

# EXECUTIVE SUMMARY

## ES.1 INTRODUCTION

This summary is provided in accordance with California Environmental Quality Act Guidelines (State CEQA Guidelines) Section 15123. As stated in Section 15123(a), “an EIR [environmental impact report] shall contain a brief summary of the proposed action and its consequences. The language of the summary should be as clear and simple as reasonably practical.” As required by the guidelines, this chapter includes (1) a summary description of the City of Elk Grove Housing Element and Safety Element Update (Project), (2) a synopsis of environmental impacts and recommended mitigation measures (Table ES-1, presented at the end of this chapter), (3) identification of the alternatives evaluated and of the environmentally superior alternative, and (4) a discussion of the areas of controversy associated with the Project.

## ES.2 SUMMARY DESCRIPTION OF THE PROJECT

The proposed City of Elk Grove 2021-2029 Housing Element Update and Safety Element Update (Housing Element and Safety Element Update or Project) would amend the City of Elk Grove General Plan (General Plan) to update the Housing Element, amend the General Plan land use designations and zoning designations for up to 43 sites in the City, and amend the General Plan to update the Safety Element.

### ES.2.1 Project Background and History

State law requires each city and county to adopt a general plan containing at least eight elements including a housing element. The housing element, required to be updated regularly, is subject to detailed statutory requirements and mandatory review by the State Department of Housing and Community Development (HCD). This Housing Element Update is an update of the City’s previous housing element, which was adopted by the Elk Grove City Council on February 12, 2014 and certified by HCD on March 21, 2014.

Housing element law requires local governments to plan adequately to accommodate their existing and projected housing needs, including their share of the regional housing need. Housing element law is the State’s primary market-based strategy to increase housing supply, choice, and affordability. The law recognizes that in order for the private for-profit and non-profit sectors to adequately address housing needs and demand, local governments must adopt land use plans and regulatory requirements that provide opportunities for, and do not unduly constrain, housing development.

The timing for jurisdictions to update their housing elements is based on the update schedule of the regional transportation plans (RTPs) by the federally designated metropolitan planning organizations (MPOs). The City of Elk Grove is a member of the Sacramento Area Council of Governments (SACOG), which is the designated MPO for the region. SACOG is required to update its Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) every four years, which puts all member jurisdictions on a schedule to update their housing elements every eight years. The SACOG board adopted the 2020 MTP/SCS and accompanying documents at a special board meeting on November 18, 2019. For SACOG’s member jurisdictions, the 6th Cycle Housing Element planning period extends from May 15, 2021 through May 15, 2029.

Approved in 2019, Assembly Bill (AB) 747 (Levine) requires jurisdictions to review and update as necessary their safety element to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. This information must be included by January 1, 2022, or upon approval of the next update to the Local Hazard Mitigation Plan. Also approved in 2019, Senate Bill (SB) 99 (Nielsen) requires jurisdictions, upon the next revision of the housing element on or after January 1, 2020, to review and update the safety element to include information identifying residential developments in hazard areas that do not have at least 2 emergency evacuation routes. The proposed Safety Element Update addresses the requirements of these bills.

## ES.2.2 Project Objectives

The purpose of the Housing Element Update is to address the housing needs of the City and to meet the requirements of State law. The Housing Element Update includes the following goals:

**GOAL H-1:** Adequate sites to accommodate the City's housing needs.

**GOAL H-2:** Adequate housing stock to meet the needs of extremely low-, very low-, low-, and moderate-income households and special-needs groups.

**GOAL H-3:** Development regulations that remove constraints to the maintenance, improvement, and development of housing.

**GOAL H-4:** Maintenance and improvement of affordable housing conditions

**GOAL H-5:** Housing opportunities for all persons, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

**GOAL H-6:** Preservation of assisted (subsidized) housing developments for lower-income households.

The purpose of the Safety Element Update is to meet the requirements of AB 747 (Levine) and SB 99 (Nielsen). AB 747 requires jurisdictions to review and update as necessary their safety element to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. SB 99 requires jurisdictions to review and update the safety element to include information identifying residential developments in hazard areas that do not have at least 2 emergency evacuation routes. The Safety Element Update includes revisions to Goal SAF-1: A Safe Community.

## ES.2.3 Project Location

The City is located in Sacramento County and consists of approximately 42 square miles within its boundary (see Figure 2-1). Land uses are regulated under the City General Plan, which was comprehensively updated in 2019. The City General Plan established a Planning Area (approximately 31,238 acres) which includes all land within the current City limits as well as lands outside the City limits. Existing land uses in the City consist of residential at varying densities, commercial, office, industrial, park, and open space. Beyond the City limits, the Planning Area primarily consists of agricultural lands and rural residential uses. Nearby natural open space and habitat areas include the Stone Lakes National Wildlife Refuge and the Sacramento River to the west, the Cosumnes River Preserve to the south, and the Sacramento Regional County Sanitation District (Regional San) bufferlands to the northwest. Major roadway access to the City is provided by Interstate 5 (I-5) and State Route 99 (SR 99).

## ES.2.4 Project Characteristics

As identified above, the General Plan was comprehensively updated in 2019. The 2019 update incorporated the 2013–2021 Housing Element into General Plan Chapter 4, "Urban and Rural Development," and its provisions of sufficient land, with appropriate use designations, for the construction of the housing units that the City must accommodate according to the Regional Housing Needs Allocation (RHNA) by 2021 (7,401 housing units). The purpose of the 2021–2029 Housing Element Update is to establish parameters for future residential development and provide opportunities for purposeful expansion that are aligned with community desires, as well as regional growth objectives and State law. The proposed Housing Element Update is compliant with Government Code Section 65583, which identifies the requirements for General Plan Housing Element sections. In summary, Government Code Section 65583 requires that the Housing Element identify and analyze existing and projected housing needs, as well as establish goals, policies, and actions to address these housing needs, including adequate provisioning of affordable and special-needs (e.g., agricultural workers, homeless people, seniors, single-parent households, large families, and persons with disabilities) housing.

The General Plan also included Chapter 8, "Services, Health, and Safety," which includes goals and policies related to the following topics: Disaster and Emergency Risk Reduction (ER); Disaster and Emergency Response and Public Safety (SAF); Urban Infrastructure (INF); Community Infrastructure and Facilities (CIF); Infrastructure Financing and Phasing (IFP); Community Health (HTH); Community Services (CS); and Noise (N). The Project includes revisions to the Safety Element of the General Plan. These changes are required by AB 747 and SB 99 and incorporate emergency access route information.

