



FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

City of Elk Grove Housing Element and Safety Element Update

State Clearinghouse No. 2020069032

Prepared for:



April 2021

FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

City of Elk Grove Housing Element and Safety Element Update

State Clearinghouse No. 2020069032

Prepared for:



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

Contact:

Christopher Jordan
Director of Strategic Planning and Innovation

Prepared by:



Ascent Environmental
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Contact:

Cori Resha
Project Manager

April 2021

TABLE OF CONTENTS

Section	Page
LIST OF ABBREVIATIONS	ii
1 INTRODUCTION	1-1
1.1 Purpose and Intended Uses of this Final EIR	1-1
1.2 Project Location.....	1-1
1.3 Project Objectives	1-2
1.4 Summary Description of the Project.....	1-2
1.5 Major Conclusions of the Environmental Analysis.....	1-2
1.6 CEQA Public Review Process	1-3
1.7 Organization of the Final SEIR	1-3
2 RESPONSES TO COMMENTS.....	2-1
2.1 List of Commenters on the Draft SEIR.....	2-1
2.2 Comments and Responses.....	2-1
3 REVISIONS TO THE DRAFT EIR.....	3-1
4 REFERENCES.....	4-1
5 LIST OF PREPARERS.....	5-1
 Tables	
Table 2-1 List of Commenters	2-1

LIST OF ABBREVIATIONS

CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Elk Grove
Draft SEIR	draft subsequent environmental impact report
EGWD	Elk Grove Water District
Final SEIR	final subsequent environmental impact report
HCD	Housing and Community Development
I-5	Interstate 5
NOA	notice of availability
OHWD	Omochumne-Hartnell Water District
Project	Housing Element and Safety Element Update Project
Regional San	Sacramento Regional County Sanitation District
SASD	Sacramento Area Sewer District
SCWA	Sacramento County Water Agency
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SR 99	State Route 99

1 INTRODUCTION

This final subsequent environmental impact report (Final SEIR) has been prepared by the City of Elk Grove (City), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (CCR Section 15132). This Final SEIR contains responses to comments received on the draft subsequent environmental impact report (Draft SEIR) for the Housing Element and Safety Element Update Project (Project). The Final SEIR consists of the Draft SEIR and this document (response to comments document), which includes comments on the Draft SEIR, responses to those comments, and revisions to the Draft SEIR.

1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the Project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final SEIR has been prepared to respond to comments received on the Draft SEIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft SEIR, including Project updates, made in response to these comments and as a result of the City's ongoing planning efforts. The Final SEIR will be used to support the City's decision regarding whether to approve the Housing Element and Safety Element Update Project.

This Final SEIR will also be used by CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit Project elements over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the Project or that have jurisdiction over portions of the Project.

Because the proposed Project includes an update to the Housing Element, the updated Housing Element will be submitted to the State Department of Housing and Community Development (HCD) for certification. The update to the Safety Element is required to be submitted to California Geological Survey of the Department of Conservation and the Central Valley Flood Protection Board for review, but these agencies are advisory and do not certify the updates. Other than HCD's certification authority, there are no agencies other than the City that have approval or permitting authority for the Project. However, implementation of the proposed Housing Element (i.e., approval of future projects) could involve many responsible agencies, depending on the details of a future project. The following are some of the agencies that could be required to act as responsible agencies for subsequent projects under the Housing Element and Safety Element Update.

- ▶ California Department of Fish and Wildlife (CDFW)
- ▶ Elk Grove Water District (EGWD)
- ▶ Omochumne-Hartnell Water District (OHWD)
- ▶ Sacramento Area Sewer District (SASD)
- ▶ Sacramento County Water Agency (SCWA)
- ▶ Sacramento Metropolitan Air Quality Management District (SMAQMD)
- ▶ Sacramento Municipal Utility District (SMUD)

1.2 PROJECT LOCATION

The City is located in Sacramento County and consists of approximately 42 square miles within its boundary. 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).

1.3 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.

1.4 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.

1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft SEIR identified the following significant and unavoidable impacts related to the Project:

- ▶ 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

1.6 CEQA PUBLIC REVIEW PROCESS

On February 12, 2021, the City released the Draft SEIR for a 45-day public review and comment period. The Draft SEIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on the City's website (<http://www.elkgrovecity.org/housingelement>); and was made available at the City's offices at 8401 Laguna Palms Way and the Elk Grove Library at 8900 Elk Grove Boulevard. A notice of availability (NOA) of the Draft SEIR was published in the Sacramento Bee and distributed by the City to a project-specific mailing list.

A public meeting was held at noon on March 17, 2021, to receive input from agencies and the public on the Draft SEIR. Consistent with Executive Order N-29-20 issued on March 17, 2020, and Executive Order N-35-20 issued on March 21, 2020, by the Governor of the State of California, this meeting was held online only via Zoom. The meeting was recorded and no comments were received.

As a result of these notification efforts, written comments were received from four agencies and one organization on the content of the Draft SEIR. Chapter 2, "Responses to Comments," identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (State CEQA Guidelines Section 15088.5).

1.7 ORGANIZATION OF THE FINAL SEIR

This Final SEIR is organized as follows:

Chapter 1, "Introduction," describes the purpose of the Final SEIR, summarizes the Housing Element and Safety Element Update Project and the major conclusions of the Draft SEIR, provides an overview of the CEQA public review process, and describes the content of the Final SEIR.

Chapter 2, "Responses to Comments," contains a list of all parties who submitted comments on the Draft SEIR during the public review period, copies of the comment letters received, and responses to the comments.

Chapter 3, "Revisions to the Draft EIR," presents revisions to the Draft SEIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by ~~strikeouts~~ where text is removed and by underline where text is added.

Chapter 4, "References," identifies the documents used as sources for the analysis.

Chapter 5, "List of Preparers," identifies the lead agency contacts as well as the preparers of this Final SEIR.

This page intentionally left blank.

2 RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft SEIR, which concluded on March 29, 2021. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft SEIR.

2.1 LIST OF COMMENTERS ON THE DRAFT SEIR

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

Table 2-1 List of Commenters

Letter No.	Commenter	Date
AGENCIES		
A1	California Department of Transportation (Caltrans) Doug Adams, Associate Transportation Planner	February 16, 2021
A2	Sacramento Regional County Sanitation District (Regional San) Robb Armstrong, Principal Engineering Technician	February 17, 2021
A3	Sacramento Municipal Utility District (SMUD) Amy Spitzer, Environmental Services Specialist	March 23, 2021
A4	Sacramento Metropolitan Air Quality Management District (SMAQMD) Joseph J. Hurley, Associate Air Quality Planner/Analyst	March 29, 2021
ORGANIZATIONS		
O1	The Pacific Companies, Mike Kelley	March 1, 2021

2.2 COMMENTS AND RESPONSES

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

2.2.1 Agencies

**Letter
A1**

From: [Christopher Jordan](#)
To: [Cori Resha](#)
Cc: [Pat Angell](#)
Subject: FW: Caltrans No Comment: Public Draft Housing Element Available for Review
Date: Tuesday, February 16, 2021 1:43:32 PM
Attachments: [image003.png](#)
[image004.png](#)

FYI

From: Adams, Douglas@DOT <Douglas.Adams@dot.ca.gov>
Sent: Tuesday, February 16, 2021 1:40 PM
To: Christopher Jordan <cjordan@elkgrovecity.org>
Subject: Caltrans No Comment: Public Draft Housing Element Available for Review

[EXTERNAL EMAIL]

Hello Christopher,

I wanted to let you know that Caltrans will have no comment on the Public Draft of the Housing Element.

A1-1

Thank you,

Doug Adams
 Associate Transportation Planner
 Planning, Local Assistance, and Sustainability
 California Department of Transportation, District 3
 703 B Street | Marysville CA 95901
 Phone: (530) 741-4543
 Email: douglas.adams@dot.ca.gov
www.dot.ca.gov/d3/

For real-time highway conditions: <http://quickmap.dot.ca.gov/>



From: City of Elk Grove <strategicplanning@elkgrovecity.org>
Sent: Friday, February 12, 2021 9:31 AM
To: Fong, Alexander Y@DOT <alexander.fong@dot.ca.gov>
Subject: Public Draft Housing Element Available for Review

EXTERNAL EMAIL. Links/attachments may not be safe.

Letter A1 California Department of Transportation (Caltrans)

Doug Adams, Associate Transportation Planner

February 16, 2021

A1-1

The comment states that Caltrans has no comment on the Draft SEIR.

This comment is noted.

From: [Christopher Jordan](#)
To: [Cori Resha](#)
Cc: [Pat Angell](#)
Subject: FW: Elk Grove Housing Element and Safety Element Update_DSEIR_Notice of Availability
Date: Wednesday, February 17, 2021 1:30:34 PM
Attachments: [City of Elk Grove Housing Element and Safety Element Update_NOA_DSEIR_Final_20210217.pdf](#)

Letter
A2

FYI

From: Armstrong, Robert <armstrongro@sacsewer.com>
Sent: Wednesday, February 17, 2021 1:18 PM
To: Christopher Jordan <cjordan@elkgrovecity.org>
Cc: Sandy Kyles <skyles@elkgrovecity.org>
Subject: Elk Grove Housing Element and Safety Element Update_DSEIR_Notice of Availability

[EXTERNAL EMAIL]

Good Afternoon Christopher,

Please find the attached response letter from Regional San pertaining to the above-mentioned project.

