

3.11 LAND USE, POPULATION, HOUSING, EMPLOYMENT, ENVIRONMENTAL JUSTICE, AND UNINCORPORATED DISADVANTAGED COMMUNITIES

The City conducted a review of comments on the Notice of Preparation (NOP) prior to preparation of this SEIR. A comment letter was received from the Sacramento Local Agency Formation Commission (LAFCo) indicating it is unclear as to whether the City intends the SEIR to serve as the environmental document for use by LAFCo, as a responsible agency, in its consideration of future annexation requests or if subsequent environmental documents would be prepared for individual development projects as they are proposed and reviewed by the City. In addition, a comment letter was submitted by the Sacramento County Farm Bureau expressing concern related to leap-frog development. The City reviewed and considered this information during preparation of this section.

3.11.1 ENVIRONMENTAL SETTING

The environmental setting for this section is essentially unchanged since the 2019 SOIA EIR was drafted. The following environmental setting provides current (2020) land use, population, housing, employment, environmental justice, and unincorporated disadvantaged communities conditions that have changed since the 2019 SOIA EIR was drafted.

EXISTING AND ADJACENT LAND USES

As identified in the 2019 SOIA EIR, most of the Project site is devoted to agriculture (i.e., row crops and pasture). The Project site also includes three existing home sites, five residences, and multiple barns and sheds.

Future Land Uses in the Vicinity of the Project Site

The City's General Plan identifies the Project site within the approximately 1,772-acre East Study Area. The East Study Area is southeast of Grant Line Road, running along the City boundary between existing five-acre developments along Equestrian Drive and the railroad tracks to the southwest. Employment uses are anticipated to function as an extension adjoining industrial development to the north and northwest, and according to the General Plan, the employment uses envisioned for the East Study Area will focus on industrial, office, and regional retail uses. In the central and northeastern portions of the East Study Area, uses will transition to residential neighborhoods that are compatible with existing neighborhoods to the north of Grant Line Road, as well as with the rural and agricultural areas located to the northeast and southeast. Opportunities for community-oriented commercial uses exist at major intersections along Grant Line Road at Bradshaw Road and Elk Grove Boulevard (City of Elk Grove 2019).

POPULATION

The City of Elk Grove's total population increased from 72,665 at its incorporation in 2000 to 176,154 in 2020, an increase of 142 percent during this 20-year period (California Department of Finance [DOF] 2020); however, this also included the annexation of Laguna West in 2004. The City estimates that Elk Grove's population will increase to 332,250 persons at buildout of its General Plan, including buildout of its study areas (City of Elk Grove 2019).

HOUSING

According to the DOF, the total number of housing units in the City of Elk Grove was 55,438 in 2020, with an average household size of 3.27 persons per unit, compared to 2.79 in unincorporated Sacramento County (DOF 2020). The larger percentage of single-family homes in Elk Grove versus countywide could be a factor in Elk Grove's larger average household size.

SACOG estimates that total number of housing units in the City of Elk Grove will be 65,660 by 2035, 66,570 by 2040, and 102,850 at buildout (SACOG 2019). This includes the estimated number of housing units that could be constructed as part of the Laguna Ridge Specific Plan, Lent Ranch Market Place, the Southeast Policy Area, Sterling Meadows, and the Triangle Special Planning Area (SACOG 2019). SACOG's future housing projections do not include development of the City's study areas (SACOG 2019). The estimated number of housing units at buildout of City's General Plan, which includes estimates of the total number of housing units that could be generated from future development of its study areas, would be 102,865 (City of Elk Grove 2019).

The 2020 MTP/SCS designates the Project site as "Lands Not Identified for Development" in the MTP/SCS planning period (SACOG 2019). Therefore, the Project site is not included in SACOG's future housing projections.

EMPLOYMENT

The largest industry sector in terms of local employment is education, health care, and social assistance, making up approximately 26 percent of the jobs in the city of Elk Grove, followed by public administration (15 percent), and the retail trade (10 percent) (U.S. Census Bureau 2018).

The average commute time for workers commuting to employment centers both inside and outside the City was approximately 33.5 minutes (U.S. Census Bureau 2018). Approximately 89 percent of those workers drove or carpooled to work in a car, truck, or van and approximately 5 percent walked, bicycled, or rode public transit (U.S. Census Bureau 2018).