### ES.3 ENVIRONMENTAL IMPACTS AND RECOMMENDED MITIGATION MEASURES

This EIR has been prepared pursuant to CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Section 15000 et seq.) to evaluate the physical environmental effects of the proposed Project. The City is the lead agency for the Project. The City Council has the principal responsibility for approving the Project and for ensuring that the requirements of CEQA have been met.

Table ES-1, presented at the end of this chapter, provides a summary of the environmental impacts of the Project. The table identifies the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after implementation of the mitigation measures.

For detailed discussions of all Project impacts and mitigation measures, the reader is referred to the topical environmental analysis in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures." Cumulative impacts are discussed in Chapter 4, "Cumulative Impacts."

### ES.4 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Implementing the Project would result in the following significant and unavoidable impacts:

- ▶ Impact 3.12-3: Increased Demand for New Public School Facilities
- ▶ Impact 3.13-1: Result in an Exceedance of City of Elk Grove General Plan VMT Thresholds
- ▶ Impact 4-20: Cumulative Public School Impacts
- ▶ Impact 4-22: Cumulative Impacts on Vehicle Miles Traveled

### ES.5 ALTERNATIVES TO THE PROPOSED PROJECT

The following alternatives are evaluated in this Draft SEIR. The reader is referred to Chapter 5, "Alternatives," for a further discussion of alternatives.

- ▶ **Alternative 1: No Project Alternative** assumes continued implementation of the City's 2013 Housing Element and the Safety Element as adopted with the 2018 General Plan. No changes would be made to address the requirements of State law. The housing sites would retain their current General Plan land use and zoning designations.
- ▶ **Alternative 2: Reduced Sites Alternative** includes sufficient sites to meet the City's RHNA allocation but would reduce the extent of total housing sites to provide a buffer for the RHNA allocation.

## ES.6 AREAS OF CONTROVERSY

State CEQA Guidelines Section 15123 requires the summary section of a Draft EIR to identify the areas of controversy known to the lead agency, including issues raised by agencies and the public. The areas of controversy associated with the Project are:

- ▶ potential increases in traffic noise; and
- ▶ transportation impacts related to vehicle miles traveled (VMT).

These issues are each addressed in this Draft SEIR. Any impacts related to these issues are identified either as less than significant or as less than significant after mitigation with the exception of the impacts identified under the heading "Significant and Unavoidable Impacts," above. Issues related to impacts identified as significant and unavoidable remain areas of controversy.

## ES.7 ISSUES TO BE RESOLVED

State CEQA Guidelines Section 15123 requires the summary section of a Draft EIR to identify issues to be resolved related to the proposed project. Issues to be resolved by the City are identified below, including issues that will not necessarily be resolved through the SEIR:

- ▶ Should the Housing Element and Safety Element Update be approved as proposed?
- ▶ Should the existing or candidate housing sites identified in the Housing Element Update be modified?
- ▶ Are there any additional policy provisions that should be considered in both element updates?

**Table ES-1 Summary of Impacts and Mitigation Measures**

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact    LTS = Less than significant    PS = Potentially significant    S = Significant    SU = Significant and unavoidable			
<b>Aesthetics</b>			
<p><b>Impact 3.1-1: Potential to Substantially Degrade the Existing Visual Character or Quality of Public Views of the Project Area and Its Surroundings</b>                      The General Plan EIR determined that buildout of the City's Planning Area would cause conversion from a rural/natural character to a more urbanized character and this impact would be significant and unavoidable. Future development associated with the Housing Element Update and implementation of the Safety Element Update would result in the development of high-density residential uses and potential emergency and evacuation access improvements that would be similar in development character that was evaluated in the General Plan EIR, on parcels currently zoned for residential or commercial uses. Therefore, the Project would not result in a new or substantially more severe impacts than were addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with City Municipal Code Chapter 19.12 and Section 23.16.080.	LTS
<p><b>Impact 3.1-2: Potential to Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area</b>                      The General Plan EIR determined that buildout of the City's Planning Area would create substantial new sources of light and glare and the impact would be significant and unavoidable. Future development associated with the Housing Element Update and implementation of the Safety Element Update would create nighttime lighting within the City similar to conditions anticipated for the planned urban land uses for the City under the General Plan. The Project would be subject to the City's General Plan policies, Design Guidelines, and Municipal Code requirements that address lighting and glare; in addition, lighting, including adverse effects of glare and light trespass or spillover light are considerations addressed by the City through the site plan and design review process. All future development in the General Plan Planning Area would be subject to this review process, ensuring that the effects of glare and spillover light would be addressed. Therefore, the Project would not result in a new or substantially more severe impacts than were addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with Municipal Code Chapter 23.56 and Section 23.16.080.	LTS

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<b>Air Quality</b>			
<p><b>Impact 3.2-1: Construction Emissions of Criteria Air Pollutants and Precursors</b>                      The General Plan EIR Impact 5.3.1 determined that development and growth under the General Plan could result in short-term construction emissions that could violate or substantially contribute to a violation of the NAAQS and CAAQS for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. This impact was identified as significant and unavoidable. Implementation of the Housing Element and Safety Element Update could generate construction emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from demolition, material and equipment delivery trips, worker commute trips, and other miscellaneous activities. However, construction activities and emissions from implementation of the Housing Element and Safety Element Update would be similar to what was anticipated under the General Plan EIR and its current land use designations. Subsequent projects would be required to comply with General Plan Policy NR-4-8, which would require that emissions in exceedance of SMAQMD's thresholds of significance be mitigated. Therefore, construction-generated emissions would not result in a new or substantially more severe construction air quality impacts than was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policy NR-4-8 and its standards that require implementation of the SMAQMD Basic Construction Emission Control Practices.	LTS
<p><b>Impact 3.2-2: Long-Term Operational Emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub></b>                      General Plan EIR Impact 5.3.2 and 5.3.6 determined that long-term operational emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> would be substantial and could substantially contribute to a violation of the NAAQS and CAAQS for ozone and PM and conflict with air quality attainment efforts. This impact was identified as significant and unavoidable. Implementation of the Housing Element and Safety Element Update could generate long-term operational emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. However, emissions from implementation of the Housing Element and Safety Element Update would be similar to what was anticipated under the General Plan EIR and its current land use designations. Therefore, operational emissions would not result in a new or substantially more severe air quality impacts that was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policy NR-4-1, Policy MOB-1-1, and Standard MOB-3-2a, and Municipal Code Sections 16.07.200 through 16.07.500 and 23.58.120.	LTS