Feel free to contact me with any additional questions or concerns.

-Robb

A2-1

Robb Armstrong
Principal Engineering Technician

Regional San – Development Services & Plan Check
 10060 Goethe Road
 Sacramento, CA 95827
 Phone: (916) 876-6104
 Email: armstrongro@sacsewer.com
www.regionalsan.com



Please consider the environment before printing this email.

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission. Certain information that you provide us is subject to disclosure under the California Public Records Act or other legal requirements. This means that if it is specifically requested by a member of the public, we are required to provide the information to the person requesting it. We may share personally identifying information with other City of Elk Grove departments or agencies in order to respond to your request. In some circumstances we also may be required by law to disclose information in accordance with the California Public Records Act or other legal requirements.



Main Office

10060 Goethe Road
 Sacramento, CA 95827-3553
 Tel: 916.876.6000
 Fax: 916.876.6160

Treatment Plant

8521 Laguna Station Road
 Elk Grove, CA 95758-9550
 Tel: 916.875.9000
 Fax: 916.875.9068

Board of Directors

Representing:

- County of Sacramento
- County of Yolo
- City of Citrus Heights
- City of Elk Grove
- City of Folsom
- City of Rancho Cordova
- City of Sacramento
- City of West Sacramento

Prabhakar Somavarapu
District Engineer

Ruben Robles
Director of Operations

Christoph Dobson
Director of Policy & Planning

Matthew Doyle
Director of Internal Services

Joseph Maestretti
Chief Financial Officer

Nicole Coleman
Public Affairs Manager

www.regionalsan.com

Printed on Recycled Paper

February 17, 2021

Mr. Christopher Jordan
 City of Elk Grove – Development Services Department
 8401 Laguna Palms Way
 Elk Grove, CA 95758

Subject: Notice of Availability of a Draft Supplemental Environmental Impact Report for the City of Elk Grove Housing Element and Safety Element Update

Dear Mr. Jordan,

Sacramento Regional County Sanitation District (Regional San) has the following comments pertaining to the Notice of Availability of the Draft Supplemental Environmental Impact Report for the City of Elk Grove’s (City) Housing Element and Safety Element Update.

The Housing Element Update addresses any changes that have occurred since adoption of the City’s current (2013-2021) Housing Element as well as amending the City’s General Plan land use designations and rezone sites within the City to accommodate the changes specified in the Housing Element Update.

Local sanitary sewer service for the proposed project will be provided by the Sacramento Area Sewer District’s (SASD) local sewer collection system. Ultimate conveyance of wastewater from the SASD collection system to the Sacramento Regional Wastewater Treatment Plant (SRWTP) for treatment and disposal will be provided by the Regional San Interceptor system.

A2-2

Customers receiving service from Regional San and SASD are responsible for rates and fees outlined within the latest Regional San and SASD ordinances. Fees for connecting to the sewer system are set up to recover the capital investment of sewer treatment facilities that provides service to new customers. The SASD ordinance is located on the SASD website at <https://www.sacsewer.com/sewer-ordinance> and the Regional San ordinance is located on the Regional San website at <https://www.regionalsan.com/ordinance>.

In February 2013, the Regional San Board of Directors adopted the Interceptor Sequencing Study (ISS). The ISS updated the Regional San Master Plan 2000. The ISS is located on the Regional San website at www.regionalsan.com/ISS.

A2-3

In January 2012, the SASD Board of Directors approved the most current SASD planning document, the 2010 System Capacity Plan Update (SCP). The SCP is located on the SASD website at www.sacsewer.com/devres-standards.html.

Mr. Christopher Jordan
February 17, 2021
Page 2

Regional San and SASD are not land-use authorities. Projects identified within Regional San and SASD planning documents are based on growth projections provided by land-use authorities. Sewer studies may need to be completed to assess the impacts of any proposed project that has the potential to increase flow demands.

A2-4

If you have any questions regarding this letter, please feel free to contact me at (916) 876-6104 or by email: armstrongro@sacsewer.com.

Sincerely,

Robb Armstrong

Robb Armstrong
Regional San Development Services & Plan Check

cc: SASD Development Services

Letter A2 Sacramento Regional County Sanitation District (Regional San)

Robb Armstrong, Principal Engineering Technician

February 17, 2021

- A2-1 The comment states that comments from the Sacramento Regional County Sanitation District (Regional San) are attached.
- This comment is noted. Response to these comments are provided in Responses to Comments A2-2 through A2-4.
- A2-2 The comment summarizes the Project and outlines the requirements for new connections.
- This comment is noted. Draft SEIR page 3.14-3 describes the Region San Master Plan (also referred to as the SRWTP Master Plan) and the Regional Interceptor Master Plan.
- A2-3 The comment discusses relevant documents, including the Regional San Master Plan 2000 and the 2010 System Capacity Plan Update.
- The reader is referred to Response to Comment A2-2.
- A2-4 The comment states that sewer studies may need to be completed to assess the impacts of any proposed project that has the potential to increase flow.
- An analysis of potential increases in wastewater flows from implementation of the Project are addressed in Draft SEIR Impact 3.14-2 on Draft SEIR page 3.14-20. As the City receives applications for housing development, project details will be sent to Regional San for review.

Powering forward. Together

Letter
A3



Sent Via E-Mail

March 23, 2021

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

Subject: **2021-2029 Housing Element and Safety Element Update /
EIR / 2020069032**

Dear Mr. Jordan:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Environmental Impact Report (EIR) for the 2021-2029 Housing Element and Safety Element Update Project (Project, SCH 2020069032). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

A3-1

We have no comments to offer at this time but would appreciate if the City of Elk Grove would continue to keep SMUD facilities in mind as environmental review of the Project moves forward. Please reroute the Project analysis for SMUD's review if there are any changes to the scope of the Project.

If you have any questions regarding this letter, please do not hesitate to contact me at 916.732.5384, or by email at Amy.Spitzer@smud.org.

Sincerely,

Amy Spitzer
Environmental Services Specialist
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817

cc: Entitlements

Letter A3 Sacramento Municipal Utility District (SMUD)

Amy Spitzer, Environmental Services Specialist
March 23, 2021

A3-1

The comment states that SMUD has no comments to offer at this time but requests that the City send project-specific details for review when development projects are proposed pursuant to the Project.

The comment is noted. As the City receives applications for housing development, project details will be sent to SMUD for review.

Letter
A4



March 29, 2021

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

**Subject: Draft Subsequent Environmental Impact Report for the City of Elk Grove
 Housing Element and Safety Element-State Clearinghouse No. 2020069032**

Dear Mr. Jordan:

Thank you for providing an opportunity for the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) to review the Draft Subsequent Environmental Impact Report (DSEIR) for the City of Elk Grove 2021 Housing Element Update (HEU). As described in the SDEIR, the purpose of the 2021 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. Sac Metro Air District staff (District staff) comments on the HEU and SDEIR follow.

A4-1

1. Locating Sensitive Receptors Near Sources of Air Toxics:

District staff notes the implementation of 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 would lower exposure of sensitive receptors to sources of toxic air contaminants (TACs) throughout the General Plan Planning Area. District staff commends the City for the inclusion of these measures.

A4-2

Additionally, District staff recommends the HEU include requirements to provide vegetative barriers between new housing and major roadways to reduce TAC exposure. More information and best practices are described in the Sac Metro Air District's *Landscaping Guidance for Improving Air Quality near Roadways*¹ for installing vegetative barriers between major roadways and sensitive receptors.

2. Energy Conservation:

District staff notes the discussion of opportunities for Energy Conservation in Chapter 9. In addition to the policies listed in the Elk Grove Climate Action Plan and General Plan, District staff recommends expanding this section to encourage electrification of HVAC, water heating, and kitchen equipment, which can conserve energy, reduce greenhouse gas (GHG) emissions, and improve indoor air quality.²

A4-3

¹ [Landscaping Guidance for Improving Air Quality near Roadways](#), Sacramento Metropolitan Air Quality Management District, April 2017

² Gas Stoves: Health and Air Quality Impacts and Solutions; Brady Seals & Andee Krasner, Rocky Mountain Institute, 2020 <https://rmi.org/insight/gas-stoves-pollution-health/>

Along with the City of Elk Grove, the Sac Metro Air District participated in the Capital Region Transportation Sector Urban Heat Island Mitigation Project (UHI Project)³, producing a report on urban heat island effect impacts on the Sacramento region, and mitigation strategies for these impacts. The urban heat island already presents a serious challenge for our region. Urbanized areas are 3 to 9 degrees Fahrenheit warmer than surrounding areas, which results in decreased air quality and associated public health impacts along with increased energy usage. Chapter 9 could also include policies to reduce the urban heat island effects in Elk Grove and the region by encouraging cool roofs⁴ and high albedo pavements⁵, which would further reduce the energy needed to heat and cool homes.