Based on the current employment totals and projections, SACOG estimates that Elk Grove would have approximately 57,640 jobs by 2035, 60,070 jobs by 2040, and 122,160 at buildout (SACOG 2019). This includes the estimated number of jobs that could be generated as part of the Laguna Ridge Specific Plan, Lent Ranch Market Place, the Southeast Policy Area, and the Triangle Special Planning Area (SACOG 2019). The Project site is not included in SACOG's employment projections.

The City estimates the number of new jobs at buildout of the City's General Plan, which includes estimates of the total number of jobs that could be generated from future development of its study areas, would be 122,155 (City of Elk Grove 2019).

Unemployment

The estimated labor force in the City in 2019 was 83,100 residents, of which 80,500 were employed (EDD [California Employment Development Department] 2020a). The City's unemployment rate was 3.1 percent in 2019 (EDD 2016b). This unemployment rate is lower than Sacramento County. Sacramento County's unemployment rate in 2019 was 3.7 percent (EDD 2020a). The unemployment rate does not include individuals

16 years or over who have stopped looking for work or who are underemployed. The coronavirus pandemic has affected unemployment rates and participation rates nationwide. The latest estimate for the Elk Grove Census Designated Place is 11.5 percent from July 2020, but is identified by the Employment Development Department as being preliminary and not seasonally adjusted (EDD 2020b).

JOBS/HOUSING BALANCE

SACOG estimated that, by 2035, continued development of the Laguna Ridge Specific Plan, Lent Ranch Market Place, the Southeast Policy Area, and the Triangle Special Plan, as well as other planned development (not including the Project site, which was not anticipated in the MTP/SCS) could increase the City's jobs to 57,640 and housing units to 65,660, for a jobs-to-housing unit ratio of 0.88 by 2035. By 2040, SACOG estimated that jobs could increase to 60,070 and housing units to 66,570 for a ratio of 0.90 (SACOG 2019).

The City's policy is to designate sufficient land in employment-generating categories to provide opportunities for Elk Grove's working population and jobs in categories matching resident's employment levels (Policy LU-1-8 of the General Plan). The City General Plan estimates that buildout of the City would accommodate 48,102 new housing units and generate 77,339 new jobs, resulting in a total of 102,865 housing units and 122,155 jobs (City of Elk Grove 2018, 2019).¹ These totals include existing housing units and jobs plus new housing units and jobs generated by future development within the City limits and its study areas. Based on these data, the City estimates that buildout of the General Plan's land uses would give the City a jobs-to-housing ratio of 1.21. This ratio is essentially the same as SACOG's planned regional average of 1.2 jobs to housing ratio by 2040 (SACOG 2019).

As stated previously, the Project site is within the East Study Area. The City estimates that the East Study Area could accommodate 4,806 housing units and generate 3,875 new jobs, resulting in a jobs-to-housing ratio of 0.81 (City of Elk Grove 2019).

DISADVANTAGED UNINCORPORATED COMMUNITIES

Senate Bill (SB) 244 defines a "disadvantaged unincorporated community" as any area with 10 or more dwelling units that either is within a city sphere of influence, is an island within a city boundary, or is geographically isolated and has existed for more than 50 years, and that has a median household income of less than 80 percent of the statewide annual median. As shown in Exhibit 3.11-1, no disadvantaged unincorporated communities are contiguous with the Project site.

3.11.2 REGULATORY FRAMEWORK

ENVIRONMENTAL JUSTICE

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 provides the authority and procedures for the initiation, conduct, and completion of changes of organization and reorganization of cities and districts. The act specifies the factors that a local agency formation commission is required to consider in the review of a proposal for a change of organization or reorganization, including, among other factors, the extent to which the proposal will promote environmental justice. Environmental justice, for purposes of this law the meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to those same

¹ There is no buildout date anticipated for the General Plan (City of Elk Grove 2018). Future employment-generating land uses will be determined by market conditions (City of Elk Grove 2019).

actions, to ensure a healthy environment for all people such that the effects of pollution are not disproportionately borne by any particular populations or communities.