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<p><b>Impact 3.2-3: Exposure of Sensitive Receptors to Substantial Carbon Monoxide Pollutant Concentrations</b></p> <p>The General Plan EIR concluded that the Project would not contribute to localized concentrations of mobile-source CO impacts. Implementation of the Housing Element and Safety Element Update would include different land uses and would distribute vehicle trips throughout the City; however, this redistribution would not result in a new impact. Based on modeling performed for this analysis, the maximum number of housing sites proposed under the Housing Element Update could generate a maximum of 32,600 daily trips; however, the trips would be distributed throughout the City and into the region and would not be focused within one intersection exclusively. Therefore, there is no new effect and the impact is not substantially more severe than the impact identified in the General Plan. This impact would remain less than significant as identified in the General Plan EIR.</p>	LTS	No mitigation is required.	LTS
<p><b>Impact 3.2-4: Exposure of Sensitive Receptors to TACs</b></p> <p>The General Plan EIR concluded that operational-related emissions of mobile source TACs would result in significant and unavoidable impacts to public health. Implementation of the Housing Element and Safety Element Update could generate mobile source TACs. However, these TAC emissions would be similar to what was anticipated under buildout conditions as described in the General Plan EIR and its current land use designations. Therefore, potential TAC mobile emissions would not result in a new or substantially more severe TAC impacts that was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policies NR-2-4, NR-4-9, NR-4-10, MOB-3-1, MOB-3-2, MOB-3-5, MOB-3-6, MOB-3-7, MOB-3-13, and MOB-7-5.	LTS
<p><b>Archaeological, Historical, and Tribal Cultural Resources</b></p>			
<p><b>Impact 3.2-1: Construction Emissions of Criteria Air Pollutants and Precursors</b></p> <p>The General Plan EIR Impact 5.3.1 determined that development and growth under the General Plan could result in short-term construction emissions that could violate or substantially contribute to a violation of the NAAQS and CAAQS for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. This impact was identified as significant and unavoidable. Implementation of the Housing Element and Safety Element Update could generate construction emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from demolition, material and equipment delivery trips, worker commute trips, and other miscellaneous activities. However, construction activities and emissions from implementation of the Housing Element and Safety Element Update would be similar to what was anticipated under the General Plan EIR and its current land use</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policy NR-4-8 and its standards that require implementation of the SMAQMD Basic Construction Emission Control Practices.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
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<p>designations. Subsequent projects would be required to comply with General Plan Policy NR-4-8, which would require that emissions in exceedance of SMAQMD's thresholds of significance be mitigated. Therefore, construction-generated emissions would not result in a new or substantially more severe construction air quality impacts than was addressed in the General Plan EIR. Project impacts would be less than significant.</p>			
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<p><b>Impact 3.2-4: Exposure of Sensitive Receptors to TACs</b>                      The General Plan EIR concluded that operational-related emissions of mobile source TACs would result in significant and unavoidable impacts to public health. Implementation of the Housing Element and Safety Element Update could generate mobile source TACs. However, these TAC emissions would be similar to what was anticipated under buildout conditions as described in the General Plan EIR and its current land use designations. Therefore, potential TAC mobile emissions would not result in a new or substantially more severe TAC impacts that was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policies NR-2-4, NR-4-9, NR-4-10, MOB-3-1, MOB-3-2, MOB-3-5, MOB-3-6, MOB-3-7, MOB-3-13, and MOB-7-5.	LTS
<p><b>Archaeological, Historical, and Tribal Cultural Resources</b></p>			
<p><b>Impact 3.3-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource</b>                      General Plan EIR Impact 5.5.1 determined that implementation of the General Plan could result in impacts to historical resources and identified that implementation of Mitigation Measure 5.5.1a would reduce this impact to a less-than-significant level. Future development associated with the Housing Element and Safety Element Update could be located on properties that contain previously unevaluated historic-age buildings or structures which could result in damage to or destruction to these features. If they are found to be eligible for listing in the NRHP, CRHR, or the Elk Grove Register of Historic Resources, the impact to historical resources would be potentially significant. However, all projects within the city would be subject to adopted General Plan Mitigation Measure 5.5.1a. Therefore, there is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR. The Project would result in a less-than-significant impact to historical resources.</p>	LTS	No new mitigation is required beyond compliance with General Plan Policy HR-2-1 and implementation of adopted General Plan Mitigation Measure 5.5.1a.	LTS
<p><b>Impact 3.3-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources</b>                      General Plan EIR Impact 5.5.1 determined that implementation of the General Plan could result in significant impacts to archaeological resources and identified that implementation of Mitigation Measures 5.5.1a and 5.5.1b would reduce this impact to a less-than-significant level. Future development associated with the Housing Element and Safety Element Update could be located on properties that contain known or unknown archaeological resources and ground-disturbing activities could result in discovery or damage of yet undiscovered archaeological resources</p>	LTS	No new mitigation is required beyond implementation of adopted General Plan EIR Mitigation Measures 5.5.1a and 5.5.1b.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
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as defined in CEQA Guidelines Section 15064.5. This would be a potentially significant impact. However, all projects within the City would be subject to adopted General Plan Mitigation Measures 5.5.1a and 5.5.1b. Therefore, there is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR. The Project would result in a less-than-significant impact to archaeological resources.			
<p><b>Impact 3.3-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource</b></p> <p>Because no California Native American tribes responded to AB 52 notification letters, no tribal cultural resources were identified. It is possible that tribal cultural resources could be identified during analysis of subsequent projects associated with the Housing Element or Safety Element Update. General Plan EIR Impact 5.5.1 determined that implementation of the General Plan could result in impacts to tribal cultural resources and identified that implementation of Mitigation Measures 5.5.1a and 5.5.1b would be required. However, compliance with PRC Section 21080.3.2 and Section 21084.3 (a) would make this impact less than significant. Therefore, there is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR. The Project would result in a less-than-significant impact to tribal cultural resources.</p>	LTS	No additional mitigation is required beyond compliance with California PRC 21081.3 and implementation of adopted Mitigation Measures 5.5.1a and 5.5.1b.	LTS
<p><b>Impact 3.3-4: Disturb Human Remains</b></p> <p>Un-marked human interments are known to exist in Elk Grove and the surrounding area. It is possible that ground-disturbing construction activities associated with the Housing Element and Safety Element Update could uncover previously unknown human remains. General Plan EIR Impact 5.5.1 determined that implementation of the General Plan could result in impacts to tribal cultural resources and identified that implementation of Mitigation Measure 5.5.1b would be required. However, compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 would make this impact less than significant. Therefore, there is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR. The Project would result in a less-than-significant impact to human.</p>	LTS	No additional mitigation is required beyond compliance with California Health and Safety Code Section 7050.5 and California PRC Section 5097.	LTS