A4-4

3. Transit-Oriented Development:

The HEU DSEIR references General Plan policies that are supportive of transit-oriented development, which is critical to reducing vehicle miles traveled and meeting climate change and air quality goals. As described in Section 3.13 Transportation, on page 3.13-5; policies MOB-4-4, MOB-5-1, MOB-5-4, and MOB-5-6 will support and encourage transit-oriented development⁶.

A4-5

Thank you for your consideration of these comments. If you have any questions, please contact me at 916-874-2694 or jhurley@airquality.org.

Regards,

-JJ Hurley

Joseph J. Hurley
Associate Air Quality Planner/Analyst

cc: Paul Phillely, AICP, CEQA & Land Use Program Supervisor

³ Capital Region Urban Heat Island Mitigation Project website: <https://urbanheat-smaqmd.hub.arcgis.com/>

⁴ [The California Energy Commission's Title 24, Part 6](#), suggests an aged solar reflectance of at least 0.63 for low-sloped roofs and at least 0.20 for steep-sloped roofs, and minimum thermal emittance of 0.75. The Cool Roof Rating Council provides [a product directory of roofs](#).

⁵ <http://www.airquality.org/LandUseTransportation/Documents/SMAQMDRecommendedCoolPavementStrategies.pdf>

⁶ HUE DSEIR Section 3.13 Transportation; page 3.13-5;

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).

Letter A4 Sacramento Metropolitan Air Quality Management District (SMAQMD)

Joseph J. Hurley, Associate Air Quality Planner/Analyst

March 29, 2021

- A4-1 The comment is an introductory remark summarizing the Project.
The comment is noted.
- A4-2 The comment states that implementation of General Plan Policies would lower exposure of sensitive receptors to sources of toxic air contaminants (TACs) and recommends that the Housing Element Update include requirements to provide vegetative barriers between new housing and major roadways to reduce TAC exposure.

As identified under Draft SEIR Impact 3.2-4, implementation of the Project would not result in a new TAC impact or a substantially more severe TAC impact than was addressed in the General Plan EIR (Draft SEIR pages 3.2-21 and 3.2-22). Implementation of General Plan policies NR-4-9, NR-4-10, and Standard NR-4-10a on applicable subsequent projects would include the consideration of buffering to address pollutant exposure and would include consideration of vegetative barriers as identified in the Sacramento Metropolitan Air Quality Management District's *Landscaping Guidance for Improving Air Quality near Roadways*.
- A4-3 The comment notes the discussion of opportunities for Energy Conservation in Chapter 9 and recommends expanding this section to encourage electrification of HVAC, water heating, and kitchen equipment, which can conserve energy, reduce greenhouse gas (GHG) emissions, and improve indoor air quality.

The comment is noted. The Project consists of the update of the General Plan Housing Element and Safety Element and does not propose updates to the City's Climate Action Plan. As identified in Draft SEIR Impacts 3.5-1, 3.5-2, and 3.7-1, implementation of the Project would not result in new energy or greenhouse impacts or substantially more severe impacts than was addressed in the General Plan EIR (Draft SEIR pages 3.5-8 through 3.5-11 and 3.7-10 through 3.7-11).
- A4-4 The comment discusses participation in the Capital Region Transportation Sector Urban Heat Island Mitigation Project (UHI Project) and states that Chapter 9 could also include policies to reduce the urban heat island effects in Elk Grove and the region by encouraging cool roofs and high albedo pavements, which would further reduce the energy needed to heat and cool homes.

The comment is noted and will be forwarded to the Planning Commission and City Council for consideration. No comments on the adequacy of the Draft SEIR were provided so no further response is provided.
- A4-5 The comment notes that General Plan Policies described in Section 3.13 will support and encourage transit-oriented development.

The comment is noted and will be forwarded to the Planning Commission and City Council for consideration.

2.2.2 Organizations

From: [Christopher Jordan](#)
To: [Cori Resha](#); [Pat Angell](#)
Subject: FW: Laguna Bruceville Property
Date: Monday, March 1, 2021 2:59:29 PM

Letter
01

FYI... for site C-3.

From: Mike Kelley <mikek@tpchousing.com>
Sent: Monday, March 1, 2021 2:56 PM
To: Christopher Jordan <cjordan@elkgrovecity.org>; Sarah Kirchgessner <skirchgessner@elkgrovecity.org>
Subject: RE: Laguna Bruceville Property

[EXTERNAL EMAIL]

Hi Christopher,

Just a note to let you know RD 40 (min 30.1 du/acre – 40 du/acre) works for the program we are pursuing. We are much more familiar with the site today than when we last communicated.

Please let me know if you have questions or require any additional information.

Best regards,
Mike

01-1

Letter O1 The Pacific Companies

Mike Kelley

March 1, 2021

O1-1 The comment requests that housing site C-3 be changed to reflect RD-40 zoning.

Based on this comment, the City proposes the text changes shown below to reflect proposed RD-40 zoning on site C-3. While this zoning change would increase the potential number of net new dwelling units beyond what was evaluated in the General Plan EIR, this would not change the overall development footprint anticipated in the General Plan EIR. Thus, the additional units would not change the analyses or conclusions for impacts based on the development footprint. The air quality, greenhouse gas (GHG) emissions, energy, and noise impact analysis and modeling used the RHNA allocation for the very low, low, and moderate income levels (5,451 units) rather than net new units (i.e., beyond what was considered in the General Plan EIR) presented in the Draft SEIR (2,722 units). Because those analyses assumed up to 5,451 new residential units, the addition of 23 additional units to the net new number of units beyond what was evaluated in the General Plan EIR would still be lower than the amount assumed by these analyses. Therefore, the addition of units in response to this comment would not change the information presented in those analyses or their conclusions. For vehicle miles traveled (VMT) analysis, the increase of additional units within a site already evaluated would have the potential to decrease overall VMT by increasing the housing density. For other issues related to public services and utilities that are based on unit count or number of residents, text changes below reflect the slight increases. This information does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

Text deletions are shown in ~~striketrough~~, and text additions are shown in underline. The following edits are made to the Draft SEIR. These edits are minor and do not constitute "significant new information" that would require recirculation of the Draft EIR under State CEQA Guidelines Section 15088.5.

Table 2-2 beginning on page 2-14 is revised as follows:

Table 2-2 Existing Sites and Candidate Sites for Very Low and Low Income Groups

Map ID	General Location	Acreage	Existing General Plan Designation	Existing Zoning	Proposed General Plan Designation	Proposed Rezoning	Dwelling Units
E-1	M&H Site in Lent Ranch	12.8	HDR	RD-20	HDR	RD-20	230
E-2	Quail Run	4.88	HDR	RD-25	HDR	RD-25	102
E-3	Southeast corner of Bruceville Road and Poppy Ridge Road	15.48	HDR	RD-20	HDR	RD-30	418
E-4	Northwest corner of Bruceville Road and Big Horn Boulevard	6.5	HDR	RD-25	HDR	RD-30	178
E-5	SEPA, Clark Property, Poppy Ridge at Lotz Parkway	9	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (25-30)	243
E-6	SEPA, Suyanaga Property, Southeast corner of Poppy Ridge and Big Horn	8.6	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (25-30)	233

Map ID	General Location	Acreage	Existing General Plan Designation	Existing Zoning	Proposed General Plan Designation	Proposed Rezoning	Dwelling Units
E-7	SEPA, Souza Lot 1096	7.1	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	192
E-8	SEPA, Souza Lot 1097	7.9	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	198
E-9	SEPA, Souza Lot 1098	6.5	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	163
E-10	SEPA, Souza Lot 1098	7.2	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	180
E-11	SEPA, Souza Lot 1105	9.3	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	233
E-12	SEPA, Bruceville Meadows	8.4	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (25-30)	227
E-13	Laguna Ridge, Backer Property, Southwest corner of Big Horn and Poppy Ridge	11.1	HDR	RD-25	HDR	RD-25 <u>RD-30</u>	300
E-14	Elk Grove Florin Road at Brown Road	4.4	HDR	RD-25	HDR	RD-30	119
E-15	Harbour Point Drive and Maritime Drive	3.06	HDR	RD-25	HDR	RD-30	83
E-16	East Stockton Boulevard at Bow Street	2.9	HDR	RD-25	HDR	RD-30	78
E-17	Sheldon Farms North, Stein	5.3	HDR	RD-25	HDR	RD-30	143
E-18	Sheldon Farms South, Arsone	9	HDR	RD-25	HDR	RD-25 <u>RD-30</u>	243
C-1	Sterling Meadows HDR Site (southeast corner of Lotz Parkway and Bilby Road)	10.68	HDR	RD-20	HDR	RD-30	289
C-2	End of Dunisch Road	2.87	RC	SC	HDR	RD-25	72
C-3	Laguna Boulevard and Bruceville Road (COBRA/Pacific Properties)	7.6	MDR	RD-15	HDR	RD-30 <u>RD-40</u>	205 <u>228</u>
C-4	2804 Elk Grove Boulevard (Samos)	7.49	MDR	RD-15	HDR	RD-30	202
C-5	Southeast corner Sheldon Road and East Stockton Boulevard	12.3	RC	SC	HDR	RD-30	332
C-6	Northeast corner Sheldon Road and Power Inn Road	8	CC	GC	HDR	RD-30	216
C-7	Waterman Road at Rancho Drive	3.5	LDR	RD-4	HDR	RD-25	88

