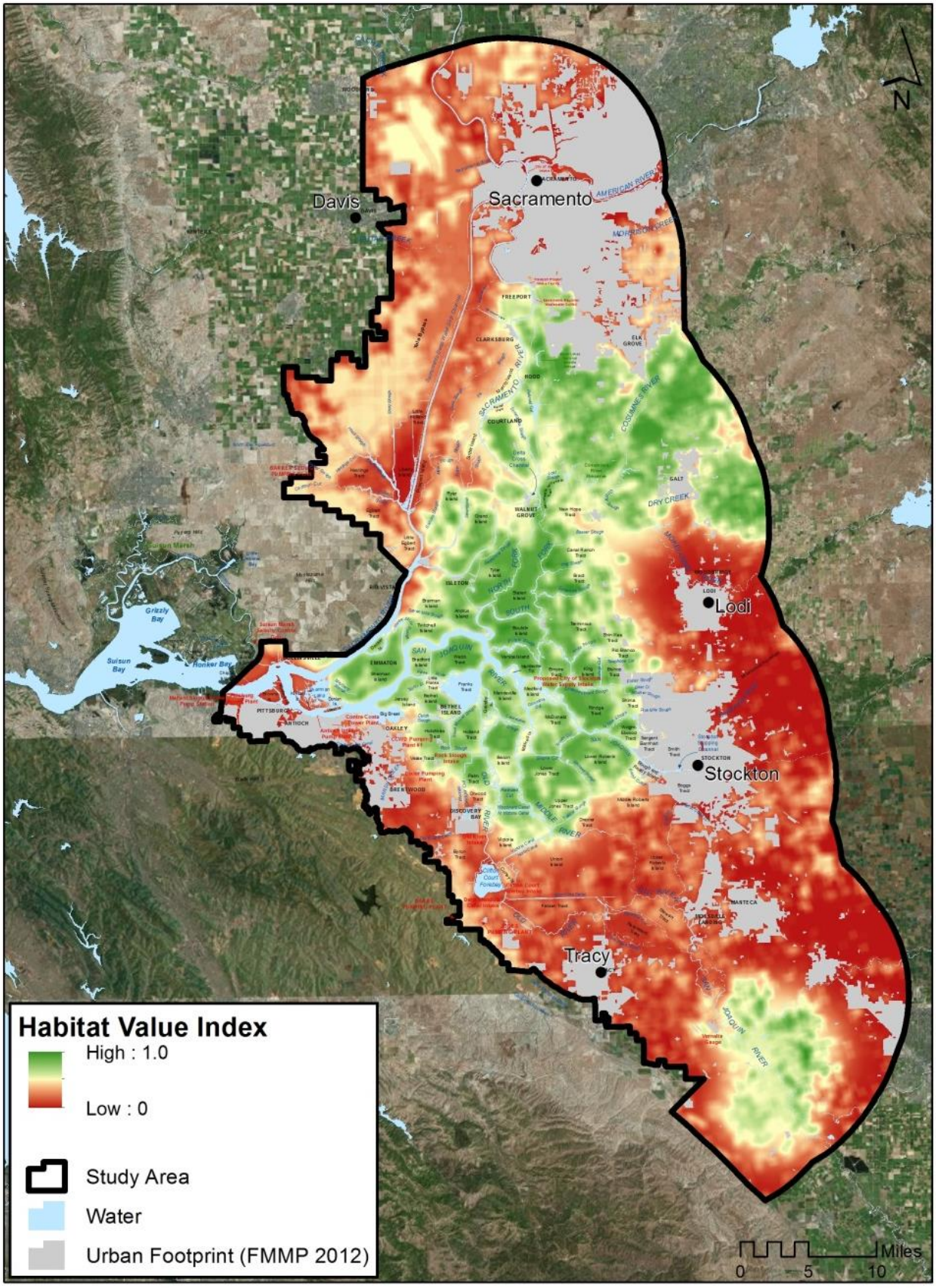
Van Vleck Ranch

Figure 6. Van Vleck Ranch Mitigation Bank SWHA Service Area

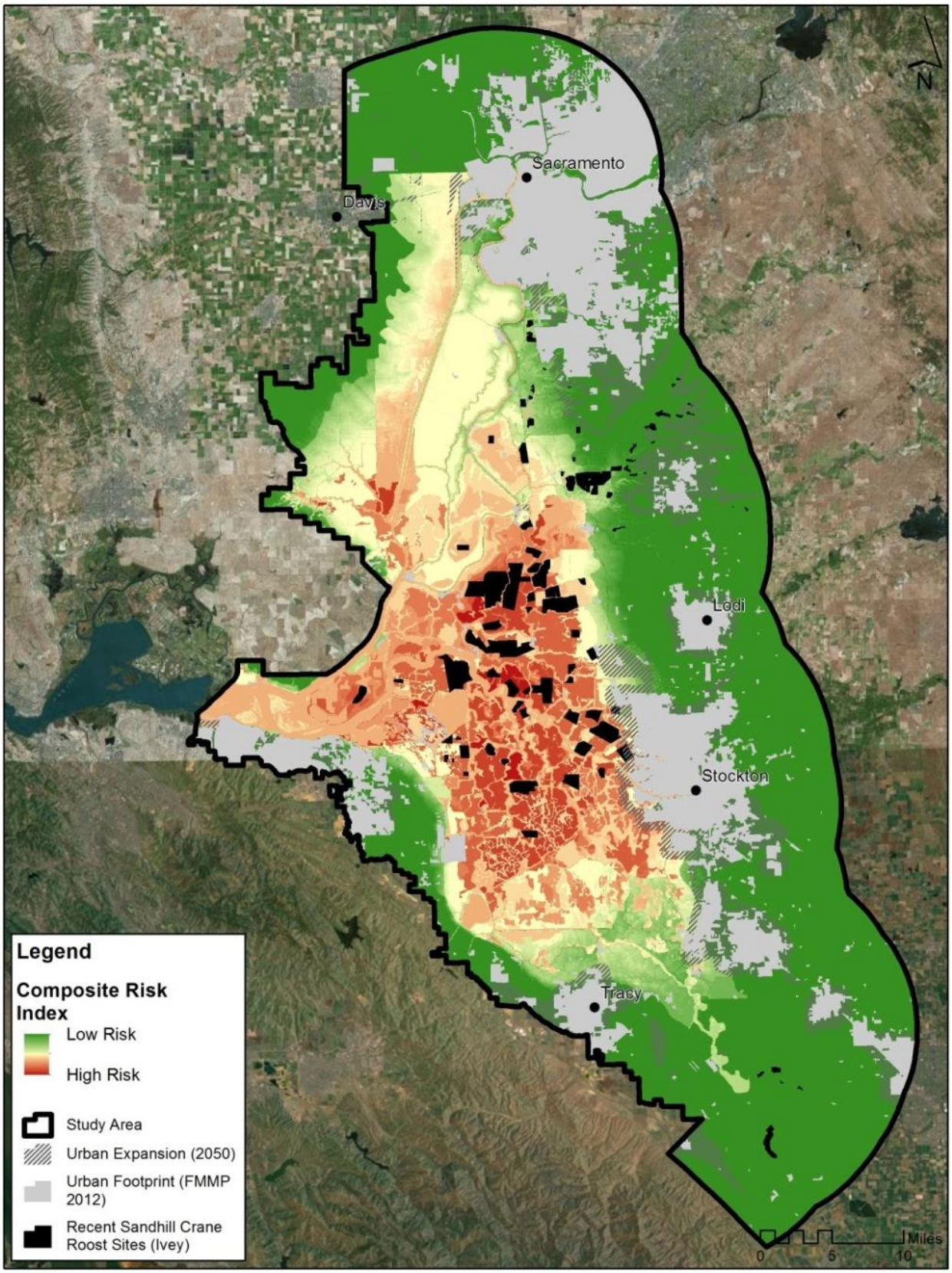


Van Vleck Ranch Mitigation Bank
Swainson's Hawk Service Area

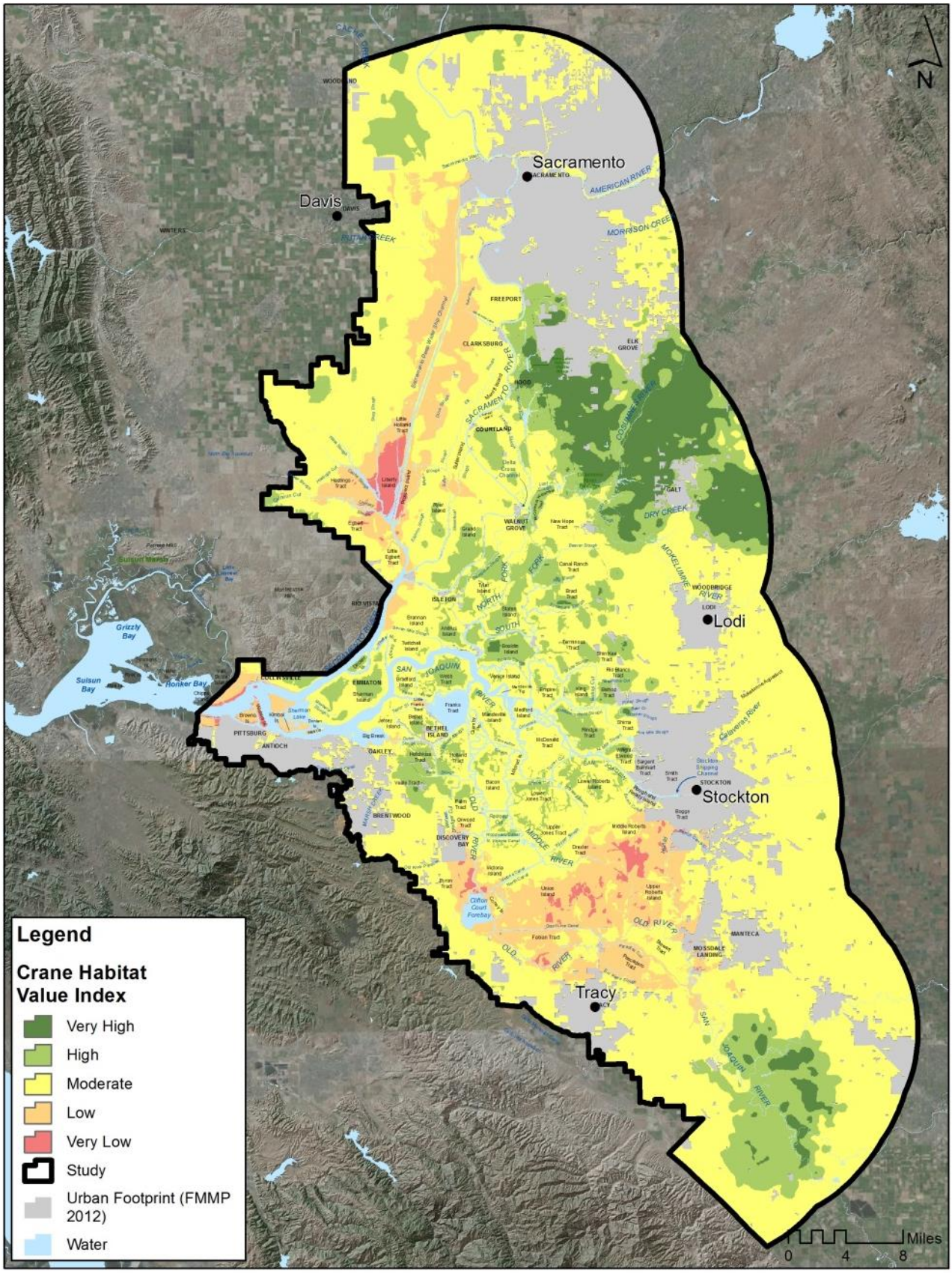
Current Crane Habitat Value (Not Accounting for current abundance patterns)



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



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



Letter 3 – Environmental Council of Sacramento (ECOS)

Response 3-1:

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

Response 3-2:

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

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

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

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

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

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

The commenter is of the opinion that growth in the City could make it impossible for the region to achieve its State VMT/GHG reductions and federal air quality mandates. The proposed Project's GHG emissions, which are partly based on VMT generated by the Project, were evaluated in Draft EIR section 5.7, Greenhouse Gas Emissions and Energy. Please see Response 5-3, which addresses issues concerning VMT and GHGs in more detail. As explained in Response 5-3, with implementation of several GHG reducing measures in the CAP that are based upon reductions in VMT, such as TACM-1, TACM-2, TACM-3, TACM-4, TACM-5, TACM-6, and TACM-7, daily VMT would be reduced in 2020 and 2030. GHG emissions associated with on-road vehicle travel would be decreased through implementation of the measures included in the CAP. Citywide, GHG emissions would be 876,070 MTCO2e by 2030, which is a reduction of 42,720 MTCO2e from the 2013 baseline of 918,790 MTCO2e, despite growth in population, employment, and housing in the City. The proposed Project's air emissions were evaluated in Draft EIR section 5.3, Air Quality. Other than speculation, the commenter did not provide any data or technical analysis contradicting the conclusions of the Draft EIR on this topic.

Response 3-3:

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

Response 3-4:

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

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

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

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

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

Response 3-5:

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

Response 3-6:

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

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

Response 3-7:

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

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

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

Response 3-8:

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

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

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

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

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

Response 3-9:

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

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

Response 3-10:

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

Response 3-11:

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

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

Response 3-12:

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

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

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

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

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

Letter 4

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

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

RE: Elk Grove General Plan Update and DEIR

Dear Mr. Jordan,

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

4-1

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

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

4-2

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

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

Letter 4 continued

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

4-2 cont.

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

4-3

Sincerely

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

Letter 4 – Friends of Stone Lakes

Response 4-1:

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

Response 4-2:

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

Response 4-3:

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

Letter 5

350 sacramento

September 26, 2018

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

Via electronic and hardcopy mail

Dear Mr. Jordan:

DEIR, GENERAL PLAN AND CAP UPDATE: 350 COMMENT

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

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

Minimal Compliance Strategy

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

5-1

Alternative 2 - Additional Climate Action Plan Measures

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

5-2

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

discounting Alternative 2 not compelling.[2] We urge the City to adopt Alternative 2, based on prudent, long-term self-interest in adopting the strongest feasible CAP. **5-2 cont.**

Increased GHG Emissions

On-road vehicles are the largest source of the City's GHG emissions, comprising 47 percent of total emissions (the next largest source, residential buildings, generates 25 percent) [3].

We are concerned that under the project as proposed: **5-3**

- GHG emissions will increase by 58 percent (2015-2050).[4]
- Vehicle miles traveled (VMT) will more than double.[5]
- Large areas of the City will generate substantially more miles of vehicle traffic than permissible under the requirements of SB 375.[6]

Potential Additional Measures

Under Alternative 2, the DEIR identifies a number of the additional measures not included in the CAP which would reduce VMT and GHG emissions: **5-4**

> "*the City … could include further efforts to adopt and promote transit-oriented development, pedestrian and bicycle measures, public transit, use of efficient and alternative vehicles, … zoning changes and changes in development patterns,*

---

[2] The DEIR presents three rebuttable arguments to discount Alternative 2:

- *"… the feasibility of achieving the target depends on implementation of the proposed CAP, achieving short-term targets, amending the CAP with additional measures, and monitoring emissions inventories over the next 30 years."*

  IN REBUTTAL, this self-evident assertion applies to any set of measures, so does not support discarding Alternative 2.

- *"Additional technologies and reduction measures could be developed in the coming decades that would increase the probability of reaching the 2050 emissions reduction targets; however, the efficacy of this alternative would be uncertain."*

  IN REBUTTAL, we agree the availability and efficacy of future new measures is unknowable. Therefore, to assume they will be available would be imprudent, particularly considering the urgency of reducing GHG emissions. The City should consequently apply measures now available and of known efficacy. Should/as improved methods become available, they can be reflected appropriately in the CAP through regularly scheduled updates or anytime.

- *"Based on this uncertainty, like the proposed Project, GHG emissions under this alternative would also be significant and may be unavoidable".*

  IN REBUTTAL, this conclusion, based on the previous faulty argument, ignores the reality that promptly applied, currently available measures would reduce GHG emissions. No evidence is presented that such measures would not reduce GHG emissions significantly. We also note that the term "significant" is used here in the narrow sense of meeting minimum CEQA thresholds, reflecting the DEIR's strategy of minimal compliance with external mandates. From the real-world perspective of climate-change physics, all GHG emissions are significant, and all reductions in emissions are important.

[3] DEIR section 5.7, GHG and Energy, Table 5.7-3, *Communitywide Greenhouse GHG Emissions by Sector In Elk Grove City Limits, 2005–201*

[4] DEIR, Appendix D, Greenhouse Gases, Table 15, *On-Road Vehicles Legislative-Adjusted Business-As-Usual Emissions Forecasts (2013-2050) (MTCO2e/year*

[5] DEIR, Table 5.13-9, *Existing and Projected Daily VMT*

[6] DEIR Section 5.13, Transportation; Figure 5.13-14, Residential and Work VMT by Traffic Analysis Zone

upgrading pedestrian and bicycle facilities, constructing upgraded and additional public transit facilities, installing additional public vehicle charging stations, and other measures." [7]

5-4 cont.

VMT Mitigation

As noted above, large areas of the City will not comply with the requirements of SB 375. Regarding this problem, the DEIR states,

"…new land use plans or development projects must demonstrate through the [City's Transportation Analysis Guidelines] that VMT produced by the proposed project does not exceed established VMT limits" [9].

5-5

The draft Transportation Guidelines present a protocol for evaluating potential VMT impacts from future development, and identify general VMT-reduction strategies under the categories of Land Use/Location, Site Enhancement, Transit System Improvement, Commute Trip Reduction, and In-Lieu Fees.[10] They are thus a critical element of the City's GHG reduction strategy, and we anticipate further review during the City's administrative process.

Thank you for your consideration of our comments. We expect to participate in the City's review process and to comment further on the CAP document, and look forward to dialoging with the City regarding this important initiative.

