

3.13 TRANSPORTATION

The section summarizes transportation impacts in the City of Elk Grove General Plan area, as described in the General Plan (City of Elk Grove 2019a) and evaluates the potential transportation impacts resulting from implementation of the City of Elk Grove Housing Element and Safety Element Update (Project). This section identifies applicable regulatory requirements and describes the existing transportation system in the vicinity of the Project area. It also evaluates impacts related to the generation of vehicle miles traveled (VMT); bicycle, pedestrian, and transit facilities; transportation hazards; emergency access; and temporary construction resulting from implementation of the proposed Project.

The 2018 City of Elk Grove General Plan Update EIR (General Plan EIR) included Section 5.13, "Transportation," which evaluated the potential effects of the adopted General Plan. The General Plan EIR concluded that there would be less-than-significant impacts related to transportation hazards, emergency access, bicycle facilities, pedestrian facilities, and transit facilities (Impacts 5.13.5, 5.13.6, and 5.13.7). The General Plan EIR concluded that impacts related to VMT impacts would be significant and unavoidable with implementation of all proposed General Plan policies. It was determined that there were no other feasible mitigation measures. The General Plan EIR also concluded that impacts related to traffic operational impacts would be significant and unavoidable with implementation of all feasible mitigation measures. However, pursuant to Senate Bill (SB) 743, Public Resources Code (PRC) Section 21099, and California Code of Regulations (CCR) Section 15064.3(a), generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and a project's effect on automobile delay shall no longer constitute a significant impact under CEQA. Therefore, the transportation analysis here-in evaluates impacts using VMT and does not include level of service (LOS) analysis.

The analysis within this section is based on the analysis and findings of the *Elk Grove Housing Element Update VMT Analysis* memorandum prepared by Fehr & Peers in November 2020, which evaluates the environmental effects of the Project based on the City CEQA significance thresholds contained within the *City of Elk Grove General Plan* and the *City's Transportation Analysis Guidelines*. The *Elk Grove Housing Element Update VMT Analysis* memorandum is included as Appendix D and provides additional detailed data, modeling, and information related to the transportation analysis.

There were no comments related to transportation received in response to the notice of preparation (NOP).

3.13.1 Regulatory Setting

The federal and State regulatory setting for transportation provided on pages 3.13-23 through 3.13-25 of the General Plan EIR remain applicable to this analysis. However, an updated description of the adopted changes to the State CEQA Guidelines pursuant to SB 743 that have occurred subsequent to the approval of the General Plan EIR are described below. Additionally, since certification of the General Plan EIR, changes to the regional and local regulatory setting have occurred. These changes are described in detail below.

FEDERAL

There are no new federal laws or regulations addressing transportation that are relevant to the Project.

STATE

Senate Bill 743

SB 743, passed in 2013, required the Governor's Office of Planning and Research (OPR) to develop new State CEQA guidelines that address traffic metrics under CEQA. As stated in the legislation, upon adoption of the new guidelines, "automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion shall not

be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any.”

In December of 2018, OPR published the most recent version of the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) which provides guidance for VMT analysis. The Office of Administrative Law approved the updated State CEQA Guidelines and lead agencies had an opt-in period until July 1, 2020 to implement the updated guidelines regarding VMT. As of July 1, 2020, implementation of CCR Section 15064.3 of the updated CEQA Guidelines applies statewide.

REGIONAL

SACOG is an association that includes the Counties of El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba, as well as 22 cities, including the City of Elk Grove. As a metropolitan transportation organization, SACOG is required to prepare a long-range transportation plan (the metropolitan transportation plan) for all modes of transportation, including public transit, automobile, bicycle, and pedestrian, every 4 years for the six-county area. In addition to preparing the region’s long-range transportation plan, SACOG assists in planning for transit, bicycle networks, clean air, and airport land uses.

Metropolitan Transportation Plan/Sustainable Communities Strategy

SACOG is responsible for preparing and updating the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and the corresponding Metropolitan Transportation Improvement Program (MTIP) for the six-county Sacramento region. In response to this requirement, SACOG completed the 2020 MTP/SCS. The purpose of the 2020 MTP/SCS is to establish regional access and identify mobility goals; identify present and future transportation needs, deficiencies, and constraints within the transportation system; analyze potential solutions; estimate available funding; and propose investments. On November 18, 2019, the SACOG Board of Directors adopted the 2020 update to the MTP/SCS.

The Congestion Management Process (CMP) and MTP/SCS are developed as a single integrated document. As part of the MTP/SCS, SACOG’s CMP addresses the six-county Sacramento region and the transportation network therein. The CMP focuses on travel corridors with significant congestion and critical access and mobility needs to identify projects and strategies that meet CMP objectives. Transportation projects are nominated by local agencies and analyzed against community priorities identified through public outreach, as well as technical performance and financial constraints.

Metropolitan Transportation Improvement Program

SACOG prepares and adopts the MTIP approximately every 2 years. The MTIP is a short-term listing of surface transportation projects that receive federal funds, are subject to a federally required action, or are regionally significant. SACOG adopted the 2019–22 MTIP in December 2018 (SACOG 2018). The 2019–22 MTIP covers 4 years of programming: federal fiscal years 2019–2022. The project listing in the MTIP provides a detailed description for each individual project in the 2019–22 MTIP, including those in Sacramento County and the City of Elk Grove.