Map ID	General Location	Acreage	Existing General Plan Designation	Existing Zoning	Proposed General Plan Designation	Proposed Rezoning	Dwelling Units
C-8	8994 Calvine Road	2.32	RC	RD-5	HDR	RD-25	58
C-9	8770 Calvine Road	3.5	HDR	RD-20	HDR	RD-25	88
C-10	Laguna Boulevard and Hausmann Street	6.96	CC	LC	HDR	RD-30	198
C-11	Laguna Vaux	2.59	CC	LC	HDR	RD-30	70
C-12	Laguna Boulevard and Gropius Street	5.85	EC	MP	HDR	RD-30	158
C-13	9296 E Stockton Boulevard	3.81	HDR	RD-20	HDR	RD-30	103
C-14	9343 E Stockton Boulevard	1.96	EC	BP	HDR	RD-30	53
C-15	Northwest corner Bond Road and Waterman Road	4.6	CC	GC	HDR	RD-25	115
C-16	Stathos Property (Elk Grove Blvd, west of Carlton assisted care facility)	3.19	LDR	RD-5	HDR	RD-30	86
C-17	Waterman 75 (Mosher Road and Grant Line Road)	5	RC	RD-10	HDR	RD-30	135
C-18	Bow Street Northwest	10.3	LDR	RD-6	HDR	RD-30	258
C-19	Old Town, southwest corner of Elk Grove Boulevard and Webb Street	1.87	CC	OTSPA	HDR	RD-25	53
C-20	Southeast corner Bond Road and Waterman Road	1.5	RR	AR-2	HDR	RD-25	38
C-21	Bond Road and Stonebrook Drive	1.66	MDR	RD-15	HDR	RD-25	42
C-22	Calvine Road and Jordan Ranch Road	2.06	ER	RD-4	HDR	RD-25	52
C-23	Calvine Road and Bradshaw Road	2.02	CC	GC/AR-5	HDR	RD-25	21
C-24	Southwest corner Lotz Parkway and Whitelock Parkway	5	LDR	RD-5	HDR	RD-25	125
C-25	Bradshaw, just south of Calvine, behind/adjoining Eden Gardens Event Center	5.17	ER	AR-5	HDR	RD-25	129
Total		261.5 acres					6,749 <u>6,772</u>

The paragraph beginning at the bottom of page 2-14 is revised as follows:

As shown in Table 2-2, the proposed Housing Element Update would accommodate up to ~~6,749~~ 6,772 units for the RHNA very low and low income groups, which exceeds the City's requirement of providing 4,265 units for these income groups.

The first paragraph on page 2-15 of the Draft SEIR is revised as follows:

Table 2-3 below identifies the potential number of units under the adopted General Plan and the maximum number of units under the proposed Housing Element Update. As shown in Table 2-3, the adopted General Plan and current zoning anticipates 4,027 units on the existing and candidate housing sites. Under the proposed Housing Element Update, up to an additional ~~2,722~~ 2,745 units would be provided based upon the assumed average density. The proposed rezoning of candidate housing sites C-2, C-5, C-6, C-10, C-11, C-12, C-14, C-15, C-17, C-19, and C-23 would result in the loss of planned nonresidential uses and approximately 1,419 jobs under buildout of the General Plan.

Table 2-3 beginning on page 2-15 is revised as follows:

Table 2-3 Existing and Proposed Development Potential under the General Plan

Map ID	Potential Dwelling Units Adopted General Plan Land Use Designations	Potential Dwelling Units Housing Element Update	Development Potential Change From Adopted General Plan
E-1	230	230	0
E-2	102	102	0
E-3	310	418	108
E-4	163	178	15
E-5	225	243	18
E-6	215	233	18
E-7	178	192	14
E-8	198	198	0
E-9	163	163	0
E-10	180	180	0
E-11	233	233	0
E-12	210	227	17
E-13	300	300	0
E-14	110	119	9
E-15	77	83	6
E-16	73	78	5
E-17	133	143	10
E-18	225	243	18
C-1	192	289	97
C-2	0	72	72
C-3	91	205 <u>228</u>	114 <u>137</u>
C-4	90	202	112
C-5	0	332	332
C-6	0	216	216
C-7	14	88	74

Map ID	Potential Dwelling Units Adopted General Plan Land Use Designations	Potential Dwelling Units Housing Element Update	Development Potential Change From Adopted General Plan
C-8	12	58	46
C-9	63	88	25
C-10	0	198	198
C-11	0	70	70
C-12	0	158	158
C-13	67	103	36
C-14	0	53	53
C-15	0	115	115
C-16	16	86	70
C-17	40	135	95
C-18	62	258	196
C-19	0	53	53
C-20	1	38	37
C-21	20	42	22
C-22	8	52	44
C-23	0	21	21
C-24	25	125	100
C-25	1	129	128
Total	4,027	6,749 <u>6,772</u>	2,722 <u>2,745</u>

The first paragraph on page 3.5-9 is revised as follows:

For instance, parcels C-1, Sterling Meadows High-Density Residential Site, C-3, Laguna Boulevard and Bruceville Road, and C-4, 2804 Elk Grove Boulevard (among several others) are proposed to be rezoned to RD-30 or RD-40 to provided additional higher-density, affordable housing to meet the City’s housing needs (see Table 2-2 in Chapter 2, “Project Description.”

The paragraph under Impact 3.8-2 on page 3.8-12 is revised as follows:

General Plan EIR Impact 5.8.3 evaluated the potential for hazardous emissions within one-quarter mile of existing or proposed schools. The analysis noted that there are several elementary schools, middle schools, and high schools as well as several private schools, preschools, and childcare facilities within the City. The analysis concluded that while the General Plan could result in activities that would involve the use of hazardous materials within one-quarter mile of a school, adherence to existing regulations and General Plan policies would ensure that impacts would be less than significant. Eighteen potential housing sites (Sites C-3, C-4, C-5, C-6, C-8, C-9, C-10, C-13, C-14, C-16, C-21, C-22, C-23, C-25, E-2, E-4, E-15, and E-18) are located within one-quarter mile of an existing or proposed school. Implementation of the Project could result in a net increase in the number of residential units in the City over what is planned for under the General Plan by up to ~~2,722~~ 2,745 net new residential units depending on the final selection of housing sites for the Housing Element Update. Residential land uses do not typically involve the storage or usage of substantial quantities of hazardous materials, and thus, Project implementation would not result in a substantial increase of hazardous materials located near schools.

Impact 3.10-1 on page 3.10-14 is revised as follows:

Impact 3.10-1: Induce Substantial Population Growth

The Housing Element Update would accommodate up to ~~2,722~~ 2,745 net new dwelling units, which would accommodate approximately ~~8,765~~ 8,839 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.

Table 2-2 and Figure 2-2 in Chapter 2, "Project Description," indicate the location and size of existing and candidate sites. While no specific development projects are proposed at this time, subsequent multi-family development on any or all of the existing and candidate sites would be not considered additional population or housing growth above that projected in the General Plan and analyzed in the General Plan EIR. The Housing Element Update does not require new construction or expansion of existing roadway infrastructure (e.g., new roads); however, infrastructure improvements to provide utilities to the existing and candidate sites would be necessary. Necessary infrastructure improvements would be limited to those necessary to serve projects associated with the Housing Element Update and would not be sized to accommodate additional population growth beyond the growth disclosed herein.

The Housing Element Update would accommodate up to ~~2,722~~ 2,745 net new dwelling units, which would accommodate approximately ~~8,765~~ 8,839 people (based on 3.22 persons per household). Above the existing conditions, the Housing Element Update would result in a potential total of ~~58,357~~ 58,380 dwelling units and a population level of ~~184,552~~ 184,626. The General Plan projects that at buildout (in 30 years or more), the City and its study areas would accommodate 332,254 people within 102,865 dwelling units. In addition, SACOG's 2036 projections for Elk Grove estimate that the City will have a population of 201,197 people accommodating 65,367 dwelling units (City of Elk Grove 2018:3.0-2, SACOG 2012). The population increase and development potential associated with the Housing Element Update and SACOG projections would be included within the relevant estimates and thus generally consistent with City and regional growth assumptions.

The first full paragraph on page 3.10-15 is revised as follows:

Elk Grove's total RHNA for the 2021–2029 planning period is 8,263 units, allocated to specific income groups. The City currently has an adequate number of zoned residential sites to meet RHNA requirements for the moderate and above moderate income groups. It has identified 43 possible housing sites (18 existing sites and 25 new candidate sites) located within City limits that could accommodate housing to meet the RHNA very low and low income levels. The 25 candidate sites, sites C-1 through C-25, would require rezoning, which covers 122.03 acres. Implementation of the Housing Element Update could accommodate up to ~~2,722~~ 2,745 units over the adopted General Plan land use designations. All 43 of the proposed housing sites are designated for urban or residential uses in the adopted General Plan; none of the existing and candidate sites are designated for conservation or preservation uses.