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<b>Biological Resources</b>			
<p><b>Impact 3.4-1: Result in Disturbance or Loss of Special-Status Plant Species or Habitat</b>                      General Plan EIR Impact 5.4.1 identified significant and unavoidable impacts to special status plant species and habitat. Potential land use conversion and development as part of implementation of the Housing Element and Safety Element Update could result in disturbance to or loss of several special-status plant species if they are present. The loss of special-status plants could substantially affect the abundance, distribution, and viability of local and regional populations of these species. Implementation of General Plan standards and policies would address impacts on special-status plants as a result of land conversion, ground disturbance, and construction because they would require a biological resources evaluation to identify special-status plants, avoidance of sensitive habitats where special-status plants are known or may occur, and implementation of appropriate mitigation to preserve and enhance habitat that supports special-status plants, or compensate for loss of occupied habitat if preservation is not possible as required by local, state, and federal law. The Housing Element and Safety Element Update would not result in a new or substantially more severe impact to special-status plant species that was addressed in the General Plan EIR because it would not substantially expand the overall planned development footprint of the City and would be subject to City policy provisions. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with City General Plan policies NR-1-2, NR-1-4, and standards NR-1.2a and NR-1.2c as well as through permitting by CDFW and USFWS.	LTS
<p><b>Impact 3.4-2: Result in Disturbance or Loss of Special-Status Wildlife Species or Habitat</b>                      General Plan EIR Impacts 5.4.1 and 5.4.2 identified significant and unavoidable impacts to special status wildlife species and habitat. Potential land use conversion and development as part of the Housing Element and Safety Element Update implementation may include ground disturbance, tree removal, and construction of new buildings and infrastructure, which may result in disturbance to or of loss of special-status wildlife species and reduced breeding productivity of these species. Implementation of General Plan standards and policies would reduce significant impacts on special-status wildlife as a result of land conversion, ground disturbance, and construction because they would require a biological resources evaluation to identify special-status wildlife, avoidance of sensitive habitats where special-status wildlife may occur, and implementation of appropriate mitigation to preserve and enhance habitat that supports special-status wildlife, or compensate for loss of habitat, as required by local, state, and federal law. The Housing Element</p>	LTS	No additional mitigation is required beyond compliance with City General Plan policies NR-1-2, NR-1-4, and standards NR-1.2b and NR-1.2c, City Municipal Code Chapter 16.130, and through permitting by CDFW and USFWS.	LTS

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and Safety Element Update would not result in a new or substantially more severe impact to special-status wildlife species that than was addressed in the General Plan EIR because it would not substantially expand the overall planned development footprint of the City and would be subject to City policy provisions. Project impacts would be less than significant.			
<p><b>Impact 3.4-3: Result in Degradation or Loss of State or Federally Protected Wetlands, Including Vernal Pools</b></p> <p>General Plan EIR Impact 5.4.3 identified less than significant impacts to wetlands through compliance with existing federal, state, and local regulations and General Plan policy provisions. Implementation of the Housing Element and Safety Element Update may include ground disturbance, vegetation removal, and habitat conversion, which may result in degradation (e.g., inadvertent fill) or loss of State or federally protected wetlands, including vernal pools. Implementation of existing federal, state, and local regulations and General Plan policy provisions would reduce significant impacts on state and federally protected wetlands as a result of land conversion, ground disturbance, and construction because they would require a biological resources evaluation to identify sensitive habitats, avoidance of wetlands, vernal pools, marshland, and riparian areas, and implementation of appropriate mitigation to preserve and enhance these habitats as required by local, state, and federal law. The Housing Element and Safety Element Update would not result in a new or substantially more severe impact to wetland resources than was addressed in the General Plan EIR because it would not substantially expand the overall planned development footprint of the City and would be subject to City policy provisions. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with City General Plan policies NR-1-2, NR-1-4, and standards NR-1.2b and NR-1.2c and through permitting by CDFW and USFWS.	LTS
<p><b>Impact 3.4-4: Conflict with Local Policies and Ordinances</b></p> <p>Implementation of the Housing Element and Safety Element Update would be required comply with City of Elk Grove Municipal Code Chapter 19.12 Tree Preservation and Protection, which would require preparation of an arborist report if subsequent projects contain trees that would be removed, as well as identification and protection measures for trees of local importance. The Housing Element and Safety Element Update would not result in a new or substantially more severe impacts that was addressed in the General Plan EIR because it would not expand the overall planned development footprint of the City. Project impacts would be less than significant.</p>	LTS	No additional mitigation beyond compliance with the General Plan and the City Municipal Code Chapter 19.13.	LTS

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<b>Energy</b>			
<p><b>Impact 3.5-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy during Project Construction or Operation</b></p> <p>The General Plan EIR evaluated the energy consumption associated with the land uses proposed under the General Plan and concluded that energy consumption would not be wasteful, inefficient, or unnecessary because development would be required to comply with the most recent versions of the California Energy Code and actions under the Elk Grove CAP that include zero net energy requirements in 2020 and 2030 for residential and commercial development. Implementation of the Housing Element and Safety Element Update could result in the consumption of additional energy supplies during construction in the form of gasoline and diesel fuel consumption; however, this energy expenditure would not be considered wasteful when compared to other construction projects. Operation of housing sites under the Housing Element Update would also result in additional energy consumption but would be required to comply with the most recent version of the California Energy Code and the CAP. Implementation of the Housing Element and Safety Element Update would be required to comply with these standards and would not result in a new or substantially more severe energy impacts that was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with the City’s CAP and the 2019 California Energy Code and any subsequent code updates.	LTS
<p><b>Impact 3.5-2: Conflict with or Obstruction of a State or Local Plan for Renewable Energy or Energy Efficiency</b></p> <p>The General Plan EIR evaluated consistency with applicable state or local plans for renewable energy and energy efficiency and concluded that the land use under the General Plan would not conflict with an applicable plan. Implementation of the Housing Element and Safety Element Update could increase energy demands compared to existing conditions; however, development would be required to comply with applicable California Energy Code. Additionally, the City’s CAP contains several measures that would apply to the housing sites that would reduce overall energy demand. As a result, implementation of the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the Housing Element and Safety Element Update would not have a more severe impact than what was identified in the General Plan EIR. This impact would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with the City’s CAP, including measures BE-1, BE-5, BE-6, BE-7, BE-8, and ACM-5, and Municipal Code Chapter 16.07 and Section 23.58.120.	LTS