Regional Bicycle, Pedestrian and Trails Master Plan

SACOG approved the *Regional Bicycle, Pedestrian, and Trails Master Plan* in April 2015 (SACOG 2015). It envisions a complete transportation system that supports healthy living and active communities where bicycling and walking are viable and popular travel choices in a comprehensive, safe, and convenient network. The *Regional Bicycle, Pedestrian, and Trails Master Plan* is intended to guide the long-term decisions for the Bicycle and Pedestrian Funding Program. The projects included in this plan are regionally significant projects that require at least partial regional funding. This plan is not fiscally constrained, so it contains at least 20 years’ worth of projects.

LOCAL

City of Elk Grove General Plan

The most recent City General Plan was adopted in December 2019. The Mobility chapter of the General Plan contains policies designed to further the City's mobility strategy. The Mobility chapter incorporates and expands the City's complete streets policies; supports key implementation tools, such as the Bicycle, Pedestrian, and Trails Master Plan, the Transportation Analysis Guidelines, and the Climate Action Plan; and identifies measures to support alternative transportation investments, as well as transit-friendly and active transportation-friendly development (City of Elk Grove 2019a). It should be noted that a project's effect on automobile delay is no longer a consideration when identifying a significant impact under CEQA; thus, City General Plan policies related to intersection and roadway performance are not included here.

The following policies and standards related to transportation are relevant to the CEQA analysis of the Project:

- ▶ **Policy MOB-1-1:** Achieve State-mandated reductions in VMT by requiring land use and transportation projects to comply with the following metrics and limits. These metrics and limits shall be used as thresholds of significance in evaluating projects subject to CEQA.

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.

- (a) **New Development** – Any new land use plans, amendments to such plans, and other discretionary development proposals (referred to as "development projects") are required to demonstrate a 15 percent reduction in VMT from existing (2015) conditions. To demonstrate this reduction, conformance with the following land use and cumulative VMT limits is required:
 - **Land Use** – Development projects shall demonstrate that the VMT produced by the project at buildout is equal to or less than the VMT limit of the project's General Plan land use designation, as shown in Table 6-1 [presented as Table 3.13-1 in this EIR], which incorporates the 15 percent reduction from 2015 conditions.

Table 3.13-1 Vehicle Miles Traveled by Land Use Designation

Land Use Designation	VMT Limit (Daily Per Service Population)
Commercial and Employment Land Use Designations	
Community Commercial	41.6
Regional Commercial	44.3
Employment Center	47.1
Light Industrial/Flex	24.5
Light Industrial	24.5
Heavy Industrial	39.5
Mixed Land Use Designations	
Village Center Mixed Use	41.6
Residential Mixed Use	21.2
Public/Quasi Public and Open Space Land Use Designations	
Parks and Open Space ¹	0.0
Resource Management and Conservation ¹	0.0
Public Services	53.1

Land Use Designation	VMT Limit (Daily Per Service Population)
Residential Land Use Designations	
Rural Residential	34.7
Estate Residential	49.2
Low Density Residential	21.2
Medium Density Residential	20.9
High Density Residential	20.6
Other Land Use Designations	
Agriculture	34.7

Note: VMT = vehicles miles traveled.

¹ These land use designations are not anticipated to produce substantial VMT, because they have no residents and few to no employees. These land use designations therefore have no limit and are exempt from analysis.

Source: City of Elk Grove 2019a

- **Cumulative for Development Projects in the Existing City** – Development projects within the existing (2017) City limits shall demonstrate that cumulative VMT within the City including the project would be equal to or less than the established Citywide cumulative limit of 6,367,833 VMT (total daily VMT).
- **Cumulative for Development Projects in Study Areas** – Development projects located in Study Areas shall demonstrate that cumulative VMT within the applicable Study Area would be equal to or less than the established limit shown in Table 6-2 [presented as Table 3.13-2 in this SEIR].

Table 3.13-2 Study Area Total Vehicle Miles Traveled Daily Limits

Study Area	VMT Limit (Total VMT at Buildout)
North Study Area	37,622
East Study Area	420,612
South Study Area	1,311,107
West Study Area	705,243

Note: VMT = vehicles miles traveled.

Source: City of Elk Grove 2019a

- ▶ **Policy MOB-1-2:** Consider all transportation modes and the overall mobility of these modes when evaluating transportation design and potential impacts during circulation planning.
- ▶ **Policy MOB-1-3:** Strive to implement the roadway performance targets (RPT) for operations of roadway segments and intersections, while balancing the effectiveness of design requirements to achieve the targets with the character of the surrounding area as well as the cost to complete the improvement and ongoing maintenance obligations. The Transportation Network Diagram reflects the implementation of the RPT policy at a macro level; the City will consider the specific design of individual segments and intersections in light of this policy and the guidance in the Transportation Network Diagram.