The first full paragraph below the summary of Impact 3.12-2 on page 3.12-8 is revised as follows:

Implementation of the Housing Element Update would increase housing and density in the City. The Housing Element Update would accommodate up to ~~2,722~~ 2,745 additional dwelling units beyond the number anticipated in the original General Plan EIR. The additional units would accommodate approximately ~~8,773~~ 8,839 people (based on 3.223 persons per household). To maintain EGPD's current officer-to-resident population ratio of 0.81 sworn police officers per 1,000 residents, approximately eight new officers and/or administrative staff may be needed to

serve the City. The EGPD 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. The main police service campus is growing to accommodate the need for more police department office and storage space.

The first full paragraph below the summary of Impact 3.12-3 on page 3.12-9 is revised as follows:

As stated previously, implementation of the Housing Element Update would result in additional housing in the City. Overall, the Housing Element Update could increase the number of dwelling units in the City up to ~~2,722~~ 2,745 units beyond those identified in the General Plan. This increase of ~~2,722~~ 2,745 net new housing units would result in a potential population increase in the City of up to ~~8,773~~ 8,839 persons when compared to the adopted General Plan. Implementation of the Safety Element Update would update current policies but would not increase development that would generate new students. Therefore, the Safety Element Update would not result in effects related to the increased demand for public school facilities.

Table 3.12-1 on page 3.12-9 is revised as follows:

Table 3.12-1 Potential New Students

Grade Level	Multi-Family Units	Maximum Potential of Additional Units Beyond General Plan Buildout	New Students
Elementary K-6	0.2108	2,722 <u>2,745</u>	574 <u>579</u>
Middle School 7-8	0.0541		147 <u>149</u>
High School 9-12	0.1270		346 <u>349</u>
Total		2,722 <u>2,745</u>	1,067 <u>1,077</u>

The first paragraph following Table 3.12-1 on page 3.12-9 is revised as follows:

Based on the existing student generation factors, the Housing Element Update could result in an additional ~~1,144~~ 1,077 students to be enrolled at EGUSD schools.

The first paragraph below the summary of Impact 3.12-4 on page 3.12-10 is revised as follows:

Implementation of the Housing Element Update would in additional housing beyond what is currently allowed under the General Plan. This could result in an additional ~~2,722~~ 2,745 dwelling units and a net increase of ~~8,773~~ 8,839 in City population beyond what is currently anticipated at buildout under the General Plan. CCSD parkland standards, City Municipal Code Chapter 22.40 and General Plan Policy PT-1-3 require a minimum of 5 acres of developed parkland per 1,000 residents; the Laguna Ridge Specific Plan calls for parkland at a rate of 7 acres per 1,000 residents. The City has also established requirements for bicycle, pedestrian, and trail facilities as part of new development, either through the City’s Bicycle, Pedestrian, and Trails Master Plan, or through the requirements of an area plan, such as LRSP or SEPA; though, these facilities are in addition to the required park facilities. The City requires that private developers proposing residential projects in the City either dedicate land for park facilities or pay a fee in lieu of providing parkland. These dedications and fees are collected by the City or CCSD as part of the development process and used for the purpose of developing new park facilities to serve the development for which the fees were paid. The dedication of parkland and the payment of fees in lieu of dedication were identified in Impact 5.11.4.1 of the General Plan EIR.

The first full paragraph under the summary for Impact 3.14-1 on page 3.14-16 is revised as follows:

Implementation of the Housing Element and Safety Element Update would not, in and of itself, construct new housing in the City. However, the Housing Element Update would facilitate the development of residential units by providing policies and actions that would promote housing

for all persons. The majority of policies and actions in the Housing Element Update commit the City to continuing to encourage the provisions of affordable housing and housing appropriate for special needs groups and to encourage the maintenance of existing housing. Implementation of the Housing Element Update could increase the number of dwelling units in the City by up to ~~2,722~~ 2,745 units over development anticipated in the adopted General Plan through redesignation of General Plan land uses and associated rezoning.

The first paragraph in page 3.14-17 is revised as follows:

Implementation of the Housing Element Update would increase the number of dwelling units in the City by up to ~~2,722~~ 2,745 units over development anticipated in the adopted General Plan through redesignation of General Plan land uses. Table 5.14-4 of the General Plan EIR shows the water demand factors for each General Plan land use designation and calculates the water demand for each land use based on acreage. Using the water demand factors for each existing and proposed land use, Table 3.14-5 below calculates the difference in water demand that would occur with implementation of the land use changes in the Housing Element Update. As calculated below, the Project could result in an increase in water demand of approximately 45.11 AFY. No increase in water demand is anticipated from implementation of the Safety Element Update because no changes in General Plan designated land uses would occur.

The second paragraph below the summary of Impact 3.14-3 on page 3.14-21 is revised as follows:

The Housing Element Update would result in up to ~~2,722~~ 2,745 additional residential units beyond the number assumed in the General Plan EIR, which could result in approximately ~~8,765~~ 8,839 additional residents (assuming 3.22 residents per dwelling unit). Using the solid waste disposal rate of 1.08 tons per resident per year (equivalent to 5.9 pounds per day), implementation of the Housing Element and Safety Element Update would generate approximately ~~9,466~~ 9,546 tons of waste per year. This represents an increase beyond those discussed in the General Plan EIR. However, this increase would reasonably be expected to remain below the statewide per capita target, because the current per capita disposal rate in 2015 was 2.8 pounds per capita per day, and this increase would not be substantial enough to increase the City-Wide per capita disposal rate above the State's goal of 5.9 pounds per capita per day. Implementation of the Safety Element Update would not result in land uses or activities that would generate solid waste service demands.

The second paragraph on page 6-3 is revised as follows:

As noted in Chapter 2, "Project Description," of this Draft SEIR, the Project would result in up to ~~2,722~~ 2,745 new dwelling units beyond what was evaluated in the General Plan EIR (City of Elk Grove 2018). While the Project would increase housing units, all Project parcels were already anticipated for various levels of development under the General Plan (City of Elk Grove 2019). While housing units would increase, the Project could result in a reduced level of commercial development as compared with that anticipated by the General Plan, the Project would not increase the City's development footprint. Implementation of the Housing Element and Safety Element Update could result in the irreversible and irretrievable commitment of material resources and energy during construction and operation of future development, including:

This page intentionally left blank.

3 REVISIONS TO THE DRAFT SEIR

This chapter presents specific text changes made to the Draft SEIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft SEIR and are identified by the Draft SEIR page number. Text deletions are shown in ~~strike through~~, and text additions are shown in underline.

The information contained within this chapter clarifies and expands on information in the Draft SEIR and does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

Revisions to the Executive Summary

To reflect a change to housing site C-3, Impact 3.10-1 on page ES-19 of the Draft SEIR is revised as follows:

Impact 3.10-1: Induce Substantial Population Growth

The Housing Element Update would accommodate up to ~~2,722~~ 2,745 net new dwelling units, which would accommodate approximately ~~8,765~~ 8,839 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.

Revisions to the Project Description

To reflect the updated text of the Housing Element, the text on page 2-5 of the Draft SEIR is revised as follows:

Action 2: Rezone Housing Sites. The City has a lower-income regional housing need of 4,265 units. To meet the lower-income regional housing need, the City will, concurrently with adoption, identify and rezone at least 143 acres with a realistic capacity assumption of 30 units per acre or 171 acres with a realistic capacity assumption of 25 units to the acre, from sites identified sites in Table 34 and site E-1 in Table 33 to accommodate at least 4,265 units, of Chapter 12.4 (Technical Appendix) to provide for sufficient capacity to meet the City's RHNA.

If the City does not complete the rezone prior to the start of the planning period (May 15, 2021), sites will be rezoned consistent with Government Code Section 65583, subdivision (c)(1) and 65583.2 subdivisions (h) and (i). The rezone will accommodate 100 percent of the shortfall during the planning period and will include the following components.

- Permit owner-occupied and rental multifamily uses by right and will not require a conditional use permit or other discretionary review or approval; for developments in which 20 percent or more of the units are affordable to lower income households.
- Permit the development of at least 16 units per site and a minimum of 20 dwelling units per acre for suburban and metropolitan jurisdictions;
- Ensure a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses;
- Ensure sites will be available for development during the planning period where water and sewer can be provided.

The City has, since 2003, required Design Review for all multifamily development. Design Review would be required for multifamily projects on these sites. Projects under 151 units are reviewed at the "staff-level" through consideration by the Zoning Administrator, while larger projects are reviewed by the Planning Commission.

To reflect the updated text of the Housing Element, the text on page 2-6 of the Draft SEIR is revised as follows:

Action 6: Zoning for Missing Middle Housing Types (New, Missing Middle Study). The City shall review and amend the Zoning Code and applicable design guidelines to encourage and promote a mix of dwelling types and sizes, specifically missing middle-density housing types (e.g. duplexes, triplexes, fourplexes, courtyard buildings) to create housing for middle- and moderate-income households and increase the availability of affordable housing in a range of sizes to reduce displacement risk for residents living in overcrowded units or overpaying for housing.