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<b>Energy</b>			
<p><b>Impact 3.5-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy during Project Construction or Operation</b></p> <p>The General Plan EIR evaluated the energy consumption associated with the land uses proposed under the General Plan and concluded that energy consumption would not be wasteful, inefficient, or unnecessary because development would be required to comply with the most recent versions of the California Energy Code and actions under the Elk Grove CAP that include zero net energy requirements in 2020 and 2030 for residential and commercial development. Implementation of the Housing Element and Safety Element Update could result in the consumption of additional energy supplies during construction in the form of gasoline and diesel fuel consumption; however, this energy expenditure would not be considered wasteful when compared to other construction projects. Operation of housing sites under the Housing Element Update would also result in additional energy consumption but would be required to comply with the most recent version of the California Energy Code and the CAP. Implementation of the Housing Element and Safety Element Update would be required to comply with these standards and would not result in a new or substantially more severe energy impacts that was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with the City’s CAP and the 2019 California Energy Code and any subsequent code updates.	LTS
<p><b>Impact 3.5-2: Conflict with or Obstruction of a State or Local Plan for Renewable Energy or Energy Efficiency</b></p> <p>The General Plan EIR evaluated consistency with applicable state or local plans for renewable energy and energy efficiency and concluded that the land use under the General Plan would not conflict with an applicable plan. Implementation of the Housing Element and Safety Element Update could increase energy demands compared to existing conditions; however, development would be required to comply with applicable California Energy Code. Additionally, the City’s CAP contains several measures that would apply to the housing sites that would reduce overall energy demand. As a result, implementation of the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the Housing Element and Safety Element Update would not have a more severe impact than what was identified in the General Plan EIR. This impact would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with the City’s CAP, including measures BE-1, BE-5, BE-6, BE-7, BE-8, and ACM-5, and Municipal Code Chapter 16.07 and Section 23.58.120.	LTS

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<b>Geology and Soils</b>			
<p><b>Impact 3.6-1: Result in Substantial Soil Erosion</b>                      The General Plan EIR determined that the potential for erosions resulting from future development activities would be mitigated to a less-than-significant level through implementation of City Municipal Code Chapter 16.44 and the requirements of NPDES Permit Number CA0082597 that provides standards for erosion control. Grading and excavation activities resulting from implementation of the Housing Element and Safety Element Update would be required to comply with these standards and would not result in a new or substantially more severe impact to soil erosion that was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with City Municipal Code Chapter 16.44 and the requirements of NPDES Permit Number CA0082597.	LTS
<p><b>Impact 3.6-2: Locate Project Facilities on Expansive or Unstable Soils, Creating Substantial Risks to Life or Property</b>                      General Plan EIR Impact 5.6.3 determined that potential impacts from unstable soils on future development activities would be mitigated to a less-than-significant level through compliance with the CBC that is implemented by Chapter 16.04 of the Municipal Code through special design and construction methods. Implementation of the Housing Element and Safety Element Update would be required to comply with these standards and would not result in a new or substantially more severe soil stability impacts that was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with Municipal Code Chapter 16.04 which implements the CBC.	LTS
<p><b>Impact 3.6-3: Loss of a Unique Paleontological Resource or Geologic Feature</b>                      General Plan EIR Impact 5.6.5 identified that implementation of the General Plan could result in impacts to paleontological resources and identified that implementation of Mitigation Measure 5.6.5 would reduce this impact to a less-than-significant level. All projects within the City would be subject to adopted General Plan Mitigation Measure 5.6.5. Grading and excavation activities resulting from implementation of the Housing Element and Safety Element Update would be required to comply with this mitigation measure and would not result in a new or substantially more severe impact to paleontological resources that what was addressed in the General Plan EIR. With implementation of adopted General Plan Mitigation Measure 5.6.5, the project would result in a less-than-significant impact to paleontological resources.</p>	LTS	No new mitigation is required beyond implementation of adopted General Plan EIR Mitigation Measure 5.6.5.	LTS

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<b>Greenhouse Gas Emissions and Climate Change</b>			
<p><b>Impact 3.7-1: Project-Generated GHG Emissions</b>                      The General Plan EIR determined that GHG-related impacts would be less than significant through the incorporation of GHG reduction actions included in the General Plan and 2019 CAP (Impact 5.7.1) but would not likely meet long term reduction goals under Executive Order S-3-05 and result in a significant and unavoidable impact (Impact 5.7.2). Construction and operation of the existing and candidate housing sites under the Housing Element Update would generate an estimated 35,769 MTCO<sub>2</sub>e/year in 2030, the assumed first full year of Project operation. Consistent with the findings of the General Plan EIR, new housing resulting from the implementation of the Housing Element Update would be subject to the policies contained in the 2019 CAP and 2019 General Plan, which would demonstrate consistency with statewide GHG reduction goals set forth by SB 32. Implementation of the Housing Element Update would introduce housing sites of greater density and development beyond what was included in the General Plan as analyzed in the General Plan EIR. The Project, as it includes as a component of the General Plan, would alter the rate that operational emissions would be generated. However, because the residential development under the Housing Element Update would be subject to applicable measures in the CAP, Project emissions would be reduced consistent with statewide GHG reduction goals by 2030. This impact would not result in a new or substantially more severe impact than what was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with Measures BE-1, BE-4, BE-5, BE-6, BE-7, BE-8, and ACM-5 from the 2019 CAP and Municipal Code Chapter 16.07 and Section 23.58.120.	LTS
<b>Hazards and Hazardous Materials</b>			
<p><b>Impact 3.8-1: Risks to Human Health and the Environment Resulting from the Routine Use, Transport, Storage, and Disposal of Hazardous Materials or the Accidental Release of Hazardous Materials</b>                      General Plan EIR Impact 5.8.1 determined that potential impacts from the use, transport, storage, and disposal of hazardous materials would be reduced to a less-than-significant level through compliance with General Plan policies and applicable federal, State, and local policies and regulations. Implementation of the Housing Element and Safety Element Update would be required to comply with these standards and would not result in a new or substantially more severe soil stability impacts that was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policies ER-1-1 through ER-1-4 and State regulations including CCR Title 19, Division 2, Chapter 4.5.	LTS