To facilitate this analysis, the City shall use the following guidelines or targets. Deviations from these metrics may be approved by the approving authority (e.g., Zoning Administrator, Planning Commission, City Council).

(a) Vehicular Design Considerations – The following targets apply to vehicular mobility:

- **Intersection Performance** – Generally, and except as otherwise determined by the approving authority or as provided in this General Plan, the City will seek to achieve, to the extent feasible and desired, the peak-hour delay targets identified in [General Plan] Table 6-3.

- **Roadway Performance** - Generally, and except as otherwise determined by the approving authority or as provided in this General Plan, the City will seek to achieve, to the extent feasible and desired, the average daily traffic design targets identified in [General Plan] Table 6-4.
 - **Pedestrian and Bicycle Performance** – The City will seek the lowest stress scores possible for pedestrian and bicycle performance after considering factors including design limitations and financial implications.
- ▶ **Policy MOB-3-1:** Implement a balanced transportation system using a layered network approach to building complete streets that ensure the safety and mobility of all users, including pedestrians, cyclists, motorists, children, seniors, and people with disabilities.
- ▶ **Policy MOB-3-2:** Support strategies that reduce reliance on single-occupancy private vehicles and promote the viability of alternative modes of transport.
 - **Standard MOB-3-2.a:** Require new development to install conduits for future installation of electric vehicle charging equipment.
- ▶ **Policy MOB-3-3:** Whenever capital improvements that alter street design are being performed within the public right-of-way, retrofit the right-of-way to enhance multimodal access to the most practical extent possible.
- ▶ **Policy MOB-3-7:** Develop a complete and connected network of sidewalks, crossings, paths, and bike lanes that are convenient and attractive, with a variety of routes in pedestrian-oriented areas.
- ▶ **Policy MOB-3-8:** Provide a thorough and well-designed wayfinding signage system to help users of all modes of travel navigate the City in an efficient manner.
- ▶ **Policy MOB-3-10:** Design and plan roadways such that the safety of the most vulnerable user is considered first using best practices and industry design standards.
- ▶ **Policy MOB-3-11:** Consider the safety of schoolchildren as a priority over vehicular movement on all streets within the context of the surrounding area, regardless of street classifications. Efforts shall specifically include tightening corner-turning radii to reduce vehicle speeds at intersections, reducing pedestrian crossing distances, calming motorist traffic speeds near pedestrian crossings, and installing at-grade pedestrian crossings to increase pedestrian visibility.
- ▶ **Policy MOB-3-12:** Provide for safe and convenient paths and crossings along major streets within the context of the surrounding area, taking into account the needs of the disabled, youth, and the elderly.
- ▶ **Policy MOB-3-13:** Continue to design streets and approve development applications in a manner that reduces high traffic flows and parking demand in residential neighborhoods.
- ▶ **Policy MOB-3-17:** Ensure new multifamily and commercial developments provide bicycle parking and other bicycle support facilities appropriate for the users of the development.
- ▶ **Policy MOB-4-1:** Ensure that community and area plans, specific plans, and development projects promote context-sensitive pedestrian and bicycle movement via direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area. This may include convenient pedestrian and bicycle connections to public transportation.
- ▶ **Policy MOB-5-1:** Support a pattern of land uses and development projects that are conducive to the provision of a robust transit service. Consider amendments to the land use plan, as appropriate, that increase the density and intensity of development along the City's fixed transit alignment and other major transit corridors.
- ▶ **Policy MOB-5-4:** Support mixed-use and high-density development applications close to existing and planned transit stops.
- ▶ **Policy MOB-5-6:** The City shall work to incorporate transit facilities into new private development and City project designs including incorporation of transit infrastructure (e.g. electricity and fiber-optic cable), alignments for transit route extensions, new station locations, bus stops, and transit patron waiting area amenities (e.g. benches and real-time traveler information screens).

- ▶ **Policy MOB-5-7:** Provide the appropriate level of transit service in all areas of Elk Grove, through fixed-route service in urban areas, and complementary demand response service in rural areas, so that transit-dependent residents are not cut off from community services, events, and activities.
- ▶ **Policy MOB-7-4:** Require new development projects to provide funding or to construct roadway/intersection improvements to implement the City's Transportation Network Diagram. The payment of adopted roadway development or similar fees, including the City Roadway Fee Program and the 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 NR-4-4:** Promote pedestrian/bicycle access and circulation to encourage residents to use alternative modes of transportation in order to minimize direct and indirect emissions of air contaminants.
- ▶ **Policy NR-4-5:** Emphasize demand management strategies that seek to reduce single-occupant vehicle use in order to achieve State and federal air quality plan objectives.

City of Elk Grove Transportation Analysis Guidelines

The *City of Elk Grove Transportation Analysis Guidelines* (City of Elk Grove 2019b) establish the protocol for transportation analysis studies and reports based on the current state-of-the-practice in transportation planning and engineering. As detailed above, a project's effect on automobile delay is no longer a consideration when identifying a significant impact under CEQA; thus, the portions of the *Transportation Analysis Guidelines* not directly applicable to CEQA are not included here. The *Elk Grove Housing Element Update VMT Analysis* memorandum is included as Appendix D and addresses the VMT-based CEQA analysis criteria detailed in the *Transportation Analysis Guidelines*.