Sincerely,

Laurie Litman, President
350 Sacramento

cc: 350 Sac CAP Team members

7 DEIR Section 7.0, Alternatives; pg. 7.0-19.

9 DEIR Section 5.13, Transportation; pg. 5.13-56

10 DEIR Section 5.13, Transportation; Table 5.13-10, *VMT Reduction Strategies*, pg. 5.13-59

Letter 5 – 350 Sacramento

Response 5-1:

The commenter states the Draft EIR focuses on meeting state climate-change requirements in order to streamline future project-specific greenhouse gas (GHG) analysis and that this is a reasonable approach from an administrative standpoint. The commenter also urges the City to join other California jurisdictions in committing to the most aggressive climate change policy feasible. This comment is introductory in nature and does not address any specific analysis or conclusion in the Draft EIR regarding the GHG analysis. No further response is required.

Response 5-2:

The commenter urges Alternative 2 (Additional Climate Action Plan) to be adopted and suggests that the arguments that discount Alternative 2 are not compelling. Under Alternative 2, the City would adopt additional measures in the Climate Action Plan (CAP) that would further exceed established GHG reduction targets for 2020 and 2030 and allow the City to meet the State's targets for 2050. The Draft EIR concludes that GHG emissions are a less than significant impact for 2020 and 2030 but a significant and unavoidable impact for 2050 due to uncertainty regarding availability of measures to reach 2050 emissions reduction targets. Additional measures may include, but are not limited to, CALGreen Tier 1/NetZero by 2020, additional transportation sector measures, a direct offset program, and other emissions reduction options considered as part of the Project but not included in the proposed CAP.

The commenter has mischaracterized the approach to the assessment for Alternative 2. The Draft EIR did not "reject" Alternative 2 but provided an analysis of the comparative merits of this Alternative, as required under CEQA. An analysis of the impacts of Alternative 2 compared to those of the proposed Project was provided in the Draft EIR in Section 7.0, Project Alternatives, on pages 7.0-18 through 7.0-20 and addressed all topics, not just GHGs. The Draft EIR provided reasoned explanations how Alternative 2 would or would not avoid or reduce environmental impacts compared to the proposed Project. Alternative 2 is a "build" alternative. As stated on page 7.0-27, Alternative 2 would have the same footprint and similar impacts to those of the proposed Project. It would, however, have reduced air and GHG emissions over the coming decades and would increase the probability of achieving 2050 GHG emissions reduction targets. Alternative 2, like Alternatives 4 and 5, was not identified as an environmentally superior alternative because, as stated on page 7.0-28, it is not substantially different from the proposed Project or each other. Because of the fundamental nature of the General Plan, each of the alternatives involves continued development and population increases, and none of the alternatives would avoid potentially significant impacts or avoid impacts characterized as unavoidable.

The City acknowledges the commenter's support for Alternative 2 and disagreement with the explanation provided in the Draft EIR regarding the efficacy of Alternative 2 in achieving GHG reductions. The comment suggests that the City should apply greenhouse gas (GHG) reduction measures that are available now and have known efficacies. While the longer-term 2050 goal is not met through combined legislative and local actions, the Climate Action Plan (CAP) demonstrates substantial progress towards achieving this goal. However, this goal is not codified in law and the longest-term legislatively-mandated GHG reduction target is adopted for 2030. As stated on page 5.7-37 of the Draft EIR, "the State has not yet proposed a detailed update to the Scoping Plan for future targets that may be adopted beyond 2030 on the path to meeting the 2050 goal." Further, the Draft EIR in both Section 5.7, "Greenhouse Gas Emissions and Energy" and page 7.0-20 conclude that because GHG reductions cannot be substantiated to meet the

2050 goal, the impact is significant and unavoidable. However, as demonstrated in Table 5.7-6 of Section 5.7, currently-available and feasible GHG reduction measures are anticipated to reduce the city's GHG emissions to meet both the 2020 and 2030 reduction targets. The Draft EIR's conclusion to the impact of the Project on climate change does not negate the City's commitment to implement the CAP, but rather, acknowledges that the CAP cannot solve all the City's GHG emissions challenges for the next 30-plus years.

The decision whether to reject Alternative 2 as a feasible alternative is at the discretion of the City Council, which will use the analysis presented in the Draft EIR to inform that decision.

Response 5-3:

The commenter expresses concern that the Project will result in an increase in GHG emissions, a doubling of vehicle miles traveled (VMT), and Senate Bill (SB) 375 requirements will not be met.

The commenter's statement regarding the increase in GHG emissions cites Table 15 of Appendix D of the Draft EIR. This table demonstrates the GHG emissions forecasts with legislative reductions but without the measures that are included in the CAP. Under the Project, GHG emissions associated with on-road vehicle travel would be decreased through implementation of the measures included in the CAP. As shown in Table 5.7-6 in the Draft EIR, there are several GHG reduction measures that aim to reduce on-road vehicle travel emissions. These measures would reduce GHG emissions by 28,979 metric tons of carbon dioxide equivalent (MTCO2e) by 2020 and 45,328 MTCO2e by 2030. Citywide, GHG emissions would be 876,070 MTCO2e by 2030, which is a reduction of 42,720 MTCO2e from the 2013 baseline of 918,790 MTCO2e, despite growth in population, employment, and housing in the City.

The commenter claims that VMT would be doubled under implementation of the Project, citing Table 5.13-9 of the Draft EIR. The VMT associated with full buildout of the General Plan Update would result in annual VMT of approximately 6,875,000. However, this projection does not include implementation of the VMT-reducing measures of the CAP. There are several GHG reducing measures in the CAP that are based upon reductions in VMT, such as TACM-1, TACM-2, TACM-3, TACM-4, TACM-5, TACM-6, and TACM-7. These measures are collectively anticipated to reduce daily VMT by 273,435 by 2020 and 390,488 by 2030. These reductions in VMT can be found in Appendix D of the Draft EIR.

The commenter suggests that large areas of the City will generate substantially more VMT than permissible under the requirements of SB 375, and refers to Figure 5.13-14 of Section 5,13, Transportation, in the Draft EIR. SB 375, as described on page 5.7-12 of Section 5.7, "Greenhouse Gas Emissions and Energy" requires the California Air Resources Board and Metropolitan Planning Agencies to set regional VMT reduction targets for 2020 and 2035 to reduce GHG emissions.