METROPOLITAN TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

On November 18, 2019, the Sacramento Area Council of Governments (SACOG) approved the *2020 Metropolitan Transportation Plan/Sustainable Communities Strategy* (2020 MTP/SCS), which is a regional transportation plan and land use strategy designed to build more vibrant places, accommodate changes in transportation and transportation funding, and build a safe and reliable multi-modal transportation system, including a focus on:

- ▶ Increased housing and transportation options;
- ▶ Inwardly focused growth and improved economic viability of rural areas;
- ▶ Minimized direct and indirect transportation impacts on the environment;
- ▶ A transportation system that delivers cost-effective results and is feasible to construct and maintain;
- ▶ Effective connections between people and jobs;
- ▶ Improved opportunities for businesses and citizens to easily access goods, jobs, services, and housing; and
- ▶ Real, viable choices for methods of travel.

The 2020 MTP/SCS includes a land use strategy to improve mobility and reduce travel demand from passenger vehicles by prioritizing compact and transit-oriented development, reducing the growth in vehicle miles traveled and associated greenhouse gas emissions. The 2020 MTP/SCS also includes projections for the location of growth within the region, between jurisdictions and among housing place types (i.e., infill and greenfield development). In the 2020 MTP/SCS, SACOG categorized the urbanized land within its jurisdiction into four Community Types according to land use and density/intensity: Center and Corridor Communities, Established Communities, Developing Communities, and Rural Residential Communities.

The 2020 MTP/SCS identifies the Project site as Lands Not Identified for Development (SACOG 2019). These areas of the region are not expected to develop to urban levels during the MTP/SCS planning period (in this case, through 2040). The MTP/SCS is not a land use plan – the land use assumptions are used to develop land use scenarios to examine in conjunction with different transportation investment strategies and outcomes related to transportation, air quality, and greenhouse gas emissions rates.