The *Transportation Analysis Guidelines* includes guidance for transportation analysis as it pertains to the City General Plan VMT policy significance thresholds (i.e., General Plan Policy MOB-1-1) for CEQA analysis of future projects. The *Transportation Analysis Guidelines* include guidance and requirements for VMT analysis of development projects, including project screening, analysis methodology, significance criteria, impact assessment, and mitigation strategies.

The *Transportation Analysis Guidelines* and City General Plan specify total daily VMT and VMT per service population as the basis for VMT analysis. The following describes these two VMT metrics and their intended use:

- ▶ **VMT per service population:** Includes the sum of all VMT produced by individual land uses in a project, divided by the sum of total residents living in the project. The VMT per service population metric is used to assess a project against specific land use VMT limits. The Project includes multi-family residential land uses; and thus, the Project is compared to the high density residential VMT limit.
- ▶ **Total daily VMT:** Includes the sum of all daily VMT produced by all uses within the City and the applicable Study Area. Since the Project is located exclusively within the City limits, the Citywide cumulative VMT limit that is outlined in Policy MOB-1-1(a)(ii) is used to assess the Project; the study area VMT limits are not considered. The City refers to this as the cumulative VMT impact.

Additional details related to the VMT calculation process are included in Appendix E of the City of Elk Grove *Transportation Analysis Guidelines*.

The *Transportation Analysis Guidelines* also include guidelines and requirements for multimodal (bicycle, pedestrian, and transit) transportation analysis, hazards related to design, on-site circulation, and construction. However, because specific details about how the housing sites would be developed (e.g., paths, building locations) are unknown at this time, the effects are addressed programmatically in Section 3.13.3, "Environmental Impacts and Mitigation Measures."

City of Elk Grove Bicycle, Pedestrian, and Trails Master Plan

In July 2014, the City Council adopted the *Bicycle, Pedestrian, and Trails Master Plan* (City of Elk Grove 2014), which is intended to guide and influence pedestrian, bicycle, and trail policies, programs, and development standards to make biking and walking in the City more safe, comfortable, convenient, and enjoyable for all community members. The

ultimate goal of the master plan is to increase the number of persons who walk and bicycle for transportation to work, school, and errands and for recreation. The plan identifies existing facilities, opportunities, constraints, and destination points for bicycle users and pedestrians. The *Bicycle, Pedestrian, and Trails Master Plan* is currently being updated by the City. Subsequent development and projects associated with implementation of the Housing Element and Safety Element Update would be subject to the most recent adopted version of this document at the time of project consideration.

3.13.2 Environmental Setting

This section describes the existing environmental setting, which is the baseline scenario against which Project-specific impacts are evaluated. The environmental setting for transportation includes descriptions of roadway, transit, bicycle, and pedestrian facilities.

The portions of the existing setting related to travel characteristics, roadway system – roadway characteristics, bicycle and pedestrian facilities, and transit facilities provided on pages 5.13-1 through 5.13-22 of the General Plan EIR remain applicable to this analysis.

ROADWAY SYSTEM

The roadway network serving the City consists of the following roadway classifications:

- ▶ **Principal arterials:** Principal arterials provide limited access on high-speed roads with a limited number of driveways and intersections. Principal arterials also allow bicycles, and pedestrians may be permitted in limited locations. Principal arterials are generally designed for longer trips at the county or regional level.
- ▶ **Major arterials:** Major arterials provide controlled access for all transportation modes to enter and leave the urban area. In addition, significant intra-area travel, such as between residential areas and commercial or business areas, should be served by this system. Major arterials can include sidewalks for pedestrian connections, linking land uses to transit. They may have street parking or bike lanes. Arterials range in size from two to eight lanes. Major arterials in the rural area are subject to the separate Rural Roads Improvement Standards and may have separate pedestrian pathways, but no sidewalks.
- ▶ **Minor arterials/collectors:** Minor arterials/collectors are two-lane roadways providing access to all transportation modes, with a focus on local access. Pedestrian connections link land uses to local destinations and transit. The right-of-way associated with arterials/collectors may feature medians, parking lanes, and bike lanes. Arterials/collectors in the rural area are subject to the separate Rural Roads Improvement Standards and may have separate pedestrian and multiuse pathways, but no sidewalks, and may have reduced speed requirements. This classification also includes primary and secondary residential streets.
- ▶ **Local roads:** Local roads provide direct access to most properties and provide access to the higher roadway classifications described above. They are generally designed to discourage through traffic. Local roads are typically two lanes and are designed for low vehicle speeds. In the urban area of the City, they include pedestrian sidewalks. In the rural area, there are no sidewalks.

TRANSIT SYSTEM

Transit within the City consists of the City e-tran fixed-route bus system, operated under contract to the City by Sacramento Regional Transit. E-tran service operates both local and commuter services, and routes are coordinated with buses, light rail, and South County Transit/Link to areas outside Elk Grove. E-tran operates seven local routes within Elk Grove and 10 commuter routes with service to downtown Sacramento and Rancho Cordova. E-tran also operates a paratransit service called e-van that addresses federal Americans with Disabilities Act (ADA) requirements for fixed-route service and primarily serves ADA-eligible passengers.