To reflect the updated text of the Housing Element, the text on page 2-6 of the Draft SEIR is revised as follows:

Action 10: Parking Study (New, Staff Recommendation). Conduct a parking study to determine parking needs for senior housing and affordable housing projects. Based on results, continue to allow flexibility in development standards, such as parking reductions for senior projects, and by allowing development incorporating universal design measures.

The City will also review parking requirements for emergency shelters to ensure that parking standards are sufficient to accommodate all staff, provided standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.

To reflect the updated text of the Housing Element, the text on page 2-6 of the Draft SEIR is revised as follows:

Action 11: Homeless Needs Assessment. Continue to contribute funding to Elk Grove Homeless Assistance Resource Team (HART), Sacramento Self Help Housing, and other local and regional entities and work closely with these groups to assess the needs of people experiencing homelessness and develop plans to address homelessness at a regional level. The City will annually meet with local service providers and regional agencies (as applicable) to assess the needs regarding homelessness in the City and region.

The City will also review and amend standards to ensure they are objective and in compliance with Government Code Section 65583(a)(4).

To reflect the updated text of the Housing Element, the text on page 2-7 of the Draft SEIR is revised as follows:

Action 14: Transitional and Supportive Housing (New, State Law). Amend the Zoning Code to comply with Government Code Section 65583(c)(3), which deals with transitional and supportive housing. The City will amend the Zoning Ordinance to allow transitional and supportive housing in the mobile home subdivision (RM-1) and Mobile Home Park Combining District (MHP) zones as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The City will also amend the Zoning Ordinance to allow supportive housing in the Light Industrial (LI) zone, as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Amend the zoning code to allow for the approval of 100-percent affordable developments that include a percentage of supportive housing units, either 25 percent or 12 units, whichever is greater, to be allowed without a conditional use permit or other discretionary review in all zoning districts where multifamily and mixed-use development is permitted.

Action 15: Affordable Housing Database. Continue to update the affordable housing unit database and to provide information regarding affordable housing opportunities, both through direct response to inquiries and making information available on the City's website. The City will make multi-lingual information available as requested.

Action 17: Rehabilitation Programs. Continue to operate housing repair and/or rehabilitation programs that assist lower-income households occupying housing in need of repair, including the Minor Home Repair Program, which offers forgivable loans to low-income homeowners whose homes have one or more health and safety hazards. Identify areas of concentrated rehabilitation need to assist in repairs and potential mitigation of costs, displacement, and relocation impacts on residents. Provide information on available housing repair programs to homeowners by posting information on the City's website and in the City newsletter.

Action 19: Affirmatively Further Fair Housing (New, State Law). Implement the regional Analysis of Impediments to Fair Housing Choice (AI), prepared in 2019, to address disparities in housing needs and in access to opportunity for all persons regardless of race, color, religion, sex, national origin, familial status, disability gender, gender identify, gender expression, sexual orientation, marital status, ancestry, veteran or military status, source of income, and genetic information as protected categories by the California Fair Employment and Housing Act (Part 2.8 [commencing with Section 12900] of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.

The City identified barriers to fair housing through the Fair Housing Assessment (see Chapter 12.4, Section 4, Housing Needs Assessment). Actions the City may take to address the identified barriers, and foster an inclusive community, include:

- ▶ ~~Develop~~ By December 2021 develop a targeted program to connect lower-income residents with affordable homeownership and rental opportunities.
- ▶ Promote the availability of multi-lingual resources by ensuring that City provided services and materials are available in languages other than English or that they make clear the availability of interpretation or translation services. Translate materials and make materials available by December 2021.
- ▶ Work with fair housing providers such as Renters Helpline on an annual basis to track fair housing complaints and identify areas of fair housing law in need of increased enforcement.
- ▶ Meet biannually, with the first meeting occurring by June 2022, with local and regional transit agencies to assess ~~Assess~~ whether the current e-~~Tran~~ routes and frequency meet demand and determine additional needs, if necessary.
- ▶ Where possible, improve bus stops to allow the safe deployment of wheelchair lifts and, where not possible, determine if a new stop can be added near the original that does allow life deployment. Assess where bus stops need improvement by August 2022.
- ▶ Encourage development of multifamily housing in areas with high performing schools to improve access to these schools for lower-income households by annually providing developers with information on incentives for affordable multifamily development and maintaining a list of available sites near high performing schools.
- ▶ Providing information about fair housing choices to residents by distributing fair housing materials upon request and contracting with a fair housing rights nonprofit to provide fair housing services on an ongoing basis, including fair housing complaint intake, investigation, resolution, general housing (landlord/tenant) counseling, mediations, assistance, referrals, and resolution.
- ▶ Proactively monitoring rental housing providers for discriminatory practices by contacting fair housing service providers biannually for information on housing providers with complaints filed against them and using CDBG funds for fair housing enforcement and technical assistance activities.
- ▶ ~~Providing training to landlords and property owners on avoiding discriminatory practices based on income or other protected classes, processing reasonable accommodation re-quests, and educating them on the Housing Choice Voucher Program, including new le-gal requirements pursuant to SB 329.~~
- ▶ Meeting Meet with other jurisdictions in the region by June 2023 to identify fair housing strategies and discuss whether a regional fair housing strategy would be beneficial from a cost and/or efficiency perspective.
- ▶ ~~Using~~ Use local permitting and approval processes to ensure all new multifamily construction meets the accessibility requirements of the federal and state fair housing acts.
- ▶ ~~Increasing~~ Increase residential infill opportunities through changes in zoning and long-range plans. Process zone changes as requested by developers. Implement zoning and development incentives, such as inclusionary zoning, in-lieu fees, and density bonuses.

- ▶ ~~Supporting~~ Support development or resale of affordable homeownership opportunities through both developers' operations and obtaining resources to support low-income homebuyers, including affirmatively marketing to under-represented homeowners and developing and funding a first-time homebuyers' program.
- ▶ ~~Providing~~ Provide financial support annually, as available to organizations that provide counseling, information, education, support, and/or legal advice to lower-income households, including extremely low-income households, and persons experiencing homelessness.
- ▶ Affirmatively recruiting a diverse and multilingual staff as positions become available.
- ▶ ~~Analyzing~~ Analyze and ~~abating~~ abate environmental hazards before developing affordable housing.
- ▶ ~~Using~~ As the City grows, use data to identify areas of high need and areas of high opportunity; rezoning higher-density sites in identified areas of high opportunity.
- ▶ ~~Collaborating with the City's transit department and other transit providers in the region to develop transit lines and route schedules based on community needs.~~
- ▶ ~~Providing~~ Provide education to the community on the importance of completing Census questionnaires when the Census is distributed.
- ▶ To affirmatively promote more inclusive communities, the City will review the City's requirements for residential care facilities with 7 or more persons and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. These types of facilities are still subject to state licensing requirements.

To reflect the updated text of the Housing Element, the text on page 2-9 of the Draft SEIR is revised as follows:

Action 23: Housing Choice Voucher Education. Implement a Housing Choice Voucher (Section 8) education program to share information about the program and available incentives with rental property owners and managers as well as training on avoiding discriminatory practices based on income or other protected classes. When the waitlist for tenant-based vouchers is open, publicize the opportunity through the City's social media and/or other public information channels.

To reflect corrections to sites E-13 and E-18 and a change in proposed zoning for housing site C-3, Table 2-2 beginning on page 2-14 of the Draft SEIR is revised as follows:

Table 2-2 Existing Sites and Candidate Sites for Very Low and Low Income Groups

Map ID	General Location	Acreage	Existing General Plan Designation	Existing Zoning	Proposed General Plan Designation	Proposed Rezoning	Dwelling Units
E-1	M&H Site in Lent Ranch	12.8	HDR	RD-20	HDR	RD-20	230
E-2	Quail Run	4.88	HDR	RD-25	HDR	RD-25	102
E-3	Southeast corner of Bruceville Road and Poppy Ridge Road	15.48	HDR	RD-20	HDR	RD-30	418
E-4	Northwest corner of Bruceville Road and Big Horn Boulevard	6.5	HDR	RD-25	HDR	RD-30	178
E-5	SEPA, Clark Property, Poppy Ridge at Lotz Parkway	9	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (25-30)	243
E-6	SEPA, Suyanaga Property, Southeast corner of Poppy Ridge and Big Horn	8.6	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (25-30)	233
E-7	SEPA, Souza Lot 1096	7.1	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	192
E-8	SEPA, Souza Lot 1097	7.9	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	198
E-9	SEPA, Souza Lot 1098	6.5	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	163
E-10	SEPA, Souza Lot 1098	7.2	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	180
E-11	SEPA, Souza Lot 1105	9.3	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (15.1-30)	233
E-12	SEPA, Bruceville Meadows	8.4	HDR	SEPA-HDR (15.1-30)	HDR	SEPA-HDR (25-30)	227
E-13	Laguna Ridge, Backer Property, Southwest corner of Big Horn and Poppy Ridge	11.1	HDR	RD-25	HDR	RD-25 RD-30	300
E-14	Elk Grove Florin Road at Brown Road	4.4	HDR	RD-25	HDR	RD-30	119
E-15	Harbour Point Drive and Maritime Drive	3.06	HDR	RD-25	HDR	RD-30	83
E-16	East Stockton Boulevard at Bow Street	2.9	HDR	RD-25	HDR	RD-30	78
E-17	Sheldon Farms North, Stein	5.3	HDR	RD-25	HDR	RD-30	143
E-18	Sheldon Farms South, Arsone	9	HDR	RD-25	HDR	RD-25 RD-30	243
C-1	Sterling Meadows HDR Site (southeast corner of Lotz Parkway and Bilby Road)	10.68	HDR	RD-20	HDR	RD-30	289
C-2	End of Dunisch Road	2.87	RC	SC	HDR	RD-25	72
C-3	Laguna Boulevard and Bruceville Road (COBRA/Pacific Properties)	7.6	MDR	RD-15	HDR	RD-30 RD-40	205 228
C-4	2804 Elk Grove Boulevard (Samos)	7.49	MDR	RD-15	HDR	RD-30	202