Figure 5.13-14 shows that specific areas of the City that exceed the 15 percent reduction in VMT pursuant to Policy MOB-1-1 of the General Plan Update. Those areas which exceed this threshold would be required to conduct a VMT analysis as described in the Transportation Analysis Guidelines. As stated on page 5.13-55 of the Draft EIR, "Areas shown in green exceed the 15 percent per service volume threshold and would require project modification or other reduction strategies to satisfy the threshold." All new land use and transportation projects are required to comply with the VMT reductions required by MOB-1-1, which is consistent with guidance issued by OPR pursuant to the requirements of SB 743 and would result in a 15 percent reduction of project VMT over baseline conditions. The Draft CAP Update also includes Transportation Alternatives and Congestion Management (TACM) Measure 6, Limit Vehicle Miles Traveled, which is consistent with General Plan Policy MOB 1-1. While the Draft EIR identifies areas in the

City where the 15 percent reduction in VMT would be exceeded without mitigation, projects in those areas would be subject to project modification or other reduction strategies to satisfy the threshold. Therefore, those areas would not exceed the VMT requirements of SB 375. The issues raised by the commenter and the City's responses to those issues, which clarify and elaborate on information presented in the Draft EIR, do not affect the conclusions of the analysis in the Draft EIR.

Response 5-4:

The commenter suggests, under the subheading "Potential Additional Measures," that additional GHG emission reduction measures not included in the CAP but identified under Alternative 2, would reduce VMT and GHG emissions. The additional reduction measures included on page 7.0-19 in Section 7.0, Alternatives include additional building requirements and additional transportation sector measures that would get the City closer to its longer-term 2050 goal. The City is adding additional GHG reduction measures to the CAP, which include minimum standards for electric vehicle charging stations at new multifamily and nonresidential projects, as well as building electrification and solar PV programs. The addition of these measures would result in additional GHG reductions; however, based on the uncertainty of achieving the 2050 emissions reduction targets, like proposed Project, GHG emissions under Alternative 2 would be significant and may be unavoidable.

Response 5-5:

The commenter reiterates a previous statement that the City will not be able to comply with the requirements of SB 375. Refer to Response 5-3. The commenter also notes that the draft Transportation Analysis Guidelines will provide VMT-reduction strategies that are thus part of the City's GHG reduction strategy and suggests that they will be used during the City's administrative process. The commenter appears to be referring to project-level reviews for consistency with the Transportation Analysis Guidelines that would occur during the administration of the development review process, which the City agrees would contribute to the VMT reductions and associated GHG reductions that would result from such project-level analysis and compliance, and which are assumed under the Draft EIR's analysis of MOB 1-1 and CAP GHG Reduction Measure TACM-6. This comment is of a general nature and does not address any specific analysis in the Draft EIR or its conclusions. No changes to the Draft EIR analysis or conclusions are required as a result of this comment.

Letter 6

From: Suzanne Pecci
To: Christopher Jordan
Subject: Fwd: Comment on DEIR for General Plan Update
Date: Wednesday, September 26, 2018 5:06:51 PM

Begin forwarded message:

From: Suzanne Pecci <slpecci@aol.com>
Subject: Comment on DEIR for General Plan Update
Date: September 26, 2018 at 4:28:54 PM PDT
To: cjordon@elkgrovecity.org

Following are my comments:

5.9 Hydrology and Water Quality, **Groundwater Supply and Use**, Groundwater Management
Comment: Amend this part for accuracy to read as follows: *Including First Amendment of 1-11-17 where the City shall appoint a City Representative and an elected member of the governing board of Florin Resource Conservation District or designated employee of FRCD/EGWD to serve on the board which the City did by Resolution passed and adopted on July 11, 2018.* The City is a current member of SCGA.

6-1

5.9-38 Existing Laws and Proposed General Plan Policies that Provide Mitigation Policy INF -1-1 Comment: delete *'or shall be assured through the use of bonds or other sureties to the City's satisfaction. "* This is not in compliance; with Senate Bill 610 requiring the identification of an available water supplies for existing urbanization and foreseeable growth for 20 years into the future and requires collaboration between cities and counties and water suppliers;California Water Code 10910 thru 10915 which requires coordination between land use and public water purveyors; SB 221requiring approval by a city or county of written verification of sufficient water supply to ensure collaboration; Water Forum Agreement 2000 updated 10-2015 Amendment IV, Relationship of WFA to Land use Decision Making (2-2002) Noting that FRCD/EGWD/EGWS is a Successor in Interest and OHWD is a Signatory of the WFA, both being named as water purveyors in the City and the Planning Area respectively.

6-2

5.9-41 **5.9.7 Cumulative Groundwater use** -Amend these discussions so that they comply with all laws of the State of CA, including SGMA -the idea that the proposed Project (meaning the General Plan of the City) could increase demand for water resource and result in withdrawal that exceeds the sustainable yield of the Basin of 273,000 which is potentially cumulative and considerable.

6-3

MM 5.12.1.1 discussion of how insufficient water supplies availability to meet the demand of new development in the Planning Area in addition to existing and planned development ...and how it would be managed to ensure compliance with the WFA" is not within the purview of the city to

6-4

Letter 6 continued

implement'—posing cumulatively, considerable , and unavoidable impact would be **significant and unavoidable.**

Comment: The City of Elk Grove cannot simply walk away from its responsibilities to work with the county and other cities in the Region to comply with the Sustainable Groundwater Management. This "Blackmail" approach that the city is taking jeopardizes the Region and invites take over by the Department of Water Resources. It is a bullying tactic, in my opinion, that could back fire with potential consequences to all the water users in the City and the Planning Area. A reminder that the City is a member of the SCGA as discussed previously and a Successor Interest to the Water Forum. I do not feel that by abdicating this role as a responsible agency in the region and simply saying" not within the purview of the City to implement", takes the City out of the loop and somehow allows the city to be an innocent bystander in creating a problem for the region that the City takes no responsibility for by refusing to coordinate and collaborate according to the many laws of the State. The city is not just an observer, in assuring sustainable water planning for residents of the City.

6-4 cont.