BICYCLE AND PEDESTRIAN SYSTEM

The bicycle network serving the City consists of the following bicycle facility classifications:

- ▶ **Class I Bike Paths:** Class I bike paths provide a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross-flow minimized.
- ▶ **Class II Bike Lanes:** Class II bike lanes are striped lanes for one-way bike travel on a street or highway.
- ▶ **Class III Bike Routes:** Class III bike routes provide for shared use with pedestrians or motor vehicle traffic.
- ▶ **Class IV Bikeways:** Class IV bikeways are on-street bike lanes that are physically separated from the adjacent general travel lane.

The bicycle network in the City primarily consists of Class II bicycle lanes that are striped for one-way bicycle travel; however, there are several Class I bike paths, particularly along area creeks and drainage channels. The City has also started to implement new Class IV bikeways along select corridors, including Franklin Boulevard.

3.13.3 Environmental Impacts and Mitigation Measures

This section describes the analysis techniques, assumptions, and results used to identify impacts of the Project on the transportation system. Transportation impacts are described and assessed, and mitigation measures are recommended for impacts identified as significant or potentially significant.

METHODOLOGY

The following methodologies were used to evaluate impacts of the Project.

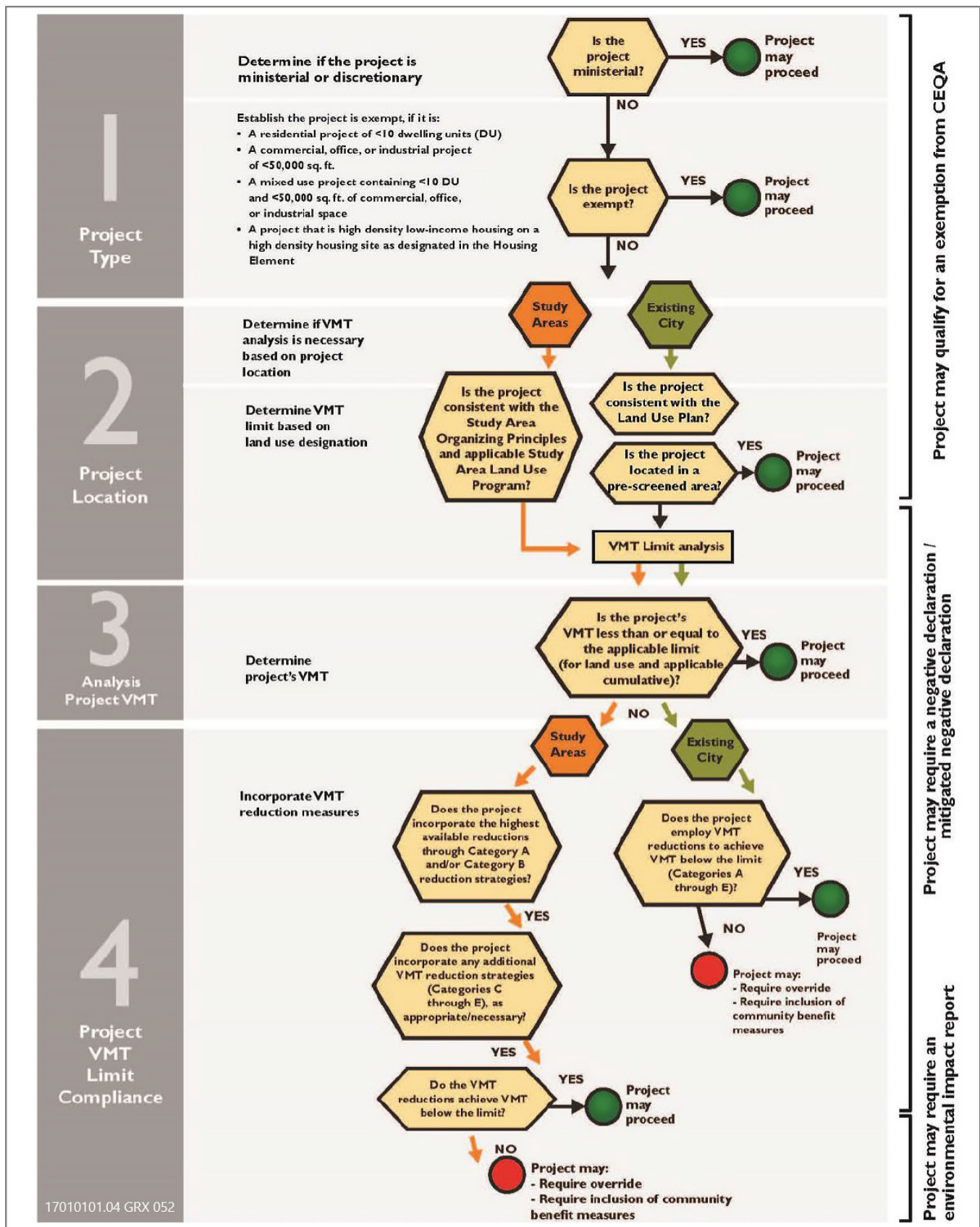
VMT Analysis Methodology

The City uses VMT per service population and total daily VMT as the basis for VMT analysis. The two VMT metrics and their intended application to project-level VMT analysis are described in Section 3.13.1, "Regulatory Setting," above.