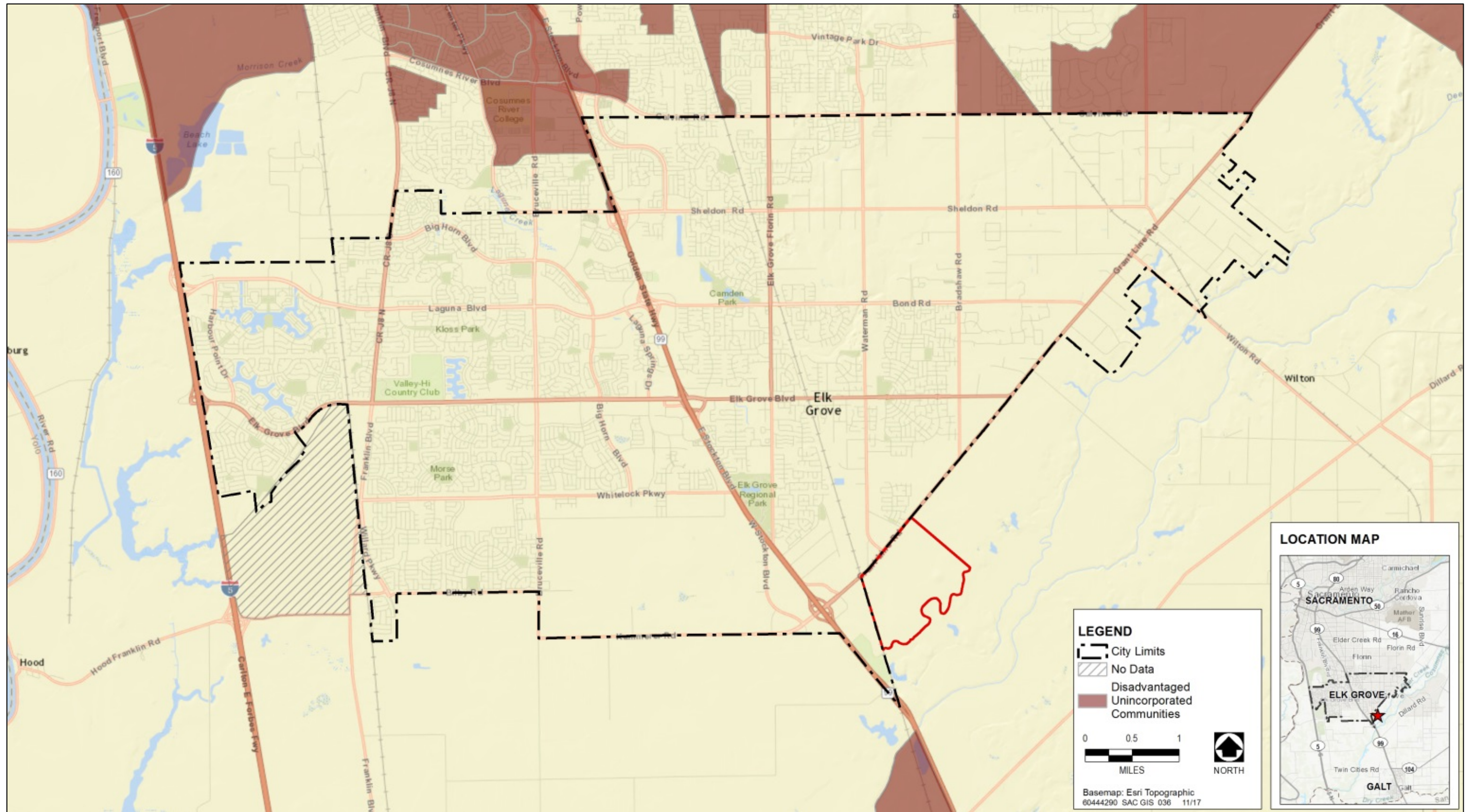
Elk Grove General Plan

The City’s General Plan (City of Elk Grove 2019), contains the following policies related to land use, population, housing, and employment that are applicable to the proposed Project.

Urban and Rural Development

Development Pattern

- ▶ **Policy LU-1-2:** Foster development patterns that will achieve a complete community in Elk Grove, particularly with respect to increasing jobs and economic development and increasing the City’s jobs-to-employed resident ratio while recognizing the importance of housing and a resident workforce.



Sources: 2010 Census, adapted by AECOM in 2016

Exhibit 3.11-1 Disadvantaged Unincorporated Communities

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Employment Land Uses

- ▶ **Policy LU-1-8:** Seek to designate sufficient land in all employment-generating categories to provide opportunities for Elk Grove’s working population and jobs in categories matching resident’s employment level.

Study Area Organizing Principles

- ▶ **Policy LU-3-1:** Ensure that future development in the Study Areas is consistent with the City’s Vision and Supporting Principles by implementing the Study Area organizing principles provided herein.

The City envisions that future development within the Study Areas will occur within a broader organizing framework of land use principles (referred to as organizing principles). Development shall occur within one or more of the following three districts.

1. Activity District, which focuses on higher densities and intensities of retail, services, employment and residential uses.
 2. Residential Neighborhood District, where residential development, with neighborhood-serving retail and parks and schools, occurs.
 3. Open Space/Conservation District, which includes large urban parks, open spaces, and agriculture-related uses.
- ▶ **Policy LU-3-2:** Employment land uses in Activity Districts should meet the following guidelines:
 - Regional Commercial and Employment Center uses should be located along major arterial roadways and generally within one-quarter mile of major intersections.
 - Community Commercial uses larger than 15 acres should be located along collector and arterial roadways, and adjacent to Mixed Use, Medium Density Residential, or High Density Residential uses.
 - Regional Commercial and Community Commercial uses should be sited within walking distance (generally one-half mile) of planned or existing transit stops.
 - Uses that may generate very high service populations (employees and/or customers) should be located within one-quarter mile of planned or existing transit stops.
 - Heavy Industrial and Light Industrial uses should be buffered from Residential uses by Public Service, Open Space, or Commercial uses.

East Study Area Development Pattern

- ▶ **Policy LU-3-13:** Ensure that the land use plans submitted for properties in the East Study Area are consistent with the Land Use Diagram (Figure 4-6) and program standards (Table 4-2).

Economy and the Region

Business Diversity

- ▶ **Policy ED-1-1:** Allow for a variety of sizes and types of commercial development in order to attract a diverse range of job opportunities and types.

Business Attraction and Expansion

- ▶ **Policy ED-1-3:** Encourage the full and efficient use of vacant and underutilized parcels in appropriately designated areas to support the development and expansion of targeted commercial uses.

Local Employment Opportunities

- ▶ **Policy ED-2-1:** Continue to improve Elk Grove's jobs/housing ratio by expanding local employment opportunities, with an emphasis on attracting jobs in sectors and industries that are well matched for the skills of the local workforce.
- ▶ **Policy ED-2-2:** Maximize the use of nonresidential land for employment-generating and revenue-generating uses.
- ▶ **Policy ED-2-3:** Support efforts to provide residents with training opportunities, in particular helping residents acquire new skills needed for employment opportunities in coordination with targeted industries.