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<p><b>Impact 3.8-2: Locating Hazardous Materials Within One-Quarter Mile of an Existing or Proposed School</b></p> <p>General Plan EIR Impact 5.8.3 evaluated the potential for hazards and hazardous emissions within one-quarter mile of existing or proposed schools and concluded that compliance with General Plan policies as well as applicable regulations would ensure that impacts would not be significant. The Project could result in additional residential development than evaluated in the General Plan EIR. Implementation of the Housing Element and Safety Element Update would be required to comply with regulations and General Plan policies and would not result in a new or substantially more severe impacts that was addressed in the General Plan EIR. This impact would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policies ER-1-1, ER-1-2, ER-1-3, and ER-1-5.	LTS
<p><b>Impact 3.8-3: Development on Land Registered in a List of Hazardous Materials Sites Compiled Pursuant to Government Code Section 65962.5</b></p> <p>General Plan EIR Impact 5.8.2 identified that implementation of the General Plan could result in impacts related to contaminated sites and identified that implementation of Mitigation Measure 5.8.2 would reduce this impact to a less-than-significant level. All projects within the City would be subject to adopted General Plan Mitigation Measure 5.8.2 and all applicable local, State, and federal regulations. Site development activities resulting from implementation of the Housing Element and Safety Element Update would be required to comply with this mitigation measure and would not result in a new or substantially more severe impact to contaminated sites than what was addressed in the General Plan EIR. With implementation of adopted General Plan Mitigation Measure 5.8.2, the project would result in a less-than-significant impact.</p>	LTS	No additional mitigation is required beyond implementation of adopted General Plan EIR Mitigation Measure 5.8.2	LTS
<p><b>Impact 3.8-4: Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan</b></p> <p>The Project would not interfere with the Sacramento County LHMP or the City's EOP. Therefore, this impact would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with Sacramento County LHMP and the City's EOP.	LTS
<p><b>Hydrology and Water Quality</b></p>			
<p><b>Impact 3.9-1: Violate Any Water Quality Standards or Waste Discharge Requirements or Substantially Degrade Surface Water or Groundwater Quality during Construction Activities</b></p> <p>General Plan EIR Impact 5.9.1 determined that potential impacts on water quality from future development activities would be reduced to a less-than-significant level through compliance with all applicable requirements, which could include</p>	LTS	No additional mitigation is required beyond compliance with Municipal Code Chapter 16.44 and the Construction General NPDES Permit.	LTS

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Chapter 16.44 of the Elk Grove Municipal Code and the State’s Construction General NPDES permit. Implementation of the Housing Element and Safety Element Update would be required to comply with these requirements and would not result in a new or substantially more severe water quality impacts than was addressed in the General Plan EIR. Project impacts would be less than significant.			
<p><b>Impact 3.9-2: Violate Any Water Quality Standards or Substantially Degrade Surface Water or Groundwater Quality from Polluted Stormwater Runoff</b>                      General Plan EIR Impact 5.9.1 determined that potential impacts on water quality from polluted stormwater runoff from future development would be reduced to a less-than-significant level through compliance with all applicable regulations and General Plan policies. Implementation of the Housing Element and Safety Element Update would be required to comply with these requirements and would not result in a new or substantially more severe impacts from polluted stormwater runoff than was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with the City’s MS4 permit, General Plan Policies NR-3-2, NR-3-3, and LU-5-12, and Municipal Code Chapter 15.12.	LTS
<p><b>Impact 3.9-3: Substantially Decrease Groundwater Supplies or Interfere Substantially with Groundwater Recharge Such That the Project May Impede Sustainable Groundwater Management</b>                      General Plan EIR Impact 5.9.4 determined that impacts on groundwater supplies from future development under the General Plan would be significant and unavoidable for areas that would be annexed into the City. The Project involves parcels within the City and would not include any annexation activities. While the Project would add additional residential units beyond what was anticipated in the General Plan EIR, the increase in demand for water supply would be minor in comparison with anticipated supply surpluses. Therefore, Project impacts would be less than significant.</p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Impact 3.9-4: Increase Localized Flooding Risk Because of Changes in Site Drainage</b>                      General Plan EIR Impact 5.9.2 determined that potential increases in flooding resulting from future development would be reduced to a less-than-significant level through compliance with all applicable regulations and General Plan policies. Future projects under the Housing Element and Safety Element Update would be required to comply with these requirements and would not result in a new or substantially more severe drainage and flooding impacts than was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with the City’s NPDES MS4 permit requirements and Municipal Code Chapter 16.44.	LTS

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<p><b>Impact 3.9-5: Impede or Redirect Flood Flows</b>                      General Plan EIR Impact 5.9.3 determined that future development under the General Plan within the 100-year and 200-year flood zones could impede or redirect flood flows, but compliance with existing regulations and the proposed General Plan would ensure that impacts would be less than significant. Two of the housing sites (E-15 and C-4) are within the 200-year floodplain. Development proposals for these sites would be subject to the requirements of Municipal Code Section 23.42.040, which would ensure that development would not be approved until findings can be made pursuant to Municipal Code Section 23.42.040.E. Therefore, Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with Municipal Code Section 23.42.040.	LTS
<p><b>Land Use, Planning, Population, and Housing</b></p>			
<p><b>Impact 3.10-1: Induce Substantial Population Growth</b>                      The Housing Element Update would accommodate up to 2,722 net new dwelling units, which would accommodate approximately 8,765 people (based on 3.22 persons per household). This growth would be within the projections generally assumed under the City’s General Plan and regional planning efforts completed by SACOG. This impact would be less than significant.</p>	LTS	No mitigation is required.	LTS
<p><b>Impact 3.10-2: Conflicts with Applicable Land Use Plans, Policies, or Regulations</b>                      The Project would update the Housing Element and Safety Element of the General Plan, amend the General Plan land use map, amend the Laguna Ridge Specific Plan, and revise the Zoning Code. These amendments would ensure compliance with State law requirements for these elements and meet RHNA allocations for the City that were established by SACOG. The Project is consistent with General Plan policies related to environmental protections associated with land use, including those identified under Regulatory Setting that address the amount and location of growth, allowed uses, development densities and intensities, and project design. This impact would be less than significant.</p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Noise and Vibration</b></p>			
<p><b>Impact 3.11-1: Construction Activities Could Result in a Substantial Temporary Increase in Noise Levels at Nearby Noise-Sensitive Land Uses</b>                      The General Plan EIR determined that the potential noise generation from construction activities could result in a substantial temporary increase in noise levels, but that this impact would be reduced through adherence to the Municipal Code and General Plan Policy N-1-7, and that in some cases the City could require</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policy N-1-8 and Municipal Code Section 6.32.100 and the Elk Grove Construction Specifications Manual.	LTS