Map ID	General Location	Acreage	Existing General Plan Designation	Existing Zoning	Proposed General Plan Designation	Proposed Rezoning	Dwelling Units
C-5	Southeast corner Sheldon Road and East Stockton Boulevard	12.3	RC	SC	HDR	RD-30	332
C-6	Northeast corner Sheldon Road and Power Inn Road	8	CC	GC	HDR	RD-30	216
C-7	Waterman Road at Rancho Drive	3.5	LDR	RD-4	HDR	RD-25	88
C-8	8994 Calvine Road	2.32	RC	RD-5	HDR	RD-25	58
C-9	8770 Calvine Road	3.5	HDR	RD-20	HDR	RD-25	88
C-10	Laguna Boulevard and Haussmann Street	6.96	CC	LC	HDR	RD-30	198
C-11	Laguna Vaux	2.59	CC	LC	HDR	RD-30	70
C-12	Laguna Boulevard and Gropius Street	5.85	EC	MP	HDR	RD-30	158
C-13	9296 E Stockton Boulevard	3.81	HDR	RD-20	HDR	RD-30	103
C-14	9343 E Stockton Boulevard	1.96	EC	BP	HDR	RD-30	53
C-15	Northwest corner Bond Road and Waterman Road	4.6	CC	GC	HDR	RD-25	115
C-16	Stathos Property (Elk Grove Blvd, west of Carlton assisted care facility)	3.19	LDR	RD-5	HDR	RD-30	86
C-17	Waterman 75 (Mosher Road and Grant Line Road)	5	RC	RD-10	HDR	RD-30	135
C-18	Bow Street Northwest	10.3	LDR	RD-6	HDR	RD-30	258
C-19	Old Town, southwest corner of Elk Grove Boulevard and Webb Street	1.87	CC	OTSPA	HDR	RD-25	53
C-20	Southeast corner Bond Road and Waterman Road	1.5	RR	AR-2	HDR	RD-25	38
C-21	Bond Road and Stonebrook Drive	1.66	MDR	RD-15	HDR	RD-25	42
C-22	Calvine Road and Jordan Ranch Road	2.06	ER	RD-4	HDR	RD-25	52
C-23	Calvine Road and Bradshaw Road	2.02	CC	GC/AR-5	HDR	RD-25	21
C-24	Southwest corner Lotz Parkway and Whitelock Parkway	5	LDR	RD-5	HDR	RD-25	125
C-25	Bradshaw, just south of Calvine, behind/adjoining Eden Gardens Event Center	5.17	ER	AR-5	HDR	RD-25	129
Total		261.5 acres					6,749 6,772

To reflect a change in proposed zoning for housing site C-3, the paragraph beginning at the bottom of page 2-14 of the Draft SEIR is revised as follows:

As shown in Table 2-2, the proposed Housing Element Update would accommodate up to ~~6,749~~ 6,772 units for the RHNA very low and low income groups, which exceeds the City’s requirement of providing 4,265 units for these income groups.

The first paragraph on page 2-15 of the Draft SEIR is revised as follows:

Table 2-3 below identifies the potential number of units under the adopted General Plan and the maximum number of units under the proposed Housing Element Update. As shown in Table 2-3, the adopted General Plan and current zoning anticipates 4,027 units on the existing and candidate housing sites. Under the proposed Housing Element Update, up to an additional ~~2,722~~ 2,745 units would be provided based upon the assumed average density. The proposed rezoning of candidate housing sites C-2, C-5, C-6, C-10, C-11, C-12, C-14, C-15, C-17, C-19, and C-23 would result in the loss of planned nonresidential uses and approximately 1,419 jobs under buildout of the General Plan.

Table 2-3 beginning on page 2-15 of the Draft SEIR is revised as follows:

Table 2-3 Existing and Proposed Development Potential under the General Plan

Map ID	Potential Dwelling Units Adopted General Plan Land Use Designations	Potential Dwelling Units Housing Element Update	Development Potential Change From Adopted General Plan
E-1	230	230	0
E-2	102	102	0
E-3	310	418	108
E-4	163	178	15
E-5	225	243	18
E-6	215	233	18
E-7	178	192	14
E-8	198	198	0
E-9	163	163	0
E-10	180	180	0
E-11	233	233	0
E-12	210	227	17
E-13	300	300	0
E-14	110	119	9
E-15	77	83	6
E-16	73	78	5
E-17	133	143	10
E-18	225	243	18
C-1	192	289	97
C-2	0	72	72
C-3	91	205 <u>228</u>	114 <u>137</u>
C-4	90	202	112
C-5	0	332	332
C-6	0	216	216
C-7	14	88	74

Map ID	Potential Dwelling Units Adopted General Plan Land Use Designations	Potential Dwelling Units Housing Element Update	Development Potential Change From Adopted General Plan
C-8	12	58	46
C-9	63	88	25
C-10	0	198	198
C-11	0	70	70
C-12	0	158	158
C-13	67	103	36
C-14	0	53	53
C-15	0	115	115
C-16	16	86	70
C-17	40	135	95
C-18	62	258	196
C-19	0	53	53
C-20	1	38	37
C-21	20	42	22
C-22	8	52	44
C-23	0	21	21
C-24	25	125	100
C-25	1	129	128
Total	4,027	6,749 6,772	2,722 2,745

Revisions to Section 3.5, Energy

To reflect a change in proposed zoning for housing site C-3, first paragraph on page 3.5-9 of the Draft SEIR is revised as follows:

For instance, parcels C-1, Sterling Meadows High-Density Residential Site, C-3, Laguna Boulevard and Bruceville Road, and C-4, 2804 Elk Grove Boulevard (among several others) are proposed to be rezoned to RD-30 or RD-40 to provided additional higher-density, affordable housing to meet the City's housing needs (see Table 2-2 in Chapter 2, "Project Description."

Revisions to Section 3.8, Hazards and Hazardous Materials

To reflect a change in proposed zoning for housing site C-3, the paragraph under Impact 3.8-2 on page 3.8-12 of the Draft SEIR is revised as follows:

General Plan EIR Impact 5.8.3 evaluated the potential for hazardous emissions within one-quarter mile of existing or proposed schools. The analysis noted that there are several elementary schools, middle schools, and high schools as well as several private schools, preschools, and childcare facilities within the City. The analysis concluded that while the General Plan could result in activities that would involve the use of hazardous materials within one-quarter mile of a school, adherence to existing regulations and General Plan policies would ensure that impacts would be less than significant. Eighteen potential housing sites (Sites C-3, C-4, C-5, C-6, C-8, C-9, C-10, C-13, C-14, C-16, C-21, C-22, C-23, C-25, E-2, E-4, E-15, and E-18) are located within one-quarter mile of an existing or proposed school. Implementation of the Project could result in a net increase in the number of residential units in the City over what is planned for under the General Plan by up to ~~2,722~~ 2,745 net new residential units depending on the final selection of housing sites for the Housing Element Update. Residential land uses do not typically involve the storage or usage of substantial quantities of hazardous materials, and thus, Project implementation would not result in a substantial increase of hazardous materials located near schools.

Revisions to Section 3.10, Land Use, Planning, Population, and Housing

To reflect a change in proposed zoning for housing site C-3, Impact 3.10-1 on page 3.10-14 of the Draft SEIR is revised as follows:

Impact 3.10-1: Induce Substantial Population Growth

The Housing Element Update would accommodate up to ~~2,722~~ 2,745 net new dwelling units, which would accommodate approximately ~~8,765~~ 8,839 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**.

Table 2-2 and Figure 2-2 in Chapter 2, "Project Description," indicate the location and size of existing and candidate sites. While no specific development projects are proposed at this time, subsequent multi-family development on any or all of the existing and candidate sites would be not considered additional population or housing growth above that projected in the General Plan and analyzed in the General Plan EIR. The Housing Element Update does not require new construction or expansion of existing roadway infrastructure (e.g., new roads); however, infrastructure improvements to provide utilities to the existing and candidate sites would be necessary. Necessary infrastructure improvements would be limited to those necessary to serve projects associated with the Housing Element Update and would not be sized to accommodate additional population growth beyond the growth disclosed herein.