3.11.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines, impacts resulting from the implementation of the proposed Project would be considered significant if the Project would:

- ▶ physically divide an established community;
- ▶ cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect;
- ▶ induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) or
- ▶ displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

ISSUES NOT DISCUSSED FURTHER

The following issues were dismissed from further detailed analysis in the 2019 SOIA EIR because it was determined that no impact would occur; for the reasons explained below, these issues would also result in no impact for the proposed Project as evaluated in this SEIR.

- ▶ **Physically Divide an Established Community**—The Project site is adjacent to the City of Elk Grove. A residential neighborhood consisting of single-family residences is located north of Mosher Road and northeast of the Project site, opposite Grant Line Road. The proposed Project does not include any linear features, such as new roadways, that could divide this existing community. There are no additional established communities that could be divided by future development. Therefore, this issue is not evaluated further in this document.
- ▶ **Displace Substantial Numbers of People or Existing Housing**—The Project site also includes three existing home sites and five residences. These residences are not formally or informally known as a community. Therefore, the proposed Project would not displace substantial numbers of people or existing housing that would necessitate the construction of replacement housing elsewhere and this issue is not evaluated further in this EIR.

IMPACT ANALYSIS

Impact 3.11-1: Consistency with Adopted Sacramento County and Elk Grove General Plan Policies and Land Use Designations.

Currently, the Project site is located in unincorporated Sacramento County and this area was added to the City of Elk Grove’s SOI in May of 2019. However, the City would have no direct land use authority over the area unless and until annexation to the City is approved by the Sacramento LAFCo. Because the Project site is located within the unincorporated area of Sacramento County and outside the legal City limit boundaries of Elk Grove, Sacramento County maintains the authority to designate allowable land uses and approve development on the site. Following LAFCo’s approval of the annexation, Sacramento County would relinquish land use planning authority to the City, and the Sacramento County General Plan would no longer apply to the annexed areas. As discussed in the 2019 SOIA EIR, the Project was compared to the Sacramento County General Plan to determine the consistency of the Project with existing County General Plan policies and land use designations because the City does not have the current land use control. As described in the 2019 SOIA EIR, specific impacts and Project consistency issues associated with other resource and issue areas are addressed in each technical section of this SEIR, as appropriate. These technical sections provide a detailed analysis of other relevant physical environmental effects that could result from implementation of the proposed Project (as revised for this SEIR) and identify mitigation measures, as necessary, to reduce impacts. Implementation of the revised Project would not conflict with adopted County General Plan policies, land use designations, or zoning that would generate any adverse physical impacts beyond those addressed in detail in the environmental sections of this SEIR.

Land use designations for the Project site except the Mosher property (Assessor’s Parcel Number [APN] 134-0190-002) were included in the City’s 2019 General Plan update for planning purposes. The City is now proposing a change in the General Plan land use designations and pre-zoning for the Project site compared to the array of uses assumed in the 2019 SOIA EIR for the Project site. The approximately 100-acre City-owned parcel would be designated for Light Industrial uses.² The Project site would have a reduction in the land area of Parks and Open Space, an increase in both Light Industrial and Heavy Industrial uses, a reduction in the amount of mixed General Commercial and Commercial Office uses, and a new use, Regional Commercial, proposed for 20

² The 2019 SOIA EIR included detailed analysis related to the development and operation of a multi-sport complex on the approximately 100-acre City-owned parcel. A multi-sport complex could still be developed through the City’s conditional use permit process.

acres of land (see Exhibit 2-2 and Table 2-1 in Chapter 2).³ The proposed Project is consistent with the City's policies to designate sufficient land in employment-generating categories to provide a diverse range of employment opportunities for Elk Grove's working population (City General Plan Policies LU-1-2, LU-1-8, ED-1-1, ED-2-2, and ED-1-3).

The City's General Plan identifies the Project site within the approximately 1,772-acre East Study Area. The Project's proposed land use would be consistent with the program standards for the East Study Area described in General Plan Policy LU-3-13. Project objectives would support the City General Plan's planning objectives for the East Study Area described in City General Plan Policy LU-3-2. The proposed Project would:

- ▶ Provide for development consistent with the General Plan Study Area Organizing Principles and the East Study Area Land Use District Program Standards.
- ▶ Create a mix of employment activities in the southwestern portion of the East Study Area that transitions to residential neighborhoods toward the northeast.
- ▶ Focus employment uses within the East Study Area on industrial, office, and regional retail uses.