The City desires to achieve a reduction in VMT through a combination of land use and mobility actions and has developed a VMT analysis process for projects depicted in Figure 3.13-1. The VMT analysis process for projects as detailed in Figure 3.13-1 includes the following four steps:

- ▶ Step 1 (Project Type) – Determine if the project is ministerial or discretionary or if the project is exempt from VMT analysis.
- ▶ Step 2 (Project Location) – Determine if VMT analysis is necessary based on project location and determine the Project's VMT limit by land use designation.
- ▶ Step 3 (Analyze Project VMT) – Determine the Project's VMT and compare to the VMT limit by land use designation (from Step 2) to determine if VMT mitigation is necessary.
- ▶ Step 4 (Project VMT Limit Compliance) – Identify VMT reduction mitigation measures and significance of VMT impacts with mitigation.

Project-generated VMT was estimated using a modified version of SACOG's 2016 SACSIM regional travel demand forecasting model developed for the analysis of the City General Plan Update (2019) and subsequently updated for clarity. Additional details related to the VMT quantification process and potential limitations of the model are included in Appendix D.



Source: Image produced and provided by the City of Elk Grove in 2019

Figure 3.13-1 VMT Evaluation Process

The VMT analysis evaluated the proposed rezoning of housing sites under the Housing Element Update (see Table 2-2 and 2-3) as well as additional housing site capacity of for up to 7,034 housing units (see Appendix D: scenario 2).

The Safety Element Update policies addresses evacuation routes and identifies residential development in hazards areas with limited access. This update could potentially result in emergency access improvements that would not create vehicle trips that would be subject to the City's VMT standards. Therefore, no VMT analysis of the Safety Element Update is provided.

VMT Impact Analysis

The Project must demonstrate that the Project-generated VMT is within both the land use and cumulative VMT thresholds established in the General Plan such that:

1. VMT per service population at buildout is equal to or less than the VMT per service population limit of the applicable land use designation as defined in Table 6-1 of the City General Plan (presented as Table 3.13-1 in this EIR); and
2. The Project-generated VMT would not cause the City, cumulatively at General Plan buildout, to exceed the City's established total VMT limit for its study area as defined in Table 6-2 of the City General Plan (presented as Table 3.13-2 in this EIR).

THRESHOLDS OF SIGNIFICANCE

The significance criteria used to evaluate Project impacts on transportation under CEQA are based on Appendix G of the State CEQA Guidelines, as well as thresholds of significance adopted in the City General Plan and the City Transportation Analysis Guidelines.

The following describes the significance criteria used to identify impacts on the transportation for the proposed Project.

VMT

An impact on VMT would be significant if implementation of the Project would:

- ▶ result in an exceedance of the VMT limit of the Project's General Plan land use designation (i.e., High Density Residential) of 20.6 daily VMT per service population, as shown in Table 3.13-1, which incorporates the 15-percent reduction from 2015 conditions, or
- ▶ result in an exceedance of the established Citywide cumulative limit of 6,367,833 total daily VMT.

Transit, Bicycle, and Pedestrian Facilities

An impact on transit, bicycle, and pedestrian facilities would be significant if implementation of the Project would:

- ▶ conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Transportation Hazards Related to a Geometric Design Feature or Incompatible Uses

An impact on transportation hazards related to a geometric design feature would be significant if implementation of the Project would:

- ▶ result in designs for on-site circulation, access, and parking areas that fail to meet City or industry standard design guidelines.

Emergency Access

An impact on emergency access would be significant if implementation of the Project would:

- ▶ result in inadequate emergency access.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.13-1: Result in an Exceedance of City of Elk Grove General Plan VMT Thresholds

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.

VMT by Land Use Designation

Subsequent housing projects associated with the implementation of the Housing Element Update would have a General Plan land use designation of High Density Residential; thus, as shown in Table 3.13-1 and Policy MOB-1-1 of the City General Plan, the VMT limit of the Project would be 20.6 daily VMT per service population. As noted above, the Project-generated VMT was modeled outlined above using a modified version of SACOG’s SACSIM regional travel demand forecasting model. The VMT per service population calculations do not incorporate VMT reductions associated with any potential multi-modal improvements that individual development projects would be subject to. Refer to Appendix D for detailed VMT modeling data and technical calculations for the proposed Housing Element Update (Appendix D: scenario 2).

As shown in Table 3.13-3, the average VMT per service population (i.e., residents) associated with the implementation of the Housing Element Update would not exceed the City’s VMT threshold for the High Density Residential land use designation (i.e., 20.6 VMT).

Table 3.13-3 Vehicle Miles Traveled by Land Use Designation Limits – Housing Element Update Buildout Conditions

Land Use Designation	VMT Per Service Population		Limit Exceeded?
	Limit	Buildout Average	
High Density Residential	20.6	19.3	No

Note: VMT = vehicles miles traveled.