The Housing Element Update would accommodate up to ~~2,722~~ 2,745 net new dwelling units, which would accommodate approximately ~~8,765~~ 8,839 people (based on 3.22 persons per household). Above the existing conditions, the Housing Element Update would result in a potential total of ~~58,357~~ 58,380 dwelling units and a population level of ~~184,552~~ 184,626. The General Plan projects that at buildout (in 30 years or more), the City and its study areas would accommodate 332,254 people within 102,865 dwelling units. In addition, SACOG's 2036 projections for Elk Grove estimate that the City will have a population of 201,197 people accommodating 65,367 dwelling units (City of Elk Grove 2018:3.0-2, SACOG 2012). The population increase and development potential associated with the Housing Element Update and SACOG projections would be included within the relevant estimates and thus generally consistent with City and regional growth assumptions.

To reflect a change in proposed zoning for housing site C-3, the first full paragraph on page 3.10-15 of the Draft SEIR is revised as follows:

Elk Grove's total RHNA for the 2021–2029 planning period is 8,263 units, allocated to specific income groups. The City currently has an adequate number of zoned residential sites to meet RHNA requirements for the moderate and above moderate income groups. It has identified 43 possible housing sites (18 existing sites and 25 new candidate sites) located within City limits that could accommodate housing to meet the RHNA very low and low income levels. The 25 candidate sites, sites C-1 through C-25, would require rezoning, which covers 122.03 acres. Implementation of the Housing Element Update could accommodate up to ~~2,722~~ 2,745 units over the adopted General Plan land use designations. All 43 of the proposed housing sites are designated for urban or residential uses in the adopted General Plan; none of the existing and candidate sites are designated for conservation or preservation uses.

Revisions to Section 3.12, Public Services and Recreation

To reflect a change in proposed zoning for housing site C-3, first full paragraph below the summary of Impact 3.12-2 on page 3.12-8 of the Draft SEIR is revised as follows:

Implementation of the Housing Element Update would increase housing and density in the City. The Housing Element Update would accommodate up to ~~2,722~~ 2,745 additional dwelling units beyond the number anticipated in the original General Plan EIR. The additional units would accommodate approximately ~~8,773~~ 8,839 people (based on ~~3.223~~ persons per household). To maintain EGPD's current officer-to-resident population ratio of 0.81 sworn police officers per 1,000 residents, approximately eight new officers and/or

administrative staff may be needed to serve the City. The EGPD 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. The main police service campus is growing to accommodate the need for more police department office and storage space.

To reflect a change in proposed zoning for housing site C-3, the first full paragraph below the summary of Impact 3.12-3 on page 3.12-9 of the Draft SEIR is revised as follows:

As stated previously, implementation of the Housing Element Update would result in additional housing in the City. Overall, the Housing Element Update could increase the number of dwelling units in the City up to ~~2,722~~ 2,745 units beyond those identified in the General Plan. This increase of ~~2,722~~ 2,745 net new housing units would result in a potential population increase in the City of up to ~~8,773~~ 8,839 persons when compared to the adopted General Plan. Implementation of the Safety Element Update would update current policies but would not increase development that would generate new students. Therefore, the Safety Element Update would not result in effects related to the increased demand for public school facilities.

To reflect a change in proposed zoning for housing site C-3, Table 3.12-1 on page 3.12-9 of the Draft SEIR is revised as follows:

Table 3.12-1 Potential New Students

Grade Level	Multi-Family Units	Maximum Potential of Additional Units Beyond General Plan Buildout	New Students
Elementary K-6	0.2108	2,722 <u>2,745</u>	574 <u>579</u>
Middle School 7-8	0.0541		147 <u>149</u>
High School 9-12	0.1270		346 <u>349</u>
Total		2,722 <u>2,745</u>	1,067 <u>1,077</u>

The first paragraph following Table 3.12-1 on page 3.12-9 of the Draft SEIR is revised as follows:

Based on the existing student generation factors, the Housing Element Update could result in an additional ~~1,144~~ 1,077 students to be enrolled at EGUSD schools.

The first paragraph below the summary of Impact 3.12-4 on page 3.12-10 of the Draft SEIR is revised as follows:

Implementation of the Housing Element Update would in additional housing beyond what is currently allowed under the General Plan. This could result in an additional ~~2,722~~ 2,745 dwelling units and a net increase of ~~8,773~~ 8,839 in City population beyond what is currently anticipated at buildout under the General Plan. CCSD parkland standards, City Municipal Code Chapter 22.40 and General Plan Policy PT-1-3 require a minimum of 5 acres of developed parkland per 1,000 residents; the Laguna Ridge Specific Plan calls for parkland at a rate of 7 acres per 1,000 residents. The City has also established requirements for bicycle, pedestrian, and trail facilities as part of new development, either through the City’s Bicycle, Pedestrian, and Trails Master Plan, or through the requirements of an area plan, such as LRSP or SEPA; though, these facilities are in addition to the required park facilities. The City requires that private developers proposing residential projects in the City either dedicate land for park facilities or pay a fee in lieu of providing parkland. These dedications and fees are collected by the City or CCSD as part of the development process and used for the purpose of developing new park facilities to serve the development for which the fees were paid. The dedication of parkland and the payment of fees in lieu of dedication were identified in Impact 5.11.4.1 of the General Plan EIR.

Revisions to Section 3.14, Utilities and Service Systems

To reflect a change in proposed zoning for housing site C-3, the first full paragraph under the summary for Impact 3.14-1 on page 3.14-16 of the Draft SEIR is revised as follows:

Implementation of the Housing Element and Safety Element Update would not, in and of itself, construct new housing in the City. However, the Housing Element Update would facilitate the development of residential units by providing policies and actions that would promote housing for all persons. The majority of policies and actions in the Housing Element Update commit the City to continuing to encourage the provisions of affordable housing and housing appropriate for special needs groups and to encourage the maintenance of existing housing. Implementation of the Housing Element Update could increase the number of dwelling units in the City by up to ~~2,722~~ 2,745 units over development anticipated in the adopted General Plan through redesignation of General Plan land uses and associated rezoning.

The first paragraph in page 3.14-17 of the Draft SEIR is revised as follows:

Implementation of the Housing Element Update would increase the number of dwelling units in the City by up to ~~2,722~~ 2,745 units over development anticipated in the adopted General Plan through redesignation of General Plan land uses. Table 5.14-4 of the General Plan EIR shows the water demand factors for each General Plan land use designation and calculates the water demand for each land use based on acreage. Using the water demand factors for each existing and proposed land use, Table 3.14-5 below calculates the difference in water demand that would occur with implementation of the land use changes in the Housing Element Update. As calculated below, the Project could result in an increase in water demand of approximately 45.11 AFY. No increase in water demand is anticipated from implementation of the Safety Element Update because no changes in General Plan designated land uses would occur.

The second paragraph below the summary of Impact 3.14-3 on page 3.14-21 of the Draft SEIR is revised as follows:

The Housing Element Update would result in up to ~~2,722~~ 2,745 additional residential units beyond the number assumed in the General Plan EIR, which could result in approximately ~~8,765~~ 8,839 additional residents (assuming 3.22 residents per dwelling unit). Using the solid waste disposal rate of 1.08 tons per resident per year (equivalent to 5.9 pounds per day), implementation of the Housing Element and Safety Element Update would generate approximately ~~9,466~~ 9,546 tons of waste per year. This represents an increase beyond those discussed in the General Plan EIR. However, this increase would reasonably be expected to remain below the statewide per capita target, because the current per capita disposal rate in 2015 was 2.8 pounds per capita per day, and this increase would not be substantial enough to increase the City-Wide per capita disposal rate above the State's goal of 5.9 pounds per capita per day. Implementation of the Safety Element Update would not result in land uses or activities that would generate solid waste service demands.

Revisions to Chapter 6, Other CEQA-Mandated Sections

To reflect a change in proposed zoning for housing site C-3, the second paragraph on page 6-3 of the Draft SEIR is revised as follows:

As noted in Chapter 2, "Project Description," of this Draft SEIR, the Project would result in up to ~~2,722~~ 2,745 new dwelling units beyond what was evaluated in the General Plan EIR (City of Elk Grove 2018). While the Project would increase housing units, all Project parcels were already anticipated for various levels of development under the General Plan (City of Elk Grove 2019). While housing units would increase, the Project could result in a reduced level of commercial development as compared with that anticipated by the General Plan, the Project would not increase the City's development footprint. Implementation of the Housing Element and Safety Element Update could result in the irreversible and irretrievable commitment of material resources and energy during construction and operation of future development, including:

4 REFERENCES

City of Elk Grove. 2018 (July). *City of Elk Grove General Plan Update Draft Environmental Impact Report*. SCH No. 2017062058

———. 2019 (December). *City of Elk Grove General Plan*. Elk Grove, CA.

This page intentionally left blank.

5 LIST OF PREPARERS

LEAD AGENCY

City of Elk Grove

Christopher Jordan, AICP Director of Strategic Planning and Innovation

PREPARERS OF THE ENVIRONMENTAL DOCUMENT

Ascent Environmental Inc.

Patrick Angell, AICP Principal

Cori Resha, J.D. Project Manager

Gayiety Lane Publications

Michele Mattei Publications

This page intentionally left blank.