As with County policies, consistency issues between implementation of the proposed Project and the City General Plan are related to land use regulations, which are, in part, based on avoiding or otherwise restricting uses that would adversely impact resources of the development site or adjacent land uses. Specific impacts and Project consistency issues associated with other resource topics are addressed in each technical section of this SEIR, as appropriate. These technical sections provide a detailed analysis of other relevant physical environmental effects that could result from implementation of the proposed Project and identify mitigation measures, as necessary, to reduce impacts. There are no inconsistencies between the proposed Project and the City's General Plan or other plans or policies that would result in a significant environmental impact not already addressed in this SEIR. Therefore, as with the 2019 SOIA EIR, this impact is considered **less than significant**.

Impact 3.11-2: Consistency with LAFCo Policies, Standards, and Procedures.

California Government Code Section 56668 sets forth criteria for evaluation of annexation projects. This statute establishes factors that LAFCo agencies must use in reviewing annexation proposals. Any future urban development within the Project site would require annexation by the City. This SEIR includes a discussion of relevant LAFCo policies, standards, and procedures throughout each of the topic-specific sections and a very detailed discussion in the 2019 SOIA EIR.

As noted previously, the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 provides the authority and procedures for the initiation, conduct, and completion of changes of organization and reorganization of cities and districts. The act specifies the factors that a local agency formation commission is required to consider in the review of a proposal for a change of organization or reorganization, including, among other factors, the extent to which the proposal will promote environmental justice. Environmental justice, for purposes of this law, is the meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to those same actions, to ensure a healthy environment for all people such that the effects of pollution are

³ The Project evaluated in this SEIR does not include pre-zoning of the parcels that are identified as Mixed Use (APN 134-0190-002) or Parks/Open Space (APN 134-0190-003).

not disproportionately borne by any particular populations or communities. This SEIR provides detailed analysis related to air pollutant emissions, including substantial pollutant concentrations that could impact sensitive receptors. Please see Section 3.4 for more detail. The area designated Heavy Industrial (HI) is in the southeastern portion of the Project site in order to avoid adverse effects related to future uses for sensitive receptors in the vicinity of the Project site.

As described in the City's General Plan, environmental justice is addressed in Chapter 3, Planning Framework; Chapter 4, Urban and Rural Development; Chapter 8, Services, Health, and Safety; Chapter 9 Community and Area Plans; Chapter 10, Implementation Strategy; and Chapter 12, Technical Information. Cities and counties are required to address environmental justice concerns of designated disadvantaged communities in the general plan. Disadvantaged communities are those identified as low income and that are disproportionately affected by environmental pollution, stressors, and social vulnerabilities that can lead to negative health effects, exposure, or environmental degradation. According to the City, there are no designated disadvantaged communities in the Elk Grove Planning Area, but it is nevertheless important that the City continually consider the effects of planning and land use decisions on the lives of residents and ensure that no area or population is disproportionately affected City of Elk Grove 2019, page 8-53 and 12-47).

LAFCo approved a SOIA for the Project site to add this area to the City of Elk Grove's SOI in May of 2019. The area that was included in the approved SOI amendment will not change as a result of the revised land use designations now proposed by the City. As described in detail in the 2019 SOIA EIR, the proposed Project would be consistent with LAFCo policies that were adopted to avoid or mitigate for an environmental effect. Thus, as with the 2019 SOIA EIR, this impact is considered **less than significant**.

While this SEIR addresses all matters related to policy consistency that relate to potential adverse environmental effects, policy consistency for other topics that are within the purview of LAFCo are subject to LAFCo's review and determinations.

Impact 3.11-3: Induce Substantial Unplanned Population Growth.

The City's intent for the proposed Project is to facilitate development that would create a better balance between the types of local jobs available and the skills and interests of the local labor force. The proposed Project supports the City's policies to improve Elk Grove's jobs-to-housing ratio by expanding local employment opportunities, with an emphasis on attracting jobs in sectors and industries that are well matched for the skills of the local workforce (Policies LU-1-2 and ED-2-1 of the City General Plan).