Importantly, the Water Forum Agreement provides that LAFCo may impose conditions on SOI approval that future annexations will have to be consistent with WFA and potentially provide additional data on how the Area will be served by water.

Please confirm receipt of my comments upon receipt, as I had a problem getting earlier General Plan comments to you by e-mail a few weeks ago and provider you with a hard copy at the meeting. Comments sent Wed. 9/26/18 at 4:27 PM

Thank you

Suzanne Pecci
slpecci@aol.com

Suzanne Pecci
slpecci@aol.com

Letter 6 – Suzanne Pecci

Response 6-1:

The commenter requests that information be added to the "Groundwater Management" subsection of the "Groundwater Supply and Use" subsection in Section 5.9, Hydrology and Water Quality, in the Draft EIR. These subsections, on page 5.9-18 in the Draft EIR, summarize information about how groundwater supply is managed by the Sacramento Central Groundwater Authority (SCGA) and requirements of the 2014 Sustainable Groundwater Management Act. In response to this comment, the following revision has been added following the second sentence of the first paragraph on page 5.9-18 of the Draft EIR:

> The City does not directly manage groundwater supplies. The Sacramento Central Groundwater Authority (SCGA) manages groundwater in the Central Basin portion of the South American Subbasin. The SCGA was formed in 2006 through a joint powers agreement signed by the cities of Elk Grove, Folsom, Rancho Cordova, and Sacramento, and Sacramento County. The City is a member of the SCGA with a board seat, and also appoints an elected member of the governing board of the Florin Resource Conservation District (FRCD) or designated employee of the FRCD/Elk Grove Water District to serve on the Board, which the City did in July 2018.

Response 6-2:

The commenter raises a concern with General Plan Update Policy INF-1-1. The Draft EIR does not quote the correct text that can be found in the draft General Plan. The text in Policy INF-1-1 on page 5.9-31 has been amended as follows:

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

Response 6-3:

The commenter states the Impact 5.9.7 in the Draft EIR should be amended to comply with the laws of the State. The Draft EIR conservatively assumes that because demand from the Study Areas was not included in SCWA's projections, additional groundwater production may result in withdrawals that exceed the 273,000 acre-feet annual sustainable yield. However, as discussed on Draft EIR page 5.9-45, provision of groundwater would be at the discretion of the SCWA. As a signatory to the Water Forum Agreement, SCWA would not be able to exceed the annual sustainable yield amount without amendments to the Water Forum Agreement.

Response 6-4:

The commenter is of the opinion the City is not taking responsibility for coordinating and collaborating with Sacramento County and other cities in the region concerning groundwater management. The commenter also states the Water Forum Agreement provides that LAFCo may impose conditions on SOI approvals regarding water supply. While this is a general comment and is not directed to the analysis or conclusions in the Draft EIR concerning water supply, it should be noted that policy LU-3-36 has been amended to require that, at the time of annexation, the Groundwater Sustainability Plan, as applicable, and the applicable water purveyor's water master plan(s) identify available water supply for the annexation project . No further response is required.

7 - DEIR Meeting Transcript

General Plan Update
EIR – Public Comment Meeting Transcript

Susan Pecci:

For the record my name is Susan Pecci and I live in the rural area on the urban services boundary. So some of the issues and comments that I have made are with respect with living on that edge of the between of the City of Elk Grove and Sacramento county. I forwarded my comment to the planning commission thinking that it was a full meeting and, so Christopher gave you all a copy of mine… So the first thing that I wanted to talk about a comment on DEIR 5.2 agriculture resources 5.2-to regulatory framework. Titled: Local City of Elk Grove Municipal Code. And the discussion talks about the adoption, the incorporation of the city and - I want - the right to farm and the adoption of the county ordinance right to farm as a city regulation.

My first comment is that when I looked in the reference section following that, um, section on agriculture resources I didn't see a copy of either the county ordinance, the right to farm, or the city regulation right to farm. And I think it would be good to have in the references so people could actually read what the right to farm says.

Another, I forwarded a copy of the brochure that I received on UC Davis which talks about what the right to farm really is. And the right to farm is not just giving farmers the right to farm to preserve agriculture, it's also to establish good neighbors between the urban and the rural connection point. It is about establishing statute of limitations if in fact farming activities become a nuisance. It is about the right of people to file complaints with the agriculture commissioner, and so all of these things kind of go into that, I's not just about everybody's ability to grow on their property.

I know that in the rural area people are thinking right farming you can have fruit trees on your land five acres or two acres, and in my estimation and my opinion that's not what it is. So I forwarded that copy uh, to the, all of the, uh, planning commissioners, and I'll give you a copy of that to kind of think about, to see if maybe some of that wording can be incorporated a little bit more into the body of the uh EIR document.

The next section is impact 5.2-2 complex resulting in conversion of farmland in non-agricultural use. I live in the urban services boundary which is that connection between urban and rural, and I live on five acres. I lived there for thirty years, and it has been the land behind me, the land behind me has been a dairy, it's been perennial crops, it's been nothing, it's been hay, it's been a lot of things, and recently it went into grapes, and it seems bucolic, and it seems like it's something that would be great to look at, and they are. But there are um, I've learned a lot about grapes, and I learned about living on that rural edge, and I really learned what agriculture means to those of us that live along there, there're seven of us lot owners that live back right up to the vineyard and so I have worked

PC-1

7 - DEIR Meeting Transcript continued

with the agriculture commissioner, and I worked through DPR and the farmer. And we have resolved the issues to respect to the type of pesticides that are used, spray patterns and where they do their work, and were they park their porta-potties, so we've been able to work it out. But that's kind of what the urban/rural edge is even when you live on 5 acres. You still are not used to this type of activity. So that's something that I'd like you really look at too. You've had that impact as less than significant, that's more that, it is significant. And especially if you look at, the fact that the land that's in the flood plain is still intended to be farmed.

PC-1 cont.

There is a lot of farming and a lot of farming activities out there, which is great. You look at the general plan of the county, Sacramento, and they really have done - they have really tried to introduce that as being a new, a wine country in this area. So, a lot of the activities in the general plan for the city of Sacramento, a lot of the things that farmers can do out there, which is fine, is by right. But that is going to impact all of us that don't' have the rights that farmers do, and there can be manufacturing, food processing, wine events, a lot of things that are done by right, and the, let me get back to buffers. The better the buffers, the better the distance, and in my opinion the better the neighbors. So I'll pass it on to somebody else and I have another comment later, ok.