Source: Fehr & Peers 2020

Table 3.13-4 identifies housing sites proposed for rezoning that would individually exceed the City’s VMT per service population limit (i.e., 20.6 VMT).

Table 3.13-4 VMT Performance by Site (for sites that individually exceed the VMT limit)

Site ID	VMT Performance				
	Zoning	Dwelling Units	Service Population	Daily VMT	VMT Per Service Population
E-6	SEPA-HDR (25-30)	233	538	11,112	20.7
E-12	SEPA-HDR (25-30)	233	525	11,654	22.2
E-15	RD-30	83	193	4,231	22.0
C-1	RD-30	289	668	13,800	20.7
C-4	RD-30	202	460	9,810	21.3
C-17	RD-30	135	313	6,869	22.0
C-22	RD-25	52	108	2,293	21.3
C-23	RD-25	21	105	2,308	22.0
C-25	RD-25	129	273	5,989	22.0

Source: Fehr & Peers 2020

Citywide VMT Limits

As detailed above and in Policy MOB-1-1 of the City General Plan, projects within the existing (2019) City limits are required to demonstrate that the VMT within the City, including implementation of the Housing Element Update, would be equal to or less than the City’s established total VMT limit of 6,367,833. The proposed housing sites would occur within the City limits; thus, using the same modeling and forecasting tools and data as detailed above, the total daily VMT of the proposed Housing Element Update at full buildout was modeled and is estimated to generate 6,446,861 total VMT at buildout (79,028 above the City limit of 6,367,833). The VMT per service population calculation for the housing sites did not incorporate VMT reductions associated with any potential multi-modal improvements that individual development projects would be subject to. Refer to Appendix D (scenario 2) for detailed VMT modeling data and technical calculations.

Summary

As detailed above, Project-generated VMT per service population would result in an exceedance of the VMT per service population threshold for the High Density Residential land use designation (i.e., 20.6 VMT) for some of the housing sites proposed for rezoning. The increase of total daily VMT within the City resulting from implementation of the Project as a whole would result in an exceedance of the established Citywide limit of 6,367,833 VMT. Therefore, implementation of the Project would result in substantially more severe VMT impacts than identified in the General Plan EIR. Implementation of the Safety Element would not result in changes in planned land uses or roadway facilities that would alter VMT because it would not modify the General Plan transportation plan or modify any existing or otherwise planned transportation facilities.

Implementation of Mitigation Measure 3.13-1 would reduce total daily VMT. However, because it cannot be assured that individual housing sites would be able to achieve their required reduction in total daily VMT within the City, the impact would remain **significant and unavoidable**.

Mitigation Measures

Mitigation Measure 3.13-1: Implement VMT Reduction Strategies

The *City of Elk Grove Transportation Analysis Guidelines* includes a set of accepted and recommended VMT reduction strategies shown in Table 3.13-5. 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.

Table 3.13-5 VMT Reduction Strategies

Strategy Category	Description	Range of Potential VMT Reduction	
		Category	Cross Category
A (Land Use/Location)	Land use-related components such as project density, location, and efficiency related to other housing and jobs; and diversity of uses within the project. Also includes access and proximity to destinations, transit stations, and active transportation infrastructure.	Up to 21.3%	15% Maximum
B (Site Enhancement)	Establishing or connecting to a pedestrian/bike network; traffic calming within and in proximity to the project; car sharing programs; shuttle programs.	Up to 5.7%	
C (Transit System Improvements ¹)	Improvements to the transit system including reach expansion, service frequency, types of transit, access to stations, station safety and quality, parking (park-and-ride) and bike access (to transit itself and parking), last-mile connections.	Up to 10.5%	
D (Commute Trip Reduction ¹)	<u>For residential:</u> transit fare subsidies, education/training of alternatives, rideshare programs, shuttle programs, bike share programs. <u>For employer sites:</u> transit fare subsidies, parking cash-outs, paid parking, alternative work schedules/telecommute, education/training of alternatives, rideshare programs, shuttle programs, bike share programs, end of trip facilities.	Up to 30.0%	
E (In-Lieu fee)	A fee is levied that is used to provide non-vehicular transportation services that connect project residents to areas of employment or vice versa. This service may be provided by the project applicant in cooperation with major employers.	Up to 10.5%	

Note: VMT = vehicles miles traveled.

¹Can be achieved through TDM program measures.

Source: Fehr & Peers 2020

Implement Site Enhancement, Transit System Improvement, and Commute Trip VMT Reduction Strategies

Sites E-6, E-12, E-15, C-1, C-4, C-17, C-22, C-23, and C-25 shall implement one or more of the following VMT reductions strategies documented in the City of Elk Grove Transportation Analysis Guidelines to achieve VMT reductions for the housing sites such that their individual project-level VMT would not exceeded 20.6:

- ▶ Site Enhancement: Establishing or connecting to a pedestrian/bike network; traffic calming within and in proximity to the project; car sharing programs; shuttle programs. The range of potential VMT reduction associated with this strategy is up to 5.7 percent.
- ▶ Transit System Improvements: Improvements to the transit system including reach expansion, service frequency, types of transit, access to stations, station safety and quality, parking (park-and-ride) and bike access (to transit itself and parking), last-mile connections. These reductions can be achieved through TDM program measures. The range of potential VMT reduction associated with this strategy is up to 10.5 percent.
- ▶ Commute Trip Reduction (for residential sites): Transit fare subsidies, education/training of alternatives, rideshare programs, shuttle programs, bike share programs. These reductions can be achieved through TDM program measures. The range of potential VMT reduction associated with this strategy is up to 30 percent.