Assumed industrial and commercial land uses within the Project site could generate approximately 7,788 new jobs in the City at full buildout. In addition, future development of mixed uses on the Project site could add an assumed 713 housing units, or 2,304 residents for a total service population (population plus employment) of 10,092. As stated previously, the Project site is within the East Study Area. The City estimated as a part of the General Plan that the East Study Area could accommodate 4,806 housing units that would accommodate a population of 15,523 persons and employment-generating uses could result in 3,875 new jobs for a total service population of 19,398 (City of Elk Grove 2019). The total service population anticipated under the proposed Project (10,092) is less than the total assumed under the City's General Plan (19,398), but the employment estimate is substantially higher and the residential population substantially lower.

SACOG estimated that, by 2035, continued development of the Laguna Ridge Specific Plan, Lent Ranch Market Place, the Southeast Policy Area, and the Triangle Special Plan, as well as other planned development (not including the Project site, which was not anticipated in the MTP/SCS) could increase the City's jobs to 57,640 by 2035 and 60,070 by 2040 (SACOG 2019). Because development of the Project site is not included in SACOG's future employment projections, the jobs generated by the proposed Project (7,788 jobs) are not accounted for in SACOG's employment projections for the City. The SACOG projections are market-based growth estimates that project the amount and location of likely growth in the region based on a variety of socioeconomic factors that are updated every four years, and are defined by a horizon year.

If the proposed Project's level of job growth is realized during the City General Plan planning horizon and MTP/SCS 2040 horizon, it is possible that development of employment-generating land uses in other areas of the City or County would occur at a slower pace. The regional demographic and economic forecasts for SACOG use Board-adopted regional-level projections, which serve as control totals for the entire region (SACOG 2020). If residential or employment growth is higher for a particular jurisdiction, using the control totals, this would mean that residential or employment growth would need to be proportionally reduced in one or more areas.

As detailed in the 2019 SOIA EIR, the SEIR analyzes comprehensively the potential impacts associated with future development within the Project site, which conservatively assumes that the entire Project site could be subject to development. This includes any impacts related to the demographic and economic assumptions included in MTP/SCS for the Project site and for Elk Grove as a whole. The MTP/SCS is a regional plan intended to direct transportation planning and funding. However, it is also intended to address mobile source criteria air pollutant emissions and greenhouse gas emissions. This SEIR analyzes air pollutant and greenhouse gas emissions in a regional and statewide cumulative context, consistent with the MTP/SCS. This SEIR imposes mitigation that would, like the MTP/SCS, require future projects within the Project site to reduce mobile source air pollutant emissions and greenhouse gas emissions, finding significant impacts for these topics (see Section 3.4, "Air Quality," Section 3.8, "Greenhouse Gas Emissions," and Chapter 6, "Other CEQA Considerations," of this SEIR).

Physical impacts associated with development of the Project site, such as traffic, greenhouse gas emission, air quality degradation, and noise generation and impacts related to increased demand for public services and utilities, are evaluated throughout this SEIR because the Proposed project's future land uses are considered to be part of buildout of the Project site. Mitigation presented throughout this SEIR addresses environmental impacts associated with future development of the Project site. There is no significant impact that is not addressed comprehensively throughout this SEIR. Therefore, as with the 2019 SOIA EIR, this impact is considered **less than significant**.

Impact 3.11-4: Conversion of Open Space.

Future development within the SOIA Area, including the multi-sport park complex project, may lead to the conversion of open space resources, as defined by Sacramento LAFCo, to urban uses.

LAFCo includes unimproved lands devoted to agricultural lands within its definition of open space. It is assumed that the Project would result in urbanization of the Project site. Therefore, the Project may indirectly create pressure to submit additional applications for annexation. In addition, the development of the multi-sport park complex would be urbanization of open space. The potential adverse physical environmental effects associated

with this conversion of open space are addressed completely in the balance of this SEIR. This impact is considered **significant**.

Mitigation Measures

Mitigation Measure 3.11-4: Implement Mitigation Measure 3.3-1 (Preserve Agricultural Land).

Significance after Mitigation

While conservation easements placed elsewhere in the region could partially offset the direct conversion of open space attributable to future development that could occur within the Project site, this approach would not create new farmland to replace open space that could be lost. This impact is **significant and unavoidable**.

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