The next comment I have is on ground water supply and demand. Protections 5.9-19, and I'm just going to read what my comment is, the sentence is not correct in my opinion, and it should read: within the planning area boundaries its shown in figure 5.9-4 SCWA is the service provider. You had said that there is three service providers within that planning area, and I double checked the map and those planning areas are all outside the city limits. The other two service providers that you named Elk Grove Water District is not a service provider in that area. They would have to submit an application to LAFCO to expand their boundaries and to date, to my knowledge, they have not done that and that's very public process of outreach that hasn't been performed in the City. The other one you mentioned is Omochumne-Hartnell Water District and while they have those latent powers to purvey water they need to contract with a service provider. Again to my knowledge, to initiate those latent powers is a LAFCO process, and I'm talking with LAFCO, that has not been done today, again that's a public outreach and those of us that live in Omochumne-Hartnell district out there and there are a lot of Ag Res on five acres. That will be an outreach process not only for us who live within the district, but also to the rest of the city, that is part of the general plan if in fact this area is annexed within the city at some point and time.

PC-2

The other sentence, there is a second sentence to that paragraph, it says only the SCWA and EGWD which you had named previously as water providers in that area, again which they are not in that time, extract ground water as part of their supply. I really didn't understand what that means by supplies, so what are supplies? Omochumne-Hartnell now is an Ag water district, they pump water, they have riparian rights along the river and at times when they can divert surface water, and when its available they do. So, what does

that mean, what are the supplies of OHWD? Are they ground water pumping, are we talking surface water, are we talking some kind of a contract to transfer or sell water? Really I think it needs to be clarified, what are the supplies of these two that are not the purveyors in that area.

The next section is 5.9-36 and 37. Impact 5.9.4 states: The City would not direct how water supplies would be managed, it is conservatively as you said, assumes that the study area demand will be served entirely by ground water. The additional demand when added to historic highs 34,600 acre feet annually could exceed SCWA's projection of available water volume in 2020 and 2025 but may be accommodated beyond that. However, the estimate doesn't account for cumulative future demand on groundwater supplies. So, the question is what's the alternative plan. If it's SCWA area, if OH and EG and Elk Grove Water District are not water service providers, or is there some kind of plan that could be developed and pick up the slack, if in fact SCWA cannot provide the water for that area? That's the question, and can you just clarify it because it just leads the reader wanting to know, what, what is the plan?

The next one is 5.9-38 conclusion: The last two sentences say quote: as of the time of the preparation of this draft EIR DWR has not approved a sustainable ground water management plan for the South American Basin. As such the proposed project would not conflict with the plan. So, there is no conflict with the plan because the area is really not included with the plan. But it does not preclude the fact that just because it's not the plan it won't have an impact. What is the impact on ground water, it's not in the plan. And if the plan is approved and outside, how will that be dealt with, what does that mean to all of us using ground water?

PC-2 cont.

So, I think that's pretty much it and I just had one more comment regarding the Wilton Rancheria. I note that there isn't any section at all in that planning, in this EIR. At least I haven't found it - I'm working my way through it -that gives any information on water supply for the casino. And I know that this is a big a part of the vision of Elk Grove, and the FEIS and DEIS for this project were for water to be provided by SCWA and the infrastructure was for the mall and not for a casino. Will there be a section at all for the water for the casino? It is planned and lots of approvals have been made. And also some discussion to their sovereign water rights and they have water rights in the Cosumnes. And also there has been a lot of recent case law on how this ground water rights of tribes can impact ground water, and I think that, maybe, there should be a little bit of discussion on that because it's certainly seems to be a big part of the plan for Elk Grove, thank you.

Lynn Wheat

Hi my name is Lynn Wheat citizen planner, and I will begin with the introduction where I have submitted comments on the NOP and it said the location where I could find my comments addressed. And I appreciate that they identify the sections, but I would like page

PC-3

numbers included in that. Ok so the sections and the final EIR can be numbered as well as identified, that would help.

PC-3 cont.

So my first comment is that they did in the air quality study, they did some measurements at some stations, and one was located at Bruceville south of Lambert, which is not highly developed at this time. And the other area was City of Sacramento in T Street. I would like for the air quality study to look at areas within our city such as maybe around Civic Center Drive where we're going to have traffic impacts with our new Costco. Also, within the document on traffic study, it identified studies that were used, I would like to see the City's citizen survey that is done, that's the study. And it identifies exactly how many of our residents use cars as our primary modes of transportation.

PC-4

Now I appreciate that within the DEIR that suburban propane is mentioned within our hazardous section of this document, however I do not believe that my comments on the NOP where actually included in the DEIR or evaluated such as take proactive approach to risk assessment to the propane, and in particular referred to the 2017 county, Sacramento County Local Housing medication Plan, and Appendix B. I believe is where Elk Grove is listed and it is cited. However, the studies that have been used and have been referenced in the DEIR were from the early 2000s. And since that time studies on propane tanks and facilities of that such have been completed that there was a study done and I would actually like more studies referenced in our final EIR.

PC-5

I would to have like something done as was done in Roseville where they, in our changing world, have identified terrorism as a threat and have it in their plan. It's not required by the federal Government or the state, but I would like our city and that's what I mean proactive to identify that. The reason being is that our City received a grant through homeland security, and we have used those monies and grants to come up with some evacuation plans, and to identify risks within our area, Sacramento Elk Grove area, and so I will say that within that there where, in the United States there were sixty-four cities of highest risk in urban areas, and there were ten in tier one that were identified, and there were fifty-four in tier two, of which Elk Grove was one of those. So, to not identify not identify that and ignore that when we are urbanizing and bringing in denser population within that area is a concern to me. Even within our Elk Grove safety element, amendments through 2016, it refuses to identify that as a special risk. So that again I would like some elaboration within the final EIR on my NOP comments.