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<p>a site-specific assessment and mitigation to reduce construction noise. The General Plan EIR concluded this impact would be less than significant. Construction activities associated with implementation of the Housing Element and Safety Element Updates would be required to comply with these same standards as well as General Plan Policy N-1-8 and would not result in new or substantially more several impacts related to construction noise. Project impacts would be less than significant.</p>			
<p><b>Impact 3.12-2: Traffic Noise</b>                      General Plan EIR Impact 5.10.2 identified that implementation of the General Plan would result in a significant and unavoidable increase in transportation noise, including traffic noise levels along many existing roadways in the City. Further, Impact 5.10.2 notes that the General Plan includes a set of policies that are intended to ensure that new specific proposed development would comply with noise standards and would not adversely impact sensitive land uses from traffic noise. The policies include Policy N-1-1, Policy N-1-2, Policy N-1-4, Policy N-1-5, and Policy N-2-3. Activities resulting from implementation of the Housing Element and Safety Element Update would also be subject to the set of General Plan policies listed above and would not result in a new or substantially more severe impact. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with General Plan policies N-1-1, N-1-4, N-1-5, and N-2-3.	LTS
<p><b>Impact 3.11-3: Future Development Could Expose Existing Noise-Sensitive Land Uses to New Non-Transportation Noise Sources that Could Exceed the City's Applicable Noise Standards</b>                      General Plan EIR Impact 5.10.3 determined that potential noise generation from future development could expose existing noise-sensitive land uses to new non-transportation noise sources that could exceed the City's applicable noise standards. Specific to residential land uses, the General Plan EIR identified lawn and garden equipment, voices, and amplified music as potential noise sources associated with residential land uses. The General Plan EIR identified Section 6.32.110 of the Municipal Code as containing hourly noise standards that apply to non-transportation noise sources. Implementation of the Housing Element Update and Safety Element Update would be required to comply with these standards and would not result in a new or substantially more severe noise impacts than was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policy N-2-1 and Municipal Code Section 6.32.110.	LTS

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<p><b>Impact 3.11-4: Result in Development Projects Involving that Could Expose Receptors to Excessive Groundborne Vibration</b>                      General Plan EIR Impact 5.10.4 determined that potential vibration generation from construction and operation could occur as a result of the project. Long-term vibration was mainly associated with transit system routes and maintenance activities, and vibration from increased traffic would not be perceptible. Short-term vibration associated with construction could be substantial for activities such as pile driving and vibratory rolling. Adherence to Policy N-1.9 was identified as having a mitigating effect on construction vibration. Implementation of the Housing Element Update and Safety Element Update would be required to comply with these standards and would not result in a new or substantially more severe vibration impacts. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policy N-1-9 and Municipal Code Section 6.32.100.	LTS
<b>Public Services and Recreation</b>			
<p><b>Impact 3.12-1: Require Construction of New Fire Protection Facilities, Resulting in Adverse Environmental Impacts</b>                      The General Plan EIR determined that where new growth areas within the City have been identified, new fire stations are planned to accommodate the anticipated growth and no significant impacts would occur. Compliance with applicable regulations and General Plan policies would ensure new fire station siting and resources are available. If new fire protection facilities are proposed, environmental review for the new facility would be conducted as appropriate. Project impacts associated with the construction of needed fire protection facilities would not result in a new or substantially more severe construction impacts than disclosed in the technical sections of the General Plan EIR. Development of housing sites identified in the Housing Element Update would be required to comply with applicable regulations and policies. Implementation of the Safety Element Update could provide additional improvements regarding emergency access and evacuation beyond the current Safety Element. Therefore, impacts related to the provision of fire services would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with Municipal Code Chapter 16.85 and 17.04 and General Plan policies ER-4-1, ER-4-2, SAF-1-3, and SAF-1-4.	LTS
<p><b>Impact 3.12-2: Require Construction of New Law Enforcement Facilities, Resulting in Adverse Environmental Impacts</b>                      General Plan EIR Impact 5.11.1.2 indicated that police services operates out of a centralized facility at the City Hall complex and additional police services to accommodate development can be accomplished through additional personnel and equipment and no significant impacts would occur. Relative to the General</p>	LTS	No additional mitigation is required beyond compliance with General Plan Policy SAF-1-1 .	LTS

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<p>Plan EIR, the Project would not result in new or substantially more severe impacts related to law enforcement. In addition, Elk Grove General Plan Policy SAF-1-1 directs regular monitoring and review of the level of police staffing provided in Elk Grove and ensures that sufficient staffing and resources are available to serve local needs. The addition of new officers and/or administrative staff would not require a new or expanded police facility because EGPD operations would continue within the centralized facility at the City Hall complex and additional police services to accommodate development can be accomplished through additional personnel and equipment. Therefore, impacts related to the provision of law enforcement would be less than significant.</p>			
<p><b>Impact 3.12-3: Increased Demand for New Public School Facilities</b>                      Impact 5.11.3.1 of the General Plan EIR identifies that future development in the City would result in an increase of school-aged children and would require the construction of new public school facilities. As determined by the General Plan EIR, because school facilities would be constructed by the EGUSD the environmental impacts of school construction would be significant and unavoidable. Implementation of the Project would result in a substantial increase in student generation that could require additional school facility needs beyond current General Plan buildout. This would be a substantial increase in impact severity than what was previously identified in General Plan EIR Impact 5.11.3.1. No mitigation measures are available to reduce potentially significant impacts; thus, this impact would be significant and unavoidable.</p>	<p>SU</p>	<p>As stated in the General Plan EIR, no additional feasible mitigation is available beyond compliance with existing laws and General Plan policies, and payment of EGUSD fees. While the EGUSD could and should implement measures to reduce physical environmental effects of school development, the EGUSD is not subject to mitigation adopted by the City. No enforceable measures are available. Therefore, this impact would remain significant and unavoidable as determined in the General Plan EIR.</p>	<p>SU</p>
<p><b>Impact 3.12-4: Require Construction of New Park or Recreation Facilities, resulting in Adverse Environmental Impacts</b>                      Impact 5.11.4.1 of the General Plan EIR identifies that increased development would increase the demand on existing recreational facilities and require the development of new recreational facilities and no significant impacts would occur. Construction of park facilities would be subject to policies, standards, and mitigation measures from the General Plan and the General Plan EIR, or the mitigation identified in project-specific MMRPs. No new or substantially more severe impacts would be associated with implementation of the Project. The impacts of park construction would be less than significant.</p>	<p>LTS</p>	<p>No additional mitigation is required beyond compliance with General Plan policies PT-1-3, PT-1-5, PT-1-6, and PT-1-9, City and CCSO MOU, and City Municipal Code Chapter 22.40.</p>	<p>LTS</p>