Application of these VMT reduction strategies shall consist of, prior to approval of design review, the project applicants for subsequent projects preparing and submitting a VMT Reduction Strategy Technical Memorandum to the satisfaction of the Public Works Director (or their designee) documenting the VMT strategies detailed above to reduce the project’s VMT.

Significance after Mitigation

Implementation of Mitigation Measure 3.13-1 would reduce the project-level VMT impact for the specific sites to a less than significant level, but would not address the broader Citywide VMT, which is driven by several factors including land uses on sites adjoining or proximate to the housing sites. Changes in the location and use of land are inconsistent with the Project objectives. An in-lieu fee is not feasible because the specific improvements that would be necessary to mitigate the impact have not been identified. Therefore, the impact to Citywide VMT remains **Significant and unavoidable**.

Impact 3.13-2: Impacts on Transit, Bicycle, and Pedestrian Facilities

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**.

Subsequent projects under the Housing Element would be subject to, and designed in accordance with City plans, policies, and programs for transit, bicycle, and pedestrian facilities. Specifically, implementation of the Housing Element and Safety Element Update would be subject to and implement General Plan and *Bicycle, Pedestrian, and Trails Master Plan* policies applicable to transit, bicycle, and pedestrian facilities and service. Additionally, subsequent project site designs would be required to incorporate improvements consistent with applicable City guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities.

General Plan Policy MOB-1-2 encourages consideration of all transportation modes when evaluating transportation design. Policy MOB-3-1 calls for implementation of a balanced transportation system to ensure the safety and mobility of pedestrians, cyclists, motorists, children, seniors, and people with disabilities. To encourage the use of transit, General Plan Policy MOB-5-4 supports mixed-use and high-density development applications close to existing and planned transit stops, while Policies MOB-5-6 and MOB-5-7 encourage the provision of the appropriate level of transit service in all areas of the City and the extension of bus rapid transit and/or light rail service (referred to as "fixed transit") to existing and planned employment centers. Policies MOB-3-7 and MOB-3-8 call for a complete and connected network of sidewalks, crossings, paths, and bike lanes and a wayfinding signage system. As detailed in Section 3.13.1, "Regulatory Setting," the *Bicycle, Pedestrian, and Trails Master Plan* is currently being updated by the City. Therefore, subsequent projects covered from implementation of the Housing Element and Safety Element Update would be subject to the most recent adopted version of this document at the time of project consideration. Additionally, subsequent development projects under the Housing Element would be subject to and designed in accordance with all applicable City bicycle, pedestrian, and transit guidelines, standards, and specifications. Finally, Policy H-1-3 of the Housing Element would promote development where affordable housing in proximity to public transit or bus service.

Therefore, with implementation of the General Plan, *Bicycle, Pedestrian, and Trails Master Plan*, and Housing Element and Safety Element Update policies identified above, and all applicable City guidelines, standards, and specifications, the proposed Project would not conflict with adopted policies, plans, or programs for 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. The Project would result in a **less-than-significant** impact to transit, bicycle, and pedestrian facilities.

Mitigation Measures

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.

Impact 3.13-3: Substantially Increase Hazards Because of a Design Feature or Incompatible Uses

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.

Subsequent projects under the Housing Element and Safety Element Update, including housing site development and emergency access improvements would be subject to, and designed in accordance with City standards and specifications which address potential design hazards including sight distance, driveway placement, and signage and striping. Additionally, any new transportation facilities, or improvements to such facilities associated with subsequent projects would be constructed based on industry design standards and best practices consistent with Policy MOB-3-10, which stresses that the safety of the most vulnerable user is a priority. Therefore, there is no new significant effect and the impact is not more severe than that what was addressed in the General Plan EIR. The Project would result in a **less-than-significant** impact to transportation hazards.

Mitigation Measures

No additional mitigation is required beyond General Plan Policy MOB-3-10 and compliance with City standards and specifications.

Impact 3.13-4: Result in Inadequate Emergency Access

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.

Emergency access of subsequent projects under the Housing Element Update would be subject to review by the City of Elk Grove and responsible emergency service agencies including the City and Cosumnes Community Services District Fire Department; thus, ensuring the project would be designed to meet all emergency access and design standards. Implementation of the Safety Element Update policies could potentially result in emergency access improvements that would enhance emergency access. Therefore, adequate emergency access would be provided and there is no new significant effect. Additionally, the impact is not more severe than the impact identified in the General Plan EIR. This impact would be **less than significant**.

Mitigation Measures

No additional mitigation is required beyond compliance with City and Cosumnes Community Services District Fire Department standards.

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