PC-6

I needed to look at this a little bit closer but I realize we are doing a two hundred year flood mapping. I have a comment here that it should be completed within two to three months and I don't know if that's been done within the time that this particular document has been under way, but if indeed it has, I would like to see that within our final EIR and just a comment that I know that's not going to change in our facts of finding and overriding considerations. I am very disappointed that we're still going to have traffic as that, and the mitigations we're using if you look at our citizen survey and just asses our community are

PC-7

PC-8

not practical. So I think we need to look at it in a different way. Our public transportation system runs at a deficit, it's not well linked within our community and not used. So, I do not believe that that is a realistic mitigation, and I would like other mitigations to be considered.

PC-8 cont.

Getting back to air quality, trees are being used as a mitigation. Well when we are narrowing our walkways along streets, trees are not really successful. And we have lost some of our bigger trees within our City. And then trees planted in some other areas had to be removed because of the sidewalks, so uprooting the sidewalks.

PC-9

So again I'll be submitting written comments. I need to get through this but this is just off the top of my head. I'm going through my NOP comments. Thank you.

PC-10

PC – DEIR Public Comment Workshop Comments Transcript

Response PC-1:

The comment is related to living in the rural area of the City and effects of farming activities in these rural areas. The commenter states the City's regulation regarding the right to farm should be included in the EIR. As stated in Response 2-1, CEQA Guidelines Section 15148 (Citation) establishes that "preparation of EIRs is dependent upon information from many sources…. These documents should be cited but not included in the EIR." The Draft EIR has complied with this requirement. For reference, Title 14 of the City's Municipal Code can be found at https://www.codepublishing.com/CA/ElkGrove/#!/ElkGrove14/ElkGrove14.html.

The commenter continues that the right to farm, based on information from UC Davis, that the right to farm is not about preservation of agriculture, but it is also to establish good neighbors. To the contrary, as stated on Draft EIR page 5.2-18, City of Elk Grove Municipal Code Chapter 14.05, Agricultural Activities, is intended to ensure that agricultural operations that are operated in a manner consistent with proper and accepted customs and standards are allowed to continue and requires that notification be provided to residents of property located near properties designated for agricultural use, that these agricultural uses are encouraged, that accepted agricultural practices may continue, and that efforts to prohibit, ban, restrict, or otherwise eliminate established agricultural uses will not be favorably received. It also includes notification and mediation procedures for cases in which agricultural activities are not being conducted in a reasonable manner, or when the operator of an agricultural operation is not using currently acceptable methods in the conduct of the farm. Thus, while the Code does provide a remedy for impacts due to improper agricultural operations, it is not intended to protect adjacent uses from proper and reasonable agricultural operations. It should also be noted that the commenter is referring to an existing condition. The Project is not responsible for improving existing conditions.

Response PC-2:

The commenter refers to groundwater supply and demand, which are based upon written comments submitted by the commenter. Refer to Responses 6-1 through 6-4.

Response PC-3:

The commenter requests that the page numbers in the Draft EIR where her NOP comments were addressed be included in the EIR. CEQA Guidelines Section 15084(c) establishes the Lead Agency must consider all information and comments received. Table 1.0-1 in Section 1.0, Introduction, summarized NOP comments received and where the topic was addressed in the Draft EIR. The table format is intended to allow a commenter to find where in the EIR a topic was addressed; there are no requirements under CEQA that page numbers be included. For the Final EIR, a list of all persons submitting written comments on the Draft EIR is included in Section 3.0, and each letter is assigned a letter or a number. Responses are provided in this section (Section 4.0). The commenter's letter is Letter 2, which can be readily found in this section.

Response PC-4:

The commenter requests the air quality analysis to address specific areas in the City, such as Civic Center Drive near Costco. As discussed in Response 2-6, the data provided in Table 5.3-4, obtained from SMAQMD's Air Quality Monitoring Stations, is sufficient to inform the analysis contained in Chapter 5.3 of the Draft EIR. The commenter also requests that the traffic study

include the citizen survey. The comment does not state how the survey relates to environmental impacts disclosed in the EIR or the conclusions of the impact analysis. No changes to the Draft EIR are required.

Response PC-5:

The comment is related to potential hazards at the Suburban Propane facility. Refer to Responses 2-17a through f.

Response PC-6:

The commenter recommends that the City should identify terrorism as a threat and include it in presumably what the commenter is referring to as the City's Local Hazard Mitigation Plan, similar to what Roseville has done. This is a planning consideration that does not require analysis in the Draft EIR. See Responses 2-17a, 2-17d, and 2-17e.

Response PC-7:

The commenter requests that information be added to the Final EIR concerning 200-year floodplain mapping, indicating that mapping should be done "within two to three months." The map has since been updated and is shown in Chapter 2.0, Errata. The Draft EIR (page 5.9-6) described the then-current status of floodplain mapping and states that the City recognizes that flood risk conditions can change over time through natural processes or project improvements on the local or regional scale. The 200-year flood map is considered the base case for establishing potential flood risk. The City will keep updated data on the 200-year floodplain through an annual review, accounting for the results of new technical studies and changes in flood protection infrastructure. This updated information will be referenced during the development review process for areas on the base case 200-year flood map, as shown in the updated Figure 5.9-3 in Chapter 2.0, Errata, of this Final EIR. The Draft EIR concluded flood hazard impacts would be less than significant with implementation of General Plan policies and Municipal Code requirements (Draft EIR page 5.9-36) and no mitigation measures are required. As a point of clarification, because there would not be a significant impact requiring mitigation, the City would not have to make Findings or adopt a Statement of Overriding Considerations for this impact.

Response PC-8:

The commenter expresses disappointment that there will be traffic, and that public transit runs at a deficit and is not used or well linked with the community. The commenter requests other mitigation to be considered. See Response 2-14, which addresses traffic and transit. The commenter's disagreement with the effectiveness of mitigation is noted. However, the commenter did not suggest alternate or additional mitigation that should have been considered. See Response 2-16, which addresses the citizen survey.

Response PC-9:

The commenter states trees are being used as mitigation for air quality but expresses concern that trees are removed because the roots damage sidewalks. This is not a comment on the adequacy of the Draft EIR or its conclusions. No further response is required.

Response PC-10:

The commenter states she will be submitting written comments. Responses to written comments submitted by the commenter are provided in Responses 2-1 through 2-21.