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<b>Transportation</b>			
<p><b>Impact 3.13-1: Result in an Exceedance of City of Elk Grove General Plan VMT Thresholds</b></p> <p>General Plan Impact 5.13.2 identified that implementation of the General Plan would result in increased VMT that would be significant and unavoidable. Project-generated VMT per service population associated with some of the housing sites rezoned under the Housing Element Update would result in an exceedance of the City's VMT per service population threshold for the High Density Residential land use designation (i.e., 20.6 VMT). The addition of Project-generated total daily VMT within the City could also result in an exceedance of the established Citywide limit of 6,367,833 VMT. Therefore, implementation of the Project could result in substantially more severe VMT impacts than identified in the General Plan EIR. Implementation of mitigation could potentially reduce the extent of this impact but would not reduce the VMT below the City VMT standards. Implementation of the Safety Element would not result in changes in planned land uses or roadway facilities that would alter VMT. Therefore, the Project would result in a significant and unavoidable impact to VMT.</p>	SU	<p><b>Mitigation Measure 3.13-1: Implement VMT Reduction Strategies</b></p> <p>The City of Elk Grove Transportation Analysis Guidelines includes a set of accepted and recommended VMT reduction strategies shown in Table 3.13-5 [found on page 3.13-13 of Section 3.13, Transportation]. Additionally, Table 3.13-5 shows the range of potential VMT reduction for the housing sites is identified for each category, along with the cross-category maximum that is applicable when multiple strategies are applied in combination. The application of Category E (In-Lieu Fee) is not feasible because such a fee cannot be calculated at this time.</p>	SU
<p><b>Impact 3.13-2: Impacts on Transit, Bicycle, and Pedestrian Facilities</b></p> <p>General Plan EIR Impact 5.13.7 identified that implementation of the General Plan would not result in conflicts with plans, policies, or programs for transit, bicycle, and pedestrian facilities. Implementation of the Housing Element and Safety Element Update would be subject to and implement General Plan policies applicable to transit, bicycle, and pedestrian facilities and service. Additionally, subsequent development projects under the Housing Element would be subject to all applicable City guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities. Therefore, there is no new significant effect and the impact is not more severe than what was addressed in the General Plan EIR . Project impacts would be less than significant.</p>	LTS	<p>No additional mitigation is required beyond compliance with the Bicycle, Pedestrian, and Trails Master Plan and General Plan Policies MOB-1-2, MOB-3-1, MOB-3-7, MOB-3-8, MOB-5-4, MOB-5-6, MOB-5-7, and H-1-3.</p>	LTS

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<p><b>Impact 3.13-3: Substantially Increase Hazards Because of a Design Feature or Incompatible Uses</b>                      No significant design hazard impacts were identified in the General Plan EIR. Implementation of the Housing Element and Safety Element Update would be subject to, and constructed in accordance with, applicable roadway design and safety guidelines and General Plan policies. Therefore, the Project would not increase hazards because of a roadway design feature or incompatible uses and there is no new significant effect and the impact is not more severe than what was addressed in the General Plan EIR. The Project would result in a less-than-significant impact to transportation hazards.</p>	LTS	No additional mitigation is required beyond General Plan Policy MOB-3-10 and compliance with City standards and specifications.	LTS
<p><b>Impact 3.13-4: Result in Inadequate Emergency Access</b>                      The internal circulation network and any changes to the external circulation network associated with the implementation of subsequent projects under the Housing Element Update would be subject to review by the City of Elk Grove and responsible emergency service agencies; thus, ensuring that the Project would be designed to meet all applicable emergency access and design standards and adequate emergency access would be provided. Implementation of the Safety Element Update policies would potentially result in emergency access improvements that would enhance emergency access. There is no new significant effect and the impact is not more severe than what was addressed in the General Plan EIR. The Project would result in a less-than-significant impact.</p>	LTS	No additional mitigation is required beyond compliance with City and Cosumnes Community Services District Fire Department standards.	LTS
<p><b>Utilities and Service Systems</b></p>			
<p><b>Impact 3.14-1: Adverse Impacts on Sufficient Water Supply and Treatment</b>                      General Plan Impact 5.12.1.1 identified significant and unavoidable water supply impacts because of the anticipated new water demand for development outside of the City but within the Study Areas. Implementation of the Housing Element and Safety Element Update could generate additional demand for water supplies from the provision of additional housing. However, the additional demand is minor as compared with existing and projected SCWA water demand, supply, and surplus. Therefore, the additional water demand resulting from the Project would not result in a new or substantially more severe water supply impacts than was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance General Plan Policy INF-1-1.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact    LTS = Less than significant    PS = Potentially significant    S = Significant    SU = Significant and unavoidable			
<p><b>Impact 3.14-2: Adverse Impacts on Wastewater Treatment Capacity</b>                      General Plan EIR Impact 5.12.2.1 evaluated whether implementation of the General Plan would increase demand for wastewater treatment. General Plan EIR Impact 5.12.2.2 evaluated whether implementation of the General Plan would require the construction of new or expanded wastewater infrastructure, which could result in impacts to the physical environmental effects. The analyses both concluded that while the General Plan would increase demand for wastewater treatment, facility plans would have sufficient capacity to serve the additional wastewater. The proposed housing sites that would require redesignation of General Plan land uses under the Housing Element Update could generate approximately 0.04 million gallons per day (mgd) of wastewater beyond the amount anticipated under the adopted General Plan. The SRWTP has been master planned to accommodate additional growth. Therefore, the additional wastewater services resulting from the Project would not result in a new or substantially more severe impacts than was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Impact 3.14-3: Adverse Impacts on Landfill Capacity and Compliance with Applicable Solid Waste Regulations</b>                      General Plan EIR Impact 5.12.3.1 concluded that increased demand for solid waste services associated with implementation of the General Plan would not result in significant environmental impacts. Implementation of the Housing Element Update could result in increased solid waste generation associated with proposed housing sites that would require redesignation of General Plan land uses. There is substantial remaining capacity in the landfills serving local waste haulers, with an average remaining capacity of more than 70 percent. All future projects associated with the Housing Element and Safety Element Update would be required to comply with all applicable solid waste regulations, including the City's Space Allocation and Enclosure Design Guidelines for Trash and Recycling. Therefore, the additional solid waste services resulting from the Project would not result in a new or substantially more severe impacts than was addressed in the General Plan EIR. Project impacts would be less than significant.</p>	LTS	No additional mitigation is required beyond compliance with the City's existing recycling programs and associated regulation, as well as Municipal Code Section 30.70.030(E).	LTS

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